Cleveland Clinic
School of Health Professions

Annual Policy Notification in accordance with Federal Drug-Free Schools and Communities Act Regulations

In compliance with the federal Drug-Free Schools and Communities Act Regulations [EDGAR Part 86], Cleveland Clinic School of Health Professions distributes this Annual Notification of the school's alcohol and drug prevention programs, to all students, Program Directors, faculty, and administration, on a yearly basis. All students will receive the Annual Notification directly to their personal email address used during the SilkRoad onboarding process. All caregivers will receive this notification through their Cleveland Clinic email. Questions regarding the Drug Free Schools and Communities Act or alcohol and other drug programs, interventions and policies may be directed to the Assistant Dean of Student Affairs at SOHP@ccf.org.

Applicable Legal Sanctions

Students and employees are subject to all applicable federal, state, and local laws regarding the unlawful possession, use, manufacture, distribution, or sale of alcohol and controlled substances. Violations may result in criminal penalties including fines, imprisonment, probation, mandatory substance abuse education or treatment programs, driver's license suspension, and other sanctions.

Under Ohio law, it is unlawful for persons under age 21 to purchase, possess, or consume alcohol except as otherwise permitted by law. Ohio law also prohibits operating a vehicle while under the influence of alcohol or drugs and prohibits the unlawful possession, use, sale, manufacture, or trafficking of controlled substances.

Federal law, including the Controlled Substances Act, prohibits the unlawful possession, manufacture, and distribution of controlled substances. Depending on the nature of the offense, penalties may include substantial fines and imprisonment.

Additional information regarding Ohio criminal statutes is available in Chapters 4301 and 2925 of the Ohio Revised Code. Information regarding federal drug laws is available through the U.S. Drug Enforcement Administration.

Health Risks

The use of alcohol and other drugs can affect the health, safety, and well-being of students, faculty, staff, volunteers, and campus visitors, as well as the overall security of the campus community. Cleveland Clinic School of Health Professions is committed to fostering a safe, healthy, and supportive learning environment for all.

Healthcare professionals play a vital role in delivering safe, high-quality patient care. The misuse of alcohol or other drugs can impair judgment, concentration, and decision-

making, affecting a person's ability to perform responsibilities safely and effectively. This can place both patients and healthcare team members at risk.

Beyond patient care concerns, substance misuse may contribute to:

- Physical and mental health challenges
- Legal and professional consequences
- Disciplinary action, including suspension or loss of licensure
- Financial hardship due to job loss or reduced work opportunities
- Barriers to career advancement and professional development
- Strained workplace and personal relationships

One of the most serious and potentially life-threatening consequences of substance use disorder (SUD) is an overdose, which occurs when a person consumes more of a substance than their body can safely process. Overdose is a medical emergency and can affect different body systems depending on the substance involved.

Substance use disorders can also lead to a wide range of long-term health, academic, professional, and social challenges, including:

- Cancer and other chronic health conditions
- Depression and other mental health concerns
- Infectious diseases, including hepatitis B, hepatitis C, and HIV
- Memory and cognitive difficulties
- Academic or career-related challenges
- Difficulties maintaining healthy relationships
- Engagement in unsafe, illegal, or high-risk behaviors

Cleveland Clinic School of Health Professions encourages students to seek support early and utilize available resources to protect their health, well-being, and future professional success.

Other Health Risk Resources:

- Substance Use Disorder (Cleveland Clinic)
- Drug Health Risks and Substance Use Disorders (National Institute on Drug Abuse)
- Alcohol’s Effects on the Body (National Institute on Alcohol Abuse and Alcoholism)
- Alcohol Use and Your Health (CDC)

Substance Abuse Resources:

SOHP students and caregivers may access the Substance Abuse Awareness Center of the Caring for Caregivers Office, which offers education, counseling and other resources to address substance abuse.

Student Substance Abuse Policy

Purpose

The purpose of this policy is to define prohibited behavior with regard to the possession, diversion and/or use of alcohol and/or drugs by students and to provide information on how to address instances of suspected possession, diversion and/or use of alcohol and/or drugs by students.

Policy Statement

Cleveland Clinic is committed to maintaining a safe, healthful and efficient working and learning environment for its students, trainees, employees, patients and visitors. Consistent with this commitment, Cleveland Clinic prohibits the misuse of alcohol and drugs, as discussed in this policy.

Definitions

Cleveland Clinic United States locations: Includes the main campus, Avon, Euclid, Fairview, Hillcrest, Lutheran, Marymount, Medina, Mercy, South Pointe, Children's Hospital for Rehabilitation, Weston Hospital, Coral Springs Ambulatory Surgery Center, Martin North Hospital, Martin South Hospital, Tradition Hospital, Coastal Care Corporation and all Family Health Centers, Physician practice sites, Nevada practice sites, Emergency Departments, Express Care Centers, Urgent Care Centers and Ambulatory Surgical Centers reporting to these facilities.

Cleveland Clinic Premises: All Cleveland Clinic buildings, other buildings where Cleveland Clinic employees work, parking garages, parking lots or other open areas owned or under control of Cleveland Clinic, in any Cleveland Clinic vehicle, or at any other location while on Cleveland Clinic business.

Affiliate School: An educational institution with which Cleveland Clinic has an affiliation agreement through which enrolled students of the institution participate in Cleveland Clinic's educational programs or activities. Student Substance Abuse Policy Page 2 of 6 Affiliate Student: An affiliate student is a participant in a Cleveland Clinic educational program or activity who is enrolled in an affiliate school.

Diversion: The unauthorized removal of a controlled substance from a patient and/or patient care setting.

Educational Program or Activity: Any program or activity offered at Cleveland Clinic or by Cleveland Clinic employees in the scope of their duties that is educational in nature beyond on the-job training, general interest, or routine continuing education

programs. Factors in determining whether a program or activity is educational include whether it is structured through a particular course of study; whether participants earn academic credit toward a degree or certificate, or qualify to sit for professional exams; or whether a program provides instructors, exams or other evaluation process. Educational programs and activities include, without limitation, degree- or certificate-granting programs offered by Cleveland Clinic and affiliated colleges and universities; clinical rotations for degree- or certificate-granting programs; medical and other residency programs; research and medical fellowships; internships; and educational programs offered to middle school, high school, college and university students.

Illegal Drugs and Controlled Substance: Any substance which in any manner alters normal perception, thought functions, behavior or mood, including, but not limited to marijuana (regardless of whether it is prescribed medical marijuana), cocaine, narcotics, tranquilizers, amphetamines and barbiturates. This definition includes marijuana regardless of whether it is being used for recreational purposes, prescribed medical marijuana, or in a product like CBD oil derived from cannabis.

Impairment: The effect of the use of alcohol or any psychoactive or mood-altering substance on mental, emotional and/or physical functioning, even if caused by the use of a controlled substance supported by a valid prescription. Symptoms may include, but are not limited to, drowsiness and/or sleepiness, odor of alcohol on breath, odor of marijuana, slurred/incoherent speech, unusually aggressive or bizarre behavior, unexplained change in mood, lack of manual dexterity, lack of coordination in walking, unexplained program related accident or injury. Prohibited impairment also includes any detectable amount of an illegal drug, controlled substance (that is not supported by a valid prescription) and/or alcohol in a student's system, even if the student is otherwise asymptomatic. Improper Self-Medication: Includes, but not limited to, using drugs prescribed to someone else, using drugs at other than the prescribed dose, using drugs with an outdated prescription, or using over-the-counter medication in a manner not in accord with the manufacturer's instructions.

Program Leadership: For the purposes of this policy, refers to the administrators of a student's educational experience or program. Program leadership includes program directors, education coordinators, preceptors and other Cleveland Clinic employees with the authority to address misconduct in a program/educational experience.

Student: For the purposes of this policy, a student is a person enrolled in a Cleveland Clinic educational program or activity who is not employed by Cleveland Clinic. The term "student" includes affiliate students and trainees who are not employed by Cleveland Clinic.

Trainee: For the purposes of this policy, an individual who participates in an educational program or activity as a resident, fellow or scholar. Examples of job titles that denote trainees include resident, clinical fellow, clinical research fellow, research fellow, postdoctoral fellow, postdoctoral research fellow, postdoctoral psychology fellow, special fellow, clinical scholar, research scholar, and clinical institute research scholar.

Policy Implementation

Scope

This policy applies to students, as that term is defined herein. Individuals who are employed by Cleveland Clinic are subject to the Substance Abuse Policy even if they are also enrolled in a Cleveland Clinic educational program or activity. If program leadership learns of the impairment of a student who is also an employee, they shall consult with Human Resources to implement the Substance Abuse Policy.

Prohibited Conduct

Cleveland Clinic prohibits:

A. The unlawful or unauthorized use, manufacture, possession, sale, or transfer of illegal or prohibited drugs and/or controlled substances on Cleveland Clinic premises.
B. Reporting to any learning or clinical environment impaired or under the influence of any illegal drug, controlled substance, prohibited substance (e.g., marijuana) and/or alcohol.
C. Consumption of alcohol on Cleveland Clinic premises and/or while engaged in Cleveland Clinic educational program or activity even off-site (except at functions approved or sponsored by Cleveland Clinic).
D. Improper self-medication of over-the-counter or prescribed drugs on Cleveland Clinic premises.

For the avoidance of doubt, nothing in this policy prohibits an employee from possessing and/or using a controlled substance (except marijuana) if the employee has a valid prescription for the controlled substance and uses it in the prescribed dose and manner, unless doing so renders the employee unable to perform their job safely and effectively.

Voluntarily Seeking Assistance

Cleveland Clinic recognizes that substance abuse/dependency is a progressive, chronic disease that has adverse effects on both the student's quality of life and job performance. However, substance abuse/dependency is treatable and early recognition and treatment is advisable. Students who suspect they may have a problem with substances are encouraged to voluntarily seek assistance. Cleveland Clinic will provide reasonable academic accommodations for students who are diagnosed with substance abuse/dependency.

Programs of Education, Prevention, Treatment and Support

Cleveland Clinic provides programs of education, prevention, treatment and support to encourage a drug-free learning environment/lifestyle.

Reasonable Suspicion of Impairment, Possession or Diversion

All students may be subject to urine and/or breath testing when reasonable suspicion exists that the student is in an impaired condition and/or under the influence of drugs and/or alcohol on Cleveland Clinic premises. For the purpose of this policy, a reasonable suspicion of impairment exists: (1) when the student exhibits aberrant behavior and/or the type of behavior that shows symptoms of intoxication or impairment caused by drugs and/or alcohol; and (2) the behavior cannot reasonably be explained by other causes.

If an employee develops a reasonable suspicion that a student is impaired while on Cleveland Clinic premises, the employee will report their suspicion to the student's program leadership. The student's program leadership will notify the student of the need for immediate evaluation and testing. A reasonable suspicion referral for evaluation/testing will be made on the basis of documented objective facts and circumstances that are consistent with the effects of substance abuse or alcohol misuse. Program leadership will contact Occupational Health or a designated testing location for evaluation and/or testing and shall accompany the student to the location of their evaluation and testing. The Testing and Intervention Procedures for Suspected Substance Abuse, Diversion, or Other Concerns for Impairment includes information on regional testing locations.

All students may be subject to an appropriate search on Cleveland Clinic premises when reasonable suspicion exists that a student is in improper possession of alcohol, illegal drugs and/or a controlled substance or may have diverted a controlled substance. If an employee develops a reasonable suspicion that a student is in improper possession of alcohol, illegal drugs and/or a controlled substance or may have diverted a controlled substance, the employee will report their suspicion to the student's program leadership. The program leadership shall contact Cleveland Clinic Protective Services to perform appropriate searches and investigation.

Refusal to Comply

Any student refusing to comply with a lawful evaluation, test or search, or otherwise failing to cooperate with an investigation conducted in accordance with this policy will be subject to removal from Cleveland Clinic premises and subject to disciplinary action up to and including dismissal from their program/educational experience.

Safe Transportation

Program leadership will arrange for transportation for the student to their home when the program leadership has reasonable suspicion that the student is impaired, unless the student is admitted as a patient. The Cleveland Clinic Police Department/Hospital Security can be contacted to obtain cab vouchers and also for consultation. If the student refuses transportation assistance, program leadership must document the fact and notify the Cleveland Clinic Police Department. Because of the safety implications of reasonable suspicion of impairment, refusal to accept safe transportation arrangements may result in discipline up to and including dismissal from the program.

Violation of Policy

Any student who is found to be in violation of this policy is subject to disciplinary action up to and including dismissal from their program/educational experience. A student may be suspended from participation in their program/educational experience pending the outcome of an investigation. An affiliate student's program leadership will inform an affiliate school of any actions taken under this policy.

Confidentiality

Student information related to this policy (e.g., reasonable suspicion of impairment, medical evaluation results, etc.) shall be held as confidential as reasonably possible consistent with program leadership's responsibilities under the policy and any reporting obligations required by law.

Caregiver Substance Abuse Policy

Purpose

This policy defines prohibited behavior with regard to use of drugs and alcohol in the workplace and provides information on managing substance abuse issues.

Policy Statement

Cleveland Clinic is committed to maintaining a safe, healthful and efficient working environment for its patients, employees and visitors. Consistent with this commitment, Cleveland Clinic prohibits the misuse of drugs and alcohol in the workplace, as discussed in this policy.

Definitions

Cleveland Clinic United States locations: Includes the main campus, Avon, Euclid, Fairview, Hillcrest, Lutheran, Marymount, Medina, Mercy, South Pointe, Children's Hospital for Rehabilitation, Weston Hospital, Coral Springs Ambulatory Surgery Center, Martin North Hospital, Martin South Hospital, Tradition Hospital, Coastal Care Corporation and all Family Health Centers, Physician practice sites, Nevada practice sites, Emergency Departments, Express Care Centers, Urgent Care Centers and Ambulatory Surgical Centers reporting to these facilities.

Cleveland Clinic Premises: Includes all Cleveland Clinic buildings; other buildings where Cleveland Clinic employees work; parking garages, parking lots, or other open areas owned or under the control of Cleveland Clinic; any Cleveland Clinic vehicle; or any other location while on Cleveland Clinic business.

Diversion: The unauthorized removal of any substance from the organization, including but not limited to a patient and/or patient care setting.

Illegal Drugs and Controlled Substances: Includes substances which alter normal perception, thought functions, behavior, or mood, including but not limited to opioids, cocaine, narcotics, tranquilizers, amphetamines and barbiturates.

Prohibited Substance: Generally refers to marijuana whether used for recreational purposes, for medical purposes pursuant to a prescription, or in a product derived from cannabis such as CBD oil.

Impairment/Impaired: The effect of the use of alcohol or any psychoactive or mood altering substance on mental, emotional and/or physical functioning, even if caused by the use of a Controlled Substance supported by a valid prescription. Symptoms may include, but are not limited to, drowsiness and/or lethargy, odor of alcohol on breath, odor of marijuana, slurred/incoherent speech, unusually aggressive or bizarre behavior, unexplained change in mood, lack of manual dexterity, lack of coordination in walking, and/or unexplained work-related accident or injury. Prohibited Impairment includes any detectable amount of an Illegal Drug, Controlled Substance (that is not supported by a valid prescription), Prohibited Substance, and/or alcohol in an employee's system, which may be asymptomatic yet result in a positive test.

Improper Self-Medication: Includes, but is not limited to, using drugs prescribed to someone else (including a family member), using drugs other than as prescribed, using an expired prescription, or using over-the-counter medication in a manner inconsistent with the manufacturer's instructions.

Policy Implementation

Prohibited Conduct

Cleveland Clinic prohibits:

A. The unlawful or unauthorized use, manufacture, possession, sale, or transfer of Illegal Drugs, Controlled Substances and/or Prohibited Substance, on or off Cleveland Clinic Premises.
B. Reporting to work or working while Impaired or under the influence of any Illegal Drug, Controlled Substance, Prohibited Substance (e.g., marijuana) and/or alcohol, even if working remotely.
C. Consumption of alcohol on Cleveland Clinic Premises and/or while working or conducting Cleveland Clinic business even if working remotely (except at functions approved or sponsored by Cleveland Clinic where alcohol is permitted).
D. Improper Self-Medication as defined by this policy.

For the avoidance of doubt, nothing in this policy prohibits an employee from possessing and/or using a Controlled Substance (except marijuana) if the employee has a valid prescription for the Controlled Substance and uses it in the prescribed dose and manner, unless doing so renders the employee unable to perform their job safely and effectively.

As part of the testing process, Cleveland Clinic Occupational Health and/or Caring for Caregivers might be notified by the external Medical Review Officer of a negative result that carries a potential safety concern because of the employee's use of a validly prescribed Controlled Substance. In that situation, the employee is required to fully cooperate with a request for the identity of the prescribing provider and/or any other information it deems necessary to address the concern.

Voluntarily Seeking Assistance

Cleveland Clinic recognizes that substance abuse/dependency is a progressive, chronic disease that has adverse effects on an employee's quality of life and job performance. However, substance abuse/dependency is treatable, and early recognition and treatment is advisable. Employees who suspect they may have a problem with substances are encouraged to voluntarily seek assistance.

It is an employee's responsibility to voluntarily seek assistance before the employee is asked to submit to any drug or alcohol test or is discovered to have otherwise violated this policy. Cleveland Clinic maintains Caring for Caregivers (Employee Assistance Program (EAP), Licensed Professionals Health Program (LPHP), and Physician Health Committee (PHC)) in order to provide confidential assistance in receiving appropriate treatment. An employee's decision to seek/receive treatment through any Cleveland Clinic service or other provider will not be used as a basis for corrective action. However, such treatment will not be viewed as a substitute or a defense for appropriate corrective action, if corrective action is otherwise applicable.

Programs of Education, Prevention, Treatment and Support

Cleveland Clinic provides programs of education, prevention, treatment and support to encourage a drug-free workplace/lifestyle, including the Caring for Caregivers' Substance Abuse Center.

Post-Offer Pre-Placement Substance Testing

Post-offer pre-placement testing is required of all prospective newly hired, rehired or reinstated individuals as part of a routine protocol. Positive results will preclude an applicant from being hired.

Post-Accident/Return-to-Duty Testing

Upon the manager's consultation with Human Resources/Office of Professional Staff Affairs/Graduate Medical Education and Caring for Caregivers (EAP, LPHP, or PHC, as applicable), any employee may be subject to post-accident/return-to-duty drug and/or alcohol testing following any accident or other safety event during the employee's scheduled shift that the employee caused or contributed to and that results in personal injury, property damage, or other harm to the employee and/or anyone else. An employee who is required to undergo postaccident/return-to-duty testing will not be permitted to resume working while the test results are pending.

Vaporizers ("Vapes")

The use of vaporizers (aka "vapes") is prohibited under the Non-Smoking Policy. Any employee who is observed using a vaporizer/vape during their scheduled shift may be subject to mandatory drug testing.

Random Testing

Employees are subject to random, unannounced drug testing throughout the year. When notified that they have been selected for random screening, employees must report to the designated testing site within the timeframe designated by Occupational Health, regardless of their work location (e.g., onsite, hybrid, or remote), unless on preapproved Paid Time Off or an approved leave of absence. The detection of a Controlled Substance (except marijuana) for which an employee has a valid prescription consistent with the test result will not, standing alone, result in a positive drug test. Additionally, random alcohol testing will be conducted where required by Department of Transportation regulations.

Reasonable Suspicion of Impairment/For-Cause Referral

Reasonable Suspicion Testing

Any employee may be subject to "for Cause" urine and/or breath testing when reasonable suspicion exists that the employee appears to be working in an Impaired condition and/or under the influence of drugs and/or alcohol. A reasonable suspicion referral for testing will be made based on documented objective facts and circumstances that are consistent with the effects of substance abuse or alcohol misuse. For the purpose of this policy, the term "reasonable suspicion" shall be defined as aberrant or unusual behavior of an individual employee:

a) who is observed on duty, or reporting to duty, by either the employee's immediate supervisor, any higher ranking employee, or other managerial personnel, who are

required to document their observations as soon as practicable under the circumstances; and

b) who exhibits the type of behavior that shows symptoms of intoxication or Impairment caused by drugs and/or alcohol; and
c) whose conduct cannot reasonably be explained by other causes.

If, after observing the employee, the supervisor, higher ranking employee, or manager continues to have reasonable suspicion that the employee is using, consuming, and/or under the influence of alcohol and/or drugs while on duty, the employee will be notified of the need for immediate testing and evaluation.

Reasonable Suspicion of Diversion/Possession

If a supervisor and/or Diversion Response Team suspects Diversion of any substance, the supervisor shall take all the following steps:

A. Contact Human Resources/Office of Professional Staff Affairs/Graduate Medical Education, Caring for Caregivers (EAP, LPHP, or PHC, as applicable) and/or the Nursing Institute for guidance.
B. Contact the Pharmacy Department for assistance in compiling investigatory reports.
C. Conduct a thorough investigation, checking doctor's orders, documentation of medications dispensed, and other appropriate records/resources.
D. Consult with Caring for Caregivers (EAP, the LPHP, or PHC, as applicable) to review evidence and to coordinate intervention if indicated.

If a supervisor has reasonable suspicion that an employee is in improper possession of alcohol, Illegal Drugs, Controlled Substance, and/or Prohibited Substance, the supervisor may request that Cleveland Clinic Police Department and/or security perform appropriate searches of the employee and Cleveland Clinic Premises.

Reporting Drug or Alcohol Related Convictions

Employees are required to report to their supervisor any criminal convictions of drug or alcohol related violations arising from the employees' conduct while on Cleveland Clinic Premises and/or conducting Cleveland Clinic business.

In addition, any felony charges or convictions must be reported pursuant to the Criminal Records Background Check Policy.

Refusal to Comply

Any employee refusing to comply with a lawful search or alcohol or drug test, or otherwise failing to cooperate with an investigation conducted in accordance with this

policy, will be subject to removal from Cleveland Clinic Premises and subject to corrective action up to and including termination (see Corrective Action Policy).

Safe Transportation

A supervisor will arrange for safe transportation for the employee to their home whenever reasonable suspicion testing has been initiated. Options may include transportation through a designated family member or friend, UberHealth through Occupational Health, or other means such as a cab voucher where applicable. Refusal of safe transportation options may result in corrective action up to and including termination (See Corrective Action Policy). The supervisor should document noncompliance and immediately notify the Cleveland Clinic Police Department and/or security.

Violation of Policy

Any employee who is found to be in violation of this policy:

A. Is subject to corrective action up to and including termination (see Corrective Action policy).
B. May be afforded the opportunity to participate in the Caring for Caregivers Programs (EAP, the LPHP, or PHC, as applicable). These programs and services provide assessment and treatment planning, referral and follow-up services (see Employee Assistance Program policy). Licensed health professionals may be referred to the LPHP or the PHC for on-going monitoring of the re-entry to work and review, recommendation and oversight of any restrictions on their license (see Licensed Health Professionals Impairment policy).

Treatment expenses not covered by an employee's health plan, including substance screens, are the employee's responsibility. Non-compliance with treatment requirements may result in corrective action up to and including termination.

Confidentiality

Employee information related to this policy (e.g., reasonable suspicion of Impairment, medical evaluation results, etc.) shall be held in strict confidence as outlined in the Employee Assistance Program policy and the Licensed Health Professionals Impairment policy. All Staff and Employee Assistance Programs operate under confidentiality rules and release only limited information to supervisors.

State Licensing Boards/Confidential Monitoring Bodies

Cleveland Clinic maintains a cooperative working relationship with all applicable state licensing/certification boards. The appropriate state licensing/certification boards, peer

assistance programs, or confidential monitoring bodies will be notified in the event of any positive drug or alcohol test, regardless of the reason for the test and regardless of whether the employee was asymptomatic when tested.