



**INSTITUTIONAL GRADUATE MEDICAL EDUCATION POLICY**

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**SUBJECT:** Trainee Impairment Policy

**DATE EFFECTIVE:** April 20, 2005

**POLICY:** Impairment

**PAGE:** 1 of 3

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**I. PURPOSE:**

This policy is intended to provide a process for programs to follow when it is necessary to investigate and determine if a trainee suffers from an impairment as well as a course of action if it is determined that a trainee may have an impairment. This policy is not intended to replace or alter the standards and requirements set forth in other Children's National Hospital (CH) policies concerning drugs and alcohol, misconduct, or professionalism.

**II. POLICY SCOPE:**

All Accreditation Council for Graduate Medical Education (ACGME) accredited or non-ACGME residency and fellowship programs sponsored by CH.

**III. DEFINITIONS:**

*Trainee*

Trainee refers to all interns, residents and fellows participating in ACGME accredited, or non-ACGME training programs sponsored by CH.

*Training Program*

Training program or program refers to an ACGME accredited or non-ACGME internship, residency or fellowship training program sponsored by CH.

**IV. POLICY:**

Throughout their educational experiences at CH, trainees must be held to the ethical and professional standards of their chosen profession. It is the policy of CH to provide a drug-free workplace and assure a safe work environment for all employees, patients, and visitors.

Therefore, no employee shall be under the influence of an illegal drug in the workplace. In addition, no employee shall be under the influence of a legally obtained drug while on duty if it could impair

the ability of the employee to function safely in their job, or jeopardize the safety of co-workers, patients, or visitors. For the purpose of this policy, alcohol is considered such a drug.

All selected applicants undergo a screening process for alcohol or substance abuse. In addition, in accordance with CH policy, drug screening may be required if reasonable suspicion exists that an employee is under the influence of a drug during work hours.

## **V. PROCEDURE:**

### **A. *New Employee Testing Procedures***

All offers of employment are subject to the successful completion of a new employee health examination, which will include a drug and/or alcohol screen. If an applicant refuses to be tested or submits a false sample, the offer will be rescinded. Offers made to individuals who test positive for either drugs or alcohol will be rescinded, and those individuals will generally be ineligible for employment for a period of at least six months.

### **B. *Trainee Use of Alcohol or Illegal Drugs***

Only Leadership Council may authorize the moderate consumption of alcohol during CH-sponsored events during or after regular work hours. Trainees are not permitted to possess, consume or be under the influence of alcohol while on CH or satellite premises or while conducting CH business. In addition, Trainees may not be under the influence of alcohol when in “on-call” status.

If there is a reasonable suspicion that a Trainee is under the influence of illegal drugs or alcohol, the clinical supervisor is to immediately discuss the suspicion with the Trainee. If the suspicion still exists, the supervisor should immediately consult with the appropriate Program Director, DIO, and Human Resources to determine further action.

### **C. *Responsibilities***

The Program Director of the impaired Trainee will investigate, and document reported observations regarding the potentially impaired Trainee in the manner set forth in this policy; contact the DIO; contact CH Human Resources; refer the impaired Trainee to Occupational Health Services; and take other appropriate actions in the manner authorized by this or other CH policies. Trainees will ensure they are able to participate in all CH activities in a fit and safe manner and are expected to manage their health and behavior so that they can engage in CH-related activities in a safe, productive, and effective manner. Impaired trainees will satisfy all requirements set forth in this policy and all directives from the trainee’s Program Director, DIO, Occupational Health, and Human Resources.

If a decision is made that drug testing is the appropriate action after consultation with all parties listed in this policy, the Trainee will be informed that CH wishes to test for drug and/or alcohol

use. The Trainee will be informed that refusal to consent to screening will result in termination of employment.

Occupational Health Services will oversee the testing and the chain of custody of the specimen. Trainees who submit a false sample or test positive are subject to corrective action, up to and including termination. At the Trainee's request, a positive drug test may be validated at a second NIDA-certified testing laboratory using the same sample, provided the Trainee so requests within three (3) working days of notification of the test results.

**VI. PROCEDURE:**

Approved by:



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DIO/Vice Chair, Medical Education

5/8/2024

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Date

**VII. REVIEW OR REVISION DATE**

Approved by the GMEC: April 20, 2005

Modified and Approved by GMEC: September 19, 2007

Modified and Approved by GMEC: January 20, 2017

Modified and Approved by GMEC: March 19, 2019

Modified and Approved by GMEC: September 9, 2020

Reviewed and Approved by GMEC: October 13, 2021

Reviewed and Approved by the GMEC: June 15, 2022

Modified and Approved by GMEC: September 13, 2023

Reviewed and Approved by the GMEC: May 8, 2024