



Bryan University Tempe

Drug and Alcohol Education Prevention Program (DAAPP) Biennial Review December 2015

Biennial Review of Bryan University's Drug and Alcohol Education Prevention Program

Bryan University believes that student success and achievement requires vigilance and effort on part of the University to promote healthy living and learning, both on-campus and online. We affirm that we have a role in promoting an environment conducive to education and that actively discourages drug and alcohol abuse. We commit to prevention, development of student conduct, and effective intervention for students at risk for these behaviors. The Drug Free Schools and Campuses Regulations (34 CFR Part 86) of the Drug-Free Schools and Communities Act (DFSCA) require an institution of higher education to certify it has adopted and implemented programs to prevent the abuse of alcohol and use or distribution of illicit drugs both by students and employees, both on-campus, online, and as any part of institutional activities. Bryan University certifies that it has adopted and implemented programs to prevent the abuse of alcohol and the use or distribution of illicit drugs by student and employees both on its premise and as a part of any of its activities. Bryan University acknowledges its obligation to conduct a biennial review of compliance with the Drug-Free Schools and Communities Act, and authorized an administrative review to be conducted in December of 2015 covering the prior two years, to determine if the University fulfills the requirements of these Federal Regulations. The intent of this document is to summarize and evaluate the effectiveness of policies and programs and to measure enforcement consistency.

The scope of Bryan's DAAPP policy covers residential locations in addition to all our online students. Policies and procedures are deployed equally to both residential and online students. Bryan does not offer any campus housing.

- Los Angeles: Bryan currently occupies approximately 10,000 square feet at 3580 Wilshire Blvd. STE 400 in Los Angeles California. This location consists of residential student classrooms, faculty offices and administrative offices. Bryan does not offer any campus housing. Students visit campus to attend classes.
- Tempe: Bryan currently occupies approximately 40,000 square feet at 350 West Washington Street, STE 100, Tempe Arizona. This location consists of residential classrooms, faculty offices and administrative offices as well as all online operations. Students visit campus to attend classes.

Bryan University has organized its 2015 biennial review as follows:

1. Taskforce Committee;
2. Description of Bryan's DAAP program elements;
3. Statement of program goals and review of goal achievement;
4. Procedures for annually distributing the DAAPP;
5. Copies of policies distributed to students and employees; and
6. Summary of strengths and weaknesses;
 - a. Review of sanction enforcement consistency
 - b. Review of policy and program effectiveness



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7. Recommendations for revision.

Taskforce Committee:

The Bryan University executive council is tasked with the DAAPP biennial review as follows:

- Members: Eric Evans, Tempe Campus President, John Kolacinski, Los Angeles Campus President, Dave Rogers, CFO, Roxane Romero, Regional Director of Financial Aid, John Ledesma, V.P. Enrollment Management, Julie Phillips, VP Employee Excellence, Jennifer Brock, V.P. Academic Affairs, Kurt Hayes, Executive Director of Curriculum and Student Outcomes, Bill Hamilton, Vice Chancellor.
- Process: The review was managed within Bryan's project management software called Wrike as well as executive council. Evidence of review is maintained within Wrike and as meeting minutes.

Description of Bryan's DAAP Program Elements:

The following is the reviewed and revised 2016 policy that will go into effect in January for distribution, which was enhanced based on this biennial review.

2016 Revised Policy

Bryan University is committed to having a drug-free and alcohol-free campus that prohibits at a minimum, the unlawful possession, use, or distribution of illicit drugs and alcohol by students and employees.

Standards of Conduct

Use of illegal drugs, and the illegal use of alcoholic beverages, is identified as "conduct that adversely affects the community." University regulations prohibit any unlawful possession, use, distribution, or sale of alcohol and other drugs by University students, faculty, staff, or guests of the University, on University property and at all University sponsored events.

Bryan University students and employees are also prohibited from the illegal use of drugs or alcohol whether on or off campus.

The legal age for the consumption of alcohol is 21 years of age. Any underage student consuming alcohol is violating standards for student conduct. Additionally, excessive use of alcohol can lead to additional violations, such as driving while intoxicated or public intoxication.

Disciplinary Sanctions



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The penalties for misconduct range from admonition to expulsion. Students who have violated this policy or the Student Code of Conduct (outlined in the Catalog) will be referred to the V.P. of Academic Affairs. Examples of sanctions include:

1. Written warning
2. Probation
3. Fines
4. Restitution
5. Suspension
6. Expulsion

Employees that are not in compliance with this policy (or the drug policies outlined in the employee manual) will be referred to human resources and may be suspended, lose wages, or terminated.

In addition, known student or employee violations, if required by state law, will be brought to the attention of local law, state, and or federal enforcement agencies.

Disciplinary sanctions may also include completion of an appropriate rehabilitation program.

In addition to University imposed sanctions, local law, state, and federal enforcement sanctions may also be imposed, including, but not limited to the following:

- **Tempe Arizona Campus** - In addition to the Federal Laws, the State of Arizona has its own laws dealing with controlled substances. It is illegal for persons under the age of 21 to possess alcoholic beverages with the intent to consume them, and for anyone to falsify or misrepresent his or her age to another person under that age of 21. Arizona law (ARS & 8-323) provides for the following penalties for a minor who purchases, possesses or consumes spirituous liquor:
 1. Probation
 2. A juvenile court hearing
 3. Driving privileges suspended for 180 days
 4. Attendance at a counseling for education program
 5. A fine up to \$500
 6. Community service work

Arizona law also makes it a misdemeanor to be intoxicated in public and cause a public disturbance, or to be intoxicated and endanger the safety of another person or of property. This carries a fine of up to \$1000 and up to 90 days imprisonment. Penalties for drug possession under Arizona law range from a minimum of probation to a maximum of 10 years in prison and a \$150,000 fine.

Information is given for first offenses only as repeat offenses carry progressively greater sanctions. Trafficking (selling) any illegal drugs, excluding alcohol, are all felonies.

- **Los Angeles Campus** – Underage consumption and or possession of alcohol is considered a misdemeanor, with driving privileges suspended for one year and \$125 fee. If found with an open container of alcohol in motor vehicle, it's a misdemeanor and \$390 fine. Driving under the influence is a misdemeanor with 48 hours to 6 months jail time and up to \$1000 in fines. If



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found in possession of narcotics, instant felony with two years to 10 years jail time plus fines. Addition offenses penalties increase.

- **Federal** – Federal law penalizes the unlawful manufacturing, distribution, use, sale, and possession of controlled substances. The penalties vary based on many factors, including the type and amount of the drug involved, and whether there is intent to distribute. Federal law sets penalties for first offenses ranging from less than one year to life imprisonment and/or fines into \$10 million. Penalties may include forfeiture of property, including vehicles used to possess, transport, or conceal a controlled substance; the denial of professional licenses or Federal benefits, such as student loans, grants, and controls; successful completion of drug treatment program, community service; and ineligibility to receive or purchase a firearm. See Federal Controlled Substances Act at 21 USC 800.

Reporting: Potential employee infractions must be reported to Julie Philips, the V.P. of Employee Excellence via email at Julie.phillips@bryanuniversity.edu. Potential student infractions must be reported to the V.P. of Academic Affairs, Jennifer Brock via email at Jennifer.brock@bryanuniversity.edu or either may be reached via phone at 602-384-2555.

Health Risks

Specific serious health risks are associated with the use of alcohol and illicit drugs. Some of the major risks are listed below.

General Risks:

- Physical and mental dependence
- Memory Loss
- Violent behavior, aggressive acts, and angry feelings
- Headaches
- Nausea or vomiting
- Muscle weakness
- A drug tolerance
- Liver, lung, and kidney problems
- Brain damage
- Hallucinations, tremors and convulsions
- Hyperactivity or Sluggish behavior
- Poor academic performance
- Unwanted sexual activity (i.e. date rape)
- Sexually transmitted diseases, including HIV/AIDS
- Unwanted pregnancy
- Impact on future career prospects
- Adverse effects from withdrawal

Specific Risks:



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Alcohol and Other Depressants (barbiturates, sedatives, tranquilizers) – Addiction, accidents as a result of impaired ability and judgment, alcohol poisoning, overdose when used with other depressants, damage to a developing fetus, heart and liver damage.

Marijuana – Impair short-term memory, thinking, and physical coordination. Can cause panic reaction and increase risk of lung cancer and emphysema. Can interfere with judgment, attention span, concentration, and overall intellectual performance. Impairs driving ability. May cause psychological dependence and compromise the immune system.

Cocaine – Additional cardiovascular system damage including heart attack, brain damage, seizures, lung damage, severe depression, paranoia, psychosis. Similar risks are associated with other stimulants, such as speed and uppers.

Nicotine – Tobacco smoke contains thousands of chemical compounds, many of which are known to cause cancer. Nicotine, which is a central nervous system stimulant, produces an increase in heart and respiration rates, blood pressure, adrenaline production and metabolism. People can rapidly become physically and psychologically dependent on tobacco. Compromises the immune system.

Inhalants – Inhalants are a diverse group of chemicals that easily evaporate and can cause intoxication when their vapors are inhaled. Most inhalants are central nervous system depressants. Use of these drugs slows down many body functions. High doses can cause severe breathing failure and sudden death. Chronic abuse of some of these chemicals can lead to irreversible liver damage and other health problems.

Prescription Drug Abuse – Adverse reactions, dependency, withdrawal, and overdose.

Counseling and Treatment

A variety of resources exist for alcohol and other drug prevention education, counseling and referral. Employees may contact the Bryan University Human Resources Department at 888-768-6861, Monday through Friday from 8am PST to 5pm PST. Students may contact Student and Alumni Outreach also at 888-768-6861, Monday through Thursday from 6am PST to 8pm PST.

For those individuals that require assistance outside of the aforementioned operating hours, or for online students and employee that need assistance from local state services, Bryan University has partnered with Wellconnect, which is available 24/7 at 866-640-4777. Students or employees can also assess additional Wellconnect online counseling and treatment resources at www.studentlifetools.com using the dedicated Bryan access code of S784.

Wellconnect offers drug and alcohol counseling, treatment options, rehabilitation programs and re-entry programs. We encourage any student, faculty or staff member to fully utilize this exceptional service. In addition, Wellconnect can assist with other concerns such as abuse, student life skills, study best practices etc.



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Lastly, in the event of an emergency, please dial 911 or these local assistance numbers:

- Los Angeles
 - Police Department – 877-275-5273
 - California Access to Recovery Effort (CARE) 866-350-8773
 - California Department of Alcohol and Drug Prevention – 800-879-2772
 - Alcoholics Anonymous – 909-825-4700
- Tempe Local Resources:
 - Police Department – 480-350-8311
 - Alcoholics Anonymous – 602-264-1341
 - Assisted Recovery Centers of America – 602-264-7897
 - Phoenix House – 1-800-DRUG-HELP
 - Nationwide Addition Assistance Helpline – 1-800-559-9503

Policy Management

This policy will be distributed to each new student and each new employee within their respective enrollment packets during new student and new employee orientation. Students and employees will confirm receipt and acknowledge understanding of this policy, with copies maintained in the employee and student files, respectively. In addition, all employees and students will receive an additional copy in writing to ensure completeness of distribution every January. Lastly, a copy of this policy will be hosted on the Bryan University website (<http://bryanuniversity.edu/about/consumer-info/home/>), accessible at all times.

Bryan University performs a summary review each December in preparation for any non-material needed revisions for the January release. An exhaustive review, with an associated report, will be conducted biennially, and will include but not be limited to review of the policy, review if infractions, review of state's resources, etc.

Statement of Program Goals and Review of Goal Achievement

Bryan University has established the following goals surrounding its DAAPP. Bryan, historically has not had any reportable incidents due to 93% of students attending 100% online. Our residential students in Tempe and Los Angeles only visit the campus to attend class and then return home, as such Bryan does not have a typical residential student environment wherein issues are more likely to occur. As such, our goals are more focused on educating and training to ensure a derived benefit regardless of where our students may be in both their personal, professional, or academic lives. Current goals are:

- To increase awareness of drug and alcohol abuse through broad distribution to all employees and students
- To educate students and employee on the risks of drug and alcohol abuse, along with the educational and or employment consequences



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- To educate around support networks and solutions to escape from addictions

Measurement of goal achievement. We measure evidence of goal achievement for our situation as follows:

- All new students that enroll, sign our DAAPP as part of their enrollment process. In reviewing this measure, there were no issues found. All new students are signing the policy.
- Each January, all existing student are issued that current year's DAAPP via DocuSign, with signature required. In assessing this policy, we noted that there are students that receive the policy, but don't sign it.
 - Action Item: include signing of the policy as an assignment with every course that initiates in Q1 of each year to increase acknowledgement. Go-live has been set to Q1 of 2016 for this enhancement
- Review Wellconnet utilization report. Based on comparative school, Wellconnect reported average use, which evidences students and employees are taking advantage of resources. Review of the Wellconnect quarterly report showed an average utilization of 10%. Service requests were predominately surrounding child care, housing, financial and emotional well-being.
- Video based training – In November, 2015, Bryan signed a contract with Compliance point to issue video based training to students around Title IX as well as DAAPP. The goal was to enrich our DAAPP policy training thru other medians than just paper. Review of the initial results of students completing the course are comparable to industry. Team determined to let this have more time before we enhance it.

Procedures for Annually Distributing the DAAPP

Bryan University employs the following strategies on DAAPP distribution and acknowledgement. A copy of the 2015 DAAPP policy has been included as Appendix A.

1. Student distribution:
 - a. Bryan University requires all new students to sign and acknowledge our DAAPP at time of enrollment. If the DAAPP is not signed, the student is not allowed to enroll. Copies of the signed DAAPP are included in the student file.
 - b. Existing student body: Bryan issues its annual DAAPP via DocuSign for existing students as well. DocuSign requires the student to sign and acknowledge understanding and compliance with the DAAPP. Copies of signed DAAPP policies are retained within each student file. We selected DocuSign as our methodology for distribution as we can equally distribute to residential and online students, while also producing an artifact that shows who really received and reviewed.
2. Employee distribution: Bryan issues the DAAPP to all employees also via DocuSign. Employees are required to sign. Signed documents are routed back to HR for filing within each employee file.



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3. Enrichment measures
 - a. A downloadable and printable copy is maintained at all times on the Bryan University website as follows: <http://bryanuniversity.edu/about/consumer-info/home/>
 - b. Bryan signed a contract with Compliance Point to issue video based training to all students and employees to allow for deployment of different types of training beyond just reading a policy. Please refer to Appendix B for our current results.

Summary of Strengths and Weaknesses:

The following is the committee's results of our biennial review:

1. Review of policy and program effectiveness: Based on our review of the policies and procedures, the following strengths and areas for improvement were identified:
 - a. Strengths:
 - i. Use of Docusign provides strong evidence of receipt and acknowledgement
 - ii. Policy equally covers topics for both residential and online students
 - iii. No formally reported incidents
 - iv. Average use of Wellconnect
 - v. Initial strong participation in Compliance Point
 - vi. Incorporating as part of enrollment
 - b. Areas for Improvement:
 - i. Existing students are not signing the document in all cases. New students do sign the policy as it's required for enrollment. Need to tie completion of existing student DAAPP signing to something more meaningful, such as a course assignment each calendar Q1 of every year to increase participation
 - ii. Found some spelling errors in the policy document. They have been corrected for the 2016 Q1 release.
 - iii. Add additional verbiage on how to report possible student or faculty infractions. Zero infractions were documented, primarily based on the nature of Bryan's online and commuter campus deployment, however with increased training around how to report, we may find more opportunity to assist.

4. Review of sanction enforcement consistency. The committee met with Julie Phillips, responsible for maintaining a log of employee infractions and Jennifer Brock, responsible for maintaining a log of student infractions and noted no recorded infractions for the 2013, 2014 and 2015 years per the table below. We believe this is primarily driven by the nature of Bryan's educational experience wherein 95% percent of our student body is 100% online and remaining 5% that attend either Los Angeles or Tempe, attend school only for classes. Bryan does not have student housing, nor does it have a traditional campus life approach, as students leave the campus once



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classes are completed. That being said, a recommendation is still to enhance training around how to report possible infractions along with enhancing contact information in the 2016 policy.

Location	Incident			Student/Employee	Outcome
	2013	2014	2015		
Online	0	0	0	N/A	N/A
Tempe	0	0	0	N/A	N/A
Los Angeles	0	0	0	N/A	N/A

Recommendations for improvement in 2016:

The following is a summary of the recommendations for improvement that have been identified throughout this assessment:

1. Add additional contact information for Julie and Jennifer to increase incident reporting;
2. Tie existing student signature of DAAPP, which occurs Q1 of each calendar year, to an assignment within each course or some similar mechanism to increase signature percentages on existing students; and
3. Continue to monitor success of Compliance Point video based deployment.