

PHILADELPHIA COLLEGE OF OSTEOPATHIC
MEDICINE

Drug Free Schools and Campuses Regulations
[Edgar Part 86] Biennial Review of Academic Years
2017-2018 and 2018-2019

Report Issued: December 2020

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Introduction to Drug-Free Schools and Campuses Act

The Drug-Free Schools and Campuses Act requires an institution of higher education (IHE) to meet certain conditions to receive funds or any other forms of financial assistance under any federal program. An IHE must certify that it has adopted and implemented a program to prevent the unlawful possession, use, or distribution of illicit drugs and alcohol by students and employees. If audited, failure to comply with the Drug-Free Schools and campuses regulations may cause an institution to forfeit eligibility for federal funding.

In order to certify its compliance with the regulations, an IHE must adopt and implement a drug prevention program to prevent the unlawful possession, use, or distribution of illicit drugs and alcohol by all students and employees both on school premises and as part of any of its activities. Creating a program that complies with the regulations requires the IHE to do the following:

1. Prepare a written policy on alcohol and other drugs;
2. Develop a sound method for distribution of the policy to every student and employee each year;
3. Prepare a biennial review report on the effectiveness of its alcohol and other drug (AOD) programs and the consistency of its policy enforcement; and
4. Maintain its biennial review report on file so that, if requested to do so by the U.S. Department of Education, the campus can submit it.

Compliance with Drug-Free Schools and Campuses Act

In order to be in compliance, a Biennial Review of the Philadelphia College of Osteopathic Medicine ("PCOM" or "College") alcohol and other drug (AOD) related policies and programs was conducted for the prior two academic years 2017-2018 and 2018-2019. The objective of the review as identified by the U.S. Department of Education include:

- Determining the effectiveness of and implementing any needed changes to alcohol and other drug programs; and
- Ensuring that the disciplinary sanctions for violating standards of conduct are enforced consistently.

The president of PCOM is required to supply a signed statement certifying the Biennial Review to acknowledge awareness of the recommendations within the report. Both the president's signed statement and a final copy of the 2020 Biennial Review report,

including a copy of the referenced policies are kept on file, for three years after the fiscal year it was created, in the offices of the Chief Student Affairs Officer, in the event the College is audited by the Higher Education Center for Alcohol and Other Drug Prevention, a designee of the U.S. Department of Education. This report will also be made available online at www.pcom.edu/disclosures/drug-and-alcohol-policies.html. Institutions of Higher Education are not required to submit certification or report to the U.S. Department of Education.

PHILADELPHIA COLLEGE OF OSTEOPATHIC MEDICINE OVERVIEW

Mission

Philadelphia College of Osteopathic Medicine is dedicated to the education of students in medicine, health and behavioral sciences. The College fosters the growth of the osteopathic profession by training physicians through programs of study guided by osteopathic medical tradition, concept and practice. PCOM is committed to the advancement of knowledge and intellectual growth through teaching and research, and to the well-being of the community through leadership and service.

Alcohol and Other Drug Program Goals

PCOM is committed to providing its students and employees with a drug free workplace and campus environment. With an emphasis on prevention and intervention through education, PCOM strives to ensure its students and employees are aware of the dangers of abuse of alcohol and other drugs, have appropriate information and resources to mitigate such abuse, and are subjected to appropriate enforcement regarding the inappropriate or illegal use or abuse of such substances on campus and at PCOM sponsored activities involving PCOM students and/or employees.

BIENNIAL REVIEW COMMITTEE:

The Biennial Review was conducted by a PCOM multidisciplinary committee consisting of the following:

- Christina Mazzella, Chief Human Resources Officer
(Designated representative of Jay Feldstein, D.O. President)
- Christine Keck, Executive Director, Human Resources
- Patience Mason, Chief Student Affairs Officer
- Ruth Conboy, Counselor
- Leanne Henry- Miller, Counselor

- Rolf Dzirson, Director, Department of Public Safety
- Patrick Wolf, Chief Environmental and Occupational Safety Officer
- Michael Lombardo, Executive Director Student Affairs
- Margaret McKeon, Chief Compliance Officer

The committee reviewed the following, for academic years 2017-2018 and 2018-2019: PCOM alcohol and other drug policies, violations, sanctions, AOD information posted on the website at www.PCOM.edu and intranet at www.my.pcom.edu , AOD programming and utilization reports from Carebridge, the no cost student and employee assistance program offered by PCOM.

ANNUAL AOD POLICY NOTIFICATION PROCESS

Student Notification

In the prior two academic years, the AOD policy, College sanctions and applicable legal penalties for drug and alcohol violations were published in the General Student Handbook, Student Code of Conduct section.

The PCOM Student General Handbook was posted and made available to all students on the Student Resources page of the intranet (the platform was *Nucleus* in 2017 then *my.pcom* starting in 2018)

Employee Notification

In the prior two academic years, PCOM's AOD related policies were posted and made available on the Human Resources /Employee Resources page of the PCOM intranet (the platform was *Nucleus* in 2017 then *my.pcom* starting in 2018)

A review of policies, including AOD, was included in new hire orientation in 2018 and 2019. In 2017, new hires were provided an information sheet identifying where the policies could be located on the intranet platform utilized at that time.

General Notification In the prior two academic years, students , employees and the general public were notified about PCOM's AOD program, policy, College sanctions and applicable legal penalties for drug and alcohol violations via postings on the PCOM webpages; Drug and Alcohol policies at www.pcom.edu/disclosures/drug-and-alcohol-policies.html and the *Annual Security and Fire Safety* report at www.pcom.edu/about/departments/security/documents/annual-report.pdf

ALCOHOL AND OTHER TREND DATA

PCOM does not currently participate in assessments or surveys about student's alcohol or drug consumption. Carebridge student and employee de-identified utilization reports for the prior two academic years were collected and reviewed as part of the Biennial Review process. However, that data was not analyzed during those academic years for AOD programming purposes. As such, there is no data to report. (See *Goals and Recommendations for the next biennium*).

ALCOHOL AND OTHER DRUG POLICIES

PCOM is committed to the overall health and safety of students and employees. We strive to maintain a campus free from illegal use, possession or distribution of controlled substances. To this end, PCOM has adopted the following policies:

- PCOM General Student Handbook: Drug and Alcohol Violations
- PCOM Substance Abuse Policy # 2.45
- PCOM Tobacco Free Campus #2.35
- Alcohol Service on PCOM campuses #2.85

Note: Some policies are internal and may only be accessible electronically behind the PCOM firewall.

The administration of employee policies is overseen by the Chief Human Resources Officer in consultation with the appropriate administrative office. The administration of the Student Code of Conduct is overseen by the Chief Student Affairs Officer in consultation with the appropriate academic office.

ADMINISTRATIVE PROCEDURES PRESERVING A DRUG FREE ENVIRONMENT

As a condition of employment, employees must notify PCOM of any conviction for violating a criminal drug statute.

Information on how a conviction for violating a criminal drug statute can impact a student's eligibility for federal financial aid is posted at <https://www.pcom.edu/disclosures/drug-and-alcohol-policies>.

All students and employees are subject to progressive discipline for violation of AOD policy, which are identified in the following:

1. Student Conduct: College Disciplinary Process contained in the General Student Handbook
2. Human Resources Policy # 2.05 Disciplinary Action

Note: The above policies are internal and only accessible electronically behind the PCOM firewall.

ALCOHOL AND OTHER DRUG POLICY ENFORCEMENT

There were no alcohol or drug related incidents reported on campus or at PCOM sponsored events during the time period for this biennial review.

Student AOD Policy Violations and Sanctions

The student Code of Conduct and related AOD policies are enforced for both on and off campus student behavior within the parameters of the written policies and conduct expectations. Students who are found responsible for violating the alcohol or other drug policy may be sanctioned. Sanctions include progressive discipline, up to and including separation from PCOM.

In the previous two academic years, no AOD policy violations based on the General Student Handbook were reported. Programs of study may have specific conduct requirements related to AOD based on clinical, accreditation and state licensure requirements. Program specific violations were not centrally tracked. (*See Goals and Recommendations for the next biennium*)

Employee AOD Violations and Sanctions

The employee Code of Conduct and related AOD policies are enforced for both on and off campus employee behavior within the parameters of the written policies and conduct expectations. Employees who are found responsible for violating the alcohol or other drug policies may be sanctioned. Sanctions include progressive discipline, up to and including termination. In the previous two academic years, no AOD policy violations were identified.

PROGRAMS ADDRESSING AOD USE AND ABUSE

1. Education and Awareness Programs

Students:

In 2017-2018, AOD related programming provided specifically to students was not centrally tracked.

In 2019, new students in the Doctor of Osteopathic Medicine, Biomedical Sciences and Doctor of Pharmacy programs on all campuses were required to complete the following SafeColleges online education modules as part of the orientation process.

- *Drug Awareness and Abuse*

- *Alcohol Awareness*

All returning students had access to these modules through the SafeColleges online learning platform.

Employees:

Beginning in 2018, SafeColleges online education module: *Drug Free Workplace* was accessible to all employees as part of the online education library. This module provides employees with an understanding of drug and alcohol abuse in the workplace, reviews the Drug Free Workplace Act, recognition of the signs of substance abuse and addiction and knowing their role in fighting substance abuse on the job.

2. Support Resources:

During the previous two academic years, AOD support services included the following:

Licensed professional counselors - providing confidential, individual counseling to students at no cost on a short term basis to assist with personal issues, including AOD that may or may not impact their academic success.

Carebridge - a confidential assistance program, offers information and resources, including access to behavioral health assistance, counseling and online tools is provided at no cost to students and employees. Employees and students receive automatic enrollment in Carebridge as part of their benefits package (employees) and enrollment status (students). The Carebridge contact information is easily accessed on the Employee and Student Resources pages of www.my.pcom.edu. Employees are provided Carebridge information annually as part of benefits enrollment.

Carebridge Employee Assistance Programs (“EAP”): De-identified utilization reports for EAP offered free to both students and employees for the previous two academic years were reviewed. The reports include statistical information on Presenting Problem, which include a category for AOD that may be helpful in planning AOD programming based on community need. (*See Goals and Recommendations for the next biennium*)

PROGRAM ASSESSMENT METHOD:

When assessing the AOD programming for this review, the committee focused on the following:

1. Was the programming uniformly provided to all students and staff?
2. Was the annual AOD notification provided in an effective manner to ensure it was delivered to and read by all intended recipients?

3. Were students and staff aware of the AOD programming and supports offered by the College?
4. Is the College utilizing available education platforms and analytics to guide programming and identify needs?

REVIEW OF CURRENT ALCOHOL AND OTHER DRUG PROGRAMS:

Strengths

- PCOM offers Carebridge support services to all students and staff free of charge.
- As of 2019, PCOM has utilized SafeColleges, an online learning platform to deliver and make available AOD awareness training to students and employees.

Opportunities

- PCOM relies on publication of AOD policies on the web and intranet to serve as notice to students and staff. Direct, individualized notice rather than general publication may increase the effectiveness of the communication and create uniformity in messaging.
- Carebridge utilization reports for students and staff, currently available were not reviewed for purposes of trending AOD support or future programming needs. Review of the data on an ongoing basis may be helpful in developing programs and increasing awareness of PCOM community needs related to AOD.
- The PCOM online learning platform, adopted in 2018, was not utilized in a uniform manner to provide AOD education to staff or returning students.

Challenges

PCOM has not undertaken a formal assessment of student and employee’s awareness of AOD programming and supports available through the College. Having such feedback may assist in enhancing AOD programming and effective distribution and publication of available supports.

GOALS AND OBJECTIVES FOR NEXT BIENNIUM

<u>Goal</u>	<u>Status</u>	<u>Recommendation</u>
Effective Policy Distribution		
Ensure effective distribution of AOD policies to each student and employee every year	AOD policies are published and accessible on the PCOM website, intranet and in the General Student Handbook	Implement direct distribution of the AOD policies using PCOM email or other distribution system, i.e. Banner

		Schedule AOD Policy distribution in April each year to coincide with National Alcohol Awareness month
Increase awareness of AOD programming and support resources		
Increase awareness among students of AOD programming and supports available through the College and external resources.	In 2020, the PCOM Counseling Office created a <i>Student Mental Health and Wellness Resource</i> page: posted on the PCOM intranet. This page provides a list of resources both on and off campus addressing mental health and wellness, specifically including addiction, alcohol and other drug intervention assistance programs in the community.	Increase awareness of this comprehensive student resource page among new and returning students by featuring this page in PCOM Community announcements throughout the year and targeted emails to students Schedule delivery of AOD awareness programming in April each year to coincide with National Alcohol Awareness month
Increase awareness among employees of AOD programming and supports available through the College and external resources.	Information regarding Carebridge support services can be accessed by employees on the Employee Resource page of my.pcom.edu and is distributed annually during benefits open enrollment period.	Develop an <i>Employee Mental Health and Wellness Resource</i> page on my.pcom.edu as a central location for resources both on and off campus addressing mental health and wellness, specifically including addiction, alcohol and other drug intervention assistance programs in the community Increase awareness of AOD support services among employees by PCOM Community announcements throughout the year and targeted emails to employees. Schedule delivery of AOD

		awareness programming in April each year to coincide with National Alcohol Awareness month
AOD Policy Violations		
Track program specific AOD violations by students to ensure consistent application of imposed sanctions	Due to clinical, accreditation and state licensure requirements, program of study may have additional requirements related to reported AOD violations	Central tracking of program specific AOD violations and any associated sanctions to ensure consistent imposition of program sanctions
AOD Education		
Provide all students and employees with AOD education annually	Currently, AOD training is not provided uniformly to all students and employees. <i>Note:</i> In compliance with the Title IX Final Rule, the PCOM Sexual Harassment (Title IX) Policy #1.38 was updated [effective August 13, 2020] to include student amnesty for violation of alcohol and/or drug use related to reporting of suspected sexual misconduct	Utilize PCOM's online training platform, SafeColleges to track and consistently assign AOD education modules and policy updates to new students and employees as an onboarding requirement and to returning students and existing employees annually. Schedule delivery of AOD educational programming in April each year to coincide with National Alcohol Awareness month
AOD Programming		
Track AOD programming for students and employees	AOD programming offered at PCOM to students and employees is not currently tracked in a centralized manner to identify program delivery to students and employees. Tracking would assist the College in identifying potential AOD education and resource needs.	AOD programming offered through PCOM should be tracked by Student Affairs (students) and Human Resources (employees) and reported to the Biennial Review Committee annually to assist with development of future programs and identify PCOM community needs.

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To track and meet the goals set forth in this document, the Committee will meet twice a year to review AOD programming for students and staff, compliance with distribution of AOD policies and review Carebridge utilization report.

END

DRUG FREE SCHOOLS AND CAMPUSES BIENNIAL REVIEW

SIGNATURE PAGE

I have reviewed and approved the contents of this 2020 Biennial Review.



Jay S. Feldstein, DO
President and Chief Executive Officer
Philadelphia College of Osteopathic Medicine



Date