



## Health Professionals' Services Program Program Guidelines

**Title: Completion of the Health Professionals' Services Program**

**Pages: 3**

**Revision Date: 10/26/2021; 5/15/2013; 2/15/2012**

### **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.

12  
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.

27

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.

62

63

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.