



CIAM Biennial Review Report

Drug and Alcohol Abuse Prevention Program (DAAPP)

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

Biennial Review: Academic Years 2022-2023 & 2023-2024

Date of review: December 5, 2024

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Introduction

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 (IHE) such as CIAM to certify it has implemented programs to prevent the abuse of alcohol and use or distribution of illicit drugs both by CIAM students and employees on its premises and as a part of any of its activities. At a minimum, each institution of higher education must annually distribute the following in writing to all students and employees:

- Standards of conduct that clearly prohibit the unlawful possession, use or distribution of illicit drugs and alcohol by students and employees.
- A description of the legal sanctions under local, state, or federal law for the unlawful possession or distribution of illicit drugs and alcohol.
- A description of any drug or alcohol counseling, treatment, or rehabilitation or re-entry programs that are available to employees or students; and
- A clear statement that the institution will impose sanctions on students and employees 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.

To that end the University has developed a Drug and Alcohol Abuse Prevention Program (DAAPP). Our program is designed to prevent the abuse of alcohol and use or distribution of illicit drugs both by CIAM students and employees both on its premises and as a part of any of its activities.

Purpose

The purpose of the Biennial Review is to evaluate CIAM's Drug and Alcohol Abuse Prevention Program (DAAPP) to do the following:

1. Determine the program's effectiveness and implement changes to the program if changes are needed
2. Determine the number of drug and alcohol-related violations and fatalities that
 - a. occur on the institution's campus or as part of any of the institution's activities
 - b. are reported to campus officials.
3. Determine the number and type of sanctions that are imposed by the institution because of drug and alcohol-related violations and fatalities on the institution's campus or as a part of any of the institution activities
4. Ensure that the sanctions are consistently enforced.

CIAM acknowledges its legal obligation to conduct a biennial review for compliance with the Drug-Free Schools and Communities Act and authorized an administrative review to be conducted to determine if the university fulfills the requirements of the Federal regulations.

In support of the DFSCA, CIAM University conducts a biennial review of its Drug and Alcohol Abuse Prevention Program (DAAPP). The intention of the document is to meet the legal requirements of conducting a biennial review and summarize the programs and activities related to alcohol and drug prevention on CIAM's campus during the review periods.

Responsible Personnel and Departments

At CIAM, the Emergency Response Management Team Committee coordinates the Biennial Program Review process on behalf of the University every two even numbered years. The Committee is comprised of department heads representing all areas of the institution that are concerned with the health and safety of the community.

Emergency Response Management Team Committee

Chair:

Kien Tiet, Vice President of Operations and General Counsel

Members:

Geofrey Mills, President

Claudia Sarabia, Director of People Culture and Performance

Katie Lee, Director of Student Success/PDSO

Jack Paduntin, Provost and Vice President of Academics Affairs

Biennial Review Process

The committee is chaired by the Vice President of Operations and General Counsel, or their designee. The ERMT Chair, or designee, is the author of the Biennial Review.

The biennial reviews are kept in the office of Human Resources. Any requests for copies of the current or previous biennial reviews can be made to this office. The University maintains recordkeeping requirements that include keeping a copy of the biennial review and other compliance documents for three years after the fiscal year in which the record was created pursuant to 34 C.F.R. § 86.103.

This biennial review covers academic years 2022-2023 and 2023-2024. The Committee was convened in December 5th, 2024. Data for the biennial review was collected by the Committee chair, with the assistance of Committee members, and reviewed by the entire Committee. Data for this report on student conduct policy and employee handbook violations and sanctions were supplied by the following campus departments:

- Student Services
- Human Resources

Documentation and Distribution of Biennial Review

Annual Notification

Notification distributed annually to employees and students with the Annual Safety Report (ASR) by the departments of Human Resources and Student Success respectively. The complete document may be viewed on the Campus Safety webpage. New students receive a copy during New Student Orientation and enrollment, and employees receive a copy during New hire Orientation and onboarding.

Electronic Access:

The Annual Safety Report is available on the University's Campus Safety website for the respective groups to access as appropriate:

<https://ciam.edu/campus-safety/>

Physical Copies:

Hard Copies of the policy and Biennial Review are available at the following offices:

- Office of Student Success
- Office of Human Resources

Other Policies and Materials Reviewed

Policies which are applicable to this report that were reviewed in preparation for and as part of the biennial review:

- Annual Safety and Security Report
- Campus Safety Incident Reports and Crime logs
- Employee Handbook
- Faculty Handbook
- Course Catalog – specifically Student Conduct Policy
- Title IX Policy
- Drug & Alcohol Policy For a Drug-Free Campus

The administration of employee policies is overseen by Human Resources Office. The administration of the Student Conduct Policy is overseen by the Student Success Office.

CIAM has adopted and implemented programs to prevent the abuse of alcohol and use or distribution of illicit drugs by CIAM students and employees both on its premises and as part of any of its activities, as demonstrated through this biennial review. Additionally, CIAM has a written policy on alcohol and other drugs and has developed a method for distributing this policy to every student and employee. The written materials distributed contain the following information:

Standards of conduct regarding unlawful possession or distribution of illicit drugs and abuse of alcohol by students and employees.

- Applicable legal sanctions.
- Health risks associated with substance abuse.
- Applicable disciplinary sanctions; and
- Available drug and alcohol counseling.

Consistency of Enforcement

All campus departments involved in the enforcement of DAAPP, policies and sanctions implement procedures on an ongoing basis to ensure consistent enforcement. The following highlights enforcement procedures and practice in primary campus departments.

- The Office of Student Success supports the University's educational purpose and goals set forth by interpreting and enforcing standards of student behavior, related policies and procedures. The Office of Student Success strives to facilitate student learning, ethical

development in connection with the student disciplinary process, promote academic integrity and responsible conduct through outreach, and education. The Office of Student Success works to maintain a safe and orderly campus environment.

- Human Resources Description of organization: Human Resources provides services to all employees in the University. These services include, but are not limited to:
 - Benefits, Leaves and Retirement Services
 - Compensation and Classification
 - Employee Relations
 - Human Resources Information Systems (HRIS)
 - Payroll
 - Performance Management
 - Professional Development and Training
 - Compliance

Reporting Violations

A review of the last two Annual Security Reports (covering years 2022 and 2023) as well as the statistics from Campus Safety Incident Reports for 2022 and 2023, relevant documentation from Human Resources, and Student Success Office, indicate that there were no violations related to drug use. There were no violations for alcohol abuse or infractions. There are no known or reported cases of death associated with either alcohol or drug abuse as they may relate to any CIAM community members. CIAM has no on or off campus student housing which may potentially contribute to the low occurrences of alcohol or drug related instances.

Incidents Related to Alcohol and Other Drugs

The following data represents individuals sanctioned for incidents involving alcohol and illegal drugs:

(2023-2024) Alcohol Violations Observed/Reported

Department	2022-2023	2023-2024
Student Success	0	0
Human Resources	0	0

(2023-2024) Drug Violations Observed/Reported

Department	2022-2023	2023-2024
Student Success	0	0
Human Resources	0	0

Sanctions Imposed:

No sanctions were imposed during the 2022-2024 period as there were no reported violations.

Alcohol and Drug Cases	2022-2023	2023-2024
Written Warning	0	0
Disciplinary Probation	0	0
Probated Suspension	0	0
Expulsion	0	0
Not Responsible/ Medical Amnesty	0	0

Review of Cases:

CIAM disciplinary review process is consistent and fair, with appropriate sanctions as outline in the Employee Handbook and Student Conduct policy and violations are handled by Human Resources or the Office of Student Success respectively.

Research Methods:

Research methods include looking at all relevant data (see tables above) and the infraction included in that data, comparing that infraction to our current CIAM policy and evaluating the sanctions imposed based on that policy.

Data Analysis Tools:

Based on the lack of incidents in the years reviewed we conclude that our policy has been followed properly.

Campus Crime and Disciplinary Referral Statistics

In compliance with the Clery Act, in addition to other specific crime categories, liquor law and drug law arrests and disciplinary referrals statistics are collected and reported in the Daily Crime Log and annually compiled and reported in the Annual Security Report. The Annual Security Report, including crime statistics for the previous three years, is available online at: <https://ciam.edu/campus-safety/>.

Offense	Year	Campus Total	Non campus	Public Property
Liquor Law Arrests	2023	0	0	0
Liquor Law Referrals to Disciplinary Action	2023	0	0	0
Drug Law Arrests	2024	0	0	0
Drug Law Referrals to Disciplinary Action	2024	0	0	0

Alcohol and Other Drugs Program Effectiveness Overview

Normative Environment

The campus proactively creates a social and academic environment that supports health promoting norms.

The academic schedule offers graduate course classes on Saturday and Sunday. Academic standards are maintained from admissions standards to academic standards and expectations within the classroom. Faculty expect and require students to attend classes and to actively participate in classroom activities and incentivize high student engagement. Faculty are encouraged and, in some cases, required to engage in a higher level of engagement with students as faculty have

academic advising responsibilities and many serve as advisors.

Alcohol-Free Options

Alcohol-free Venues and Activities

The campus offers alcohol-free settings, including Food shops and a snack shop, and various vending machine options. Non- alcoholic beverages are promoted at events and guidelines for Alcohol use are set forth in the institution's policy.

Alcohol Availability

At CIAM, alcohol use is prohibited in public places. Use of kegs and other similar containers is also prohibited. The university Drug and Alcohol Policy clearly establishes policies and procedures regarding alcohol availability on campus and at university sponsored events. Any infraction of this regulation is an immediate breach of either the Student Conduct Policy or the Employee Handbook and with it carries all necessary consequences up to an including discharge or expulsion from the University

Alcohol availability at off campus venues is not a primary issue, as there is not a highly concentrated number of alcohol outlets and/or outlets offering promotions or specials that promote excessive alcohol consumption adjacent to the university.

Drug Restrictions

The University, consistent with federal, state, and local laws, prohibits the unlawful possession, use or distribution of illicit drugs on its property or as part of any of its activities whether on or off campus. The University will impose sanctions on students or employees that are caught in the act of or been proven to be guilty of abusing drugs on University property. The sanctions will be in keeping with the University regulations on Conduct for employees (see Employee Handbook) and Disciplinary Standards for students "Student Conduct Policy" (see CIAM Course Catalog and Student Handbook). This will include actions that can lead to participation in a substance abuse rehabilitation or treatment program, suspension, dismissal, or termination with referral for prosecution.

To ensure orderly operations and provide the best possible work environment, CIAM expects employees to follow rules of conduct that will protect the interests and safety of all employees and the organization including but not limited to:

- Not working under the influence of alcohol or illegal drugs.
- Not possessing, distributing, selling, transferring, or using alcohol or illegal drugs or abusing a prescription drug in the workplace, while on duty, or while operating employer owned vehicles or equipment; and
- Complying with a request to consent to a required drug or alcohol test.

Review of Alcohol and Other Drug Program Goals

The goals and objectives for the current biennium are listed below along with a status update.

2022 Recommendation	Status
Establish an EAP program for staff	The EAP implemented October 2022
Virtual training for students and staff	This recommendation was not reviewed and will continue to be a recommendation for the next biennium.

Program Strengths and Opportunities for Improvement:

Strengths:

- CIAM's control over alcohol distribution at University functions is comprehensive
- CIAM's policy concerning the ability to have alcohol at University functions is clear and stringent
- CIAM has no recorded instances of alcohol abuse on campus or off
- CIAM has experienced no concerns with regards to illegal drug use
- EAP: Implemented to help employees work through life's transitions from recruitment to retirement, the Employee Assistance Program is offered as part of CIAM's benefits program. EAP provides with helpful guidance, counseling, local resources, or reliable professional care, via phone or internet.

Opportunities for Improvement:

- EAP: Hopeful more employees will take advantage of this free benefit in order to better balance their work and family lives in order to better support our student population.

Recommendations and Goals for next Biennium

- The Alcohol and Drug Policy has not been updated in recent memory. The Committee recommends an institutional update for this policy by August 2025.

Conclusion

The Review concludes that CIAM's DAAPP is effective in promoting a drug-free campus environment. There are no incidents related to substance abuse on campus, and the program demonstrates an effective approach to prevention and awareness. The recommended program improvements will enhance the program's effectiveness and outreach to all segments of the CIAM community.

