

**Title: Substance Abuse Prevention**

**Policy No: 2010**

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**Purpose:** Greenview has an interest in establishing programs to promote and enhance health and safety in the workplace. Greenview Substance Abuse Prevention Policy is directed at protecting the health and safety of employees, co-workers, general public and the environment. The Substance Abuse Prevention Policy combines drug and alcohol testing with education, training and access to assistance.

**DEFINITIONS**

**Accredited Laboratory** means a laboratory that meets guidelines and standards of the Substance Abuse and Mental Health Services Administration, which is the certifying agency for forensic urine drug testing laboratories in Canada and the United States. Collection and testing processes follow the U.S. Department of Health and Human Services guidelines.

**Alcohol** means the intoxicating agent in beverage alcohol, ethyl alcohol or other low molecular weight alcohols including methyl or isopropyl alcohol.

**Breath Alcohol Concentration (BAC)** means the alcohol in a volume of breath expressed in terms of grams of alcohol per 210 litres of breath.

**Breath Alcohol Technician** means an individual trained and certified to conduct breath alcohol testing utilizing an Evidential Breath Tester.

**Chain of Custody** means the process of documenting the handling of a specimen from the time a donor gives the specimen to the collector, during the testing at the laboratory, and until the results are reported by the laboratory.

**Collector** means non-medical and medical personnel contracted by an agency who have received training in collecting urine samples in accordance with guidelines that would be acceptable to the regulatory agencies.

**Designated Employer** means an employer which is an affiliate of the organization and which is designated as such for the purposes of this Policy by the organization.

**Drug** means any substance other than food, which is taken to change the way the body or mind functions. Drug testing refers to marijuana, cocaine, opiates, phencyclidine and amphetamines with cut-off levels as per the Substance Abuse and Mental Health Services Administration of the Department of Health and Human Services, which is the certifying agency for forensic urine drug testing laboratories in Canada and the United States.

**Evidential Breath Testing Device** means capable of measuring the alcohol content of deep lung breath samples with sufficient accuracy for evidential purposes. The Evidential Breath Tester must be on the conforming products list as per the U.S. National Highway Traffic Safety Administration.

**Fit for Duty** means being capable of performing work related duties in a safe, efficient, productive manner with no drugs and or alcohol present in the body at or above established standards.

**Greenview** means the municipal corporation of the Municipal District of Greenview No. 16.

**Medical Review Officer (MRO)** means a licensed physician responsible for receiving laboratory results generated by an employer's drug testing program who has knowledge of substance abuse disorders and has appropriate medical training to interpret and evaluate an individual's confirmed positive test result together with his or her medical history and any other relevant bio medical information.

**MDMA** means Methylenedioxyamphetamine.

**MDA** means Methylenedioxyamphetamine.

**Significant Incident** means incidents involving a fatality, disabling injury, significant property damage, spill or abnormal discharge that may cause long term health effects to employees and or the public, public evacuation or serious environmental damage or an event or near miss that could have had potential serious consequences.

**Substance** medical marijuana is not recognized by Health Canada as a therapeutic drug therefore may be referred to as a substance.

**Substance Abuse Professional (SAP)** means a licensed Physician or a licensed or certified psychologist, social worker, employee assistance professional or an addictions counselor. All must have knowledge of and clinical experience in the diagnosis and treatment of alcohol, drugs and related disorders. Also referred to as a Substance Abuse Expert (SAE).

**Supervisor Training** shall include the physical, behavioral, speech and performance indicators of probable alcohol or drug misuse and appropriate intervention strategies.

**POLICY****1. Scope**

- 1.1 This policy applies to all employees and management of Greenview. While this policy refers specifically to alcohol and drugs, it is intended to apply to all other forms of substance abuse.
- 1.2 The guiding principles of the Canadian Model for Providing a Safe Workplace, a best practice guide from the Construction Owners Association of Alberta (COAA) and Energy Safety Canada are incorporated into this policy.
- 1.3 Greenview shall comply with all applicable Federal and Provincial related laws and or regulations.

**2. Roles and Responsibilities****2.1 Employees are expected to:**

- a. Arrive fit for duty and remain fit for duty during their period of work.
- b. Take responsibility for their own safety and others at the workplace.
- c. Consult with their licensed medical practitioner or pharmacist regarding the proper use of medication they are using to determine if the medication may have a negative effect on their performance.
- d. Advise their direct supervisor, management, or Human Resources if they are using a prescribed drug that their licensed medical practitioner or pharmacist has advised would interfere with their ability to work.
- e. Disclose and seek advice on appropriate counseling or treatment if they suspect they have a dependency or an emerging substance abuse issue.
- f. Take appropriate actions to ensure a co-worker does not remain in an unfit condition at work that may endanger the employee, co-workers or others. This may include contacting your supervisor or management.
- g. Employees receiving standby pay for on-call situations are expected to be fit for duty and in compliance with these standards. If unexpected circumstances arise where an employee is requested to perform unscheduled services while under the influence of alcohol or medications, it is the responsibility of the employee to decline the call.

**2.2 Supervisors will:**

- a. Monitor and evaluate work performance with an objective of early identification and handling of all performance issues.
- b. Ensure that investigations of work related incidents are carried out in accordance with Greenview incident investigation procedures.
- c. Refer an employee for a drug and or alcohol test when required to do so under this policy.
- d. Monitor policy compliance and take appropriate action as required under this policy.
- e. Arrange for safe transportation of an employee to their residence or nearest public transportation when appropriate under this policy.

### **2.3 Management will:**

- a. Act as a confidential and objective resource within Greenview on matters related to the Substance Abuse Prevention Policy.
- b. Monitor and evaluate work performance with an objective of early identification and handling of all performance issues.
- c. Ensure that investigations of work related incidents are carried out in accordance with Greenview incident investigation procedures.
- d. Refer an employee for a drug and or alcohol test when required to do so under this policy.
- e. Monitor policy compliance and take appropriate action as required under this policy.
- f. Arrange for safe transportation of an employee to their residence or nearest public transportation when appropriate under this policy.
- g. Undertake periodic reviews and revisions of the Substance Abuse Prevention Policy.

### **2.4 Human Resources/ Safety Personnel**

- a. Act as a confidential and objective resource within Greenview on matters related to the Substance Abuse Prevention Policy.
- b. Communicate with the licensed medical practitioner, Medical Review Officer (MRO) and Substance Abuse Professional (SAP) as required.
- c. Provide confidential service to all employees regarding drug and alcohol information, referral to an SAP but not to provide any counselling.
- d. Maintain confidential records of all test results, including refusals to test, correspondence from the Medical Practitioner, MRO and or SAP.
- e. Maintain records of all training /education of management, supervisors and employees.

## **3. Prohibitions**

### **3.1 Alcohol Use**

- a. Alcohol concentration: No employee shall report for duty or remain on duty while having a confirmed breath alcohol concentration of 0.02 or greater.
- b. On duty use: No employee shall use alcohol while on duty.
- c. Pre-duty use: No employee shall perform work functions within four hours after using alcohol.
- d. Use following an incident: No employee required to take a post-incident alcohol test shall use alcohol for eight hours following the incident, or until he/she undergoes a post-incident alcohol test, whichever occurs first.

### **3.2 Drug Use**

- a. No employee shall report for duty or remain on duty when the employee uses any drug, except when the use is pursuant to the instructions of a licensed medical practitioner who has advised the employee that the drug will not adversely affect the employee's ability to work safely at the job site. If a licensed medical practitioner advises the employee that the drug will affect the employee's ability to work safely, the employee will immediately notify management of the circumstances.
- b. No employee in a safety sensitive position shall report for duty or remain on duty when the employee uses medical cannabis, except when the use is pursuant to the instructions of a licensed medical practitioner who has provided Greenview with an acceptable Clearance Letter that the prescribed medical cannabis will not adversely affect the employee's ability to work safely.
- c. Management shall ensure that the employee is removed from duty and accommodated to meet safety concerns. Accommodation where feasible may include work restrictions, modified duties, sick or disability leave.
- d. No employee will intentionally misuse prescription or over the counter medications in such a manner as to render themselves unfit to safely perform their duties.

### **3.3 Possession**

- a. Possession, use or offering for sale of alcohol, cannabis, drugs or drug paraphernalia on Greenview or client sites or Greenview vehicles is prohibited.
- b. Possession of devices or products designed to compromise drug and or alcohol testing are prohibited.
- c. Employees who violate this provision may be subject to immediate termination and referral to law enforcement agencies when applicable.
- d. Use of alcohol for social functions or when it relates to Greenview business is permitted when approved by management who will ensure that the use does not contravene the intent of this policy and any applicable laws or regulations.
- e. Medical cannabis can only be possessed and used on Greenview property with prior written approval from management.

## **4. Testing Options**

### **4.1 Post-Incident**

- a. An employee will be drug and alcohol tested after an incident that involves a fatality, disabling injury or significant near miss that could have had potential serious consequences.
- b. Management and/or Supervisors are required to conduct immediate preliminary investigation.

- c. Testing will never delay necessary medical attention for injured worker following an incident.
- d. Testing is not required when the act or omission of the employee was not a contributing factor.
- e. Testing is required when the actions or inactions of a worker were the contributing factor leading to the incident and it is not frivolous.
- f. Wherever possible drug testing should occur within 2 hours of incident with attempts to test for up to 32 hours of incident. Alcohol testing should occur within 2 hours of incident with attempts to test for up to 8 hours of incident.
- g. Reasons are documented if testing is required, not required or unable to conduct required tests.

#### **4.2 Reasonable Cause Testing**

- a. An employee will be tested for alcohol and or drug use where Greenview management or other official, who is trained to identify drug and alcohol use by an employee, makes observations which form a reasonable basis for suspecting that the employee is in breach of this policy. Such observations must be documented, specific, clearly stated observations concerning the appearance, speech or body odors of the employee. The observations may include indications of the chronic and withdrawal effects of drug and alcohol use.
- b. Observations which may lead to reasonable cause testing are not limited to, but include: odor of alcoholic beverage or marihuana on breath, slurred speech, glassy eyes, unsteadiness in walking, standing, flushed face, disoriented and or drowsy, incidents or injuries, repeated errors in job performance, excessive absenteeism or lateness, credible complaints of drug and or alcohol use at work.

#### **4.3 Return to duty**

- a. Drug and or alcohol testing of an employee who has engaged in prohibited conduct and is returning to work after an assessment by a SAP and compliance with recommendations.

#### **4.4 Follow up**

- a. Drug and or alcohol testing on an unannounced basis for at least one year on return to duty. Frequency and duration of testing is determined by the SAP in consultation with management.

### **5. Training**

Greenview recognizes that employee education on substance abuse and on our Substance Abuse Prevention Policy is a critical step in achieving the objectives of the program.

### **5.1 Employee training**

- a. Employees will receive awareness education in regards to how this policy applies to everyone including: the risks of drug and alcohol use and their potential impact on safety in the workplace, consequences for policy violation, available resources for employee assistance services, explanation of the testing procedures and situations when testing will occur.

### **5.2 Management / Supervisor Training**

- a. Management will be given the above training as well as more specific training on how to recognize signs and symptoms of drug and alcohol use in the workplace and appropriate responses.

## **6. Maintaining a Valid Operator's License**

All employees that operate a motor vehicle on behalf of Greenview are required to maintain a valid operator's license. Any loss of driving privileges (license) must be reported to your supervisor. The employee will no longer be allowed to drive on behalf of Greenview for the term of their suspension. Loss of driving privileges includes temporary suspensions.

## **7. Collection of Specimens and Analysis**

A designated drug testing facility for Greenview will collect and process urine specimens for drug testing as required. Drug testing will be conducted according to US Dept. of Health & Human Services (HHS) standards in laboratories accredited by the Substance Abuse and Mental Health Services Administration (SAMHSA). The accredited laboratory will perform required testing with test results forwarded to a Medical Review Officer.

Alcohol screen testing will be with an approved saliva tester or breath alcohol test. All alcohol screening tests at .020 or higher will be confirmed with an approved Evidential Breath Alcohol Testing Device on the Conforming Products List (CPL).

## **8. Positive Test Procedures**

### **5.1 Positive alcohol test procedures**

- a. Employees with a confirmed breath alcohol concentration of .020 to .039 will be removed from duty immediately and will not be allowed to return to work until the following shift. The employee may be subject to corrective disciplinary action up to termination.
- b. Employees having a confirmed alcohol concentration of .040 or greater will be removed from duty/suspended or terminated.

## 5.2 Positive drug test procedures

- a. Employees who are positive on drug tests as verified by the MRO will be removed from duty / suspended.

## 5.3 Refusal to test

- a. No employee shall refuse to submit to a drug and or alcohol test required under this policy.
- b. No manager or supervisor shall permit an employee who refuses to submit for required testing to remain on duty.
- c. An employee who refuses to submit to a required test, tampers or attempts to tamper with a test sample or obstructs the testing process will be considered to have violated this policy. Positive test procedures will apply.

## 5.4 Removal from duty

- a. Employees removed from duty / suspended having a positive drug test verified by an MRO and or a confirmed alcohol concentration of .040 or greater will be required to attend a meeting with management who will review each case and provide written correspondence of the resources available in evaluating and resolving problems associated with the misuse of alcohol and or drugs, including the names, addresses and telephone numbers of SAP's. Where practical management will endeavor to meet or contact the employee the next working day and direction will be provided regarding the suspension and return to work choices.
- b. Any employee removed / suspended from duty having a positive drug test result verified by an MRO and or a confirmed alcohol concentration of .040 or greater shall be evaluated by a Substance Abuse Professional who shall determine what assistance, if any, the employee needs in resolving substance abuse issues.
- c. In order for this policy to be effective in ensuring that Greenview employees will perform their duties unimpaired by alcohol or drugs, the provisions of this policy must be enforced. Accordingly, where an employee violates any provision(s) of this policy, the employee may be subject to corrective disciplinary action, as appropriate, up to and including termination.

## 5.5 Self-Disclosure

- a. Greenview understands that an alcohol or drug dependency is a preventable and treatable condition and recognizes that an individual may want assistance. Employees are encouraged and required to voluntarily come forward or seek assistance on their own, without fear of reprisal. Greenview will do its utmost to assist the employee. An employee who comes forward seeking assistance will be treated as if



they had a positive drug and or alcohol test. Once an assessment has been completed a return to work plan can be formulated.

#### **5.6 Use of Medical Cannabis**

- a. An employee who is using or will be using Medical Cannabis will be removed and or suspended from safety sensitive duties pending the receipt of a clearance letter from the prescribing physician.
- b. Management will provide the employee with a letter of direction, copy of their job description, copy of their Physical Demands Analysis and a copy of the Provincial College of Physicians and Surgeons Guidelines for Prescribing Medical Cannabis.
- c. Return to safety sensitive duties is conditional on receiving a clearance letter from the prescribing physician who will indicate that they are aware of the employee's job description, physical demands analysis and that the Provincial College of Physicians and Surgeons Guidelines for Prescribing Medical Cannabis were followed, expected duration of the prescription requirement, frequency of use and that the prescribed medical cannabis will not interfere with the employee's ability to work in their safety sensitive position.
- d. Referral and or review may be considered at the discretion of management.
- e. The employee will be accommodated wherever feasible.

#### **5.7 Medical Review Officer Issued Safety Advisory**

- a. In the event of a reported positive drug test the MRO may determine that the donor has a legitimate drug / medical cannabis prescription; the positive result may be changed to a negative. If the MRO determines that the use of that particular prescribed drug / medical cannabis may compromise safety in the performance of a safety sensitive function the MRO will issue a "Safety Advisory" to the Designated Employer Representative (DER).
- b. The employee will be removed from duties and the use or pending use of Medical Cannabis guidelines will be followed when applicable.
- c. When a Safety Advisory is issued for a prescription drug other than cannabis the same procedure will apply.

### **9. Return to work after a positive test**

An employee cannot be returned to duties until he / she has been evaluated by an SAP, complied with recommendations, and has a negative result on a return to duty test and or a breath alcohol concentration less than .020. The employee must provide a written report from the SAP verifying the evaluation and any required treatment or provide a release document for the required information. The SAP will only release relevant information which will assist in returning the employee to their duties.

Follow up testing will be conducted to monitor the returning employee for no less than one year. The frequency of testing will be determined by the SAP in consultation with management and will be designed to assist the employee in remaining alcohol and or drug free at the work place.

**10. Confidentiality and Record Keeping**

All drug test results are confidential and are released by the MRO or designate to the DER or alternate. Alcohol test results are confidential and released by the testing Greenview to the Designated Employer Representative or alternate. The DER or alternate may release relevant information to Greenview decision makers as required. Confidential information from an SAP will be handled in a similar manner.

All records will be maintained in a locked and secure manner. Records will be kept separate from personnel files. Negative test results will be maintained for no less than one year with positive test results and SAP assessments maintained for a five-year period. A third-party administrator can maintain records on behalf of Greenview.

**11. Standards**

**Medical Review Officer**

Initial Test Analyte	Initial Test Cut-off Concentration	Confirmatory Test Analyte	Confirmatory Test Cut-off Concentration
Marijuana Metabolites	50 ng/mL	THCA	15 ng/mL
Cocaine Metabolites	150 ng/mL	Benzoyllecgonine	100 ng/mL
Codeine/Morphine	2000 ng/mL	Codeine Morphine	2000 ng/mL 2000 ng/mL
Hydrocodone/ Hydromorphone	300 ng/mL	Hydrocodone Hydromorphone	100 ng/mL 100 ng/mL
Oxycodone/ Oxymorphone	100 ng/mL	Oxycodone Oxymorphone	100 ng/mL 100 ng/mL
6-Acetylmorphine	10 ng/mL	6-Acetylmorphine	10 ng/mL
Phencyclidine	25 ng/mL	Phencyclidine	25 ng/mL

Amphetamine/ Methamphetamine	500 ng/mL	Amphetamine Methamphetamine	250 ng/mL 250 ng/mL
MDMA/MDA	500 ng/mL	MDMA <sup>1</sup> MDA <sup>2</sup>	250 ng/mL 250 ng/mL

**APPENDIX A**

**ANALYTES AND CUT-OFF LEVELS (URINE)**

The laboratory will use the cut-off concentration levels of the above chart for initial and confirmation drug tests. All cut-off concentrations are expressed in nanograms per milliliter (ng/mL).

**ANALYTES AND CUT-OFF LEVELS (ORAL FLUID)**

<b>Initial Test Analyte</b>	<b>Initial Test Cut-off Concentration</b>	<b>Confirmatory Test Analyte</b>	<b>Confirmatory Test Cut-off Concentration</b>
Marijuana Metabolites	4 ng/mL	THCA	2 ng/mL
Cocaine Metabolites	20 ng/mL	Benzoylcegonine	8 ng/mL
Opioids	40 ng/mL	-----	-----
Codeine/Morphine	-----	Codeine Morphine	40 ng/mL 40 ng/mL
Hydrocodone/ Hydromorphone	-----	Hydrocodone Hydromorphone	40 ng/mL 40 ng/mL
Oxycodone/ Oxymorphone	-----	Oxycodone Oxymorphone	40 ng/mL 40 ng/mL
6-Acetylmorphine	-----	6-Acetylmorphine	4 ng/mL
Phencyclidine	10 ng/mL	Phencyclidine	10 ng/mL
Amphetamine/ Methamphetamine	50 ng/mL	Amphetamine Methamphetamine	50 ng/mL 50 ng/mL
MDMA/MDA	-----	MDMA <sup>1</sup> MDA <sup>2</sup>	50 ng/mL 50 ng/mL

The laboratory will use the cut-off concentration levels of the above chart for initial and confirmation drug tests. All cut-off concentrations are expressed in nanograms per milliliter (ng/mL).