

PHILADELPHIA COLLEGE OF OSTEOPATHIC MEDICINE

Drug Free Schools and Campuses Regulations
[Edgar Part 86] Biennial Review of Academic Years
2021-2022 and 2022-2023

Report Issued: December 2024

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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 2021-2022 and 2022-2023.

The objective of the review as identified by the U.S. Department of Education includes:

- 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 2024 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)
- Patience Mason, Chief Student Affairs Officer
- Leanne Henry- Miller, Sr. Associate Director, Counseling
- Paula Dampier, Director, Department of Public Safety, Georgia
- Terri Allen, Director, Department of Public Safety, Philadelphia
- Patrick Wolf, Chief Environmental and Occupational Safety Officer
- Michael Lombardo, Executive Director Student Affairs

- Danielle McNichol, Interim Chief Compliance Officer

The committee reviewed the following, for academic years 2021-2022 and 2022-2023: 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 distributed to the pcom.edu email address of each new and returning student and made available to all students on the Student Resources page of the PCOM intranet, my.pcom.edu.

The AOD policy, College sanctions and applicable legal penalties for drug and alcohol violations was also distributed to student pcom.edu email addresses on August 9, 2023.

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, my.pcom.edu.

A review of policies, including AOD, was included in new hire orientation in 2021, 2022 and 2023.

The AOD policy, College sanctions and applicable legal penalties for drug and alcohol violations was distributed to all staff and faculty pcom.edu email addresses on November 22, 2023.

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 2021-2022 and 2022-2023, which includes "Addictions" as a primary presenting problem category, were reviewed by Human Resources for employees and Student Affairs for students. That data lists the number and percentage of all new cases reported under the "Addiction" category, including a subcategory for "Alcohol" or "Other".

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
- PCOM Code of Conduct

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. All PCOM Community Members, including students and employees are required to adhere to the standards set forth in PCOM's Code of Conduct.

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.

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 2021- 2022 and 2022-2023, all new and returning students on all campuses were required to complete the following Vector LMN online education modules as part of the orientation process.

- *Drug Awareness and Abuse*
- *Alcohol Awareness*

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

Employees:

Vector MLN 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 <https://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 Addiction, which can be utilized for development of AOD awareness programming. (*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.
- PCOM utilizes Vector LMN, an online learning platform to deliver and make available AOD awareness training to students and employees. This included the modules, *Drug Awareness and Abuse* and *Alcohol Awareness* which is assigned to all new students at orientation and all returning students annually.
- In addition to the annual online modules identified above, a list of AOD education and awareness programs provided to students is maintained in the Student Affairs Office.
- Per a goal identified in the 2020 Biennial Report, the PCOM Counseling Office created a *Student Mental Health and Wellness* resource page, posted in the Student Resources section of my.pcom.edu. 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.
- Per a goal identified in the 2020 Biennial Report, PCOM Human Resources posts *Alcohol Awareness Resources and Intervention Assistance* information on the Employee Resources pages of my.pcom.edu
- In Spring 2021, PCOM Human Resources conducted an *Employee Mental Health and Wellness Survey*, which included questions on whether the employee knew how and where to access Mental Health Services at PCOM.

Opportunities

- Carebridge utilization reports for students and staff, currently available, contain de-identified information that may be useful for purposes of trending AOD support or future programming needs. Review of the data on an ongoing basis may be helpful in tracking trends in reporting issues, developing programs and increasing awareness of PCOM community needs related to AOD.

GOALS AND OBJECTIVES FOR NEXT BIENNIUM

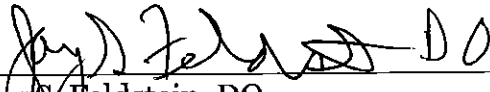
<u>Goal</u>	<u>Status</u>	<u>Recommendation</u>
Increase awareness of AOD programming and support resources		
Increase awareness among students of AOD programming and supports available through the College and external resources.	In 2022, Student Affairs conducted a <i>Student Mental Health and Wellness</i> survey, which included questions on knowing where and how to access mental health services at PCOM.	Utilize de-identified data, available from the survey to assess targeted AOD education, and resource awareness needs of students.
Increase awareness among employees of AOD programming and supports available through the College and external resources.	In 2021, Human Resources conducted an <i>Employee Mental Health and Wellness</i> survey which included questions on where and how to access mental health services at PCOM	Utilize de-identified data, available from the survey to assess targeted AOD education, and resource awareness needs of employees.
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	Tracking of program specific AOD violations and any associated sanctions to ensure consistent imposition of program sanctions.

To track and meet the goals set forth in this document, the Committee will meet twice a year to review PCOM Community’s awareness of available support and educational resources, develop AOD prevention programming for students and staff, and compliance with distribution of AOD policies.

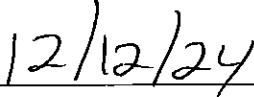
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DRUG FREE SCHOOLS AND CAMPUSES BIENNIAL REVIEW
SIGNATURE PAGE

I have reviewed and approved the contents of this 2023 Biennial Review.



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



Date