

Memo

To: Prospective FMC Employees

From: David Espeland, CEO

Date: July 15, 2009

Re: FMC Drug and Alcohol Policy

Fallon Medical Complex (FMC) is committed to providing a safe work environment, to assure each worker's fitness for duty, and to protect employees, patients and visitors from the effects of employee use of illegal and controlled drugs and alcohol while on duty. FMC shall require drug and alcohol screening of all prospective employees prior to beginning employment.

Screening shall consist of a urine test conducted on-site, producing results in a matter of minutes. Prospective employees shall be tested for illegal and controlled substances, such as those identified in Schedules I through V of Section 202 of the Controlled Substances Act such as, but is not limited to, marijuana, amphetamines, opiates, phencyclidine (PCP), and cocaine, as well as any drug not approved for medical use by the U.S. Drug Enforcement Administration or the U.S. Food and Drug Administration.

All applicants who are given a conditional offer of employment at FMC are required to submit to a drug screen and shall be notified as such when the conditional offer is presented. Pre-employment screenings shall be conducted no earlier than one week prior to an applicant's anticipated start date. All prospective employees shall present a photo ID at the time of time of testing and shall sign a statement agreeing to submit to the testing at the time the specimen is collected. A refusal to submit to the requested testing by FMC shall result in immediate disqualification from employment.

Applicants will be given an opportunity at the time of specimen collection to voluntarily disclose any prescription medications that may potentially result in a positive test reading. This disclosure shall include a written script from the treating physician or the pharmacy bottle with the prescription label intact. Applicants shall sign a statement granting FMC the right to call the treating physician or the dispensing pharmacist to verify the validity of the prescription.

If a voluntary disclosure is not offered by an applicant, FMC must receive a negative screen result prior to the applicant commencing employment. A positive drug screen shall immediately disqualify the applicant from employment with FMC for a period of no less than six months.

If a voluntary disclosure is offered and the applicant's drug screen tests positive, FMC shall attempt to verify the validity of the prescription and/or consult with a Medical Provider to determine if the positive test results were directly correlated with the use of the disclosed prescription medication. If, in the opinion of the provider they are correlated, employment at FMC may not be withheld. If the resulting opinion is otherwise, the applicant shall be immediately disqualified from employment with FMC for a period of no less than six months.