

# International Workplace Screening

Challenges & Best Practices



# Important Components

- Country-specific policy development
- Specimen collections
- Laboratory analysis
- Medical Review Officer (MRO)
- Third-party administration



# Major Obstacles Policy Development

What are the laws & guidelines for each country?

- Is drug testing allowed?
- Is pre-employment testing allowed?
- Are random programs permitted?
- What steps must be taken to justify random testing?
- Can different methodologies be used?

# European Case Study

## Drug Testing Rules & Regulations

- Every country has its own set of legal requirements
- Most countries do not have drug testing laws comparable to U.S.
- If governed, it is primarily by labor agreements, health regulations, and privacy laws.



# Best Practices

## Sample: Country-Specific Matrix

NORWAY (Revised March 2012)		See Acts Section Below Chart
<p><b>WHAT YOU SHOULD KNOW:</b> Norway's privacy laws place strict limitations on drug testing. The safest policy is one that limits drug testing to employees and applicants for safety-sensitive or "special risk" positions.</p> <p><b>KEY ISSUES AT A GLANCE:</b></p> <p>Mandatory National Law: No</p> <p>European Guidelines For Urine: Recommended</p> <p>European Guidelines For Hair: Recommended</p> <p>Oral Fluid Testing Permitted: Not Yet Available</p> <p>Union Agreement Required: Not Necessarily</p> <p><small>DISCLAIMER: This information is provided for educational purposes only. No attorneys were employed in the research and construction of this chart. Reader retains full responsibility for the use of the information contained herein.</small></p>		
POLICY ISSUES	Status	Comments
WRITTEN POLICY	Recommended; May Be Required	Union agreements may require a written policy; union involvement in the formation of a policy may be required; having a written policy is highly recommended. See Acts per National Wage Agreement's Supplementary Agreement V.
NOTICE OF POLICY	Required	Notification is required when a new policy is implemented and when changes are made to an existing policy involving "control measures." See Acts per National Wage Agreement's Supplementary Agreement V.
CONSENT TO TESTING	May Be Required	Privacy laws limit who can be subject to testing and under what circumstances drug test results may be reported. For this reason, employers should obtain employees' consent to testing; union agreements may require consent.
DRUG TESTING	Permitted with Restrictions	Generally, Norway's privacy laws apply to job applicants as well as to employees.
Applicant	Permitted with Restrictions	Generally, Norway's privacy laws apply to job applicants as well as to employees. Testing should be limited to applicants for safety-sensitive positions.
Reasonable suspicion (for cause)	Permitted with Restrictions	Testing should be limited to workers in safety-sensitive positions. Union agreements are strongly advised where applicable.
Post-accident	Permitted with Restrictions	Testing should be limited to workers in safety-sensitive positions. Union agreements are strongly advised where applicable.
Periodic exam	See Comments	May not be permitted. Limited to critical position employees if at all. Union agreements are strongly advised where applicable.
Return-to-duty	See Comments	May not be permitted. Union agreements are strongly advised where applicable.
Random	Permitted with Restrictions	Testing should be limited to workers in safety-sensitive positions. Union agreements are strongly advised where applicable.
Follow Up		May not be permitted. Union agreements are strongly advised where applicable.
Transfer to Safety-Sensitive Job	Permitted with Restrictions	Testing should be limited to workers in safety-sensitive positions. Union agreements are strongly advised where applicable.
ALCOHOL TESTING		No prohibition on alcohol testing, but no guidance provided.
SUPERVISOR TRAINING		Highly recommended.
EMPLOYEE ASSISTANCE PROGRAM		Employee assistance programs may be required as part of union agreements.

## Policy Development

- Conduct extensive country-specific research
- Output results into comprehensive matrix
- Use data to create country-specific workplace policies
- Perform regular updates to keep data current



# Major Obstacles Collection Sites

How do you orchestrate specimen collections across different countries?

- How do you find a site?
- How do you ensure they follow proper procedures?
- Is it possible to train and certify collectors?
- Can they use multiple testing methodologies?
  - Urine, hair, oral fluid, breath alcohol



# Best Practices

## European Case Studies

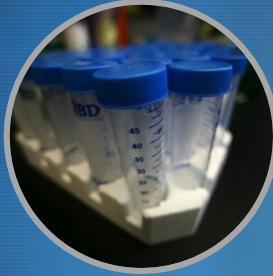
### Collection Sites

#### **Common Setup Scenario**

- Majority of testing is for O&G employers
- Databases exist for finding qualified providers
- Requires after-hours communications due to time variances
- Communications from 3rd party to site re: agreements and client requirements are done via email
- Collector training may be required
  - Typically, how to use specific labs' testing products
- Setup can be finalized in 1 to 2 days

#### **Uncommon Setup Scenario**

- Outside of the O&G hubs, start with trained medical professional to ensure equality
- Case Study: Western Romania
  - Located clinic with location near client for instant testing
  - Language barrier required translator
  - Romanian law required instant readings by more advanced staff at another location (2 hrs. away)
  - Clinic made special arrangements for transportation



# Major Obstacles Laboratories

How do you establish partnerships with qualified providers?

- How do you find them?
- Are they certified?
- What are their panel options?
- What about shipping back to the U.S. for analysis?
  - What about Customs?
- What are their capabilities for integration with IT platforms?



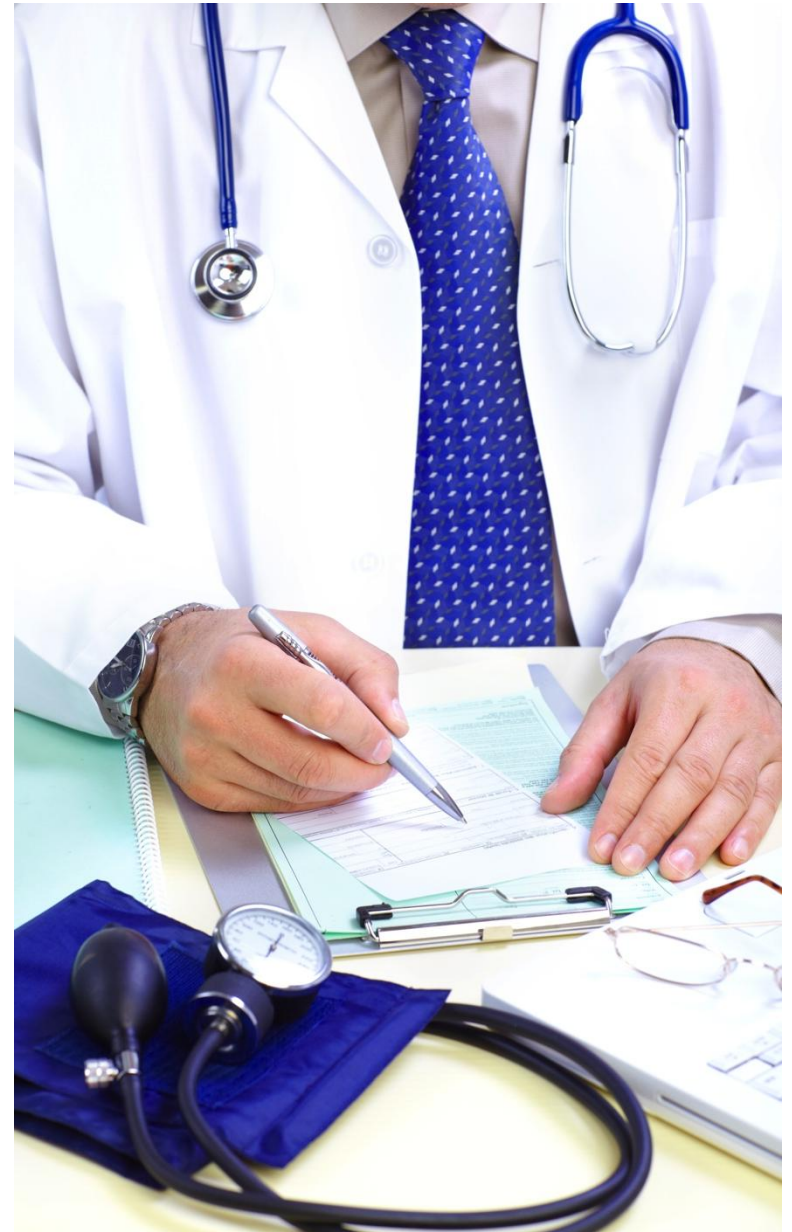
# Best Practices Laboratories

- Dedicated international staff required to research and locate certified labs, and to establish dialog for service partnership
  - Certifications
  - IT integrations
- Multiple forms of communication needed, e.g. phone, email, Skype
- Translation capabilities needed between administrator, lab, and collection site
- Cultural differences must be taken into consideration and may require extra communications, Q&A sessions, and special coordination

# Major Obstacles Medical Review

What options are there for qualified MRO services?

- How do you find a provider with a global reach?
- How do you manage language barriers?
- What about time differences?
- How do you ensure proper licenses and certifications?



# Best Practices

## MRO

- Identify firms that can accommodate multiple countries
- Work through local laboratories to identify MRO's
- Ensure MRO has the ability to accommodate:
  - Time zones
  - Language barriers
  - Country-specific regulations



# Major Obstacles

## Third-Party Provider

What should you look for when selecting a provider to manage your international needs?

- Do they have established relationships with service providers?
- Do they have processes in place that work?
- What are their best practices for handling the major obstacles?



# International Third-Party Administrator

## Results of 2012 Survey of Drug Testing Providers

- 30.6% active internationally for “several years”
- 9.3% active internationally for the past “couple of years”
- 14.6% never sold services outside of U.S., but would like to
- 41.6% said finding qualified providers one of the biggest obstacles
- 36.6% said shipping specimens to U.S. was a serious challenge



*Survey Conducted by WFC & Associates*

# Best Practices Administration

- Must have IT capabilities for lab integrations, and online reporting and tracking
- Local service presence is key for managing and implementing client programs, as well as facilitating processes with service providers
- Dedicated international team must be used to manage processes effectively
- Country-specific policy development capabilities is imperative

# Questions & Answers

