PART ONE: VIOLATIONS AND SANCTIONS

The number of drug and alcohol-related violations that occurred on a campus or as part of any campus activity reported to campus officials: 0

The number of drug and alcohol-related fatalities that occurred on a campus or as part of any campus activity reported to campus officials: 0

The numbers and types of sanctions imposed by National College as a result of drug and alcohol-related violations and fatalities on a campus or as part of any campus activity: 0

The number of each sanction imposed as a result of drug and alcohol-related violations and fatalities on a campus or as part of any campus activity:

- 0 Employees placed on probation
- 0 Employees dismissed
- 0 Employees referred for treatment
- 0 Employees attending self-help or other counseling groups
- 0 Employees reported to law enforcement
- 0 Students placed on probation
- 0 Students dismissed
- 0 Students referred for treatment
- 0 Students attending self-help or other counseling groups
Students reported to law enforcement

PART TWO: EVALUATION OF PROGRAM EFFECTIVENESS

We reviewed our existing practice with respect to the ongoing collection of data. That practice relied upon reporting by individual campuses using a Drug or Alcohol Incident Reporting Form. The form was to be submitted contemporaneously with any incident involving drugs or alcohol. It was backed up by periodic (biennial) queries to Campus Directors specifically asking for information about any incidents involving drugs or alcohol. Potential issues with accuracy and effectiveness were identified, to include:

- Failure of a campus to submit Drug or Alcohol Incident Reporting Forms whenever an incident occurred
- Failure to understand what incidents required reporting
- Failure to maintain forms which were submitted
- Failure of the backup queries to catch any incidents which may have gone unreported due to: Passage of time or Change in personnel

In order to test the prior collection of data, and to attempt to understand further some of the potential flaws in the data collection system, the college sent two emails to Campus Directors requesting data covering the 2014 and 2015 calendar years. The first email was relatively non-specific with respect to a definition of "incidents involving drugs or alcohol," and the second provided a clarified definition. In addition, the college reviewed other data it had available to try to identify any inconsistencies. Specifically, the college examined its Annual Security Report data (2012, 2013, and 2014 plus preliminary data for 2015) which includes reporting for drug-law related offenses and liquor-law related offenses.

Both sets of emails elicited negative reports from all campuses. No incidents of violations of the college's DAAPP were reported. Further, no arrests for liquor-law or drug-law violations were reported for any campus during the reporting period. Accordingly, no discrepant reporting was identified and no conclusions could be drawn directly from an analysis of the data.

Based on zero reports of violations and zero reports of sanctions imposed the college cannot conclude that the program has been ineffective or that sanctions have not been imposed consistently.

Notwithstanding these results, the college has concluded that improvements in the program can be made, and accordingly has made revisions to its DAAPP, to its policies and procedures implementing the DAAPP, and to the collection and review of data to analyze and evaluate the effectiveness of the program.

In addition, the college’s review of its program as part of this biennial review and coincident with the college’s review of the findings set forth in the PRR have resulted in additional recommendations to enhance the faculty and staff’s knowledge and understanding of the college’s DAAPP and the importance of vigilance in implementing it.

PART THREE: RECOMMENDATIONS
No change to current program  

X Make changes to current program as follows:

Based on the review and the College’s desire to ensure that the DAAPP is effective the following recommendations have been made:

The college should review the training provided to responsible faculty and staff to ensure that their knowledge of the DAAPP is adequate to ensure success in its implementation. Specific subjects which should be considered include:

- Distribution of information about drug and alcohol abuse, and the college’s DAAPP
- Vigilance to identify abuse by students, faculty or staff
- Clarification of incidents requiring action and reporting
- College sanctions, the basic for sanctions and consistent application

The College should further examine its reporting procedures to ensure that responsible staff understand reporting requirements, and create a revised reporting schedule for back-up queries to campuses. Clarification could be provided through:

- Additional detail in SOP
- Additional detail on reporting form

PART FOUR: SIGNATURE OF PERSON MAKING THE REVIEW

Signature  
Cathy E. Plunkett, Ed.D.

Date  
6-1-16
CHANGES IMPLEMENTED AS A RESULT OF THE REVIEW

The College will require that campuses send a semi-annual report of violations and sanctions of the DAAPP to supplement the required incident reports which are made on an incident by incident.

SIGNATURE OF PERSONS APPROVING IMPLEMENTED CHANGES

Signature
Cathy E. Plunkett, Ed.D.

Date
6-1-16