

# **Policy for Random Urine Drug Testing of Cathedral Preparatory School and Villa Maria Academy Students**

## **OVERVIEW**

The procedure for random drug testing of students is accomplished in conjunction with an independent drug testing Vendor selected by Cathedral Prep and Villa Maria. The Vendor is provided by the Assistant Principal a list of eligible students and in turn randomly selects up to 25% of these students for drug testing at regular intervals. The Vendor will send qualified collectors to the school who will oversee the collection of all specimens as outlined in this document. The Vendor will provide Medical Review Officer (MRO) services for interpretation and verification of results. Results are reported to the Assistant Principal by the MRO. Specimens are split into two vials upon collection.

### **1. A STATEMENT OF NEED AND PURPOSE**

Recognizing that use of alcohol and illicit drugs by students is a national problem and with the support from the U.S. Supreme Court, Cathedral Preparatory School and Villa Maria Academy will put a program of deterrence into effect, as a pro-active approach to a truly safe and drug free school. Students using illegal drugs pose a threat to their own health and safety, as well as to that of other students.

The purpose of this program is fourfold: (1) to provide for the health and safety of all Students; (2) to undermine the effects of peer pressure by providing a legitimate reason for Students to refuse to use illegal drugs; (3) to encourage students who use drugs to participate in drug treatment programs; and (4) to prevent the impact drug and alcohol use has on the learning centers of the brain allowing students to achieve their full academic potential while a student within Cathedral Preparatory School or Villa Maria Academy. The program is legally non-punitive for a first offense. It is designed to create a safe, drug free, environment for students and assist them in getting help when needed.

### **2. DEFINITIONS**

**Vendor** - The medical office or company selected by Cathedral Preparatory School and Villa Maria Academy to carry out the policy and procedure.

**Assistant Principal** - The school official who oversees the drug testing program in policy and procedure.

**Medical Review Officer (MRO)** - A licensed physician trained and certified in the process and interpretation of drug testing results.

**Illicit substance** - A drug classified by the Drug Enforcement Administration (DEA) as being available only by prescription from a physician or classified as being controlled and having no therapeutic use.

**Banned Substance** - A substance as contained in this policy as being banned from use by students.

**SAMHSA** - The Substance Abuse and Mental Health Services Administration; a governmental agency that certifies toxicology laboratories that perform drug testing following strict guidelines and constant quality assurance programs.

**GC/MS** - Gas Chromatography/Mass Spectroscopy; a scientific process to identify specific chemical compounds. A molecular fingerprint is obtained that identifies a chemical compound with 100% accuracy.

**Quantitative Levels** - The measurement levels of specific chemicals in the urine reported usually in nanograms per milliliter (ng/ml).

**Chain-of-Custody Form** - A preprinted form provided by the testing laboratory that records all contact with the provided specimen. The form is initiated by the collector and donor then follows with the specimen until the results are certified by the testing scientist and forwarded to the MRO for final certification.

**Adulterant/Adulteration** – Any attempt to alter the outcome of a urine drug test by adding a substance to the sample, attempting to switch the sample, or otherwise interfere with the detection of illicit or banned substances in the urine, or purposefully over-hydrating oneself in an attempt to dilute the urine to decrease possible detection of illicit or banned substances.

### **3. PROCEDURES FOR STUDENTS**

#### **a. Informed Consent for Testing**

At the beginning of each year, students and parent/guardian/custodian will complete and sign the **Cathedral Prep and Villa Maria Handbook/ Policy Acceptance Statement and Informed Consent Agreement for Random Drug Testing (Exhibit A)**. Failure to do so will bar the student from attendance at Cathedral Prep or Villa Maria Academy.

#### **b. Urine Drug Testing Frequency**

At the option of Cathedral Preparatory School and Villa Maria Academy at the beginning of each year or when a student transfers into Cathedral Preparatory School or Villa Maria Academy, all students may be subject to urine testing for illicit or

banned substances as specified in Paragraph 9 below. Up to 25% of students may be randomly tested on up to a bi-weekly basis anytime during the academic year.

**c. Sample Collection**

Samples will be collected as outlined under Vendor Requirements, Paragraph 6 below. Any student selected randomly for urine drug testing who is not in school on the day of testing will be tested at the next available testing time. Arrangements may be made for special collections at a Vendor Collection site with prior approval of the Assistant Principal.

**4. CONFIDENTIALITY OF RESULTS**

All drug test results are considered confidential information and will be handled accordingly. Those persons having results reported to them as set forth by this Policy must sign a Confidentiality Statement (**Exhibit B**) and are listed as follows: President, Principal, Assistant Principal, and Guidance Counselor.

**5. VENDOR REQUIREMENTS**

At a minimum, the Vendor must be able to provide the following services:

**a. Random Selection of Students**

Once provided a list of eligible students, the Vendor must select the required number of students in a random and confidential manner. Up to bi-weekly, the Vendor will arrange with the Assistant Principal, a day and time for the collection of specimens. The schedule will not follow any recognizable pattern. The selected student names will be given to the Assistant Principal, who will arrange for those students to report to the collection area.

**b. Collection of Urine Specimens**

The Vendor will oversee the collection of urine specimens as outlined in the **Procedures for Random Urine Drug Testing of Cathedral Preparatory School Students**. Chain of Custody forms will be provided by The Vendor that meet the criteria of this Policy and that of the testing laboratory. Students will be given as much privacy as possible in the obtaining of the specimen (see Collection Process).

**c. Testing of Urine Specimens**

The Vendor will have all specimens tested for the specified illicit or banned substances by a qualified laboratory certified by the **Substance Abuse and Mental Health Services Administration (SAMHSA)** following the guidelines of the

**Department of Health and Human Services (HHS).** The testing laboratory should have greater than 10 years experience in toxicology testing and chain-of-custody procedures. All specimens must be initially tested using a highly accurate immuno-assay technique, with all presumptive positive results then confirmed by a **Gas Chromatography/Mass Spectroscopy (GC/MS)** confirmatory test (understanding that no current GC/MS test is available for LSD).

The testing laboratory must be able to test for the following drug classes, substances or their metabolites in collected urine specimens. The Assistant Principal may specify specific classes or substances to be tested.

Alcohol	Amphetamines	Anabolic Steroids
Barbiturates	Benzodiazepines	Cocaine Metabolites
LSD	Marijuana Metabolites	Methadone
MDMA (Ecstasy)	Nicotine	Opiates
Phencyclidine	Propoxyphene	

**d. Medical Review Officer (MRO) Services**

The Vendor will provide MRO services by a licensed physician who is certified by the **Medical Review Officer Certification Council (MROCC)** or the **American Association of Medical Review Officers** as having proven by examination to have had the appropriate medical training to interpret and evaluate drug test results and thus qualified for certification as a Medical Review Officer. Additionally the MRO must demonstrate a willingness to abide by the **Procedure for Random Urine Drug Testing of Cathedral Preparatory School and Villa Maria Academy Students** as to the evaluation of positive drug tests and reporting findings to the Assistant Principal in a timely and confidential manner. All results will be kept on file for as long as the student is in high school.

**e. Reporting of Random Urine Test Results by Vendor**

The MRO will certify all urine drug screens as negative or positive and report by telephone positive findings in a confidential manner to the parent and then the Assistant Principal.

**f. Statistical Reporting and Confidentiality of Urine Drug Test Results**

The Vendor, testing laboratory, or MRO may not release any statistics on the rate of positive drug tests to any person, organization, news publication or media without expressed written consent of Cathedral Preparatory School or Villa Maria Academy. However, the Vendor will provide the Building Principal with an annual report showing the number of tests performed, rate of positive and negative tests,

and what substances were found in the positive urine specimens.

## 6. PROCEDURES IN THE EVENT OF A POSITIVE RESULT

a. Whenever a student's test result is ruled positive for the presence of illegal drugs, banned substances, or adulteration, the following will occur:

- (1) The Medical Review Officer will notify the parent and then the Assistant Principal. The Assistant Principal will then follow-up with the parent.
- (2) The student will be notified and is subject to the procedures below (**point b and point c**).
- (3) If the parent/guardian/custodian or student wish to contest the results, the Vendor will arrange for the split portion of the specimen to be submitted to another laboratory approved by Cathedral Preparatory School and Villa Maria Academy for testing. This is done at parent/guardian/custodian or student expense. Such a request must be made to the Assistant Principal in writing within five working days from first notification of positive test results.
- (4) The MRO may use quantitative results to determine if positive results on repeat testing indicate recent use of illicit or banned substances or the natural decline of levels of the illicit or banned substance from the body. If the MRO feels the quantitative levels determined to be above the established cutoffs do not reflect current use but natural decay, then a negative result may be reported.

b. First Positive Result

A positive ruling by the MRO, refusal, or adulteration will constitute a first positive. The Assistant Principal will notify the parents and student of his obligation to participate in a drug and alcohol assistance program which will begin with an assessment by a Drug and Alcohol Professional. The student will be given the option of participation in a drug assistance program of the parent's/ guardian's choosing (licensed drug and alcohol counselor) or enrollment in the Student Assistance Program. If an outside professional is chosen a Release of Information form must be signed by the student and parents for the school to communicate with the counselor. The student is mandated to comply with all recommendations made regarding assessment, treatment, and follow-up by the Drug and Alcohol Professional. At the school's discretion submission to monthly drug screens may be required for the remainder of the school year at parent expense under the Handbook provisions as explained below. Results of monthly drug screens must be given to Assistant Principal by the specified time each month. As per Cathedral Preparatory School and Villa Maria Academy Drug and Alcohol Policy:

“If a student warrants urinalysis testing, the student will have a maximum of **forty-five (45)**

**days from the first testing date to provide results that demonstrate he is free of any illicit substance use.** All urinalysis testing must show quantitative levels and be provided to the Assistant Principal within the timeframe specified. The student must demonstrate evidence of declining measurable levels of chemical influence from the first collection through all subsequent collections. If the student fails to follow the correct testing procedure or produces a diluted or adulterated test result, the test will be considered positive for an illicit substance.”

c. **Second Positive Result**

A second positive result, refusal, or adulteration in the same school year or any two consecutive calendar years will result in expulsion with no possibility for re-admittance.

**7. NON-PUNITIVE NATURE OF POLICY**

There are no punitive consequences for a first positive result (i.e. demerits, detention, etc.). once a student completes the drug and alcohol assistance program there is no further action required. However, a second positive result in the same school year, two consecutive calendar years, or while a student is enrolled I a drug or alcohol assistance program demonstrates an extreme unwillingness to comply with the goals of Cathedral Prep and Villa Maria to provide a safe and positive environment for all its students. Therefore, a student with a second positive result under those provisions will be expelled with no possibility for re-admittance.

Information regarding the results of drug tests will not be disclosed to criminal or juvenile authorities unless Cathedral Preparatory School or Villa Maria Academy is compelled by a valid and binding subpoena or other legal process. In the event of service of any such subpoena or legal process, the student and the student’s custodial parent, legal guardian, or custodian will be notified at least 72 hours before response is made by Cathedral Preparatory School or Villa Maria Academy, to the extent permitted by such subpoena or legal process.

**8. ILLICIT OR BANNED SUBSTANCES**

For the purpose of this Policy, the following drug classes, substances or their metabolites that can be tested for are considered illicit or banned for Cathedral Preparatory School and Villa Maria Academy Students:

Alcohol	Amphetamines	Anabolic Steroids
Barbiturates	Benzodiazepines	Cocaine Metabolites
LSD	Marijuana Metabolites	Methadone
MDMA (Ecstasy)	Nicotine	Opiates
Phencyclidine	Propoxyphene	

END OF POLICY

## **Procedures for Random Urine Drug Testing of Cathedral Preparatory School and Villa Maria Academy Students**

### **1. LIST OF STUDENTS**

The Assistant Principal will prepare a list of the entire student body. This list will be forwarded to the Vendor for the random selection of students who will submit urine specimens for testing.

### **2. RANDOM SELECTION OF STUDENTS FOR TESTING**

The Vendor will use a system to assure that students are selected in a random fashion. This system will utilize a computer based system designed specifically for the purpose of randomly selecting individuals for drug testing.

### **3. SCHEDULING OF URINE DRUG TESTING**

Urine drug testing is unannounced. The day and date are selected by the School Administration and confirmed with the Vendor. Random testing may be done up to a bi-weekly basis.

### **4. PRE-ENROLLMENT TESTING**

At the option of Cathedral Preparatory School and Villa Maria Academy at the beginning of each academic year, all students may be subject to urine drug testing. This testing will be accomplished prior to the first day of school on a date and time coordinated with the testing Vendor. The Assistant Principal is responsible for seeing that all students and their parent/guardian/custodian properly sign the **Informed Consent Agreement (Policy Exhibit A)** prior to testing.

### **5. FORM COMPLETION**

The Vendor is responsible for seeing that proper drug testing custody and control forms are used that satisfy the needs of the **Policy for Random Urine Drug Testing of Cathedral Preparatory School Students** and the testing laboratory. A student number will be used for identification with the student's name only appearing on the copies that go to the donor, MRO, and School Official.

### **6. COLLECTION PROCESS**

Selected students are escorted from class to the collection site. A specimen of urine is collected following this process:

- a. No purses, bags or containers may be taken into the collection area with the student. All extra coats, vests, jackets, sweaters, etc., are to be removed before entering the collection area.
- b. The collector adds a blueing agent to the water in the urinal or toilet.
- c. Student is asked to rinse their hands with water and dry them. If no water is easily accessible, a non-alcoholic wipe may be used instead.
- d. The drug testing custody and control form is completed by the Student and collector.
- e. The student is told to urinate directly into the provided container and should provide a sufficient amount of urine (45 ml) in one attempt. The student is also told that, upon completion, they are to hand the container of urine to the collector.
- f. The student steps up to the urinal or enters the stall to collect the specimen, then upon completion, hands the container to the collector.
- g. The collector checks the volume, reads and records the temperature within four minutes of collection, and looks for evidence of tampering.  
If tampering is suspected, a second specimen will be requested. A second suspected tampered specimen will be considered *refusal to test* and the Assistant Principal notified.
- h. With the student watching, the collector will pour the specimen into the two bottles and recap the specimen bottles tightly.
- i. The collector takes the properly signed and initialed bottle seals, verifies them with the donor, and places them over the caps and sides of the bottles.
- j. The sealed bottles are placed inside the transport bag
- k. The top lab copy of the drug testing custody and control form is folded with the top portion visible to the outside and placed in the Requisition Pouch. The transport bag and pouch are sealed as indicated. The student is given the donor copy of the form.
- l. The Student may wash their hands and is then sent back to class.
- m. The collector distributes the remaining copies of the form as required, being responsible for getting the appropriate copy of the form to the MRO in a timely manner.
- n. The Assistant Principal will be notified immediately of any student who refuses to give a urine sample.

## 7. MEDICAL REVIEW OFFICER (MRO) RESPONSIBILITIES

The MRO will review all results of urine drug testing. Any urine specimen testing positive for illicit or banned substances will be handled in the following manner:

- a. The MRO determines if any discrepancies have occurred in the **Chain of Custody**.
- b. Depending on the substances found in the urine, if necessary the MRO will contact the parent/guardian/custodian to determine if the student is on any prescribed medication from a physician.
- c. If the student is on medication, the parent/guardian/custodian will be asked to obtain a letter from the prescribing physician or photo copy of the original prescription, within five working days, to document what medications the student is currently taking.

- Failure to provide such requested information will be considered a positive result.
- d. The MRO will then determine if any of the prescribed medications resulted in the positive drug screen.
  - e. Finally, the MRO, based on the information given, will certify the drug test results as positive or negative and report this to the Assistant Principal, initially reporting positive results by phone.
    - (1) For example, a drug screen positive for codeine may be ruled negative by the MRO when he receives a letter from the treating physician that the student has been prescribed Tylenol© with codeine as a pain medication following tooth extraction. The absence of such a letter would constitute a positive result.
    - (2) Drug screens positive for illicit drugs (marijuana, heroin, cocaine, etc.) would automatically be considered positive by the MRO.
  - f. The MRO may use quantitative results to determine if positive results on repeat tests indicate recent use of illicit or banned substances or the natural decline of levels of the illicit or banned substance from the body. If the MRO feels the quantitative levels determined to be above the established cutoffs do not reflect current use but natural decay, then a negative results may be reported.

## 8. PICK-UP PROCESS

The Vendor is responsible for seeing that specimens are delivered to or picked up by the testing laboratory and the Chain of Custody form properly annotated.

## 9. PROCEDURES IN THE EVENT OF A POSITIVE RESULT

- a. Whenever a student's test result is ruled positive for the presence of illegal drugs, banned substances, or adulteration, the following will occur:
  - (1) The Medical Review Officer will notify the parent and then the Assistant Principal. The Assistant Principal will then follow-up with the parent.
  - (2) The student will be notified and is subject to the procedures below (**point b and point c**).
  - (3) If the parent/guardian/custodian or student wish to contest the results, the Vendor will arrange for the split portion of the specimen to be submitted to another laboratory approved by Cathedral Preparatory School or Villa Maria Academy for testing. This is done at parent/guardian/custodian or student expense. Such a request must be made to the Assistant Principal in writing within five working days from first notification of positive test results.
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b. First Positive Result

A positive ruling by the MRO, refusal, or adulteration will constitute a first positive. The Assistant Principal will notify the parents and student of his obligation to participate in a drug and alcohol assistance program which will begin with an assessment by a Drug and Alcohol Professional. The student will be given the option of participation in a drug assistance program of the parent's/ guardian's choosing (licensed drug and alcohol counselor) or enrollment in the Student Assistance Program. If an outside professional is chosen a Release of Information form must be signed by the student and parents for the school to communicate with the counselor. The student is mandated to comply with all recommendations made regarding assessment, treatment, and follow-up by the Drug and Alcohol Professional. At the school's discretion submission to monthly drug screens may be required for the remainder of the school year at parent expense under the Handbook provisions as explained below. Results of monthly drug screens must be given to Assistant Principal by the specified time each month. As per Cathedral Preparatory School and Villa Maria Academy Drug and Alcohol Policy:

“If a student warrants urinalysis testing, the student will have a maximum of **forty-five (45) days from the first testing date to provide results that demonstrate he is free of any illicit substance use**. All urinalysis testing must show quantitative levels and be provided to the Assistant Principal within the timeframe specified. The student must demonstrate evidence of declining measurable levels of chemical influence from the first collection through all subsequent collections. If the student fails to follow the correct testing procedure or produces a diluted or adulterated test result, the test will be considered positive for an illicit substance.”

c. Second Positive Result

A second positive result, refusal, or adulteration in the same year or any two consecutive calendar years will result in expulsion with no possibility for re-admittance.

## 10. NON-PUNITIVE NATURE OF POLICY

There are no punitive consequences for a first positive result (i.e. demerits, detention, etc.). once a student completes the drug and alcohol assistance program there is no further action required. However, a second positive result in the same school year, two consecutive calendar years, or while a student is enrolled in a drug or alcohol assistance program demonstrates an extreme unwillingness to comply with the goals of Cathedral Prep and Villa Maria to provide a safe and positive environment for all its students. Therefore, a student with a second positive result under those provisions will be expelled with no possibility for re-admittance.

Information regarding the results of drug tests will not be disclosed to criminal or juvenile authorities unless Cathedral Preparatory School or Villa Maria Academy is compelled by a valid and binding subpoena or other legal process. In the event of service of any such subpoena or legal process, the student and the student's custodial parent, legal guardian, or custodian will be notified at least 72 hours before response is made by Cathedral Preparatory School or Villa Maria Academy, to the extent permitted by such subpoena or legal process.

END OF PROCEDURE

EXHIBIT A

Page 1

**Cathedral Preparatory School and Villa Maria Academy  
Handbook/ Policy Acceptance Statement and Informed Consent Agreement for Random Drug Testing**

**This statement must be signed and returned by the student and their parent/ guardian/ custodian for the student to be eligible to attend Cathedral Prep or Villa Maria.**

Student Name \_\_\_\_\_  
(Please Print)

Grade \_\_\_\_\_

**AS A STUDENT:**

- I understand and agree that enrollment at Cathedral Preparatory School or Villa Maria Academy is a privilege that may be withdrawn for activities contrary to our Philosophy, Goals, and Code of Conduct.
- I have read the appropriate Handbook, policies referenced thereto and including the Random Urine Drug Testing Policy, and recognize my responsibility to ascribe to and support them, even if I may disagree with them.
- I understand that when I enroll at Cathedral Preparatory School or Villa Maria Academy, I may be subjected to urine drug testing, and if I refuse, will be subject to the terms of the policy. I have read the consent on the reverse of this form and agree to its terms.
- I understand this is binding while a student within Cathedral Preparatory School or Villa Maria Academy.

\_\_\_\_\_  
Student Signature

Date \_\_\_\_\_

**AS A PARENT/GUARDIAN/CUSTODIAN:**

- I have read the appropriate Handbook, policies referenced thereto and including the Random Urine Drug Testing Policy, and recognize my child's responsibility to ascribe to and support them, even if he/she may disagree with them.
- I understand that my son/daughter, when enrolled at Cathedral Preparatory School or Villa Maria Academy, may be subjected to random urine drug testing, and if he/she refuses, will be subject to the terms of the policy. I have read the consent on the reverse of this form and agree to its terms.
- I understand this is binding while my son/daughter is a student within Cathedral Preparatory School or Villa Maria Academy.

\_\_\_\_\_  
Parent/Guardian/Custodian Signature

Date \_\_\_\_\_

\_\_\_\_\_  
Parent/Guardian/Custodian Name (print)

\_\_\_\_\_  
Home Phone

\_\_\_\_\_  
Work Phone

EXHIBIT A (Back side)

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## **Consent to Perform Urinalysis for Drug Testing School Year 2011-2012**

We hereby consent to allow the student named on the front of this form to undergo urinalysis testing for the presence of illicit drugs or banned substances in accordance with the **Policy and Procedure for Random Urine Drug Testing of Cathedral Preparatory School and Villa Maria Academy Students** as approved by Cathedral Preparatory School and Villa Maria Academy.

We understand that the collection process will be overseen by a qualified vendor.

We understand that any urine samples will be sent only to a certified medical laboratory for actual testing, and that the samples will be coded to provide confidentiality.

We hereby give our consent to the medical vendor selected by Cathedral Preparatory School and Villa Maria Academy, their laboratory, doctors, employees, or agents, together with any clinic, hospital, or laboratory designated by the selected medical vendor to perform urinalysis testing for the detection of illicit drugs or banned substances.

We further give permission to the medical vendor selected by Cathedral Preparatory School and Villa Maria Academy, its doctors, employees, or agents, to release all results of these tests to the Medical Review Officer (MRO) working for the medical vendor. We understand these results will be forwarded to the Assistant Principal and will also be made available to us.

We understand that consent pursuant to this **Informed Consent Agreement** will, upon enrollment, be effective for the duration of the student's enrollment at Cathedral Preparatory School or Villa Maria Academy.

We hereby release Cathedral Preparatory School and Villa Maria Academy, the vendor and its

employees from any legal responsibility or liability for the release of such information and records.

EXHIBIT B

**Cathedral Preparatory School and Villa Maria Academy**

**Confidentiality Statement for Random Urine Drug Testing Program**

I, \_\_\_\_\_, acknowledge that I will be privileged to hear and see sensitive information related to results of random urine drug testing performed on students of Cathedral Preparatory School. I pledge to keep any information given to me in strict confidence, and will only release this information to others as dictated by Cathedral Preparatory School and Villa Maria academy or with properly obtained permission of the student and parent/guardian/custodian.

\_\_\_\_\_  
Signature Date