



## Drug and Alcohol-Free Workplace

### This Document Applies to the Following Entities/Locations:

All of the below entities/locations

- |   |  |  |  |
|---|--|--|--|
| <input checked="" type="checkbox"/> American Ambulance      | <input checked="" type="checkbox"/> American Prof. Ed. Serv. | <input type="checkbox"/> Backus Hospital                         | <input checked="" type="checkbox"/> Cedar Mountain Commons     |
| <input checked="" type="checkbox"/> Charlotte Hungerford    | <input checked="" type="checkbox"/> HHC Medical Group        | <input checked="" type="checkbox"/> Hartford Hospital            | <input checked="" type="checkbox"/> HHC System Support Office  |
| <input checked="" type="checkbox"/> HHC Independence @ Home | <input checked="" type="checkbox"/> HHC @ Home & Hospice     | <input checked="" type="checkbox"/> HOCC                         | <input checked="" type="checkbox"/> Hunters Ambulance          |
| <input checked="" type="checkbox"/> Jefferson House         | <input checked="" type="checkbox"/> MidState Medical Center  | <input checked="" type="checkbox"/> Mulberry Garden              | <input checked="" type="checkbox"/> Natchaug                   |
| <input checked="" type="checkbox"/> Rushford Center         | <input checked="" type="checkbox"/> Southington Care Center  | <input checked="" type="checkbox"/> St. Vincent's Medical Center | <input checked="" type="checkbox"/> The Orchards @ Southington |
| <input type="checkbox"/> Windham Hospital                   |  |  |  |

**Original Policy Date:** 10/1/2024

**Review Date:** Enter date

**Approved by:** Theresa Buss, VP Service Delivery & Operational Transformation

**Approval Date:** 9/1/2024

**Effective Date:** 10/1/2024

**Purpose:** To establish expectations for Hartford HealthCare (HHC) colleagues to maintain a safe and productive environment free from the influence of drugs or alcohol. HHC will adhere to the workplace requirements of the Drug-Free Workplace Act of 1988 and applicable Connecticut State statutes and regulations regarding testing of colleagues and applicants for drug and alcohol use.

**Scope:** This policy applies to all colleagues, vendors, volunteers, students, and temporary hires of HHC and its affiliates, unless otherwise governed by a different policy, contract, or collective bargaining agreement.

**Policy:** Colleagues shall not use, possess, distribute, dispense, elicit, manufacture, transfer, sell, or be under the influence of alcohol, marijuana, illegal drugs or prescription drugs while on HHC's premises or while conducting HHC business, unless doing so as part of their official duties. This prohibition includes HHC vehicles and personal vehicles being used for HHC business or parked on HHC property. Colleagues taking a prescribed medication while on duty must carry it in the container labeled by a licensed pharmacist or be prepared to produce it if asked.

Alcohol consumption is prohibited while on duty, including rest periods and meal periods, except at authorized HHC-sponsored events where alcohol is served. In the instance when a colleague is gifted alcohol, such as during holidays, should remain sealed and must not be consumed while on duty and be removed from the premises the same day.

HHC reserves the right to search its property, vehicles, and facilities, including work areas, desks, and lockers assigned to colleagues, at any time and for any reason, in accordance with state and local law. In addition, HHC reserves the right to search a colleague's person or personal property, such as but not limited to lunch boxes and bags, if such property is brought onto HHC premises or into HHC vehicles. HHC colleagues have no expectation of privacy in any item that is owned by HHC or is within HHC's property, including desks, offices, vehicles,

lockers, and facilities. HHC Public Safety, a Human Resources representative, or a supervisor shall conduct such searches when there is Reasonable Suspicion to believe that a colleague may be in possession of alcohol or drugs or if a colleague's judgement, job performance or the safety of others may be affected by the use of drugs or alcohol. HHC Public Safety, a Human Resources representative, or a supervisor may confiscate any item that violates this policy, violates any law or other HHC policy, or otherwise poses a threat to the safety of HHC, its colleagues, patients, or property, including campuses or vehicles.

**Pre-employment Testing:** HHC requires all colleagues accepted for employment to submit to a post-offer, pre-employment drug and alcohol screening as part of the employment process. All offers of employment are contingent on the satisfactory results of the drug screening. Prospective colleagues who test positive for drug usage may be denied employment.

**Reasonable Suspicion Testing:** All colleagues are required to report to work and be on-duty in a mental and physical condition that allows them to safely perform the essential functions of their job free from the effects of alcohol or drugs. HHC may require a colleague to submit to a drug screening if HHC has Reasonable Suspicion that the employee is under the influence of drugs or alcohol which adversely affects or could adversely affect such colleague's job performance. Any colleague who demonstrates signs of impairment may be referred for alcohol and/or drug screening in accordance with State and local law.

Reasonable Suspicion testing may result from one of the following examples, but is not limited to:

- a. Specific, personal and articulable observations concerning the appearance, odor, behavior, speech or performance of the individual; or
- b. Violation of a safety rule, or other unsafe work incident which, after further investigation of the individual's behavior, leads the [director/supervisor] to believe that the individual's functioning is impaired; or
- c. Other physical circumstantial or contemporaneous indicators of impairment.

In the spirit of a just culture of safety and wellbeing, any person may report suspicion of impairment to the colleague's supervisor, human resources or to the compliance hotline. There shall be no retaliation or repercussions towards individuals who have reported such concerns, in good faith.

Colleagues will not be permitted to work while "under the influence" of drugs or alcohol. The colleague will be placed on a paid administrative suspension while being evaluated and may be referred to the Colleague Assistance Program (EAP). Any colleague who holds a professional license may be referred to HAVEN or reported to the body that issues the license.

Failure to submit to a reasonable suspicion alcohol or drug screening will be deemed a positive result and may result in disciplinary action, up to and including separation of employment.

**Criminal drug convictions:** Colleagues must notify Human Resources of any on or off duty criminal drug conviction or other legal sanction, including arrest or charge, for drug or alcohol related offenses within five days of such a conviction or sanction. Failure to properly notify Human Resources may result in disciplinary action up to and including termination. After considering the circumstances of the crime, the rehabilitation program and/or sentencing imposed as well as the individual's position requirements, actions such as monitoring, rehabilitation, documented warning, transfer, suspension or termination of employment may

be taken at the organization's discretion.

**Confidentiality/Privacy:** Records of drug and alcohol tests will be treated confidentially and kept separate from existing department and personnel files; this information can be shared only on a strict "need to know" basis.

**Disciplinary Action:** Failure to adhere to this policy may result in disciplinary action, up to and including separation of employment, or withdrawal of offer of employment. Policy violations include refusal of alcohol and/or drug screening or adulterating, tampering with or interfering with accurate testing.

**Guideline:** HHC may revise, supplement, or rescind this (and any other) policy at any time as it deems appropriate in its sole and absolute discretion, without prior notice to colleagues. This policy does not constitute a contract of employment and does not in any way limit or modify colleagues' at-will employment status. This policy does not supersede the terms of any collective bargaining agreements or employment contracts.

**Definitions:**

1. **Drugs:** Marijuana and illegal narcotics such as cocaine, amphetamines, opiates, and phencyclidine.
2. **On-duty:** all times a colleague is working or required to be ready to work, whether paid or unpaid.
3. **Reasonable Suspicion:** an objectively justifiable suspicion that is based on specific facts or circumstances and that justifies an evaluation
4. **HAVEN:** Health Assistance InterVention Education Network, Connecticut's confidential health program for healthcare professionals.

**Keywords:** none listed

**Appendices:** N/A

**Required information for all Documents**

**Content Expert/Department:** Human Resources

**Related Documents:** Entity specific Substance Abuse Policy for Commercial Vehicle Drivers Policy,  
Transportation Policy  
Entity specific Fitness for Duty Policies

<b>Replaced Documents:</b>	Select an Entity. Select an Entity. Select an Entity. Select an Entity.	Enter the name of the replaced document or N/A Enter the name of the replaced document or N/A Enter the name of the replaced document or N/A Enter the name of the replaced document or N/A
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**References:**

Colleague Well-Being  
HHC Colleague Assistance Program  
Compliance hotline 1-855-442-6241  
Code of Conduct  
HAVEN

**Review Period:** Three Years