

WORKPLACE IMPAIRMENT Determining Whether an Employee Is Fit for Work

By Barbara Martin

Consider this scenario: You walk out onto the warehouse floor and see a forklift operator heading toward a forklift. She is not walking straight and steadies herself on a pallet, then stumbles a bit getting to the lift. As you call out to her and walk over, you can see she is panting a bit and holding her shoulder.

Now consider another scenario: You head out into the yard and see a driver heading toward a truck. He is holding his hand to his head and seems to have trouble climbing into the cab. You call to him and walk over. He does not seem to recognize you and he is slurring his words.

Many supervisors would mentally wrestle with these situations. Are these workers OK? Do I speak to them and find out if there is a reasonable explanation for their behavior? Do I send them for a drug test? How do I approach that topic? What do I do?

Scenarios similar to these play out daily in the workplace. Despite training requirements in many situations, reasonable suspicion (i.e., for cause) is the least common reason for requesting a drug or alcohol test, although it has the highest positivity rate (Quest Diagnostics, 2023). This is also a difficult discussion to have with an employee, but it does not have to be. First, it is important for the employer to identify the real issue.

Safety Considerations

Is the worker able to complete the job safely? In each of the scenarios described, other possibilities besides drug or alcohol use could explain the worker's impaired appearance. In the first scenario, the forklift operator is exhibiting signs of

a possible heart attack; in the second, the driver is showing signs of potential stroke (CDC, 2024a, 2024b).

Regulatory and policy requirements should also be taken into account. If the employee is a commercial driver's licence driver (or covered under another U.S. Department of Transportation mode), then once the decision is made about whether to call 9-1-1, the testing requirement must be managed. Many regulations not only allow but require testing under reasonable suspicion (FMCSA, 2023).

Impairment Is Key

The cause of impairment should not be the focus. Rather, the question should be whether the employee is a danger to themselves or others. Outside of recognizing a medical emergency, determining the reason for the issue is not the goal. First, determine whether a medical emergency is involved, such as hypoglycemia or a severe allergic reaction. If unsure, call 9-1-1. Whether the cause is fatigue because of a new baby at home, illness such as COVID-19, head injury, reaction to a change in prescription medication, or illicit drug use, it is irrelevant to the initial action: Remove the worker from duty and get the individual to a safe place for assessment (Stroer, 2020).

Impairment can be a physical issue or can be an impact on a person's mental acuity. Testing is simply part of the process, whether by regulation or policy. Impairment is typically thought of as resulting from substance use, addiction or dependence, whether legally used or not. The Canadian Human Rights Commission (2017) says that the appearance of impairment at work can include "odor of alcohol or drugs, glassy or red eyes, unsteady gait, slurring [and] poor coordination." This does not tell the whole story.

Matters to consider:

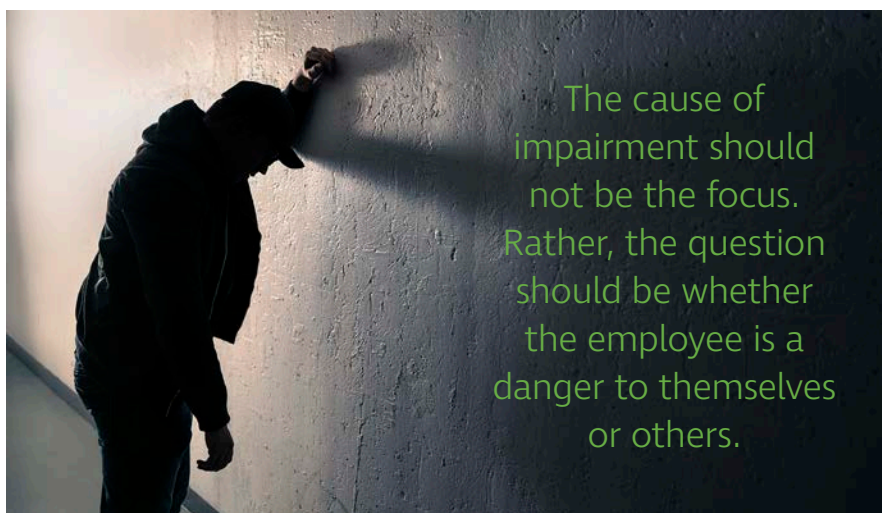
- Could the impairment create a safety risk to the employee or others?
- Can the job or task be completed safely by a worker whose physical or mental abilities have been affected by fatigue, illness, injury, medication or substance use?
- Is keen judgment required to complete the activity?
- Does the task involve driving, using heavy equipment or operating machinery? These are high-hazard tasks with the potential for serious incidents when performed by impaired individuals.

The primary concern of the employer is focused on the ability of a worker to safely complete the job. Applicable terms vary—"fit for duty," "fitness to work," "physically qualified"—to portray a person's ability to properly complete a designated task or duty safely. Substance use, mental health issues, fatigue, alcohol use, injuries or medical conditions can all affect the necessary level of fitness for a particular task or duty (CCOHS, 2023).

Could It Be a Medical Condition?

According to Casey Clements, an emergency medicine physician at Mayo Clinic, it is possible for some clinical conditions to mimic intoxication:

One of the first signs of severe head injury is agitation or confusion. It can be hard to weed out if it's drugs, alcohol or related to head injury, or if it's related to another condition outside of the trauma or some combination



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of these factors. Kidney disease, metabolic disease or low sodium—these can give a mixed picture of trauma, medical abnormality and substance-related impairment. (Mayo Clinic, 2022)

A training presentation from the San Diego County Sheriff's Department (2016) details medical conditions and injuries that may appear to mimic impairment by alcohol or other drugs. The presentation reviews conditions such as head trauma, stroke, shock and multiple sclerosis.

If an injury is involved or reasonably suspected and the associate is displaying signs of impairment, it might be best to call 9-1-1 to rule out serious injury.

Conclusion

When it comes to impairment, the first question to ask is not, "Is this worker on drugs?" Rather, it should be, "Is this person in a condition to safely work?" Keeping the individual safe, along with those working around them, is the ultimate goal. Medical help or drug testing simply assist in identifying the problem.

When not an emergency situation, testing is simply part of the process of gathering information to determine what is happening. Once that is known, contact human resources if needed and follow the appropriate company procedures for the situation. **PSJ**

References

Canadian Center for Occupational Health and Safety (CCOHS). (2023). Impairment at work. <https://bit.ly/3SSdGP0>

Canadian Human Rights Commission. (2017). Impaired at work: A guide to accommodating substance dependence. <https://bit.ly/3YM86Bw>

CDC. (2024a). About heart attack symptoms, risk, and recovery. <https://bit.ly/3X3QcZH>

CDC. (2024b). Signs and symptoms of stroke. www.cdc.gov/stroke/signs-symptoms

Federal Motor Carrier Safety Administration (FMCSA). (2023). Reasonable suspicion testing (49 CFR 382.307). <https://bit.ly/3YJoKS2>

Mayo Clinic. (2022, Feb. 5). The impaired trauma patient: Separating intoxication from medical condition. <https://mayoclinic.org/3YKQh5D>

Quest Diagnostics. (2023). Drug testing index 2022. Quest diagnostics drug testing index: Full year 2022 tables. <https://bit.ly/3YJoVnc>

San Diego County Sheriff's Department. (2016). Medical conditions which may mimic drug impairment. <https://bit.ly/3X3ohc5>

Stroer, C. (2021, Feb. 22). All types of impairment can create safety risks: Expanding the scope of impairment in the workplace. National Safety Council. (2021). <https://bit.ly/3X52ZLi>

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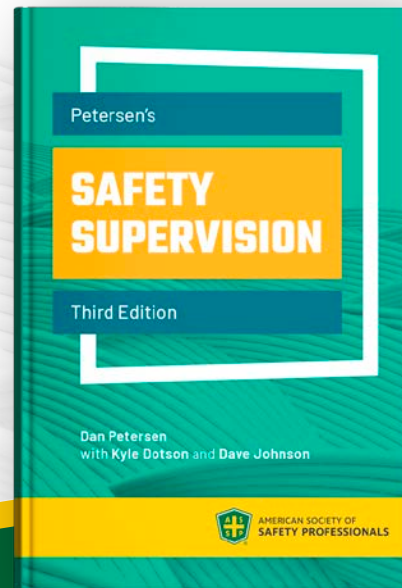
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