

Implementation Requirements			Findings of Analysis		
Model Element	Canadian Model Policy reference	Requirement	Indicators of Implementation	Gaps	Comments and Recommendations
Alcohol and Drug Policy	Responsibilities (page 2) Key Elements of an Alcohol and Drug Policy (page 4)	Develop a policy, endorse at most senior level, communicate across organization and provide funding necessary for implementation.	<input type="checkbox"/> Written policy signed by President, CEO or Board Chair <input type="checkbox"/> Policy supports the company's performance management systems <input type="checkbox"/> Copies of policy provided to all employees and contractors <input type="checkbox"/> Employees and contractors required to verify commitment to policy (e.g., sign off) <input type="checkbox"/> Copy of policy posted to company intranet <input type="checkbox"/> Review of policy with office staff ¹ <input type="checkbox"/> Review of policy at field safety meetings <input type="checkbox"/> Regular renewal of employee and contractor commitment to the policy (e.g., annual or with contract renewals) <input type="checkbox"/> Adequate funds budgeted		
Alcohol and Drug Work Rule	Alcohol and Drug Work Rule (Page 5)	Establish a work rule that sets specific limits against which employees can be tested to verify compliance with the policy.	<input type="checkbox"/> Written work rule incorporated in or referenced by the alcohol and drug policy <input type="checkbox"/> Limits consistent with the Alcohol and Drug Policy Model's work rule <input type="checkbox"/> Copies of work rule provided to all employees and contractors <input type="checkbox"/> Copy of work rule posted to company intranet <input type="checkbox"/> Review of work rule with office staff <input type="checkbox"/> Review of work rule at field safety meetings		
Roles and Responsibilities	Responsibilities (page 2)	Assign and communicate roles and responsibilities for managing risks associated with alcohol and drug use.	<input type="checkbox"/> Documented statements of responsibilities that cover all levels of management, administration and field operations <input type="checkbox"/> Distribution and review of statements of responsibilities <input type="checkbox"/> Clear knowledge of responsibilities, work rule, resources and consequences across all levels of assigned responsibility. <input type="checkbox"/> Feedback mechanism for commenting on responsibilities		

¹ Staff=employees and contractors

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Education	Education (page 7)	<p>Take reasonable steps to inform employees of:</p> <ul style="list-style-type: none"> workplace safety risks of alcohol and drug use company policy and programs employee (and family) assistance programs 	<ul style="list-style-type: none"> Communication of: <ul style="list-style-type: none"> Workplace safety risks of alcohol and drugs Alcohol and drug policy Work rule Alcohol and drug testing programs Consequences of violations Assistance available (EAP's, ERAPs and self help) Contact information for assistance programs Communication through: <ul style="list-style-type: none"> New employee orientations Agreements with contractors Office meetings Field safety meetings Handouts Posters Online training Classroom training Employee benefits packages Company web site Company directories 		
Self-help	Self-help (page 7)	<p>Ensure employees are aware that they can request help without discipline prior to:</p> <ul style="list-style-type: none"> a non-compliance with the policy compromised job performance 	<ul style="list-style-type: none"> Clear definition of self-help (i.e., when it can be requested, resources available, employee's responsibilities while obtaining treatment, rules for discipline) Communication of self-help process and options through the company intranet, employee orientations and safety meetings Definition and communication of responsibilities for foremen, supervisors and managers when responding to an employee's request for help Readily available contact information for assistance programs and other self-help resources (e.g., on company web site, in printed company directories) 		

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Compliance	Confirming Compliance with of the work rule (page 5)	<p>Understand the concept of reasonable grounds and use it appropriately to determine when it is necessary to confirm an employee's compliance with:</p> <p>3.1(a) - While at a company workplace or work site, use, possess or offer for sale</p> <ul style="list-style-type: none"> i. Alcohol, ii. Drugs other than those permitted under section 3.2 or iii. Any product or device that could tamper with any sample for an alcohol or drug test 	<ul style="list-style-type: none"> <input type="checkbox"/> Written definition of reasonable cause <input type="checkbox"/> Written procedure for using reasonable cause (with and without assistance from police or other authorities) to request that an employee confirm compliance <input type="checkbox"/> Form and recordkeeping protocol for documenting cases where reasonable cause has been used to confirm compliance with work rule <input type="checkbox"/> Communication of the definition, procedure, form and recordkeeping protocol to supervisors and managers <input type="checkbox"/> Feedback mechanism for commenting on procedure 		
Alcohol Testing	<p>Testing for Compliance with 3.1 (b) of the work rule (page 5)</p> <p>Requirements for Alcohol and Drug Testing Programs (page 9)</p> <p>Alcohol and Drug Testing Results (page 10)</p> <p>Appendix A - Alcohol and Drug Testing Procedures</p> <p>Appendix B - Substance Abuse Expert</p>	<p>Establish an alcohol testing program that complies with the standards of the U.S. Department of Transportation and the Alcohol and Drug Policy Model</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Written agreement with testing provider and lab <input type="checkbox"/> Form and recordkeeping protocol for conducting and documenting tests <input type="checkbox"/> Testing devices approved by the U.S. National Highway Traffic Safety Administration <input type="checkbox"/> Written procedure for determining when alcohol testing is required for: <ul style="list-style-type: none"> <input type="checkbox"/> reasonable grounds <input type="checkbox"/> incidents and near misses <input type="checkbox"/> safety-sensitive positions <input type="checkbox"/> return-to-duty and follow-up <input type="checkbox"/> random (optional) <input type="checkbox"/> site-access (optional) <input type="checkbox"/> Written procedure for conducting alcohol testing that clearly defines: <ul style="list-style-type: none"> <input type="checkbox"/> testing procedure and materials <input type="checkbox"/> qualifications, role and responsibilities of the tester <input type="checkbox"/> expectations of the individual being tested <input type="checkbox"/> recordkeeping protocol <input type="checkbox"/> protocol for reporting test results <input type="checkbox"/> Individuals conducting tests are appropriately trained, e.g.: <ul style="list-style-type: none"> <input type="checkbox"/> certified breath alcohol technicians (for testing in the field) <input type="checkbox"/> screening test technicians (for testing in labs) 		

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Drug Testing	<p>Testing for Compliance with 3.1 (b) of the work rule (page 5)</p> <p>Requirements for Alcohol and Drug Testing Programs (page 9)</p> <p>Alcohol and Drug Testing Results (page 10)</p> <p>Appendix A - Alcohol and Drug Testing Procedures</p> <p>Appendix B - Substance Abuse</p>	<p>Establish a drug testing program that includes screening and confirmation tests.</p> <p>Ensure confirmation testing that complies with the standards of the U.S. Department of Health and Human Services.</p> <p>Ensure confirmation drug tests are conducted by laboratories certified by the U.S. Substance Abuse and Mental Health Services Administration.</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Written agreement with testing provider and lab <input type="checkbox"/> Form and recordkeeping protocol for conducting and documenting screening tests <input type="checkbox"/> Screening test devices are fit for purpose (e.g., effective at testing for target drugs) <input type="checkbox"/> Written procedure for determining when drug testing is required for: <ul style="list-style-type: none"> <input type="checkbox"/> reasonable grounds <input type="checkbox"/> incidents and near misses <input type="checkbox"/> safety-sensitive positions <input type="checkbox"/> return-to-duty and follow-up <input type="checkbox"/> random testing of employees in safety-sensitive positions (optional) <input type="checkbox"/> site-access (optional) <input type="checkbox"/> Written procedure for conducting screening tests (particularly point-of-collection tests) that meets the same standards as required for laboratory testing and that clearly defines: <ul style="list-style-type: none"> <input type="checkbox"/> testing procedure and materials <input type="checkbox"/> qualifications, role and responsibilities of the tester <input type="checkbox"/> expectations of the individual being tested <input type="checkbox"/> recordkeeping protocol <input type="checkbox"/> protocol for reporting test results and requiring confirmation tests <input type="checkbox"/> Individuals conducting screening tests are appropriately trained <input type="checkbox"/> SAMHSA-certified laboratory used for confirmation tests <input type="checkbox"/> Written procedure for recordkeeping and reporting results of confirmation tests 		
Safety-sensitive positions	<p>Safety-sensitive position testing (page 5)</p> <p>Appendix C - Guide for Identifying Safety-sensitive positions</p>	<p>Identify safety-sensitive positions and develop testing programs to ensure employees or applicants entering those positions are in compliance with the alcohol and drug work rule.</p> <p>Establish a program for ensuring employees in safety-sensitive positions continue to comply with the work rule.</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Documentation of -safety-sensitive positions identified across the company <input type="checkbox"/> Program and procedures in place for conducting: <ul style="list-style-type: none"> <input type="checkbox"/> conditional-offer testing for applicants to safety-sensitive <input type="checkbox"/> qualification testing of existing employees in safety-sensitive positions <input type="checkbox"/> re-qualification testing <input type="checkbox"/> Employees in safety-sensitive positions are aware of their status and requirements for testing <input type="checkbox"/> Written procedure for recordkeeping and reporting results 		

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Duty to Accommodate	Violation of 3.1 (a), (c), or (d) (page 12)	Be prepared to accommodate employees who are found to suffer from alcohol or drug dependency and meet the definition of disabled in occupational health and safety regulations	<ul style="list-style-type: none"> <input type="checkbox"/> Management clearly understands the company's duty to accommodate disabled employees <input type="checkbox"/> Written procedure for assessing an employee for alcohol or drug dependency <input type="checkbox"/> Substance Abuse Expert used to conduct assessments and recommend treatment <input type="checkbox"/> Treatment programs available through employee and family assistance programs <input type="checkbox"/> Clearly documented and communicated expectations of employees for whom treatment is recommended, including: <ul style="list-style-type: none"> <input type="checkbox"/> requirement to comply with work rule during and after treatment <input type="checkbox"/> consequences for failure to attend assessment or follow recommended treatment <input type="checkbox"/> return-to-duty and follow-up testing <input type="checkbox"/> consequences for continued violations after return-to-duty 		
Responding to Violations	Consequences for Failure to Comply with the Alcohol and Drug Work Rule (page 11)	Define disciplinary responses to violations	<ul style="list-style-type: none"> <input type="checkbox"/> Written disciplinary procedure that defines how disciplinary measures are chosen in consideration of the: <ul style="list-style-type: none"> <input type="checkbox"/> nature of the violation <input type="checkbox"/> existence of prior violations <input type="checkbox"/> response to prior corrective programs <input type="checkbox"/> seriousness of the violation <input type="checkbox"/> Written procedure for terminating employees who fail to: <ul style="list-style-type: none"> <input type="checkbox"/> comply with 3.1 or 3.2 and are found to not suffer from a disability <input type="checkbox"/> attend assessment or follow recommended treatment 		
Company-sponsored events	Under Guideline for applying the policy (page 4)	Establish rules for including alcohol at company-sponsored events	<ul style="list-style-type: none"> <input type="checkbox"/> Written rules for provision and consumption of alcohol at company-sponsored events 		

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Due Diligence/Legal	Employer's Guide to Implementation (page 7)	Seek legal counsel to verify due diligence and regulatory compliance for the alcohol and drug policy and its associated programs	<ul style="list-style-type: none"> <input type="checkbox"/> Legal review of: <input type="checkbox"/> Alcohol and Drug Policy <input type="checkbox"/> Procedure for using reasonable cause to confirm compliance with section 3.1(a) and 3.1(d) <input type="checkbox"/> Alcohol and drug testing procedures and recordkeeping protocols <input type="checkbox"/> Responses to violations <input type="checkbox"/> Duty to accommodate 		
Measurement		Mechanisms in place for measuring implementation	<ul style="list-style-type: none"> <input type="checkbox"/> Employee surveys to assess knowledge and acceptance of policy <input type="checkbox"/> Periodic discussion item at safety meetings <input type="checkbox"/> Regular (e.g., annual) formal review of the policy, work rule and associated programs for continuous improvement <input type="checkbox"/> Review of testing programs to measure compliance with standards U.S. DOT and SAMHSA standards <input type="checkbox"/> Review of violation statistics against education and communication efforts <input type="checkbox"/> Review budgets to determine if they are suitable to meet implementation expectations 		