

CHEMICAL IMPAIRMENT POLICY

Responsible administrator: Associate Dean for Academic Programs

Last updated/reviewed: 5/13/2019

Health care professionals have a responsibility to their patients to practice their professions free from chemical impairment or dependency. Student pharmacists in the Harrison School of Pharmacy (HSOP) begin providing care to patients from the time they enter the HSOP and, thus, are viewed as members of the pharmacy profession who are in training. Since providing patient care while impaired by chemical substances has the potential for harming patients, it is the responsibility of faculty, staff and student pharmacists to intervene at times when it appears that a student pharmacist may be chemically impaired. Furthermore, the HSOP supports the prerogative of health care entities that serve as training sites for our students to require drug testing of students prior to the start of clinical experiences.

Both substance abuse and chemical dependency can impair one's ability to provide appropriate care to patients. Substance abuse refers to harmful use of a psychoactive substance where the use continues despite continuing negative consequences such as failure to meet home, work or school obligations; hazardous behaviors such as driving while intoxicated; or reoccurring legal difficulties. Chemical dependency is defined as psychological or physiological dependence on a psychoactive substance. Potential substances include alcohol, prescription and OTC drugs (obtained legally or illegally), and street drugs.

Within the HSOP, substance abuse and chemical dependency are viewed as diseases with physiological, psychosocial, and behavioral components. Both are amenable to treatment, and recovery is possible for individuals who complete appropriate treatment programs and assume personal responsibility for management of their disease.

This purpose of this policy is to facilitate the identification of student pharmacists who may be chemically impaired, to promote appropriate treatment and recovery of these individuals, and to prevent patient harm from occurring. At least 10 percent of pharmacists will become chemically impaired at least some time during their careers. Professional organizations and licensing boards have become increasingly concerned about the problem of impaired pharmacists and have developed effective assistance programs. Pharmacists who are successful in treatment and recovery programs often have the opportunity to reenter practice as long as they continue to be successful in their recovery. The treatment and recovery process for pharmacists must assure appropriate long term monitoring to provide appropriate accountability and safeguards for patients. This same principle applies to student pharmacists where follow up and monitoring must extend beyond their years in pharmacy school and into at least the first several years of practice as a licensed practitioner. Since earlier treatment of substance abuse or dependence is associated with a more favorable outcome, student pharmacists who suspect that they or their colleagues may be chemically impaired are encouraged to report themselves or others so that treatment can begin before their disease progresses. Student pharmacists who are chemically impaired will be assisted with treatment, but suspended from the HSOP and not allowed to return until such time as they have demonstrated recovery to the point where patient care will not be endangered.

All HSOP student pharmacists are required to be licensed as interns by the Alabama Board of Pharmacy and are accountable to the Board of Pharmacy's Standards through the Board's Wellness Program. Moreover, the RIP program is specifically designed for the specific needs of impaired pharmacists and student pharmacists. Therefore, all treatment, recovery, and long-term monitoring of HSOP student pharmacists will be conducted by the Wellness Program. Student pharmacists who are found to be chemically impaired will be asked to voluntarily surrender their internship licenses and will have their license revoked by the Board if they fail to surrender it voluntarily. Student pharmacists with revoked internship licenses will not be allowed to reenter the HSOP until such time as the Board of Pharmacy reinstates their license. The HSOP also supports the Board and law enforcement agencies in taking appropriate action in cases where student pharmacists may have violated federal or state laws.

Procedures:

1. HSOP student pharmacists who suspect they may be chemically impaired are encouraged to voluntarily report themselves to the Associate Dean for Academic Programs (ADAP), so that appropriate evaluation and treatment may be begun.
2. It is the professional responsibility of all HSOP faculty, staff, and student pharmacists to report or intervene in cases where they suspect a student pharmacist to be chemically impaired. The ADAP should be notified in those cases where student pharmacist impairment is suspected. Conduct which may suggest chemical impairment includes: a decline in academic performance, changes in behavior, failure to carry out professional responsibilities, repeated tardiness or absenteeism, psychomotor deficiencies, and observed intoxication.
3. The ADAP will investigate student pharmacists who are suspected of being chemically impaired. The ADAP will meet with each suspected student pharmacist and present the findings that support possible chemical impairment, including positive results on drug screens. At this meeting, student pharmacists will be provided the opportunity to respond to the ADAP's findings related to chemical impairment and to present other information pertinent to this matter. The HSOP reserves the right to require student pharmacists to undergo on-demand drug screening as part of this initial evaluation, when findings exist that are suggestive of chemical impairment.
4. After the ADAP's initial evaluation, student pharmacists who are suspected to be chemically impaired will be referred to the Director of the Board of Pharmacy's Wellness Program for further evaluation. Student pharmacists who refuse to report voluntarily to the Wellness Program's Director will be referred to the Director by the ADAP. Student pharmacists may be requested by the Board to voluntarily surrender their internship license at this time and the Board may revoke their license if they do not surrender their license.
5. After the student pharmacist is evaluated by the Wellness Program, the Program Director will report his findings to the Board of Pharmacy and the ADAP of the HSOP. This will include a recommendation that includes an appropriate treatment and recovery program as well as a recommendation concerning revocation of internship license. After the Board of Pharmacy's decision, the Wellness Program's Director will notify the HSOP concerning the student pharmacist's internship licensure status.

6. Depending on the circumstances, the HSOP may suspend a student pharmacist from the HSOP during the time when he/she is being evaluated. The ADAP will notify the student pharmacist of the suspension and the reasons why this action is being taken. Student pharmacists will at this time be provided the opportunity to respond to this action by providing the ADAP with additional information pertaining to this matter.
7. If a student pharmacist's internship license is suspended, revoked, or voluntarily surrendered, he/she will be immediately suspended from the HSOP.
8. Student pharmacists may be reinstated into the HSOP after the School is notified by the Board that the student pharmacist's internship license has been reinstated at least on a probational basis. At the time of returning to the HSOP, the student pharmacist will be required to acknowledge in writing their recognition of appropriate professional behavior that includes adherence to all Wellness Program stipulations.
9. The Wellness Program will monitor the student pharmacist's ongoing recovery and the administrator will notify the HSOP's ADAP immediately should a student pharmacist fail to comply with any aspect of his/her recovery and monitoring program. Ongoing monitoring will continue until such time as the student pharmacist graduates or otherwise leaves the HSOP. Should a student pharmacist fall out of compliance, the HSOP will take appropriate action based on discussions between the Wellness Program's Director and the ADAP. Potential actions could include additional suspensions from the HSOP and subsequent expulsion from the School in cases of repeated noncompliance during recovery and monitoring. Revocation of a student pharmacist's internship license by the Board will result in a minimum action of suspension from the HSOP. The Associate Dean will communicate to the student pharmacist all disciplinary actions taken by the HSOP against him/her and provide the student pharmacist the opportunity to respond with pertinent information.
10. Students who are arrested or convicted for violation of federal or state laws related to drug diversion are subject to appropriate legal actions, as well as disciplinary actions specified in the HSOP's Code of Ethical and Professional Conduct.