



Basic Guideline: The Centers for Independence (CFI) is genuinely concerned about the health and well-being of its employees and is committed to providing its employees with a safe and productive workplace. Additionally, CFI is a federal contractor, and is required to maintain a drug-free workplace in compliance with the Drug-Free Workplace Act of 1988 (the “Act”). For these reasons, CFI has adopted this comprehensive drug/alcohol abuse policy and procedures for its enforcement.

Approval and Responsibilities: This Rule is maintained by the Human Resources department and approved by the Vice President of Human Resources.

Rules: Entering the organization's property constitutes consent to searches and inspections. If an individual is suspected of violating the drug-free workplace policy, they may be asked to submit to a search or inspection at any time. Searches can be conducted of pockets and clothing, lockers, wallets, purses, briefcases and lunchboxes, desks, workstations, vehicles, and equipment.

Engaging in any of the following while working or at any of CFI’s sites during working hours (including lunch and break), while on CFI premises, or while operating or riding in an CFI vehicle will result in discharge:

- Consumption, possession, transmittal, or receipt of intoxicating beverages
- Unlawful manufacture, distribution, dispensing, receipt, possession or use of controlled substances or drug paraphernalia.
- Reporting for work/working under the influence of intoxicating beverages, controlled substances, prescribed or over-the-counter medications. This includes those cases having side effects which interfere with the safe performance of work duties, in which case the individual taking such medications should immediately inform their supervisor and will be evaluated.

Testing:

All drug-testing information will be maintained in separate confidential records. Testing will be conducted under the following circumstances:

- Candidates who’ve been extended an offer of employment must pass a pre-employment drug test before a hiring decision will become final and applicants who refuse to consent will not be considered for employment. This applies to CFI and affiliates with the exception of MCFI Home Care.
- Employees and clients are subject to testing when CFI reasonably suspects that the individual may be using or under the influence of drugs or alcohol in violation of this policy. Reasonable suspicion may be found in circumstances including, but not limited to, physical appearance, odor, erratic behavior, unpredictable mood swings, poor performance, unsafe practices or violations of any other CFI policies.
- Testing will also be required as part of the investigation of a work-related accident/injury or “near accident” causing property damage or personal injury or in which, in the judgment of CFI’s

management, safety precautions were not adequately followed, or careless acts were performed.

- Additionally, post-treatment random testing may be required as determined by CFI in conjunction with a treatment program, and random testing may be implemented in general as CFI deems appropriate.

Cooperation:

- Switching or adulterating a urine, blood or other sample used for testing, refusing to submit a urine, blood or other sample for testing when requested by CFI, or any other action evidencing a refusal to fully cooperate in the collection/testing process (including refusal to sign an authorization form for the testing) will constitute grounds for imposing discipline on an employee, up to and including discharge. Refusal or failure to submit to testing will be treated as a positive test result and may result in immediate termination of employment.

Assistance:

As part of its drug-free awareness program, CFI has an Employee Assistance Program to provide and assist with information related to obtaining drug/alcohol rehabilitation and counseling. Any employee may voluntarily come forward to the Human Resources Representative to seek assistance with substance or alcohol abuse concerns. The Human Resources Representative will evaluate any threat to workplace health and safety and identify appropriate means to address any such issues. The Human Resources Representative may refer the employee to the Employee Assistance Program, which employees may alternatively contact directly.

Shared Responsibility:

A safe and productive drug-free workplace is achieved through cooperation and shared responsibility. Both employees and management have important roles to play. All employees are required to not report to work or be subject to duty while their ability to perform job duties is impaired due to on or off-duty use of alcohol or other drugs.

- In addition, employees are encouraged to:
 - Be concerned about working in a safe environment.
 - Support fellow workers in seeking help.
 - Use the Employee Assistance Program.
 - Report dangerous behavior to their supervisor.

- It is the supervisor's responsibility to:
 - Inform employees of the drug-free workplace policy.
 - Observe employee performance.
 - Investigate reports of dangerous practices.
 - Document negative changes and problems in performance.
 - Counsel employees as to expected performance improvement.
 - Refer employees to the Employee Assistance Program.

- Clearly state consequences of policy violations.
- Communication: Communicating our drug-free workplace policy to both supervisors and employees is critical to our success. To ensure all employees are aware of their role in supporting our drug-free workplace program:
 - All employees will receive a written copy of this rule.
 - The rule will be reviewed in orientation sessions with new employees.
 - The rule and assistance programs will be reviewed at safety meetings.
 - All employees will receive an update of the rule annually with their paychecks.
 - Posters and brochures will be available at all locations.
 - Education about the dangers of alcohol and drug use and the availability of help will be provided to all employees.

Nothing contained within this work rule shall limit the Agency's rights to implement random testing, post-accident testing or reasonable cause drug or alcohol testing.

References:

- Policy 3: Human Resources
- Policy 9: Health and Safety