

Grace College and Seminary
Drug-Free Schools and Campuses Regulations [Edgar Part 86]
Biennial Report for Alcohol and Other Drug Abuse Prevention Program
Calendar Years 2017 and 2018

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September 4, 2019

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"To Know Christ and to Make Him Known"

Table of Contents

INTRODUCTION.....	1
BIENNIAL REVIEW PROCESS.....	2
ANNUAL POLICY NOTIFICATION PROCESS.....	3
AOD PREVALENCE RATE, INCIDENCE RATE, NEEDS ASSESSMENT AND TREND DATA.....	4
AOD POLICY, ENFORCEMENT & COMPLIANCE INVENTORY & RELATED OUTCOMES/DATA.....	6
AOD PROGRAM ELEMENTS	7
Alcohol and Drug Free Events and Facilities	8
Direct Program Interventions	9
Normative Environment.....	10
Athletics Direct Program Interventions	12
Policy Development and Enforcement	12
2017 Campus Climate Survey.....	13
Collaboration with Law Enforcement	14
AOD STRENGTHS AND WEAKNESSES.....	14
Strengths of Policies and Programs.....	14
Weaknesses of Policies and Programs	15
Opportunities for Policies and Programs	15
Appendix A: Legislation	19
Appendix B: Student Policy	21
Appendix C: Athletic Department Policy.....	27
Appendix D: Employee Policy.....	29
Appendix E: Community Lifestyle Expectations	36
Appendix F: Compliance Checklist	38
Appendix G: Pro-Health Programming for Employees.....	41

Certification Statement

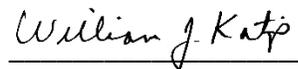
Drug-Free Schools and Communities Act (DFSC)
Alcohol and Other Drug (AOD) Report
Biennial Program Review

I have reviewed the Grace College and Seminary *Biennial Report for Alcohol and Other Drug Abuse Prevention Program* as federally mandated by the Drug-Free Schools and Communities Act of 1989 and subsequent legislation for institutions of higher education that receive any form of financial assistance under any federal program, including the federally-funded or guaranteed student loan program.

Grace has adopted and implemented policies, a milieu, and lifestyle expectations to prevent the unlawful possession, use, or distribution of illicit drugs and alcohol, or the irresponsible use legal substances, by students and employees on the institution’s premises or in conjunction with institution-related activities.

This review meets the federal mandates requiring notification of students and employees, communication of sanctions for violations, description of health risks and treatment programs, reliable methods to distribute annual notifications, and a biennial review of AOD programs and policies.

I have authorized the review committee to pursue implementation of this report’s recommendations.

	9/3/19
William J. Katip, President	Date
Grace College and Seminary	

INTRODUCTION

Grace College and Seminary, including all locations it operates, is an alcohol, tobacco, and substance abuse free institution.

The Higher Education Act of 1965, as amended by the Drug-Free Schools and Communities Act of 1989 ([Appendix A](#)), requires that any institution of higher education receiving federal financial assistance adopt and implement a program to prevent the use of illicit drugs and alcohol abuse by students and employees (20 U.S.C. 1145g—Drug and Alcohol Abuse Prevention).

Pursuant to this requirement, the Department of Education General Administrative Regulations (EDGAR) 34 C.F.R. Part 86 mandate that colleges and universities¹:

1. Annually distribute the following in writing to all students and employees:
 - a. Standards of conduct that clearly prohibit the unlawful possession, use or distribution of illicit drugs and alcohol by students and employees.
 - b. A description of the legal sanctions under local, state, or federal law for the unlawful possession or distribution of illicit drugs and alcohol.
 - c. A description of any drug or alcohol counseling, treatment, or rehabilitation, or re-entry programs that are available to employees or students.
 - d. 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.
2. Conduct a biennial review of their drug and alcohol prevention programs to:
 - a. Determine the effectiveness of its policies and implement changes to its program if they are needed.
 - b. Ensure that the sanctions developed are enforced consistently.

Grace College and Seminary acknowledges its obligation to conduct a biennial review of compliance with this federal mandate. This review was used to determine whether the institution fulfilled this regulation by summarizing the initiatives, programs, and policies related to alcohol and drug prevention and by completing the recommended [check list](#).

¹ These regulations were originally published in the Federal Register, Vol. 55, No. 159, Aug. 16, 1990, pp. 33580–33601, and are now available [here](#).

BIENNIAL REVIEW PROCESS

In compliance with the Drug-Free Schools and Communities Act of 1989, a review committee conducted a federally mandated biennial review of Grace Schools' alcohol and other drug (AOD) prevention program for calendar years 2017 and 2018. Its prior biennial report was for the academic years 2015-2016 to 2016-2017. Committee members were:

- Mr. Norm Bakhit, Chief Human Resources Officer
- Mrs. Emily Brenneman, Director of Residence Life
- Mr. Chad Briscoe, Athletic Director
- Mr. Aaron Crabtree, Dean of Students
- Mr. Glenn Goldsmith, Director of Campus Safety
- Dr. Deb Musser, Director, Health and Counseling Center
- Dr. Carrie Yocum, Vice President of Administration and Compliance

The Higher Education Center's *Compliance Checklist* and *Supplemental Checklist* were used to audit and review Grace's programs.

The review committee, in consultation with other campus staff, assessed Grace's AOD-related initiatives, programs, and policies to determine whether any improvements were needed. This assessment considered all campus and community efforts that may serve to reduce employee and student alcohol and other drug use, even if they were not designed primarily for drug prevention purposes.

This biennial review is available to students, employees, and the public via the institution's [web site](#). It is retained in the school's administration and compliance office and by law is retained for three years after the fiscal year in which it was created. Additionally, the review committee validated Grace's enforcement procedures by evaluating institutional efforts to determine, prevent, and address violations of the institution's policies.

Those interested in more information about Grace's response to the use of alcohol, drugs, or other substances among students and employees may contact:

- Mr. Norm Bakhit, Chief Human Resources Officer (employee conduct), (574) 372- 5100 x6074
- Mrs. Emily Brenneman, Director of Residence Life (student conduct), (574) 372-5100 x6473
- Mr. Aaron Crabtree, Associate VP and Dean of Student Affairs, (574) 372-5100 x6464
- Mr. Glenn Goldsmith, Director, Campus Safety, (574) 269-5344 or (574) 372-5100 x6483

ANNUAL POLICY NOTIFICATION PROCESS

Student Policy

The primary ways in which the *Alcohol, Tobacco, and Substance Use and Abuse Student Policy* ([Appendix B](#)) is distributed are:

1. Via the campus [website](#) as part of the institution's consumer disclosures, thus making it accessible at all times to current and prospective students regardless of the number of courses or delivery format in which they are enrolled, and
2. As part of the undergraduate *Student Handbook* available to all enrolled students via the portal. The handbook is reviewed and updated annually to reflect current practices and changes in higher education regulations.

Students are informed in new student orientation about how to access the policy via the *Student Handbook*. All residential students are informed about the policy during the first mandatory hall meeting. The policy is also reiterated before each campus break (i.e., fall, winter, spring) through hall meetings.

The *Student Handbook* also contains information to students regarding community lifestyle expectations, drug law violations, liquor law violations, substance abuse, and substance use as part of the [normative](#) environment created on campus.

Athletics Addendum

In addition to the general student policy described in the *Student Handbook*, the athletic department has adopted additional policies specific to student athletes. Coaches provide this [addendum](#) to their teams via email and/or as a hard copy in team meetings. Additionally, the athletic director reviews the policy in annual athletic department meetings. The policy is available electronically on the [Student Right to Know page](#) of the institution's web site and hard copies are available in the athletic department office.

Employee Policy

Similar to its distribution of the student policy, Grace makes its *Drug and Alcohol Abuse Employee Policy* available on the consumer disclosures page of its [website](#). Doing so ensures that any prospective or current employee, faculty or staff member can access the information whenever needed.

Additionally, annual online training for regular employees through SafeColleges requires that employees review the *Employee Handbook*, which includes this policy as well as other workplace safety and well-being information such as tobacco-free workplace; employee use of

alcohol, drugs, and tobacco off-campus; employees' duty to report arrests and convictions; and investigation and searches. The employee policy is included in this report as [Appendix D](#).

AOD PREVALENCE RATE, INCIDENCE RATE, NEEDS ASSESSMENT AND TREND DATA

The following statistics, provided in compliance with the Federal Crime Awareness and Campus Security Act of 1990 and amended in 1992, 1998, and 2013, are part of the overall safety and security program of Grace College and Seminary. This data reflects disclosure of certain incidents occurring on campus that are reported to campus safety officers and occurred in the calendar years preceding the year in which the *Annual Security Report* is disclosed.

The campus' *Annual Security Report*, due each year by October 1, is available in its entirety on the institution's *Student Right to Know* page of the [website](#).

GRACE COLLEGE AND SEMINARY ALCOHOL AND DRUG-RELATED OFFENSES						
OFFENSE	YEAR	GEOGRAPHIC LOCATION – Winona Lake				
		On-campus Property	On-Campus Student Housing	Non-campus Property	Public Property	TOTAL
Liquor Law Violation/Arrests	2018	0	4	1	0	5
	2017	0	0	0	0	0
	2016	1	1	0	0	2
Drug Law Violation/Arrests	2018	0	0	0	0	0
	2017	2	1	0	1	4
	2016	6	0	0	0	6
Liquor Law Disciplinary Referrals	2018	0	1	0	0	1
	2017	0	5	0	0	5
	2016	3	0	0	0	3
Drug Law Disciplinary Referrals	2018	0	0	0	0	0
	2017	4	0	0	0	4
	2016	0	0	0	0	0

Student conduct violations noted above also include any student athlete violations. No student athlete was dismissed from a team during this review period under the athletic department's addendum to the institution's general alcohol, tobacco, and substance abuse policy.

There were no drug or liquor law violations or referrals for the Indianapolis location in 2016 or 2017. The program in Indianapolis ceased operating in 2018.

There were no drug or liquor law violations or referrals for the Bath, Ohio location in 2017 or 2018. The program was not active prior to 2017.

Student Conduct Sanctions Summary

Per the student affairs conduct office, the following were the number of sanctions for alcohol and drug violations.

GRACE COLLEGE AND SEMINARY ALCOHOL AND DRUG-RELATED SANCTIONS FOR THE WINONA LAKE CAMPUS		
Year	Short-term (1-5 day) suspension	Long-term suspension/Dismissal
2019*	2	0
2018	9	3
2017	27	4
2016	12	0
2015	22	5

*Note: As of 8/21/19

In addition to these sanctions, the conduct office always requires that students undergo a substance or alcohol use assessment and education through Grace’s on-campus counseling center. Students are given a choice to complete substance education through groups offered in Grace’s counseling center or via a third-party vendor that provides online education. Recommendations for additional services may be given based upon students’ level of dependency/addiction to a substance.

Records are maintained on each conduct violation and students with repeat violations undergo additional sanctions up to dismissal from the college. The conduct office evaluates annually all violations to determine trends and any changes needed to policies, sanctions, enforcement, education, or other programming.

The *Student Handbook* describes accountability for the adherence to Grace’s lifestyle expectations (including use of alcohol by students of legal age) when representing or working for Grace as well as while on missions or other international trips.

Additionally, in recognizing the authority and guidance of parents and the local church regarding students’ adherence to its community lifestyle expectations while they are on

Christmas and summer breaks, the institution has some modified expectations about students' use of alcohol during these extended breaks. The student conduct office provided the following historical data, indicating no significant or sustained increase in alcohol violations over the past several years given increases in the institution's enrollment on the Winona Lake campus as well as its modification of expectations regarding legal use of alcohol. There have, however, been some spikes in drug use violations.

All violations are monitored by the student affairs and conduct offices to determine patterns and trends where possible.

GRACE COLLEGE AND SEMINARY												
ALCOHOL AND DRUG INCIDENTS ON THE WINONA LAKE CAMPUS												
Year	07	08	09	10	11	12	13	14	15	16	17	18
Alcohol	32	16	5	27	14	20	16	41	28	26	44	24
Drugs	2	6	0	0	6	10	5	22	9	13	23	13

AOD POLICY, ENFORCEMENT & COMPLIANCE INVENTORY & RELATED OUTCOMES/DATA

The following policies are included as appendices in this Biennial Review:

1. Alcohol, Tobacco, and Substance Abuse and Use student policy ([Appendix B](#))
2. Athletic Department addendum ([Appendix C](#))
3. Alcohol and Drug Abuse employee policy ([Appendix D](#))
4. Community Lifestyle Expectations (for students as an example) ([Appendix E](#))

The student alcohol and substance abuse policy is monitored and updated annually by student affairs staff. It is administered by student affairs in consultation with the academic office, faculty, campus safety, or others as needed depending on the individual student circumstances.

The athletic department addendum policy is monitored and updated annually by the athletic director in consultation with coaches. It is administered by the athletic department and student affairs staff.

The employee alcohol and drug abuse policy is monitored and updated annually by the chief human resources officer. It is administered by the human resources department and the hiring supervisor.

The institution also has an extensive policy on sexual misconduct and sexual harassment, which includes references to alcohol and drug use as related to sexual assault. This policy is available on the institution's *Student Right to Know* page of its [website](#). This policy is reviewed and updated at least annually by the Title IX Coordinator in consultation with the Title IX Case Team. In part, it includes a section on amnesty as part of the sexual harassment reporting process, but clarification that amnesty due to alcohol or drug use is not provided to the responding party when a finding of responsibility is determined. Although amnesty does not include discipline for a reporting party, it may include an educational intervention to provide support.

Resident assistants (student employees) and resident directors (regular staff) are trained annually about the institution's policies and their reporting and monitoring responsibilities regarding conduct and criminal activity.

In addition to training that is role-specific, all employees complete online training related to alcohol and drug abuse via the institution's provider, SafeColleges.

Certain employees at Grace are designated as Campus Security Authorities (CSAs) with responsibility to report any knowledge of crimes to the campus safety department. Both students and employees designated as CSAs receive training regarding their role and expectations to report, including those that may be alcohol or drug-related offenses.

The institution has articulated its expectations for students, faculty, staff, and board members as they live, work, learn, and worship in this community environment. These expectations include those related to personal habits and social practices. These expectations are operationalized in handbook policies specific to each group: employees, faculty, students, and board members. Handbooks are reviewed and updated, typically annually, by the respective staff and administrators in each of those areas. The student version of the *Statement on Community Lifestyle Expectations* is provided as [Appendix E](#) as an example of the others.

AOD PROGRAM ELEMENTS

Consistent with the definition from the Center for College Health and Safety (CCHS), Grace views a "normative environment" as one in which drinking and other drug use is not considered a "normal" part of the college experience at Grace. Alcohol and other drug use is not viewed as an acceptable part of the Grace campus environment, and Grace recognizes the high-risk behavior associated with substance use increases. Creating a definition of "normal" and, therefore, reducing this level of acceptance on the Grace campus is instrumental for its successful alcohol and drug prevention effort.

Social norms are people’s beliefs about the attitudes and behaviors that are acceptable, or even expected, in a particular social context. Because people’s perception of these norms will greatly influence their behavior, the normative environment at Grace seeks to encompass all of the factors that help to establish these norms among its students and employees (CCHS).

As a Christian institution of higher education that applies biblical values in developing students and employees, Grace has articulated through its *Community Lifestyle Expectations* the guidelines for choosing God-honoring personal, social, and recreational practices that are consistent with the normative environment found in its Christian context.

Specifically, as such, Grace desires to focus on creating a spiritual, social, academic, and residential environment that supports healthy, respectful student behaviors and norms. Creating this environment requires consistent communication of expectations about alcohol and other drug-related behavior, while supporting and encouraging choices in conduct, personal, living, leisure, worship, and work habits that promote health, safety, and well-being.

Articulating expectations and promoting God-honoring behavior at Grace, therefore, begins with the admissions process and continues through graduation for students (CCHS).

The following illustrate some of the programs, processes, initiatives, activities, and commitments at Grace that promote and reinforce healthy norms and discourage high-risk behavior. These illustrations consist of campus efforts that may serve to deter and reduce student and employee alcohol and drug use even if they were not designed specifically for that purpose ([Campus Health and Safety](#) and Higher Education Center *Guide for University and College Administrators*).

Alcohol and Drug Free Events and Facilities

Grace upholds all federal, state, and local laws limiting or restricting alcohol and drug use on its premises. In addition, all events sponsored or promoted by Grace College and Seminary, regardless of whether they occur on-campus or off-campus or are legally permitted, are alcohol- and tobacco free; no announcement or advertisement about such events mentions or promotes alcohol, drug, or tobacco use. Examples of these Grace-sponsored events include:

1. Alumni events
2. Athletic events, tailgating, and concession stands
3. Board meetings
4. Building dedications
5. Commencement
6. Employee recognition, holiday, and social events
7. Employee retirement parties

8. Events held in Grace facilities
9. Lancer and other campus visit days
10. Welcome Weekend
11. Student career fairs
12. Student clubs, activities, and government
13. Staff and faculty retreats, inservices, and professional development days

All facilities at Grace are alcohol- and tobacco-free, including those rented by third-parties and those accessible to visitors. These spaces include indoor and outdoor gathering spaces, residence halls, dining facilities, campus book store, and academic support, athletic, recreation, and library spaces.

Two exceptions are the occasional events hosted by private citizens, typically in their own homes, in support of the Lilly Center for Lakes and Streams, and events taking place in a facility leased by Grace to a local development group that hosts weddings and other events in which alcohol may be served.

Direct Program Interventions

The following are examples of direct programming for students that supports Grace's alcohol- and tobacco-free campus.

1. Online training through SafeColleges/Students regarding alcohol awareness and Grace's substance abuse policy is assigned annually to all students via email invitations.
2. Student leadership training on various topics related to decision making, problem solving, judgment, and lifestyle.
3. Residence hall programming and education by RAs and RDs.
4. Referral to the counseling center for educational interventions related to student conduct and Title IX referrals involving alcohol and/or drugs. Individual education and counseling may also be provided.
5. Portal log-in, beginning with deposited students, for access to the *Student Handbook* and AOD policies contained therein.
6. [Website](#) publication of the student, employee, and athlete AOD policies.
7. Mandatory, annual drug-free workplace online training for employees.
8. Training for residence life staff in drug recognition by the Winona Lake Police Department officers.

Normative Environment

1. Community lifestyle and milieu experiences

The Grace campus is an alcohol-free environment and has created a social, academic, and residential environment that supports healthy norms.

- a. Chapel is required for all students three days per week. Chapel topics may relate to holiness, sanctification, and spiritual disciplines. Speakers may share their personal experiences with alcohol and/or drug abuse or their expertise on the topic.
- b. Ministry and support groups for men and women, which include strategies to deal with personal struggles such as alcohol or substance use.
- c. Growth groups, an important part of the spiritual life of each student that provides an atmosphere of relationship, encouragement, accountability, and love both corporately and individually, are required of all freshmen in residence halls.
- d. Educational bulletin boards created by many RAs regarding alcohol and drug use and its affects on college students.
- e. Residence hall orientation, education, programming, and announcements related to policies, expectations, and campus resources.
- f. New student orientation and education related to transitioning to college-life and personal and campus safety.
- g. The expectation that personalization of rooms and clothing be in harmony with the spiritual philosophy of Grace; therefore, tobacco, drug, or alcoholic beverages should not be displayed or promoted in the residence halls and on campus.
- h. The expectation that all students and employees be active members of a local church.
- i. Campus employee prayer time.
- j. The regular habit of prayer at the beginning and/or closing of campus committees or employee, faculty, or department meetings.
- k. Community lifestyle expectations included as part of the *Spiritual Life Reference* form for employee applicants.
- l. Annual sign-off on the *Community Lifestyle Expectations* for regular employees and board members, and for part-time instructors at the time they are contracted.
- m. Grace's membership in athletic associations in which peer institutions share a similar identity and community lifestyle expectations and, therefore, similar alcohol- and drug-free campuses.
- n. Volunteer and community service is valued and promoted through student affairs.
- o. Events and activities for students and employees are alcohol-free.

2. Pro-health messages

- a. An on-campus [health and wellness center](#) with a full range of services to promote wellness, physical fitness, and physical activity for students, employees, alumni, and some community members.

- b. Free, on-campus personal and mental health counseling for traditional undergraduate students. Services are available to graduate students for a minimal fee.
 - c. *Lancer Living* newsletter for the campus featuring health, mental health, and alcohol and substance abuse notes.
 - d. Advertisement of [wellness initiatives](#) in the employee newsletter, *GracEquip*.
 - e. Annual biometric screenings for employees and spouses sponsored by human resources.
 - f. [Wellness programs and initiatives](#) for employees sponsored by human resources and the health and wellness center staff.
 - g. [Initiatives](#) that support “work/life balance” and have been incorporated into the institution’s strategic plan. A work/life balance survey was conducted in the last year.
 - h. Implementation of an improved and more comprehensive Employee Assistance Program (EAP) with Bowen Center, a local community mental health center.
3. *Admissions processes*
- a. Admissions counselors and student ambassadors are trained regarding Grace’s Christ-centered culture, campus safety, and employee adherence to the community lifestyle expectations so that interactions with prospective students and families consistently communicate support of an alcohol- and drug-free campus.
 - b. Promotional materials, admissions counselors, and admissions ambassadors articulate expectations regarding alcohol and other drug use.
 - c. Mentoring with faculty during individualized and group campus tours and continuing once students matriculate.
 - d. Coaches and admission counselors focus on attracting responsible students by focusing on Grace’s mission.
 - e. Admission applications include community lifestyle expectations.
 - f. View books focused on activities, athletics, and academics that emphasize the positive academic and social aspects of Grace.
 - g. The “Accepted Students” [page](#) on the website directs deposited students to student health information.
 - h. The “[PreUnion](#)” lake-day event for incoming students promotes strong campus connections in a supportive and encouraging environment.
 - i. The Presidential Scholarship Competition attracts approximately 150 highly-motivated, academically strong student leaders each year.

4. *Academics*

- a. A high level of student advising, mentoring, and engagement by faculty.
- b. *First-Year Foundations* in which personal growth, healthy living, academic success, and community involvement are emphasized.
- c. *Addictive Behavior* and *Substance Abuse and Use* courses in addition to others in the criminal justice program educate many students in one of the largest academic departments.

5. *Student activities*

- a. Student ministry and service opportunities promote strong community connections, empathy, and participation in alcohol, drug, and tobacco-free activities.
- b. Grace-sponsored activities promote healthy norms and discourage alcohol or drug use.

Athletics Direct Program Interventions

1. The athletic department has an athlete-specific [policy](#) about alcohol, tobacco, and substance use violations that is in addition to the general student policy.
2. Annual meetings for athletes, one for new/incoming athletes and a second for all athletes, in which the athletic department policy is reviewed and character and decision-making are emphasized.
3. Participation by the dean of students and chaplain in the annual athletics meetings, focusing on student development, the desired campus culture at Grace, their role as student leaders with a responsibility to model pro-social behavior, the higher level of responsibility athletes have, and the availability of student affairs if athletes choose to seek help with their struggles, a bad habit, or an addiction.
4. NAIA mandated random drug testing for teams attending the national conference. In addition, Grace's athletic department has mandated that all athletes take the NAIA-Drug Education online course (*NAIA Rules and Performance Enhancing Drug Awareness Introduction-Performance Enhancing Drugs*) before any regular season play.

Policy Development and Enforcement

1. The undergraduate *Student Handbook* includes "Crime Definitions," such as alcohol, drug abuse, and liquor law violations. The handbook, which is updated annually, is available to all current students via the campus portal.
2. The institution's *Statement on Community Lifestyle Expectations*, which addresses faith and conduct, is published in the *Student Handbook* as are expectations about students' community responsibilities, attitude, and conduct.
3. In 2018, the student drug policy was changed to permit use of CBD oil as regulated by the State of Indiana regarding the sale of CBD oil.

4. The college implemented policies on medical amnesty and on overdose prevention that provide guidance to those assisting others in alcohol- or drug-related medical emergencies.
5. The student affairs conduct office consistently uses its published sanctions for alcohol and drug violations of campus policy.
6. The *Employee Handbook* contains policies about Grace as an alcohol, drug, and tobacco-free environment. Policies are enforced by human resources and the hiring manager.
7. The institution's sexual misconduct policy and Title IX training for employees, students, and vendors promotes safety and well-being, reporting procedures, and discussions about the relationship between substance use and sexual misconduct.
8. In 2018, campus safety personnel increased its training for campus security authorities regarding reporting crimes (including those substance related).
9. In 2019, the campus post office implemented a policy regarding the receipt or identification of suspicious packages, which can include the mailing of contraband or prohibited substances to students on campus.
10. The institution disseminates its safety and risk statistics and information to employees and students and makes it publicly available on its website in compliance with the Clery Act. The [Student Right to Know page](#) of its website contains health and safety information including policies, the *Annual Security and Fire Report*, and this biennial report, all of which publish data regarding alcohol and substance use.

2017 Campus Climate Survey

Grace conducted a campus climate survey in January 2017 as part of a research project evaluating the prevalence of and responses to campus sexual violence. Because one of the consistent variables associated with sexual violence perpetration is alcohol use, the climate survey included questions associated with drinking behavior. Specifically, students were asked to report the frequency of specific drinking behaviors since they had been enrolled at Grace. The survey was sent to 1250 undergraduate students and had a 31.1% response rate ($n = 389$), with 16.2% ($n = 202$) completing the survey (i.e., answering at least 75% of the survey questions).

The benchmark group included 54 total institutions: 13 public institutions, 19 private (non-faith) institutions, and 22 CCCU (faith-based) institutions (benchmark institutions). Grace had approximately the same percent males as the benchmarks and national norms; percent female was less and those identifying as "White" were greater.

In all responses – frequency of behavior as well as reports of binge drinking, maximum drinks in a 24-hour period, and underage drinking – Grace students reported well below the benchmark

group and national norms from the overall sample. The amount of use reported by students who completed the survey was, however, higher than expected by student affairs staff given the culture, context, and lifestyle expectations of the Grace community.

Grace is planning to conduct a climate survey every three years, with its next scheduled for Winter 2020.

Collaboration with Law Enforcement

In 2018, Grace College formalized what had previously been an informal agreement with the Winona Lake Police Department (WLPD) regarding their collaborative, ongoing, and cooperative public safety efforts. The *Memorandum of Understand* (MOU) set forth the roles and responsibilities of both the college and the WLPD to enhance the safety of employees, students, and visitors of the college; ensure that investigations are comprehensive; aid in student disciplinary proceeding; facilitate prosecution of offenders; and respect the legal rights and provide the appropriate support to all involved in any investigation.

As part of its MOU with the WLPD, annual drug recognition training is provided to college residence life staff by the WLPD.

AOD STRENGTHS AND WEAKNESSES

The following strengths, weaknesses, and opportunities were identified in the 2015-2017 biennial report.

Strengths of Policies and Programs

1. Promotional materials, admissions counselors, and admissions ambassadors articulate expectations regarding alcohol and other drug use with images and descriptions of social norms that may dispel student myths about peer drinking.
2. Admission applications and view books focus on activities, athletics, and academics, which encourage strong campus connections and emphasize the positive academic and social aspect of Grace.
3. Faculty are typically a reason that students select Grace. Relationships on campus are broadly viewed as being authentic and students appreciate the opportunity to meet with faculty during campus tours.
4. Smaller class sizes and faculty/student ratios promote engagement and contact.
5. Residence hall and campus milieus support good decision making and responsible, God-honoring relationships and behaviors.

6. The campus' 2017 climate survey reports drinking behavior that is less than benchmark and national schools by undergraduate students.
7. Student affairs firmly and consistently enforces violations of the institution's AOD and community lifestyle violations.
8. Because the college uses online training, SafeColleges, it can, therefore, implement mandatory training at any time when onboarding a new employee, thus increasing the convenience and likelihood that the employee will complete the training in a timely way.

Weaknesses of Policies and Programs

1. In review of the communication of the AOD policies, it was noted that the versions that are communicated are inconsistent. The policy in the *Student Handbook* includes detailed sanctions per 1st, 2nd, and 3rd offenses, but the policy on the *Student Right to Know* page does not.
2. Although the student affairs system for responding to violations is strong, and seeks to balance the punitive and the developmental consequences in the best interest of the student and the college community, there are areas for growth. Primarily, to see more proactive efforts at engaging the college community regarding its expectations and offer support for students who are dealing with addiction.
3. There is no standard training for students regarding alcohol and drug prevention other than in hall meetings.

Opportunities for Policies and Programs

1. The institution's online training from its provider, SafeColleges, is available to all students; therefore, modules on alcohol awareness for college students, the institution's alcohol policy, drug awareness and abuse, and health and safety awareness can be added to either the first-year experience classes and/or monthly training requirements.
2. The policy can be added to the SafeColleges module as an attachment for employee sign-off.
3. Student affairs can evaluate the need for a *Medical Amnesty* policy.
4. Student affairs can evaluate the need for adopting the use of Naloxone kits.
5. The employee onboarding process can be standardized to consistently distribute mandatory compliance materials.
6. What is communicated at mandatory hall meetings could be clarified to more clearly articulate community standards and expectations regarding alcohol and drug use.
7. Voluntary, free group counseling for students who enter college with a history of using or abusing substances could be offered.

8. The master list of student conduct violations could include an additional field to denote student athletes by sport for improved tracking.
9. The athletic department's addendum to the alcohol prevention policy can be added to the institution's consumer information page to be available to all current and prospective student athletes at all times.
10. The institution's implementation of an online, anonymous notification form that can include suggestions, concerns, or complaints as related to alcohol or drug policies, sanctions, and enforcement should be finalized.

RESPONSES TO WEAKNESSES AND OPPORTUNITIES

In the two years since the institution's last biennial review, it has responded in the following ways.

1. The correction was made to assure that the AOD policies in the *Student Handbook* and on the Student Right to Know page of the web site are the same, assuring consistent communication of the policies. (Weakness #1)
2. Residence life staff offers campus programming every year for men (No Man Walks Alone) and women (Stand Up for Your Sister) to address a variety of topics including addiction. Students are made aware of the support that Grace College can provide through the counseling center. In addition, yearly, in upperclassmen/apartment style housing, there is programming offered on the topic of alcohol and what it is to "drink responsibly" in order to equip students of legal drinking age to understand the effects of alcohol on their bodies. (Opportunity #2 and #6)
3. Student affairs and the administration and compliance offices worked together to write overdose prevention, medical amnesty, and Indiana Lifeline policies to address the use of Nalaxon and the situations in which students may have amnesty for their responsible reporting of someone needing emergency assistance for alcohol use. These were approved by the senior administration. (Opportunity #3 and #4)
4. With turnover in several key positions in human resources over the past two years, this opportunity to improve the on-boarding process remains in progress. (Opportunity #5)
5. The counseling center began offering substance use classes in spring 2017. These classes, 4 weeks long and offered 1-2 times per semester are open to any student. Current students who are in counseling and have addictions issues will be educated about these groups as an option and students referred by student affairs for a substance assessment and education are given the option of online education through 3rd Millennium or to do the on-campus substance group option. Groups are largely

psychoeducational (vs. process) and led by a clinician (non- licensed therapists are supervised by a licensed individual). (Weakness #2, Weakness #3, and Opportunity #7)
Hall meetings at the beginning of the year (hall orientation) is the primary outlet for our staff to disseminate information about Grace's policy on Alcohol. At this time, we don't have anything else established.

6. The master list of student conduct violations now includes an additional field to denote student athletes by sport for improved tracking. (Opportunity #8)
7. The athletic department's addendum to the general student alcohol and drug use policy was added to the [student right to know](#) page of the institution's website. Doing so provides additional information for student athletes. (Opportunity #9)
8. The online complaint form was finalized and is available on the institution's [student right to know](#) page of the institution's website. (Opportunity #10)

GOALS FOR 2019 AND 2020

1. GOAL #1: Work with the prosecuting attorney to determine the criminal justice system response to any detection of illegal substances through a canine search.

The college had a plan in 2018 to do a canine search of residence halls and administrative building during Christmas break to learn about how the search process worked. Although we had an understanding with the Winona Lake Police Chief that the purpose of the search was for training and education purposes only, concerns arose regarding how any detection by the dog would result in a search warrant. The campus was notified in advance of the intended search date of this concern. The search was not carried out until the logistics of the search warrant could be clarified with the prosecuting attorney.

2. GOAL #2: Expand the on-boarding process for new employees to include implementation of education about the employee substance abuse policy.

There have been significant transitions in the human resources office in the past 2-3 years, including staff turnover and vacancy in the director position. With all positions currently filled, the human resources office will re-evaluate its on-boarding process to assure that the necessary information about Grace as a drug- and alcohol-free campus and other safety practices are presented to prospective and new employees in a consistent way.

3. GOAL #3: Establish a procedure with KCH and Grace's Health Center to do drug testing for students as part of Grace's student conduct process or as an accountability measure following the conduct process to include in the 2020-2021 *Student Handbook*.
4. GOAL #4: The Grace Health & Counseling Center will provide at least one educational outreach event for students specific to the impact of substance use on physical and/or emotional health.
5. GOAL #5: The Grace Health & Counseling Center will identify internal and external resources to provide expertise and/or direct educational programming for students regarding the impact of substance use.

CONCLUSION

Grace College and Seminary takes seriously its responsibility to provide a safe living and work environment for its student and employees and desires to provide programs, experiences, guidance, and supportive services to promote God-honoring relationships, personal habits, and conduct.

Those interested in learning more about this report, the institution's program or intervention-related materials, or supporting data and references are encouraged to contact one of the review committee members.

Appendix A: Legislation

Public Law 101-226: The Drug Free Schools and Communities Act Amendment of 1989

Section 22. DRUG FREE SCHOOLS AND CAMPUSES

(a) IN GENERAL. –

(1) CERTIFICATION OF DRUG AND ALCOHOL ABUSE PREVENTION

PROGRAM. – Title XII of the Higher Education Act of 1965 (20 U.S.C. 1001 et seq.) is amended by adding at the end a new section 1213 to read as follows:

“DRUG AND ALCOHOL ABUSE PREVENTION”

“SEC. 1213. (a) Notwithstanding any other provision of law, no institution of higher education shall be eligible to receive funds or any other form of financial assistance under any Federal program, including participation in any federally funded or guaranteed student loan program, unless it certifies to the Secretary that it has adopted and has implemented a program to prevent the use of illicit drugs and the abuse of alcohol by students and employees that, at a minimum, includes –

“(1) the annual distribution to each student and employee of –

“(A) standards of conduct that clearly prohibit, at a minimum, the unlawful possession, use, or distribution of illicit drugs and alcohol by students and employees on its property or as part of any of its activities;

“(B) a description of the applicable legal sanctions under local, State, or Federal law for the unlawful possession or distribution of illicit drugs and alcohol;

“(C) a description of the health risks associated with the use of illicit drugs and the abuse of alcohol;

“(D) a description of any drug or alcohol counseling, treatment, or rehabilitation or reentry programs that are available to employees or students; and

“(E) a clear statement that the institution will impose sanction on students and employees (consistent with local, State, and Federal law), 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 required by paragraph (1)(A); and

“(2) a biennial review by the institution of its program to –

“(A) determine its effectiveness and implement changes to the program if they are needed; and

“(B) ensure that the sanctions required by paragraph (1) (E) are consistently enforced.

H.R. 3614 – 12

(b) Each institution of higher education that provides the certification required by subsection (a) shall, upon request, make available to the Secretary and to the public a copy of each item required by subsection (a)(1) as well as the results of the biennial review required by subsection (a)(2).

“(c) (1) The Secretary shall publish regulations to implement and enforce the provisions of this section, including regulations that provide for –

“(A) the periodic review of a representative sample of programs required by subsection (a); and

“(B) a range of responses and sanctions for institutions of higher education that fail to implement their programs or to consistently enforce their sanctions, including information and

technical assistance, the development of a compliance agreement, and the termination of any form of Federal financial assistance.

“(2) The sanctions required by subsection (a) (1) (E) may include the completion of an appropriate rehabilitation program.

“(d) Upon determination by the Secretary to terminate financial assistance to any institution of higher education under this section, the institution may file an appeal with an administrative law judge before the expiration of the 30-day period beginning on the date such institution is notified of the decision to terminate financial assistance under this section. Such judge shall hold a hearing with respect to such termination of assistance before the expiration of the 45-day period beginning on the date that such appeal is filed. Such judge may extend such 45-day period upon a motion by the institution concerned. The decision of the judge with respect to such termination shall be considered to be a final agency action.”

(2) EFFECTIVE DATE. – (A) Except as provided in subparagraph (B), the amendment made by paragraph (1) shall take effect on October 1, 1990.

(B) The Secretary of Education may allow any institution of higher education until not later than April 1, 1991 to comply with section 1213 of the Higher Education Act of 1965

(as added by paragraph (1)) if such institution demonstrates –

(i) that is in the process of developing and implementing its plan under such section; and (ii) it has a legitimate need for more time to develop and implement such plan.

Appendix B: Student Policy

GRACE COLLEGE AND SEMINARY
Alcohol, Tobacco, and Substance Use and Abuse
Student Policy
8/1/17

Policy: The use, sale, purchase, transfer, or possession of a controlled substance on property owned or leased by Grace College or while participating in activities sponsored by the College, and the use, possession, or being under the influence of alcohol, and the abuse of prescription medicine also pose unacceptable risks for safe, healthy and efficient operations. Violation of the College's policy will be subject to the student conduct process up to and including dismissal.

In addition, the College recognizes that tobacco is a harmful substance, even if lawful, and has a policy of prohibiting the use of tobacco. This includes (but is not limited to) cigarettes, cigars, pipes, hookah, chewing or dipping, electronic devices (e-cigarettes or cigars) and other means of inhalation. Tobacco cessation assistance is available through the Grace College Health and Counseling Center.

Vaporizer use, regardless of substance being inhaled, is prohibited for Grace College students.

Grace further expresses its intent to comply with federal and state rules, regulations or laws that relate to the maintenance of a school free from controlled substances and unlawful and irresponsible use of alcohol.

Purpose: Grace has the right and obligation to maintain a safe, healthy, and efficient environment for all of its students, and to protect the College's property, information, equipment, operations and reputation.

Scope: Grace College has a vital interest in maintaining a safe, healthy, and efficient environment. Being under the influence of a controlled substance or alcohol while a student poses serious safety and health risks to the user and to all those who associate with the user. This policy, therefore, applies to all students in all programs and all off campus locations.

Standards of Conduct:

1. Members of the community are to refrain from the use of tobacco in any form, alcoholic beverages, and controlled substances.
2. Controlled substances are defined as:
 - a. Any drug or other substance that is not legally obtainable
 - b. Any drug that is legally obtainable but has not been legally obtained

- c. Any prescribed drug not legally obtained
 - d. Any prescribed drug not being used for the prescribed purpose
 - e. Any over-the-counter drug being used at a dosage level other than recommended by the manufacture or being used for a purpose other than intended by the manufacturer
 - f. Any drug being used for a purpose not in accordance with bona fide medical therapy.
 - g. Unregulated high-tech smoking devices, commonly referred to as electronic cigarettes, or “e-cigarettes,” or “vaporizers”.
3. Examples of controlled substances are cannabis substances, such as marijuana and hashish, cocaine, heroin, methamphetamine, phencyclidine (PCP), and so-called designer drugs and look-alike drugs.
 4. Grace College students may not be bartenders (students may serve alcohol in restaurants, but not bartend), be involved in the purchase of alcohol for a minor, or provide an off-campus location for a party where alcohol or controlled substances are available.

Student Conduct Sanctions:

Sanctions action against students related to the violation of the expressed standards of conduct will be in accordance with those outlined in the Student Conduct Guidelines. In each situation there are several variables which may contribute to the resulting decisions. Grace College reserves the right to exercise greater or less severity in decisions. Examples of variables that would likely result in greater severity (and likely suspension or dismissal) include: providing for minors, lying, operating a vehicle while under the influence, distribution or selling controlled substances, drinking or drunkenness on campus, and hosting an off campus party. The values of community, integrity, truth, and response to correction are held in higher regard than “fairness” to other situations. The following sanctions are intended to be general guidelines toward forming a response.

Alcohol

Students who violate the campus alcohol policy will generally be assessed a student conduct contract with the following sanctions:

1. First Offense consumption, possession, or purchase
 - a. The student will undergo an alcohol assessment administered by the Grace College Counseling Center. All recommendations from the assessment must be completed.
 - b. The student will complete an online alcohol education class (Student will pay \$35.00 cost).
 - c. The student will meet with a mentor approved by Student Affairs a minimum of 8 times.

- d. If the student is underage the student's parents will be informed.
 - e. If the student is in a leadership position or an athlete, they will incur additional sanctions.
 - f. All sanctions must be completed within one semester (16 weeks) of being issued a student conduct contract. Failure to comply with the contract will result in further sanctions up to and including a student conduct panel.
2. Second Offense consumption, possession, or purchase
- a. The student will serve a suspension away from campus with the accompanying grade reduction in each of their classes.
 - b. The student will undergo a second alcohol assessment administered by the Grace College Counseling Center. All recommendations from the assessment must be completed.
 - c. The student will meet with a mentor approved by Student Affairs a minimum of 15 times or attend counseling for one full semester.
 - d. The student's parents will be informed.
 - e. If the student is in a leadership position or an athlete, they will incur additional sanctions up to and including disciplinary probation.
 - f. All sanctions must be completed within one semester (16 weeks) of being issued a student conduct
 - g. contract. Failure to comply with the contract will result in a student conduct panel.
3. Third Offense consumption, possession, or purchase
- a. The student will appear before a student conduct panel. The panel will determine sanctions up to and including dismissal. The student will likely be suspended until the panel can be convened.
 - b. The student's parents will be informed.
 - c. If the student is in a leadership position that student's employment will be terminated.
 - d. If the student is an athlete, they will be removed from their athletic team.

Illegal Drugs

Students who violate the campus substance use policy will generally be assessed a student conduct contract with the following sanctions:

- 1. First Offense consumption, possession, or purchase
 - a. The student will serve a suspension away from campus with the accompanying grade reduction in each of their classes.
 - b. The student will undergo a substance use assessment administered by the Grace College Counseling Center. All recommendations from the assessment must be completed.

- c. The student will complete an online substance use education class (Student will pay \$35.00 cost).
 - d. The student will meet with a mentor approved by Student Affairs a minimum of 15 times or attend counseling for one full semester.
 - e. The student's parents will be informed.
 - f. If the student is in a leadership position or an athlete, they will incur additional sanctions up to and including disciplinary probation.
 - g. All sanctions must be completed within one semester (16 weeks) of being issued a student conduct contract. Failure to comply with the contract will result in further sanctions up to and including a student conduct panel.
 - h. Depending on the seriousness of the offense, appropriate law enforcement may be notified.
2. Second Offense consumption, possession, or purchase
- a. The student will appear before a student conduct panel. The panel will determine sanctions up to and including dismissal. The student will likely be suspended until the panel can be convened.
 - b. The student's parents will be informed.
 - c. If the student is in a leadership position that student's employment will be terminated.
 - d. If the student is an athlete, they will be removed from their athletic team.
 - e. Depending on the seriousness of the offense, appropriate law enforcement may be notified.

Legal Sanctions

In addition to the student conduct process from the College, local, state, and federal laws strictly outline penalties, including fines and jail terms, for the illegal use, possession or distribution of alcohol and drugs. A violation of any law is a violation of the student conduct policy and will be treated as a student conduct manner. Further Grace College will coordinate with local and federal law enforcement with any violation. Indiana and federal law provides for fines and/or imprisonment for the unlawful possession, sale, manufacture, or distribution of drugs or alcohol. The amount of the fines and the length of imprisonment vary according to the type and amount of the substance involved, prior violations for such offenses, and a variety of other factors. Legal sanctions for the unlawful distribution of drugs increase if the substance is distributed to a person under twenty-one years of age or within one thousand feet of the property of a college. A summarized list of Indiana State Sanctions is available from the office of Student Affairs.

Health and Other Risks

The abuse of alcohol and use of illicit drugs are known to be detrimental to physical and psychological well-being. Almost every system in the body can be negatively affected by excessive or chronic alcohol consumption or drug use. Their use is associated with a wide variety of health risks such as severe weight loss, anemia, physical and mental dependence, impaired learning, depression, high-risk sexual behavior, changes in the reproductive system, damage to the lungs, cardiovascular disease, cancer, liver disease, seizures, brain damage, acute and chronic illness, and even death. Because many who abuse alcohol and drugs also smoke, the health risks are further compounded.

In addition, the abuse of alcohol and drug use are associated with risks to the community and may include such things as impaired and unsafe work performance, violence, injuries, accidents, drunk driving, acquaintance rape.

Clinical Exams and Testing

College officials reserve the right to require that a student submit to a physical exam or clinical testing designed to detect the presence of drugs when there are reasonable grounds (meaning objective facts sufficient to lead a reasonable person to conclude that a particular student is unable to satisfactorily perform his or her duties or function in a college environment due to drug or alcohol impairment. Such inability to perform may include, but is not limited to, decreases in the quality or quantity of the student's productivity, judgment, reasoning, concentration and psychomotor control, and marked changes in behavior. Accidents, deviations from safe working practices, and erratic conduct indicative of impairment are examples of "reasonable belief" situations) for believing that a student is under the influence of, or improperly using controlled substances, prescription or over the counter drugs or alcohol in violation of this policy.

If action was based upon a drug or alcohol test, the student will have the right, at his or her expense, to have a separate test performed on the same sample by a testing agency acceptable to the College.

Counseling, Treatment, and Rehabilitation

Alcohol and drug information, referral, counseling, treatment, and rehabilitation programs are available to students through a variety of on- and off-campus resources. Counseling services are available on campus through the Counseling Center. For more serious problems, the Counseling Center may refer students to counseling, treatment, or rehabilitation programs off campus, and maintains a list of these resources available locally to students or others wanting information or counseling for alcohol or drug use. Some of these services and programs are without charge, while others are covered by the student's insurance or based

on the student's ability to pay. The Counseling Center will assist students who do not live locally to identify counseling or treatment services in their immediate vicinity.

Students with questions, concerns, or problems related to the use of illicit drugs or the abuse of alcohol are urged to take immediate advantage of the help that is available.

Revision History:

Date	Description of Revision
unknown	Creation and initial approval
8/1/16	Specified specific conduct sanctions and clarified parental notification, leadership and athletic sanctions. Clarified vaporizer usage as prohibited regardless of nicotine or tobacco content.

Appendix C: Athletic Department Policy

GRACE COLLEGE AND SEMINARY
Athletic Department Policy
Alcohol Addendum for Student Athletes

Student Athletes are under the authority and guidance of their head coaches during their time as an athlete at Grace College. Student athletes are held accountable to the entire student life covenant and in addition to as a student athlete they are held to a higher standard. Student athletes regardless of age during their time as a student athlete are not allowed to consume alcohol at any time. The athletic department supports the full development of all student athletes and believes that alcohol does not support the full development of an athlete, further it does not support the highest level of physical development & potential achievement for a student athlete. Student athletes traveling on team mission trips, or who are participating in Go Study or Go Exchange programs, are to be under the athletic department community lifestyle statement for the duration of the trip. Student athletes who are 21 or older and are a member of a Grace athletic program are encouraged to communicate with their head coach regarding any specific summer trip, job or individual experience that needs to be discussed regarding alcohol being present at an event.

The success of any operation requires teamwork and cooperation. Teamwork includes working by a common set of work rules and standards. You are expected to conduct yourself at all times in a manner that promotes the health and safety of all members of your athletic program. You should protect the integrity of the players, coaches and team at all times. This guideline is an example of our desire as an athletic department to build champions of character and assist achieving the highest level of athletic performance & growth while playing for Grace College. New guidelines may be established whenever necessary.

DISCIPLINE INFORMATION:

Student athletes who violate the tobacco, alcohol and substance use policy will be disciplined both by student life and the athletic department who work in conjunction together.

First Offense: 2 game suspension (based on the number of games scheduled for the season), mentorship by a coach, teammate, faculty, or member of the community agreed upon by the coach, athletic director and dean of students. The student will also fulfill additional expectations set forth by the coach and student life. A meeting with the coach, athletic director and student will take place and parents will be informed.

Second Offense: Half of the athletic season suspension (based on the number of games schedule for the season) and temporary dismissal from the team or practice is possible. The student will also

fulfill additional expectations set forth by the coach and student life. A meeting with the coach, athletic director and student will take place and parents will be informed.

Third Offense: Dismissal from the team for 1 year and potential dismissal from Grace College.

Revision History:

Date	Description of Revision
8/1/14	Creation and initial approval

**GRACE COLLEGE AND SEMINARY
Drug and Alcohol Abuse
Employee Policy
6/26/14**

Policy: The use, sale, purchase, transfer, or possession of an illegal drug in the workplace, and the use, possession, or being under the influence of alcohol, therefore, poses unacceptable risks for safe, healthy and efficient operations. As a condition of employment, all employees are required to abide by the terms of this policy and to notify Grace’s management of any criminal drug statute conviction for a violation occurring in the workplace no later than five days after such conviction.

In addition, the College recognizes that tobacco is a harmful substance, even if lawful, and has a policy of discouraging the use of tobacco.

Grace further expresses its intent through this policy to comply with federal and state rules, regulations or laws that relate to the maintenance of a workplace free from illegal drugs and alcohol.

1. Purpose

Grace has the right and obligation to maintain a safe, healthy, and efficient workplace for all of its employees, and to protect the organization’s property, information, equipment, operations and reputation.

This policy outlines the goals and objectives of Grace’s drug and alcohol testing program and provides guidance to supervisors and employees concerning their responsibilities for carrying out the program.

2. Scope

This policy applies to all departments, all employees, and all job applicants. The term “employee” includes contracted employees.

3. Health and Other Risks

Grace College & Seminary has a vital interest in maintaining a safe, healthy, and efficient working environment. Being under the influence of a drug or alcohol on the job also poses serious safety and health risks to the user and to all those who work with the user.

The abuse of alcohol and use of illicit drugs are known to be detrimental to physical and psychological well-being. Almost every system in the body can be negatively affected by excessive or chronic alcohol consumption or drug use. Their use is associated with a wide variety

of health risks such as severe weight loss, anemia, physical and mental dependence, impaired learning, depression, high-risk sexual behavior, changes in the reproductive system, damage to the lungs, cardiovascular disease, cancer, liver disease, seizures, brain damage, acute and chronic illness, and even death. Because many who abuse alcohol and drugs also smoke, the health risks are further compounded.

In addition, the abuse of alcohol and drug use are associated with risks to the community and may include such things as impaired and unsafe work performance, violence, injuries, accidents, drunk driving, and acquaintance rape.

4. Definitions

- 4.1 **Alcohol** means any beverage that contains ethyl alcohol (ethanol), including but not limited to beer, wine, and distilled spirits.
- 4.2 **Company premises or company facilities** means all property of Grace including, but not limited to, the offices, facilities and surrounding areas on Grace-owned or –leased property, parking lots, and storage areas. The term also includes Grace-owned or –leased vehicles and equipment wherever located.
- 4.3 **Drug Paraphernalia** means any equipment, product, or material of any kind that is primarily intended or designed for use in manufacturing, compounding, converting, concealing, producing, processing, preparing, injecting, ingesting, inhaling, or otherwise introducing into the human body a controlled substance, possession of which is unlawful under this subchapter. It includes items primarily intended or designed for use in ingesting, inhaling, or otherwise introducing marijuana, cocaine, hashish, hashish oil, PCP, methamphetamine, or amphetamines into the human body.
- 4.4 **Drug testing** means the scientific analysis of urine, blood, breath, saliva, hair, tissue, and other specimens of the human body for the purpose of detecting a drug or alcohol.
- 4.5 **Illegal drug** means:
- a. any drug that is not legally obtainable
 - b. any drug that is legally obtainable but has not been legally obtained
 - c. any prescribed drug not legally obtained
 - d. any prescribed drug not being used for the prescribed purpose
 - e. any over-the-counter drug being used at a dosage level other than recommended by the manufacturer or being used for a purpose other than intended by the manufacturer any drug being used for a purpose not in accordance with bona fide medical therapy.

Examples of illegal drugs are cannabis substances, such as marijuana and hashish,

cocaine, heroin, methamphetamine, phencyclidine (PCP), and so-called designer drugs and look-alike drugs.

4.6 Legal drugs means any prescribed or over-the-counter drug that has been legally obtained and is being used for the purpose for which it was prescribed or manufactured.

4.7 Reasonable belief means a belief based on objective facts sufficient to lead a reasonable person to reach a particular conclusion, in this case to conclude that a particular employee is unable to satisfactorily perform his or her job duties due to drug or alcohol impairment. Such inability to perform may be manifested by such things as decreases in the quality or quantity of the employee's productivity, judgment, reasoning, concentration and psychomotor control, and marked changes in behavior or other facts. Accidents, deviations from safe working practices, and erratic conduct indicative of impairment are examples of "reasonable belief" situations.

4.8 Under the influence means a condition in which a person is affected by a drug or by alcohol in any detectable manner. The symptoms of influence are not confined to those consistent with misbehavior, nor to obvious impairment of physical or mental ability, such as slurred speech or difficulty in maintaining balance. A determination of being under the influence can be established by a professional opinion, a scientifically valid test, such as urinalysis or blood analysis, and in some cases by the opinion of a layperson.

5. Education

5.1 Supervisors and other management personnel are to be trained in:

- a. Detecting the signs and behavior of employees who may be using drugs or alcohol in violation of this policy;
- b. Intervening in situations that may involve violations of this policy;
- c. Recognizing the above activities as a direct job responsibility;

5.2 Employees are to be informed of the:

- a. Health and safety dangers associated with drug and alcohol use;
- b. Provisions of this policy.

6. Prohibited Activities

6.1 Legal Drug

- a. An employee whose medical therapy requires the use of a legal drug that may have an effect on the employee's work performance must report such use to his or her supervisor prior to the performance of Grace business. The supervisor who is so informed will contact human resources for guidance. While employees need not inform management

of all medications taken, it is better to err on the side of disclosure if the medication may have an effect on work performance.

- b. Grace at all times reserves the right to judge the effect that a legal drug may have on job performance and to restrict the using employee's work activity or presence at the workplace accordingly.

6.2 Illegal Drugs and Alcohol. The use, sale, purchase, transfer, or possession of an illegal drug or of alcohol by any employee while on Grace premises or while performing Grace business is prohibited.

7. Discipline and Legal Sanctions

- 7.1 Any employee who possesses, distributes, sells, attempts to sell, or transfers illegal drugs on Grace premises or while on Grace business will be subject to disciplinary action, up to and including discharge.
- 7.2 Any employee who is found to be in possession of or under the influence of alcohol in violation of this policy will be subject to discipline up to and including discharge.
- 7.3 Any employee who is found to be in possession of drug paraphernalia in violation of this policy will be subject to discipline up to and including discharge.
- 7.4 Any employee who is found through drug or alcohol testing to have in his or her body a detectable amount of an illegal drug or of alcohol will be subject to discipline up to and including discharge except that, depending on the circumstances of the case and the employee involved, the employee may be offered a one-time opportunity to enter and successfully complete a rehabilitation program that has been approved by Grace. During rehabilitation, the employee will be subject to unannounced drug or alcohol testing. Upon return to work from rehabilitation, the employee will be subject to unannounced drug or alcohol testing for a period of 60 months. Any test that is confirmed as positive during or following rehabilitation will result in discharge.
- 10.5 In addition to the disciplinary action by the College, local, state, and federal laws strictly outline penalties, including fines and jail terms, for the illegal use, possession or distribution of alcohol and drugs. Indiana and federal law provides for fines and/or imprisonment for the unlawful possession, sale, manufacture, or distribution of drugs or alcohol. The amount of the fines and the length of imprisonment vary according to the type and amount of the substance involved, prior violations for such offenses, and a variety of other factors. Legal sanctions for the unlawful distribution of drugs increase if

the substance is distributed to a person under twenty-one years of age or within one thousand feet of the property of a college.

8. Drug and Alcohol Testing of Employees

- 8.1 Grace will notify employees of this policy by:
 - a. Providing to each employee a copy of the policy, and obtaining a written acknowledgement from each employee that the policy has been received and read.
 - b. Announcing the policy in various written communications and making presentations at employee meetings.

- 8.2 Grace may perform drug or alcohol testing:
 - a. Of any employee who manifests behavior that gives rise to a reasonable belief that the person is violating this policy.
 - b. Of any employee who is involved in an accident that results or could result in property damage or personal injury.
 - c. On a random basis of any employee.
 - d. Of any employee who is subject to drug or alcohol testing pursuant to federal or state rules, regulations, or laws.

- 8.3 An employee is required to consent to submit to drug or alcohol testing as a condition of employment and the employee's refusal to consent may result in disciplinary action, including discharge, for a first refusal or any subsequent refusal.

- 8.4 An employee may be suspended pending results of testing when Grace has a reasonable belief that this policy is being violated.

9. Appeal of a Drug or Alcohol Test Result

- 9.1 An applicant or employee whose drug or alcohol test reported positive will be offered the opportunity of a meeting to offer an explanation. The purpose of the meeting will be to determine if there is any reason that a positive finding is in error or could have resulted from some cause other than drug or alcohol use. Grace, through its health and/or human resource officials, will judge whether an offered explanation merits further inquiry.

- 9.2 An employee whose drug or alcohol test is reported positive will be offered the opportunity to:
 - a. Obtain an independent test, at the employee's expense, using the remaining portion of the specimen that yielded the positive result;

- b. Obtain the written test result and submit it to an independent medical review at the employee's expense.
- 9.3 The employee may use Grace's medical benefits, to the extent that coverage may apply, for meeting the costs of (9.2.a) and (9.2.b)
- 9.4 During the period of an appeal and any resulting inquiries, the employment status of an employee may be suspended. An employee who is suspended pending appeal will be permitted to use any available annual leave in order to remain in an active pay status. If the employee has no annual leave or chooses not to use it, the suspension will be without pay.

10. Rehabilitation and Employee Assistance

- 10.1 Rehabilitation assistance in lieu of discharge may be offered:
- a. To any employee who has requested rehabilitation assistance provided that the request is unrelated to an identification of the employee as a violator of this policy.
 - b. To any employee who has violated this policy provided that the violation does not involve selling or transferring illegal drugs, or serious misconduct.
- 10.2 An employee who is in rehabilitation will be suspended, except that—when indicated by the circumstances of the case and the written recommendation of a licensed physician or recognized rehabilitation professional—an employee may be permitted to work while undergoing rehabilitation on an outside-of-work basis. The written recommendation must include a statement to the effect that the employee's presence in the workplace will not constitute a safety hazard to the employee, co-workers or others.
- 10.3 An employee whose rehabilitative therapy involves drug maintenance, hospitalization or detoxification will not be considered for the exception from suspension described in (10.2).
- 10.4 An employee who is in rehabilitation or who has completed rehabilitation may be allowed to return to work upon presentation of a written release signed by a licensed physician or recognized rehabilitation professional. The release must include a statement to the effect that the employee's presence in the workplace will not constitute a safety hazard to the employee, co-worker or others.
- 10.5 Rehabilitation assistance given by Grace will be:
- a. Limited to those medical benefits that may be available in the employee's medical benefits plan.

- b. Obtained through a rehabilitation program that has been pre-approved by Grace.
- c. Obtained by the employee during times that will not conflict with the employee's work time, except that the employee may use any available leave to be absent from the job with pay.

10.6 Grace will provide to any employee, upon request and at no cost to the employee, information concerning local resources that are available for the treatment of drug and alcohol related problems.

11. Inspections and Searches

11.1 Grace may conduct unannounced general inspections and searches for drugs or alcohol on Grace premises or in Grace vehicles or equipment wherever located. Employees are expected to cooperate.

11.2 Search of an employee and his or her personal property may be made when there is reasonable belief to conclude that the employee is in violation of this policy.

11.3 An employee is required as a condition of employment to consent to a search, and the employee's refusal to consent may result in disciplinary action, including discharge, even for a first refusal.

11.4 Illegal drugs, drugs believed to be illegal, and drug paraphernalia found on Grace property may be turned over to the appropriate law enforcement agency and the full cooperation given to any subsequent investigation. Substances that cannot be identified as an illegal drug by a layman's examination may be turned over to a forensic laboratory for scientific analysis.

11.5 If an employee is the subject of a drug-related investigation by Grace or by a law enforcement agency, the employee may be suspended pending completion of the investigation.

12. CONFIDENTIALITY

All information relating to drug or alcohol testing or the identification of persons as users of drugs and alcohol will be protected by Grace as confidential unless otherwise required by law, overriding public health and safety concerns, or authorized in writing by the persons in question.

Appendix E: Community Lifestyle Expectations

GRACE COLLEGE AND SEMINARY Statement on Community Lifestyle Expectations Approved November 4, 2015

Members of the Grace College and Seminary (Grace Schools) community are committed to the mission of the institution and to living in a manner that brings glory to the name of our Lord. To this end we agree to uphold the standards of the community as cited in this statement.

Since members of the Grace Schools community are also members of the broader community of the body of Jesus Christ, it is expected that everything we do will reflect our commitment, both to our Lord and to His body of believers. This commitment is to be demonstrated by faithful involvement in a local evangelical church, Christian loyalty to each other, and pursuit of the fruit of the Spirit – love, joy, peace, patience, kindness, goodness, faithfulness, gentleness, and self-control.

Our beliefs on all topics are based on scripture (2 Timothy 3:16); therefore, the Word of God is the final authority on all matters of *faith and conduct*. Members of the Grace Schools community work hard to demonstrate Christ-like attitudes and actions appropriate for mature Christians in their personal lives and in the life of the community. In seeking to live out the fruit of the Spirit (Galatians 5:22-23) rather than deeds of the flesh (Galatians 5:19-21), items expressly forbidden in the Scripture are not acceptable for members of the Grace Schools community. Examples include pride, greed, lust, slander, drunkenness, profane language, premarital sex, adultery, homosexual behavior, and prejudice (1 Corinthians 6:9-11). We affirm the holy institution of marriage as being between one man and one woman, rooted as it is in God's creation of man and woman and in the relationship of Christ and his church.

Grace Schools values the *worth and dignity of human life*. Having been made in the image of God (Genesis 1:27), those who learn, live, and/or work at the institution are expected to respect and uphold life-affirming practices that distinguish our faith community from other institutions of higher education, particularly for those who are vulnerable members of society. Consistent with a resolution of the Fellowship of Grace Brethren Churches (1982, 1996), Grace Schools believes that human life is worthy of respect and protection at all stages from the time of conception. The sanctity of human life is established by creation (Genesis 1:26-27), social protection (Genesis 9:6) and redemption (John 3:16).

Although Scripture does not provide specific teaching regarding all *social practices* in a given cultural setting, it does speak to our Christian responsibility in areas of conduct that may be harmful or spiritually offensive to ourselves or to others. In keeping with its objectives to develop moral and spiritual leadership, Grace Schools expects members of the community to demonstrate restraint and discretion in entertainment choices, social activities, and personal habits (Galatians 5:13-23), including substances that may harm our physiological and psychological well-being. Without question, the Christian should act in ways that honor the body, which is the temple of the Holy Spirit (Romans 12:1), and God's standard of purity; are morally uplifting; and guide us

to godliness through the use of spiritual disciplines including scripture reading, study, and application; prayer; worship; meditation; evangelism; serving; and stewardship.

All of us have sinned and fallen short of God’s standards in one way or another (Romans 3:23), but if we ask for His forgiveness, His grace and mercy are extended to us (Ephesians 2:4–5). While recognizing the existence of temptation, sin, and lifestyles that are contrary to biblical truth, Grace Schools expects tangible evidence of *life transformation*, commitment to growth in Christ, and sound judgment based on biblical principles. Jesus was full of grace and truth (John 1:14) and, in striving toward His example, we seek as a spiritual community to demonstrate a balance of both.

As a community of believers, therefore, those at Grace Schools strive to carry out both individually and collectively the model for *conflict management and resolution* described in Romans. We make use of biblically-based practices such as arbitration, mediation, grace, restoration, forgiveness, and redemption to live at peace with each other (Romans 12: 16-21) and strive to resolve disagreements in private or within the Christian community using the biblical principles of 1 Corinthians 6:1-8, Matthew 5:23-34, and Matthew 18:15-20 as guidelines.

We acknowledge that God has placed institutions and individuals in positions of *authority* over Christians and our biblical response is one of submission (Romans 13:1-8). God and His word are our final authority and give us guidance in areas such as relationships, marriage, the church, human government, spiritual leaders, and employers. Our testimony in these matters of authority is powerful when our actions are based on biblical truth rather than individual gain. Our responsibility as citizens is submission, but we also have rights as citizens to protection; therefore, although there may be competing interests, we value the right to appeal decisions based on our biblically-informed conscience (Acts 5:29). Grace Schools, however, recognizes and supports only those individual and campus advocacy initiatives that are in alignment with biblical teaching as outlined in this *Statement on Community Lifestyle Expectations* and our *Covenant of Faith*.

Above all, we the members of the Grace Schools community are committed to accurately representing the Lord Jesus Christ on our campus, in our community, and to the ends of the earth.

I affirm my willingness to abide by the Grace Schools’ *Statement on Community Lifestyle Expectations* and understand that policies related to these expectations are detailed in the *Student Handbook*.

Signature

Date _____

Printed Name _____

Appendix F: Compliance Checklist

**Part 86 Drug-Free Schools and Campuses
Regulations Compliance Checklist
Years 2017 and 2018**

1. Does the institution maintain a copy of its drug prevention program? Yes No If yes, where is it located?

2. Does the institution provide *annually to each employee and each student*, who is taking one or more classes for any type of academic credit except for continuing education units, written materials that adequately describe and contain the following?
 - a. Standards of conduct that prohibit unlawful possession, use, or distribution of illicit drugs and alcohol on its property or as a part of its activities
Students: Yes No Staff and Faculty: Yes No
 - b. A description of the health risks associated with the use of illicit drugs and the abuse of alcohol
Students: Yes No Staff and Faculty: Yes No
 - c. A description of applicable legal sanctions under local, state, or federal law
Students: Yes No Staff and Faculty: Yes No
 - d. A description of applicable counseling, treatment, or rehabilitation or re-entry programs
Students: Yes No Staff and Faculty: Yes No
 - e. A clear statement of the disciplinary sanctions the institution will impose on students and employees, and a description of those sanctions
Students: Yes No Staff and Faculty: Yes No

3. Are the above materials distributed to students in one of the following ways?
 - a. Mailed to each student (separately or included in another mailing)
Yes No
 - b. Through campus post office boxes
Yes No
 - c. Class schedules which are mailed to each student
Yes No

d. During freshman orientation

Yes No

e. During new student orientation

Yes No

f. In another manner (*describe*):

4. Does the means of distribution provide reasonable assurance that each student receives the materials annually?

Yes No

5. Does the institution's distribution plan make provisions for providing these materials to students who enroll at some date after the initial distribution?

Yes No

6. Are the above materials distributed to staff and faculty in one of the following ways? a. Mailed

Staff: Yes No

Faculty: Yes No

b. Through campus post office boxes

Staff: Yes No

Faculty: Yes No

c. During new employee orientation

Staff: Yes No

Faculty: Yes No

d. In another manner (*describe*)

7. Does the means of distribution provide reasonable assurance that each staff and faculty member receives the materials annually?

Staff: Yes No

Faculty: Yes No

8. Does the institution's distribution plan make provisions for providing these materials to staff and faculty who are hired after the initial distribution?

Staff: Yes No

Faculty: Yes No

9. In what ways does the institution conduct biennial reviews of its drug prevention program to determine effectiveness, implement necessary changes, and ensure that disciplinary sanctions are enforced?

- a. Conduct student alcohol and drug use survey
Yes No
- b. Conduct opinion survey of its students, staff, and faculty
Students: Yes No Staff and Faculty: Yes No
- c. Evaluate comments obtained from a suggestion box
Students: Yes No Staff and Faculty: Yes No
- d. Conduct focus groups
Students: Yes No Staff and Faculty: Yes No
- e. Conduct intercept interviews
Students: Yes No Staff and Faculty: Yes No
- f. Assess effectiveness of documented mandatory drug treatment referrals for students and employees
Students: Yes No Staff and Faculty: Yes No
- g. Assess effectiveness of documented cases of disciplinary sanctions imposed on students and employees
Students: Yes No Staff and Faculty: Yes No
- h. Other (*please list*)

10. Who is responsible for conducting these biennial reviews?

11. If requested, has the institution made available, to the Secretary and the public, a copy of each requested item in the drug prevention program and the results of the biennial review? Yes
No

12. Where is the biennial review documentation located?

Name:

Title:

Department:

Phone:

E-mail:

13. Comments:

Appendix G: Pro-Health Programming for Employees

Pro-Health Programming for Employees

Run Hard. Rest Well.

In the fall of 2018, a small team of Grace staff attended this two-day event that introduces participants to a transformative way of working, resting, and rhythm in their lives, with a goal of preparing people in high-stress professions to thrive in vibrant, engaging, and sustainable ways. Later that fall, this program was made available on campus to employees. Approximately 40 employees attended this Biblically-based training to “guard against overload.”

Strategic Plan

As part of its current strategic plan developed in 2016, the institution prioritized work/life balance for employees. Consequently, it plans to conduct an employee survey on this topic in 2019, then implement an action plan based on the results to promote improved work/life balance for all employees.

Employee Policy Related to Work/Life Balance

The institution is currently reviewing policy drafts for Flextime and Parental Bonding Leave to support working parents.

Health and Wellness Initiatives for Employees

Examples of health and wellness initiatives designed for individual or groups of employees include the following, which are advertised in the *GracEquip Newsletter*:

1. Charity Mile
2. Wellness Fair
3. NutriU Challenge
4. Leave the Office ASAP – lunchtime workout
5. An Active Approach to Wellness workshops
6. YMCA Corporate Challenge
7. Healthier You: Strong Core Summer Group class

Employee Programs to Reduce Stress

Examples of education provided to employees to reduce stress include the following, which are voluntary. These are advertised in the *GracEquip Newsletter*.

1. Financial Wellness & Security/Theft Protection
2. Understanding Pay Statements (following a change in health benefits)
3. Understanding HAS – Lunch & Learn
4. 7 Habits of Highly Effective People Pilot
5. Financial Security – Lunch & Learn