



**USC Union**

**Palmetto College Campus**

**Campus Committee Members**

**Dr. Randy Lowell, Associate Dean of Academic and Student Affairs**

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**Biennial Review: Academic Years 2016-2017 and 2017-2018**

**Drug-Free Schools and Campuses Regulations [Edgar Part 86]**

**March 16, 2020**

## **Introduction/Overview**

*The Higher Education Act of 1965, as amended by the Drug-Free Schools and Communities Act of 1989, requires that any institution of higher education that receives federal financial assistance must adopt and implement a program to prevent the use of illicit drugs and alcohol abuse by students and employees ([20 U.S.C. 1145g—Drug and Alcohol Abuse Prevention](#)).*

*Pursuit to this requirement, the Department of Education General Administrative Regulations (EDGAR), 34 C.F.R. Part 86 (Part 86), mandate that colleges and universities: 1) annually distribute specified drug and alcohol prevention information to students and employees (“annual notification”), and 2) conduct a biennial review of their drug and alcohol prevention programs[1].*

University of South Carolina Union has a long-standing commitment to alcohol and other drug prevention. USC Union has regularly used national tools to measure our progress and to select and implement best practices. We have developed this inventory and recommendations in the spirit of continuous improvements of both our efforts and compliance.

[1] These regulations were originally published in the Federal Register, Vol. 55, No. 159, Aug. 16, 1990, pp. 33580–33601, and are now available at <https://ifap.ed.gov/regcomps/attachments/86.pdf> (accessed on December 2, 2016).

## **Biennial Review Process**

A committee from each campus of USC Palmetto College was recruited to serve as a biennial review work group. Committee members included faculty and staff from the Office of Academic and Student Affairs, Safety and Security, and Human Resources. Information and data from these offices and others such as Athletics and University 101 were consulted and used. The committees on each of the Palmetto College campuses have met several times between November 2019 and March 2020. Our initial objectives were threefold: 1) to gather information and determine the effectiveness of AOD prevention/education efforts, 2) to gather information about enforcement efforts, and 3) to determine how the annual notification is being conducted. Our findings are synopsised in the first half of this report; appendices are included with copies of major relevant documents. In the future, the biennial review work groups will use this report’s findings and goals to measure progress. Lastly, the committee developed a list of four overarching recommendations from the next biennium. Biennial Reviews will be kept on the four Palmetto College campuses at two central locations: the Office of Academic and Student Affairs and the respective office where Safety and Security functions are managed. They will also be archived online on the websites of each of the four campuses.

## **Annual Policy Notification Process**

### ***Employees***

The employee policy notification is required to have the following elements:

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 its property or as part of any of its 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
5. A clear statement that the institution will impose disciplinary sanctions on students and employees (consistent with 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; a disciplinary sanction may include the completion of an appropriate rehabilitation program.

This required content is contained in policy HR 1.01, Drug-Free Workplace, although the health risks section is not very explicit. Policy language notes the practice of distribution to new employees and annually to continuing employees.

During this biennium, notification of our Drug-Free Workplace policy (HR 1.01) to new employees and annually to continuing employees occurred in multiple ways to ensure compliance:

- In our New Employee Orientation;
- Temporary employees who do not attend University Orientation are informed through the USC Human Resources Onboarding Process upon hire and review of all applicable University/HR policies;
- Through the University's Clery Act Annual Security and Fire Report under the "ALCOHOL AND DRUG POLICIES AND PROGRAMS TO PREVENT ALCOHOL AND DRUG ABUSE" section.

Copies of the Annual Security report are included in Appendix A.

## **Students**

The student policy notification is required to have the following elements:

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 its property or as part of any of its 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
5. A clear statement that the institution will impose disciplinary sanctions on students and employees (consistent with 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; a disciplinary sanction may include the completion of an appropriate rehabilitation program.

The work group was not able to identify a single policy that is distributed to USC Union students which is inclusive of all required elements of Edgar 86. Specifically, there is not a publication or policy which includes the health risks associated with the use of illegal drugs and the abuse of alcohol.

## **Inventory of Policies, Policy Enforcement & Programs**

The work group gathered information from across campus on student behavioral data, policy and law enforcement, and prevention, education, and intervention programs regarding alcohol and other drugs. We organized this inventory into four major categories:

- A. Student Alcohol & Other Drug Behavior Data
- B. Policy Inventory
- C. Policy Enforcement Data
- D. Prevention Programming

### ***A. Student Alcohol & Other Drug Behavior Data***

Leadership in Student Affairs and Safety and Security developed a matrix of all data that is collected related to student alcohol and drug use. Incident data and data related to students with conduct violations is also included.



2. Annual Security Report: Safety and Security Offices (2016-2018)

**Criminal Arrests for Violations for Illegal Weapons, Drugs, and Alcohol**

Arrests for weapons, drugs, and alcohol	Total on campus			Non-campus			Public Property		
Illegal weapons possession	0	0	0	0	0	0	0	0	0
Drug law violations	0	0	0	0	0	0	0	0	0
Liquor law violations	0	0	0	0	0	0	0	0	0

**Disciplinary Referrals for Illegal Weapons, Drugs, and Alcohol**

Disciplinary Referrals for weapons, drugs, and alcohol	Total on campus			Non-campus			Public Property		
Illegal weapons possession	0	0	0	0	0	0	0	0	0
Drug law violations	0	0	0	0	0	0	0	0	0
Liquor law violations	0	0	0	0	0	0	0	0	0

*D. Prevention and Early Intervention Programming*

The Office of Academic and Student Affairs and the Office of Safety and Security regularly sponsor programming aimed at the prevention of the abuse of alcohol and other drugs on the campus and in the community. Education about university policies as well as prevention communication are shared widely through new student orientation, University 101, and other appropriate resources. When available and applicable, resources from and referrals to health organizations in the community are involved and included. Public health practice and research supports the effectiveness of mutually reinforcing efforts at all levels with evidence that policy and community-based interventions are particularly effective.

**Recommendations for future implementation**

*Recommendations for on-campus alcohol and drug prevention initiatives:*

- The university should develop and implement clear, consistent prevention communication messages that align with the institution’s policies and practices and should be void of gaps and duplications.

*The committee affirms this as a major recommendation. The institution sends a consistent set of linked messages to incoming students from orientation to University 101. Intentional examination and planning of future messages can deepen and reinforce efforts.*

- The university should increase efforts to change norms about drinking by requiring training for all faculty advisors and student organizations, to include all campus groups. This initiative should include the development of faculty training materials in addressing alcohol and drug issues and concerns during academic advising.

*We affirm the recommendation for correcting unhealthy social norms. While students should be the primary target of a normative campaign, addressing the faculty and staff role in shifting cultural beliefs and proactively engaging faculty and staff in the campaign can lower resistance and increase saturation of the messages.*

- The university should develop a systematic approach to address student substance use issues by providing a full continuum of alcohol and other drug university services to include prevention, early identification, intervention, and referral to local health care provider.
- The university must understand that reshaping norms, culture, and behavior requires motivation and educational interventions to prepare the campus for change, skill building interventions to help members carry out new practice, and reinforcement/enforcement of the new structural changes. Institutional change occurs incrementally and over long periods of time. The university must be committed to these efforts for the long run in order to make sustainable changes.

*The university must continue to hold its position and partnerships through pushback in order to effect long-term change.*

*Recommendations for off-campus initiatives:*

- The university should initiate statewide lobbying efforts to reduce access and availability to illicit drugs and alcohol in hospitality districts surrounding the university and at student-attended events that include: reducing high alcohol retail outlet density; enforcing S.C. laws on drink specials, happy hours and hours of operation; limiting alcohol promotional messaging on social media; and strict enforcement on minimum age drinking laws. Lobbying efforts also should include support for developing independent funding sources that allow for state and local offices to function without relying on the cost of underage drinking/misbehavior. This initiative should include collaborating with the city and county officials to develop and enforce laws addressing sales, service practices and environmental design in areas where this illegal behavior might take place.

## **Recommendations for next Biennium**

After consideration of campus policy, program and behavior data and considering recent and evolving institutional initiatives, the committee highlights the following recommendations for the next biennium.

The institution needs to act on the Edgar 86 requirements for an annual student notification that is fully compliant. Other methods like electronically requiring content review before registration or an all student email would also meet requirements but be more cumbersome. Similarly, the Biennial Review process needs to be continued, with the next review filed by October 1, 2020. The review committee could continue as is or be appointed by the Chancellor of Palmetto College or the Dean (or designee) of the respective campus.

The major recommendations include:

1. Consistently communicate messages to the USC Union community and local community about high-risk drinking from pre-matriculation through alumni status, with a focus on supplementing messages beyond the end of the first semester,
2. Increase communication efforts to enhance and supplement policy enforcement,
3. Enhance current efforts to build consistent programs for the student body and a positive environment for non-drinking students,
4. Implement effective prevention strategies for high-risk students and groups.

Further, we recommend that the institution continue its momentum to “right size” its resource allocation toward alcohol and drug prevention efforts. These resources can be strategically brought to bear across enforcement, community relations, prevention, and health and safety campus partners.

## **Conclusion**

In conclusion, the committee hopes that our report will be received as a good faith review of the status of USC Union’s extensive alcohol and drug prevention efforts and a set of actionable goals and objectives for the next biennium. As we have neared the conclusion of our work, the Committee plans to adopt these recommendations as their strategic plan for the next two years to create a structured implementation strategy.



## Appendix