



## Substance Abuse Policy

### POLICY

Full Life is a drug-free workplace, committed to protecting the health and safety of the people we serve and ensuring a safe workplace for all our employees. The purpose of this policy is to ensure that all employees are fit for duty and able to ensure the safety and well-being of the people we serve at all times.

### PROCEDURES

1. This policy applies to all new and existing employees of Full Life.
2. The use, possession, receipt, sale, distribution, transfer, or manufacturing of any illegal drugs by employees during working hours, on Full Life premises, in Full Life vehicles, or in connection with any work performed for Full Life, is strictly prohibited. For purposes of this policy, “**illegal drugs**” means any controlled substance whose possession, sale, or use is prohibited by Hawai'i or federal law.
3. Employees who are on duty and working at any location, or are on Full Life premises, are prohibited from having measurable levels of illegal drugs or alcohol in their system. Employees who are tested for illegal drugs and receive a positive test result may be disciplined, up to and including termination of employment. Applicants for employment may be denied employment if they receive a positive test result for illegal drugs. For purposes of this policy, the term “positive test result” means the presence in the employee’s body of alcohol or illegal drugs at or above the cutoff levels established by the State of Hawaii Department of Health.
4. Employees are prohibited from bringing onto Full Life premises, or possessing during work time, or possessing in any Full Life vehicle, any paraphernalia associated with the use, manufacture, transport, or sale of illegal drugs.
5. Employees are prohibited from using or possessing prescription drugs on Full Life property, or while on duty and/or working on any location, if such drugs have not been lawfully prescribed for the employee’s own use by a licensed healthcare professional. Employees taking prescription drugs which may affect their ability to perform essential job functions or to safely perform work are requested to notify their supervisor of such use.

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6. Employees and job applicants must cooperate with the request to submit to testing for alcohol or illegal drugs. Cooperation in such testing shall include, but is not limited to, the following:
  - Complying within a reasonable period of time with Full Life's request to be tested for alcohol or illegal drug use, and not delaying any such test requested by Full Life.
  - Signing a release and/or authorization to submit to a test for alcohol or illegal drugs, and to have the results of such a test reported to Full Life.
  - Not engaging in conduct which may affect the accuracy or results of a test for alcohol or illegal drug use. Specimens reported by a testing laboratory as adulterated or substituted will be considered a refusal to test by the applicant or employee.
  - Complying with any procedures for testing or directions for testing utilized by a licensed laboratory, or with the directions and procedures used in connection with an on-site screening test used for pre-employment screening.
  - Complying with any obligation imposed by this substance abuse policy.
  
7. If an individual's urine specimen is "negative dilute" (defined as having a creatinine level of less than 20 g./dl and a specific gravity of 1.003), the donor will be required at Full Life's request to refrain from drinking excessive fluids, and provide a second specimen with minimum possible advance notice. If the second specimen is also dilute, the Company may determine that the individual is ineligible for hire (if a job applicant) or subject to discipline up to and including termination (if an employee), unless the individual provides Full Life with a medical explanation for the dilute specimen which is deemed satisfactory by Full Life.
  
8. After receiving a conditional offer of employment, applicants for employment shall be required to undergo a test for use of illegal drugs.
  - Job applicants shall be tested for the presence of marijuana, cocaine, opiates, amphetamines (including crystal methamphetamine), and phencyclidine ("PCP").
  - Job applicants should note that over-the-counter medications or prescribed drugs may result in a positive test result. An applicant's positive test result for illegal drugs, or any violation by an applicant of this Substance Abuse Policy, may result in the applicant's ineligibility for hire.
  
9. Testing of Employees: Current employees may be required to submit to random testing for use of illegal drugs or alcohol, testing based on reasonable suspicion (see attached form), or any other testing for illegal drug or alcohol use which is based upon legitimate business reasons.

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- Employees shall be tested for the presence of marijuana, cocaine, opiates, amphetamines (including crystal methamphetamine), and phencyclidine (“PCP”).
  - Employees should note that over-the-counter medications or prescribed drugs may result in a positive test result. All positive tests shall be confidentially reviewed by a Medical Review Officer (MRO). The MRO, in consultation with the employee, determines if the positive result is due to legal (including medical marijuana) or illicit drugs. If the positive result is determined to be due to a legal (including medical marijuana) drug, a negative result is reported to Full Life. An employee’s positive test result for illegal drugs or alcohol, or any violation by an employee of this Substance Abuse Policy, may result in discipline up to and including termination.
10. All information and documents relating to any individual’s test for alcohol or illegal drugs test shall be treated as confidential. All documents relating to an employee’s or job applicant’s test results, or documents describing an employee’s or job applicants use of prescription medication, alcohol, or illegal drugs, are to be kept confidential and segregated from other personnel documents and records.

Approved by the Board of Directors on 10/28/10.