



USF Health - Morsani College of Medicine GME POLICY & PROCEDURE

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Scope: Applies to all University of South Florida Morsani College of Medicine (“USF MCOM”) residents and fellows (“Residents”) in Accreditation Council for Graduate Medical Education (“ACGME”) accredited and non-accredited/non-standard programs as appointed through the House Office Contract issued from the USF MCOM Graduate Medical Education Office (“GME Office”).

Background: The University of South Florida (“USF”) [Policy 0-610](#) (Drug-Free Workplace) prohibits the unlawful manufacture, distribution, possession or use of a controlled substance or alcohol on property or in connection with any activities of USF. This 0-610 policy is inclusive of federal law regarding the unlawful possession or use of controlled substances, most notably, but not limited to, marijuana. No Resident can report to work/class/duty impaired or while under the influence of illegal drugs or alcohol. The GME Office is committed to creating a professional and safe working environment, which includes a responsibility to the health, welfare, and safety of patients and others at the facilities where Residents train. To achieve this commitment, the GME Office requires that every Resident complete a urine drug screen as a condition of appointment or when required by educational affiliates. The GME Office also requires a Resident complete a urine drug screen when there is reasonable suspicion that the Resident is using or has used drugs or alcohol in violation of the University’s drug-free workplace policy. This GME Policy and Procedure supports USF Policy 0-610 and is in conformity with section 112.0455, Florida Statutes (the Drug-Free Workplace Act).

Policy: The GME Office has established policies and procedures to assist in evaluating whether potential and current Residents are eligible to participate in training programs. Individuals with a history of behavior that is inconsistent with the standard of ethical conduct required for Residents, or who may be impaired due to substance abuse, are not eligible for appointment or reappointment as Residents. Residents must give a truthful and comprehensive self-disclosure of any prior substance abuse and/or treatment as is required for licensure by the Florida Board of Medicine as part of this or any employment application, licensing, credentialing, privileging, or other training related process. Refusal to undergo any part of the drug screen process will render a Resident ineligible for appointment or continuation or be grounds for disciplinary action, up to and including termination. The appeal process outlined in GME-218 does not apply in the event of dismissal.

An attachment to this document defines the procedure and description of the drug testing procedure.

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Types of Testing

Start of a Residency or Fellowship Program or When Required by Educational Affiliates

As a condition of appointment as a Resident with GME, all incoming Residents and those Residents entering a new program must undergo a drug screen as defined below. Residents transitioning from a preliminary year position at USF to an advanced program at USF do not need to repeat the drug screen. This process also applies when required by educational affiliates. This process must be completed, and results verified prior to the training start date. Failure to receive results prior to the training start date will result in a delayed start, including a delayed payroll start date.

Reasonable Suspicion

Consistent with USF policy and Human Resources guidelines, a Resident may also be subject to testing where there is reasonable suspicion the Resident is impaired by alcohol or drugs or when required or requested by educational affiliates. “Reasonable suspicion” testing occurs when there is reason to believe that the Resident is using or has used drugs or alcohol in violation of the University’s Drug-Free Workplace Policy based on specific objective and articulable facts and observations and reasonable inferences drawn from those facts in light of experience. Among other things, facts, observations and inferences may be based upon:

- Overt signs and/or symptoms of impairment
- Observable phenomena while at work, such as direct observation of drug use or of the physical symptoms or manifestations of being under the influence of a drug
- Abnormal conduct or erratic behavior while at work
- Significant deterioration in work performance
- Information that an employee has caused, or contributed to, an accident while at work
- A report of drug use, provided by a reliable and credible source, which has been independently corroborated
- Evidence that the employee has used, possessed, sold, solicited, or transferred drugs while working, while on the employer’s premises, or while operating the employer’s vehicle, machinery or equipment
- Physical evidence of alcohol use in the workplace

Procedures:

Pre-employment (to include current Residents entering a new program or when required by educational affiliates) drug testing will be conducted on final selected candidates who have been offered employment in the Program. The cost of testing will be paid by USF. Prior to the pre-employment drug testing, candidates will be given a copy of the drug testing procedures. Employment offers are contingent upon a negative drug test result. Once a candidate is selected for a position covered by this procedure, the USF Health GME Office will provide instructions for scheduling an appointment with the drug test vendor. The candidate is responsible for meeting the testing

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appointment and must provide his/her own transportation to and from the testing facility.

Reasonable suspicion testing will be conducted based on a belief drawn from specific objective and articulable facts (and reasonable inferences drawn from those facts) that the resident is using or has used drugs or alcohol in violation of the Policy. Should reasonable suspicion arise, the procedures delineated in USF Policy 0-610 shall be adhered to.

Collection Facility and Testing

A urine test will be used for the initial and confirmation tests. All specimen collection and testing will be performed consistent with Florida law. Specimens are analyzed in an independent, licensed laboratory that utilizes criteria established by the United States Department of Health and Human Services as general guidelines for modeling drug testing program. Security of specimen collection, the collection site, chain of custody procedures, collection privacy and control, integrity and identity of the specimen, and transportation of the specimen to the laboratory will be performed in a manner which reasonably precludes specimen contamination or adulteration and will meet state rules and guidelines.

Reporting Over-the-Counter or Prescription Medications to Medical Review Officer

Residents and incoming Residents being tested will be given an opportunity to provide any information to the Medical Review Officer (MRO) which they consider relevant to the test, including identification of currently or recently used prescription or nonprescription medication or other relevant medical information. This information will be treated as medical information and afforded the appropriate confidentiality according to Florida and federal law. The information will be used to interpret test results and determine if the test is positive or negative. This information will be provided to the MRO in writing. Residents or incoming Residents have a right to consult the MRO for technical information regarding prescription and nonprescription drugs. A list of the most common medications which may alter or affect a drug test are provided in the document attached.

Consequences of Refusal to Test or of Positive Confirmed Drug Test Result

Residents or incoming Residents who refuse to test, fail to meet scheduled appointments, or engage in any action that clearly obstructs the testing process will not be hired or will be terminated. Residents or incoming Residents who test positive with a confirmed drug test will not be hired or may be terminated or referred to PRN.

A positive test is one that indicates the presence of illicit drugs. A Resident or incoming Resident who receives a positive confirmed drug test result may contest or explain the result to the Medical Review Officer (MRO) within five (5) working days after receiving written notification of the positive test result. If the Resident's or

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incoming Resident's explanation or challenge is unsatisfactory to the MRO, the MRO shall report a positive test result back to USF.

Within five (5) working days after receipt of a positive confirmed test result from the testing laboratory, the USF Health GME Office shall inform the Resident or incoming Resident in writing of such positive test result, the consequences of such results, and the options available to them. Within five (5) working days after receiving notice from the University of a positive confirmed test result, the Resident or incoming Resident may submit information to USF Health GME Office representative explaining or contesting the test result and why the results do not violate University policy and procedures. If the explanation or challenge is unsatisfactory to the University, the Resident or incoming Resident will receive a written explanation of why it was unsatisfactory, along with the report of positive results. A copy of the test results will be provided to the Resident or incoming Resident upon request.

As described in section 112.0455(14) and (15), Florida Statutes, the Residents or incoming Resident may contest the drug test result by administrative or legal challenge, and pursuant to law or to rules adopted by the Agency for Health Care Administration. The Resident or incoming Resident will be permitted to have a portion of the specimen retested, at the Resident's or incoming Resident's expense, at another laboratory chosen by drug screen vendor for retesting. The retest results will be considered final.

A Resident or incoming Resident may contest or appeal the drug test result to the Public Employees Relations Commission as provided by sections 112.0455(14) and (15), Florida Statutes.

It is the Resident's or incoming Resident's responsibility to notify the testing laboratory in writing of any administrative or civil action brought regarding the test results, to ensure the sample is retained until the case or appeal is resolved.

Dilute Negative Results

If a Dilute Negative result is received, it will be treated as a negative result. GME reserves the right to retest, in the future and without advance notice, any Resident whose urine drug screen result was Dilute Negative.

Outside the U.S.

Residents and incoming Residents who reside outside of the United States prior the start of training at USF must complete the urine drug screen as soon as possible after arriving in the U.S.

Record Keeping & Confidentiality

The USF Health GME Office will maintain records of the drug testing. All such records are confidential and will be retained/disposed of according to Florida law. To preserve confidentiality, USF Health GME Office will only release information to third parties with a written consent form signed voluntarily by the person tested, unless

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otherwise authorized by law, rule, or regulation. The consent form must contain, at a minimum, the name of the person who is authorized to obtain the information, the purpose of the disclosure, the precise information to be disclosed, the duration of the consent, and the signature of the person authorizing release of the information. Information may be disclosed to the decision-maker and to legal counsel in connection with proceedings arising from the results of a drug test.

Results of the drug screen will be available to USF administrative officials and affiliated educational sites for onboarding and credentialing purposes.

Employee Assistance Programs and Local Drug Rehabilitation Programs

The following is a representative sampling of names, addresses, and telephone numbers of employee assistance programs and local drug rehabilitation programs:

USF's Employee Assistance Program
Magellan Health Services
1-800-327-8705
<https://magellanascend.com/>

Resident Assistance Program
813-870-3344
<http://www.woodassociates.net/>

Florida PRN
800-888-8776
<https://flprn.org/>

Responsible Party
The GME Office

Procedure Action

Manages the drug screen process through a third-party vendor.

Sends incoming Resident or Resident entering a new training program instructions via the onboarding checklist about placing an order for the drug screen through the vendor's website. Any positive drug screen results will be referred to an Advisory Committee consisting of the GME HR administrator, Director of GME, and an attorney representative of the USF Office of General Counsel. The results will be reviewed on a case-by-case basis. Any confirmed positive result for an illegal substance or for a prescription medication that was obtained without a valid prescription will render the incoming Resident ineligible for appointment, and that

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information will be communicated to the incoming Resident and program director in writing.

If after reasonable suspicion testing a Resident is found in violation of USF Policy 0-610, the Resident may be referred to PRN or terminated.

DIO will make the final decision and will then communicate to the Resident and Program Director in writing.

Program Director

Collaborates with GME to ensure that USF HR procedures are followed when program witnesses or receives feedback regarding reasonable suspicion of drug or alcohol use.

In the program to which the Resident is/is to be appointed will also be informed of the drug screen results.

Monitors for and/or receives feedback regarding reasonable suspicion of drug or alcohol use and discusses with central GME office.

Follows any applicable PRN procedures.

Advisory Committee

Will review the results of the drug screen, as well as any corroborating evidence from the Board of Medicine application, and, as the applicable Program Director and/or Chair to determine whether the Resident should be appointed.

Will make a recommendation to the DIO.

APPROVED:



Senior Associate Dean, Graduate Medical Education/DIO

Date of Origin	Effective	Revision/GMEC Approval:	Originally Policy #
12/2015	12/2024	12/2016; 04/2019; 07/2020; 6/2024; 12/2024	GME-199-B



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Type of Testing

Drugs for Which USF Will Test

USF GME will conduct a 10-panel drug test. The list of drugs for which we test include Amphetamine (Methamphetamine), Barbiturates, Benzodiazepines, Cocaine, Marijuana, Methadone, Methaqualone, Opiates (Codeine & Morphine), Phencyclidine, and Propoxyphene, and a metabolite of any of the substances listed herein.

Alcohol Testing

In addition to the comprehensive 10-panel drug testing protocol outlined above, USF is committed to maintaining a safe and productive work environment. As part of this commitment, we have implemented a procedure for alcohol testing specifically tailored to situations where impairment is observed in the workplace.

The following is a list of the most common medications which may alter or affect an alcohol drug test:

Category	Examples
Alcohol	All liquid medications containing ethyl alcohol (ethanol). Please read the label for alcohol content. As an example, Vick's Nyquil is 25% (50 proof) ethyl alcohol, Comtrex is 20% (40 proof), Contact Severe Cold Formula Night Strength is 25% (50 proof) and Listerine is 26.9% (54 proof)
Amphetamines	Obetrol, Biphedamine, Desoxyn, Dexedrine, Didrex, Ionamine, Fastine
Cannabinoids	Marinol (Dronabinol, THC)
Cocaine	Cocaine HCl topical solution (Roxanne)
Phencyclidine	Not legal by prescription
Methaqualone	Not legal by prescription
Opiates	Paregoric, Parepectolin, Donnagel PG, Morphine, Tylenol with Codeine, Emprin with Codeine, APAP with Codeine, Aspirin with Codeine, Robitussin AC, Guaiatuss AC, Novahistine DH, Novahistine Expectorant, dilaudid (Hydromorphone), M-S Contin and Roxanol (morphine sulfate), Percodan, Vicodin, Tussi-organidin, etc.
Barbituates	Phenobarbital, Tuinal, Amytal, Nembutal, Seconal, Lotusate, Fiorinal, Fioricet, Esgic, Butisol, Mebral, Butabarbital, Butalbital, Phenrinin, Triad, etc.
Benzodiazepines	Ativan, Azene, Clonopin, dalmine, Diazepam, Librium, Xanax, Serax, Tranxene, Valium, Verstran, Halcion, Paxipam, Restoril, Centrax

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Category	Examples
Methadone	Dolphine, Metadose
Propoxyphene	Darvocet, Darvon N, Dolene, etc.

*Due to the large number of obscure brand names and constant marketing of new products, this list cannot and is not intended to be all-inclusive. For more information see

<https://ahca.myflorida.com/health-care-policy-and-oversight/bureau-of-health-facility-regulation/laboratory-and-in-home-services/forensic-toxicology-laboratories>

Testing Procedure

Unless otherwise directed from the GME Office, the following event will take place for the Resident drug testing process.

Create your CastleBranch Account

1. To begin the background check/drug screen process, you must create an account at www.castlebranch.com
2. In the Place Order field, enter the following package code specific to your organization: ui63
3. Verify the institution listed on your package is for the University of South Florida – Graduate Medical Education
4. Create your myCB account and place your order

Drug Screening

CastleBranch will register you to take your drug screening with a lab (e.g., LabCorp) in your area. CastleBranch will communicate your registration information to you either through your myCB account or via the email address you provided to them.

1. Print the registration information provided.
2. Go to a collection site with your registration information. No appointment is necessary (unless you prefer to make one directly with the collection site). Maintain a copy of your lab form receipt with your Specimen ID#.

The collection site will ship your specimen to the lab.

If the test is non-negative, it will be sent to a Medical Review Officer (MRO) to review. You will be contacted by the MRO if they need information that would impact the results of your test.

A drug screening report will be available to you and can be retrieved from the CastleBranch portal.

Date of Origin	Effective
04/2024	07/2024