

## **DRUG FREE CAMPUS POLICY**

### **PURPOSE AND SCOPE OF THE POLICY**

The Drug-Free Schools and Communities Act and accompanying federal regulations 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 program to prevent the unlawful possession, use, or distribution of illicit drugs and alcohol by students and employees.

Keck Graduate Institute ("KGI" or "Institute") is committed to providing a safe, healthy and productive work environment. Consistent with this commitment, and its obligations under applicable law, this policy establishes the Institute's intent to maintain a drug and alcohol-free work environment. This policy applies to all students and employees of KGI. This policy is part of KGI's overall Drug and Alcohol Abuse Prevention Program ("DAAPP") and is distributed annually to all students and employees.

### **PROHIBITIONS**

KGI prohibits the unlawful manufacture, possession, distribution, purchase, or use of drugs (including marijuana)<sup>1</sup> or alcohol by students or employees on its property or as part of its activities. In addition, employees and students shall not report for work or work under the influence of any drug or alcohol or other substance which will impair work performance, alertness, coordination or response, or affect the safety of others. Nothing in this policy is meant to prohibit the appropriate use of over-the-counter medication or legally prescribed medication.

### **ALCOHOL AND EVENT PLANNING GUIDELINES**

Where alcohol is to be served at an Institute function, the department or group hosting the event is responsible for ensuring that it is offered in a safe and legal manner.

An individual or group sponsoring an event where alcoholic beverages are made available must adhere to all applicable laws (e.g., securing a license to sell and/or serve). The sponsor will be held responsible for any legal violations.

Ample non-alcoholic beverages and food must be provided at events where alcohol is served.

Any individual or group intending to serve alcoholic beverages must register the event with the appropriate office or department and follow the rules set by that office or department.

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<sup>1</sup> KGI does not permit the use of marijuana for any purpose on its property or as part of its activities even if the use is otherwise permissible under California law.

Amendment Date: September 26, 2025

Administrator: Human Resources

Approval Authority: Cabinet

Students or employees who choose to consume alcohol at such events must do so responsibly and must conduct themselves properly and professionally at all times. Students and employees are also required to abide by all state and federal laws related to alcoholic beverages, including laws which prohibit the operation of vehicles while under the influence.

Questions about student events should be directed to the Division of Student Affairs at [student\\_affairs@kgi.edu](mailto:student_affairs@kgi.edu).

Questions about employee events should be directed to [HR@kgi.edu](mailto:HR@kgi.edu)

## **Licensure Implications**

Drug convictions may disqualify employees or students from obtaining professional licenses, such as those required for pharmacists or physician assistants. Employees or students unable to secure any necessary license may face termination from employment or their respective program.

## **EMPLOYEE REPORTING OBLIGATIONS**

In accordance with the Drug-Free Workplace Act of 1988, any employee who is convicted (including a plea of no contest) of a criminal drug statute violation occurring in the workplace must, within five days after the conviction, notify KGI of their conviction by informing the Assistant Vice President and Chief Human Resources Officer, the Provost, or the President. If required, appropriate government agencies will be notified within ten days after KGI has been informed of a conviction.

## **HEALTH RISKS ASSOCIATED WITH THE ABUSE OF ALCOHOL AND OTHER DRUGS**

The consumption of drugs and alcohol can have significant negative effects on health.

Alcohol consumption causes a number of marked changes in behavior. Even low doses significantly impair judgment and the ability to operate a vehicle safely, increasing the likelihood of an accident. High doses of alcohol may cause respiratory depression and death. Repeated use of alcohol can lead to dependence and cause serious damage to the nervous and circulatory systems, mental disorders, and other health problems.

Drugs and alcohol are chemicals, and any chemical is potentially harmful. Drugs by their very nature cause reactions in the body. Possible effects from non-therapeutic drug use include convulsions, memory loss, psychosis, anxiety, delusions, hallucinations, and even death. All drugs are toxic and poisonous when abused. Health risks of drug abuse include sleep disorders, confusion, hallucinations, paranoia, depression, malnutrition, liver and kidney damage, cardiac irregularities, hepatitis, and neurological damage. HIV infection associated

with intravenous drug use is a prevalent hazard.

Drug or alcohol use during pregnancy may result in fetal damage and birth defects causing hyperactivity, neurological abnormalities, developmental difficulties, and health problems, such as fetal alcohol syndrome.

## **LOCAL, STATE AND FEDERAL LEGAL SANCTIONS**

Local, state and federal laws establish severe penalties for unlawful possession or distribution of drugs and alcohol. These sanctions, upon conviction, may range from a fine to life imprisonment. In the case of possession and distribution of illegal drugs, these sanctions could include seizure and summary forfeiture of property, including vehicles. It is especially important to know that federal penalties for illegally distributing drugs include life imprisonment and fines in excess of \$1,000,000.00.

The following is a brief summary of some of the state and federal criminal sanctions that may be imposed upon someone who violates state and federal drug and alcohol laws:

- A violation of California law regarding the unlawful sale of alcohol may include imprisonment in the county jail for six months, plus fines and penalties.
- A violation of California law regarding the possession, use, or sale of narcotics, marijuana, or other illicit drugs includes imprisonment in the county jail or state prison for one to nine years, plus fines up to \$100,000.00 for each count.
- A violation of federal law regarding the possession, use, or sale of narcotics, marijuana, or other illicit drugs may include imprisonment in a federal penitentiary for one to fifteen years, plus substantial financial penalties.
- A violation of law involving an individual being under the influence of a combination of alcohol and other drugs (itself potentially deadly) may result in an increase in criminal sanctions and penalties.

## **AVAILABLE RESOURCE, EDUCATION AND ASSISTANCE**

KGI recognizes drug and alcohol abuse as treatable conditions. Employees who are concerned about problems related to substance use, abuse, and rehabilitation should be aware that The Claremont Colleges sponsor and present seminars and workshops on these topics for all members of the college community. Other programs are available through the health insurance plans and the Employee Assistance Program ("EAP") of The Claremont Colleges.

The EAP provides confidential counseling and other support services to qualified employees

and their dependents for substance abuse, as well as personal or emotional concerns. Information disclosed through the EAP will be treated as confidential, in accordance with applicable federal and state laws. The Institute will not use an employee's participation in an EAP program as a basis for corrective action. An employee may also request a leave of absence to obtain treatment for substance abuse, with documentation from a licensed health care provider providing that such treatment is required and undertaken. Such leave is subject to applicable KGI personnel policies.

The Human Resources Department can also provide referral services for confidential, professional counseling, providing a constructive way for employees to treat drug, alcohol, or other problems. Students should seek assistance for similar problems through the Division of Student Affairs.

For Students: KGI offers confidential counseling and referrals through the Division of Student Affairs. Students are encouraged to seek assistance for themselves or others struggling with substance abuse. KGI also offers educational outreach and prevention programs for students, which may include awareness events, counseling, peer-led initiatives, and harm reduction strategies. These efforts are designed to educate the community and reduce the incidence of substance misuse.

## **ACCOUNTABILITY**

The success of this policy will depend on the thoughtfulness, consideration, and cooperation of all members of the KGI community. All students, faculty, and staff share in the responsibility for adhering to and enforcing this policy. Refusal by students, faculty, or staff to comply with this policy may result in appropriate disciplinary action.

Disciplinary action may include termination from employment, dismissal from the academic program, and referral for prosecution of the most serious violations of law and this policy. For example, an employee or student found to be selling illegal drugs will be subject to discipline up to and including discharge from employment or dismissal. Disciplinary action may be invoked entirely apart from any civil or criminal penalties that may apply to the employee or student.

## **POLICY DISTRIBUTION**

In compliance with federal law, the Institute will distribute this policy and information on its prevention program to all students and employees annually via electronic communication and publication on its website.

All employees, including student employees, are expected to acknowledge receipt of the policy and participate in required training, as applicable.



## **BIENNIAL REVIEW AND COMPLIANCE**

To ensure compliance with the Drug-Free Schools and Campuses Act, KGI will conduct a biennial review of its drug and alcohol prevention program. This review will:

- Evaluate the effectiveness of the program and recommend necessary changes
- Determine the number of drug- and alcohol-related violations and fatalities that occur on campus or as part of KGI activities
- Assess the number and types of sanctions imposed
- Ensure consistent enforcement of disciplinary sanctions

The results of this review will be documented and made available to the U.S. Department of Education or other appropriate authorities upon request.

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**Student/Employee's Name (Print)**

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**Student/Employee's Signature**

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**Date**