

Biennial Review

Kelley Education Inc.

- *University of Aesthetics & Cosmetology*
- *University of Aesthetics & Cosmetology*
- *Professional Cosmetology Education Center*

September, 2019

Certification of the Biennial Review

We certify that this Institution has met the standards to determine the effectiveness of our policies toward AOD and find no changes at this time. Further, we have determined that we have consistently enforced our policies and discipline:

As President of the University of Aesthetics & Cosmetology - Chicago, IL; University of Aesthetics & Cosmetology - Downers Grove, IL; & Professional Cosmetology Education Center, El Dorado, AR, I have read this report and support the Alcohol and Other Drug Policies.

Prepared By:

Robert Kelley
President
Kelley Education Inc.

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Introduction

The Drug Free Schools and Campuses Regulations (34 CFR Part 86) of the Drug-Free Schools and Communities Act (DFSCA) require an institution of higher education (IHE) to certify it has adopted and implemented programs to prevent the abuse of alcohol and use or distribution of illicit drugs both by students and employees both on its premises and as a part of any of its activities. At a minimum each IHE 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 by students and employees;
- 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 any drug or alcohol counseling, treatment, or rehabilitation or re-entry programs that are available to employees or students;
- 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.

Further, the Drug-Free Schools and Communities Act (DFSCA) requires institutions of higher education to conduct a biennial review of their alcohol and other drug policies and prevention programs in order to identify and implement needed changes.

The biennial review has two objectives:

1. To determine the effectiveness of, and to implement any needed changes to the Alcohol and Other Drug (AOD) prevention program, and
2. To ensure that campuses enforce the disciplinary sanctions for violating standards of conduct consistently

The biennial review must include:

1. the number of drug and alcohol-related violations and fatalities that occur on a school's campus or as part of any of the school's activities and that are reported to campus officials; and
2. the number and type of sanctions that are imposed by the school as a result of drug and alcohol-related violations and fatalities on the school's campus or as part of any of the school's activities.

The following is the report resulting from the biennial review of the Alcohol and Other Drug (AOD) prevention program implementation and policy development/enforcement at each campus of Kelley Education Inc. hereinafter referred to as "the Institution."

Report Period & Update

Previously, this report was performed every other July in years ending in an odd number and is for a period of two years. Beginning in 2019, the Biennial Review will be for October publication. We feel this will be consistent with the Biennial Review of our DAAPP Disclosure for Employees & Students.

Report Availability

This report is available from the President. The master copy may be found in the office of the President. This report is also published on the homepage of each school's official website.

Printed copies are available upon request as is our Annual Security Report (ASR).

Previous reports are discarded and replaced by each new copy. This report is available in printed and .pdf (electronic) formats.

Campus	Annual Security Biennial Report Location
Professional Cosmetology Education Center El Dorado, AR	www.pcec.edu/annual-security-biennial
University of Aesthetics & Cosmetology Downers Grove, IL	www.uofac.edu/annual-security-biennial
University of Aesthetics & Cosmetology Chicago, IL	www.universityofaesthetics.edu/annual-security-biennial

Report Notification

This Institution publishes policy information in its School Catalog, Consumer Information, Annual Security Report & Security Policy Update (published annually before October 1st), and Policies & Procedures Manual and through the admissions process with specific forms for enrollees and prospective students.

Employees are directed to their respective campus website's link to Consumer Information and Security Report once annually in October. New hires are directed upon employment.

Students and employees may request (written or oral forms), from the President, a current update prior to publication.

AOD (Alcohol & Other Drug) Prevention Goals

1. Reduce harmful consequences of high-risk drinking by using, where applicable, the environmental management strategy framework recommended by the Higher Education Center for Alcohol and Other Drug and Violence Prevention ("Higher Education Center") including:
 - a. Alcohol free program options (we do not have any alcohol programs)
 - b. Creating an environment that promotes "health-promoting norms" (we do this through our curriculum and special guest speakers)

- c. Reducing alcohol availability (we do not provide it at any school functions and it is limited to two drinks per adult at employee only parties; such as, our year end party).
 - d. Limiting marketing and promotion of alcohol (we do not promote or market alcohol)
 - e. Developing and enforcing clear policies (through our School Catalog, Consumer Information and our Policies and Procedures Manual)
2. Provide ongoing education and prevention strategies (through guest speakers where and as available)
 3. Remain available with local groups to strengthen awareness and participation with any potential partners
 4. Provide an opportunity to find support through bulletin boards, publications, and in discussion.
 5. Comply with Federal and State laws regarding AOD abuse and prevention
 6. Improve academic success, well-being, completion, graduation, licensure, and job placement
 7. Encourage employees and students in making informed lifetime personal decisions and in practicing healthy behavior.

Policies & Procedures – Drug & Alcohol Abuse Education & Prevention Program (DAAPP)

This institution employs Drug & Alcohol Abuse Education & Prevention within its Policies & Procedures. These Policies & Procedures may be found:

- (i) Administration related - Policies & Procedures Manual
- (ii) Student related - Consumer Information, Annual Security Report & Security Policies Update, & Official School Catalog
- (iii) Effective 2019, we have created a separate, printed hand out “DAAPP Disclosure for Employees & Students”

Included in the above:

- Notice of Federal Student Financial Aid Penalties for Drug Law Violations
- Drug and Alcohol Abuse Prevention Program
- How does Drug Use Affect Health?
- Annual Security Report & Security Policies Update
- Important Numbers

The following are found in our Policies and Procedures Manual:

- Institution Admissions Responsibilities – Drug Policy; Drug Free School
- Orientation Policy-Advising and Counseling Students Policy

Kelley Education Inc. reminds its employees annually, during employee & student orientation, & throughout the year through new classes & existing classes:

- (i) Our standards of conduct re: possession, use, & distribution of drugs & alcohol

- (ii) Possible sanctions for violations of Federal, state, & local drug & alcohol laws as well as sanctions for violation of institutional policies
- (iii) Health Risks!
- (iv) Information on counseling, rehabilitation, & treatment programs
- (v) That Kelley Education Inc. will impose sanctions on students & employees who violate drug & alcohol laws, ordinances, and/or institutional policies.

Effectiveness of DAAPP & Consistency of Sanctioning Processes

Several years ago, 2012, we were notified of possible prescription drug abuse by an employee at our El Dorado, campus. This was addressed with the employee who agreed to required treatment at a drug rehabilitation facility that was sponsored by KEI. Following subsequent abuses, she was separated from the school.

Reporting Period (July, 2017-September, 2019) – University of Aesthetics & Cosmetology – Chicago, IL campus

Drug and Alcohol Incidents

<u>Date</u>	<u>Location</u>	<u>Person(s)</u>	<u>Description</u>	<u>Result</u>
N/A	N/A	N/A	N/A	N/A

Summary of Fatalities, Violations

Total Number of Drug and Alcohol Related Fatalities	0
Total Number of Drug and Alcohol Related Violations	0
Total Number of Drug and Alcohol Related Fatalities	0
Total Number of Drug and Alcohol Related Violations	0

Summary of Cases and Sanctions

Cases Dismissed	0
Suspension (Student)	0
Suspension (Employee)	0
Termination (Student)	0
Termination (Employee)	0
Cases Dismissed	0
Suspension (Employee)	0
Suspension (Employee)	0
Termination (Student)	0
Termination (Employee)	0

Reporting Period (July, 2017-September, 2019) – University of Aesthetics & Cosmetology – Downers Grove, IL campus

Drug and Alcohol Incidents

<u>Date</u>	<u>Location</u>	<u>Person(s)</u>	<u>Description</u>	<u>Result</u>
N/A	N/A	N/A	N/A	N/A

Summary of Fatalities, Violations

Total Number of Drug and Alcohol Related Fatalities	0
Total Number of Drug and Alcohol Related Violations	0
Total Number of Drug and Alcohol Related Fatalities	0
Total Number of Drug and Alcohol Related Violations	0

Summary of Cases and Sanctions

Cases Dismissed	0
Suspension (Student)	0
Suspension (Employee)	0
Termination (Student)	0
Termination (Employee)	0
Cases Dismissed	0
Suspension (Employee)	0
Suspension (Employee)	0
Termination (Student)	0
Termination (Employee)	0

Reporting Period (July, 2017-September, 2019) – Professional Cosmetology Education Center – El Dorado, AR campus

Drug and Alcohol Incidents

<u>Date</u>	<u>Location</u>	<u>Person(s)</u>	<u>Description</u>	<u>Result</u>
N/A	N/A	N/A	N/A	N/A

Summary of Fatalities, Violations

Total Number of Drug and Alcohol Related Fatalities	0
Total Number of Drug and Alcohol Related Violations	0
Total Number of Drug and Alcohol Related Fatalities	0
Total Number of Drug and Alcohol Related	0

Violations	
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Summary of Cases and Sanctions

Cases Dismissed	0
Suspension (Student)	0
Suspension (Employee)	0
Termination (Student)	0
Termination (Employee)	0
Cases Dismissed	0
Suspension (Employee)	0
Suspension (Employee)	0
Termination (Student)	0
Termination (Employee)	0

Findings

The President conducted an extensive and comprehensive study of this Institution's policies on drug and alcohol, related programs, services, Federal and State laws (IL and AR), this Institution's procedures, and any cases that have occurred. The President reviews this report with each Advisory Committee for each campus annually.

The President has found that all employees and students receive information:

- Standards of Conduct that clearly prohibit the unlawful possession, use or distribution of illicit drugs and alcohol by students and employees;
- Descriptions of legal sanctions under local, state, and federal law for the unlawful possession or distribution of illicit drugs and alcohol;
- Descriptions of drug/alcohol counseling, treatment, or rehabilitation or re-entry programs that are available to employees or students; and, employees and a description of those sanctions, up to and including termination (student or employee) and referral for prosecution, for violations of the standards of conduct.

Based upon the review, the President found:

- That we have an effective AOD Policy which needs to be constantly updated; and,
- We consistently enforce the policies that have been developed to address any violation of policy(-ies) and/or standards of acceptable behavior related to AOD abuse; yet we need to do a better job of verification.
- We can improve drug prevention with more posters, PowerPoint presentations, & more encouragement from local resources to visit our campuses to increase awareness
- The IL Attorney General has added requirements for IHEs to report to the State of IL annually.
- We have added sexual harassment training for employees; added educational Powerpoints for our students; added descriptive posters; & we have increased sources of help for victims.

- We have added an annual security report that focuses on sexual harassment. That report is also published on our website & its availability is provided to employees & students.

Recommendations from the Previous Biennial Reports

1. Try to find local groups to promote awareness and treatment through guest speakers
2. Update and improve sources of help and support for those who might seek help
3. Develop better prevention efforts targeting the abuse of prescription drugs
4. Incorporate national surveys

Actions on the Recommendations from the Previous Biennial Report

1. We have identified additional groups near each of our 3 campuses & provided information on our campuses; we plan to post these to our websites; added these to our Annual Security Report; & discussed these during New Student Orientations.
2. We have identified additional sources for each of our 3 campuses & provided information on our campuses; we plan to post these to our websites; & discussed these during New Student Orientations.
3. Regarding preventing abuse of prescription drugs, we have had the most concern at our El Dorado, AR campus. We have spoken with local law enforcement & encouraged their physical presence to talk about drug use & criminal prosecution. We have also allowed local law enforcement to conduct practice drug dog drills.
4. We have not incorporated national surveys.

Improvements since the Previous Biennial Reports

Alcohol & Other Drug Use

We have added more descriptions of specific alcohol & other drug use; the criminal penalties; symptoms & behavior performance clues.

Intervention

We have added, to our Annual Security Report, additional information about intervention; including, but not limited to the protection of bystanders. This has been done to encourage reporting of criminal events, if they happen to our employees & students on or off the campus.

Preventing Sexual Violence in Higher Education Act (IL)

The Preventing Sexual Violence in Higher Education Act (110 ILCS 155/) eff. 08/21/15 requires institutions of higher education to file an Annual Report per IL Attorney General requirements. The annual report further requires institutions of higher education to implement specific training & posting collateral materials.

We have included a copy of the report on our website.

Kelley Education Inc. has found that this initiative has improved sexual harassment awareness among students & our employees. We will continue to source new teaching & collateral materials to raise awareness.

Most importantly, these initiatives will help direct victims to sources of assistance.

VAWA

Since our last Biennial Report, we have become increasingly aware of the Violence Against Women Act & the IL Attorney General's requirements from IHEs.

We have added posters about identification of Sexual Harassment, purchased PowerPoint presentations, & purchased videos about Sexual Harassment. This has helped us train our employees & provided education for our students.

We have created sign-in sheets for employees as well as students to verify their training in these classes.

Reference Materials

The following reference materials have helped in the consideration of policies and in this review.

- US Department of Health & Human Services Office of Civil Rights
<http://www.hhs.gov/ocr/office/index.html>
- US Department of Education
 - <https://www.ifap.ed.gov/fsahandbook/attachments/1213FSAHbkVol2Ch8.pdf>
 - <http://www.ifap.ed.gov/regcomps/attachments/86.pdf>
- Complying with the Drug-Free Schools and Campuses Regulations
<http://www.higheredcompliance.org/resources/resources/dfscr-hec-2006-manual.pdf>
- Clery Center <http://clerycenter.org/>
- The Drug-Free Schools and Campuses Regulations (EDGAR Part 86), A Guide for University and Campus Regulations prepared by the Higher Education Center
- This Institution's Policies and Procedures Manual
- This Institution's Consumer Information
- This Institution's School Catalog
- This Institution's Security Report
- This Institution's Advisory Committee Minutes
- State of AR Laws
- State of IL Laws
- Federal Drug Laws
- Office of Post-Secondary (OPE) Campus Safety and Security Statistics website/database
- DeJong, W., & Langford, L.M. (2002). A typology for campus-based alcohol prevention: moving toward environmental management strategies. *Journal of Studies on Alcohol/Supplement No. 14* (pp. 140-147).

- DeRicco, B. (Ed). (2006). *Complying With the Drug-Free Schools and Campuses Regulations [EDGAR Part 861: A Guide for University and College Administrators]*. Department of Education/Higher Education Center for Alcohol and Other Drug Abuse and Violence Prevention.
- Dimeff, L.A., Baer, J.S., Kivlaham, D.R. & Marlatt, G.A. (1999). *Brief alcohol screening and intervention for college students*. New York, NY. Guilford Press.
- Langford, L. & DeJong, W. (2008). *Strategic planning for prevention professionals on campus*. Washington, DC: U.S. Department of Education, Office of Safe and Drug-Free Schools, Higher Education Center for Alcohol and Other Drug Abuse and Violence Prevention.