

# Drug-Free Safety Program Guide

Basic Information about BWC's Drug-Free Safety Program





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# Guide to a Drug-Free Safety Program

BWC is offering a new, more effective program that offers employers a holistic approach to workplace safety. The new Drug-Free Safety Program (DFSP) is an innovative program that integrates a drug-free element and is designed to help employers establish safer and more cost-effective workplaces.

The DFSP begins by focusing on safety processes intended to help employers better manage their risk, and prevent workplace accidents and injuries. We encourage you to consider the DFSP as an option to keep your employees safe, and to reduce the chance of an accident resulting from substance use and abuse.

Our DFSP has the flexibility of two levels – Basic and Advanced. You will choose the level that best meets the needs of your business.

## Program requirements

### Safety processes

The DFSP begins with safety. It integrates drug-free efforts into a company’s overall safety process rather than grafting safety into drug-free efforts. The DFSP incorporates efforts to deter, detect and take corrective action to address alcohol and other drug use that impact workplace safety. You should include your DFSP plan in your overall company safety policy.

### Minimum safety-specific requirements for the Basic and Advanced levels

- Complete an **annual online safety review** within 30 days of the start of the program participation year. The safety review is a self-administered questionnaire that examines key aspects of your safety processes to assess strengths/weaknesses within your safety culture and identify processes that you would like to improve.

- Conduct **accident-analysis training** for supervisors and any other personnel involved in the accident-analysis process within the first 30 days of the program participation year or within 60 days of assigning an employee supervisory duties. Accident analysis gathers/analyzes information to determine root causes of workplace accidents and helps identify corrective actions to prevent future incidents. Training options are available online at [ohiobwc.com](http://ohiobwc.com).
- Complete and submit to BWC an online **accident report** within 30 days of the date of injury, or after becoming aware that an employee has filed a claim. Employers will use the skills developed during BWC’s accident-analysis training to complete a report for each claim.

## How to use this guide

This guide explains the rules, program requirements and policies in establishing a DFSP. It also offers you the information you need to address substance use within your company.

Read on to learn more about the program’s elements and requirements.

### Advanced level only

- Submit a **Safety Action Plan** within 60 days of the start of the policy participation year (30 days after the safety review deadline) to address identified safety gaps by listing planned safety-process improvements.

### How do employers request assistance in approaching safety?

BWC has safety consultants in each of our statewide customer service offices. These professionals are available to talk with you by telephone or meet you in person. They’re available to help employers devise a comprehensive approach to risk management, identify safety challenges and specific, no-cost safety services.

They can also help you with accident reporting, accident-analysis training and a wide range of technical assistance. In addition, BWC’s employer services specialists are available to assist you with claims analysis, claims costs or comparing BWC’s rating programs.

A BWC safety consultant will contact advanced-level employers to help develop the Safety Action Plan.



### Written DFSP policy

Every DFSP starts with the development of a written substance policy that sets the program's tone for your operation. Obtain input from employees at every level of your operation to garner support for your DFSP. Make sure your policy outlines the responsibilities of management and employees in support of the program, and includes a full explanation of your DFSP. Let everyone know that you want to create a safer workplace by addressing alcohol and other drug use in the context of your company's overall safety efforts.

A written DFSP policy should serve as a full and fair disclosure of all work rules related to the program. It gives the work force a clear understanding of what you expect from them in terms of work behaviors, what actions you prohibit and which will violate policy.

To be compliant, your written DFSP policy should cover every element of the DFSP level (Basic or Advanced) you are implementing. You should base your DFSP policy, at least in part, on management's concerns for employee safety and health, productivity, accident prevention and loss control.



BWC offers the following recommendations to assist you in developing your written DFSP policy:

- Educate your employees by sharing the policy before program implementation;
- Detail all rules of the level in which you are implementing to help employees understand how the program works;
- Clearly state the program applies to all employees, including top management;
- Identify the person whom employees should contact with questions;
- Indicate the specific drugs that testing will include and make sure to address the use/misuse of alcohol, prescription medications, over-the-counter medications and illegal drugs;
- Reference collective-bargaining agreements, if applicable, and show how the program works with these agreements to promote a safer workplace;
- Identify prohibited conduct and consequences for violating the policy, including an employee's refusal to submit to a drug/alcohol test, and an employee's attempt to manipulate the drug/alcohol testing process through adulteration, attempted adulteration, dilution or substitution;
- Identify the cut-off levels for a positive test for alcohol, and note that each tested drug has a cut-off level;
- Provide information on how testing occurs;
- Describe how referrals for testing, a substance assessment (if used) and employee assistance will occur;
- State that supervisor training will occur before supervisors are given responsibilities associated with testing;
- Include a commitment to employee safety and health;
- Address confidentiality of program records to ensure privacy rights of employees;
- Comply with all federal and state laws or regulations in implementing and operating your DFSP.

### Employee education

You must educate your employees by providing information about the DFSP and how it will operate. To prevent problems attributable to substance use and to deter substance use in violation of your policy, we



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encourage you to have a qualified professional present your substance-education sessions.

### To receive a discount for DFSP Basic or Advanced levels, you must meet the employee-education requirements below.

- Provide at least one hour of alcohol and other drug education for all employees, including supervisors each program year.
- Discuss your written DFSP policy with all employees prior to starting the program. Obtain a signed acknowledgment of receipt of the policy, and provide the opportunity for all employees to ask questions.
- Educate new employees about the content of your DFSP within their first eight weeks of employment, ensuring they receive a copy of your DFSP policy and have the opportunity to ask questions.
- Stress management's commitment to the program.
- Note that the following content is incorporated into the employee-education sessions:
  - The disease model for alcohol and other drugs;
  - Impact of recreational alcohol and drug use on workplace safety;
  - Signs and symptoms of substance use/misuse;
  - Effects of commonly used drugs in the workplace;
  - Information about community resources where employees can go for help for themselves or their family members.

### Who presents the information about alcohol and other drugs?

- A qualified educator must be involved in designing or presenting substance education. The qualified professional will hold one of the following substance credentials or a credential determined to be similar and acceptable by BWC:
- Substance abuse professional (SAP);
- Certified employee assistance professional (CEAP);
- Licensed chemical dependency counselor (LCDC, LCDC II);
- Licensed Independent chemical dependency counselor (LICDC);

- Ohio certified prevention specialist (OCPS I and II);
- Certified medical review officer (MRO);
- Licensed professional counselor (e.g., psychologist, social worker);
- Licensed practical nurse (LPN), Bachelor of Science in nursing (BSN) and Master of Science in nursing (MSN) with a specialization in substance abuse;
- Substance Abuse Professional Administrator Association (SAPAA) certified;
- A person with equivalent experience in the substance field within the past five years as evaluated by BWC;
- DARE officer with at least three years of experience in the past five years;
- Any other comparable credential within the substance field that is determined equivalent by BWC.

### What other options do employers have?

Other than having a qualified substance professional come to their place of business and deliver a live presentation, employers may choose a number of options to meet employee-education requirements.

Other options include, but are not limited to:

- Having a qualified substance professional design the presentation materials that comply with the required content, then having a manager who is a skilled presenter deliver the information, with a qualified substance professional responding to questions the manager cannot answer within two business days;
- Using Webinars (a qualified substance professional delivers a presentation that is broadcast live to other locations, with the qualified professional answering employee/supervisor questions);
- Having a manager who is a skilled presenter attend a Train-the-Trainer class of at least three hours, where required content is offered by a qualified substance professional. Once complete, the manager presents the material to the rest of the employer's work force (limitation – the manager who attends a Train-the-Trainer class may not develop new materials in subsequent years and may not train other companies);
- Having online education on required topics with a required quiz;
- Using audio in motor vehicles for employees who are never or seldom at the main company place of business;
- Other approaches that meet the same considerations as the options above.



### Supervisor training

To ensure proper training in supervisor DFSP responsibilities, a qualified substance professional who is an experienced trainer must develop a training program to build the skills your supervisors will need to properly support the DFSP. For the Advanced level, supervisors must also receive training about random drug-testing procedures and the differences in assistance referrals for assessment compared with the Basic level.

#### To receive a discount, you must meet the following supervisor-training requirements:

- In your first year in DFSP, include at least two hours of initial informational and skill-building sessions for all supervisors in addition to the hour of employee education and the accident-analysis training;
- After the first year in the DFSP, supervisors who received the initial training must receive, at minimum, a one-hour refresher course in addition to the hour of employee education.
- Within eight weeks of becoming a supervisor, new supervisors should receive at least an hour of training. They should not be involved in testing responsibilities such as determining reasonable suspicion until properly trained.



#### Required supervisor-training content must cover supervisors' program responsibilities including how to:

- Recognize a possible alcohol or other drug problem (behavioral observation);
- Document behaviors that demonstrate an alcohol/drug problem (documentation);
- Confront employees with the problem (confrontation);
- Deal with alcohol use among employees with whom the supervisor used to go out drinking when the supervisor was in a line-staff position before becoming a supervisor;
- Initiate reasonable suspicion testing;
- Make appropriate referrals for assessment or assistance;
- Follow up with employees returning to work after a positive test;
- Operate consistently with any current collective-bargaining agreements.

In addition, initial supervisor training must include role play conducted as a part of a small group process by a qualified substance trainer. Refresher training does not have this requirement although honing the skills is encouraged.

#### Who presents supervisor training?

A qualified trainer must be involved in designing or presenting supervisor training. The qualified substance professional should be a skilled trainer with experience in training supervisors and must hold at least one of the same credentials as the qualified educator, except for the credential of being a DARE officer. In addition, the trainer may have a credential determined to be similar and acceptable by BWC.



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### What other options do employers have?

Employers may choose a number of approaches to meet the supervisor-training requirement, but there are additional constraints compared with meeting employee-education requirements. The basic model is still having a qualified substance professional who is an experienced trainer of supervisors with the ability to conduct effective group process. Other options include, but are not limited to:

- Having a qualified substance professional design the presentation materials that comply with the required content, but having a manager who is an effective, experienced trainer do the skill-building development activities. The key is to have a trainer who is sufficiently skilled in small group process and role play to address supervisor discomfort in dealing with alcohol-related issues. Many if not most supervisors moved up the ladder into their supervisor positions from being line staff; as such, they are typically supervising the same employees with whom they may have been drinking, making it more difficult to support interventions related to employee alcohol use. If there are questions that this manager cannot comfortably answer, a quali-

fied substance professional must respond to the questions within two business days;

- Using Webinars and finding another way to incorporate role play;
- Having a manager who is a skilled presenter attend a Train-the-Trainer class of at least four hours, where the required content is offered by a qualified substance professional, and the manager then presents the material to the rest of your supervisors. The limitation is the manager who attends a Train-the-Trainer class may not develop new materials in subsequent years, and the manager is unlikely to be capable of conducting effective small group process to break down supervisor discomfort related to alcohol use. As such, the Train-the-Trainer option is not recommended for initial supervisor training;
- Having online training on required topics for a required length of time as a refresher as long as a quiz is included, and all supervisors pass the quiz. This approach should not be used for initial supervisor training;
- Other approaches that meet the same considerations as the options above.





### Alcohol and other drug testing

At the heart of every DFSP is alcohol and other drug testing. You are responsible for putting in place compliant substance testing to deter and detect substance use and misuse in the workplace. Your written policy should clearly spell out all aspects of alcohol and other drug testing. This should include referencing cut-off levels in describing what it means to test positive. Be sure to follow the corrective action for testing positive in line with what your DFSP policy states.

You should plan and incorporate alcohol/drug testing into your written DFSP policy that clearly explains how this testing works, the types of protections built into the testing system and what employees can expect. It's important to include how you will address a refusal to submit to a test and employee actions to manipulate and undercut the testing system. This includes specimen dilution, adulteration/attempted adulteration and substitution. Most employers treat these as equivalent to testing positive, but your policy should clearly reflect the consequences for attempting to undercut testing through the actions noted above.

#### Determining testing/cut-off levels

Choosing the cut-off level for a positive alcohol test is another important employer consideration. We recommend .04 blood alcohol content (BAC) as a positive test. This matches the cut-off level used for federal alcohol testing at which the employer removes an employee from a safety-sensitive function and refers him/her to a substance abuse professional. This level is substantially lower than that used by other states to determine when a person operating a motor vehicle is considered intoxicated. However, scientific research supports this cut-off level, given the effect on workplace safety and employee productivity at or above this level.

This form of testing is known as systems presence testing. It serves as the only scientific, objective evidence that a certain level of substance exists within the employee's system. The employer contracts with a local collection site to facilitate collection and testing that follow the federal model. The collection site operates in compliance with federally-specified protocols that protect employees' rights and promote the accuracy and reliability of testing results. Employers must obtain the services of a medical review officer. You typically do this through consultation with a specimen-collection site to make sure the testing process meets required protections.

The federal government has identified cut-off levels for the drugs that are included in the DFSP. These include amphetamines, cocaine, marijuana, opiates and phencyclidine (PCP/angel dust). The federal government projects an effective date of Oct. 1, 2010, for including ecstasy with an established cut-off level as part of federal testing. This will modify the federal five-panel drug screen into a six-panel screen. The cut-off levels for a positive result for amphetamines and cocaine will change when ecstasy becomes the sixth drug. Another projected change is the requirement of the acetylmorphine (6-AM) test for heroin confirmation.

Regardless, your DFSP cut-off levels for the drugs for which testing will occur will mirror those used for federally-regulated testing. Employees testing at or above these levels are determined to have tested positive in violation of your drug-free policy.

Employers may choose to arrange testing for additional drugs, including those acknowledged as drugs of abuse in the company's local communities. These include prescription medications such as oxycodone (expanded opiates test), barbiturates, benzodiazepines, methadone

#### To receive a discount

The testing chart on pages 10 and 11 spell out specific DFSP testing requirements. Testing will include:

- Urinalysis for at least the drugs specified below;
- A preliminary test;
- A confirmatory test for all positive drug-test results;
- Breath or saliva with a confirmatory evidential breath test (EBT) for alcohol.

To determine the presence of alcohol in an employee's system — if an EBT is not available or reasonably accessible — make a blood test available to the employee.





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and propoxyphene. Before testing for additional drugs, you should consult with a qualified employment law counsel or a knowledgeable testing/policy vendor. Discuss costs with the collection site that serves as your link to the services of a laboratory certified by the Substance Abuse and Mental Health Services Administration (SAMHSA). Through such consultation, you will be aware of the cut-off levels recommended by the SAMHSA-certified lab for each additional drug beyond the ones required for the DFSP. Scientific research supports these cut-off levels. Laboratories select levels that are defensible in court challenges since they are buffering both their own legal liability as well as that of the employer.

As the employer you are required to pay the testing costs. There are some logical exceptions such as an employer requesting a re-test within one week of a positive test result. Employers should consult with their collection site's certified medical review officer for guidance on the process.

To conduct a re-test, the employer may arrange for the collection site to facilitate urine analysis from a different SAMHSA-certified laboratory. The employee has no right to choose which laboratory is used. The employer must reimburse the employee if the re-test is negative. The key is to spell out how you plan to handle such a request in your written DFSP policy. An applicant for employment has no inherent right to a re-test since the person is not an employee.

In addition, when an employee tests positive and is permitted to retain employment (such as for

the Advanced level of DFSP), an employer typically requires a signed contract offering a second chance. Since the employee triggered the need for further testing, you can require an employee to pay for the cost of follow-up testing. This can include a return-to-duty test and additional testing required to make sure the employee has not relapsed in violation of your DFSP policy and in contravention of the second-chance agreement to stay clean.

### Basic and Advanced testing requirements

If you participate in the Basic level program, you must arrange for the following types of testing, described more fully in the chart on pages 10 and 11: 100 percent pre-employment and/or new-hire drug testing (unless you are a public employer in which case you will ensure testing of 100 percent of positions you determine to be safety sensitive or special needs); reasonable suspicion alcohol and/or drug testing; post-accident alcohol and/or other drug testing; and return-to-duty alcohol and/or other drug testing following an assessment; and follow-up alcohol and/or other drug testing.

### Additional Advanced level testing requirement

In addition to the alcohol and other drug testing requirements for the Basic level, you must also include random drug testing of 15 percent of your average annual work force. For public employers, random drug testing applies only to safety-sensitive positions or functions, as determined by the employer.





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### Test type required Pre-employment New-hire

All new employees are subject to pre-employment testing (pre-hire). You may also use new-hire testing within the employee's probationary period or a combination of the two types of testing applied to 100 percent of applicants/new hires for private employers and 100 percent of safety-sensitive and special needs positions for public employers.

**Pre-employment** (drug test only) or **new-hire** (drug test only)

### Explanation Pre-employment New-hire

Pre-employment testing is required within a time frame defined by you (so many hours after a conditional offer of employment and before the employee begins any work activity with the employer).

You may do new-hire testing in addition to, in lieu of or in combination with pre-employment testing, as an unannounced test that occurs at any time during an employee's designated probationary period.

### Test type required Reasonable suspicion

**Reasonable suspicion** (may be an alcohol test, drug test or both)

Whenever possible, base reasonable suspicion testing on documentation and concurrence among the trained observing supervisor and a second trained supervisor.

### Explanation Reasonable suspicion

Reasonable suspicion testing is required when there is evidence that an employee is using drugs or alcohol in violation of the company's DFSP policy. In light of experience and training, you should draw the evidence from specific, objective facts and reasonable inferences. You may base such facts and inferences on, but are not limited to, any of the following:

- Observable behavior, such as direct observation of drug or alcohol use, possession or distribution, or the physical symptoms of being under the influence of drugs or alcohol, such as, but not limited to, slurred speech, dilated pupils, odor of alcohol or marijuana, dynamic mood swings, etc.;
- A pattern of abnormal conduct, erratic behavior or deteriorating work performance (e.g., frequent absenteeism, excessive tardiness, recurrent accidents), which appears to be related to substance use or misuse and does not appear to be attributable to other factors;
- The identification of an employee as the focus of a criminal investigation into unauthorized drug possession, use or trafficking;
- A report of alcohol or other drug use provided by a reliable and credible source;
- Repeated or flagrant violations of the company's safety or work rules that pose a substantial risk of physical injury or property damage and that appear to be related to substance use or misuse that may violate your DFSP policy, and do not appear attributable to other factors. Employers with employees subject to federal testing mandates, such as those of the U.S. Department of Transportation (DOT)/Federal Motor Carrier Safety Administration, may use the federal guidelines for reasonable-suspicion testing that focus on behavior documented just before, during or just after a safety-sensitive function.

### Test type required Post-accident

**Post-accident** (may be an alcohol test, drug test or both)

All employees who may have caused or contributed to an on-the-job accident, as defined below, will submit to a drug or alcohol test unless the accident investigation documents all of the exceptions identified below.

Administer this test as soon as possible after the employee receives necessary medical attention, or within eight hours for alcohol and within 32 hours for other drugs.

### Explanation Post-accident

Post-accident testing is required immediately following an on-the-job accident, as defined on the following page.



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### Explanation *con't.* Post-accident

Accident means an unplanned, unexpected or unintended event that occurs on the employer's property, during the course of the employer's business, or during working hours, or that involves employer-supplied motor vehicles or motor vehicles used in conducting the employer's business, or within the scope of employment, and results in any of the following:

- A fatality of anyone involved in the accident;
- Bodily injury requiring off-site medical attention;
- Vehicular damage in apparent excess of a dollar amount stipulated in the employer's DFWP policy;
- Non-vehicular damage in apparent excess of a dollar amount stipulated in the employer's DFSP policy.

As used in this rule, accident does not have the same meaning as provided in Division (C) of section 4123.01 of the Ohio Revised Code. The definition of this rule is not intended to modify the definition of a compensable injury under the workers' compensation law. Also, this definition of accident does not match the definition used by the DOT. BWC provides what we consider to be an "intelligent-testing design." As such, even after conducting an accident investigation and determining who may have caused or contributed to a work-related injury, we do not require employers to order a post-accident test if all the following apply:

- The injury was not serious even though off-site medical attention was required;
- The nature of the injury is common to the employee's job function;
- There was no violation of work rules;
- There was no reasonable suspicion indicated by the accident investigation.

### Test type required Random

**Random** (drug test only)  
Advanced level requires 15 percent of the total work force (only safety-sensitive positions for public employers) tested.

### Explanation Random

Random testing (an Advanced level requirement) involves an unannounced test that occurs at a pre-determined frequency among randomly selected employees. There must be equal probability of selection each time testing occurs.  
Random testing uses an objective and non-discretionary computer program operated and maintained by an outside contractor.

### Test type required Return-to-duty and follow-up

**Return-to-duty and follow-up** (may be alcohol test, drug test or both)  
You are to test all employees returning to duty after a positive test or after a time period specified in your policy. The employee must test negative on the return-to-duty test before you allow him/her back on the job.  
Follow-up testing is determined by employer with input from an employee assistance professional who performed the assessment  
The return-to-duty test is typically the first in a series of follow-up tests with a minimum (no set maximum) of four tests in the first year from the date of return to duty.

### Explanation Return-to-duty and follow-up

Unannounced follow-up testing for employees who have been referred for assessment and return to duty is random in terms of when testing will occur but not who will be tested. The first follow-up test will serve as a return-to-duty test and must be negative. It occurs before the employee resumes work activities and following a leave associated with a policy violation.  
For additional detailed information related to alcohol and other drug testing, please go to the following Web page: [www.ohiobwc.com/employer/programs/dfspinfo/dfspdescription.asp](http://www.ohiobwc.com/employer/programs/dfspinfo/dfspdescription.asp).



### Employee assistance

#### To receive a discount

Employee assistance is a cornerstone of any drug-free safety program. Our DFSP offers a progressive approach to employee assistance with additional services required for the Advanced level. Your written DFSP policy should clearly express management's commitment to helping employees with substance problems. The policy should include sharing assessment information, referral for assessment and a general commitment to help employees identify and deal with substance problems. This policy should inform the work force of available employee-assistance services. In addition, your written policy should identify who will pay for the services associated with an assessment. The DFSP permits reasonable employee co-pays. An employee assistance plan does not imply that you will provide treatment for an employee with a substance problem. However, you must identify a plan of action and the applicable resources for employees who seek help on their own, those referred by management for a possible problem with alcohol/drugs and those that have a positive alcohol or other drug test.

#### Basic level requirements

Employees who test positive for alcohol or other drugs must receive an explanation of the importance of having a substance assessment. Such an assessment can determine the nature and extent of the substance problem and identify appropriate corrective action. Regardless of whether the employer opts to terminate employees on a first positive test or chooses to retain the employee with a second-chance agreement, the supervisor or designated manager who counsels the employee should provide a list of qualified substance assessment resources in the community.

The DFSP does not prohibit termination of employment based on a first positive drug test. However, BWC encourages you to consider factors such as length of service and quality of performance in making a decision. Encourage the employee to get help even if the result of the positive test is termination of employment. This may help avoid the employee from remaining a substance abuser and becoming the problem of the next employer.

#### Advanced level requirements

If you are participating at the Advanced level, we expect you to increase the employee assistance you offer by pre-establishing a relationship with an employee assistance professional. This is the person or company to whom you will refer employees for a substance assessment who test positive. You must pay for the cost of these assessments. The most effective process where a first positive alcohol or other drug test results in a direct referral of the employee for an assessment is for the employee to





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sign a second-chance agreement. This agreement has a release of information that documents the employee is cooperating with the employee assistance professional. A subsequent positive test may result in termination.

There may be circumstances, defined by a collective-bargaining agreement or the employer's health care policy, that involve employee co-pays for the cost of an assessment. This may also be part of an employee's second-chance agreement to retain employment. We will review such situations as presented to us on a case-by-case basis to determine if such a policy is compliant with DFSP Advanced-level employee assistance requirements.

### Termination on a first positive

As an Advanced-level employer, to terminate an employee on a first positive alcohol or other drug test and still be considered compliant, you must present a compelling reason for the employment termination. Examples we have accepted in the past, on a case-by-case basis, include the nature of the employer's business (safety-sensitive or special-needs services) that might exempt the employer from the non-termination provision on a first positive requirement for the Advanced level.

When a union contract prevents termination on a first positive test, an employer should consult qualified legal counsel since contract terms and conditions may dictate disciplinary actions.

### Attempting to manipulate the testing system

For both levels of DFSP, an employer may treat a refusal to submit to a test, adulteration, attempted adulteration, dilution, specimen substitution and other attempts to undercut the testing process differently than testing positive. DFSP does not preclude termination in such situations if the employer's policy clearly states this consequence. Employers must document such situations. They must also produce this documentation when BWC staff requests it.

### BWC does not intrude on termination decisions

When requesting an exception, employers wanting to terminate an employee on a first positive test

and have BWC consider them compliant with DFSP advanced-level requirements must document the reason why they need to terminate the employee. We are not making a statement to employers NOT to terminate employees who test positive or attempt to undercut the testing system. These employment decisions logically belong to the employer. Rather, the issue turns on whether we consider the employer compliant or non-compliant with DFSP Advanced-level requirements for a premium discount. This occurs through dialogue and on a case-by-case basis.

### Drug-Free Safety Program Self-Implementation Workbook

You will have access to the *Drug-Free Safety Program Self-Implementation Workbook*, which serves as a reference guide to employers implementing a DFSP. While this guide explains the DFSP basics, the *DFSP Self-Implementation Workbook* offers a more detailed explanation of how to implement the program on a step-by-step basis. It's especially helpful if an employer receives no other assistance. As such, it includes guidance for every program element, suggested timing and check lists.

### DFSP annual report

BWC requires a DFSP annual report of your program. A properly completed sample report is available on our Web site at [ohiobwc.com](http://ohiobwc.com).

### Thank you for your interest

While this guide should provide you with the information you need to apply for the DFSP, or to understand the program requirements, additional information is available on our Web site at [ohiobwc.com](http://ohiobwc.com).

If you have applied and been approved for the DFSP, your account representative's name and contact information are available on your approval letter.

For more information, please call 1-800-OHIOBWC, and listen to the options. BWC's Customer Contact Center staff members will answer your questions or refer you to an expert who can do so if your questions are more complex.