Alcohol & Drug Use: Roadmap to Certification

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Disclosure Information

- Salaried, staff physician, private academic medical center
- My perspective ≠ FAA
- No off-label med use and/or investigational
Agenda

• Historical perspective
• Conceptualization
• ‘Classic’
• ‘Not so simple’
• Drug paraphernalia
• Judgmental error
• Alcohol-induced pancreatitis?
Objectives

• Define FAA regulations regarding addiction
• Differentiate the nuances in medical certification for an airman with addiction history / concerns
• Understand the basic model of HIMS addiction protocol specifications
Occupational Alcohol Addiction Treatment Program (1970s)

Drugs of Abuse

4 SSRIs (2010)

HIMS today (2016)

Alcohol / Drug Monitoring

SSRI Protocol
Conceptualization

- Medications
- Condition / Diagnosis
- Cognitive defects: DQ’ing
What is disqualifying?

- Specifically disqualifying All Classes: 14 CFR 67.107(a)(b), 67.207(a)(b), and 67.307(a)(b)
  - Substance dependence (a)
  - Substance abuse (b)
Alcohol dependence in SR

- 64 y/o male 737 captain AA domestic
  - Transfer of HIMS case 2015
  - Hx 2 relapses, most recent 2010
  - Saw for 12 mo return

- Documentation – onerous for a reason!

- Motivation for sobriety??
  - Oversight / checks & balances
HIMS Protocol Specifications

- FAA will require additional documentation:
  - Personal statement
  - State driving record x 10 years
  - Court records / arrest reports

- HIMS Evaluation
  - Psychiatric evaluation
    - Addiction psychiatrist OR HIMS-trained
  - Neuropsychological evaluation
    - HIMS-trained Neuropsychologist
SUMMARY – FAA CERTIFICATION AID
DRUG / ETOH RE-CERT

• HIMS AME
• Lab testing
• Psychiatry History Report
• Aftercare
• Chief Pilot
• Peer Pilot
• Additional providers
HIMS AME Checklist - Drug and Alcohol Monitoring Recertification
(Updated 5/25/16)

Airman Name ___________________________________________  PI# ____________________________

Instructions to the HIMS AME:
- Address the following items based on your in-office exam and documentation review;
- **Submit this Checklist** (it must be signed and dated by the HIMS AME); **AND**
- Include supporting documentation reviewed to complete this checklist (including your HIMS AME report) within 14 days to:

Federal Aviation Administration
Aerospace Medical Certification Division AAM-300
PO Box 26080, Oklahoma City, OK  73125-9914

I reviewed the airman’s HIMS Authorization Letter dated: ________________________________
(date of Authorization letter)

1. **HIMS AME FACE-TO-FACE, IN OFFICE EVALUATION:** Required **EVERY 6 months for ALL CLASSES**
   Any concerns that the airman is not successfully engaged in a continued abstinence-based recovery program or is not working a good program based on your clinical interview/evaluation and review of reports? ……………
   - Interval evaluations (every 3 months or as required by Authorization Letter) were unfavorable? ……………
   - Any evidence or concern the airman has not remained abstinent? …………………………………………
   - Any positive drug or alcohol tests since last HIMS evaluation? …………………………………………
   - Any evidence of noncompliance or concern the airman is not working a good recovery program? ……………
   - Any NEW condition(s) that would require Special Issuance? (Do not include any new CACI qualified condition) ……………………………………………………………………………………………

2. **TREATING PSYCHIATRIST REPORT or HIMS PSYCHIATRIST REPORT:** Required **EVERY 12 months for ALL CLASSES** unless a different time interval is specifically stated in the Authorization Letter
   - Report(s) is/are favorable (no anticipated or interim treatment changes) ………………………………………
   - The psychiatrist recommends no additional treatment or monitoring ……………………………………………
Items 3 - 5: The AME should review. Do not submit these items (3-5) to the FAA unless concerns are noted.

3. **AFTERCARE COUNSELOR REPORTS:** For 1<sup>st</sup> and 2<sup>nd</sup> class: Required every 3 months; 3<sup>rd</sup> class: Per Authorization Letter
   - Show continued participation and abstinence-based sobriety? ........................................

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4. **CHIEF PILOT REPORT(S):** Required monthly for commercial pilots holding first- or second-class certificates (N/A for third-class):
   - Report(s) is/are favorable? .................................................................

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5. **PEER PILOT REPORTS:** Required monthly for commercial pilots holding first- or second-class certificates (N/A for third-class):
   - Report(s) is/are favorable with continued total abstinence? ................................

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6. **ADDITIONAL REPORTS.** Required ONLY when specified by the Authorization letter
   - HIMS related (AA attendance, therapy reports, etc.) are favorable and meet authorization requirements.................................................................
   - Reports required for other non-HIMS conditions all meet Authorization requirements

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7. I have no other concerns about this airman and recommend re-certification for Special Issuance. ............

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__________________________  __________________________
HIMS AME Signature Date of Evaluation

If ALL items fall into the clear column, the AME may issue with the time limitation specified in the Authorization letter.

If ANY SINGLE ITEM falls into the SHADED COLUMN, the AME MUST DEFER or contact the FAA for guidance AND EXPLAIN in the HIMS evaluation report.
A not-so-simple case…

• 47 y/o male, married w/ 2 children, student pilot seeking 3rd class
  • Hx of 2 SAP, 2001 & 2017
  • Last use Etoh 2012, but…
• Histrionic traits, 6 wks anhedonia 2001
• Opiate abuse SR, Ritalin abuse, ER
• Tobacco use, on 21mg, ↓ 4
• 1 THC brownie Jan 2017
FAA: “SUBSTANCE” includes…

- Alcohol, PCP, sedatives and hypnotics, anxiolytics, marijuana, cocaine, opioids, amphetamines, hallucinogens, and other psychoactive drugs or chemicals

www.ohsutp.ca/topics
FAA Def’n of Substance Abuse

• Physically hazardous to situation
• (+) drug test
• Etoh ≥ 0.04
• Refusal to submit to DoT Etoh/drug test
• Misuse that the Federal Air Surgeon finds…
FAA: Definition of Misuse

• Makes person unable to safely perform duties OR exercise airman certificate privileges

• May be reasonably be expected (for duration of med cert) to make person unable to...

• Based on case hx and medical judgment
Could he get certified?

- Hx substance dependence ➔ Defer! ⭐
- Follow clinical recs!
- Severity of disease
- Identifiable stressor(s) for relapse??
- Not every condition is DQ’ing
“Not my [cannabis paraphernalia]”

• 31 y/o single, never married, female student pilot seeking 3rd class
• Hx of anxiety, alcohol, and THC
• Red flags
  • Easy to elicit / some NPV
• Insight into disease / stages of change
  • ↑ chance for SI
More cases for discussion

• 33 y/o male private pilot w/ Etoh-related incident
  • FAA letter 3rd class still valid
  • License suspension ≠ alcoholism, but…
  • **If in doubt, DEFER!**

• What constitutes a motor vehicle action?
FAA: Motor Vehicle Actions

- DWI / DUI / OWI
- Arrest / conviction / admin action
- Affecting driving privileges
- Involved alcohol or drugs
- Attendance at rehab / educ program
- Any licence actions including test refusal
- Educational safe driving program for multiple speeding convictions
Reporting of Motor Vehicle Actions

• 8500 history does *not* alleviate airman’s reporting req’t of

• FAA requires reporting within **60** days of occurrence

• Airman must report it to:

  SECURITY AND INVESTIGATIONS DIVISION
  AMC-700
  P.O. BOX 25810
  OKLAHOMA CITY, OK 73125-0810

• AKA the (Civil Aviation) **Security Division**
More cases for discussion

• 41 y/o male 767 FO hx DUI & pancreatitis (June Flight Physician)
  • BAC 0.184

• Any regulatory components present?
• Tolerance – ? (must defer ≥ 0.15)
• Withdrawal – not present
• Impaired control of use – not present
• Physical health or impairment – present
• Personality/neurosis/mental health – not present
• Physically hazardous situation – present (DUI 2008)
Questions & Discussion

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