



Health Professionals' Services Program Program Guidelines

Title: Completion of the Health Professionals' Services Program

Pages: 3

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Guideline:

1 In order for a licensee to successfully complete the Health Professionals' Services Program (HPSP), the
2 licensee must:

- 3 1) Complete the required number of years of participation, as indicated on the Addendum to the
4 Monitoring Agreement.
- 5 2) Comply continuously with their monitoring agreement and monitoring agreement addendums
6 for at least two years.

7 **"Comply continuously"** means to have been:

- 8 (a) Enrolled in the program for at least two uninterrupted years without any reports of substantial
9 non-compliance involving significant violations of the monitoring agreement and
- 10 (b) Deemed by the licensee's board to have otherwise successfully complied with all terms of the
11 monitoring agreement.

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13 **Substantial non-compliance** is defined in rules governing the Health Professionals' Services Program (**ORS**
14 **676.185(5)(a-h)**).

15 Substantial non-compliance includes but is not limited to information that a licensee:

- 16 • Engaged in criminal behavior;
- 17 • Engaged in conduct that caused injury, death or harm to the public, including engaging in sexual
18 impropriety with a patient;
- 19 • Was impaired in a health care setting in the course of the licensee's employment;
- 20 • Received a positive toxicology test result as determined by federal regulations pertaining to drug
21 testing;
- 22 • Violated a restriction on the licensee's practice imposed by the program or the licensee's board;
- 23 • Was civilly committed for mental illness;
- 24 • Entered into a diversion agreement but failed to participate in the program; or
- 25 • Was referred to the program but failed to enroll in the program.

26 The process for completion differs for Board Referrals and Self Referrals.

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28 **Board Referrals (including self-referrals who are now known to the Board due to substantial non-**
29 **compliance or other circumstances):**

30 Each board has specified a time frame, between three and six months prior to the estimated completion date
31 on record, at which point they should receive a completion summary. The Agreement Monitor will prepare
32 this completion summary at the designated time frame, including relevant history related to the reason for
33 referral, compliance history with HPSP, treatment history, employment history, toxicology history, and any
34 other relevant information. The completion summary will be reviewed by the HPSP Medical Director or
35 Program Manager, depending on the licensing Board, and a recommendation will be made as to whether the
36 licensee is approved by HPSP to complete the program, or if the licensee should obtain a third-party
37 evaluation to determine eligibility for program completion. The completion summary and recommendation
38 for approval or third-party evaluation will be shared with the licensing board. The board provides final
39 approval for program completion, or recommendation for third-party evaluation. If the board does not
40 approve program completion, they provide a new estimated date of discharge.

41 If a licensee is approved by the board for completion, a final toxicology test will be scheduled no more than
42 five business days prior to the approved completion date. The final toxicology test must result negative prior
43 to program completion. Please reference the guideline “Toxicology Testing Exemptions” regarding testing in
44 the two weeks prior to completion. Furthermore, all outstanding monitoring requirements must be met and
45 documentation received prior to program completion.

46 On the approved completion date, if all monitoring requirements have been met and final toxicology test has
47 resulted negative, the Agreement Monitor and licensee will have a final meeting via phone or video
48 conference. The licensee will be asked to discuss their continuing wellness plan, which the Agreement
49 Monitor will document in the record. The Agreement Monitor will send a letter via postal mail to the licensee
50 verifying completion from HPSP and will submit a copy to the board. The Agreement Monitor will also send
51 completion letters as applicable to the licensee’s employer, other state monitoring programs, and
52 credentialing agencies to whom HPSP had been providing regular reports and for whom a release of
53 information is on file. If the approved date of completion falls on a Saturday, Sunday, or Uprise Health
54 observed holiday, program completion will be finalized on the next business day. If all monitoring
55 requirements have not been met on the approved completion date (including final toxicology test resulting
56 negative), program completion will occur no later than the following business day after all requirements are
57 met.

58 **Early Completion:** Any requests for program completion prior to the estimated date of completion (or if
59 there is no estimated date of completion) must be initiated by the licensee by sending a written request to
60 the licensing board. Each board has their own standards for if, and when, a request for early completion will
61 be considered.

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64 **Self-Referrals:**

65 The Agreement Monitor will prepare a completion summary three months prior to the estimated completion
66 date on record. This completion summary will include relevant history related to the reason for program
67 enrollment, compliance history with HPSP, treatment history, employment history, toxicology history, and
68 any other relevant information. The completion summary will be reviewed by the HPSP Medical Director or
69 Program Manager, depending on the licensing Board, and a decision will be made as to whether the licensee
70 is approved by HPSP to complete the program, or if the licensee should obtain a third-party evaluation to
71 determine eligibility for program completion. If HPSP does not approve program completion, a new
72 estimated date of discharge will be provided.

73 A final toxicology test will be scheduled no more than five business days prior to the approved completion
74 date. The final toxicology test must result negative prior to program completion. Please reference the
75 guideline “Toxicology Testing Exemptions” regarding testing in the two weeks prior to the completion date.
76 Furthermore, all outstanding monitoring requirements must be met and documentation received prior to
77 program completion.

78 On the approved completion date, if all monitoring requirements have been met and final toxicology test has
79 resulted negative, the Agreement Monitor and licensee will have a final meeting via phone or video
80 conference. The licensee will be asked to discuss their continuing wellness plan, which the Agreement
81 Monitor will document in the record. The Agreement Monitor will send a letter via postal mail to the licensee
82 verifying completion from HPSP. The Agreement Monitor will also send completion letters as applicable to
83 the licensee’s employer, other state monitoring programs, and credentialing agencies to whom HPSP had
84 been providing regular reports and for whom a release of information is on file. If the approved date of
85 completion falls on a Saturday, Sunday, or Uprise Health observed holiday, program completion will be
86 finalized on the next business day. If all monitoring requirements have not been met on the approved
87 completion date (including final toxicology test resulting negative), program completion will occur no later
88 than the following business day after all requirements are met.

89 **Early Completion:** The preference and expectation is for licensees to complete the full term of the
90 program, but HPSP understands that there are extenuating circumstances in which an early completion
91 may be appropriate. Any requests for program completion prior to the estimated date of completion (or if
92 there is no estimated date of completion) must be initiated by the licensee by sending a written request to
93 the Policy Advisory Committee (PAC). This request must include the specific and detailed reasons why the
94 licensee is requesting early completion, as well as the licensee’s continuous wellness plan. Requests may not
95 be submitted earlier than two years prior to the licensee’s estimated date of completion and may not be
96 submitted if the two years of continuous compliance requirement has not been met. If the request is denied,
97 PAC may provide a timeframe at which a new request could be submitted for consideration in the future.