



College of
Registered Nurses
of Manitoba

Guidelines for Reasonable Suspicion Testing

Reasonable suspicion testing is aimed at identifying a potentially unsafe or unfit registered nurse (RN) who is currently being monitored by the Complaints Investigation Committee (the Committee). Recognizing unsafe practice in an RN can be difficult. Differentiating between the subtle signs of impairment and stress-related behaviour is challenging.

Reasonable suspicion testing can serve as an effective deterrent to drug or alcohol misuse since it provides a method to identify RNs who engage in prohibited drug or alcohol related conduct.

Monitoring

One aspect of reasonable suspicion testing includes the employer being actively involved in components of the Committee monitoring. The RN is required to submit a practice report to the College. This report includes topics such as attendance and quality of general registered nursing practice. There can be a mutual benefit for the employer and RN employee when there is regular contact to establish or re-establish a professional relationship between them. This regular contact can provide the employer with a baseline behaviour pattern to refer to if the RN is exhibiting symptoms that may be indicative of impaired practice.

An RN being monitored by the Committee for substance use disorder might also have a monitoring term that allows the employer to request a urine test based on reasonable suspicion of relapse. Such a term may read as follows:

- Provide a urine sample for a drug screening test within four hours of the employer's request, on reasonable

suspicion of impaired practice and give consent to the employer(s) to report any test results or other information to the Manager of Professional Conduct at the College of Registered Nurses of Manitoba.

Monitoring for impaired practice is a challenging but necessary responsibility for client safety and supporting the RN. The employer can achieve this by having an understanding of substance use disorder, as well as the Committee's monitoring requirements which include observing for signs of impaired practice.

It is important to note that the presence of addiction, which is a life-long disease, does not equate to life-long impaired practice. The risk for relapse is at its highest in the first two years of recovery (National Council of State Boards of Nursing, Substance Use Disorder in Nursing, A Resource Manual and Guidelines for Alternative and Disciplinary Monitoring Programs). Therefore, intensive monitoring of the RN is required during first few years of returning to work.

Criteria when Assessing the Need for Reasonable Suspicion Testing

1. The decision to request a drug screening test must be based on the employer's observations.
2. Observations must be specific and contemporaneous and not based on a "hunch" or "gut feeling." Observations must be based on the behaviour and conduct of the RN. The employer must make the observations directly; observations are not to be based

on reports from other sources.

- The employer must be able to document specific behavioral or physical signs associated with potential drug or alcohol use.
 - The observations must be specific, grounded in objective criteria, and capable of being documented by verbal or written expression.
3. Observations which could give rise to reasonable suspicion include, but are not limited to:
- the odor of alcohol or drugs
 - impaired behaviour such as slurred speech
 - decreased motor coordination
 - difficulty in maintaining balance
 - marked changes in personality or job performance
 - unexplained accidents
 - impaired cognitive functioning and memory
 - diminished alertness
 - altered motor skills
 - impaired judgment
 - difficulty making decisions
 - inability to cope with stressful situations
4. Reasonable suspicion testing must be done justly, reasonably, fittingly and carefully. The employer must consider facts objectively.

Any RN who may be under the influence of, or impaired by alcohol or drugs, must be removed from duty. Do not allow the RN to drive themselves home.

Arranging for Testing

Suspicion testing must be conducted promptly after the determination to test is made. Arranging for testing is available through various agencies including CBI Home Health. If at all possible, the College's professional conduct team should be notified (during College business hours) of the employer's decision to test. It is recommended that testing be coordinated between the College and the employer.

If reasonable suspicion testing is required outside of the College's business hours, the employer should work through their internal policies and processes to allow for testing. Employers must notify the College of testing as soon as reasonably possible. The professional conduct team can be contacted by telephone at 204-774-3477.

Resources

College of Registered Nurses of Manitoba Publications

- *Substance Abuse/Misuse*

National Council of State Boards of Nursing

- *Substance Use Disorder in Nursing. A Resource Manual and Guidelines for Alternative and Disciplinary Monitoring Programs.*

North Carolina Board of Nursing

- *Checklist for Evaluation of Suspected Impairment*

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For more information please contact our professional conduct team at

204-774-3477

800-665-2027 (Manitoba toll-free)

Our publications are available on our website at www.crnmb.ca