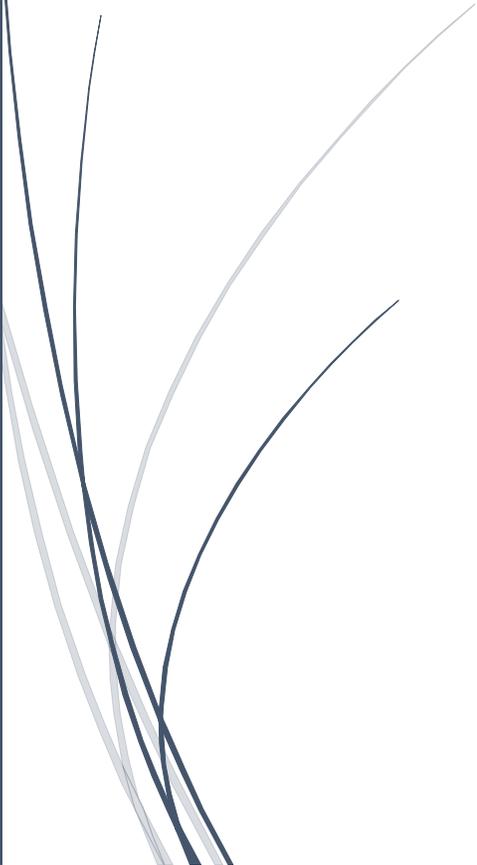




5/21/2015

# Biennial Review of AOD Programs at Clarendon College

Academic Years 2012-2013 & 2013-2014



Clarendon College Biennial Review Team  
EDITED BY TEX BUCKHAULTS

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## EXECUTIVE SUMMARY:

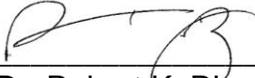
A Department of Education compliance review for Clarendon College's administration of the programs authorized pursuant to Title IV, HEA programs was conducted from January 12, 2015 – January 16, 2015. This report, the Biennial Review of AOD Programs at Clarendon College – Academic Years 2012-2013 to 2013-2014 addresses Finding 3 – Drug and Alcohol Abuse Prevention Programs Requirements Not Met – Multiple Violations.

As part of the required action a team, called the BRT, was formed to conduct a comprehensive biennial review of AOD programs at Clarendon College. The findings of this team closely resemble the findings of the compliance review and are listed below.

1. Clarendon College failed to develop and implement a comprehensive DAAPP,
  - a. The BRT findings concur with the DOE review team findings.
  - b. A framework to implement a comprehensive DAAPP does exist.
  - c. The BRT offered recommendations to correct this finding.
2. The biennial review did not review the effectiveness of the DAAPP
  - a. The BRT findings concur with the DOE review team findings.
  - b. The DAAPP did not have goals or measurable objectives to be able to conduct a measure of effectiveness of the DAAPP.
  - c. The BRT offered recommendations to correct this finding.
3. The biennial review did not evaluate the consistency of sanctions imposed for violations of the College's disciplinary standards and codes of conduct;
  - a. The BRT findings concur with the DOE review team findings.
  - b. The BRT reviewed the consistency of sanctions and found sanctions and violations are consistently enforced and assessed.
  - c. The BRT offered recommendations to correct this finding.
4. The college did not distribute a materially complete AOD Program information to academic students and employees.
  - a. The BRT findings concur with the DOE review team findings.
  - b. A framework to correctly distribute the AOD Program information to academic students and employees does exist.
  - c. The BRT offered recommendations to correct this finding.
  - d.

The Biennial Review Team made 13 recommendations for the AOD program as part of the Comprehensive Biennial Review. It is the opinion that successful implementation of the 13 recommendations will bring Clarendon College in compliance with the Drug Free Schools and Campuses Regulations (34 CFR Part 86) of the Drug-Free Schools and Communities Act.

This document has been reviewed and approved by the Clarendon College Board of Regents at a regular board meeting on May 21, 2015.

  
\_\_\_\_\_  
Dr. Robert K. Riza, President  
Clarendon College

5/27/15  
Date

## **INTRODUCTION:**

The Drug Free Schools and Campuses Regulations (34 CFR Part 86) of the Drug-Free Schools and Communities Act (DFSCA) requires Clarendon College to certify implementation of programs to prevent the abuse of alcohol and use or distribution of illicit drugs by its students and employees on College property and as a part of any activities. At a minimum Clarendon College must annually distribute the following in writing to all students and employees:

- Standards of conduct that clearly prohibit the unlawful possession, use or distribution of illicit drugs and alcohol;
- A description of the legal sanctions under local, state, or federal law for the unlawful possession or distribution of illicit drugs and alcohol;
- A description of the health risks associated with the use of illicit drugs and the abuse of alcohol;
- A description of any drug or alcohol counseling, treatment, or rehabilitation or reentry programs that are available to employees or students; and
- A clear statement that the institution will impose sanctions on students and employees and a description of those sanction, up to and including suspension, expulsion or termination of employment and referral for prosecution, for violations of the standards of conduct.

Further requirements are for Clarendon College to conduct a biennial review of its program with the following objectives:

- Determine the effectiveness of the Drug and Alcohol Abuse Prevention Program (DAAPP) and relevant policies and implement changes to the DAAPP if needed; and
- To ensure that the sanctions developed are enforced consistently.

The biennial review must also include a determination as to:

- The number of drug- and alcohol-related violations and fatalities occurring on the campuses, or as part of their activities that are reported to campus officials; and
- The number and types of sanctions Clarendon College imposed on students or employees as a results of such violations or fatalities.

## REGULATORY REQUIREMENTS:

Clarendon College acknowledges the legal obligation to 1. Comply with the DOE to provide a copy of the biennial report on request, 2. Conduct a biennial review of the College's compliance with the DFSCA and is conducting a comprehensive review in response to a Department of Education audit in January 2015 which found the College with multiple violations of the provisions of the DFSCA and EDGAR Part 86 regulations.

### Finding 3: Drug and Alcohol Abuse Prevention Program Requirements Not Met

The multiple violations specifically are:

- Clarendon College failed to develop and implement a comprehensive DAAPP, although some related information and activities were available;
- The biennial review failed to meet regulatory requirements by;
  - not reviewing the effectiveness of the DAAPP; and
  - the consistency of sanctions imposed for violations of the College's disciplinary standards and codes of conduct;
  - and to produce a biennial report of these findings.
- Clarendon College failed to deliver a materially-complete DAAPP disclosure to all employees and students enrolled for academic credit;

## COMPREHENSIVE BIENNIAL REVIEW:

The team responsible for conducting the comprehensive biennial review is listed in Table 1.

<b>Name</b>	<b>Title</b>	<b>Campus / Center Area of Responsibility</b>
Texas D. "Tex" Buckhaults	Vice President of Student Services / SACSCOC Liaison	Clarendon Campus Pampa Center Childress Center Amarillo Center
Lana Ritchie	Vice President of Administrative Services	Clarendon Campus Pampa Center Childress Center Amarillo Center
David Hall	Associate Dean of Pampa Center and Career, Technical, & Continuing Ed.	Pampa Center Amarillo Center

Brad Vanden Boogaard	Director of Student Life	Clarendon Campus Pampa Center Childress Center Amarillo Center
Aaron Lopez	Director of Childress Center	Childress Center

Information for the review is being provided by employees as shown in Table 2.

<b>TABLE 2 – BIENNIAL REVIEW TEAM INFORMATION PROVIDERS</b>	
<b>Area of Informational Reporting</b>	<b>Name(s)</b>
Residence Hall Directors	Rian Stubbs Debra Lamb Jay Anders Shay Hand
Director of Student Life	Brad Vanden Boogaard
Director of Institutional Research	Robert Taylor
Academic Advising	Becky Green Dustin Hennessey Aaron Lopez
Athletic Coaches & Assistant Coaches	Addie Lees Zack Leggett Devin McIntosh Cody Heck Bret Franks Rian Stubbs Jerry Cervantez Melvin Balogh Amanda Fefel Shanna Smith
Human Resource Officer	Ashlee Estlack
Learning Resource Center	James Gordon Mona Hennessey

The intention of this document is to meet the statutory requirements for conducting a biennial review and to also summarize the programs and activities related to alcohol and drug prevention on the Clarendon College campus and centers during the 2013-2014 and 2014-2015 academic years.

## INFORMATIONAL REVIEW:

The following information was reviewed and examined as part of the review process:

- AOD information provided to academic students attending Clarendon College;
- CC policies related to AOD
- AOD policies at other similar and local institutions of higher education.
- Policy review of AOD policies from policy manual for students and employees
- Policy review of AOD policies from Student Handbook.
- Policy review of AOD policies from Personnel Manual
- Inventory of AOD free student activities.
- Inventory of AOD related programs for drug and alcohol prevention.
- Resources available to academic students and employees of Clarendon College.
- Local / State and Federal regulations related to AOD.
- Campus Security Annual Reports

The Biennial Review Team (BRT) initially conducted a compliance check-list. This check-list is taken from *Appendix 2 of the Complying with the Drug-Free Schools and Campus Regulations – A Guide for University and College Administrators*.

## Appendix 2

### Part 86 Compliance Checklist

#### Drug-Free Schools and Campuses Regulations Compliance Checklist

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

*Note: The BRT found a few directives on environmental management, drug dog use and policy enforcement. An organized DAAPP was not found. The BRT recommends a copy of the DAAPP be maintained in the Vice President of Student Services Office and the Director of Student Life's Office.*

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

*Note: The BRT found a document which contained the policies but students, faculty and staff were not provided formal written notification in a standard manner over the past two years.*

- 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

*Note: The BRT found health risks published in the student handbook but nothing in an employee handbook on health risks. The health risks were published in the student handbook but the student handbook was not distributed to all academic students.*

- c. A description of applicable legal sanctions under local, state, or federal law

Students: Yes  No

Staff and Faculty: Yes  No

*Note: The BRT found adequate description of student sanctions but did not find a staff and faculty description of legal sanctions. The student sanctions was published in the student handbook but was not distributed to all academic students.*

- d. A description of applicable counseling, treatment, or rehabilitation or re-entry programs.

Students: Yes  No

Staff and Faculty: Yes  No

*Note: The BRT found a policy describing counseling, treatment, or rehabilitation or re-entry programs for faculty and staff but did not find a description for students. The faculty and staff policy was not distributed to all faculty and staff.*

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 offices boxes  
Yes  No
- c. Class schedules which are mailed to each student  
Yes  No
- d. During freshman orientation (*BRT – Learning Frameworks*)  
Yes  No
- e. During new student orientation (*BRT – Bulldog Days*)  
Yes  No
- f. In another manner? (*BRT – Mandatory Residence Hall Meetings*)  
Yes  No

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

Yes  No

*Note: BRT did not find an organized and clear method of notification.*

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

Yes  No

- b. Through campus post office boxes

Yes  No

- c. During new employee orientation

Yes  No

- d. In another manner?

Yes  No

*Note: The BRT did not find an organized method of distribution employees.*

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

Yes  No

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

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

Yes  No

- c. Evaluate comments obtained from a suggestion box

Yes  No

- d. Conduct focus groups  
Yes  No
- e. Conduct intercept interviews  
Yes  No
- f. Assess effectiveness of documented mandatory drug treatment referrals for students and employees.  
Yes  No
- g. Assess effectiveness of documented cases of disciplinary sanctions imposed on students and employees.  
Yes  No
- h. Other  
Yes  No

*Note: The BRT did not find any method other than professional judgment and/or anecdotal evidence was used to determine effectiveness. While the student government organization provided some input during the fall 2014 semester the instruction and description of the request was vague and students did not seem to understand the questions being asked of them.*

10. Who is responsible for conducting these biennial reviews?

Vice President of Student Services and a Biennial Review Team.

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

*Note: These items will be made available by June 15, 2015.*

12. Where is the biennial review documentation located?

In the Vice President of Student Services Office

Name: Tex Buckhaults

Phone: 806-874-4807

E-mail: [tex.buckhaults@clarendoncollege.edu](mailto:tex.buckhaults@clarendoncollege.edu)

In the office of the Director of Student Life

Name: Brad Vanden Boogaard

Phone: 806-874-4861

E-mail: [brad.vandenboogaard@clarendoncollege.edu](mailto:brad.vandenboogaard@clarendoncollege.edu)

*Note: The BRT did not find evidence of an organized or materially complete DAAPP at Clarendon College. The College does have policies in place to make the environment less conducive to alcohol and other drugs. The College does strictly ban and strictly enforce these policies. The BRT found a clear disciplinary guidelines that are fairly and consistently enforced across all student populations. The BRT did not find any evidence the College has used any means to collect data from students and/or employees on their perceptions, attitudes, or feelings about alcohol or other drugs at Clarendon College. While this is a system (Clarendon, Amarillo, Childress, and Pampa) issue the BRT felt that the strongest portion of the AOD needed to focus primarily on the Clarendon campus as the resident population has the least adult responsibilities, the most discretionary funds and the most leisure time. Targeting the DAAPP at the traditional student population at the Clarendon Campus would have the strongest impact and result in more effective AOD program. The BRT would recommend that the previous statement be backed up by means of data collection and other effectiveness measures.*

*The BRT team has included a supplemental check-list from Appendix 6 of the Complying with the Drug-Free Schools and Campus Regulations – A Guide for University and College Administrators. This check-list is included as it demonstrated the College has or is meeting some of the “Best Practices” for a DAAPP at the College. While an organized DAAPP was clearly not present over the past two years, the framework for quickly implementing an organized and strong DAAPP clearly exists at the College. The BRT felt a comprehensive and organized DAAPP would be successfully implemented in the Fall 2015 semester.*

## Appendix 6

### Part 86 Supplemental Checklist

#### 1. Description of the AOD Program Elements

##### 1. Alcohol-Free Options

How does your campus provide an environment with alcohol-free options?

Please check all that apply:

- Alcohol-free events and activities are created and promoted.
- Student service learning or volunteer opportunities are created, publicized, and promoted.
- Community service work is required as part of the academic curriculum.
- The campus offers a student center, recreation center, coffeehouse, or other alcohol-free settings.
- The student center, fitness center, or other alcohol-free settings have expanded hours.
- Nonalcoholic beverages are promoted at events.
- Does not promote alcohol-free options.

##### 2. Normative Environment

How does your campus create a social, academic, and residential environment that supports health-promoting norms?

Please check all that apply:

- College admissions procedures promote a healthy environment.
- The academic schedule offers core classes on Thursdays, Fridays, and Saturdays.
- Exams/projects increasingly require class attendance and academic responsibility.
- Substance-free residence options are available.
- The campus encourages an increase in academic standards.
- Faculty and staff are educated about behavioral indicators, student norms, and cultural attitudes related to high-risk or illegal alcohol use.
- Faculty and staff are educated about behavioral indicators, student norms, and cultural attitudes related to illicit drug use.
- Faculty are encouraged to engage in a higher level of contact with students.
- Students are educated about misperceptions of drinking norms.
- Student leadership (e.g., orientation leaders, resident assistants, fraternity and sorority members, athletes, student organizations) promotes positive, healthy norms.
- Students have opportunities to advise and mentor peers.
- Pro-health messages are publicized through campus and community media channels.
- Does not promote a normative environment.

### 3. Alcohol Availability

How does your AOD prevention program limit alcohol availability?

Please check all that apply:

- Alcohol is banned or restricted on campus.
- Alcohol use is prohibited in public places.
- Delivery or use of kegs or other common containers is prohibited on campus.
- Alcohol servers are required to be registered and trained.
- Server training programs are mandatory.
- Guidelines for off-campus parties are disseminated.
- The number and concentration of alcohol outlets near campus are regulated.
- The costs of beer and liquor licenses are raised.
- The days or hours of alcohol sales are limited.
- The container size of alcoholic beverages is reduced.
- Alcohol is regulated by quantity per sale.
- Keg registration is required.
- State alcohol taxes are increased.
- Does not limit alcohol availability.
- Other – All alcohol found on campus is confiscated.

### 4. Marketing and Promotion of Alcohol

How does your AOD prevention program limit marketing and promotion of alcohol on and off campus?

Please check all that apply:

- Alcohol advertising on campus is banned or limited.
- Alcohol industry sponsorship for on-campus events is banned or limited.
- Content of party or event announcement is limited.
- Alcohol advertising in the vicinity of campus is banned or limited.
- Alcohol promotions with special appeal to underage drinkers is banned or limited.
- Alcohol promotions that show drinking in high-risk contexts is banned or limited.
- Pro-health messages that counterbalance alcohol advertising are required.
- Cooperative agreements are endorsed to institute a minimum price for alcoholic drinks.
- Cooperative agreements are endorsed to limit special drink promotions.
- "Happy hours" is eliminated from bars in the area.
- The sale of shot glasses, beer mugs, and wine glasses at campus bookstores is banned.
- Does not restrict marketing and promotion of alcohol.

## 5. Policy Development and Enforcement

How does your AOD prevention program develop and enforce AOD policies on and off campus?

Please check all that apply:

- On-campus functions must be registered.
- ID checks at on-campus functions are enforced.
- N/A Undercover operations are used at campus pubs and on-campus functions.
- Patrols observe on-campus parties.
- Patrols observe off-campus parties.
- Disciplinary sanctions for violation of campus AOD policies are increased.
- Criminal prosecution of students for alcohol-related offenses is increased.
- Driver's licensing procedures and formats are changed.
- Driver's license penalties for minors violating alcohol laws are enforced.
- Sellers/servers are educated about potential legal liability.
- ID checks at off-campus bars and liquor stores are enforced.
- Penalties for sale of liquor to minors are enforced.
- Laws against buying alcohol for minors are enforced.
- Penalties for possessing fake IDs are enforced.
- Undercover operations are used at retail alcohol outlets.
- DUI laws are enforced.
- Roadblocks are implemented.
- Open house assemblies are restricted.

N/A Dram shop laws that apply legal action for serving intoxicated drinkers or minors are established.

- Does not develop or enforce AOD policies.

**B. A Statement of AOD Program Goals and a Discussion of Goal Achievement**

Please state your AOD program goals:

*Note: The BRT did not find any articulated or directed goals. The goals listed are recommended goals the BRT strongly encourages the College adopt and implement.*

1. Articulate and consistently enforce clear policies that promote an educational environment free from substance use/abuse.
2. Provide ongoing education for members of the campus community for the purpose of preventing alcohol abuse and other drug use.
3. Provide a reasonable level of care for substance abusers through counseling, treatment, and referral.
4. Implement campus activities that promote and reinforce health, responsible living, respect for community and campus standards, individual responsibility on the campus, and intellectual, social, emotional, spiritual or ethical, and physical well-being of the members.
5. Be vocal in combating the negative issues surrounding alcohol and other drug use and abuse on campus.

Please describe how these goals were achieved:

*Note: While these goals were not adopted; had they been adopted the BRT feels the following statements would have been applicable.*

1. The AOD policies of CC are clear and are consistently enforced that promote an environment free from substance use / abuse.
  - a. Evidence in disciplinary referrals / arrests and sanctions.
  - b. Evidence of consistent policy administration for suspension for possession / use of drugs.
2. A bare minimum of education is provided this is done primarily in the Learning Frameworks course.
3. A clear policy is in effect for students and employees who self-identify as having a problem prior to disciplinary sanctions, suspension or termination. The cost of care is at the students/employees expense. No students or employees have self-identified in the two previous years.
4. This goal, had it existed, would have been the most successfully implemented goal. There is much evidence that is available to demonstrate the College promotes and reinforces student and employee health, responsible living, respect for community and campus standards, individual responsibility on the campus, and intellectual, social, emotional, spiritual or ethical, and physical well-being of the members.
  - a. Evidence in activities.
  - b. Evidence in employee participation in activities.
  - c. Evidence in use of fitness center.
  - d. Evidence in increased use of LRC and Library.
  - e. Evidence in campus ministries. JUMP

5. This goal, had it existed, would have evidence of being achieved as over the past two years the College has greatly increased its position on being vocal about the negative issues of AOD use.
  - a. No tolerance policy (suspension) for drug use.
  - b. No tolerance policy for fighting. (Typically alcohol or other drugs are involved.)
  - c. Increased fines for alcohol disciplinary referrals.
  - d. Increased use of the DCSO for campus patrols.
  - e. Increased teamwork with DSCO and Donley County Judge.
  - f. Two student trips to state-wide conferences on AOD.

### **C. Summaries of AOD Program Strengths and Weaknesses**

#### **Weaknesses:**

The AOD program (DAAPP) at Clarendon College was not organized or consistently administered over the past two years. No evidence of program goals having ever existed is present. No surveys of students or employees concerning AOD was gathered over the past two years. No qualitative data has been collected over the past two years. While quantitative data exists it was not gathered or collected as part of an organized AOD program.

#### **Strengths:**

The administration, staff and student leaders of Clarendon College are positive and are focused to implement a comprehensive DAAPP / AOD program in the Fall 2015. The framework to implement and sustain a truly viable DAAPP /AOD program is in place.

### **D. AOD Policy**

#### **1. Policy Contents**

What information do you distribute to employees and students (taking one or more classes for academic credit, not including continuing education)?

Please check all that apply:

- A description of the health risks associated with alcohol abuse and the use of illegal drugs.
- A description of applicable legal sanctions under local, state, and federal laws.
- A description of any treatment, counseling, rehabilitation, or re-entry programs available at your institution.
- A statement of the institution's disciplinary measures regarding alcohol and illegal drug use by students and employees.

*Note: The BRT team found policies as indicated in the check list. These policies were not distributed to students and employees in a consistent and verifiable manner. The missing item in the check list is in policy, however; a listing of counselors, facilities for treatment, and rehabilitation / re-entry programs was not available over the past two years.*

## **2. Policy Distribution**

Where does your institution publicize its alcohol or other drug policy?

Please check all that apply:

Student handbook

Staff and faculty handbook (personnel handbook)

Admissions materials

Course catalogs

n/a Class schedules (These materials are no longer provided in written form)

Employee paychecks

Student's academic orientation (Learning Frameworks)

Residence hall orientation (twice per year)

Staff and faculty orientation

Formal speaking engagements

## **E. Recommendations for Revising AOD Prevention Programs**

The Biennial Review Team (BRT) offers several recommendations for improving the Alcohol and Other Drug (AOD) Policy to assist the College in implementation of a comprehensive Drug and Alcohol Abuse Prevention Program (DAAPP) that meets and/or exceeds statutory requirements.

1. Adopt and implement AOD Policy program goals on a two year cycle... (See item B Program Goals and Objectives previously iterated)
2. Adopt and implement measurable (both quantitative and qualitative) AOD Objectives.
3. Collect data through the use of evidentiary documentation (activity promotional flyers, signage, public service announcement video clips, etc.), employee and student surveys, Sheriff's office call log, Drug Dog Reports.
4. Involve student organizations in reducing AOD issues on campus through the use of an incentive program.
5. Continue to strictly enforce AOD sanctions for students and employees.
6. Utilize current resources available (student handbook, course catalog, personnel handbook, email, website, student portal, faculty portal, employee business portal, Bulldog Alert, and electronic signage) to distribute AOD Program Report information to students and employees in a consistent and constant manner.

7. Ensure that legal sanctions are current with federal, state, and local requirements.
8. Ensure that health risks are updated.
9. Ensure the disciplinary sanctions are updated and are published in the AOD Program Report.
10. Research treatment, counseling, rehabilitation, or re-entry programs available and compile a list.
11. Publish a complete AOD Program Report that includes items from recommendations 1,2,3,4,5,6,7, 8 and 9.
12. Ensure the AOD / DAAPP is available to students and employees in a manner that makes it available to all academic students and all employees regardless of start or hire date.
13. Conduct another Biennial Review at the conclusion of 2015-2016 academic year to ensure recommendations 1-11 have been implemented. This will assist the College in meeting the typical requirements of an “even-numbered years” as indicated in the *Complying with the Drug-Free Schools and Campus Regulations – A Guide for University and College Administrators*