

415 - Drug Free Workplace and Reasonable Suspicion Administrative Procedures



1. Identifying Reasonable Suspicion

Determinations must be based on "specific and articulable observations".

- a. **Observation Criteria:** Administrators should look for changes in appearance, behavior, speech, or odors.
- b. **Documentation:** Observations must be documented in writing immediately.
- c. **The "Two-Person" Rule:** When practicable, two trained administrators should make the determination. If only one is available, they must consult with the Executive Director or a designated Administrative Team member.
- d. **Exclusions:** Suspicion cannot be based solely on rumors, anonymous tips, or past history.

2. Immediate Safety Response

If reasonable suspicion is established, the following steps must be taken:

- a. **Removal from Duty:** The employee must be immediately removed from student contact.
- b. **Supervision:** Administrative coverage must be arranged to ensure students are not left unsupervised.
- c. **Administrative Leave:** The employee may be placed on **paid administrative leave** while awaiting test results.

3. Testing Protocols

- a. **Authorization:** Only the Executive Director or their designee can authorize a drug/alcohol test. Supervisory staff are prohibited from ordering tests independently.
- b. **Types of Testing:** Employees may be tested for various reasons, including pre-employment, post-accident, or random testing for safety-sensitive roles.
- c. **Collection:** All testing must be performed by law enforcement, certified agents, or laboratories using strict chain-of-custody procedures.
- d. **Refusal:** Refusing to submit to an authorized test is a policy violation and may lead to termination.

4. Searches and Inspections

- a. **Scope:** GWA reserves the right to search school property and employee workspaces (e.g., desks, lockers).
- b. **Requirement:** A search may only be conducted when there is reasonable suspicion of a policy violation.

5. Medication and Tobacco Compliance

- a. **Prescription/OTC Drugs:** Employees must notify administration confidentially if a medication may impair their performance. They should not report to work if they cannot safely perform essential functions.

- b. **Tobacco-Free Policy:** Use of tobacco, nicotine, or electronic cigarettes/vaping is strictly prohibited for everyone (employees, contractors, visitors) on all school property and at all school-sponsored events.

6. Confidentiality and Training

- a. **File Management:** Test results must be kept in a **separate secure file**, not the general personnel file.
- b. **Access:** Access is restricted to the Executive Director and designated personnel on a "need-to-know" basis.
- c. **Mandatory Training:** Any administrator authorized to determine reasonable suspicion must receive training on signs of impairment and documentation standards.

Immediate Action Protocol

1. **Remove from Contact:** The employee must be immediately removed from student supervision.
2. **Arrange Coverage:** Ensure administrative coverage is in place for students.
3. **Authorization:** Contact the Executive Director or designee to authorize drug/alcohol testing.
4. **Transport:** Arrange for safe transport to a certified collection agent or laboratory; do not allow the employee to drive.
5. **Status:** Notify the employee they are being placed on paid administrative leave pending results.
6. **Secure Records:** File this form in a secure location separate from the personnel file.

Administrator 1 Signature: _____ **Date:** _____

Administrator 2 Signature: _____ **Date:** _____