



Training Supervisors

Supervisors play a critical role in addressing opioids in the workplace. They are often the first to notice a difference in an employee's performance, personality and activities, and they may be the first to notice impairment. It is imperative to provide them with the tools they need to protect the safety of the workplace, the privacy of employees, and to help them help other.

There are two important components for supervisors to be aware of. One is what to do when a supervisor suspects an employee is impaired at work. Impairment can result from many different scenarios in addition to alcohol or other drug use, including fatigue, medical conditions and medication use, and stress. It is important not to assume cause when noticing impairment.

The other is what to do when a supervisor suspects an employee has a substance use disorder (SUD). Though these two scenarios may be related, they are different. It is not the role of the supervisor or employer to diagnose a possible substance use disorder (SUD), but a supervisor may notice signs that an employee has developed a SUD, or is experiencing a different issue that could lead increased risk for impairment in the workplace.

TRAINING TOPICS

Supervisors should be trained on the following:

- The organization's Drug Free Workplace Policy (DFWP) and how it relates to impairment
- Communicating with employees about impairment, the DFWP and where they can go for more information
- Understanding substance use disorders (SUDs) and their potential relationship to impairment
- Recognizing symptoms of impairment and how to respond in an impairment-related crisis
- Drug testing procedures and other testing procedures related to impairment; consequences of non-compliance with testing procedures
- Required procedures and documentation when workplace impairment is observed
- Knowledge of appropriate resources to offer employees who need to address problematic substance use as well as stressors that can cause impairment – family, financial, and education/training, performance demands, etc.
- Using "person-first" language in the workplace, for example "person with a substance use disorder" instead of alcoholic, addict or drug abuser (learn more about the role language plays in Understanding Stigma)

Training on substance use disorders

In order to effectively address SUDs in the workplace, supervisors must understand their complexity. SUDs are a long-term, relapsing brain disease. This disease is not caused by moral shortcomings or weakness of character, and it is not a choice that someone makes. It is not the job of the supervisor to act as a counselor or to diagnose an SUD, but training supervisors to understand SUDs is a critical part of reducing stigma and supporting employees who have SUDs.

Recognizing the signs of an SUD or opioid use disorder (OUD) is not the same as recognizing impairment. Impairment may be just one symptom of someone with an SUD. A supervisor may suspect an employee has an SUD if job performance is declining, an employee is withdrawn or less engaged, recurrent tardiness is an issue or other behavioral concerns are present. If the supervisor suspects that an employee has developed an SUD, they should follow these general guidelines.

- Document the circumstances of concern or performance issue, including date, time and context; include factual statements, and not assumptions or judgments
- Follow the company's protocol for addressing performance issues; discuss the performance issue itself, and create and document a plan to address it
- Do not ask the employee if they have an SUD or anything else about personal circumstances
- Consequences for lack of improvement should also be discussed and documented
 - Review options for the employee should they need additional services. Remind them of the company's Employee Assistance Program, the appropriate contact person in HR if the employee thinks other accommodations may be needed, and other company-specific support programs

Sometimes, an employee might approach a supervisor voluntarily to disclose an SUD. If that happens, the supervisor should refer the employee to HR for next steps.

Recognizing Impairment

Training supervisors to recognize impairment is essential to protect the safety of the organization. Impairment can manifest in different ways:

- Physical signs and symptoms including a rapid shift in physical appearance, tremors, unsteady gait, loss in manual dexterity, working in an unsafe manner, or the odor of alcohol or other drugs
- Concerning or changing behavior pattern such as inappropriate verbal or emotional responses or behaviors, unusual irritability, memory lapses, unusual isolation from colleagues, lack of concentration, confusion, forgetfulness or lying
- Job performance changes including calling in sick frequently, unexplained tardiness, early departure, extended breaks, errors in judgment, deterioration in performance and quality of work, or testing positive on a drug screen

Though these signs, symptoms and behavior changes do not necessarily mean that someone is impaired or has an SUD, they are cause for concern. Avoid jumping to conclusions about *why* someone is acting differently, but make sure to address the situation. See Opioids, Safety and Impairment to learn more.

WHAT TO DO WHEN IMPAIRMENT IS SUSPECTED

When a supervisor suspects an employee is impaired in the workplace, it can be tough to know how to address it. Here are some tips for what supervisors can do, adapted from the Centre for Mental Health in the Workplace.

Setting up the conversation

- Immediately escort the employee away from co-workers for a private discussion
- If the employee may present a risk to self or others, address safety issues immediately
- Call for medical assistance if needed
- Request that another manager, HR professional or union representative witness the discussion

Talking with an Impaired Employee

If an employee denies impairment even when they are clearly impaired, remember that they may not be thinking clearly. Reasonable, truthful conversation may not be possible until the employee is no longer impaired. Further conversation on the incident should take place the next time the employee returns to work.

Starting the conversation

- Objectively state what has been observed with a nonjudgmental, fact-finding approach
- Provide an opportunity for the employee to explain the behavior, and document the explanation along with the supervisor's observations

Other considerations

- Provide safe transportation home, such as a taxi or other ride service system; impaired people should never drive, bike or use other self-powered transportation
- If an employee voluntarily discloses impairment, follow the same steps as above; workplace impairment policies should be flexible enough to deal with an employee who voluntarily discloses impairment without being unnecessarily punitive

As always, language is important. Accusatory statements can create defensive reactions that do not encourage cooperation, and may not be true. Stick to objective observations that do not assume cause. All conversations should center on work performance related issues.

Supervisor states objective observation:

Do not accuse:

I noticed that you are responding more slowly than usual, you are slurring your words, and I can smell marijuana when I stand beside you.	You look high.
I noticed that you fell asleep on the job, and have been unfocused and confused on the job and about your duties.	Are you on drugs?
I noticed that you were not at your workstation when I expected you to be here. Your eyes are red and you are walking as though you can't keep your balance.	Are you drunk?

RETURN TO WORK POLICIES

When employees return to work, it is important to follow all policies and procedures in place to help them reintegrate safely and to address concerns from co-workers.

- Before the employee returns, supervisors and/or HR can have conversations with co-workers that allow their concerns to be heard; focus on solutions to workplace issues, while respecting the privacy and confidentiality of the returning employee
- HR, in conjunction with management will assess the need for accommodation; depending on the outcome of this assessment, the employee's return to work may be delayed pending fulfillment of certain conditions (completion of an EAP referral for assessment or other procedures)
- Once the employee has returned to work, conversations should be supportive; focus on work and performance issues that need to be addressed
- This policy should define consequences for potential relapse or subsequent impairment
- Both supervisor and employee should have a clear process to follow if the employee's impairment or problematic substance use in the workplace reoccurs

This training should be re-evaluated and updated yearly. Ensure that feedback is solicited from supervisors on what works and what needs to be done differently.



Key Steps for Employers

- ✓ Supervisors must be trained on recognizing impairment, and potential development of a substance use disorder
- ✓ Supervisors must understand policies and procedures in place if impairment is identified
- ✓ Supervisors must protect the privacy and confidentiality of the employee in question
- ✓ Supervisors must be trained in using professional, nonjudgmental language with employees who may be impaired or showing signs of a substance use disorder

Legal Implications

Every component of the drug free workplace program must:

- Be developed in partnership with the organization's legal advisers
- Safeguard employee confidentiality
- Comply with federal, state and local regulations, including but not limited to OSHA, the Americans with Disabilities Act, Mental Health Parity Act and HIPAA
- Comply with union and industry regulations

The Opioids at Work Employer Toolkit has been developed to raise awareness with businesses about how to respond to the risks associated with the misuse of opioids and other drugs. The content is meant for educational purposes only and not for the purpose of providing legal advice or replacing the work needed to develop a responsible drug-free workplace program. As such, it should not be used as a substitute for consultation with a legal professional, or other competent advisor.