

University of Central Florida – HCA Florida Healthcare GME Impaired Physicians and Substance Use Policy (IV.1.2.)

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 physician learner is suffering from a psychological or substance abuse problem are obligated to report such problems (ACGME IV.1.2).

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 “physician learners” includes both physician learners 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 physician learners 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). **Physician learners are not permitted to report to work while under the influence of alcohol, illegal drugs, or non-prescribed controlled substances. Physician learners 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 Physician learners.
3. Testing
 - b) Physician learners 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 physician learners 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 physician learner is called for random testing, they will report to employee or occupational health as scheduled or as soon as possible.
- d) A physician learner 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 physician learner 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. Physician learners 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 physician learners to PRN for suspected impairment (mental health, substance abuse, etc.) This referral is not subject to appeal or grievance process and physician learners who do not comply are subject to termination from the program and UCF employment. Such termination is not subject to appeal or grievance process. Physician learners are encouraged to recognize self-impairment and seek treatment.
6. Suspected substance abuse: the physician learner will generally be placed on administrative leave and referred to PRN pending drug/alcohol testing and investigation. Templatized language is available and UCF HR and GME office must be notified immediately of physician learner's PRN referral. 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 physician learner to submit to an inspection or search.
7. Once a referral to the PRN occurs, the physician learner is required to undergo an independent evaluation by an approved provider coordinated by the PRN. During initial evaluation by PRN, physician learner will generally be placed on paid administrative leave by UCF HR and GME leadership not to exceed 6 weeks from date of referral. If treatment is recommended, physician learner will need to request a medical leave of absence of up to 6 months (refer to leave policy, sick and vacation leave can be used for portion, remainder is unpaid). 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. Refusal to participate in treatment may result in termination from the program and UCF employment. Such termination is not subject to appeal or grievance process.
8. Incoming physician learners 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.
9. For physician learners 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.

10. Position retention: Holding positions for 12 weeks is required for employees who meet the requirements of the Family Medical Leave Act. Physician learners who are actively participating in PRN will have their program position held for up to 6 months. A physician learner who is not cleared to return to work within the 6 month period is at risk of non-renewal of contract or termination of employment from UCF (termination and non-renewal can be appealed).
11. 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