The Safe and Drug Free Schools & Campuses Act
(34 C.F.R. Edgar Part 86): Updates and Review
Session IV

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Module 1 Recap

- Describe the history of the DFSCA Compliance Act

- List the primary requirements of the Drug-Free Schools and Campuses Act.

- Explain required elements of certification

- Detail current changes in how the act is monitored and enforced

Module 2 Recap

- Explain required elements (Standards of conduct, Applicable sanctions, health risks, intervention inventory, disciplinary statements) of the Drug and Alcohol Prevention Program Notice

- Identify who should receive the annual notification

- Illustrate best practices of distribution of the Drug and Alcohol Prevention Program Notice

Module 3 Session Objectives

- Discuss what constitutes a substance abuse program in consideration of current science, and evidence based-practices, the NIAAA's New College Alcohol Intervention Matrix (AIM)

- Discuss how institutions may use various professional standards and models in program development and biennial review processes.

Session IV Learning Objectives

- Explain common elements of Biennial Review process/reporting

- Illustrate best practices of Biennial Review Processes

- List potential sources of biennial review information and data which can be collected.

- Stress how important developing and tracking goals and objectives for the future biennium is.

Higher Education Center
for Alcohol and Other Drug Abuse
and Violence Prevention

U.S. Department of Education

COMPLYING WITH THE DRUG-FREE SCHOOLS AND CAMPUSES REGULATIONS

[EDGAR Part 86]

A Guide for University and College Administrators

http://www.higheredcompliance.org/resources/resources/dfscr-hec-2006-manual.pdf

The Biennial Review

The Biennial Review

- The Drug-Free Schools and Campuses Regulations require IHEs to review their AOD programs and policies **every two years**.

- The Department of Education recommends that IHEs conduct the biennial review in even-numbered years and focus their report on the two preceding academic years.

- No specific date in which report is to be filed

The Biennial Review

- Since regulations began in 1990, common for reviews to be conducted during even years

- Review report should be completed and filed by December 31

- Review report should cover the 2 previous academic years

Complying with the DFSC Regulations (2006), p.13

The regulations do not specify a date by which the biennial review must be completed and on file—they simply require that a campus complete a review every two years. Since the regulations went into effect in an even-numbered year (1990), long practice has held that campuses conduct a biennial review by the end of each even-numbered calendar year. Following this tradition and to ensure the production of a useful biennial review in compliance with the DFSCA, good sense suggests that an IHE's biennial review be completed and on file by December 31 of each even-numbered year, and the report should cover the previous two academic years. For example, for the 2006 biennial review, the dates of coverage should include Sept. 1, 2004–Aug. 31, 2005, and Sept. 1, 2005–Aug. 31, 2006.

The Biennial Review

➥ The law further requires an institution of higher education to conduct a **biennial review** of its comprehensive program to:

   ➥ determine its **effectiveness** and implement changes if they are needed

   ➥ ensure that the **sanctions developed are consistently enforced**

Biennial Review Best Practices

- Comprehensive program focused on evidence-based strategies of practice and policies.

- Data collection of students' behaviors and perceptions

- Program focused on meeting needs of students at various levels (drinkers, non-drinkers, problem drinkers)

- Creation of a task-force or campus-based coalition

- Creation of a strategic plan of action

Thorough Biennial Reviews Include

1. A description of AOD comprehensive program/intervention elements and policies
2. A statement of AOD program/intervention and policy **goals and a discussion of goal achievement**
3. Summaries of AOD **program/intervention and policy strengths**
4. Summaries of AOD **program/intervention and policy weaknesses and problems**
5. Procedures for distributing DAAPP Notice to students and employees
6. Copies of the DAAPP Notice distributed to students and employees
7. Recommendations for revising AOD programs
8. Supporting documentation and evidence

HEC Analysis – Model Biennial Reviews

1. Each included materials to compliment the report
2. Each included information on assessment and evaluation of program effectiveness
3. Each detailed goals and goal achievements
4. Each included recommendations for revising programs and policies
5. Each used a task force to complete the review

Reviewing Your Current Campus AOD Survey Data

- Collect and review survey data that describes alcohol and other drug problems and culture

  - CORE Survey

  - National College Health Assessment Survey

  - Other National Surveys Conducted on Your Campus

  - Homegrown Surveys

Reviewing Your Current Campus AOD Survey Data

Many National/State Surveys Collect Data On:

- % Consumed alcohol in past year

- % Consumed alcohol in past 30 days

- % Underage students (<21 years old) consumed alcohol in last 30 days

- % High Risk/Binge Drank in last 2 weeks*

- % Used Marijuana in past year

- % Current Marijuana users (last 30 days)

- % Used illegal drugs (except marijuana) in past year

- % Current illegal drug users (excluding marijuana) (last 30 days)

- Reported some sort of public misconduct due to alcohol or other drug use in past year

Reviewing Your Current Campus AOD Survey Data

Many National/State Surveys Collect Data On:

- Perceived descriptive social norms
- Perceived injunctive social norms
- Actual social norms
- Impacts of others substance use

Reviewing Your Current Campus AOD Data

- Collect and review data that describes alcohol and other drug problems and culture
  - Substance Policy Violations w/in general population and consequences/sanctions administered
  - Clery Data
  - Substance Police Calls for Services
  - Ambulatory Transports resulting from Substance Use
  - Clinical Diagnoses given at Medical Clinic
  - Clinical Diagnoses given at Counseling Clinic
  - ED Reports for Substance Use

Other Possible Data Sources

- Athletic Alcohol and Other Substance Use Violations/Incidents

- Athletic Drug Testing

- Fraternity and Sorority Life Violations/Incidents

- Incidents/Violations at Sporting Events/Tailgates

- Substance Use Related Referral to Employee Assistance Programs

- Substance Use in Classroom

- Requests for permission/authorization for alcohol sales/service

Data indicated within EDGAR Part 86 Contents and Subparts A—General, B, and D

- Tracking the number of **drug- and alcohol-related disciplinary sanctions** imposed;

- Tracking the number of **drug- and alcohol-related referrals** for counseling or treatment;

- Tracking the number **of drug- and alcohol-related incidents** recorded in the logs of campus police or other law enforcement officials; **CLERY DATA**

- Tracking the number of **drug- and alcohol-related incidents of vandalism;**

- Tracking the **number of students or employees attending self-help or other counseling groups related to substance use**; and

- Tracking student, faculty and employee **attitudes and perceptions** about the drug and alcohol problem on campus.

Reviewing Your Current Campus AOD Comprehensive Prevention Program

- Program Inventory
- Interventions Inventory
- Policy Inventory

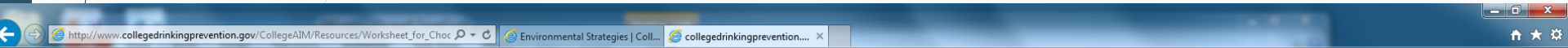# Typology Matrix
Socioecological Model by Network Standards

	Individual	Group	Institution	Community	Policy
Policy					
Education					
Enforcement					
Assessment					
Community Mobilization					

Typology Matrix Socioecological Model by SAMHSA Prevention Strategies

	Individual	Group	Institution	Community	Policy
Info. Dissemination					
Education					
Alternatives					
Problem Identification/Referral					
Community-Based Processes					
Environmental /Policy					

The NIAAA College AIM Worksheet Tool

Reviewing Your Current Campus AOD Prevention Program

- Begin Data Collection/Analysis Where You/Your Campus Is

- Consider including process summary/performance metrics/utilization for each program/intervention:

  - # of times program/intervention delivered

  - # of students/staff/faculty participating/attending

  - Demographic breakdown of attendees

  - Satisfaction survey results

  - Process Summary Comments/Remarks given by those delivering/administering the program

  - Financial Costs of the program

Reviewing Your Current Campus AOD Prevention Program

- Begin Data Collection/Analysis Where You/Your Campus Is
- Assessment vs Evaluation vs Research
  - Assessment
    - The collection, analysis, and interpretation of context-specific data to inform the effectiveness of programs and services; usually guided by theory
    - Usually internally funded and for an internal audience
    - Focuses on sharing findings and offering interpretation of application
  - Evaluation
    - The use of assessment data to determine effectiveness
    - Evaluation requires a judgement to be made – Good/Bad. It worked/It didn't work
  - Research
    - The collection, analysis, and interpretation of data to add to the generalizable knowledge of the scientific community
    - Usually externally funded and for an external audience

Reviewing Your Current Campus AOD Prevention Program

- ➡ Assessment data on student learning outcomes, attitudinal changes, behavior changes gained through programs

- ➡ Evaluation and Research data collected through programs

•*Conduct a biennial review to measure the effectiveness of its drug and alcohol abuse education and prevention programs. The University of South Alabama was required to describe the research methods and data analysis tools that will be used to determine the effectiveness of the program as well as the responsible official or office that will conduct the review. Finally, the biennial review report was to be approved by the University's chief executive and/or its board. The biennial review was to be completed by June 1, 2015 and was to be submitted to the Department by June 15, 2015; and,*

Reviewing Your Current Campus AOD Policies

- Identify and compile all alcohol and other drug related policies for students, staff and faculty

- Look for redundancy, consistency, inconsistency in language

Reviewing Your Current Campus AOD Policies

- Assess how consistently enforced are the policies

- Assess if everyone, regardless of affiliation, is held to the same policy standards and offered the same interventions

- Assess how effective are policies at moving the IHE toward its AOD goals and outcomes

Policy Inventory

- Measuring Enforcement Consistency
  - DOE/HEC recommends submitting a chart that ID's each case and presents particulars of each offense
  - Documenting level of effort expended to detect violations
  - Document level of expertise of those responsible for detecting/adjudicating AOD offenses

Minor In Possession Violation

Case	Athlete	Fine	Paper	Educational Class	BASICS
1	N	X		X	
2	N	X		X	
3	Y		X		
4	N	X		X	
5	N	X			X
6	N	X			
7	Y		X		
8	N	X	X		
9	Y		X		
10	N	X			X
11	N	X		X	

Determining SWOT

- Strengths
- Weaknesses
- Opportunities
- Threats

Review Conclusions

- Outcomes, goals, and objectives for the coming Biennial Period

- Recommended changes in programming, policy, and enforcement.

IHEC Suggested Review Report Contents

- Introduction/Overview
- **Biennial Review Process**
- AOD Comprehensive **Program Goals and Objectives for Biennium being reviewed**
- Annual DAAPP Policy Notification Process
- AOD Prevalence and Incidence Rate Data
- AOD Needs Assessment and Trend Data
- AOD Policy, Enforcement & Compliance Inventory & Related Outcomes/Data
- AOD Intervention Inventory & Related Outcomes/Data
- AOD Goal Achievement and Objective Achievement
- AOD Strengths and Weaknesses
- Recommendations for next Biennium
- Goals and objectives for next Biennium

Who Should Be Responsible for Overseeing BR

- Dept of Education does not specify; this is an institutional choice
  - Prevention Office
  - Clery Compliance Officer
  - VPSA
  - General Counsel
  - Academic Entities (Health and Human Services Colleges)
- Dept of Education does strongly recommend that the institution designate a DFSCA Compliance Officer, similar to what is required by Clery with the Clery Compliance Officer

Committee/Task Force

- If there is an existing Substance Use Coalition/Task Force – use that

- If there is not an existing Task Force – Coalition, this is a great starting activity

- Many hands make light work

- Increased accessibility for data collection

  - Personal Involvement – reduces potential trust issues

  - Existing relationships

- Reduces siloing

- Reduces biases which may result from one individual

The Usual Suspects

- Substance Use Prevention Practitioners
- Health Education/Promotion/Wellness
- Clery Compliance Officer University Police
- Dean of Students
- Student Conduct
- Counseling
- Health Services
- Residence Life
- New Student Programming/Orientation
- Fraternity and Sorority life
- Intercollegiate Athletics

The Unusual On-Campus Suspects

- Student Government
- Graduate Student Councils
- Staff Senate
- Residence Hall Councils
- Faculty Senate
- Disability Services
- Business Affairs
- Facilities (including BSW's)
- Human Resources
- Academic Deans
- Academic Advising
- International Programs
- Alumni Services

Off-Campus Suspects

- Local Law Enforcement Agencies
- Long-term Residential Groups/Neighborhood Associations
- Mayor's Office
- Liquor Commissioner
- Fire and Paramedic/EMT
- Chamber of Commerce
- Local Hospitality Establishments/Businesses
- Local Marijuana Businesses

Suggested Group Format

- Designated Co-Leaders/Facilitators
- Executive Council with each individual overseeing a sub-group/committee
- Subgroups/committees meet more regular
- Entire group meets on a periodic basis depending on how frequent the subgroups meet
- Chain of Command within Administration
- Senior Level Administrator/Representative/Liaison

Other Considerations

- Formalized vs Informal/Organic
- Established Timelines
- Communication
- Document/Record Collection/Storage
- Document/Record Collection Accessibility
- Institutional Buy-In – Senior Level Administration
- Process when data owners won't share
- FOIA?
- Open Meetings Act

BR Report

- Review/Editing Process
  - Executive Committee vs Entire Group
  - Comment and Feedback Process within Committee/Task Force
  - Comment and Feedback Process within the entire institution/community
- Finalized Approval Process
  - VP
  - President's Council
  - Board of Trustees

Using the BR as a Tool to Leverage Your Comprehensive Program

- The real purpose of the BR process is to demonstrates that you have and/or are working to have an effective AOD prevention program in place, not necessarily bragging about successes.

- Important to share why substance use comprehensive program is important and relevant in light of today's pressing priorities

- Can help address misperceptions about substance use and what the institution is doing to address this issue

- Important to share what you have found is working

- Important to share what you intend to do to maintain

- Important to share what you have found is not working

- Important to share what is needed to improve

- Important to share what support and assistance is needed by specific groups

Possible Audiences

- Administration
- Divisional Gatherings/Meetings
- Governing Bodies and Councils
- Local Community Organizations and Groups
- Town Hall Meetings (SAMHSA Communities Talk Town Hall Meetings)

The Next Biennium

- The BR Process provides a road map with shared/institutionalized goals and objectives

- Helps with priorities and focus

- Gives a starting point for the next biennium review

- On-going process

- Some campuses collect data annually to help remind others

What Do I Do With the Biennial Report & DAAPP Notice

- Unless requested, we currently do not send to Dept of Ed.

- Send copy to President/Senior Level Administrator for signature/certification

- Send signed copy to Financial Aid

- Send copy to grant's office

- Copies to places where someone would think that an alcohol report would be obtained

- Place on-line for public access (many schools are doing, but at this time, it is not required)

Questions?

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