



OFFICE OF POLICY MANAGEMENT
The UNIVERSITY of OKLAHOMA

MEMORANDUM

*Approved
 [Signature]
 7/31/23*

To: Gary E. Raskob, Ph.D.
 Senior Vice President and Provost

From: Jennifer A. Hembree, Ed.D.
 Director of Policy

Date: July 31, 2023

Subject: OUHSC Student Drug Screening Policy

Healthcare providers are entrusted with patients' health, safety, and welfare; have access to confidential and sensitive information; and operate in settings that require good judgment and ethical behavior. Thus, assessing a student's or accepted applicant's suitability to function in a clinical environment is imperative to promote the highest level of integrity in health care services.

Clinical Experiences are an essential element in specific degree programs' curricula. However, patient safety concerns have led many healthcare institutions and clinical facilities to require drug testing of healthcare providers. In addition to the University of Oklahoma's (OU) belief that this practice is an appropriate patient safety decision, drug testing is now a prerequisite for many facilities to accept student assignments. This policy allows OU to balance the needs of students while protecting the interests of its patients and those of any affiliated healthcare facilities. This policy will also enable OU to:

1. meet the contractual obligations contained in affiliation agreements between the University of Oklahoma Health Sciences Center (OUHSC) and various healthcare facilities
2. perform due diligence and competency assessment of all individuals who may have contact with patients, including research participants
3. ensure uniform compliance with accreditation standards and agency regulations regarding human resources management
4. meet the public demands of greater diligence in light of the national reports on deaths resulting from medical malpractice and medical errors.

This policy outlines that OU requires all students and accepted applicants for OUHSC programs to undergo drug screening to participate in any clinical experience.

The following individuals have reviewed this policy:

Gillian Air	Amy E Tucker	Carla S Hartsfield
Chris S. Candler	Sara K. Vesely	Chad Douglas
Kevin A. Fitzgerald	Mark L Britton	Chris Candler
Joseph C Geresi	Teresa Scordino	John Zubialde
Kevin L. Haney	Christopher M. Kobza	Sherri Baker
Jeanne O. Hayes	Gage Paine	Logan Lockhart
Wade M Hensley	Emma J. Kientz	Kate Stanton
Eric W. Howard	Amy C Costner-Lark	Jill Raines
Ken Randall	Valerie N. Williams	Kim Graziano
Michael J. Smith	Rachel K McCombs	

The OUHSC Faculty Senate has endorsed this policy, and the OUHSC Staff Senate has been informed of this policy.

The Office of Policy Management, on behalf of the Office of the Vice Provost for Academic Affairs and Faculty Development, asks to adopt the OUHSC Student Drug Screening Policy. This policy will be implemented upon Senior Vice President and Provost Raskob's signature.

JAH

cc: Valerie N. Williams, Vice Provost for Academic Affairs & Faculty Development
 Jill Raines, Vice Provost for Health Sciences Administration



OUHSC Student Drug Screening Policy

I. Purpose

Healthcare providers are entrusted with patients' health, safety, and welfare; have access to confidential and sensitive information; and operate in settings that require good judgment and ethical behavior. Thus, assessing a student's or accepted applicant's suitability to function in a clinical environment is imperative to promote the highest level of integrity in health care services.

Clinical Experiences are an essential element in specific degree programs' curricula. Patient safety concerns have led many healthcare institutions and clinical facilities to require drug screening of healthcare providers. In addition to the University of Oklahoma's (OU) belief that this is an appropriate patient safety decision, drug screening is now a prerequisite for many facilities to accept student assignments. This policy allows OU to balance the needs of students while protecting the interests of its patients and any affiliated healthcare facilities. This policy also will enable OU to (a) meet the contractual obligations contained in affiliation agreements between the University of Oklahoma Health Sciences Center (OUHSC) and the various healthcare facilities; (b) perform due diligence and competency assessment of all individuals who may have contact with patients (including research participants); (c) ensure uniform compliance with accreditation standards and agency regulations pertaining to human resource management; and (d) meet the public demands of greater diligence in light of the national reports on deaths resulting from medical malpractice and medical errors.

II. Scope

This policy applies to all OUHSC-accepted applicants and students admitted to designated degree programs that include or may include a Clinical Experience at a healthcare facility that requires drug screening as a condition of its affiliation with OU. Students should check with their college and/or degree program for specific requirements.

III. Definitions

A. Clinical Experience

Clinical and observational rotations and any other clinical-based experiential learning.

B. Offense:

Any instance in which a drug screening report shows a positive for one or more drugs screened and for which the screened individual cannot demonstrate a valid medical explanation.

IV. Responsible Office

The Office of the OUHSC Senior Vice President and Provost is responsible for administering and ensuring compliance with this policy.

V. Policy

It is the policy of OUHSC that drug screening is required of all accepted applicants and students in designated programs. As applicable, accepted applicants and students who do not pass the drug screening may be unable to complete degree requirements or may be denied admission to or suspended or dismissed from the degree program.

Policy Level: 5

Approval Authority: Health Sciences Center Senior Vice President and Provost

Date of Last Review:

Date of Approval:

Date of Next Review:

Subject Matter: Academic Affairs

Signature:



VI. Procedures

- A. The following procedures apply to all accepted applicants and current students in a clinical program.
- B. Timing and Procedures of the Drug Screening
1. Accepted Applicants: Accepted applicants in designated programs must complete the following prior to the start of classes:
 - i. Review the necessary procedures and consent forms provided by their respective college/program.
 - ii. Complete and sign the drug screening vendor's consent and release form and return the form to the drug screening vendor.
 - iii. Successfully pass the drug screen with sufficient time for the vendor to provide clearance documentation to the respective college/program designee. This may require time for re-screening in cases where specimens are diluted. For more information on what constitutes successfully passing the drug screen, see "Reporting of Findings" below.
 - iv. If an accepted applicant fails to complete the above prior to the first day of classes, the accepted applicant may not be allowed to begin classes and may jeopardize admission status to the respective college/program.
 2. Current Students
 - i. Current students in designated programs will be drug screened at the beginning of each academic year or more frequently if required by the clinical rotation site or by OUHSC.
 - ii. Students who need to complete drug screening will be provided with the necessary procedures and consent forms for the required drug screening by the respective college/program designee.
 - iii. Students who fail to adhere to the drug screening deadline set by their college/program may be suspended from all classes or clinical rotations until the approved vendor provides OUHSC with clearance documentation to the college/program designee.
- C. Identification of Vendors:
OUHSC will designate an approved vendor(s) to perform the drug screenings. The vendor's information will be listed in the [Student Handbook](#). Results from any company or government entity other than those designated by OUHSC will not be accepted.
- D. Allocation of Cost:
Accepted applicants and students must pay the cost of the drug screenings. These costs cannot be charged to an individual's Bursar account.
- E. Period of Validity:
Drug screening will generally be honored by OUHSC for a period of one year except as noted in Section VI.B.2.i. Students returning from a Leave of Absence may be required to re-screening before they can re-enroll in any courses or resume clinical responsibility. OUHSC considers a student on Leave of Absence to be in continuous enrollment.
- F. Drugs Screened:
The drug screening shall screen for various illicit or otherwise controlled substances as dictated by each college/program. This shall include screens for amphetamines, barbiturates, benzodiazepines, cocaine, opioids (including opiates), and any other controlled substance as identified by the college/program. Drug screenings may also include screens for substances that applicants or enrolled students take



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pursuant to authorized prescriptions from licensed prescribers or pursuant to a valid Oklahoma Medical Marijuana License.

G. Reporting of Findings and Accepted Applicants'/Students' Access to Drug Screening Report:

1. Students with a positive drug screen will have an opportunity to consult with a Medical Review Officer provided by the vendor, to verify whether there is a valid medical explanation for the screening results. Applicants and students who have a valid prescription can provide that prescription to the Medical Review Officer.
2. Positive screenings with valid medical explanations will not constitute offenses under this policy. However, students may not be able to participate at certain clinical sites and must comply with the rules of each site.
3. If the vendor's Medical Review Officer determines that there is a valid medical explanation for the screening results, the vendor will notify the college/program designee of a clear screening. If the Medical Review Officer determines that there is not a valid medical explanation for the positive screen, then the screen results will stand.
4. College/Program designee will be notified about all accepted applicants and students who screen positive for marijuana (THC). Accepted applicants and students who have a valid Medical Marijuana license will have an opportunity to provide that information to their college/program designee
5. The vendor will provide the respective college/program designee with a list of those students who passed a drug screen. The vendor will also provide the accepted applicant/student with the results of the drug screening report.
6. Should the vendor reject the screening specimen (due to dilution, adulteration, or other reasons), thereby precluding an accurate drug screen, the accepted applicant/student will be required to complete and successfully pass a new drug screen, at the individual's expense, prior to the start of classes or clinical rotations.
7. Any appeal right of a positive screen test solely between the accepted applicant/student, the Medical Review Officer, and the vendor.

H. Positive Drug Screen:

1. Accepted Applicants:

Accepted applicants with a positive drug screen may be allowed to begin classes only once the vendor provides clearance documentation to the college/program designee. Colleges/Programs may defer admission to a future semester or require the individual to reapply for a future semester unless cleared by the drug screening vendor. Accepted applicants with a positive drug screen who eventually enroll in an OUHSC program will be considered to have committed their first offense. Students should be aware that failure to pass drug screening may prevent the student from participating in certain Clinical Experiences and may delay the student's completion of the degree program requirements or prevent the student from completing the degree program.
2. Current Students
 - i. First Offense

Any student with a positive drug screen first Offense may be suspended for the remainder of the semester and be administratively withdrawn from all courses and/or may be suspended for the following semester at the program's discretion.

 - a. OUHSC may require random drug screenings for the remainder of the student's enrollment. Colleges/programs may impose additional



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- sanctions, and students are encouraged to check with their colleges/programs for specific details on these possible additional sanctions.
- b. Students who are suspended may not be able to progress to the next semester based on specific program requirements (i.e., many programs are “lock-step” with completion of one semester as a pre-requisite for progression to the next semester.)
 - c. Students may re-enroll at the discretion of the college/program contingent upon OUHSC’s receipt of clearance documentation from the vendor and dependent upon the curriculum of that program.
- ii. Second Offense:
Any student who has a second Offense, or a student who has an Offense after a previous Offense as an accepted applicant, will be dismissed from the college/program.
- I. Medical Marijuana:
Accepted applicants and students should note that a positive screen for marijuana (THC) may prohibit a student from attending a rotation or experience at a clinical site in compliance and consistent with the clinical site’s policies. Students unable to complete their Clinical Experiences due to this prohibition may be unable to complete their program. Accepted applicants and students are encouraged to visit with their college/program prior to matriculation for more information. In addition, OU is legally bound to comply with the Federal Drug-Free Schools and Communities Act. As required by the Act, students are not permitted to use (smoke or consume), possess, distribute, or cultivate marijuana for any reason on OU campuses, even if they have a medical marijuana license.
 - J. Falsification of Information:
Falsification of information will result in immediate removal from the accepted applicant list or dismissal from the degree program.
 - K. Confidentiality of Records:
Drug screening reports and all records pertaining to the individual’s results are confidential with restricted access. However, the results and records are subject to the Family Educational Rights and Privacy Act [FERPA] regulations. For additional information on FERPA, please see <http://www.ed.gov/policy/gen/guid/fpco/ferpa/index.html>.
 - L. Recordkeeping:
Reports and related records (both electronic and paper media) are retained in a secure location and are maintained in the respective college/program office for the timeframe listed below, unless otherwise required by law.
 1. Current Students – 5 years
 2. Accepted Applicants – 2 years (provided no legal complaint)