

CHRISTIAN FAMILY CARE SUBSTANCE USE POLICY

CFC seeks to provide a safe, healthy, and productive environment for our employees, volunteers, and clients, and to protect human life as well as CFC property and witness in the community. Abuse of alcohol, drugs, and controlled substances impairs employee's judgment, resulting in increased safety risks, injuries, and faulty decision-making. To enhance job productivity and promote the health and safety of employees, CFC has adopted a comprehensive substance abuse policy, the terms of which are set forth below:

1. Policy and Objective

This policy outlines the practice and procedure designed to prevent substance use and abuse in the workplace and/or while performing work duties. This policy applies to all employees and applicants for employment at CFC. Under this policy, substances include alcohol, marijuana (cannabis products), illegal drugs, the use of synthetic drugs (i.e., spice/K2, bath salts, salvia, etc.), inhalants, prescriptions, and over-the-counter medications.

Attempting to perform work duties or being in the workplace with alcohol, marijuana (cannabis products), drugs, or drug metabolites in his or her system is prohibited. Additionally, the possession, manufacturing, dispensation, sale, distribution, concealment, or illegal transportation of any alcohol or illegal chemical/drug substance by employees is prohibited. Misuse of legal drugs will be looked upon in the same manner. Impairment while performing job duties or in the workplace will also be looked upon in the same manner.

The aforementioned prohibitions extend to company-owned vehicles, as well as personal vehicles used for company business or parked on company property. Further, employees are prohibited from bringing drug paraphernalia onto CFC property at any time. An employee who possesses, promotes, or distributes such paraphernalia while on CFC property or business will be subject to disciplinary action up to and including termination.

Employees who are convicted of off-the-job drug activity may be in violation of this policy. In deciding what action to pursue, management will take into consideration the nature of the charges, the employee's present job assignment, the employee's record with CFC, other factors relating to the impact and circumstances of the employee's conviction, and the impact on the reputation of CFC.

If an employee becomes aware of a violation of this policy, he or she should report it immediately to his or her supervisor and/or Staff Care so the matter can be investigated promptly, and action taken where necessary.

CFC will fully cooperate with the enforcement of local, state, and federal laws regarding those who violate any law on CFC property or at a CFC-sponsored activity.

Employees who have substance use or abuse problems are encouraged to disclose this to their supervisor or Staff Care. CFC will make every attempt to assist employees who self-report and may offer referrals for treatment by reputable rehabilitation programs. This acknowledgement and referral process should not be construed to mean that CFC will tolerate substance use or abuse as defined above.

Prohibited drugs are those considered illegal under federal or state law, or as outlined in the Controlled Substances Act of 1970.

Over the Counter and Prescribed Drugs. Over-the-counter drugs and drugs prescribed by a physician for an employee's personal, medically necessary use in quantities not exceeding reasonable or specified dosage requirements are not illegal drugs pursuant to this policy. Any employee who is taking medication prescribed by a physician must be able to provide a record of the prescription, including the name of the medication, the prescribing physician's name, and any limitations the prescription may place on the employee's ability to perform assigned duties. Further, employees taking prescription or non-prescription

medication are responsible for being aware of any potential effect such drugs may have on their reactions, judgment, or ability to perform their duties, and if impairment is possible, to report such use to Staff Care prior to reporting to work. With input from the employee, CFC will determine if the employee should work in his regular job, be temporarily assigned to another job, or placed on a leave of absence.

Medical Marijuana. Christian Family Care complies with the Arizona Medical Marijuana Act (“AMMA”). To maintain the highest standards of employee safety, use of, being under the influence of, or impairment from medical marijuana at work or while performing employment duties is prohibited. If a person is using medical marijuana outside of work hours, he or she is subject to discipline or termination if there is an instance of “documented impairment” while at work. “Documented impairment” is defined as a situation where a supervisor has observed an impairment and/or conduct/behavior of an employee which displays characteristic signs of drug abuse at work. For a supervisor to document impairment, there must also be a positive drug test. A supervisor can request a drug test if they have a “reasonable suspicion” of impairment. An employee with a medical marijuana card can be terminated or subject to discipline if there is a drug test showing amounts more than the standards (marijuana metabolites: initial cut off 50ng/ml and after confirmatory THCA test, cutoff of 15ng/ml) as well as a documented impairment.

Confidentiality. Information and records relating to positive test results, drug and alcohol dependencies and legitimate medical explanations provided to Staff Care shall be kept confidential to the extent required by law and maintained in secure files separate from normal personnel files.

2. Drug and Alcohol Testing

At management discretion, and in accordance with applicable law, CFC reserves the right to conduct drug testing at any time. There may be specific requirements within contracts between CFC and other entities (public or private) that require certain employees or employee groups to be routinely or randomly drug tested. Failure to comply with this policy will result in disciplinary action up to and including termination. The Staff Care department is responsible for administration of this policy.

- **Pre-Employment Drug Testing:** Each candidate conditionally hired for employment will be required, as a condition of employment, to undergo drug testing. If a finalist tests positive on the initial test, a confirmatory test will be conducted at a certified laboratory. If the confirmatory test is positive and is determined to be in violation of this policy, the candidate could be ineligible for employment. All offers of employment are conditioned upon the candidate passing a drug test. Employees who are rehired are also subject to pre-employment drug testing.
- **Random Testing:** CFC may randomly test employees for compliance with its drug-free workplace policy. As used in this policy, "random testing" means a method of selection of employees for testing that will result in an equal probability that any employee from a group of employees will be tested.
- **Reasonable Suspicion:** Employees may be asked to submit to drug and/or alcohol screening when their workplace conduct suggests that they may have violated this policy. Suspicion may be based on employee’s appearance, behavior, and/or workplace performance. Reasonable suspicion will be based on specific, objective, and clearly expressed facts.
- **Post-Accident Testing (Including Job-Related Injury or Accident):** CFC reserves the right to require a drug and alcohol screening after an on-the-job accident or incident, based on relevant state law.
- **Rehabilitation Testing:** CFC may require employees who take a leave of absence to undergo drug- or alcohol rehabilitation to submit to drug and alcohol screening before returning to work from their leave of absence and periodically for a time thereafter.

3. Specimen Collection

Test Subject Privacy: Appropriate professional personnel will supervise the collection of urine and breath specimens for testing. In the absence of a reasonable suspicion that the test subject will alter or substitute a urine specimen, the collection personnel will not directly observe the collection of the urine specimen.

Chain of Custody Procedures: CFC, or its third-party testing designee, will take steps to preserve the chain of custody of specimens to ensure testing accuracy.

4. Specimen Testing Procedures

The kinds of substances tested for will include the following substances or their metabolites:

- Cannabinoids (THC) (marijuana compounds)
- Cocaine
- Amphetamines
- Opiates
- Phencyclidine (PCP)
- Barbiturates
- Benzodiazepines
- Methadone
- Methaqualone
- Propoxyphene

CFC reserves the right to conduct a periodic review of the foregoing list and to add additional drugs to the list and will provide employees notice of the same. A positive drug/alcohol test shall mean test results with a detectable number of drugs that are illegal under federal or state law, or prescription drugs in the employee's system for which the employee or applicant does not have a valid prescription.

The drug screen analysis is accomplished through urinalysis testing. Alcohol testing may be performed through breath or blood analysis testing. Samples will be collected in a sanitary environment designed to maximize employees' privacy while minimizing the possibility of sample tampering. All drug tests are performed by a government-certified outside laboratory. All government-certified outside laboratories strictly follow chain of custody guidelines to ensure the integrity of the testing process.

If there is a positive drug and/or alcohol result on the initial screening test, the laboratory or blood alcohol technician will automatically do a second test to confirm the results ("confirmatory test"). The confirmatory drug test will be performed using gas chromatography/mass spectrometry or other scientifically accepted method. A positive breath alcohol test will be confirmed by a second breath test. In the event the drug and alcohol test result are diluted, the employee or applicant may be required to re-test.

5. Suspension Pending Test Results

Pending receipt of test results, employees may be suspended without pay. If an employee is suspended and the final confirmatory test result is negative, the employee will be reinstated as soon as possible with full back pay.

6. Right to Explain Test Results

Employees have a right, on request, to explain their positive test results in a confidential setting. If there is a positive test result, the employee or applicant will be notified by the Medical Review Officer (MRO), a licensed physician, to provide acceptable supporting documentation explaining the positive test result. The MRO will receive the laboratory results of the testing procedure. The MRO will have knowledge of substance abuse disorders and the appropriate medical training to evaluate positive results, medical histories, and any other relevant biomedical information. The MRO will review all medical records made available by the tested employee or applicant when a confirmed positive test could have resulted from legally prescribed medication.

If the results of the initial test are negative, the testing laboratory will report the results to the MRO retained by CFC. The MRO or the testing laboratory reports the negative results to CFC. In this instance, no additional tests on the specimen will be done.

If the results of the initial test are positive, that is, if the results exceed the permitted levels for any of the drugs tested for or for alcohol, a second confirmatory test shall be performed. Only specimens that are confirmed positive on the second (confirmatory) test are reported positive to the MRO for review and analysis.

An employee or applicant who does not pass a drug test may request that the original sample be analyzed again by a government certified laboratory at his or her expense. All requests for an independent analysis must be made within five working days of notification of positive test results directly to the MRO.

7. Consequences of Confirmed Positive Test Results

Applicants: Subject to CFC's obligations under the AMMA, any applicant who tests positive on a confirmatory drug test required by CFC may not be further considered for employment.

Employees: Subject to CFC's obligations under AMMA, any employee who tests positive on a confirmatory test on any drug and alcohol test required by CFC could be subject to disciplinary action, up to and including termination based upon the review by the Executive Team and Staff Care.

8. Refusal to Submit or Tampering

An employee or applicant has the right to refuse to undergo a drug or alcohol test. However, refusal to submit to testing or to fully cooperate with testing violates this policy and may result in immediate termination or discontinuation of consideration for employment. Similarly, laboratory results that indicate tampering with or adulteration (e.g., diluted, altered, etc.) of a test specimen violate this policy. Employees and applicants who fail to cooperate with the testing procedures or who fail to provide an adequate sample that is not medically validated violate this policy.

9. Confidentiality of Test Results

CFC will not disclose test results except as authorized by the test subject in writing or as authorized, permitted, or required by applicable law. Employees are entitled, upon request, to their written test results.

Any employee who has been observed using or possessing illegal drugs or alcohol during work time, including lunch breaks, or on CFC premises is in violation of this policy. Disciplinary action up to and including termination may be imposed regardless of whether the employee is tested and found to have alcohol, illegal drugs, or unprescribed drugs in his or her system.

CFC reserves the right to amend any or all this drug and alcohol policy, or to terminate it in its entirety should either action be deemed necessary. Any questions concerning this policy should be directed to Staff Care.