

The Bill Blackwood  
Law Enforcement Management Institute of Texas

=====

The Need for Mandatory Drug Testing of Police Officers

=====

An Administrative Research Paper  
Submitted in Partial Fulfillment  
of the Requirements for Graduation from the  
Leadership Command College

=====

by  
K. E. Francis

Sherman Police Department  
Sherman, Texas  
December, 2001

## ABSTRACT

Illegal drug usage by police officers is a serious issue for modern police administrators to deal with. The purpose of this administrative research paper is to determine if there is a valid need and indeed a moral and ethical mandate for mandatory random drug testing of police officers.

To answer these questions it was necessary to look at the extent of the problem through statistical analysis, observations, legal issues, a survey, interviews, written books, and articles by experts in the field. The Internet also proved to be a vast resource of information in both the public and private sectors. There is a wealth of case law available to support the need of mandatory random drug testing: most notably National Treasury Employees v. Von Raab and Skinner v. Railway Labor Executives Association. Also, there are numerous news stories available detailing an infinite variety of drug related issues regarding police officers. These included officers using drugs, selling drugs, or protecting drug dealers for money. Unfortunately, there are even cases where officers involved in drugs have committed murder.

The findings easily support the conclusion that mandatory random drug testing is necessary. The need to insure public safety and confidence in their police officers is sufficiently important to justify overriding officer's rights in this matter. Every agency must develop policy and procedures using officers of all ranks. It is imperative that such testing be done in a manner that is both consistent with case law and is both truly mandatory and random for all officers from the top down.

## TABLE OF CONTENTS

	<b>Page</b>
Abstract	
Introduction.....	1
Review of Literature.....	4
Methodology.....	9
Findings.....	10
Discussion/Conclusions.....	14
References.....	18
Appendix	

## INTRODUCTION

Normally, when a person thinks of drugs and police officers, they think of drug busts. Unfortunately, police officers are not immune to the temptations of illegal drug usage or the misuse of prescription medication (Harvey, 1991). In fact, the ever-increasing stressors in policing indicate that officers might be more susceptible to that temptation today (Anderson, Swenson & Clay, 1995; White-Longmire, 1991). Due to this factor, as well as those discussed later, it is hypothesized that mandatory random drug testing is not only legal but also appropriate to ensure public safety and retain public confidence in their police.

This topic is critically important to police department administrators today and is also of great concern to the citizens whom the officers are sworn to serve. This is due, in large measure, to the inherent safety concerns involving drug usage or abuse of prescription medication by police officers. Not only are they armed but they also drive emergency vehicles and if affected by illegal drug use, the safety of all is at risk. In addition, corruption, use of force decisions, and perjury questions rear their ugly heads and demand attention.

There are several issues that naturally arise when considering the testing of officers for drugs. First, it is necessary to resolve the legal issues governing mandatory and random drug testing (Thomas and Means, 2000; Sorensen and Carmen, 1991; McLeer & Maureen, 2000; McDermott & Jones, 1988; Wefing, 2000). Also, there are the issues of confidentiality, availability of assistance programs to help officers who come forward with a drug problem, and the accuracy, quantity, and types of tests to be given. In addition, there is the necessity to determine what the testing procedures will be and what actions will be taken, should an officer fail a drug test(s). All of these questions need to be answered and then addressed in the format of policy and procedures based on intensive study and research.

The methods of inquiry to be used to address these issues are:

- Research into current laws and court cases regarding drug testing of officers;
- Interviews and surveys of police agencies to determine how many already have a
- policy and procedure in place; and,
- Research of written information including the Internet, books, journals, magazines, and government reports on the issue of drug testing officers.

Also, it would be invaluable to research drug testing in the private sector to compare common needs, issues, and problems.

The creation of a policy and procedure addressing this issue will afford a police agency the means to address the safety concerns inherent with police officers who may use illegal drugs or abuse prescription medication. As previously noted, these concerns include deadly force issues and emergency vehicle operation. In addition, officer integrity also becomes a natural concern since drug usage by an officer compromises their standards and ability to make ethical decisions and can lead to other criminal behavior (Saenz, 1995; Carter & Stephens, 1988)

Positive public opinion and the community's continued support of a police department is also an important factor in the need to implement and administer drug testing (Harvey, 1991). The implementation of drug testing demonstrates a department's continuing commitment to being the most professional and accountable agency possible and it also engenders public confidence in the agency. Taking the proactive stance of drug testing officers significantly reduces a police department's liability by providing a mechanism to identify potential problems before they have a serious negative impact (Harvey, 1992; Kurke & Scrivner, 1995; White Longmire, 1991).

As a public entity dedicated to protecting and serving people, a police department has an obligation to do all that it reasonably can to protect citizens and, therein, implementing mandatory random drug testing is one more method available to do so. It is too costly in human and monetary terms to ignore; to do so is at one's peril.

## REVIEW OF LITERATURE

Is drug abuse by police officers a problem? According to an article in the Boston Globe dated Thursday, October 21, 1999, it is. The article discussed research conducted at Northeastern University indicating that 1-3% of police officers in major U.S. cities test positive for drugs (Buerger, as cited by Latour, 1999). The Boston Globe article also quoted Boston Police Commissioner Evans saying that even if he had one officer testing positive, he had a problem. The Boston Police Commissioner also said that drugs were probably the single biggest threat to the integrity of officers and his department. He added that any officer under the influence of drugs was something that could not be tolerated.

Recent newspaper and media stories were found indicating the timeliness of this question. One such heading read: "23 Officers in Boston Test Positive for Drug Use" (Latour, 1999); "Police Drug Scandal Shocks San Antonians" (2001). In this story, it relates the result of a four-year FBI investigation in which eight San Antonio Police Department officers, one Bexar County Sheriff's deputy, and one Bexar County deputy constable were arrested. The charges in this case ranged from dealing drugs to protecting drug dealers. The citizen's quoted in this article were clearly stunned and outraged at the officer's actions. Similar headlines were quoted in the prologue to Carter and Stephens book Drug Abuse by Police Officers: An Analysis of Critical Policy Issues (1988). Some examples of these are: "Police Nab Drug Officer" from the *Lansing State Journal* (1987) in which an narcotics officer was keeping drugs he bought undercover using state money; "Confessions Uncover Drug Ring in Miami Police Department" also from the *Lansing State Journal* (1987). This article involved two Miami officers killing four drug dealers, stealing their cocaine, and the attempted murder of two federal witnesses.

This problem is not just limited to a United States issue, as exemplified in these foreign news story headings: "Heroin, Cocaine Found In Body Of B.C. Drug Cop" (2001); "Surprise Drug Testing of Police Officers Leads to Dismissals" (1996). Another such headline was found in a British article "Officers Who Admit to Drug Problem Will Escape Sack" (2000). Yet another article pointedly addressed the negative effects of a police officer's illegal drug usage and involvement by stating that it only takes one such incident for a department to lose its credibility (Harvey, 1992).

An often-stated causal factor of officer drug use is stress, both on and off the job, although there is a very small minority that argues against stress as a factor in officer drug usage (Carter & Stephens, 1988). Carter and Stephens contend that in the case of simple recreational usage of illegal drugs by officers, stress is not a causal factor. It is their belief that this argument can't be true because drug use by the officer would increase and not decrease the officer's stress. By far, the prevalent attitude among researchers and authors alike is that stress is definitely a factor (Kurke & Scrivner, 1995; Anderson, Swenson, & Clay, 1995; and White-Longmire, 1991). They often refer to extensive studies on alcoholism and even though alcohol in reality only exacerbates the officer's stress and problems, it doesn't stop them from abusing it. They contend that the same holds true in officer drug usage. It provides a means of momentary escape so it is sometimes sought out by an officer unable to cope with stress, even when they know it's destructive nature.

One source also does a good job of denoting some causes of officer stress, such as the very nature of police work itself including shift work, shift rotation, irregular hours, and isolation (White-Longmire, 1991). It also points out another important, yet often overlooked, factor in an officer's decision to use illegal drugs: social attitudes in the United States that encourage



drinking, and to some extent, the use of illicit drugs. Television, movies, and magazines often send out a positive, sophisticated, glamorous and mature image of alcohol use as well as a tacit approval of some types of drug usage.

It is readily apparent from the literature available that drug use among officers is a problem today. However, it is not without its opponents. Notably the ACLU in its writings opposes such drug testing on the basis of violation of constitutional rights and the questionable accuracy of the testing methods themselves (ACLU, 2001). There is, however, a considerable number of state and federal court cases that affirm that the need *for* public safety outweighs the usurping of an officer's rights in this matter. Most notable are National Treasury Employees v. Von Raab (1989); Skinner v. Railway Labor Executives Association (1989); Phillip Seelig President of Corrections Officers Benevolent Association of City of New York ET.AL. v. Richard J. Koehler-Corrections Commissioner of the City of New York(1989); Eivor Brown. Audrey Low. Felicia Colbert. Constance Cannon v. The City of Detroit (1989); and Roger Shamley v. The City of Chicago (1986). All of these cases point out and affirm that because of the authority and power granted to a police officer as well as the potential *for* harm that could be wrought upon the public, mandatory and random drug testing is reasonable and constitutionally defensible. The main points of the Von Raab case, which has set the tone *for* all other cases since, are: 1) the Commissioner of the U.S. Customs Service implemented a mandatory drug testing policy which allowed drug testing without a warrant or even suspicion, 2) the new policy applied to Customs employees involved in law enforcement and who sought promotion or transfer into any assignment that involved drug interdiction, carrying of firearms, or access to sensitive or classified information. The Supreme Court ruled in favor of Commissioner Von Raab on the following critical points: 1) the Custom's Service, or any other governmental law

enforcement entity for that matter, had a compelling interest in safeguarding public safety, 2) the warrantless and suspicionless search, in these narrow interests, outweighed individual employee privacy rights.

The issue of public safety is the biggest single issue that differentiates public and private drug testing of employees (Carter & Stephens, 1988 and Thomas & Means, 2000). In the private sector, other than transportation issues governed by the Department of Transportation (DOT), there are no grounds for mandatory random drug testing (DOT, 2001). Because of the need of government to safely regulate commerce and transportation, the DOT is empowered to also drug test randomly. Once again, public safety is the key. The private sector must use the reasonable suspicion test in order to force an employee to take a drug test (Wefing, 2000). This is not so in the public sector where public safety is at issue.

Another reason for mandatory random drug testing of officers cited in the reviewed literature is that the public expects their officers to be drug free as is exemplified in a poll that showed 85% of public supports the testing of officers (Harvey, 1991). One citizen said in a newspaper article, in essence, that officers are people with highly stressful jobs, who go where the rest of society doesn't want to go and that people don't want someone stopping them with a gun who's high on cocaine (Gross, as quoted by Latour, 1999). Yet another reason is the issue of agency liability and the sometimes-overlooked issue of negligent retention (Kurke & Ellen, 1995). They go on to state that negligent retention involves keeping an employee even when there is sufficient information or it is blatantly obvious, that an employee should not be kept.

The literature available indicates that the current and most reliable method of drug testing is a procedure utilizing a person's hair (Reed, 1999). Psychomedics Corporation, the

largest hair testing company used by federal, state, and local police agencies, also claims this as reported in Drug Testing News (2000).

## METHODOLOGY

Is mandatory random drug testing of police officers necessary? It is believed that not only is it necessary but it is both morally and legally expedient. The research, it is believed, will bear this out.

The method of inquiry is that of research of relevant writings in book and article form from experts in the field. Certainly the use of current examples of police misconduct regarding drug usage, specifically in media accounts, is also necessary. In addition, a survey consisting of a questionnaire of twenty-five police agencies attending LEMIT Module I was used (See Appendix). The agencies ranged in size from 1 officer to 1,300 officers. There were six questions asked on the survey. Out of twenty-five surveys issued, there were twenty-five responses received for a 100% response rate. Personal observations of fellow officers both in Ft. Worth while employed there during the 1980's as well as in Sherman recently were also an integral part of the research as was an interview with the Director of the City of Sherman's Human Resources Director a few months ago.

The information obtained from these various methods of research will show that illegal drug usage by officers is a valid problem in law enforcement today. It will show that safety concerns, ethical, and liability issues are sufficiently present to warrant mandatory drug testing of police officers. It will also show that case law and citizen expectations and needs support this type of policing of the police. All available data will be analyzed through the use of comparison of available data, distillation of key points, and new research to determine the extent and nature of officer involved drug usage and related drug problems as well, such as selling of drugs by officers or other illegal behavior.

## FINDINGS

Is there a need for mandatory random drug testing? There are approximately 738,000 sworn officers in the United States, according to the Bureau of Justice (Bureau of Justice, 1996). There are approximately 1-3% of officers using drugs according to a study conducted by Northeastern University (Buerger, as quoted by Latour, 1999). This translates into 7,380 to 22,214 officers illegally using drugs in police agencies of all sizes nationwide.

A survey was also conducted as research for this paper. It consisted of a questionnaire of twenty-five police agencies attending LEMIT Module I (See Appendix). The agencies ranged in size from 1 officer to 1,300 officers, throughout the State of Texas and there were six questions asked on the survey. Out of twenty-five surveys issued, there were twenty-five responses received, for a 100% response rate. One of the questions asked was "Does your agency have mandatory random drug testing?" The response was that eleven out of twenty five agencies did have such programs as noted in Figure 1. One respondent marked "no" but added "But may start (rumor)." This is a telling percentage of agencies that responded that felt that mandatory random drug testing was necessary.

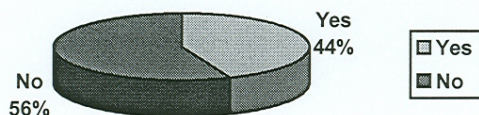
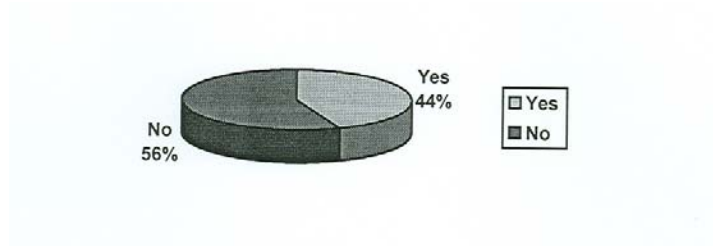


Figure 1. Agencies having mandatory random drug testing from survey.

Another question asked was "Has your agency ever had to deal with an officer using illegal drugs or abusing prescription medicine?" The answer, again from eleven agencies, came

back "yes" as is found in Figure 2.



**Figure 2.** Agencies having officers using illegal drugs from survey.

Interestingly, it was not always the same agencies that answered yes to the latter question, as did the former question.

Yet another factor is stress. It cannot be argued that police officers have a stressful job; they see all the worst that society has to offer. An accurate description of police work is that of 90% sheer boredom punctuated by 10% sheer terror. One has only to look at the tragic event of September 11, 2001, to see what trauma and inhuman vistas a police officer can be forced to not only behold but also in which to function. Social attitudes in the United States also encourage drinking, and to some extent, the use of illegal drugs. All one has to do is watch television and movies to see that such activity is often looked upon as exciting, funny, or most insidious of all, normal and acceptable.

The Human Resource Director for the City of Sherman in February 2001, George Olsen, was interviewed about the desirability of mandatory random drug testing of police officers in the Sherman Police Department. He was definitely in favor of it and wanted to see the research when completed. He said that currently the City of Sherman only did drug testing on employees for reasonable suspicion issues. He also said that the current method of testing involved urine

samples and cost around \$50 to \$70 as best he could recall. On December 5, 2001, Wayne Blackwell, the current City of Sherman Personnel Administrator, was interviewed. He advised that the provider of this testing service to the City of Sherman is the company One Medical, and the cost per test is \$48.00. Wayne also said that he is currently switching providers of urine drug testing of employees to Texoma Medical Center (TMC) Urgent Care. He said the reasons for the change was that TMC will only charge \$35.00 per test and that they also have a local Medical Review Officer (MRO) if there are any questions or challenges regarding the testing. Wayne went on to say that he had learned through his research that urine testing only had a short time frame to detect drugs and could be defeated using certain teas and even pickle juice. He went on to say that hair testing was better but very expensive.

Through Internet research, it was learned that, although urine testing is the most common, and perhaps the cheapest form of testing, a more accurate testing method using a person's hair is available, as was mentioned by Wayne Blackwell. On December 05, 2001, the main provider of hair testing, Psychemedics Corporation, located in Cambridge Massachusetts, was contacted and Kim McGrath was interviewed by phone, 800-628-8073. She stated that the cost of the hair testing ranged from \$35.00 to \$60.00, depending on the number of persons to be tested. She also said that the hair testing procedure could detect drugs in a person's hair for up to 90 days whereas urine testing could only detect them for a much shorter period. Kim also stated that urine testing was not as reliable as hair testing because drinking a lot of water could dilute and flush the urine, or drug residue could be cleansed from the system or masked. The hair trapped the drug residue within the core of the strand of hair.

An historical observation was made from President Calvin Coolidge who said:

*No one is compelled to choose the profession of police officer, but having chosen it, everyone is obligated to perform its duties and live up to the high standards of its requirements.*

(Calvin Coolidge).

The findings support this completely.



## DISCUSSION/CONCLUSIONS

Is there a need for mandatory random drug testing of police officers? It is believed that there is. The literature available and the research conducted readily supports that any illegal drug usage by police officers is unacceptable and that mandatory random drug testing is both necessary and legal.

Negative media attention confirms and highlights that any incident involving an officer and illegal drug use is severely damaging to the image of a police department and police officers in general. It is apparent that sensational stories garner more public attention than do those that aren't. Who can doubt the damage caused to police image nationwide by the Rodney King debacle in Los Angeles or the Abner Louima incident in New York, where an officer beat and sodomized Mr. Louima with a plunger handle? Such media attention is severely damaging to the public confidence in the affected agency and can foster mistrust or loss of support from the community, which once lost is difficult to regain. One could scarcely imagine the horror and dread a police chief would feel if one late night he or she is awakened by a call and told that one of their officers was involved in a deadly collision killing a family of four. Now imagine how that initial dread and horror would increase when that chief is told that drugs were found in the officer's system? Worse yet, how could that chief face the ensuing media circus and the grieving victim's family when it is learned that there wasn't any mandatory random drug testing required in that agency. Would any excuse of "It was too costly" or "It was too much of a hassle to implement" endure the light of day and the ridicule and anger that would surely follow such a statement? How would the pathetically irresponsible excuse of "I didn't know there was a problem" play to the media and the public if there wasn't a mechanism in place in the department to determine if there was such a problem, especially when the means exists to do so?

The damage to the department, as well as the governing body, in such a scenario is truly incalculable. Is it a plausible scenario? Sadly, yet certainly, it is.

Police Officers are tasked with an ominous and daunting responsibility. They are to make life and death decisions as well as to protect people and property; nowhere does illegal drug use have a place in their personal lives. As a public entity, a police department has an obligation to do all that it reasonably can to protect and serve citizens and therein mandatory random drug testing is ethically imperative as a tool to accomplish these goals and mission. The public demands that their officers be free from drugs so that they will use sound judgment in making decisions as complex as using deadly force or as simple such as to whom to give a traffic ticket to. The public also has a right to protection from an officer's driving under the influence of drugs. They expect their officers to exemplify the best that society has to offer. Drugs have no part in this expected and demanding image.

One is invariably compelled to ask when trying to determine if a problem exists: Why do police officers, who have seen first hand the devastating nature of drugs, themselves turn to their use? The answer is not simple or even singular in nature. It was found through observation that a painful and enduring injury may be the culprit in the officer's drug usage. Personal knowledge of a fellow officer verifies this as a sometimes cause in drug abuse by officers. Not too many years ago, a well-respected Sergeant of the Ft. Worth Police Department who had injured his back on duty and was given prescription painkillers was suddenly cut off from them, yet the pain remained. It was reported that his well meaning and loving wife, a nurse, continued to provide the painkillers to him until she realized the scope of his addiction. When she failed to continue to supply the painkillers, he resorted to committing late night, on-duty, burglaries of pharmacies. He was caught after several months because suspicion was aroused when it was recognized that

he was always the first on the scene to find and call the burglaries in. A resulting internal affairs investigation caught him red-handed committing a burglary and coming out with the narcotics. The tragic result of his addiction was that he was terminated and an otherwise promising law enforcement career was destroyed. Could random mandatory drug testing have prevented this? One thing is certain, without it there was little or no hope to save this man's career as is evidenced by the outcome.

Another example of this was when a fellow Sherman, TX. police officer also got addicted to prescription painkillers after an injury. He was ultimately seen, at least two times, in uniform and on duty, under the affects of the narcotics he continued to take long after he should have stopped. His addiction was so bad that when one doctor refused to prescribe any further medication, he would go to another doctor until he finally had to go to doctors in cities as far as one hundred miles away. Obviously this was a long time addiction yet it was never identified and addressed. The end result of this officer's addiction was more tragic than the previous story. He ended up losing his family, his job, and his career. There was no mandatory random drug testing in Sherman at the time. As of this writing there still isn't, but it is why this research topic was chosen. Clearly, these personal knowledge stories are prime examples of why mandatory random drug testing is necessary.

Another possible factor in officer drug usage that was uncovered is the sheer availability of any and all types of drugs that officers come into contact with. An officer constantly comes upon illegal and legal drugs through arrests, undercover operations, and property control. Personal experience in Police work for over 21 years bears this out.

It then must be concluded, that police management must use mandatory random drug testing as a means to both deter and detect drug use among those entrusted with the safety and

peace keeping of society. Not only is it desirable, it is strongly suggested that every agency develop policies and procedures that are both legal and practical. These policies and procedures, as well as the values contained within, in addition to being universally disseminated, must be taught to every officer by use of in-service training. Officers of every rank should be used to develop these policies and procedures, in order to help ensure fairness and a workable system, so that adherence to them will be optimal. Of utmost importance is that it must be truly mandatory and random with everyone, from the chief down participating. To do less is irresponsible, indefensible, and a horrendous failure to ensure the protection of the citizen's who have placed their trust, faith, and confidence in the police.

This survey is for my research into police officer drug testing. Please take a few minutes to answer the questions and return to me as soon as possible.

1. Does your agency have mandatory random drug testing of officers on a regular basis?

Yes No

2. Has your agency ever had to deal with an officer using illegal drugs or abusing prescription medication?

Yes No

3. If you have drug testing, is it covered in departmental or city policy?

Department City Both

4. What is the population of your city/county?

5. What is the size of your department'!

6. May I contact you later to get a copy of your policy? (if applicable)

Yes No

Thanks.

Ken Francis

## REFERENCES

American Civil Liberties Union. (2001). American Civil Liberties Union homepage [On line] . Available: <http://www.aclu.org/issues/worker/legkit3.html>.

Anderson, W., Swenson, D., & Clay, D. (1995). Stress management for law enforcement officers. Edgewood Cliffs, NJ: Prentice Hall.

Brown, Cannon, Colbert, & Low v. The City of Chicago, Civil No. 88-72335 (S.D. Mic. 1989).

Carter, D. & Stephens, D. (1988). Drug abuse by police officers: An analysis of critical policy issues. Springfield, IL: Charles E. Thomas.

DOT homepage [On-line]. Retrieved on August 9, 2001 on the World Wide Web. Available: <http://www.fmcsa.dot.gov/rulesregs/fmcsr/regs/382101.htm>.

Drug testing news homepage [On-line]. Retrieved May 16, 2001 from the World Wide Web. Available: <http://www.aaaathomedrugtests.com/link-pages/drugtestnews.htm>.

Harvey, A. (1991). Drug abuse and testing in law enforcement: No easy answers. FBI Law Enforcement Bulletin, June, 12-15.

Heroin, Cocaine Found in Body of B.C. Drug Cop, check tv homepage [On-line]. Retrieved May 16, 2001 on the World Wide Web. Available: [www.checktv.com/ca/news/stories/news-20010104-171841.html](http://www.checktv.com/ca/news/stories/news-20010104-171841.html)

Kurke, M. & Scrivner, E. (1995). Police psychology into the 21st century. Hillsdale, NJ: Lawrence Erlbaum Associates.

Latour, F. (1999). The Boston Globe home page, [On-line]. Available: <http://www.policedrugtesting.com/globe.html>.

McDennott, M. & Jones, K. (1988). Mandatory drug testing in the United States Department of Transportation: A fourth amendment analysis. Transportation Law Journal, 17, 1-27.

McLeer, M & Maureen, K. (2000). Balancing public safety and the right to privacy: The New Jersey Supreme Court affirms random drug testing for public employees holding safety sensitive positions. Seton Hall Constitutional Law Journal, Spring, 10, 455-486.

National Treasury Employees v. Von Raab, 109 S. Ct. 1384 (1989).

Officers who admit to drugs problem will escape sack, Jane's law enforcement homepage [On-line]. Retrieved May 16, 2001 from the World Wide Web. Available: [www.janes.com/security/law\\_enforcement/news/pr/pr000615\\_n\\_3.shtml](http://www.janes.com/security/law_enforcement/news/pr/pr000615_n_3.shtml).

Police drug scandal shocks San Antonians, K12 San Antonio news homepage [On-line]. Retrieved on September 5, 2001 from the World Wide Web. Available: [www.clickonsa.com/ant/news/stories/news-55693120010323-120316.html](http://www.clickonsa.com/ant/news/stories/news-55693120010323-120316.html).

Reed, D. (1999). The drug testing news homepage [On-line]. Retrieved on May 16, 2001 from the World Wide Web. Available: <http://www.aaaathomedrugtests.com/link-pages/drugtestnews.htm>.

Saenz, L. (1995). Police drug testing. Unpublished manuscript.

Seelig v. Koehler, [No Number in Original] (S.c. New York, 1989).

Shamley v. City of Chicago, No. 86-3528 (Ill. Ct. App. 1986).

Skinner v. Railway Labor Executives Association, 109 S. Ct. 1402 (1989).

Sorensen, J. & Cannen, R. (1991). Legal issues in drug testing police officers. Police Liability Review, Spring, 3, 1-4.

Surprise drug testing of police officers leads to dismissals. The New Mexico State University homepage [On-line]. Retrieved May 16, 2001 on the World Wide Web. Available: [www.nmsu.edu/~frontera/old\\_1996/oct96/1096poli.html](http://www.nmsu.edu/~frontera/old_1996/oct96/1096poli.html)

Thomas, J & Means. (2000). Managing police discipline. Huntersville, NC: Author.

Wefing, J. (2000). Employer drug testing: Disparate judicial and legislative responses. Albany Law Review. 63. 799-831.

White-Longmire, L. (1991). Alcohol and drug prevention strategies for law enforcement. Huntsville, TX: Sam Houston Press.