

In compliance with applicable federal and state law, including the Drug-Free Workplace Act, George Washington Academy (“GWA”) will maintain and enforce a drug- and alcohol-free workplace. GWA is committed to providing a safe and productive environment for students, employees, and visitors. Because employees serve in positions of trust and are directly responsible for student supervision and safety, employees must be free from impairment while on duty. Maintaining a drug- and alcohol-free workplace is essential to protecting student safety and preserving the trust placed in school employees.

GWA prohibits the use, possession, manufacture, distribution, dispensing, or sale of illegal drugs, alcohol, or controlled substances on school property, during work hours, or at school-sponsored activities. Employees shall not report to duty while under the influence of alcohol, illegal drugs, misused prescription medication, or over-the-counter medication that may impair the safe and effective performance of job responsibilities.

Lawful off-duty conduct is not prohibited unless such conduct results in on-duty impairment, negatively impacts job performance, or endangers student safety. This policy is intended to promote safety, consistency, and clarity and is not intended to interfere with lawful off-duty conduct except where it impacts job performance or student safety.

## **Reasonable suspicion**

Reasonable suspicion provides the standard by which the school determines whether further action, including removal from student contact or testing, may be necessary to ensure student safety and compliance with this policy.

“Reasonable suspicion” means a belief, based on specific, contemporaneous, and articulable observations of appearance, behavior, speech, or odors, that an employee may be impaired or has violated this policy. Reasonable suspicion shall not be based solely on rumor, anonymous reports, or past conduct and must be supported by documented observations.

When practicable, reasonable suspicion determinations should be made by two trained administrators. If a second trained administrator is not available, one trained administrator may make the determination in consultation with the Executive Director or a designated member of the Administrative Team.

All reasonable suspicion determinations must be promptly reported to the Executive Director or a designated member of the Administrative Team and documented in writing, including the specific observations supporting the determination.

## **Authority to initiate testing and conduct searches**

Drug and/or alcohol testing may be authorized by the Executive Director or another member of the Administrative Team designated by the Executive Director. Supervisory staff may not independently order testing without proper authorization.

## 415 - Drug Free Workplace and Reasonable Suspicion Policy (cont.)

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GWA reserves the right, consistent with applicable law, to conduct reasonable searches of school property and employee workspaces when there is reasonable suspicion of a policy violation.

### **Drug testing**

Employees may be required to submit to drug and/or alcohol testing under circumstances such as pre-employment, pre-rehire, reasonable suspicion, post-accident, critical incident, return-to-duty, or random testing where applicable to designated safety-sensitive positions as defined by administration. All testing shall be conducted by law enforcement, certified collection agents, and/or laboratories in accordance with established chain-of-custody procedures.

### **Immediate safety measures**

If reasonable suspicion exists, the employee shall be immediately removed from student contact pending evaluation or testing. Administrative coverage shall be arranged as necessary to maintain appropriate student supervision. The employee may be placed on paid administrative leave pending test results.

### **Prescription and over-the-counter medication**

Employees shall not report to work if medication renders them unable to safely perform the essential functions of their position. Employees who believe medication may impair performance should notify administration confidentially and request leave or accommodation as appropriate.

### **Confidentiality**

Test results and related documentation shall be maintained in a secure file separate from the employee's personnel file and accessible only to the Executive Director and designated administrative personnel on a strict need-to-know basis. Such information may be disclosed as required by law or for legitimate administrative purposes.

### **Disciplinary action**

Violation of this policy, including refusal to submit to authorized testing, may result in disciplinary action up to and including termination, consistent with applicable employment policies and standards.

### **Training**

Administrators authorized to determine reasonable suspicion shall receive training regarding signs of impairment, documentation standards, and student safety response protocols.

### **Administrative procedures**

The Executive Director shall adopt and maintain administrative procedures necessary to implement this policy, including documentation requirements, timelines, testing protocols, and related safeguards.

### **Tobacco-free campus**

In accordance with Utah law, the use of tobacco, nicotine products, and electronic cigarettes (including vaping devices) is prohibited on all school property, including indoor and outdoor areas, and at all school-sponsored activities.

This prohibition applies to all students, employees, contractors, and visitors. Violations may result in disciplinary action consistent with applicable policies and procedures.