

PRESCRIPTION AND  
OVER-THE-COUNTER  
DRUG USE IN THE  
TRANSIT INDUSTRY

# FTA Disclaimer

The information contained in this presentation is based on information provided by the Food and Drug Administration, the Federal Aviation Administration, and the Federal Railroad Administration. The information provided should be used only as guidelines and **does not** constitute Federal Regulations. Sound medical knowledge and understanding of the pharmacological properties of the prescription and over-the-counter medications, and detailed knowledge of an employee's medical history and safety-sensitive job duties must guide the final assessment of potential risks to the public.

# Purpose of the RX/OTC Presentation

- PURPOSE IS

- Safety

- Guidelines

- Technical Assistance

- PURPOSE IS NOT

- Drug and Alcohol Testing

- Regulation

- A List of Approved/Not Approved Medications

# Overview

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- NTSB Directive and FTA Challenge
- Overview of the Issue
- Developing an Rx/OTC Policy
  - Elements
  - Roles and Responsibilities
- Establishing Medical Review Procedures
- Employee Rx/OTC training

# NTSB Directive

The National Transportation Safety Board has issued a directive to the FTA to educate transit systems on the potential safety risks associated with the use of Prescription and Over-The-Counter medication by employees who perform safety-sensitive duties.

# NTSB Directive (Cont.)

The NTSB recommended that all transit systems inform employees in safety-sensitive positions to inform the system about the employee's use of prescription and OTC medications so that the system can have qualified medical personnel determine the medicines potential effects or employee performance, and train employees about their responsibility under policy.

# FTA Challenge

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The Federal Transit Administration issued a Dear Colleague letter (5/00) to all grant recipients encouraging them to educate transit operators about the risks associated with the use of prescription and over-the-counter medications.

# FTA Challenge (Cont.)

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Grantees were encouraged to:

- 1) Review current policies with regard to operators' use of over-the-counter and prescription medications which could result in public safety being jeopardized
- 2) Immediately institute educational programs that address the potential dangers of taking certain types of medications.

# Definitions (Rx)

- Prescription drugs (Rx) are medications which require written authorization for use by a healthcare professional whose license permits them to prescribe medication.
  - The prescription must include the patient's name, the name of the substance, quantity/amount to be dispensed, instructions on frequency and method of administration, refills, and date.

# Common Types of Rx Medications

- Anti-inflammatory/Pain Medication
  - Relieves pain
- Antidepressants and Psychoactive Medication
  - Relieves depression and other psychological conditions
- Antihistamines
  - Reduces allergy & cold symptoms – also used to treat insomnia

# Common Types of Rx Medications (Cont.)

- **Motion Sickness Medication**  
Relieves motion sickness
- **Muscle Relaxants**  
Relieves sore tight muscles
- **Steroids**  
Controls bodily functions

# Common Types of Rx Medications (Cont.)

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- Stimulants

Causes user to be more alert

- Tranquilizers & Sedatives

Relieves anxiety, stress & insomnia

# Definitions (OTC)

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- Over-The-Counter (OTC) medications are any legal, non-prescription substance taken for relief of discomforting symptoms.
  - May include capsules, powders, tablets, or liquids.

# Common Types of OTC

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- Pain relief/fever reducer
- Colds/Flu medication
- Appetite Suppressants
- Bowel Preparations
- Sleeping Aids
- Stimulants

# Cause for Concern

- Some side effects of Rx and OTC medications can be a safety issue when taken by safety-sensitive employees
- Can include:
  - Agitation
  - Anxiety
  - Blurred vision
  - Breathing difficulty
  - Chest pain
  - Chest tightness
  - Confusion
  - Dizziness
  - Disorientation
  - Double vision
  - Drowsiness
  - Emotional instability
  - False sense of well being
  - Fatigue

# Cause for Concern (Cont.)

- Fever
- Hallucinations
- Severe Headache
- Hyperventilation
- Insomnia
- Light headedness
- Muscle cramps/spasms
- Nausea/vomiting
- Nervousness
- Palpitations
- Poor coordination
- Rapid or irregular heart beat
- Restlessness
- Ringing in the ears
- Sedation
- Seizures
- Severe diarrhea
- Tremors
- Weakness

# FTA Recommended Policy Elements

- Purpose of Policy
  - Acknowledges risks associated with Rx/OTC use
  - Emphasizes safety
  - Balances the treatment of medical conditions and the requirements of performing safety-sensitive job duties
  - Not intended to force employees in need of medical attention to work or keep employees who are eligible to work off duty for receiving treatment of a medical condition.

# Suggested Elements of an Rx/OTC Policy

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- Define processes and procedures that implement the policy, such as:
  - Medical review/authorization
  - Reporting
  - Use of leave benefits; limitations

# Suggested Elements of an Rx/OTC Policy (Cont.)

- Define Consequences of Violating Specific Policy Provisions
  - Use of Rx/OTC that contribute to cause or increase the severity of an accident
  - Failure to report use
  - Failure to obtain medical authorization
  - Other policy provision violations

# Suggested Elements of an Rx/OTC Policy (Cont.)

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- Ensure that the policy emphasizes and maintains confidentiality
  - Records
  - Interaction with medical practitioner

# Suggested Elements of an Rx/OTC Policy (Cont.)

- Defined Roles and Responsibilities
  - Employees
  - Management/Supervisors
  - Medical Practitioner (Physician, Dentist, Physician's Assistant, Optometrist, Chiropractor, Other)
  - Pharmacist
  - Employer MRO/Physician

# Suggested Management/ Supervisor Responsibilities

- Establish policy and procedures
  - Determine content/process for medical review.
  - Define employer notification process.
  - Determine process for employer physician/MRO review.
- Institute employee Rx/OTC awareness and training program
- Establish consequences for policy violation

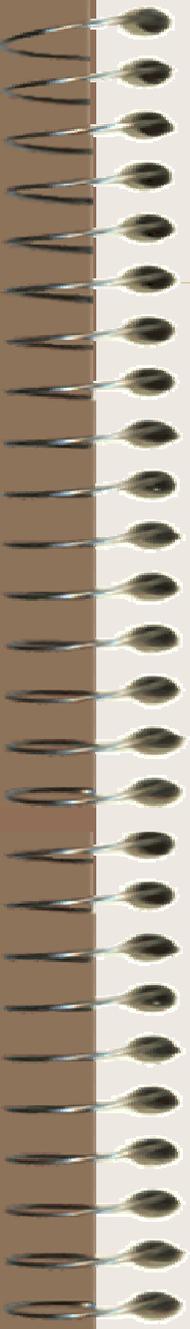
# Suggested Management/ Supervisor Responsibilities (Cont.)

- Establish record keeping, information disclosure and confidentiality protection procedures.
- Based on medical review, determine if employee is authorized to perform safety-sensitive duties.
- Establish procedures for removing employees from duty.

# Suggested Management/ Supervisor Responsibilities (Cont.)

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- Incorporate into absenteeism policy.
  - Type of leave
  - Limitations on leave
- Use Rx/OTC program as a method for improving employee and public safety.



# Suggested Employee Roles and Responsibilities

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- Be aware of medical condition and implications for job
- Be aware of possible Rx/OTC side effects which may compromise safety
- Read warning labels/side effects
  - Rx labels and warnings
  - Pharmacy information summaries
  - OTC Labels
  - OTC Package inserts



# Suggested Employee Roles and Responsibilities (Cont.)

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## **How to Read a Label**

- Generic or Brand name
- Purpose
- Proper use (indications/contraindications)
- Instructions
- Warnings/Precautions
- Side effects/adverse reactions
- Expiration date
- Other information/storage

# Suggested Employee Roles and Responsibilities (Cont.)

- Discuss Rx or OTC with prescribing/medical practitioner or pharmacist.
  - Dosage
  - Frequency
  - Method of use (capsule, liquid, suppository)
  - Possible side effects
  - Interaction with other medications
  - Impact on other medical condition

# Suggested Employee Roles and Responsibilities (Cont.)

- Inform medical practitioner of:
  - Safety-sensitive job duties
  - Other Rx, OTC, vitamins, herbal remedies, dietary supplements
  - Medical history
  - Previous experience with Rx/OTCs
  - Medical treatment and prescriptions given by other medical practitioners

# Suggested Employee Roles and Responsibilities (Cont.)

- Questions for medical practitioner:
  - Inquire into alternative dosage schedules that minimize impact on work performance (i.e., dose at end of shift rather than before)
  - Inquire into alternative treatment options that do not jeopardize safety

# Suggested Employee Roles and Responsibilities (Cont.)

- When ill or injured obtain appropriate medical treatment
- Only use medications for their intended purpose
- Check the strength of the medication
- Keep your medical practitioner informed of your reaction to Rx/OTC
- Always take medication as directed

# Employee Warnings

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- Do not take larger doses than prescribed
- Do not take longer than prescribed
- Do not double dosage after missing a dose
- Do not self-medicate with OTC or someone else's Rx in lieu of obtaining medical treatment

# Employee Warnings (Cont.)

- Do not use an expired prescription
- Do not stop taking medication because you begin to feel better – take for length prescribed
- Do not take for granted that a prescription is correct. Always read the label every time you get it filled. Make sure you have the right medication at the proper dosage.

# Employee Warnings (Cont.)

- Never combine medications in the same bottle
- Never store in humid locations (bathroom)
- Make sure you understand the directions
- Ask questions if you don't understand or the prescription doesn't seem right
- Use the same pharmacy
- Always ask about interactions
- Keep medication in original labeled bottle

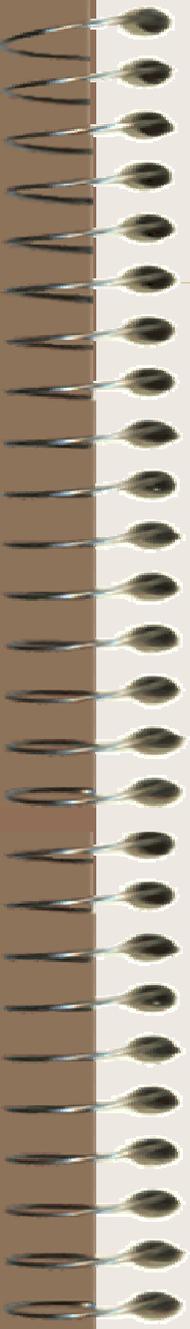
# Employee Warnings (Cont.)

- Individual often can not judge level of own impairment
- Side effects may change/intensify/lessen with prolonged use
- Some medications should be taken with food to minimize adverse reaction while other should be taken on an empty stomach

# Employee Warnings (Cont.)

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- Changing dosage schedule (without medical practitioner approval) can alter effect
- Monitor your reaction to the Rx/OTC
- Do not perform safety sensitive duty if impaired



# Prescribing Physician/Medical Practitioner Responsibility

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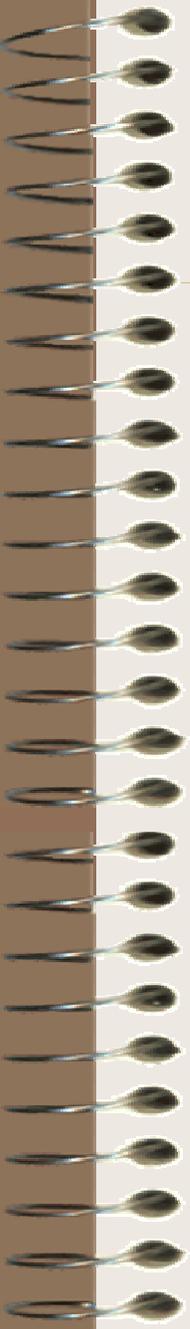
- Understand responsibility to protect public safety
- Be aware of nature of safety-sensitive job duties
- Consider medical history
- Consider other Rx, OTC, vitamins, herbal supplements

# Prescribing Physician/Medical Practitioner Responsibility (Cont.)

- Consider current illness/injury in concert with Rx when assessing employee's ability to safely perform job duties
- Discuss medical condition, Rx dosage, frequency, side effects and possible interactions with patients
- Consider alternative treatment options that will not jeopardize public safety
- Consider alternative dosing schedule

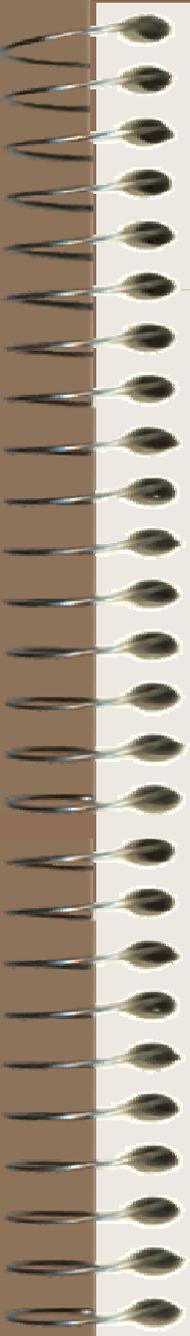
# Prescribing Physician/Medical Practitioner Responsibility (Cont.)

- Do not authorize return to safety-sensitive duties if medication use poses safety risk
- Discuss assessment with employee – if employee provides consent- discuss determination with employer
- Cooperate with employer physician/MRO evaluation process



# Suggested Employer Physician/MRO Responsibilities

- Provide information on Rx/OTC hazards
- Serve as resource by responding to questions
- Review prescribing medical practitioner authorization and make final determination as appropriate
- Consult with prescribing medical practitioners as needed



# Three Medical Review Procedural Models

# Medical Review Procedural Model 1

- Employee Responsibility
  - Employee asks about side effects and potential impact on ability to perform duties
  - Employee monitors reaction to Rx/OTC
    - Assumes employee can judge own level of impairment – may not be true
  - Employee requests leave if impaired
    - May or may not get statement from doctor

# Medical Review Procedural Model 2

- Medical Authorization
  - Employee obtains medical authorization form from employer
  - Employee asks about side effects and potential impact on ability to perform duties
    - If no adverse impacts – Medical practitioner signs release indicating employee may perform duty
    - If adverse impacts – Medical practitioner signs indicating employee must be off of duty for a specified amount of time

# Medical Review Procedural Model 2 (Cont.)

- Medical Authorization (cont.)
  - Employer may or may not keep form for documentation
  - Form may be reviewed by the employer's Physician/MRO
    - After discussing with prescribing physician, may overturn authorization

# Medical Review Procedural Model 3

- List of medications
  - Employer provides list of medications to employee or medical practitioner
    - Approved for use, no authorization required
    - Required medical authorization
    - Not approved for use
  - Employee compares Rx to list. Attempts to find alternates if Rx not approved or requiring medical authorization.
  - No alternate available – requests authorization from Medical practitioner

# Suggested Employee Awareness Training

- Introduction
  - Purpose of Rx/OTC policy
    - Balance treatment of medical condition with safe performance of job duties
  - Applicability – Safety-sensitive employees or all employees
  - Employee responsibility for treatment and safe performance of duties

# Suggested Employee Awareness Training (Cont.)

- Training Elements
  - An overview of your system's Rx/OTC policy
  - An overview of your system's procedures
    - Medical authorization
    - Notification/reporting
    - Forms if applicable
  - Consequences of policy violations
  - Leave policy
    - Sick leave/paid time off
    - Limitations on use

# Suggested Employee Awareness Training

- Training Elements
  - Risks associated with Rx/OTC use
  - Definition of Rx and OTC
  - How to read a label
  - How to read Rx information sheets
  - Side effects of concern
  - Common sense rules for taking medication

# Suggested Employee Awareness Training (Cont.)

- Training Elements (cont.)
  - Medication list if applicable
    - Approved medications
    - Medications which require authorization
    - Medications not approved for use
- Conclude Training
  - Questions and answers
  - Re-emphasize safety

# Suggested Employee Awareness Training (Cont.)

- May conduct Rx/OTC training as a stand-alone training course or as one element of the regular drug and alcohol awareness training
- Always have resource material available
  - If possible have medical practitioner involved in training and/or available for questions
  - Posts on bulletin boards.
  - Hotlines/Nurse help-lines
  - Determine who employees may call for questions.
    - MRO
    - Other medical practitioner

# Summary

- The primary objective of developing and implementing a Prescription/OTC policy and training employees, is to enhance the safety of employees, customers, and the public.
- Employees must accept responsibility for their own medical treatment. They must also accept responsibility for protecting the public safety.

# Relevant Web Sites

- Aviation Medicine – [www.aviationmedicine.com/meds.htm](http://www.aviationmedicine.com/meds.htm)
- Food & Drug Administration – [www.fda.gov](http://www.fda.gov)
- FDA Center for Drug Evaluation and Research – [www.fda.gov/cder/](http://www.fda.gov/cder/)
- Agency for Healthcare Research and Quality – [www.ahrq.gov](http://www.ahrq.gov)
- U.S. Dept. of Health and Human Services – [www.hhs.gov](http://www.hhs.gov)
- National Health Info Center – [www.health.gov/nhic](http://www.health.gov/nhic)
- The Internet Drug List – [www.rxlist.com](http://www.rxlist.com)