



## UCF/HCA Healthcare GME Policy for Impaired Physicians and Substance Use (IV.H.2)



Purpose/Intent: Sponsoring institutions and programs must have written policies that describe how physician impairment is addressed, including that due to substance abuse. Physician impairment occurs when a substance or psychological disorder interferes with his/her ability to engage in professional activities competently with reasonable skill and safely. Faculty, staff, peers, or other individuals who suspect a trainee is suffering from a psychological or substance abuse problem are obligated to report such problems.

Policy Summary: The UCF/HCA Consortium GME programs (Consortium) will fully participate in the provisions of the Florida Medical Practice Act (F.S.458), the rules of the Board of Medicine, and Department of Professional Regulation. The Consortium supports the Florida Impaired Practitioners Program. The term “trainees” includes both residents and fellows.

### Procedures:

1. The purpose of the Professional Resource Network (PRN) Impaired Practitioners Program of Florida is to ensure the public health and safety by assisting ill practitioners who may suffer from conditions that lead to impairment, including substance abuse and chemical dependency, psychiatric illnesses, and behavioral disorders. Contact information for PRN is provided in the last section.
2. Education regarding recognition of substance abuse is included during orientation and residents are made aware of UCF and HCA policies (fatigue mitigation training includes substance abuse).
  - a) UCF and participating hospitals are drug-free workplaces. UCF policy prohibits unlawful manufacture, distribution, possession, or use of illegal and non-prescribed controlled substances or alcohol on UCF property or in conjunction with UCF activities (see <https://studenthealth.ucf.edu/drugfreepolicy/>.) HCA hospitals also prohibit all marijuana, including medicinal marijuana. Also prohibited are: a sale or possession with intent to distribute any drugs, theft or diversion of facility and/or patient medications, tampering or altering drug testing samples, and related behaviors (refer to HCA Substance Use policy for complete listing). **Trainees are not permitted to report to work while under the influence of alcohol, illegal drugs, or non-prescribed controlled substances. Trainees who fail to comply with these policies are subject to disciplinary action including termination.** UCF and all participating hospitals, including the Orlando VA Medical Center (VAMC), have the authority to request random specimens for drug and alcohol testing. Pre-employment drug testing is governed by Policy Regarding Health Screening for Trainees.
3. Testing
  - b) Trainees may be tested for drugs/alcohol randomly or for reasonable suspicion (following accidents, injuries, other circumstances). Test results are given to the local GME director who shares positive results with the UCF GME office and the Program Director; the hospital Chief Medical Officer may be notified also. Refusal for any reason to submit or consent to drug/alcohol screen requested by hospital personnel is prohibited and trainees are subject to disciplinary action.
  - c) Drug testing is performed via standard employee or occupational testing procedures at participating hospitals using standard testing and evidence protocols in accordance with

Florida law. If trainee is called for random testing, they will report to employee or occupational health as scheduled or as soon as possible.

- d) A trainee is presumed to be under the influence of alcohol if a blood test or other scientifically acceptable testing procedure shows a blood alcohol level of .04 or more.
  - e) Illegal and non-prescribed drugs may remain detectable by urine, blood and other testing for a substantial time. A trainee is prohibited from returning to work with a measurable quantity of marijuana, a measurable quantity of illegal substances, or a measurable quantity of non-prescribed controlled substances in blood and/or urine and may be placed on administrative leave with referral to PRN or be subject to disciplinary actions including termination of employment.
  - f) Recreational marijuana use is illegal in Florida. Marijuana THC and metabolites are detected in urine for a variable number of days after use and detection does not correlate accurately with impairment/intoxication. Use of marijuana during leave may lead to positive urine drug screen upon return to work and subsequent actions (placement on administrative leave and referral to PRN or other as applicable).
4. Trainees must notify their supervisor when taking a prescribed or over-the-counter drug that, based on drug profile, is likely to impair job performance during work hours. Clinical duties may be modified during this time period.
  5. Programs may refer trainees to PRN for suspected impairment (mental health, substance abuse, etc.) using a templated letter found in MedHub. This referral is not subject to appeal or grievance and trainees who do not comply are subject to termination from the program and UCF employment. Faculty, staff, peers, or other individuals who suspect a trainee is suffering from a psychological or substance abuse problem should either discuss their concerns with the Program Director or Associate Director, DIO, Associate DIO, Assistant DIO/ADME, or Chair or can make a referral directly to the Florida PRN. These concerns will be handled confidentially followed by a discreet investigation of concerns.
  6. Suspected substance abuse: the trainee will usually be placed on administrative leave and referred to PRN pending drug/alcohol testing and investigation. It is the intent of the UCF/HCA that all appropriate rules that govern the practice of medicine be strictly enforced. Within HCA hospitals, a supervisor who has reasonable suspicion of policy violations (possession of controlled substances or alcohol) may require a trainee to submit to an inspection or search.
  7. Once a referral to the PRN occurs, the trainee is required to undergo an independent evaluation by an approved provider coordinated by the PRN. Trainees are placed on administrative leave (usually up to six weeks) during initial evaluation by PRN and related treatment; longer periods require a leave of absence. Resumption of participation in clinical activity and in the residency program is contingent upon continued successful participation in the PRN program and requirements. All referrals to the PRN are confidential and are evaluated by the professionals of the PRN. Decisions about intervention, treatment and after care are determined by the PRN.
  8. Trainees who voluntarily self-report substance abuse will generally need to take a leave of absence from the GME program, and resumption in the program is dependent on successful rehabilitation and meeting any requirements set by either UCF COM or HCA facility.
  9. Incoming trainees who are currently under a monitoring plan for substance abuse will be referred to the PRN in conjunction with their Florida Board of Medicine Application.
  10. For trainees under a PRN contract, as long as the practitioner satisfactorily participates in the PRN program, no regulatory action would normally be anticipated by the Board of Medicine.

11. Continuation of the trainee in the program will be determined by consultation between the program director, the DIO/ADIO and the professionals at the PRN. Compliance with any resident under PRN referral or contract is monitored by the program director.
12. Position retention: Holding positions for 12 weeks is required for employees who meet the requirements of the Family Medical Leave Act. Trainees who are actively participating in PRN will have their program position held for up to 6 months. In the occasion trainee is not cleared to return to work within the 6 month period, they are in jeopardy of losing their position within the program and termination of employment from UCF.
13. Information on the Professionals Resource Network (PRN) Impaired Practitioner's Program: <http://www.flprn.org> email: admin@flprn.org, Phone 1-800-888-8PRN (8776), Address: P.O. Box 16510, Fernandina Beach, Florida 32035-1020.