



El Camino College

**Drug & Alcohol Abuse
PREVENTION
PROGRAM**



El Camino College

16007 Crenshaw Blvd. Torrance, CA 90506 | www.elcamino.edu | 310-660-3593

DRUG AND ALCOHOL ABUSE PREVENTION PROGRAM

The Drug-Free Schools and Communities Act Amendments of 1989 require that, as a condition of receiving funds or any other form of financial assistance under any Federal program, an institution of higher education must certify that it has adopted and implemented a drug and alcohol abuse prevention program. In response, the El Camino Community College District (the District) has adopted and implemented a program and policies to prevent the unlawful possession, use, or distribution of illicit drugs and alcohol by students and employees.

The El Camino Community College District is committed to providing a drug-free environment (El Camino College Board Policy 3550). The District also prohibits the use of tobacco products and electronic delivery services at all El Camino College facilities (El Camino College Board Policy 3570).

The District's program is as follows:

An annual notification will be sent out to all students and employees. The notification will include:

- 1) 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;
- 2) A description of the health risks associated with the use of illicit drugs and the abuse of alcohol;
- 3) A list of drug and alcohol programs (counseling, treatment, rehabilitation and re-entry) that are available to employees or students;
- 4) A description of applicable legal sanctions under federal, state, or local law for the unlawful possession or distribution of illicit drugs and alcohol; and
- 5) A clear statement that El Camino College will impose disciplinary 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.

In addition to the required notifications, El Camino College will display information or provide a link to the District's Drug and Alcohol Abuse Prevention Program for all students and employees to view as follows:

- College website
- Class schedules
- College catalogs
- Events/workshops/orientations
- Publications in select locations around campus

The El Camino Community College District is committed to providing an educational and employment environment in which no person is subjected to discrimination on the basis of actual or perceived race, color, ancestry, national origin, religion, creed, age (over 40), disability (mental or physical), sex, gender (including pregnancy and childbirth), sexual orientation, gender identity, gender expression, medical condition, genetic information, marital status, military and veteran status, or retaliation; or on any other basis as required by state and federal law.

STANDARDS OF CONDUCT

The following sections of the El Camino College Board Policy (BP) 3550 (Drug Free Environment and Drug Prevention Program) and Board Policy (BP)/Administrative Procedure (AP) 3560 (Alcoholic Beverages) pertain directly to drug and alcohol use, sale and possession:

- The District shall be free from the unlawful possession, use or distribution of illicit drugs and alcohol by students and employees (BP 3550).
- The unlawful manufacture, distribution, dispensing, possession or use of a controlled substance is prohibited in all facilities under the control and use of the District (BP 3550).
- The District does not permit the possession, use, or sale of marijuana for any purpose on District property even if the use meets the qualifications of the California Compassionate Use Act, Proposition 215, and/or the Adult Use of Marijuana Act, Proposition 64. Employees and/or students who qualify under Propositions 215 and 64 to use marijuana for medical and/or recreational purposes are not permitted to possess, store, provide, use, or be under the influence of marijuana while on District owned or controlled property (including, but not limited to, campus buildings, leased facilities, and parking lots,) or during a District-sanctioned activity or event regardless of the location (BP 3550).
- The campus has been designated “Drug free” and “Smoke free” and only under certain circumstances is the consumption of alcohol permitted. The possession, sale, manufacture or distribution of any controlled substance is illegal under both state and federal laws. Such laws are strictly enforced by the El Camino College Campus Police. Violators are subject to disciplinary action, criminal prosecution, fine and imprisonment (AP 3560).
- It is unlawful to sell, furnish or provide alcohol to a person under the age of 21. The possession of alcohol by anyone under 21 years of age in a public place or a place open to the public is illegal. It is also a violation of this policy for anyone to consume or possess alcohol in any public or private area of campus without prior District approval. Organizations or groups violating alcohol or

substance policies or laws may be subject to sanctions by the District (AP 3560).

- Alcoholic beverages shall not be served on campus except in accordance with procedures authorized by the Superintendent/President (BP 3560).

The District follows the laws and regulations of the federal government, the state of California, Los Angeles County, the City of Los Angeles and the City of Torrance as well as the counties and cities in which our outreach sites are located. Each student and employee is expected to do the same.

Any student or employee who violates these policies will be subject to disciplinary action (consistent with District policies; local, state, or federal law; and/or collective bargaining agreements), which may include, but are not limited to, referral to an appropriate rehabilitation program, expulsion or termination of employment, and referral for prosecution.

A full version of any of the above Board Policies/Administrative Procedures can be viewed at www.elcamino.edu/leadership/trustees/policies.aspx.

STUDENTS

In addition, the unlawful possession, use, sale, offer to sell, furnishing, or being under the influence of alcoholic beverages or an intoxicant of any kind, controlled substances, and/or possession of drug paraphernalia by any student on District-owned facilities or controlled property or at District-sponsored or supervised functions shall be strictly prohibited. This includes possession of alcoholic beverage containers.

No student shall be in an intoxicated condition, which may be evidenced by disorderly, obscene or indecent conduct or appearance, while on campus or at a college- or District-approved event off campus. No student shall furnish or cause to be furnished any alcoholic beverage to any person under the legal drinking age. California under-age drinking laws will be enforced through student disciplinary referrals and/or reporting incidents to the Campus Police Department.

The District will impose sanctions, consistent with local, state, and federal law, for violations of the District’s alcohol and drug policies and the Student Code of Conduct.

Sanctions may include, but are not limited to, written or verbal reprimands, educational sanctions, restitution, probation, removal from class/facility/District entity, withdrawal of consent to remain on campus, suspension or expulsion. Sanctions may also include classes, community service, referrals for appropriate counseling and/or referral to the Campus Police Department and or local law enforcement for prosecution.

For further information, please review Administrative Procedure 5500 (Standards of Student Conduct), and Administrative Procedure 5520 (Student Discipline Procedures) at: www.elcamino.edu/leadership/trustees/policies.aspx.

EMPLOYEES

The unlawful possession, purchase, manufacture, use, sale or distribution of illicit drugs and alcohol by employees on college/District property or at any of its activities is prohibited. The District will impose sanctions,

consistent with local, state, and federal law, for violations of the District's alcohol and drug policies as stated in board policies/administrative procedures and collective bargaining agreements. Disciplinary action may include, but are not limited, to verbal counseling, letters of reprimand, demotion, involuntary transfer/reassignment, suspension or dismissal and/or referral to local law enforcement for prosecution. Legal sanctions may include classes, community service, fines, prison terms, loss of driving privileges, and mandated rehabilitation programs. In addition, failure to disclose previous convictions on a job application is grounds for termination.

For further information please review Administrative Procedure 7800 (Discipline and Dismissal - Non Represented Classified Supervisors, Managers, and Directors) and Board Policy 7365 (Discipline and Dismissals Non-Represented Classified Employees) at: www.elcamino.edu/leadership/trustees/policies.aspx as well as applicable Collective Bargaining Agreements at www.elcamino.edu/departments/human-resources/agreements.aspx.

HEALTH RISKS

The health risks associated with the use of illicit drugs and the abuse of alcohol include:

- Death, including by alcohol poisoning or drug overdose;
- Risk of addiction and withdrawal symptoms, including pain, convulsions, and depression;
- Liver, heart, kidney, pancreas, and brain damage and/or loss of brain cells;
- Impaired judgment and resulting safety and health risks, including accidents, unwanted pregnancies or sexually transmitted diseases, and aggressive or violent behavior;
- Impaired performance, including drowsiness, impaired memory, and impaired concentration;
- Sexual dysfunctions;
- Harm to a fetus, including spontaneous abortions, premature labor, and detached placentas;
- Psychological problems, including depression, anxiety, paranoia, panic reactions, psychosis, and hallucinations;
- Seizures;
- Strokes, cardiac arrest or cardiovascular problems;
- Lung damage or illnesses, bronchitis, or respiratory arrest; and
- Needle-related illnesses and complications such as hepatitis, HIV, muscle and nervous-tissue death necessitating limb amputation, and infections.



DRUG AND ALCOHOL PROGRAMS AND RESOURCES

El Camino College provides information on drug and alcohol treatment and prevention through a variety of means, including seminars, courses, and Student Health Services.

Note: During the COVID-19 pandemic, these programs may be offered virtually.

On campus-based programs and resources for students include, but are not limited to, the following:

- 1) Crisis and psycho-social counseling from clinical psychologists
- 2) Referrals to community-based substance-abuse and treatment services
- 3) Substance abuse workshops
- 4) Annual substance abuse/health fairs
- 5) Printed resources on drug/alcohol topics in the Campus Police Department lobby

For more information on student-based programs, contact Student Health Services at 310-660-3643.

eCHECKUP TO GO - Personalized, Online Prevention Intervention

Student Health Services offers all El Camino College students the opportunity to complete eCHECKUP TO GO. This program will give students a chance to participate in an anonymous, personalized assessment about their goals, drinking habits, marijuana or tobacco use. Students can also learn about ways to identify, prevent and interrupt sexual violence. Feedback is confidential, though students can access resources through the online screening if they choose. To begin the course, please visit: www.elcamino.edu/support/health-safety/student-health-services/echeckup-to-go.aspx.

On-campus programs and resources open to the entire campus community include, but are not limited to, the following:

- 1) Classes via Community Education
- 2) Maxient Incident Report and Referral Form
- 3) Assessment, Intervention and Management of Safety (AIMS)
- 4) Printed resources on drug/alcohol topics in the Campus Police Department lobby



Available government programs and referrals include, but are not limited to, the following:

Substance-Abuse Treatment

Los Angeles County Substance Abuse Prevention and Control: publichealth.lacounty.gov/sapc/

Substance Abuse and Service Helpline: 844-804-7500

Online treatment services locator: sapccis.ph.lacounty.gov/sbat/

Substance Abuse and Mental Health Services Administration

Suicide Prevention: 800-273-TALK (8255)

24/7 Treatment Referral Line: 800-662-HELP (4357)

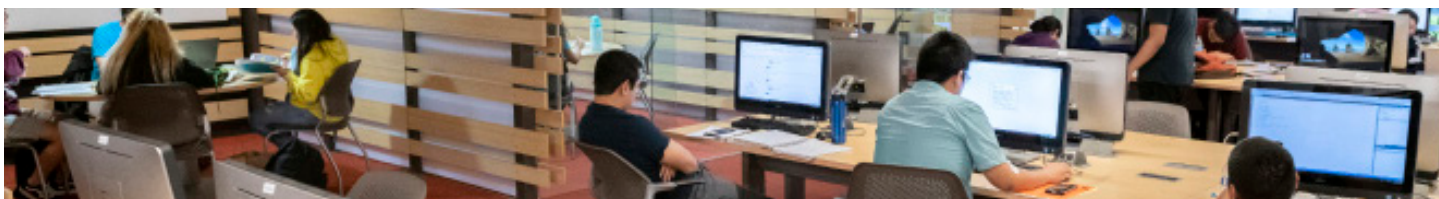
SAMHSA's National Helpline: 800-662-HELP (4357)

Online Treatment Services Locator: www.samhsa.gov/find-help and findtreatment.samhsa.gov/



Available community programs and referrals include, but are not limited to, the following:

- Alcoholics Anonymous
Service/Intake and Administration: 323-936-4343
24 hours Service/Intake and Hotline: 800-923-8722
Spanish Information Only: 323-750-2039
lacoaa.org
- Al-Anon Family Groups of Greater Los Angeles
818-760-7122
888-684-6444 (toll free)
www.alanonla.org
- Narcotics Anonymous
310-405-0348 x800
Regional Office: (English): 800-863-2962
Regional Office: (Spanish) 888-622-4672
www.na.org
- Alcohol and Drug Helpline (referrals)
800-821-4357
- LA County Department of Mental Health Help Line
800-854-7771
- Crisis Text Line (24/7 support and information)
Text the word COURAGE to 741741
- Community Helpline: Confidential Crisis & Support Hotline
877-541-2525
- Crisis Text Line (24/7 support and information)
Text the word COURAGE to 741741
- Suicide Prevention Lifeline
800-273-8255
- 211LA is the central source for providing information and referrals for all health and human services in LA County such as food, housing, smoking cessation, mental health, short term financial assistance, etc.
www.211LA.Org or Dial “2-1-1”
800-339-6993
- www.1degree.org helps low-income families access the resources they need to achieve social and economic mobility such as food, housing, drug addiction, smoking cessation, mental health, short-term financial assistance, etc.
- Employee Assistance Services for Education (EASE)
800-882-1341



The following locations provide substance-abuse treatment and sober-living services:

California Hispanic Commission Alcohol & Drug Abuse

11046 Valley Mall
El Monte, CA 91731
626-444-9000

www.chcada.org

Glendale Adventist Medical Center – Alcohol & Drug Center

335 Mission Rd.
Glendale, CA 91205
818-242-3116

www.adventisthealth.org

House of Hope

235 W 9th St.
San Pedro, CA 90731
310-521-9209

www.houseofhopesp.org

Latino Family Alcohol & Drug

5801 E. Beverly Blvd.
Montebello, CA 90640
323-722-4529

Little House Recovery Home

9718 Harvard St.
Bellflower, CA 90706
562-925-2777

www.littlehouseinc.org

New Found Life

2211 E Ocean Blvd.
Long Beach, CA 90803
562-434-4060

www.newfoundlife.com

NLH Sober Living

Open 24 hours
17252 Hawthorne Blvd., #489
Torrance, CA 90504
888-357-7577

www.newlifehouse.com

Pathways Venice Beach

Venice Beach, CA 90291
424-241-6686

Sarah Marie House

21517 Halldale Ave.
Torrance, CA 90501
310-699-4750

South Bay Sober Living

Open 24 Hours
3625 W 190th St. A
Torrance, CA 90504
844-316-2809

www.southbaysoberliving.com

The Gilmore House

Open 24 hours
12322 Gilmore Ave.
Los Angeles, CA 90066
310-435-7370

www.gilmorehousesoberliving.com

Thelma McMillen Center for Alcohol & Drug Treatment

3333 Skypark Dr.
Torrance, CA 90505
310-784-4879

www.torrancememorial.org

Roots Through Recovery

Open 24 hours
3939 Atlantic Ave., Ste. 102
Long Beach, CA 90066
562-473-0827

www.roots-recovery.com

Student Support Services' Free and Low Cost Resources Guide publication contains additional information on free or low-cost services (ie. food banks, emergency shelters/ transitional housing, legal help, etc.). The publication can be found online at: www.elcamino.edu/support/resources/basics/index.aspx

LEGAL SANCTIONS

FEDERAL

The Federal Trafficking Penalties table obtained from the United States Drug Enforcement Administration website (www.dea.gov/drug-information/drug-policy) is provided below:

FEDERAL TRAFFICKING PENALTIES

DRUG/SCHEDULE	QUANTITY	PENALTIES	QUANTITY	PENALTIES
Cocaine (Schedule II)	500-4999 grams mixture	First Offense: Not less than 5 yrs, and not more than 40 yrs. If death or serious injury, not less than 20 or more than life. Fine of not more than \$5 million if an individual, \$25 million if not an individual. Second Offense: Not less than 10 yrs, and not more than life. If death or serious injury, life imprisonment. Fine of not more than \$8 million if an individual, \$50 million if not an individual.	5 kgs or more mixture	First Offense: Not less than 10 yrs, and not more than life. If death or serious injury, not less than 20 or more than life. Fine of not more than \$10 million if an individual, \$50 million if not an individual. Second Offense: Not less than 20 yrs, and not more than life. If death or serious injury, life imprisonment. Fine of not more than \$20 million if an individual, \$75 million if not an individual. 2 or More Prior Offenses: Life imprisonment. Fine of not more than \$20 million if an individual, \$75 million if not an individual.
Cocaine Base (Schedule II)	28-279 grams mixture		280 grams or more mixture	
Fentanyl (Schedule II)	40-399 grams mixture		400 grams or more mixture	
Fentanyl Analogue (Schedule I)	10-99 grams mixture		100 grams or more mixture	
Heroin (Schedule I)	100-999 grams mixture		1 kg or more mixture	
LSD (Schedule I)	1-9 grams mixture		10 grams or more mixture	
Methamphetamine (Schedule II)	5-49 grams pure or 50-499 grams mixture		50 grams or more pure or 500 grams or more mixture	
PCP (Schedule II)	10-99 grams pure or 100-999 grams mixture		100 gm or more pure or 1kg or more mixture	

PENALTIES

Other Schedule I & II drugs (and any drug product containing Gamma Hydroxybutyric Acid)	Any amount	First Offense: Not more than 20 yrs. If death or serious injury, not less than 20 yrs, or more than life. Fine \$1 million if an individual, \$5 million if not an individual.
Flunitrazepam (Schedule IV)	1 gram	Second Offense: Not more than 30 yrs. If death or serious bodily injury, life imprisonment. Fine \$2 million if an individual, \$10 million if not an individual.
Other Schedule III drugs	Any amount	First Offense: Not more than 10 yrs. If death or serious injury, not more than 15 yrs. Fine not more than \$500,000 if an individual, \$2.5 million if not an individual. Second Offense: Not more than 20 yrs. If death or serious injury, not more than 30 years. Fine not more than \$1 million if an individual, \$5 million if not an individual.
All other Schedule IV drugs	Any amount	First Offense: Not more than 5 years. Fine not more than \$250,000 if an individual, \$1 million if not an individual.
Flunitrazepam (Schedule IV)	Other than 1 gram or more	Second Offense: Not more than 10 years. Fine not more than \$500,000 if an individual, \$2 million if other than an individual.
All Schedule V drugs	Any amount	First Offense: Not more than 1 yr. Fine not more than \$100,000 if an individual, \$250,000 if not an individual. Second Offense: Not more than 4 yrs. Fine not more than \$200,000 if an individual, \$500,000 if not an individual.

FEDERAL TRAFFICKING PENALTIES - MARIJUANA

DRUG	QUANTITY	1ST OFFENSE	2ND OFFENSE*
Marijuana (Schedule I)	1,000 kg or more marijuana mixture; or 1,000 or more marijuana plants	Not less than 10 yrs. or more than life. If death or serious bodily injury, not less than 20 yrs., or more than life. Fine not more than \$10 million if an individual, \$50 million if other than an individual.	Not less than 20 yrs. or more than life. If death or serious bodily injury, life imprisonment. Fine not more than \$20 million if an individual, \$75 million if other than an individual.
Marijuana (Schedule I)	100 kg to 999 kg marijuana mixture; or 100 to 999 marijuana plants	Not less than 5 yrs. or more than 40 yrs. If death or serious bodily injury, not less than 20 yrs. or more than life. Fine not more than \$5 million if an individual, \$25 million if other than an individual.	Not less than 10 yrs or more than life. If death or serious bodily injury, life imprisonment. Fine not more than \$20 million if an individual, \$75 million if other than an individual.
Marijuana (Schedule I)	More than 10 kgs hashish; 50 to 99 kg marijuana mixture More than 1 kg of hashish oil; 50 to 99 marijuana plants	Not more than 20 yrs. If death or serious bodily injury, not less than 20 yrs. or more than life. Fine \$1 million if an individual, \$5 million if other than an individual.	Not more than 30 yrs. If death or serious bodily injury, life imprisonment. Fine \$2 million if an individual, \$10 million if other than an individual.
Marijuana (Schedule I)	Less than 50 kilograms marijuana (but does not include 50 or more marijuana plants regardless of weight) 1 to 49 marijuana plants;	Not more than 5 yrs. Fine not more than \$250,000, \$1 million if other than an individual.	Not more than 10 yrs. Fine \$500,000 if an individual, \$2 million if other than an individual.
Hashish (Schedule I)	10 kg or less		
Hashish Oil (Schedule I)	1 kg or less		

* The minimum sentence for a violation after two or more prior convictions for a felony drug offense have become final is a mandatory term of life imprisonment without release and a fine up to \$20 million if an individual and \$75 million if other than an individual.

STATE

The State of California has numerous laws regulating the possession and use of controlled substances and alcohol. As an example, under current California state law, “a person shall not knowingly or intentionally possess or distribute a controlled substance.” If an individual is found guilty of a violation of the state law, they may be subject to large fines and imprisonment. California Health and Safety Code Section 11350-11356.5

Violations of the law may subject the individual to fines, participation in a substance abuse program, imprisonment, community service hours, and/or out of pocket expenses related to required substance abuse screenings. Business and Professions Code 25662 BP/Vehicle Code 13202.5 VC. The State of California laws can be found at leginfo.ca.gov/faces/codes.xhtml.

LOCAL

Los Angeles County and the City of Torrance have established ordinances/municipal codes which include but are not limited to: consumption of alcohol in public places, possession and use of alcohol by minors, and all substance abuse laws. Sanctions for the violation of these ordinances can range from fines, to probation, rehabilitation, and or imprisonment. The full version of the ordinances/municipal codes can be viewed at https://library.municode.com/ca/los_angeles_county/codes/code_of_ordinances and www.torranceca.gov/government/torrance-municipal-code.

CONSEQUENCES FOR VIOLATIONS

STUDENTS

In accordance with Administrative Procedure 5520 (Student Discipline Procedures), possible disciplinary sanctions for violation of drug-and alcohol-abuse policies include but are not limited to:

1. Written or Verbal Reprimand - An admonition to the student to cease and desist from conduct determined to violate the Standards of Student Conduct.

2. Educational Sanctions - An educational sanction may include additional work assignments, essays, community service, behavioral contract, administrative referral, or other related educational assignment.

3. Probation - A reprimand for violation of specified regulations. Probation is for a designated period of time and includes the probability of more severe disciplinary sanctions if the student is found to be in violation of any Standards of Student Code during the probationary period. It may include restriction from contact with specified individuals, college activities, services, offices, or designated areas.

4. Restitution - A payment to compensate an injured party for financial harm in cases involving misconduct including, but not limited to, theft, destruction of property, or deception.

5. Removal from Class/Facility/College District Entity - Any instructor or division administrator or designee may remove a student from the class, activity, office, department, or other educational forum for the day of the incident or the day the infraction was discovered, whichever is later, and one additional instructional day.

6. Withdrawal of Consent to Remain On-Campus - The District's Campus Police Department, may notify any person for whom there is a reasonable belief that the person has willfully disrupted the orderly operation of the campus, that consent to remain on campus has been withdrawn.

a. Any person as to whom consent to remain on campus

has been withdrawn who knowingly re-enters the campus during the period in which consent has been withdrawn, except to come for a meeting or hearing, is subject to arrest (Penal Code Section 626.4).

7. No Contact Order - An issuance that there should be no personal or interpersonal contact or communication between involved parties. This includes verbal and non-verbal communication.

8. Short-Term Suspension - Exclusion of the student by the director of student development or designee for good cause from one or more classes and/or from all activities of the District for a period of up to 10 consecutive days of instruction.

9. Long-Term Suspension - Exclusion of the student by the director of student development or designee for good cause from one or more classes for the remainder of the school term and/or from all classes and activities of the District for the remainder of the current term with a maximum of two academic years.

Students who receive long-term suspensions are permitted on campus to conduct student business, but must receive permission from the director of student development or designee prior to coming to campus and must check in with the Campus Police Department to obtain a police escort while on-campus.

10. Immediate Interim Suspension (Education Code Section 66017) - The director of student development or designee may order immediate interim suspension of a student if they conclude the actions are necessary because of any of the following:

a. That the student poses a threat to the safety and/or well-being of members of the District community or preservation of District property:

b. That the student poses a threat to the student's own physical or emotional safety and well-being.

c. That the student poses an immediate threat, disruption of, or interference with the normal operations of the District.

d. That the student has been accused of a severe violation, including academic dishonesty, and cannot be located and/or does not participate in the conduct process.

11. Expulsion -The permanent separation of a student from El Camino College by action of the Board of

Trustees for good cause when other means of correction fail to bring about appropriate conduct, or when the presence of the student causes a continuing danger to the safety of others. The student is prohibited from District property, functions, events, and activities.

EMPLOYEES

Possible disciplinary sanctions for violation of drug-and alcohol-abuse policies would be administrated consistent with applicable Collective Bargaining Agreements, Administrative Procedure 7800 (Discipline and Dismissal - Non Represented Classified Supervisors, Managers, and Directors) or Board Policy 7365 (Discipline and Dismissals Non-Represented Classified Employees) which may include but are not limited to:

1. Verbal counseling with written confirmation - A meeting with the employee to discuss matters related to the act or omission;
2. Letter of reprimand - A written letter of reprimand to be placed in the employee's personnel file noting the reason(s) for reprimand and providing suggestions for improvement;

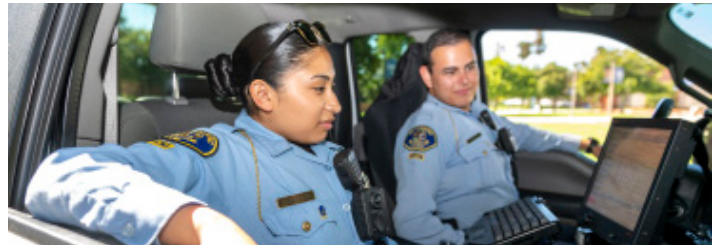
3. Demotion - Removal of an employee from the employee's present classification and reclassification to a lower pay range;

4. Involuntary transfer/reassignment - Transfer of an employee to another classification in the same pay range; transfer to another division, department or work station; or assignment to a different supervisor where such action is taken for disciplinary causes;

5. Suspension with or without pay - Temporary removal of an employee from the employee's position or the employee's removal preliminary to investigation of charges pending dismissal and hearing; and

6. Dismissal - Separation, discharge and permanent removal as a District employee.

In addition to campus disciplinary sanctions, students and employees are subject to legal sanctions under state, federal and local laws, and violators will be subject to arrest by the Campus Police Department and subsequent referral for prosecution.



NOTIFICATION OF THE DRUG AND ALCOHOL ABUSE PREVENTION PROGRAM

The District will distribute information about the Drug and Alcohol Abuse Prevention Program to students and employees as follows:

STUDENTS

Information contained in the Drug and Alcohol Abuse Prevention Programs is distributed to all current students during each term via college email.

EMPLOYEES

Information contained in the Drug and Alcohol Abuse Prevention Programs is distributed to all current employees via college email on an annual basis.



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