



## **Drug and Alcohol Abuse Prevention Program**

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# **2022 BIENNIAL REVIEW OF INSTITUTIONAL COMPLIANCE**

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## **INTRODUCTION**

Southern Careers Institute (“SCI”) provides a safe, drug- and alcohol-free environment for students, employees, and visitors. The institution’s Drug and Alcohol Abuse Prevention Program (“DAAPP”) will support SCI’s commitment to promoting and maintaining an alcohol- and drug-free institution.

The Drug-Free Schools and Communities Act of 1989 (20 U.S.C. §1011i, 34 C.F.R. Part 86), requires that all institutes of higher education (“IHE”) adopt and implement a drug and alcohol abuse prevention program (DAAPP) to prevent the unlawful possession, use, or distribution of illicit drugs and alcohol by all students and employees on campus or as part of any of its activities. The DAAPP must be distributed annually to all students and employees.

The DAAPP includes:

1. Standards of conduct that clearly prohibit, at a minimum, the unlawful possession, use, or distribution of illicit drugs and alcohol by students and employees on school property or as part of any of school activities;
2. A description of the applicable legal sanctions under local, state, or federal law for the unlawful possession or distribution of illicit drugs and alcohol;
3. A description of the health risks associated with the use of illicit drugs and the abuse of alcohol;
4. A description of any drug or alcohol counseling, treatment, or rehabilitation or re-entry programs that are available to employees or students; and
5. A clear statement that SCI will impose disciplinary sanctions on students and employees (consistent with local, state, and federal law), and a description of those sanctions, up to and including expulsion or termination of employment and referral for prosecution, for violations of the standards of conduct.

This DAAPP is intended to comply with the requirements of the Drug-Free Schools and Communities Act of 1989 and applies to all students and employees of the institution.

## **DAAPP BIENNIAL REVIEW PROCESS**

The law further requires that the institution conduct a biennial review of its program with the following objectives:

- Determining the effectiveness of the program and implementing changes if they are needed; and
- Ensuring that disciplinary sanctions are consistently enforced.

The biennial review must also include a determination as to:

- The number of drug- and alcohol-related violations and fatalities occurring on campus or as part of campus activities that are reported to campus officials; and
- The number and types of sanctions the institution imposes on students or employees because of such violations or fatalities.

Southern Careers Institute conducts a biennial review of the DAAPP on even-numbered years to meet these objectives and provide these statistics. The Biennial Review process for 2022 was concluded in May 2022 and includes data from 2020 and 2021.

In even-numbered calendar years, SCI will form a committee consisting of representative of student- and employee-facing departments to conduct a biennial review of the DAAPP. Each review determines the program’s effectiveness and ensure that sanctions imposed for violations of the standards of conduct identified in the DAAPP are consistently enforced. The review also identifies any changes to be implemented during the next biennium should any changes be necessary following the review.

The DAAPP biennial review draws upon available data sources which may include, but are not limited to internal tracking of the following reported by campus:

1. Number of drug- and alcohol-related disciplinary sanctions imposed;
2. Number of drug- and alcohol-related referrals for counseling or treatment;
3. Number of drug- and alcohol-related incidents recorded; and/or
4. Number of drug- and alcohol-related incidents of vandalism.

A copy of the final Biennial Review Report is signed by the President and the Chief Executive Officer and maintained at the corporate office and in the Campus Director’s office at each campus location.

The Biennial Review (“Review”) evaluated the current SCI Drug and Alcohol Abuse Prevention Program (“DAAPP”) for its application and enforcement at each campus, the notification process, the clarity, ease of use and effectiveness of the DAAPP, as well as collective statistical reporting of drug and alcohol violations at each campus over the prior two years. The Review culminated in recommendations of changes and additions to the DAAPP as well as to procedures at the campus in the administration of the DAAPP.

## 2022 BIENNIAL REVIEW COMMITTEE

The institution established a DAAPP Biennial Review committee that included employees from the campuses and the corporate team, representing a variety of departments that SCI students interact with during their academic career. The entire review committee is listed below:

LOCATION	FIRST NAME	LAST NAME	POSITION
Austin	Eric	Andrews	Instructor
Austin	Caitlyn	Whitten	Registrar
Brownsville	Elizabeth	Brown	Finance Specialist
Brownsville	Andres	Olvera	Admissions Advisor
Corpus Christi	Kasey	Terrell	Instructor
Corpus Christi	Maria	Castaneda	Finance Specialist
Harlingen	Kara	Alcocer	Finance Specialist
Harlingen	Stephanie	Chavez	Academic Advisor
Pharr	Juan	Garcia	Instructor
Pharr	Jessica	Rodriguez	Admissions Advisor
Waco	Dillanger	Sylva	Career Services Coordinator
Waco	Kennan	McMillan	Registrar
Corporate	John	Bender	Corporate Legal Specialist
Corporate	Jody	Cohen	Vice President of Compliance
Corporate	Christopher	Burges	Director of Compliance
Corporate	Natalie	Keeton	Compliance Specialist

## GOALS OF THE SCI DRUG AND ALCOHOL ABUSE PREVENTION PROGRAM

The goals of the SCI Drug and Alcohol Abuse Prevention Program include:

- Educating about the health risks associated with the use of drugs and alcohol;
- Informing of applicable local, state, and federal laws regarding drugs and alcohol as well as SCI disciplinary actions that may be taken if there is a violation of the Drug and Alcohol Abuse Prevention Program;
- Providing information about available counseling and rehabilitation programs;
- Preventing the use of illicit drugs and alcohol abuse by students and employees ; and
- Promoting the well-being of all SCI students and staff.

## NOTIFICATIONS

Students are notified of the SCI Drug and Alcohol Abuse Prevention Program (DAAPP) and that all SCI campuses are drug- and alcohol-free by means of:

- Posting on the SCI website as part of the Annual Security Report and posted separately,
- In an e-mail with the attached DAAPP document sent annually,
- Provided to and acknowledged as received by every new student during the enrollment process, and
- Inclusion in the SCI School Catalog.

The Human Resources department notifies all employees of the SCI Drug and Alcohol Abuse Prevention Program (DAAPP) and that all SCI campuses are drug- and alcohol-free by means of:

- Providing as part of the new hire paperwork,
- In an e-mail with the attached DAAPP document sent annually,
- Posting on the SCI employee intranet site,
- Posting on the SCI website as part of the Annual Security Report and posted separately, and
- Inclusion in the SCI School Catalog.

Further, the DAAPP may be distributed on a case-by-case basis as deemed necessary as part of remediation processes for infractions of the student and employee codes of conduct.

## STATISTICAL REPORTING

SCI does not have in-residence students or dormitories or athletic programs, and many students attend virtual classes; therefore, there is a low incidence of drug and alcohol abuse at the campus locations.

### Drug and Alcohol Prevention Program Violations

The number of drug or alcohol-related violations occurring on campus or as part of an SCI activity, as reported by location:

LOCATION	ON-CAMPUS				OFF-CAMPUS ACTIVITIES			
	2020		2021		2020		2021	
Austin	Drug	0	Drug	0	Drug	0	Drug	0
	Alcohol	0	Alcohol	0	Alcohol	0	Alcohol	0
Brownsville	Drug	0	Drug	0	Drug	0	Drug	0
	Alcohol	0	Alcohol	0	Alcohol	0	Alcohol	0
Corpus Christi	Drug	0	Drug	0	Drug	0	Drug	0
	Alcohol	0	Alcohol	0	Alcohol	0	Alcohol	0
Harlingen	Drug	0	Drug	0	Drug	0	Drug	0
	Alcohol	0	Alcohol	0	Alcohol	0	Alcohol	0
Pharr	Drug	0	Drug	0	Drug	0	Drug	0
	Alcohol	0	Alcohol	0	Alcohol	0	Alcohol	0
San Antonio North	Drug	0	Drug	0	Drug	0	Drug	0
	Alcohol	0	Alcohol	0	Alcohol	0	Alcohol	0
San Antonio South	Drug	0	Drug	0	Drug	0	Drug	0
	Alcohol	0	Alcohol	0	Alcohol	0	Alcohol	0
Waco	Drug	0	Drug	0	Drug	0	Drug	0
	Alcohol	0	Alcohol	0	Alcohol	0	Alcohol	0
Corporate Office	Drug	0	Drug	0	Drug	0	Drug	0
	Alcohol	0	Alcohol	0	Alcohol	0	Alcohol	0

### Drug and Alcohol Prevention Program Internal Sanctions Imposed

The number of sanctions imposed by SCI because of a drug or alcohol-related violation occurring on campus or as part of an SCI activity, as reported by location:

LOCATION	ON-CAMPUS				OFF-CAMPUS ACTIVITIES			
	2020		2021		2020		2021	
Austin	Drug	0	Drug	0	Drug	0	Drug	0
	Alcohol	0	Alcohol	0	Alcohol	0	Alcohol	0
Brownsville	Drug	0	Drug	0	Drug	0	Drug	0
	Alcohol	0	Alcohol	0	Alcohol	0	Alcohol	0
Corpus Christi	Drug	0	Drug	0	Drug	0	Drug	0
	Alcohol	0	Alcohol	0	Alcohol	0	Alcohol	0

Harlingen	Drug	0	Drug	0	Drug	0	Drug	0
	Alcohol	0	Alcohol	0	Alcohol	0	Alcohol	0
Pharr	Drug	0	Drug	0	Drug	0	Drug	0
	Alcohol	0	Alcohol	0	Alcohol	0	Alcohol	0
San Antonio North	Drug	0	Drug	0	Drug	0	Drug	0
	Alcohol	0	Alcohol	0	Alcohol	0	Alcohol	0
San Antonio South	Drug	0	Drug	0	Drug	0	Drug	0
	Alcohol	0	Alcohol	0	Alcohol	0	Alcohol	0
Waco	Drug	0	Drug	0	Drug	0	Drug	0
	Alcohol	0	Alcohol	0	Alcohol	0	Alcohol	0
Corporate Office	Drug	0	Drug	0	Drug	0	Drug	0
	Alcohol	0	Alcohol	0	Alcohol	0	Alcohol	0

### Drug and Alcohol Prevention Program External Sanctions Imposed

The number of sanctions imposed by SCI because of a drug or alcohol-related violation occurring on campus or as part of an SCI activity, as reported by location:

LOCATION	ON-CAMPUS				OFF-CAMPUS ACTIVITIES			
	2020		2021		2020		2021	
Austin	Drug	0	Drug	0	Drug	0	Drug	0
	Alcohol	0	Alcohol	0	Alcohol	0	Alcohol	0
Brownsville	Drug	0	Drug	0	Drug	0	Drug	0
	Alcohol	0	Alcohol	0	Alcohol	0	Alcohol	0
Corpus Christi	Drug	0	Drug	0	Drug	0	Drug	0
	Alcohol	0	Alcohol	0	Alcohol	0	Alcohol	0
Harlingen	Drug	0	Drug	0	Drug	0	Drug	0
	Alcohol	0	Alcohol	0	Alcohol	0	Alcohol	0
Pharr	Drug	0	Drug	0	Drug	0	Drug	0
	Alcohol	0	Alcohol	0	Alcohol	0	Alcohol	0
San Antonio North	Drug	0	Drug	0	Drug	0	Drug	0
	Alcohol	0	Alcohol	0	Alcohol	0	Alcohol	0
San Antonio South	Drug	0	Drug	0	Drug	0	Drug	0
	Alcohol	0	Alcohol	0	Alcohol	0	Alcohol	0
Waco	Drug	0	Drug	0	Drug	0	Drug	0
	Alcohol	0	Alcohol	0	Alcohol	0	Alcohol	0
Corporate Office	Drug	0	Drug	0	Drug	0	Drug	0
	Alcohol	0	Alcohol	0	Alcohol	0	Alcohol	0

### REVIEW OF SANCTIONS

The sanctions imposed by SCI due to a violation were reviewed and found to be somewhat inconsistent with SCI's DAAPP. It may be possible that there were one or two suspected violations during the review period that were not identified as such and subsequently were not reported. The committee made several recommendations to address the lack of understanding and process.

Additionally, some externship sites require SCI students to complete a drug screening before starting their externship. If a student fails a drug screening as part of this process, the student would be dismissed from school. This has not occurred in the reporting years included in this review.

## DAAPP ASSESSMENT

Based on the review of the past two years by the Biennial Review Committee, several areas were noted as areas of favorable compliance and other areas were noted as areas that needed improvement.

### Favorable Compliance

- SCI has and maintains a Drug and Alcohol Abuse Prevention Program,
- The Biennial Review Committee includes campus and corporate employees representing a diversity of departments,
- The Biennial Review Committee unanimously agrees that the DAAPP, as written, is easily understood by our students and staff,
- On- and off-campus SCI events and activities are drug and alcohol free,
- Staff members are actively engaged, care about students, and utilize a student-centered approach in addressing drug and alcohol concerns,
- The culture of SCI is to encourage a high level of communication between staff and students resulting in a heightened awareness of student behavior,
- Staff are required to contact students when they miss class,
- The SCI Drug and Alcohol Abuse Prevention Program is discussed at new student orientation and is clearly written and easy to understand, and
- Employee Assistance Program (EAP) resources are made available to staff and faculty, including resources to assist with depression and dependency on drugs or alcohol.

### Compliance Concerns

- The student population is a mix of commuter and virtual learners, which makes it challenging to track incidents and behaviors of students,
- Some campuses are located near areas that present specific concerns raised during the Biennial Review:
  - The Austin main campus is located near a major transportation hub where large numbers of homeless people and vagrants gather, and where there is suspected drug and alcohol usage,
- The long-term COVID-19 pandemic has created enduring additional stress on individuals, stress that may lead to mental health issues or drug and alcohol abuse dependencies,
- The COVID-19 pandemic precipitated an unexpected shift to online learning, even for students enrolled in on-campus programs, decreasing in-person interaction with students. The lack of proximity and face-to-face contact may increase the risk that signs of alcohol or drug abuse will not be identified,
- Processes are unclear as to what steps to take if a drug or alcohol policy breach or abuse is suspected,
- Inconsistent documentation of campus alcohol- and drug-related activities and programs make it challenging to accurately capture all prevention program efforts, and
- Employee incidents and sanctions related to alcohol and drug violations of related laws and campus policies should be reviewed to determine if expanded prevention programs and response strategies are needed.

## RECOMMENDATIONS

SCI acknowledges the importance of a drug and alcohol abuse prevention program and the need to develop effective programs and policies to mitigate this issue. The Biennial Review Committee recommends the following items for implementation before the next review period:

1. Provide drug and alcohol abuse awareness training to employees.
2. Implement an annual survey asking staff and students about their knowledge of the DAAPP, how to access available resources, and how to address program breaches.
3. Provide DAAPP information during new student and employee orientations.
4. Provide training on how to advise students about drug and alcohol abuse and resources available.

5. Improve the means for tracking and monitoring sanctions for violations of alcohol or drug policies across locations to ensure equity in enforcement and sanctions,
6. Train employees on how to address drug and alcohol incidents or suspected incidents.
7. Add resources for Al-Anon/Alateen meetings or information for additional support if a family member is experiencing drug- and alcohol-related issues.
8. Provide a link to students in the learning management system (Moodle) to DAAPP resource information.
9. Develop a robust and structured reporting mechanism for drug- and alcohol-related incidents.
10. Conduct outreach to local police departments to obtain related crime statistics in the geographic vicinity of each campus location.
11. Distribute annual notification of the DAAPP as a separate notification rather than embedded in the annual security notification.
12. Directing students to the DAAPP policy is insufficient notification. Other means of distribution such as direct mail, sending as an attachment via email, or posting in the learning management system should be considered. Isn't this addressed in the items above? Repetitive?
13. Update the student code of conduct in the catalog to mirror the current policy regarding drugs and alcohol.
14. Increase specialized drug and alcohol abuse awareness campaigns and programming.
15. Regularly and consistently review for consistency of the violations and related sanctions.
16. Produce the next Biennial Review Report in compliance with the Drug-Free Schools and Communities Act no later than December 31, 2024.

## CONCLUSION

Southern Careers Institute compiled this 2022 Biennial Review report provided for review by the Campus Director at each SCI Campus. SCI meets the compliance requirements set forth by the Drug-Free Schools and Communities Act of 1989. The institution has an established Drug and Alcohol Abuse Prevention Program, committing to providing annual notifications of the DAAPP to students and employees, offering information about education, prevention, and intervention services, enforcing the DAAPP standards including imposing sanctions on violations of the standards of behavior, and conducting biennial reviews of the effectiveness of its programs and sanctions enforcement. SCI will continue to assess, modify, and pursue excellence of institutional efforts to further its intentional and goals-driven approach to promoting and enhancing the safety, health, and welfare of its students and employees.

Southern Careers Institute has conducted a Biennial Review of its Drug and Alcohol Abuse Prevention Program "DAAPP". The period of review is from January 2020 through December 2021. The review concluded May 2022.

The Biennial Review Report is maintained by the Compliance Department.

*The signatures below certify that the information provided in this report has been reviewed and is an accurate representation of the Review Committee's assessment, findings, and recommendations.*

SCI President Signature:		Date:	6/6/22
SCI President Print Name:	Nikki England		
CEO Signature:		Date:	6/6/22
CEO Print Name:	Jacob Mayhew		