

PRESCRIPTION DRUG DISCLOSURE CHECKLIST

- Drug testing policy includes legally vetted language about safety sensitive work and pre-duty disclosure of impairing effect medication.
- The pre-duty disclosure policy is only applicable to safety sensitive employees.
- Job descriptions include as an essential function "the ability to work in a constant state of alertness and safe manner."
- Evaluate and define in a written report which positions are safety sensitive using a legally vetted definition.
- Employees are instructed to report impairing medication use to a trained administrator and not to a frontline supervisor.
- Job fitness of reporting employee is first determined by the treating physician.
- Reporting employee is provided written directions, current job description and a clearance form for the treating physician to make a confidential assessment.
- Retain MRO/Occupational Physician to guide company disclosure and evaluation process and communicate with the treating physician.
- Conduct two hours of ADA supervisory disability discrimination training to clarify what constitutes an ADA disability related inquiry, an ADA medical examination, and the proper steps to make a prescription medication inquiry.
- Employees report only the the use of impairing medication and not what it is called or why it's being used.
- Employment is not conditional on discontinuation of legally prescribed medication unless a physician determines it's necessity.
- ADA's reasonable accommodation dialogue is used even with a physician's recommendation in hand.
- Drug screen results, the use of medication, or existence of a disability is not discussed in the presence of peers.
- Know your state's approved panel before ordering an expanded panel test.
- Have questions? Call Wolfe, Inc at 800.230.2991

