

Policy Number	UME.HS.102
Policy Title	Drug Screening of MD and Dual Degree (with MD) Students
Effective Date	August 2020
Last Revision Date (if any)	
Scope	Students
LCME Element(s) (if any)	

## **Drug Screening of MD and Dual Degree (with MD) Students**

### **I. PURPOSE**

The Perelman School of Medicine (PSOM) is committed to providing the highest quality education and to promoting professionalism throughout Penn Medicine. The purpose of this policy is to ensure all learners entrusted with the health, safety, and welfare of patients learn and serve in the clinical environment with good judgment and ethical behavior. PSOM has a responsibility to guarantee that students are functioning free from the influence of illicit or illegal substances as they serve within teams, as learners, and providers of clinical care. The use of controlled (unless prescribed by a clinician) or illegal substances, including marijuana (unless prescribed by a clinician), and the abuse of alcohol is prohibited.

In addition to promoting safe and high-quality patient care, this policy provides an opportunity to identify students who may need support, treatment and/or counseling.

### **II. SCOPE**

Drug screening is applicable to students accepted to and/or enrolled in any MD degree program beginning August 2020.

### **III. POLICY**

As students begin interacting with patients on Day 1 of school, drug testing must be completed prior to matriculation. Once an applicant commits to attending PSOM, they will have 2 weeks to complete the testing, as is detailed in acceptance letters. Drug testing will be administered by *Certiphi Screening (Certiphi)*.

Hospitals are accredited by the Joint Commission (JC) and must maintain compliance with all current rules, regulations, and standards. JC standard HR 1.20 requires that all individuals involved in the delivery of health care must comply with applicable health screening requirements established by organizations. As such, anyone who is involved with patient care, including PSOM students, will be asked to comply with these hospital regulations, which may include testing for drugs. Therefore, drug testing must be completed prior to matriculation, and will be required again before students are allowed to begin clerkships. It is also likely that students taking specific electives will be required to complete additional testing. Unexcused positive results prior to the first day of school may subject incoming students to denial of medical school matriculation and revocation of admission; this decision will be made by the Executive Committee on Admissions. Students with unexcused positive tests while already matriculated will be placed on administrative leave pending review by the Student Standards Committee (SSC) or, at SSC's discretion, a subcommittee, and will likely be referred to a state mandated treatment program.

Applicants/students must comply with this process as they must also comply with all PSOM policies and procedures. Failure to comply with school policies may result in disciplinary action up to and including suspension of all educational and clinical activities, and possible dismissal from PSOM.

There are limited, additional times when drug/alcohol testing may be requested of a student and apply only to the following circumstances:

- As determined through an administrative evaluation when required, after referral to Student Intervention Services at the University of Pennsylvania, due to serious concerns about substance misuse issues, or alarming behaviors that suggest possible substance abuse.
- As part of a mandated monitoring program for applicants/students with previous substance abuse, or positive drug tests during PSOM matriculation, that have been brought to the attention of SSC.

## **IV. PROCEDURE**

### **Administration of Screening:**

The Drug Screening Test will be administered through a single-source, third party vendor, *Certiphi*. The screening service will control data management/administration/reporting, specimen collection and laboratory services. *Certiphi* will provide a list of collection sites nearest to applicants/students.

*Certiphi* employs Medical Review Officers (MROs) who will review the results from the lab to check if the screening was positive for any drugs.

Applicants/students will be provided with a list of collection sites, and will be responsible for making an appointment as necessary. The applicant/student must also complete all legal release forms required for PSOM to receive the laboratory report. Results from a laboratory other than one designated by PSOM through *Certiphi* will not be accepted. Payment for screenings is included in the fees charged with tuition.

### **Drug Screen Results:**

Negative: If the test is negative for screened substances, the result is sent to the Chief Operating Officer for Medical Education at PSOM .

Positive or NON-negative: If the test is positive or NON-negative, then the MRO contacts the applicant/student up to three times, once per business day, to inquire if the applicant/student is on prescription medication. The MRO calls, e-mails, and calls again to get in touch with the applicant/student. If the applicant/student does not answer or respond to the MRO after three attempts, then a positive result will be sent to the Chief Operating Officer for Medical Education at PSOM. If the applicant/student answers the MRO and can provide the current prescription(s) for medication(s) to justify the screening results, the MRO will review the information and, if the result is justified by a current prescription, then the report is updated as a negative test result for the positive substances and submitted to the Chief Operating Officer for Medical Education at PSOM. If the applicant/student cannot provide a prescription medication to justify the test findings, the results are considered positive and sent to the Chief Operating Officer for Medical Education at PSOM. This process ensures that the results of the drug screenings are as accurate as possible while accounting for any prescription medication(s) the applicant/student is using under medical supervision, while maintaining full HIPAA compliance. PSOM will only receive a positive result if a medical explanation is not received and approved by the MRO.

Drug Screen Result other than Positive or Negative: A test result that is neither positive nor negative includes, but is not limited to: Negative Dilute, Positive Dilute, Positive No Contact, or Cancelled Specimen. If the applicant/student's drug screen result is neither positive nor negative, then the test must be repeated at the applicant/students' expense.

If an applicant/student has a positive drug screen, they will not be permitted to matriculate at PSOM until the Chief Operating Officer for Medical Education at PSOM reviews the case, at which time the applicant/student will be able to explain the positive result. A positive result could result in revocation of admission to PSOM. Applicants/students testing positive will be evaluated prior to matriculation and may be referred to an identified, independent expert for evaluation and treatment recommendations.

## **V. POLICY AUTHOR(S)**

Office of the Senior Vice Dean for Medical Education

The Policy Committee

## **VI. GOVERNING BODY**

The Module Leaders

## **VII. POLICY HISTORY**

<b>Date</b>	<b>Change</b>
March 2020	Created
August 2020	Approved and Implemented