



**National
University**
Of Health Sciences

Biennial Review: 2022

Drug-Free Schools & Campuses Regulations [EDGAR Part 86]

National University of Health Sciences

Site Locations: Lombard, Illinois and Pinellas Park, Florida



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NATIONAL UNIVERSITY OF HEALTH SCIENCES

Drug-Free Schools and Campuses Regulations [EDGAR Part 86]

Alcohol and Other Drug Prevention Certification

The undersigned certifies NUHS has adopted and implemented an alcohol and other drug prevention program for its students and employees that, at a minimum, includes -

1. The annual distribution to each employee, and to each student who is taking one or more classes of any kind of academic credit (except for continuing education units), regardless of the length of the student's program of study, of:
 - 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.
 - A description of the applicable legal sanctions under local, State, or Federal law for the unlawful possession or distribution of illicit drugs and alcohol.
 - A description of the health risks associated with the use of illicit drugs and the abuse of alcohol.
 - A description of any drug or alcohol counseling, treatment or rehabilitation or re-entry programs that are available to employees and students.
 - 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.

2. A biennial review by the institution of its alcohol and other drug prevention comprehensive program to:
 - Determine its effectiveness and implement changes to its comprehensive alcohol and other drug prevention program and policies if they are needed.
 - Ensure that its disciplinary sanctions are consistently enforced.

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The Legal Status of Cannabis at NUHS

On January 1, 2020, the *Illinois Cannabis Regulation and Tax Act* went into effect. It is important for all members of the NUHS community to understand that the legalization of recreational and medical marijuana in Illinois, and medical marijuana in Florida, does not supersede the federal drug laws nor any existing NUHS policies barring cannabis from all University premises.

National University of Health Sciences is required to certify that it complies with the *Drug-Free Schools and Communities Act*, the *Drug and Alcohol Abuse Prevention Regulations*, and the *Drug-Free Workplace Act* to maintain a healthy learning and work environment and, also, to retain eligibility to participate in key federal funding programs such as student financial aid and institutional research. Consequently, the University prohibits possession, use, distribution, dispensation, sale, or manufacture of any cannabis, THC (tetrahydrocannabinol) or CBD (cannabidiol) related products or byproducts on University property (including, but not limited to outdoor spaces, classrooms, and residential halls) or as part of any University-sponsored activity.

The federal government regulates drugs through the *Controlled Substances Act* ([21 U.S.C. A 811](#)), making no distinction between medical or recreational cannabis as an illegal controlled substance. The *Illinois Compassionate Use of Medical Cannabis Program Act* (IL Statute: [Chapter 410, Section 130/1](#), et seq.), grants individuals possessing lawfully issued medical marijuana ID cards permission to use medical marijuana – but not without limitations. The Act states: “*Nothing in this Act shall prevent a university, college, or other institution of post-secondary education from restricting or prohibiting the use of medical cannabis on its property.*” In Florida, the law is known as the *Compassionate Use of Low-THC and Medical Cannabis Act* (FL Statute: [Title XXIX, Section 381.986](#), et seq.), also stipulates: “Medical use” means administration of the ordered amount of low-THC cannabis or medical cannabis. The term does **not** include the: possession, use, or administration of low-THC cannabis or medical cannabis by smoking, transfer to a person other than the qualified patient for whom it was ordered, use or administration of low-THC cannabis or medical cannabis on any form of public transportation, public place, place of employment, on the grounds of a preschool, primary or secondary school or on a school bus, in a vehicle, aircraft, or motorboat.

The National University of Health Sciences (NUHS) has a long-standing commitment to the support and maintenance of a drug-free environment for our students and employees. Thus, despite state laws legalizing medical or recreational cannabis, THC or CBD, these substances are still prohibited on NUHS property. *This fact is reflected in the NUHS Drug and Alcohol Abuse Prevention Policy and the contents of this 2022 Biennial Review.*

To review the *NUHS Drug and Alcohol Abuse Prevention Policy*, visit the University's website at: <https://www.nuhs.edu/about-us/human-resources/policies>

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1. Introduction

Overview of the Legal Requirements

The Higher Education Act of 1965, the Drug-Free Workplace Act of 1988 and the Drug-Free Schools and Communities Act of 1989 (DFSCA) and its implementing regulations at 34 C.F.R. Part 86, requires any institution of higher education that receives any form of federal funding to certify to the Secretary of Education that it has adopted and implemented a drug and alcohol abuse prevention policy (DAAPP) to prevent the unlawful possession, use, or distribution of illicit drugs and alcohol by students and employees. The Department of Education's regulations at 34 C.F.R. Part 86 requires that NUHS, as part of its drug & alcohol abuse prevention program (DAAPP) for students and employees, annually distribute the following information:

1. Standards of conduct that clearly prohibit 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 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 available drug and alcohol counseling, treatment, rehabilitation, or re-entry programs; and
5. A clear statement of the disciplinary sanctions that the University will impose on students or employees who violate these standards of conduct.

Purpose of the Biennial Review

In 2012, the Office of the Inspector General (OIG) for the U.S. Department of Education reported to the Office of Federal Student Aid (FSA) that the Department had failed to ensure compliance with the Part 86 requirements **from 1998 until June 2010**. In response to the OIG report, the FSA pledged to clarify its procedures and to train the *Clery Act* and *Title IV* reviewers to document whether institutions of higher education have complied with the Part 86 requirements.

Pursuant to the (EDGAR), 34 C.F.R. Part 86 requirements, National University of Health Sciences conducts a biennial review of its drug prevention program to determine its effectiveness, implement changes as needed, and ensure that the disciplinary sanctions are consistently enforced. The National University of Health Sciences fully supports the objectives of these laws and their related regulations. The University recognizes both alcohol and drug abuse as potential health, safety, and security problems and expects its students and employees to cooperate in maintaining a university environment free from the negative effects of alcohol and other drugs and to comply with all institutional policies related to drug and alcohol abuse prevention.

2. Biennial Review Process

Contributors to the Review Process

These individuals and departments contributed to the biennial review process:

- Yesenia Maldonado, Dean of Students, Office of Student Services
- Candace Passi, Dean: College of Allied Health Sciences & Continuing Education
- Andrew Wozniak, Director of Human Resources
- Tracy McHugh, Vice President for Academic Services
- Daniel R. Driscoll, Dean for Institutional Compliance

The Drug-Free Schools and Communities Act (DFSCA) requires that all educational institutions must conduct a biennial review of its drug and alcohol abuse prevention program in order to determine how effective the program is, and whether the institution needs to implement any changes to the program. Among other things, this requires the institution to determine the number of drug and alcohol-related violations and fatalities that occur on campus or as part of any institution-sponsored activity, and the number and type of sanctions imposed as a result of those drug and alcohol-related violations and fatalities. Also, the institution must ensure through its biennial review that any drug or alcohol related violations by students or employees resulting in sanctions are consistently enforced.

The National University of Health Sciences is equally committed to complying with these federal requirements as well as reducing the harm caused by drug and alcohol abuse at its educational sites and

within the communities it is privileged to serve.

Our faculty, staff & students achieve this through the University's wide-ranging and numerous forms of social outreach efforts, diverse service-learning programs inculcated into every degree or certification program offered by the University, and its long-standing tradition of pro-bono healthcare service at Veterans Administration hospital facilities.

3. Annual NUHS Policy Notification Process

Primary Distribution Method

As a requirement of these regulations, National University of Health Sciences ensures distribution of an unabridged copy of the Drug and Alcohol Abuse Prevention Policy (DAAPP) by electronic mail to all students, staff, and faculty on an annual basis. This process begins by harvesting the email address of every student enrolled (determined by credit-hour registration) in any program offered by the University. Likewise, the same information (a complete list of email addresses) is collected on all faculty and staff members using the active payroll records. Both collection methods ensure optimal accuracy of all the actively enrolled or employed individuals at the University. This process ensures that the institution actively distributes the required notification to every student and employee. Of equal importance, of course, is the reasonable assurance that this process is able to provide archived data as proof to a government agency (such as an audit by the Department of Education) that a substantive record of disseminating the (DAAPP) to students & employees has been kept.

This email is distributed before the first day of class, during New Student Orientation, at the beginning of each academic term or at the time a new faculty or staff member's employment becomes effective and undergoes New Employee Orientation. NUHS does not conduct a "recess" over the summer term. Classes for all its degree programs are offered every four months (for fifteen weeks) over the course of a year. However, late registrants into any program or any person hired by the University will be issued a personal copy of the DAAPP at the time they join the institution. Also, the University may send additional email notifications throughout the year if there are significant changes to the current policy in force or if significant resource information has been added to the DAAPP necessitating an additional redistribution to meet federal compliance mandates.

Content of the DAAPP for Students, Faculty and Staff

The content of the drug & alcohol abuse prevention program (DAAPP) annually distributed to students, faculty and staff contains the following information:

1. Standards of conduct that clearly prohibit 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 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 available drug and alcohol counseling, treatment, rehabilitation, or re-entry programs; and
5. A clear statement of the disciplinary sanctions that the University will impose on students or employees who violate these standards of conduct.

Procedure for Securing Additional Written Copies

Unabridged, printed copies of the Biennial Review will be available upon request from support personnel within the offices of the Executive Administrators (President & VP's), the Director (awozniak@nuhs.edu) in the Office of Human Resources, or the Dean of Students (ymaldonado@nuhs.edu) in the Office of Student Services.

NUHS Alcohol and Other Drug (AOD) Survey of Students and Employees

Since the 2016 Biennial Review, NUHS has used the Illinois Higher Education Center for Alcohol, Other Drug, and Violence Prevention survey. This allowed NUHS to avail itself of the opportunity to survey and compare the alcohol and other drug use among NUHS students against the alcohol and other drug use of a very large sampling (nationally) of college students using the CORE Alcohol and Drug survey. The CORE survey was developed to measure college students' alcohol and drug usage, attitudes and beliefs. All results are based on self-reported information from over 61,057 students at 118 institutions and provide key insight into students' perceptions of their own behaviors.

NUHS has administered separate "stand-alone" surveys to its student body and its employees (faculty &

staff) utilizing the CORE Alcohol and Other Drug surveys for students (used with two- and four-year institutions) and employees. After each survey was tabulated, the student survey reflected a 15% participation rate based upon the total number of students enrolled at NUHS (436) in the Fall of 2022. Likewise, the participation rate for the faculty and staff survey was 45.4% of the total number of 187 full-time (FT) and part-time (PT) employees during the Fall of 2022.

Students: Key AOD Survey Findings (15% response rate)

Alcohol: How often is it consumed?	
1.5%	Use alcohol daily
27.6%	Used alcohol in the past week (7-day prevalence)
36.9%	Used alcohol in the past month (30-day prevalence)
10.7%	Used alcohol in the past year (annual prevalence)
23.0%	Never used
89.3%	Didn't use alcohol this year

Figure 1

Marijuana: How often is it used?	
10.7%	Used marijuana daily
13.8%	Used marijuana in the past week (7-day prevalence)
9.2%	Used marijuana in the past month (30-day prevalence)
6.1%	Used marijuana in the past year (annual prevalence)
60.0%	Never used
93.9%	Didn't use marijuana this year

Figure 2

Cocaine: How often is it used?	
0%	Use cocaine daily
1.6%	Used cocaine in the past week (7-day prevalence)
0%	Used cocaine in the past month (30-day prevalence)
6.2%	Used cocaine in the past year (annual prevalence)
92.1%	Never used
93.8%	Didn't use cocaine this year

Figure 3

Amphetamines: How often is it used?	
0%	Use amphetamines daily
3.1%	Used amphetamines in the past week (7-day prevalence)
1.5%	Used amphetamines in the past month (30-day prevalence)
0%	Used amphetamines in the past year (annual prevalence)
95.3%	Never used
100%	Didn't use amphetamines this year

Figure 4

Sedatives: How often is it used?	
0%	Use sedatives daily
0%	Used sedatives in the past week (7-day prevalence)
1.5%	Used sedatives in the past month (30-day prevalence)
1.5%	Used sedatives in the past year (annual prevalence)
96.8%	Never used
98.5%	Didn't use sedatives this year

Figure 5

Hallucinogens: How often is it used?	
0%	Use hallucinogens daily
0%	Used hallucinogens in the past week (7-day prevalence)
1.5%	Used hallucinogens in the past month (30-day prevalence)
9.4%	Used hallucinogens in the past year (annual prevalence)
89.0%	Never used
90.6%	Didn't use hallucinogens this year

Figure 6

Opiates: How often is it used?	
0%	Use opiates daily
1.5%	Used opiates in the past week (7-day prevalence)
0%	Used opiates in the past month (30-day prevalence)
1.5%	Used opiates in the past year (annual prevalence)
96.9%	Never used
98.5%	Didn't use opiates this year

Figure 7

Inhalants: How often is it used?	
0%	Use inhalants daily
0%	Used inhalants in the past week (7-day prevalence)
0%	Used inhalants in the past month (30-day prevalence)
1.5%	Used inhalants in the past year (annual prevalence)
98.5%	Never used
98.5%	Didn't use inhalants this year

Figure 8

Steroids: How often is it used?	
0%	Use steroids daily
0%	Used steroids in the past week (7-day prevalence)
0%	Used steroids in the past month (30-day prevalence)
0%	Used steroids in the past year (annual prevalence)
100%	Never used
100%	Didn't use steroids this year

Figure 9

Other Illegal Drugs: How often are they used?	
0%	Use other illegal drugs daily
0%	Used other illegal drugs in the past week (7-day prevalence)
0%	Used other illegal drugs in the past month (30-day prevalence)
1.5%	Used other illegal drugs in the past year (annual prevalence)
98.5%	Never used
98.5%	Didn't use other illegal drugs this year

Figure 10

Percent of Students Reporting “Problematic Experiences”

The average number of drinks consumed per week by students at this institution is 1.43 drinks. The national average is 4.6 drinks (based on the national reference group of 61,057). The proportion of students who report having had problems as a result of drinking or drug use is another indicator of the level of substance abuse. The percentages of students who reported that within the past year they had various problematic experiences are displayed in Figures 11-13. The top group of items (Figure 11) represents public misconduct or behaviors that involve actual or potential harm to others. The second group (Figure 12) represents possibly serious personal problems. The last group (Figure 13) consists of less serious experiences, but they still indicate excessive use.

Public misconduct or behaviors that involved actual or potential harm to others		
NUHS	Ref. Group	Experience
4.7%	11.2%	Been in trouble w/ police, residence hall, college authorities
0%	5.3%	Damaged property, pulled fire alarms, etc.
8.0%	24.1%	Driven a car while under the influence
15.9%	29.9%	Got into an argument or fight

Figure 11

Possibly serious personal problems		
NUHS	Ref. Group	Experience
0%	1.2%	Tried to commit suicide
3.2%	4.0%	Seriously thought about suicide
1.6%	14.3%	Been hurt or injured
3.2%	8.5%	Been taken advantage sexually
0%	2.6%	Taken advantage of another sexually
4.8%	5.0%	Tried unsuccessfully to stop using
7.8%	9.8%	Thought I might have a drinking or other drug problem
11.3%	20.2%	Performed poorly on a test or important project

Figure 12

Less serious (& more common) experiences, but still indicates excessive use		
NUHS	Ref. Group	Experience
14.3%	34.0%	Done something I later regretted
14.1%	26.4%	Missed a class
15.6%	28.3%	Been criticized by someone I know
11.0%	32.3%	Had a memory loss or blacked out
25.4%	50.8%	Got nauseated or vomited
41.3%	59.6%	Had a hangover

Figure 13

Employees: Key AOD Survey Findings: (45% response rate)

Demographic Data

1. The gender you most closely identify with is:
 - Female: 61 %
 - Male: 37 %
 - Other: 0 %
 - Prefer not to answer: 2 %
2. The marital status you most closely identify with is:
 - Single: 18 %
 - Married/Partnered: 68 %
 - Divorced: 6 %
 - Widowed: 3 %
 - Prefer not to answer: 5 %
3. The racial ethnicity you most closely identify with is:
 - Amer. Indian/Alaska Native: 0 %
 - Asian: 2 %
 - Black or African American: 6 %
 - Hispanic of Any Race: 7 %
 - Native Hawaiian/Pacific Isl.: 1 %
 - White: 76 %
 - Prefer not to answer: 8 %
4. Your current employment status:
 - Faculty: 58 %
 - Staff: 42 %
5. Do you have any close family members, who has/had an alcohol/drug problem?
 - Yes: 30 %
 - No: 70 %

AOD (Alcohol and Other Drug) Policy Awareness

6. Does NUHS have a policy addressing alcohol or other drugs?
 - Yes: 69 %
 - No: 0 %
 - Unsure: 31 %
7. Have you ever seen/read any NUHS policy addressing alcohol or other drugs?
 - Yes: 53 %
 - No: 26 %
 - Unsure: 21 %
8. Do the NUHS policies on alcohol or other drugs pertain to faculty & staff?
 - Yes: 70 %
 - No: 0 %
 - Unsure: 30 %
9. Do you know where to find NUHS policies pertaining to alcohol or other drugs?
 - Yes: 63 %
 - No: 22 %
 - Unsure: 15 %

Awareness of AOD Prevention, Training and Support

10. Does NUHS have an alcohol or other drug prevention program for students?
 - Yes: 16 %
 - No: 5 %
 - Unsure: 79 %
11. Does NUHS have an alcohol or other drug prevention program for faculty & staff?
 - Yes: 14 %
 - No: 8 %
 - Unsure: 78 %

12. Do you believe NUHS is concerned about the prevention of alcohol and other drug abuse by its students, faculty & staff?
- | | |
|---------|------|
| Yes: | 73 % |
| No: | 6 % |
| Unsure: | 21 % |
13. Does NUHS provide information to students concerning the health risks associated with the use/abuse of alcohol or other drugs?
- | | |
|---------|------|
| Yes: | 33 % |
| No: | 1 % |
| Unsure: | 66 % |
14. Have you ever provided information concerning the use/abuse alcohol and other drugs to students, outside of course content?
- | | |
|------|------|
| Yes: | 18 % |
| No: | 82 % |
15. Does NUHS provide/offer training programs so that faculty & staff can identify students or colleagues who have problems with alcohol or other drugs?
- | | |
|---------|------|
| Yes: | 12 % |
| No: | 28 % |
| Unsure: | 60 % |
16. Do you know how to identify the signs of alcoholism and/or drug abuse?
- | | |
|------|------|
| Yes: | 75 % |
| No: | 25 % |
17. Do you feel that training regarding the identification of alcoholism and/or drug abuse among students would be helpful?
- | | |
|------|------|
| Yes: | 80 % |
| No: | 20 % |
18. If a student or a colleague needed help with alcohol or other drug problems, would you know how to refer them for such help?
- | | |
|---------|------|
| Yes: | 54 % |
| No: | 29 % |
| Unsure: | 17 % |

Awareness of Disciplinary Actions for AOD violations

19. Are appropriate disciplinary actions taken by NUHS when alcohol or drug policies have been violated by students?
- | | |
|---------|------|
| Yes: | 35 % |
| No: | 1 % |
| Unsure: | 64 % |
20. Are appropriate disciplinary actions taken by NUHS when alcohol or drug policies have been violated by faculty & staff?
- | | |
|---------|------|
| Yes: | 38 % |
| No: | 0 % |
| Unsure: | 62 % |

Employee Opinions of AOD Program Effectiveness (Prevalence, Prevention, Impact)

21. Do you think that alcohol or other drug use negatively affects the quality of student life at NUHS?
- | | |
|------|------|
| Yes: | 63 % |
| No: | 37 % |
22. Do you believe student academic performance is affected by alcohol or other drug use at NUHS?
- | | |
|------|------|
| Yes: | 60 % |
| No: | 40 % |
23. Are you personally aware of a student(s) whose academic performance has been affected by alcohol or other drug use at NUHS?
- | | |
|------|------|
| Yes: | 21 % |
| No: | 79 % |
24. Do you consider the current alcohol and other drug use of NUHS students and faculty & staff to be a problem?
- | | |
|------|------|
| Yes: | 12 % |
| No: | 88 % |

4. AOD Policy, Enforcement & Compliance Inventory

NUHS Drug and Alcohol Abuse Prevention Policy (DAAPP)

The *Higher Education Act of 1965* (as amended by the *Safe and Drug-Free Schools and Communities Act of 1994* and the *Drug-Free Workplace Act of 1988*) requires any institution of higher education, as a condition of receiving funds or any other form of financial assistance under any federal program, to certify that it has adopted and implemented a drug prevention program to prevent the unlawful possession, use, or distribution of illicit drugs and alcohol by students and employees. The Department of Education's regulations at **34 C.F.R. Part 86** requires that NUHS, as part of its drug & alcohol abuse prevention program for students and employees, annually distributes (in a manner consistent with federal guidelines) the following information:

1. **Standards of conduct** that clearly prohibit 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 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 available drug and alcohol counseling, treatment, rehabilitation, or re-entry programs; and
5. A clear statement of the **disciplinary sanctions that the University will impose** on students or employees who violate these standards of conduct.

The University will conduct a **biennial review** of its drug prevention program to determine its effectiveness, implement changes as needed, and ensure that the disciplinary sanctions are consistently enforced. The National University of Health Sciences fully supports the objectives of these laws and their related regulations. The University recognizes both alcohol and drug abuse as potential health, safety, and security problems. The University expects its students and employees to cooperate in maintaining a University environment free from the effects of alcohol and other drugs and to comply with this policy.

Standards of Conduct: Students and Employees (excerpted from DAAPP)

The National University of Health Sciences is an institution committed to promoting the physical, intellectual, social, ethical, and spiritual development of all its members. The abuse of alcohol and the illicit use of other drugs can seriously threaten the health and safety of students, employees, their families, fellow students, and the general public. In addition to promoting health, safety and a positive learning and working environment, the National University of Health Sciences is committed to reducing and preventing alcohol and other drug-related problems among all members of the campus community.

The unlawful possession, use, or distribution of alcohol or other drugs by anyone, either on our institution's property or as any part of University sponsored activities, is prohibited. Any person who is determined to violate this policy will be subject to intervention by The National University of Health Sciences. That intervention may include disciplinary action up to and including expulsion, or termination of employment and/or referral for prosecution, for violations of the standards of conduct.

As a condition of employment, an employee of The National University of Health Sciences must notify his/her supervisor if he or she has been convicted of an alcohol and/or other drug-related offense involving the workplace within five (5) days of the conviction. In the event that any such conviction involves an employee working on a federal contract or grant, the University is required to notify the granting or contracting Federal agency within ten (10) days of receiving notice of the conviction.

This policy and its requirements are consistent with The National University of Health Sciences' desire to promote campus community health and safety and are in accordance with the requirements of the *Drug-Free Workplace Act of 1988* and the *Safe and Drug-Free Schools and Communities Act of 1994*. The National University of Health Sciences will continue its efforts to maintain an environment free from the unlawful possession, use, and distribution of alcohol and other drugs by adhering to this policy and by providing ongoing health promotion, risk reduction, intervention, and referral services for treatment and aftercare programs. A copy of this policy shall be distributed annually to all students and employees of the National University of Health Sciences.

Alcohol and Other Drugs Prohibited at NUHS

Any behavior that may have been influenced by a student or employee mental state (regardless of the ultimate evaluation) or use of drugs or alcoholic beverages will not, in any way, limit their personal responsibility for the consequences of their actions.

The *NUHS Code of Student Conduct*, *NUHS Employee Handbook 2022*, and the *NUHS Faculty Handbook – FY 2021-22* specifically prohibit numerous forms of misconduct (including AOD offenses) that may result in an official notice of an alleged violation followed by an impartial hearing. What follows are three forms of prohibited conduct that are addressed in the ***NUHS Drug and Alcohol Abuse Prevention Policy***, that deal with alcohol, controlled substances, & weapon violations.

Alcohol Violations

Violations associated with alcohol use include, but are not limited to:

- The unlawful possession, use or distribution of alcohol or other drugs by anyone, either on our institution's property or as any part of University sponsored activities, is prohibited. Any person who is determined to violate this policy will be subject to intervention by The National University of Health Sciences. That intervention may include disciplinary action up to and including expulsion, or termination of employment and/or referral for prosecution, for violations of the standards of conduct.
- Illinois and Florida law prohibits the consumption and possession of alcohol by persons under the age of 21 and the supplying of alcohol to any person under the age of 21. Additionally, Illinois law prohibits the sale of alcoholic beverages except by those licensed to sell such beverages. Laws in Illinois and Florida together with City ordinances in both states also prohibit public intoxication, the operation of a vehicle or bicycle under the influence of alcohol or other intoxicants, and the consumption of alcohol in a public place. Violation of these laws or other laws relating to drugs and alcohol may result in probation, fines, imprisonment and a permanent criminal record. Violation of drug laws may also result in civil seizure and forfeiture of property used in connection with the offense. A conviction may also result in University disciplinary action.

Controlled Substance Violations

Federal law penalizes the manufacture, distribution, possession with intent to manufacture or distribute and simple possession of drugs ("controlled substances"). Federal penalties and sanctions for the simple possession of a controlled substance are quite severe (Refer to the full text of the ***NUHS Drug and Alcohol Abuse Prevention Policy***). The law sets forth sentences and fines that include the following:

- First conviction: up to one-year imprisonment, a fine of at least \$1,000 or both. After one prior drug conviction: at least 15 days in prison, not to exceed two years, and a fine of at least \$2,500. After two or more prior drug convictions: at least 90 days in prison, not to exceed three years, and a fine of at least \$5,000. A special, harsher sentencing provision applies for possession of flunitrazepam (Rohypnol). (21 U.S.C. §844(a))
- Forfeiture of personal and real property used to possess or to facilitate possession of a controlled substance if that offense is punishable by more than one-year imprisonment, as well as forfeiture of vehicles, boats, aircraft, or any other conveyance used to transport or conceal a controlled substance. (21 U.S.C. §§853(a) & 881(a))
- Denial of federal benefits, such as student loans, grants, contracts, and professional and commercial licenses, up to five years for the first offense, up to 10 years for the second offense, and permanently upon the third offense. (21 U.S.C. §862)
- Ineligibility to receive or purchase a firearm. (18 U.S.C. §922(g))

Moreover, revocation of certain federal licenses and benefits (e.g., pilot licenses, public housing tenancy) are vested within the authorities of individual federal agencies. These penalties may be doubled, however, when a person at least 18 years old: (1) distributes a controlled substance to a person under twenty-one years of age (a term of imprisonment for this offense shall not be less than one year), and/or (2) distributes, possesses with intent to distribute, or manufactures a controlled substance **in or on, or within one thousand feet of, the real property comprising a public or private elementary or secondary school, or a public or private college.** (21 U.S.C. §§859 & 860)

ILLINOIS CONTROLLED SUBSTANCES SANCTIONS

Illinois statutes cover a wide range of drug offenses other than cannabis: *720 ILCS 570/401*, et seq. (other controlled substances). Sentences and fines for simple possession of various controlled substances are outlined in **Table B of the NUHS Drug and Alcohol Abuse Prevention Policy**.

FLORIDA CONTROLLED SUBSTANCES SANCTIONS

The 1990 session of the Florida Legislature led to stronger measures against those who traffic in illegal drugs, especially crack and cocaine, which are considered extremely dangerous. **Florida law now calls for life imprisonment, without possibility of parole, for the trafficking of 150 kilograms or more of cocaine.** If violence surrounds the incidents, the act could be **punishable by death**. Harsher penalties were also written into law for the sale of lesser amounts of cocaine and other lethal drugs. The Legislature also made it illegal to traffic in controlled substances within 200 feet of a public housing facility, a public or private college or university, or a public park. It has also been unlawful to do so near an elementary or secondary school.

Under Florida law and Pinellas County city ordinances, it is unlawful for any person to sell, purchase, manufacture, deliver or possess a controlled substance. A person who violates this provision is guilty of a felony of the first, second, or third degree, which is partially determined by the type of drug and the quantity involved. Violators may be subject to the stiffest penalties available. The maximum penalty for trafficking specified amounts of cocaine or any mixture containing cocaine including, but not limited to crack, under Florida law is a first-degree felony **punishable by death**.

Based on the quantity involved, penalties for trafficking in illegal drugs including, but not limited to, the narcotics morphine, opium, and heroin, range from mandatory minimum imprisonment of three years and a \$50,000 fine to 25 years and a \$500,000 fine. Based on the quantity involved, other penalties for trafficking in illegal drugs including, but not limited to, marijuana, inhalants, depressants and other stimulants, range from five years imprisonment and a \$5,000 fine to 30 years imprisonment and a \$15,000 fine. Further, it is unlawful for any person to use, or to possess with intent to use, to deliver, possess with the intent to deliver, or to manufacture with intent to deliver drug paraphernalia. It is unlawful for any person to sell, purchase, manufacture, or deliver, or to possess with the intent to sell, purchase, manufacture, or deliver, a controlled substance **in, on, or within 200 feet of the real property comprising a public or private college, university, or other postsecondary educational institution.**

For further information, consult Florida Statutes, Chapter 893. Local city and Pinellas County ordinances are not cited in this policy, as they do not increase or strengthen the sanctions mandated by Florida law.

Weapons, Explosives & Hazardous Material Restrictions

All NUHS students, employees (faculty and staff), vendors conducting business with the University and visitors, unless authorized by law or a specific exception (noted below), are prohibited:

- From possessing, storing, carrying, or unlawfully using any weapon or firearm on restricted University property (including on-campus University housing) or in any vehicle owned, leased or controlled by the University, even if that person has a valid federal or state license to possess or carry a firearm.
- From displaying, brandishing, discharging or otherwise using any and all weapons or firearms, including concealed weapons or firearms on restricted University property.
- All weapons, including but not limited to a concealed firearm/handgun are prohibited on any restricted University property unless all provisions of a firearms exception (***noted below under: Exceptions***) are met, or waived (e.g. an on duty security official or law enforcement officer).

Prohibited weapons, explosives or hazardous material include but are not limited to:

- Firearm, Handgun, Firearm ammunition, BB gun, pellet gun, paintball gun, tear gas gun, stun, taser, or other dangerous or deadly device of similar type; (***In Florida, a registered student who is licensed to carry a concealed weapon may carry a stun gun or nonlethal electric weapon or device designed solely for defensive purposes if the weapon does not fire a dart or projectile***);
- Knife with a blade of at least 3 inches in length (except an ordinary eating utensil), dagger, dirk, switchblade knife, stiletto, ax, hatchet, or other deadly or dangerous weapon or instrument of similar type;
- Bludgeon, blackjack, slingshot, sandbag, sand club, metal knuckles, billy-club, throwing star, nunchaku, or other dangerous or deadly weapon of similar type;
- Bomb, bombshell, grenade, firework, bottle, or other container containing an explosive, toxic, or noxious substance, unless under academic/classroom supervision, (other than an object containing a nonlethal noxious liquid, gas, or substance designed solely for personal defense possessed by a person 18 years of age or older);
- Souvenir weapon or other weapon that has been rendered permanently inoperative.

EXCEPTIONS

Carrying or use of a firearm will be permitted in the following circumstances:

1. The firearm is carried by an on duty law enforcement officer required to carry a weapon or firearm as a condition of his or her employment; the firearm is carried by an enforcement officer from an external agency conducting official business on University property; or
2. A concealed firearm may be stored within a personally owned vehicle on University property only if all of the following conditions are met:
 - **In Illinois:** the individual must have a valid concealed-carry license,
 - **In Florida:** the individual may do so *without a license*; and
 - The firearm and its ammunition must be concealed in a locked case within a locked vehicle ("case" includes a glove compartment or console that completely encloses the firearm or ammunition, the trunk of the vehicle, or a firearm carrying box, shipping box, or other container) OR within a locked container out of plain view within a locked vehicle; and
 - If the person removes the concealed firearm from the vehicle, it must first be unloaded inside the vehicle, and it may only be removed for the limited purpose of storing or retrieving it from the trunk of the vehicle.
3. **Florida site only:** a firearm in the possession of a student or instructor while actively involved as a student or instructor at the Allstate Campus or persons actively utilizing the Allstate Campus' indoor firing range, but only while actively involved in these two activities or directly and immediately going to or coming from those activities. All such firearms (except those in the possession of a law enforcement officer) must be completely unloaded, with any magazine removed, until the student or instructor arrives at the Allstate Campus, and before leaving the Allstate Campus to go to a parked automobile or to leave campus.

5. AOD Program Intervention Strategies: Individual & Environmental

Use of National Institute on Alcohol Abuse & Alcoholism (NIAAA) Strategies

In the past several decades, significant progress has been made in clarifying what does and doesn't work to prevent alcohol-related problems among college students. Hundreds of studies have been published in peer-reviewed journals, according to NIAAA, more than half have shown some degree of effectiveness, about a third have mixed results or have too little evidence to warrant an effectiveness rating, and a few have been shown to be ineffective.

Two Strategies Utilized at NUHS: Individual and Environmental

Individual-level strategies generally aim to assist students identified as problem, at-risk, or alcohol-dependent drinkers. It is important to engage these students as early as possible. Environmental strategies seek to affect the behavior of the overall student population by addressing the factors that accommodate or promote underage and high-risk drinking.

Individual-level strategies are designed to change students' knowledge, attitudes, and behaviors related to alcohol so that students drink less, take fewer risks, and experience fewer harmful consequences. Expected outcomes, in general, are that a strategy may decrease an individual's alcohol use (e.g., frequency, quantity, or blood alcohol concentration) and/or alcohol-related risk-taking behaviors, thereby reducing harmful consequences.

Environmental-level strategies are designed to change the campus and community environments in which student drinking occurs. Often, a major goal is to reduce the availability of alcohol, because research shows that reducing alcohol availability cuts consumption and harmful consequences on campuses as well as in the general population.

Figure 14 – NUHS AOD Intervention Strategies

Strategy	Description
Information/Knowledge/Education	Provide students with alcohol-related education (e.g., how alcohol is processed by the body, potential consequences of alcohol misuse), without any alcohol-specific skills training.
Self-help, Recovery-based groups	These programs combine training in skills aimed at reducing alcohol use (e.g., drink refusal and abstinence of alcohol) w/ training in general life skills.
Advocate alcohol-free programming	Campus hosts alcohol-free events to provide students with social alternatives to parties and bars where alcohol is being served.
Prohibit alcohol use/sales at campus sporting events	Campus limits the sale and consumption of alcohol at sporting events.
Prohibit alcohol use/service at campus social events	Campus limits the sale and consumption of alcoholic beverages at social events held on campus property.
Enforce age-21 drinking age	Under this strategy, campuses and local and state government support and implement strong enforcement of the existing age-21 minimum legal drinking age. (Compliance checks are an approach regulated at the local or state level whereby undercover youth, supervised by law enforcement or licensing authorities, attempt to purchase alcohol. When a violation occurs, a penalty is applied to the server and/or the license holder, depending on local or state law.)

Figure 14 (Continued) – NUHS AOD Intervention Strategies

Strategy	Description
Restrict alcohol sponsorship and advertising	A campus or local or state government establishes policies that restrict or prohibit alcohol sponsorship and/or advertising of alcoholic beverages, particularly where such sponsorship or advertising exposes young people to alcohol messages, such as on college campuses, at rock concerts, or at athletic events.
Prohibit beer kegs	A ban on beer kegs is an approach taken by a campus or local government in an effort to decrease the amount of alcohol at parties. Bans may apply to specific settings such as athletic events or parties.
Restrict happy hours/price promotions	Under this strategy, a campus or local government prohibits or restricts drink specials, such as the sale of two alcoholic beverages for the price of one – encouraging patrons to drink more than usual.
Retain or enact restrictions on hours of alcohol sales	Under this strategy, campuses or local & state governments retain or enact policies limiting the hours during which alcohol may be sold legally.
Establish minimum age requirements to serve/sell alcohol	Under this strategy, campuses or local & state governments establish requirements specifying how old someone must be to serve or sell alcohol. Requirements may differ by type of alcohol establishment (e.g., off- vs. on premise establishments and type of alcohol—beer, wine, or spirits) and may include exceptions under certain circumstances.

6. AOD Intervention Program: Assistance and Support Resources

Counseling, Treatment and Referral

Students and employees who believe they may have an alcohol or drug problem are strongly encouraged to seek assistance through resources available at the University. Employees may contact the Director of Human Resources. The Director will connect employees with a local agency experienced at helping individuals on an outpatient basis.

Students are instructed to seek help through the Office of Student Services. Such contacts will be kept confidential, except as required by law or by concern for the immediate health, safety, or security of the individual or others.

Referrals by the Director of Human Resources (employees) or Student Services personnel (students) can be made to publicly funded mental health professionals (e.g., psychologists, social workers, psychiatrists) who are available to discuss an employee or student's concerns regarding drug or alcohol use in their life or in the life of someone close to them. Seeking professional assessment can frequently bring new perspective.

Individuals requiring inpatient detoxification and/or rehabilitative services can be referred to institutions and hospitals in the local community that specialize in these types of services. The costs of such treatment and referrals may be covered in whole or in part by the individual's health insurance.

The University has the right to take any necessary action to protect the health, safety, and security of the affected individual and other members of the University community, including deciding whether, when, and under what conditions a student may be reinstated, or any employee may be returned to employment after an instance of alcohol abuse or improper drug use.

Students with questions about University alcohol and other drug policy, or any other University policy or rule, should contact the Dean of Students (630-889-6546).

Employees should contact the Director of Human Resources (630-889-6878).

Alcohol and Substance Abuse Recovery Support Groups

Please refer to the **NUHS Drug & Alcohol Abuse Prevention Policy** for links to a variety of self-help support groups for individuals seeking to recover from alcoholism and drug addiction. These groups are not formally affiliated with nor specifically endorsed by NUHS. Each, however, has been shown to be helpful for people seeking recovery help and support.

Additional Resources, Facilities and Referral Organizations

DuPage P.A.D.S. (Public Action to Deliver Shelter) 705 W. Liberty Drive, Wheaton, IL 60187
(630) 682-3846 (Offices) Client Service Center
703 W. Liberty Drive, Wheaton, IL 60187 (630) 682-8567 - 1-877-682-8567
www.dupagepads.org

Serenity House Counseling Services, Inc.
891 S. Rohling Road Addison, IL 60101 (630) 620-6616 www.serenityhouse.com

Florida Site – Alcohol & Substance Abuse Operation PAR
6655 – 66th St. N., Pinellas Park, FL 33781 727-545-7564
www.operationpar.com

Northside Hospital Company Care
6000 – 49th St., N., St. Petersburg, FL 33709 727-521-4411
www.NorthsideHospital.com

7. AOD Recent Reporting Trends – NUHS Sites

There were **no** alcohol or other drug related incidents or fatalities that occurred on either of the NUHS educational sites (as defined by the *Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act*, also known as the “Clery Act”) during the last 3-year reporting period from 2018 to 2020 or that was reported to any campus official at the Illinois or the Florida site over the same 3-year reporting period.

The two tables (below) document the liquor law or drug violations in Illinois (Figure 15) and Florida (Figure 16) collected and reported as part of the annual campus crime statistics, to the Department of Education under the “Clery Act” in October of 2021. In 2018 there were six (6) reported arrests by local police occurring near NUHS on “Clery” property in Illinois; 6 drug violations; and 11 liquor law & 4 drug violations in 2019. In 2020, there were 4 liquor law & 3 drug violations on non-campus public property. **None** of the arrests involved NUHS students or employees.

Illinois Site – Main Campus	2018	2019	2020
Liquor Law: Referral/Arrest	0/0	0/11 ^{#4}	0/4 ^{#4}
Drug Violations: Referral/Arrest	0/6 ^{#4}	0/4 ^{#4}	0/3 ^{#4}
Weapons Possessions: Referral/Arrest	0/0	0/0	0/0
Totals	0/6 ^{#4}	0/15 ^{#4}	0/7 ^{#4}

Figure 15

#1 On-campus, #2 On-campus housing, #3 Non-campus property, #4 Public property

2018 – 6 arrests on public property by local police, 1 on-campus arrest by local P.D. for battery – Clery counted as Aggravated Assault because attacker inflicted bodily harm w/ fists on face & ribs while pulling victim’s hair. Severe injuries prevented by restraining attacker.

2019 – 15 arrests on public property by local police.

2020 – 1 incident of Dating Violence in on-campus housing reported to Security & Police. 7 arrests on public property by local police.

Florida Site – Health Education Center	2018	2019	2020
Liquor Law: Referral/Arrest	0/0	0/0	0/0
Drug Violations: Referral/Arrest	0/0	0/0	0/0
Weapons Possessions: Referral/Arrest	0/0	0/0	0/0
Totals	0	0	0

Figure 16

8. AOD Nationwide Trends: US Colleges & Universities

The key findings, comparative analysis of the lifetime, annual, and 30-day prevalence of substance use, together with the “problematic experiences” that reportedly result because of drinking or drug use within the National University of Health Sciences (Illinois and Florida sites) is **substantially** lower than most reliable and noteworthy national studies on the use of drugs and consumption of alcohol on college campuses across the U.S.

The U.S. Surgeon General and the U.S. Department of Health and Human Services (USDHHS) have identified binge drinking among college students as a major public health problem. In fact, the Federal government has singled out binge drinking among college students for a specific, targeted reduction. ***Binge drinking as a serious, widespread national public health problem, however, has not gained traction within the NUHS community.***

The consequences of excessive and underage drinking affect virtually all college campuses, college communities, and college students, whether they choose to drink or not. National statistics compiled since 2006 reveal the disturbing consequences of the trend.

- **Deaths:** 1,400 college students between the ages of 18 and 24 die each year from alcohol-related unintentional injuries, including motor vehicle crashes (Hingson et al., 2002).
- **Injuries:** 500,000 students between the ages of 18 and 24 are unintentionally injured under the influence of alcohol (Hingson et al., 2002).
- **Assaults:** More than 600,000 students between the ages of 18 and 24 are assaulted by another student who has been drinking (Hingson et al., 2002).
- **Sexual Abuse:** More than 70,000 students between the ages of 18 and 24 are victims of alcohol-related sexual assault or date rape (Hingson et al., 2002).
- **Unsafe Sex:** 400,000 students between the ages of 18 and 24 had unprotected sex and more than 100,000 students between the ages of 18 and 24 report having been too intoxicated to know if they consented to having sex (Hingson et al., 2002).
- **Academic Problems:** About 25 percent of college students report academic consequences of their drinking including missing class, falling behind, doing poorly on exams or papers, and receiving lower grades overall (Engs et al., 1996; Presley et al., 1996a, 1996b; Wechsler et al., 2002).
- **Health Problems/Suicide Attempts:** More than 150,000 students develop an alcohol-related health problem (Hingson et al., 2002) and between 1.2 and 1.5 percent of students indicate that they tried to commit suicide within the past year due to drinking or drug use (Presley et al., 1998).
- **Drunk Driving:** 2.1 million students between the ages of 18 and 24 drove under the influence of alcohol last year (Hingson et al., 2002).
- **Vandalism:** About 11 percent of college student drinkers report that they have damaged property while under the influence of alcohol (Wechsler et al., 2002).
- **Property Damage:** More than 25 percent of administrators from schools with relatively low drinking levels and over 50 percent from schools with high drinking levels say their campuses have a “moderate” or “major” problem with alcohol-related property damage (Wechsler et al., 1995).

Based upon the NIH – National Institute on Alcohol Abuse and Alcoholism (NIAAA) Task Force publication (2002) on ***“Changing the Culture of Drinking at U.S. Colleges,”*** the most significant factors affecting student drinking and drug use over the last two decades are:

- **Living Arrangements** – Students who live independently off-site (e.g., in apartments) drink less, while commuting students who live with their families drink the least (O’Hare, 1990; Presley et al., 1996a, 1996b). Drinking rates are highest in fraternities and sororities followed by on-campus housing (e.g., dormitories, residence halls) (Presley et al., 1996a, 1996b; Wechsler et al., 1998, 2000b).
- **College Characteristics** – A number of environmental influences working in concert with other factors may affect students’ alcohol consumption (Presley et al., 2002). Colleges and universities where excessive alcohol use is more likely to occur include schools where Greek systems dominate (i.e., fraternities, sororities), schools where athletic teams are prominent, and schools located in the Northeast (Presley et al., 1996a, 1996b; Wechsler et al., 1996, 1997, 1998, 2000b;

Werner and Greene, 1992).

- **First-Year Students** – First-year students who live on campus may be at particular risk for alcohol misuse. The transition to college is often so difficult to negotiate that about one-third of first-year students fail to enroll for their second year (Upcraft, 2000).
- **Other Factors Affecting Drinking** – Numerous other factors affect drinking behavior among college students. These include biological and genetic predisposition to use, belief system and personality, and expectations about the effects of alcohol (Sher et al., 1999; Zucker et al., 1995). In addition to individual student characteristics, the size of a student body, geographical location, and importance of athletics on campus are also associated with consumption patterns as are external environmental variables including the pricing and availability of alcohol in the area surrounding a campus (Chaloupka and Wechsler, 1996; Chaloupka et al., 1998; Leichter et al., 1998; Nelson and Wechsler, 2001; Presley et al., 1996a, 1996b; Wechsler et al., 1994, 1997, 1998, 2000a, 2000b).

9. Assessing AOD Program Effectiveness & Enforcement Consistency

NUHS Students: Graduate Level, Future Healthcare Providers = Low AOD Rates

The national statistics related to alcohol and other drug use at colleges and universities across the US reflect a daunting pattern of problematic campus issues (e.g., deaths, injuries, assaults, sexual abuse, academic problems, vandalism, etc.) that have been closely linked for several decades with the accessibility, excessive use and abuse of alcohol and other drugs.

There are several key factors (interrelated with undergraduate education) that foster an at-risk ethos for students transitioning from high school and home to the undergraduate culture within US colleges and universities. These factors have been identified, analyzed, and described for years by the National Institute on Alcohol Abuse and Alcoholism (NIAAA) Task Force in the publication entitled “**Changing the Culture of Drinking at U.S. Colleges.**” The most problematic of these factors affecting future drug and alcohol use in college by students are:

- Overall, alcohol and other drug (AOD) abuse rates are highest in fraternities and sororities followed by on-campus resident housing.
- Students who live independently off-campus (e.g., in apartments) use/abuse AOD less, while commuting students who live with their families use/abuse AOD the least.
- AOD abuse is more likely to occur at schools located in the Northeast US, and where Greek systems have a large presence (multiple fraternities & sororities), also where school-sponsored intercollegiate athletic team activities are a prominent aspect of collegiate life.
- First-year students who live on campus are especially at-risk to misuse or abuse drugs and/or alcohol. The transition to undergraduate study in the US is often so difficult to negotiate for 18- to 21-year-old students that about one-third of all first-year students in the US fail to enroll for their second year.

Comparing the NIAAA factors (above) that affect drinking behavior and drug use against current NUHS student body demographic data (below), it is obvious that there are distinct differences in susceptibility to key problematic factors (e.g., age, education, living arrangements, declared degree major or career, etc.) cited by national AOD surveys of undergraduate enrollees and the older, graduate-level matriculants to the National University of Health Sciences.

- The average age of a student enrolled at NUHS is 29.83 years.
- 60% are women, 40% are men.
- NUHS has only one fraternity and one sorority.
- NUHS does not have any intercollegiate athletic teams.
- 94% are enrolled in graduate or professional doctoral degree programs.
- 6% are enrolled in a prerequisite degree completion program.
- 91.7% carry a “full time” post-baccalaureate/graduate level course-load.
- 28.6% live in on-campus residential housing.
- 71.4% live in off-campus apartments, etc., and commute to campus.

At NUHS, a baccalaureate degree and a minimum GPA of 3.00 is required to be eligible for admission into one of the graduate or professional doctoral degree programs. Applicants lacking the necessary science prerequisites, may complete that coursework in National University's Prerequisite Program. Owing to the nature and academic rigor of pursuing a graduate-level healthcare degree, the at-risk factors that commonly threaten the health and academic success of undergraduate students at colleges and universities across the U.S. are usually avoided by experienced students who undertake careers requiring graduate or professional degrees.

In the decade following the 2012 Office of the Inspector General (OIG) report to the Office of Federal Student Aid (FSA) ordering closer documentation that institutions of higher education have complied with the Part 86 requirements, the assessment of AOD program effectiveness to prevent drug and alcohol abuse and to ensure disciplinary sanctions are consistently enforced has consistently demonstrated that when students at NUHS are compared to the undergraduate students usually targeted for study by nationwide surveys, the NUHS AOD abuse rates are **significantly lower** than the national abuse rates reported in the US. The older, career-driven, graduate-level individuals enrolled at NUHS are highly focused on completing advanced healthcare degrees as quickly as possible to minimize the overall amount of student loan indebtedness. A typical NUHS student undertakes uncommonly high credit-hour loads (averaging 24 to 27 science-based courses per term over five academic years) that leave minimal discretionary leisure time to indulge in the wide-ranging interests and extensive extra-curricular activities that may have occupied large segments of time in their undergraduate days.

In summary, NUHS students (compared to nationwide surveys of college and university students) consistently report **substantially lower** percentages of lifetime, annual, & 30-day prevalence of AOD use and various problematic experiences related to excess use. The consistently low prevalence and incidence rates reported by NUHS in previous Biennial Review reports (2016, 2018 and 2020) is due, in part, to the strength of the NUHS AOD program - its policies, interventions, support resources – but also because excessive alcohol intake and/or routine use of other drugs is an issue that the majority of NUHS students may have explored at an earlier period in their lives, but is currently relegated to an infrequent, minor activity or a negligible event while they are enrolled within the challenging coursework at NUHS.

Overall Program Effectiveness: Faculty and Staff Survey (45.5% response rate)

Regarding AOD policy awareness among the faculty and staff, 70% know the university has a **Drug and Alcohol Abuse Prevention Policy (DAAPP)** that applies to all students, faculty and staff members, and that 53% report having seen and read the policy. Consequently, 73% believe the university is concerned about preventing AOD abuse by students, faculty, and staff members.

Despite NUHS's widespread distribution and use of AOD information & prevention strategies (e.g., online training about health risks, ability to identify/refer or help people with AOD abuse issues, and easy access to incident-targeted assistance including a broad array of resources) NUHS faculty and staff report (66%) being unsure if the university provides information & training to help identify students or employees who need or who want AOD help. However, 82% report personally providing AOD help to a student or fellow employee. Also, 75% report knowing how to identify signs of AOD abuse but only 54% know how to refer someone for help.

NUHS AOD policies emphasize a *"wellness and rehabilitation"* therapeutic paradigm to address the addictive behavior that gives rise to AOD excess use and abuse. This approach is consistent with the science-based, patient-centered institutional profile that complements the university's longstanding mission to deliver competent and compassionate healthcare to the public. The pathology of AOD abuse is initially confronted therapeutically at NUHS – but not to the exclusion of the punitive restraints that federal, state or civil law may stipulate.

As members of the NUHS learning community, NUHS faculty & staff are trained and administratively appointed to actively participate, on a rotating basis, on a formal disciplinary hearing committee that may be assigned to adjudicate an AOD violation. Serving on disciplinary committee hearings to make sanctioning decisions is not a rare event but it is also not a frequent occasion. Consequently, only 36% of faculty and staff think disciplinary actions for AOD violations have been appropriate, and nearly two-thirds (64%) are unsure if the disciplinary sanction(s) have been appropriate.

A final issue involving public disclosure of disciplinary sanctions is that it is usually not advisable because it tends to undermine the corrective/rehabilitative spirit of sanctioning AOD violations by substituting punitive measures that employ public shaming tactics that do little to promote personal growth, healing,

and rehabilitation.

The reported response rate of 36% appropriate sanctions v. 64% unsure if sanctions are appropriate is not an issue considered to be out of line within a relatively small community with very low AOD violation rates.

10. Objectives for the Next Biennial Review in 2024

NUHS plans to continue the use of the Illinois Higher Education Center (IHEC) CORE Alcohol and Drug Surveys for students, and faculty/staff members to monitor the effectiveness of it's alcohol and other drug prevention efforts.

The University will also ensure that each student, faculty and staff member annually receives a copy of the updated ***NUHS Drug and Alcohol Abuse Prevention Policy***, that describe the standards of conduct, legal sanctions, health risks, counseling & rehabilitation, and disciplinary sanctions that apply to alcohol and other drugs.

NUHS will also continue to track the disciplinary sanctions (if any arise) that may be issued for violations of the *Drug and Alcohol Abuse Prevention Policy, Code of Student Conduct, Employee or Faculty Handbook* to ensure that sanctions are consistently enforced.

11. Appendices

Appendix A: [NUHS Drug and Alcohol Abuse Prevention Policy](#)

Appendix B: [NUHS Code of Student Conduct \(2021-23\)](#)

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Helpful Internet Links (links checked Sept. 2022)

Alcohol:

Alcohol Education Project of Hobart & William Smith Colleges <http://alcohol.hws.edu/>

Alcohol Help: <https://www.alcoholhelp.com/Alcohol/Overview-Alcoholism/>

Alcohol Policy Information System <http://www.alcoholpolicy.niaaa.nih.gov/>

Alcohol Rehab Guide <https://www.alcoholrehabguide.org/>

Alcohol Rehab Help: <https://alcoholrehabhelp.org/blog/types-of-alcohol/>

CDC Vital Signs Publication on Binge Drinking www.cdc.gov/vitalsigns/BingeDrinking

Center of Alcohol Studies <http://alcoholstudies.rutgers.edu/>

College Drinking: Changing the Culture <http://www.collegedrinkingprevention.gov/>

National Center on Addiction and Substance Abuse (CASA) <https://drugfree.org/about-us/>

National Clearinghouse for Alcohol and Drug Information (NCADI) <http://www.samhsa.gov/>

National Institute on Alcohol Abuse and Alcoholism (NIAAA) <http://www.niaaa.nih.gov/>

Substance Abuse and Mental Health Services Administration (SAMHSA) <http://www.samhsa.gov/>

TIPS (Training for Intervention Procedures) Program <http://www.gettips.com/>

U. S. Department of Justice, Drug Enforcement Administration (DEA) <https://www.dea.gov/>

United Nations Office for Drug Control and Crime Prevention <http://www.unodc.org/>

Other Drug Links:

Taking Action to Prevent and Address Prescription Drug Abuse: A Resource Kit for College Campuses
http://www.talkaboutrx.org/college_resource_kit.jsp

More Resources

Above the Influence

<https://abovetheinfluence.com/>

Dealing with Peer Pressure:

<https://www.bluecrestrc.com/dealing-with-peer-pressure/>

DrugFree.org

<https://drugfree.org/learn/drug-and-alcohol-news/>

NIAAA Program College Drinking - Changing the Culture

<https://www.collegedrinkingprevention.gov/>