

Adult & Community Education, Columbus City Schools

Alcohol and Other Drug Abuse Prevention Program Biennial Plan

2022 - 2024

Adult & Community Education
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Overview and Purpose

The purpose of the Drug and Alcohol Abuse Prevention regulations (Code of Federal Regulations, Section 86) is to implement section 22 of the Drug-Free Schools and Communities Act Amendments of 1989, which added section 1213 to the Higher Education Act. These amendments require that, as a condition of receiving funds or any other form of financial assistance under any federal program, an institution of higher education (IHE) must certify that it has adopted and implemented a drug prevention program (<https://www.ecfr.gov/current/title-34/subtitle-A/part-86>). As defined in 34 CFR 600.6, Adult & Community Education (ACE), Columbus City Schools is considered a postsecondary vocational institution that must develop and implement a drug and alcohol prevention program that complies with this requirement.

Adult & Community Education, Columbus City Schools recognizes that substance abuse is an unmanageable, yet treatable condition and disease that affects the lives of individuals. Substance abuse may lead to health and safety risks in the school and workplace. To that end, ACE is committed to implement programs intended to reduce and eliminate the abuse of drugs and alcohol.

As a one-building, non-residential campus, ACE does not host events or activities that provide or promote the use of alcohol. Per Columbus Board of Education Rule 3122.01, the manufacture, possession, use, distribution, or dispensing alcohol on school grounds is prohibited.

Biennial Review

Adult & Community Education (ACE), Columbus City Schools has established a committee to conduct a Biennial Review of its drug and alcohol prevention program. The Biennial Review covers academic years 2022-2023 and 2023-2024. Committee members include the following Adult & Community Education staff:

- Director
- Compliance Coordinator
- Financial Aid Coordinator
- Operations Coordinator
- Practical Nursing Program Administrator
- Resilience Coach

The Committee conducted the Biennial Review process in May 2022.

Data Analyzed for the Biennial Review

Data from employee and student policies, departmental records, and campus data were analyzed and used to inform this report. Local data revealed that in the 2021-2022 academic year, one student was withdrawn and dismissed from the Practical Nursing program due to violation of ACE's alcohol and drug policies. Campus data from 2018-2020 from the U.S. Department of Education Campus Safety and Security report (<https://ope.ed.gov/campussafety/#/institution/list>) provide a comprehensive list of criminal offenses reported both on campus and on surrounding public property.

Student Policies

The Practical Nursing program complies with all Ohio Board of Nursing rules codified in Ohio Administrative Code, State Board Rule 3701-60-07 and 173-9-07, which govern background investigations of students, including drug screening.

The purpose of a background investigation is to maintain a safe and productive educational and clinical environment. Students who refuse to comply with the background investigation process will be denied admission to the Practical Nursing program.

After program orientation and before the first day of class, students must complete and have a negative drug screen. Random drug testing may be requested by the program administrator and/or the clinical facilities during a student's participation in the program or prior to re-admission into the program.

Procedures Used for Disqualifying Offenses

Offenses in Tier I, Tier II, Tier III, or Tier IV specified in the Ohio Administrative Code 3701-60-07 may disqualify an individual for any position that would include the care of children and older adults. Please refer to the following link for disqualifying offenses: <http://codes.ohio.gov/oac/3701-60-07>.

If the background investigation reveals information that could be relevant to the application, the program administrator may request additional information from the applicant. The potential disqualifying offense shall be reviewed on a case by case basis. The Columbus School of Practical Nursing program reserves the right to withdraw/dismiss a student in the event a disqualifying offense is revealed during any point of the application process/enrollment. Students may be subject to random or for cause drug screens. Refusal to comply with such a request will result in immediate withdrawal/dismissal.

Clinical facilities may also choose to require additional background checks, drug screens and/or fingerprinting, and may disqualify students from participating at a clinical site based on individual facility policies independent of any action by the Columbus Practical Nursing program and that a disqualifying background check from a clinical agency may subject applicants/current students to dismissal from the Columbus Practical Nursing program. Any additional drug screening will be at additional cost to the student. Columbus School of Practical Nursing students who have any misdemeanor or felonies related to the disqualifying charges will be denied admission to or dismissed from the program.

Student Conduct while Providing Nursing Care

In keeping with Chapter 4723 of the Ohio Revised Code which regulates nursing practice, Practical Nursing students are responsible for maintaining standards while providing nursing care. Failure to maintain standards of nursing practice or professional boundaries with patients will be grounds for probation or dismissal. With regard to the use of drugs and alcohol, a student shall not:

- Self-administer or otherwise take into the body any dangerous drug, in any way not in accordance with a legal, valid prescription issued for the student.
- Habitually indulge in the use of controlled substances, other habit-forming drugs, or alcohol or other chemical substances to an extent that impairs ability to practice.
- Have impairment of the ability to practice according to acceptable and prevailing standards of safe nursing care because of habitual or excessive use of drugs, alcohol, or other chemical substances that impair the ability to practice.

To assure and safeguard clinical nursing care, faculty are responsible to assign, evaluate and supervise students in the clinical area, this includes identifying and documenting performance deficiencies, developing/communicating plans to manage the issue(s), and reporting issues/plans to the administrator, or designee.

The student may be dismissed from the clinical experience by the instructor or the clinical agency's manager if the student is deemed to jeopardize patient/staff welfare or is unable to fulfill expectations and/or standards. In that event, a review of the issue will be held by the Program Administrator, the agency representative, the faculty member and the student to determine further action. Action may include remediation, lab experience, probation, suspension, or termination depending on the nature and/or severity of issues involved.

Students who unlawfully possess, use, or distribute illegal drugs or alcohol will be in violation of school policy and will be subject to disciplinary action consistent with local, state, and federal law, including possible suspension or expulsion from Adult & Community Education, Columbus City Schools.

Employee Policies

To ensure orderly operations and provide the best possible work environment, Columbus City Schools expects employees to follow rules of conduct that will protect the interests and safety of all employees, students, and the school district. Adult & Community Education, Columbus City Schools abides by drug-free workplace policies established by Columbus City Schools. Per Columbus Board of Education Rule 3122.01, the Board shall not permit the manufacture, possession, use, distribution, or dispensing of any controlled substance, alcohol, and any drug paraphernalia as the term is defined by law, by any member of the District's professional staff at any time while on District property or while involved in any District-related activity or event. Any staff member who violates this policy shall be subject to disciplinary action in accordance with District guidelines and the terms of collective bargaining agreements.

The Superintendent shall establish guidelines that ensure compliance with this policy and to ensure that each staff member is given a copy of the standards regarding unlawful possession, use, or distribution of illicit drugs and alcohol by staff and informed that compliance with this requirement is mandatory. Such guidelines shall provide for appropriate disciplinary actions, if and when needed, which comply with the terms of any negotiated agreement.

Working under the influence of alcohol or illegal drugs or the possession, distribution, sale, transfer, or use of alcohol or illegal drugs on school property, while operating school vehicles or equipment, or while on school business is strictly prohibited. Staff who unlawfully possess, use, or distribute illegal drugs or alcohol will be in violation of district policy and will be subject to disciplinary action, including possible suspension.

Board of Education Rule 3170 recognizes alcoholism and drug abuse as treatable illnesses. Such illnesses may impair the performance of professional staff members. When appropriate, the Board may assist such employees in a manner recommended by appropriate specialists in the treatment of those illnesses and according to the Substance Free Workplace Program Memorandum of Agreement.

A professional staff member having an illness or other problem relating to the use of alcohol or other drugs including controlled substances, medications not prescribed by the employee's physician, or medications not taken as prescribed, will receive the same careful consideration and offer of assistance presently extended to professional staff members having any other illness.

The responsibility to correct unsatisfactory job performance, attendance or behavioral problems resulting from a suspected health problem rests with the professional staff member. Additionally, regardless of whether a professional staff member has an illness or other problem relating to the use of alcohol or other drugs, it remains the responsibility of the professional staff member to report to work and perform his/her duties in a fit and appropriate condition at all times. Being under the influence of alcohol or other drugs while on duty, on school property, or at a school related activity/event is not acceptable. Failure to correct unsatisfactory job performance, attendance or behavior and/or working or reporting to work under the influence of alcohol or other drugs will result in appropriate corrective or disciplinary action as determined by the Board, up to and including termination.

If a professional staff member sustains a workplace injury while s/he is under the influence of alcohol or a controlled substance not prescribed by his/her physician, s/he may be disqualified for compensation and benefits under the Workers Compensation Act. If the professional staff member tests positive or refuses to submit to a test for alcohol and/or other drugs after sustaining a workplace injury, the employee may dispute or prove untrue the presumption or belief that alcohol and/or other drugs are the proximate cause of the injury (i.e., rebuttable presumption). The Board directs the Superintendent to establish guidelines and post a notice advising employees that the results of, or the employees refusal to submit to an alcohol or other drug test may affect an employee's right to receive workers' compensation benefits.

No professional staff member will have his/her job security or promotion opportunities jeopardized by his/her voluntary request for counseling or referral assistance.

Professional staff members who suspect they may have an alcohol or other drug abuse problem are encouraged to seek counseling and information on a confidential basis by contacting resources available for such service.

Use of Tobacco Products

Use of tobacco products is not permitted in any campus building or on any school grounds. All staff should work to promote adherence to this policy. Smoking is not permitted on school grounds or in front of the Adult & Community Education building.

Per Columbus Board of Education Rule 3215 (use of tobacco by professional staff), Rule 4215 (use of tobacco by classified staff), and Rule 1615 (use of tobacco by administrators), the "use of tobacco" means to chew or maintain any substance containing tobacco, including smokeless tobacco, in the mouth to derive the effects of tobacco, as well as all uses of tobacco, or tobacco substitutes, including cigars, cigarettes, pipe tobacco, chewing tobacco, snuff, any other matter or substances that contain tobacco, in addition to papers used to roll cigarettes and/or smoking of electronic, "vapor," or other

substitute forms of cigarettes, clove cigarettes and any other lighted smoking devices for burning tobacco or any other substances.

In order to protect students and staff who choose not to smoke or use tobacco from an environment noxious to them, and because the Board does not condone smoking or the use of tobacco, the Board prohibits the use of tobacco or tobacco substitute products by professional staff members at all times within any enclosed facility owned or leased or contracted for by the Board, and in areas directly or indirectly under the control of the Board immediately adjacent to locations of ingress or egress to such facilities. This prohibition extends to any Board-owned and/or operated vehicles used to transport students and to all other Board-owned and/or operated vehicles. Such prohibition also applies to school grounds and other Board owned property.

Use of Drugs and Alcohol Products

Staff shall not knowingly possess (including in purses, wallets, automobile, desks, etc.), buy, sell, use or transmit any narcotic drug, hallucinogenic drug, amphetamine, barbiturate, marijuana, tranquilizer, prescription drug, alcoholic beverage, drug paraphernalia, intoxicant, or mood-altering chemical of any kind. (Exception: Prescription drugs that are required may be in the possession of the person for whom the prescription is written.) It is not acceptable for any staff member to report to his/her place of work with an odor, appearance, or behavior that indicates use of alcohol or any substance abuse.

Whenever an administrator has facts reasonably indicating a particular staff member is under the influence of drugs or alcohol at school or at a school activity, the staff member may, at the discretion of the administrator, be directed to undergo drug or alcohol testing. Before directing the staff member to undergo testing, the administrator must first explain to the staff member the grounds of his or her suspicion, that a test may be required, the consequences for refusing to undergo testing, and then offer the staff member a chance to voluntarily submit to the test. If the staff member refuses to comply with the administrator's directive to undergo reasonable suspicion-based testing, the refusal shall subject the staff member to dismissal.

Resources

Following the Ohio Board of Nursing Guidance and Counseling Policy 4723-5-12 (A-B), the Columbus School of Practical Nursing recognizes that many factors have an effect on students' ability to complete the program. To assist students in dealing with some of these factors, including the use of tobacco and alcohol products, the School of Practical Nursing provides for the following:

- The program administrator and instructors have office hours for individual conferences with students to discuss performance issues and to provide academic counseling.
- Students may initiate conferences with instructors at any time throughout the course by scheduling with the instructor.
- Instructor-initiated conferences with a student may be arranged whenever the instructor deems it necessary to assist a student in meeting individual or school objectives.
- Scheduled conferences between the instructor and a student are routinely conducted at the conclusion of each clinical experience.
- Students may also seek counsel through the program administrator, regarding personal issue of needs. If necessary, outside counseling may be recommended.

Additionally, a part-time Resilience Coach who offers face-to-face and virtual services and supports to students is employed by Adult & Community Education, Columbus City Schools.

Before their first Trimester commences, all Practical Nursing students are required to attend a week-long Student Success course. As part of this course, the ACE Resilience Coach offers sessions in topics related to the use of drugs and alcohol products, including the causes of stress and strategies to manage stress; the benefits of maintaining a healthy lifestyle as a strategy to improve learning; and the availability of resources within ACE and the community.

Employee Assistance Program

Columbus City Schools offers to employees, their dependents, parents, and parents-in-law no-cost, confidential, 24/7 assistance with personal, family and work issues to employees and their families, including, but not limited to support for additional problems.

Annual Notification Process for ACE's Alcohol and Drug Abuse Prevention Policy

Notification to Adult & Community Education students and staff of the Drug and Alcohol Abuse Prevention policies is provided in the following ways:

- Via email to all registered Practical Nursing students each trimester from the Practical Nursing Program Administrator (Appendix A);
- Inclusion in the Practical Nursing Student Handbook;
- Via email annually to all new and returning part-time and full-time staff from the ACE Director (Appendix B);
- Inclusion in the ACE Staff Handbook; and
- On the ACE website as part of the Jeanne Clery Act Annual Security Report.

Analysis of ACE's Alcohol and Drug Abuse Prevention Program

In May 2022, the ACE Biennial Review Committee conducted a thorough analysis of its drug and alcohol policies, as well as its related programs and supports.

During the program review, the Committee identified the following strengths of the ACE Alcohol and Other Drugs (AOD) Prevention program:

1. Employment of a Resilience Coach to provide support, guidance, and counseling to students and staff, both virtually and in person;
2. Provision of local AOD resources to all students during Student Success class (i.e., new student orientation); and
3. Ongoing coaching by Resilience Coach to students enrolled in Trimester 1 and 2 on topics related to trauma and its impact on learning.

The Committee identified the following areas for improvement and the associated staff members to lead the work.

1. Development of a policy that requires students who are on provisional status due to documented substance abuse meet with the Resilience Coach as a condition of continued enrollment (Practical Nursing Administrator and Resilience Coach);

2. Requirement that students who withdraw or are dismissed from the Practical Nursing program for any reason meet with the Resilience Coach (Practical Nursing Administrator and Resilience Coach);
3. Inclusion of Resilience Coach in practical nursing faculty meetings when appropriate (Practical Nursing Administrator and Resilience Coach);
4. Creation and provision of ACE's AOD Prevention program brochures in building hallways and during Student Success class (Compliance Coordinator, Resilience Coach, Financial Aid Coordinator);
5. Posting ACE's AOD Prevention program in Canvas (ACE Learning Management System) (Compliance Coordinator and Practical Nursing Administrator);
6. Creation and distribution of a student barrier assessment to identify non-academic barriers to student learning (Resilience Coach; Communications Coordinator; Aspire Instructor);
7. Identification of designated staff member who communicates AOD policies to students and staff (Compliance Coordinator).

Conclusion

Adult & Community Education, Columbus City Schools is committed to proactively address drug and alcohol issues on campus and will continue to use data and research to drive its practices to provide a safe and healthy environment for students and staff.

Appendix A

Dear Columbus School of Practical Nursing Student:

As you begin this trimester at Adult & Community Education (ACE), Columbus City Schools, I would like to remind you of our policies related to tobacco, drug, and alcohol use. To foster a safe and healthy campus and classroom environment for students and staff, ACE implements a Drug and Alcohol Prevention Program for all students and staff. As part of this program, it is our obligation to regularly inform you of ACE's tobacco, drug, and alcohol policies, as well as available resources and supports.

Policies

The Columbus School of Practical Nursing complies with all Ohio Board of Nursing rules, including Rule 3701-60-07 (<https://codes.ohio.gov/ohio-administrative-code/rule-3701-60-07>) and 173-9-07 (<https://www.law.cornell.edu/regulations/ohio/Ohio-Admin-Code-173-9-07>) which govern requirements for background checks of prospective students. Additionally, when abiding by the list of disqualifying offenses for an individual for any position that includes the care of children and older adults, ACE complies with the list identified by the State of Ohio, found here: <http://codes.ohio.gov/oac/3701-60-07>.

In keeping with Chapter 4723 of Ohio Revised Code, practical nursing students are responsible for maintaining state standards while providing nursing care (<https://codes.ohio.gov/ohio-revised-code/search?start=1&pageSize=25&sort=BestMatch&keywords=nursing+practice>), including prohibition to:

- self-administer or otherwise take into the body any dangerous drug, in any way not in accordance with a legal, valid prescription issued for the student;
- habitually indulge in the use of controlled substances, other habit-forming drugs, or alcohol or other chemical substances to an extent that impairs ability to practice; and
- have impairment of the ability to practice according to acceptable and prevailing standards of safe nursing care because of habitual or excessive use of drugs, alcohol, or other chemical substances that impair the ability to practice.

Use of Tobacco Products

Following the Columbus City Schools' district policy, the use of any type of tobacco products is not permitted in any campus building or on any school grounds.

Resources

Following the Ohio Board of Nursing Guidance and Counseling Policy 4723-5-12 (A-B), the Columbus School of Practical Nursing recognizes that many factors have an effect on students' ability to complete the program. To assist students in dealing with some of these factors, including the use of tobacco and alcohol products, the School of Practical Nursing provides students the following services and supports:

- The program administrator and instructors have office hours for individual conferences with students to discuss performance issues and to provide academic counseling.

- Students may initiate conferences with instructors at any time throughout the course by scheduling with the instructor.
- Instructor-initiated conferences with a student may be arranged whenever the instructor deems it necessary to assist a student in meeting individual or school objectives.
- Scheduled conferences between the instructor and a student are routinely conducted at the conclusion of each clinical experience.
- Students may also seek counsel through the program administrator, regarding personal issues of needs. If necessary, outside counseling may be recommended.
- The Substance Abuse and Mental Health Services Administration (SAMHSA) provides substance use and mental disorder information, services, and research: <https://www.samhsa.gov/>.
- Local resources can be located here <https://mhaohio.org/category/alcohol-drug/>.
- Treatment options for substance abuse can be located here: <https://findtreatment.gov/results>.

ACE Resilience Coach

Additionally, the services and supports of a Resilience Coach are offered to Practical Nursing students who may face challenges or have questions related to drug and alcohol abuse.

I hope you find this information helpful. If you have any questions, please contact our main office at 380-997-7639 or the ACE Resilience Coach at 380-997-7638. We are committed to supporting you as a student at Adult & Community Education.

Sincerely,

Dr. Patricia Harris
Columbus School of Practical Nursing Program Administrator
Adult & Community Education, Columbus City Schools

Appendix B

Dear Adult & Community Education Staff:

To foster a safe and healthy campus and classroom environment for students and staff, Adult & Community Education (ACE), Columbus City Schools implements a Drug and Alcohol Prevention Program for all students and staff. As part of this program, it is our obligation to regularly inform you of ACE's tobacco, drug, and alcohol policies, as well as available resources and supports.

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I hope you find this information helpful. If you have any questions, please contact our main office at 380-997-7639 or the ACE Resilience Coach at 380-997-7638. We are committed to supporting you as a staff member at Adult & Community Education.

Sincerely,

Edward O'Reilly
Director, Adult & Community Education
Columbus City Schools