

Naloxone for Workplace Opioid Overdose Compliance Game Plan



Keeping a naloxone kit at your workplace can save lives—and ensure compliance if you're in Ontario.

The opioid crisis is having a devastating impact on Canadians, especially in the western and northern parts of the country. There were 19,355 opioid-related deaths in Canada between Jan. 2016 and Sept. 2020. The crisis has intensified even more during the COVID-19 pandemic. In BC alone, opioid deaths have topped 150 per month for 18 months in a row, reaching a record high of 209 in January 2022. Many opioid overdose deaths happen at work. What can a company do to guard against fatal overdoses in their own workplace? One answer is to implement a response plan for administering naloxone to victims. Here's an 11-step game plan you can use that may save lives in your workplace.

Opioid Hazards in the Workplace

Opioid drugs like fentanyl, oxycodone, morphine and hydromorphone, are prescribed to manage pain, including workplace injuries. Canada is among the highest opioid prescribing nations in the world, with nearly 1 in 8 people receiving a prescription for an opioid drug in 2018, according to the Canadian Institute for Health Information. While the brain and nerve stimulation impacts of opioid drugs block perception of pain, they also produce a buzz that impairs judgment and increases the risks of accidents and injuries. Opioids are also highly addictive.

Most opioid-related deaths are due to overdose, including at workplaces. While Canada doesn't keep such statistics, the Bureau of Labor Statistics reports that 388 of the 4,786 workplace deaths in the US in 2020 (8.1%) were due to unintentional overdose from nonmedical use of opioid and other drugs. Overdose deaths were particularly common in 3 industries:

- Construction;
- Transportation & Warehousing; and
- Healthcare & Social Assistance.

Naloxone in the Workplace

A drug called naloxone hydrochloride has proven effective in temporarily stopping the life-threatening effects of opioid overdoses by restoring breathing and reversing sedation and unconsciousness. Because it has few side effects, the benefits of using it to treat overdose greatly outweigh the risks. That's why police officers, emergency medical services providers and non-emergency professional responders carry the drug.

It's also why employers should consider implementing their own program to make naloxone available in the workplace in case of overdose. On June 1, 2023, new Ontario OHS regulations take effect requiring employers to keep a naloxone kit if they "become aware, or ought reasonably to be aware," of a risk of overdose at the workplace.

How to Create a Naloxone Program

Even if it's not required, keeping a naloxone kit at your workplace may save lives. But you need to implement proper policies and procedures. The National Institute of Occupational Safety and Health (NIOSH) recommends that employers take the following steps:

Step 1. Perform a Naloxone Assessment

Naloxone isn't just a first aid kit, fire extinguisher or other simple item that all workplaces must have. Because it requires special supplies and training, it's advisable only where there are significant risks of overdose. So, the first thing you must do—including in Ontario—is perform an assessment to determine whether you need a naloxone program at your site:

- Identify workers, clients, visitors and members of the public who are at risk of experiencing an overdose at your site;
- If your workers are likely to encounter overdoses at work, e.g., if your site is a medical or drug rehab clinic, identify which, if any, of your staff would be candidates to receive the training necessary to administer naloxone to an overdose victim; and
- Evaluate the potential consequences if naloxone weren't available considering factors like how far you are from a hospital or EMS.

Finally, assess likelihood and consequences the way you would with other hazards:

- **Likelihood High:** Naloxone needed;
- **Likelihood Low/Severity of Consequences High:** Naloxone may be needed and you should get advice from local emergency responders and medical professionals who treat opioid use disorders; and
- **Likelihood Low/Severity of Consequences Low:** Naloxone probably not needed.

Step 2. Assess Liability Issues

Unlike aspirin or other drugs you can buy over the counter in a drug store or supermarket, naloxone requires a prescription to distribute and administer. However, in recognition of its lifesaving potential for overdoses, Health Canada

has authorized use of naloxone without a prescription for emergency use for opioid overdose outside hospital settings. Even so, you need to jump through legal hoops to properly obtain the drug.

Step 3. Designate Naloxone Response Coordinator

You need a policy establishing protocols to ensure safe use of naloxone at your workplace. **Best Practice:** Appoint a qualified and properly trained person to serve as the workplace naloxone response coordinator with responsibility for:

- Collaborating with local partners to obtain naloxone legally, either directly or by prescription;
- Selecting workplace locations to store naloxone;
- Ensuring that naloxone kits are in ample supply, properly equipped and not past expiration date;
- Ensuring that authorized staff are adequately trained in overdose recognition, naloxone use and storage; and
- Maintaining required naloxone records and logs.

Step 4. Train Staff to Administer Naloxone

Even though Health Canada has authorized nonprescription use of naloxone for overdose emergencies, it still must be administered by a person with proper training. And because it must be administered immediately, that person(s) must be somebody on your own staff. (Note: This is spelled out in Bill 88.) According to NIOSH, such training should be provided at least once a year (plus refresher training as needed) and cover:

- Recognition of opioid overdose symptoms so staff can determine who may need naloxone;
- Calling or having somebody else call 911 to seek immediate emergency help;
- Understanding the hazards of drug powders or residue;
- How to safely administer naloxone by nasal spray and/or injection, depending on which method you use;
- How to provide any additional first aid measures necessary;
- Use of required PPE; and
- How to document and report overdose incidents in which naloxone was administered.

Step 5: Post Names of Naloxone Staffers

You must post in a conspicuous place in the workplace the names and locations of the workers in charge of the naloxone kit in the workplace and who've received the required naloxone training.

Signs & Symptoms of an Opioid Overdose

Signs & Symptoms of an Opioid Overdose

Unresponsiveness or unconsciousness

Slowed or stopped breathing

Snoring or gurgling sounds

Cold or clammy skin

Discolored lips or fingernails

Syringes, needles or other drug paraphernalia found near victim

Step 6. Properly Obtain Naloxone

Getting your hands on naloxone can be tricky. The drug comes in 2 forms—nasal spray and injection. The former is easier to administer but generally costs 5 times more than injectable naloxone. And because most hospitals, first responders and health providers use the injectable formula, nasal naloxone may also be harder to find. The good news is that local first responders and others involved in opioid overdose services should be able to help you find a pharmacy or other supplier, as well as a source where your authorized workers can receive naloxone training.

The next challenge is to ensure the stuff is dispensed to you legally. While rules for naloxone distribution differ by jurisdiction, the most common way to obtain it is by prescription from a pharmacy. In most jurisdictions, you can fill out what's called a standing order enabling the pharmacy to distribute the drug to your organization. It may also be possible to buy naloxone directly from the manufacturer or through a donation made by a nonprofit or other third party that's authorized to distribute the drug.

Step 7. Properly Store Naloxone

Employers must store workplace naloxone kits in locations that are clearly marked as containing the drug. These locations must also be readily accessible to staff members who are authorized to administer naloxone in the event of an overdose. Naloxone also must be kept in the box or storage container until used and stored away from light and at proper temperatures (generally ranging from 15° to 25° C/59° to 77° F, depending on the product). Follow the manufacturer's instructions for storing the particular product you use, including with regard to whether you can store the product in a vehicle.

Step 8. Properly Stock, Maintain & Re-Stock Naloxone

Naloxone kits must be used, stored and maintained in accordance with manufacturer's instructions. The new Ontario regulations specify that the contents of naloxone kits must be kept in a hard case for single use and promptly replaced after each use. Because naloxone has a limited shelf life, you must track expiration dates and replace supplies so they remain fresh. Account for the time needed to replace expired doses to avoid interruptions in supply. The Ontario regulations also list the contents different types of naloxone kits must contain. For a nasal spray kit:

- 2 doses of intra-nasal spray, with each dose containing 4 mg/0.1 ml of naloxone hydrochloride;

- 1 rescue breathing barrier; and
- 1 pair of non-latex gloves.

For an injectable kit:

- 2 vials or two ampoules, with each vial or ampoule containing a 0.4 mg/1 ml dose of naloxone;
- for each ampoule included in the kit, 1 device to safely open the ampoule, such as a breaker, snapper or opener;
- 2 syringes, with each syringe attached to a 25-gauge safety-engineered needle that measures 1 inch in length;
- 2 alcohol swabs;
- 1 rescue breathing barrier; and
- 1 pair of non-latex gloves.

Step 9. Provide Proper PPE for Naloxone Use

Furnish and ensure the proper use, storage and maintenance of PPE and first aid equipment necessary to deliver naloxone safely, which may include:

- Disposable nitrile gloves (which must be non-latex in Ontario);
- Safety glasses;
- Breathing barriers;
- N95 masks; and
- Sharps disposable containers (when using injectable naloxone).

Step 10. Maintain Records of Naloxone Incidents

Keep records of overdose response incidents involving naloxone as you would with other serious workplace incidents. Require the authorized worker who administered naloxone to fill out an incident report listing:

- The date, time and place of the incident;
- Whether first responders were called and if they arrived;
- A description of first aid and response measures provided, such as rescue breathing;
- How many doses of naloxone were administered; and
- The outcome—whether the victim survived, etc.

The worker should also furnish a debriefing after a certain number of days after they've had a chance to reflect on the incident, what went wrong, etc.

Step 11. Maintain Naloxone Logs

Last but not least, maintain a log tracking naloxone distribution and use at your site the way you do with first aid equipment and services.