



July 8, 2014

Ms. Geeta A. Brown, President
InterCoast Colleges
9846 White Oak Avenue, Suite 100
Northridge, CA 91325

Certified Mail
Return Receipt Requested
#: 70070710000106754892

RE: **Final Program Review Determination**
OPE ID: 02559400
PRCN: 201230927929

Dear Ms. Brown:

The U.S. Department of Education's (Department's) San Francisco/Seattle School Participation Division (Division) issued a program review report on August 29, 2012 covering InterCoast Colleges' (InterCoast's) administration of programs authorized pursuant to Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 *et seq.* (Title IV, HEA programs), for the 2010-2011 and 2011-2012 award years. InterCoast's final response was received on September 28, 2012. A copy of the program review report and InterCoast's response are attached. Any supporting documentation submitted with the response is being retained by the Department and is available for inspection by InterCoast upon request. Additionally, this Final Program Review Determination (FPRD) and any supporting documentation may be subject to release under the Freedom of Information Act (FOIA), and can be provided to other oversight entities after this FPRD is issued.

Purpose:

A final determination has been made concerning the outstanding finding of the program review report. The purpose of this letter is to: (1) close the review and (2) notify InterCoast of a possible adverse action. Due to the serious nature of one or more of the enclosed findings, this FPRD is being referred to the Department's Administrative Actions and Appeals Service Group (AAASG) for its consideration of possible adverse action. Such action may include a fine, or the limitation, suspension or termination of the eligibility of the institution. Such action may also include the revocation of the institution's program participation agreement (if provisional), or, if the institution has an application pending for renewal of its certification, denial of that application. If AAASG initiates any action, a separate notification will be provided which will include information on institutional appeal rights and procedures to file an appeal.

This FPRD contains one or more findings regarding InterCoast's failure to comply with the requirements of the Drug-Free Schools and Communities Act (DFSCA) and Part 86 of the Department's General Administrative Regulations. Because this DFSCA finding will not result

in the assessment of financial liabilities, such a finding may not be appealed. If an adverse administrative action is initiated, additional information about InterCoast's appeal rights will be provided under separate cover.

Record Retention:

Program records relating to the period covered by this program review must be retained until the later of: the resolution of the loans, claims or expenditures questioned in the program review; or the end of the retention period otherwise applicable to the record under 34 C.F.R. § 668.24(e).

The Department expresses its appreciation for the courtesy and cooperation extended during the review. If the institution has any questions regarding this letter, please contact DeNise L. McMillian at (206) 615-3638 or Kimberly Wu at (415) 486-5619.

Sincerely,

(b)(6)

Martina Fernandez-Rosario
Division Director
San Francisco/Seattle School Participation Division

cc: Ms. AnnaMarie Lopez, Financial Aid Administrator
California Bureau for Private Postsecondary Education
Accrediting Council for Continuing Education & Training

Enclosures:

Final Program Review Determination
Program Review Report
InterCoast's Response to the Program Review Report

Prepared for
InterCoast Colleges

OPE ID 02559400
PRCN 201230927929

Prepared by
U.S. Department of Education
Federal Student Aid
San Francisco/Seattle School Participation Division

Final Program Review Determination
July 8, 2014

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A. Institutional Information

InterCoast Colleges
8550 Balboa Boulevard
Northridge, CA 91325

Type: Proprietary

Highest Level of Offering: Non-Degree 1 year (900 – 1799 hours)

Accrediting Agency: Accrediting Council for Continuing Education & Training

Current Student Enrollment: 1,484 for 2011-12

% of Students Receiving Title IV: 88% for 2011-12

Title IV Participation per U.S. Department of Education Records:

	<u>2010-2011</u>
Federal Pell Grant (FPell) Program	\$ 9,349,394
Federal Family Education Subsidized Loan	\$ 658,510
Federal Family Education Unsubsidized Loan	\$ 1,061,410
Federal Family Education PLUS	\$ 33,129
Federal Direct Subsidized Loan	\$ 5,329,778
Federal Direct Unsubsidized Loan	\$ 8,097,714
Federal Direct PLUS	\$ 579,122
Federal Supplemental Educational Opportunity Grant (FSEOG)	\$ 289,016
Federal Work Study	\$ 15,698

Default Rate FFEL/DL:	2009 – 21.5%
	2008 – 16.4%
	2007 – 12.8%
	2006 – 18.7%
	2005 – 17.8%
	2004 – 14.7%
	2003 – 15.4%

B. Scope of Review

The U.S. Department of Education (the Department) conducted a general assessment program review at InterCoast Colleges (InterCoast) from June 11, 2012 to June 15, 2012. The review was conducted by DeNise Hill and Kimberly Wu.

The focus of the review was to determine InterCoast's compliance with the statutes and federal regulations as they pertain to the institution's administration of Title IV programs. The review consisted of, but was not limited to, an examination of InterCoast's policies and procedures regarding institutional and student eligibility, individual student financial aid and academic files, attendance records, student account ledgers, and fiscal records.

A sample of 30 files was identified for review from the 2010-2011 and 2011-2012 (year to date) award years. The files were selected from a statistical sample of the total population receiving Title IV, HEA program funds for each award year. Appendix A lists the names of the students whose files were examined during the program review. The program review report (PRR) was issued on August 29, 2012.

Disclaimer:

Although the review was thorough, it cannot be assumed to be all-inclusive. The absence of statements in the report concerning InterCoast's specific practices and procedures must not be construed as acceptance, approval, or endorsement of those specific practices and procedures. Furthermore, it does not relieve InterCoast of its obligation to comply with all of the statutory or regulatory provisions governing the Title IV, HEA programs.

C. Finding with Final Determination

The program review report finding requiring further action is summarized below. At the conclusion of the finding is a summary of InterCoast's response to the finding, and the Department's final determination for that finding. A copy of the Program Review Report issued on August 29, 2012 is attached.

Finding 1: Failure to Conduct a Biennial Review of the Effectiveness of the Institution's Drug and Alcohol Policy

Citation: Per 34 C.F.R. § 86.100, an Institution of Higher Education's (IHE's) drug prevention program must include (b) a biennial review by the IHE of its program to (1) determine its effectiveness and implement changes to the program if they are needed; and (2) ensure that any disciplinary sanctions are consistently enforced.

Noncompliance: A review of InterCoast's drug abuse prevention program revealed that InterCoast failed to conduct a biennial review to determine the effectiveness of its drug abuse prevention program.

The effectiveness of a school's drug abuse prevention program may be measured by tracking:

- *the number of drug and alcohol-related disciplinary actions;*
- *the number of drug and alcohol-related treatment referrals;*
- *the number of drug and alcohol-related incidents recorded by campus police or other law enforcement officials;*
- *the number of drug and alcohol-related incidents of vandalism;*
- *the number of students or employees attending self-help or other counseling groups related to alcohol or drug abuse; and*
- *student, faculty, and employee attitudes and perceptions about the drug and alcohol problem on campus.*

The school is also required to review information provided to employees and students every two years to ensure compliance.

Required Action: *Although InterCoast has taken some corrective actions to resolve this finding, InterCoast must establish written and clear procedures that provide for the process of conducting biennial reviews for the upcoming years.*

A copy of these written procedures must be provided for the Department's examination to ensure that InterCoast complies with the requirements described in the citation above. If applicable, additional supporting documentation may be included in response to this Program Review Report.

InterCoast's Response:

In its response, InterCoast concurred with the finding and stated that the College "had taken some corrective action to resolve the finding." InterCoast further asserted that the College established a review committee in June 2012 and that the group conducted a biennial review of InterCoast's existing drug and alcohol abuse prevention program (DAAPP) and established a plan and processes for conducting future biennial annual reviews on the mandated schedule. The review committee produced a biennial review report and concluded that InterCoast's existing DAAPP program and policies were "believed to be in compliance" with the *DFSCA* regulations.

In the report, InterCoast also made a commitment to develop student alcohol and drug use surveys for each of its campuses and to provide a link for "Self-Care Information" about student health issues on its website by September 2012. The review committee also recommended that DAAPP materials be distributed to attendees of all Professional Development classes and included in the packets distributed to attendees of admissions and employee orientation programs. Further, the committee determined that program materials (annual disclosure) would also be distributed each October. Finally, InterCoast asserted that the findings and recommendations identified in the biennial review report

were “intended to provide additional support and continuous improvement” for the existing DAAPP.

In support of its claims, InterCoast provided the Department with the following documents: 1) minutes from the biennial review meeting; 2) the College’s Policy and Procedures Manual, 3) The Student Consumer Information guide; 4) 2012 Annual Campus Crime Report; 5) 2011-12 Student Consumer Handbook; and, 6) the College’s initial biennial review report.

Final Determination:

Finding #1 of the program review report cited InterCoast for its failure to conduct biennial reviews to evaluate the effectiveness of its drug and alcohol abuse prevention program as required by the *DFSCA* and Part 86 of the Department’s General Administrative Regulations.

As a result of this violation, the Department required InterCoast to develop clear, written procedures for conducting biennial reviews going forward. In addition, the College was required to conduct a review, produce a report of findings, and submit the report and its newly-developed procedures to the Department for review. In its response, InterCoast concurred with the finding and represented that remedial actions were taken and that additional improvements are planned for the future.

The Department carefully examined InterCoast’s narrative response and supporting documentation. Based on that review and the College’s admission of noncompliance, the violations identified in the finding are sustained. The Department has also determined that the College’s action plan meets minimum requirements. For these reasons, the Department has accepted InterCoast’s response and considers this finding to be closed.

Notwithstanding the Department’s acceptance of the response, InterCoast officials are reminded that they must initiate all necessary corrective actions to ensure that the deficiencies identified in this finding do not recur. To that end, InterCoast is reminded of its obligation to conduct comprehensive biennial reviews and to prepare substantive reports of findings and recommendations going forward. InterCoast is advised that its next report must contain substantially more information about the actual conduct of the review. Moreover, the findings and recommendations must be supported by valid data about the DAAPP’s effectiveness, as contemplated in the College’s initial report.

InterCoast is specifically reminded that the exceptions identified above constitute serious and persistent violations of the *DFSCA* that by their nature cannot be cured. There is no way to truly “correct” violations of this type once they occur. InterCoast asserted that it has taken adequate remedial actions and by doing so, has taken initial steps to finally comply with the *DFSCA* as required by its PPA. Notwithstanding these efforts, InterCoast officials must understand that compliance with the *DFSCA* is essential to

maintaining a safe and healthy learning environment, especially in light of the fact that data compiled by the Department shows that the use of illicit drugs and alcohol abuse is highly correlated to increased incidents of violent crime on campus. InterCoast's failure to conduct comprehensive biennial reviews of any drug and alcohol programs that were in place during and prior to the review period. For these reasons, InterCoast is advised that any remedial measures, whether already completed or planned for the future, cannot and do not diminish the seriousness of these violations nor do they eliminate the possibility that the Department will impose an adverse administrative action and/or require additional corrective measures as a result.

In light of the serious consequences associated with compliance failures of this type, the Department strongly recommends that InterCoast re-examine its drug and alcohol policies, procedures, and programs on at least an annual basis and revise them as needed to ensure that they continue to reflect current institutional policy and are in full compliance with the *DFSCA*. Please be advised that the Department may request information on a periodic basis to test the effectiveness of the College's new policies and procedures.

Appendix A: Student Sample

2010-2011

Student #	Student's Name	Student's SSN
1	(b)(6)	
2		
3		
4		
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		

2011-2012

Student #	Student's Name	Student's SSN
16	(b)(6)	
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		
29		
30		

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PRCN: 201230927929
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Appendix B
Program Review Report



August 29, 2012

Ms. Geeta A. Brown, President
InterCoast Colleges
8550 Balboa Boulevard
Northridge, CA 91325

Certified Mail
Return Receipt Requested
#: 7003 1680 0005 1119 6110

RE: **Program Review Report**
OPE ID: 02559400
PRCN: 201230927929

Dear Ms. Brown:

From June 11, 2012 through June 15, 2012, DeNise Hill and Kimberly Wu conducted a review of InterCoast Colleges' (InterCoast's) administration of the programs authorized pursuant to Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 et seq. (Title IV, HEA programs). The finding of that review is presented in the enclosed report.

The finding of noncompliance is referenced to the applicable statutes and regulations and specifies the action required to comply with the statute and regulations. Please review the report and respond to the finding, indicating the corrective actions taken by InterCoast. The response should include a brief, written narrative for the finding that clearly states InterCoast's position regarding the finding and the corrective action taken to resolve the finding. Separate from the written narrative, InterCoast must provide supporting documentation as required in this finding.

Please note that pursuant to HEA section 498A(b), the Department is required to:

- (1) provide to the institution an adequate opportunity to review and respond to any preliminary program review report¹ and relevant materials related to the report before any final program review report is issued;
- (2) review and take into consideration an institution's response in any final program review report or audit determination, and include in the report or determination –
 - a. A written statement addressing the institution's response;
 - b. A written statement of the basis for such report or determination; and
 - c. A copy of the institution's response.

The Department considers the institution's response to be the written narrative (to include e-mail communication). Any supporting documentation submitted with the institution's written response will not be attached to the FPRD. However, it will be retained and available for

¹ A "preliminary" program review report is the program review report. The Department's final program review report is the Final Program Review Determination (FPRD).

inspection by InterCoast upon request. Copies of the program review report, the institution's response, and any supporting documentation may be subject to release under the Freedom of Information Act (FOIA) and can be provided to other oversight entities after the FPRD is issued.

The institution's response should be sent directly to Kimberly Wu of this office within 30 calendar days of receipt of this letter.

Protection of Personally Identifiable Information (PII):

PII is any information about an individual which can be used to distinguish or trace an individual's identity (some examples are name, social security number, date and place of birth). The loss of PII can result in substantial harm, embarrassment, and inconvenience to individuals and may lead to identity theft or other fraudulent use of the information. To protect PII, the findings in the attached report do not contain any student PII. Instead, each finding references students only by a student number created by Federal Student Aid. The student numbers were assigned in Appendix A, Student Sample. Please see the enclosure Protection of Personally Identifiable Information for instructions regarding submission to the Department of required data/documents containing PII.

Record Retention:

Program records relating to the period covered by the program review must be retained until the later of: resolution of the loans, claims or expenditures questioned in the program review; or the end of the retention period otherwise applicable to the record under 34 C.F.R. § 668.24(e).

We would like to express our appreciation for the courtesy and cooperation extended during the review. Please refer to the above Program Review Control Number (PRCN) in all correspondence relating to this report. If you have any questions concerning this report, please contact DeNise Hill at (206) 615-3638 or Kimberly Wu at (415) 486-5619.

Sincerely,

(b)(6)

Dyon F. Toney
Compliance Manager
San Francisco/Seattle School Participation Division

cc: Ms. Anna Marie Lopez, Financial Aid Administrator
California Bureau for Private Postsecondary Education
Accrediting Council for Continuing Education & Training

Enclosures:

Protection of Personally Identifiable Information
Program Review Report

PROTECTION OF PERSONALLY IDENTIFIABLE INFORMATION

Personally Identifiable Information (PII) being submitted to the Department must be protected. PII is any information about an individual which can be used to distinguish or trace an individual's identity (some examples are name, social security number, date and place of birth).

PII being submitted electronically or on media (e.g., CD-ROM, floppy disk, DVD) must be encrypted. The data must be submitted in a .zip file encrypted with Advanced Encryption Standard (AES) encryption (256-bit is preferred). The Department uses WinZip. However, files created with other encryption software are also acceptable, provided that they are compatible with WinZip (Version 9.0) and are encrypted with AES encryption. Zipped files using WinZip must be saved as Legacy compression (Zip 2.0 compatible).

The Department must receive an access password to view the encrypted information. The password must be e-mailed separately from the encrypted data. The password must be 12 characters in length and use three of the following: upper case letter, lower case letter, number, special character. A manifest must be included with the e-mail that lists the types of files being sent (a copy of the manifest must be retained by the sender).

Hard copy files and media containing PII must be:

- sent via a shipping method that can be tracked with signature required upon delivery
- double packaged in packaging that is approved by the shipping agent (FedEx, DHL, UPS, USPS)
- labeled with both the "To" and "From" addresses on both the inner and outer packages
- identified by a manifest included in the inner package that lists the types of files in the shipment (a copy of the manifest must be retained by the sender).

PII data cannot be sent via fax.

Prepared for
InterCoast Colleges

OPE ID 02559400
PRCN 201230927929

Prepared by
U.S. Department of Education
Federal Student Aid
San Francisco/Seattle School Participation Division

Program Review Report
August 29, 2012

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A sample of 30 files was identified for review from the 2010-2011 and 2011-2012 (year to date) award years. The files were selected from a statistical sample of the total population receiving Title IV, HEA program funds for each award year. Appendix A lists the names of the students whose files were examined during the program review.

Disclaimer:

Although the review was thorough, it cannot be assumed to be all-inclusive. The absence of statements in the report concerning InterCoast's specific practices and procedures must not be construed as acceptance, approval, or endorsement of those specific practices and procedures. Furthermore, it does not relieve InterCoast of its obligation to comply with all of the statutory or regulatory provisions governing the Title IV, HEA programs.

This report reflects an initial finding. The finding is not final. The Department will issue its final findings in a subsequent Final Program Review Determination (FPRD) letter.

C. Findings

During the review, a specific area of noncompliance was noted. The finding of noncompliance is referenced to the applicable statutes and regulations and specifies the actions to be taken by InterCoast to bring operations of the financial aid programs into compliance with the statutes and regulations.

Finding 1: Failure to Conduct A Biennial Review of the Effectiveness of the Institution's Drug and Alcohol Policy

Citation: Per 34 C.F.R. § 86.100, an Institution of Higher Education's (IHE's) drug prevention program must include (b) a biennial review by the IHE of its program to (1) determine its effectiveness and implement changes to the program if they are needed; and (2) ensure that any disciplinary sanctions are consistently enforced.

Noncompliance: A review of InterCoast's drug abuse prevention program revealed that InterCoast failed to conduct a biennial review to determine the effectiveness of its drug abuse prevention program.

The effectiveness of a school's drug abuse prevention program may be measured by tracking:

- the number of drug- and alcohol-related disciplinary actions;
- the number of drug- and alcohol-related treatment referrals;
- the number of drug- and alcohol-related incidents recorded by campus police or other law enforcement officials;
- the number of drug- and alcohol-related incidents of vandalism;
- the number of students or employees attending self-help or other counseling groups related to alcohol or drug abuse; and
- student, faculty, and employee attitudes and perceptions about the drug and alcohol problem on campus.

The school is also required to review information provided to employees and students every two years to ensure compliance.

Institutional Action Taken to Resolve Noncompliance: During the review, the corporate representative from InterCoast was provided with a copy of the Part 86 regulations governing the drug abuse prevention program requirements with an explanation of what elements were missing in the institution's policies. InterCoast provided a copy of the current institutional statement entitled "Drug and Alcohol Abuse Prevention Program," the Supplemental Checklist for Drug-Free Schools and Campuses Regulations, and the Part 86 Compliance Checklist that are to be reviewed, completed, and signed by its students and employees. These are all documents developed by InterCoast. The review team also received a copy of a conference report signed and dated June 11, 2012, by the InterCoast committee developed specifically for the purpose of reviewing the school's drug-free campus policies. The conference report summarizes recent meeting results. A meeting was conducted to review and discuss the effectiveness of InterCoast's drug prevention program. The attendees discussed and reviewed the Alcohol and Drug Abuse and Substance Abuse Prevention Program. The report also includes the purpose of the committee, the distribution of the policy to students and staff, the InterCoast Code of Conduct, and the completion of a biennial review report on even-numbered years to ensure that InterCoast's Drug and Alcohol Abuse Prevention Program and policies are in compliance with the regulations cited above.

Required Action: Although InterCoast has taken some corrective actions to resolve this finding, InterCoast must establish written and clear procedures that provide for the process of conducting biennial reviews for the upcoming years.

A copy of these written procedures must be provided for the Department's examination to ensure that InterCoast complies with the requirements described in the citation above.

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If applicable, additional supporting documentation may be included in response to this
Program Review Report.

Appendix A: Student Sample

2010-2011

Student's Name

Student's SSN

2011-2012

Student's Name

Student's SSN

Confidential – This document contains Personally Identifiable Information and has been sent to InterCoast electronically in an encrypted format.

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Appendix C

InterCoast's Response to the Program Review Report



INTERCOAST
COLLEGES & CAREER INSTITUTE
www.intercoast.edu

September 28, 2012

Ms. Kimberly Wu
Federal Student Aid
50 Beale Street Suite 9800
San Francisco, CA 94105-1863

Dear Ms. Kimberly Wu,

This letter is in response to the Review Report dated August 29, 2012 for the Program Review conducted June 11, 2012 through June 15, 2012 (PRCN: 2011230927929; OPE ID 02559400). On behalf of InterCoast, we thank you for the opportunity to submit a response to the one finding as indicated below:

1: Failure to Conduct a Biennial Review of the Effectiveness of the Institutions' Drug and Alcohol Policy.

Response:

As acknowledged by the Program Review Team, InterCoast had taken some corrective action to resolve the finding by providing a copy of the meeting minutes to the Program Review Team regarding the biennial review that took place in June 2012. InterCoast established written procedures in the Policy and Procedures Manual to provide a clear understanding of the processes of conducting a biennial review for upcoming years.

InterCoast has updated its written Policy and Procedures Manual to provide a clear description of the processes of conducting its required biennial review.

Attachment:

Page 53 of InterCoast Policy and Procedures Manual provides clarification of the biennial review process.

The Policy and Procedures Manual shows an effective drug abuse prevention program, tracking the key elements as required by the department. The school reviews the information to employers and students every two years to ensure our compliance with the regulation.

Kind Regards,

AnnaMarie Lopez
Corporate Director of Student Affairs
InterCoast Colleges/Career Institute
818-672-2100 extension 112

<input type="checkbox"/> Orange Campus:	3745 W. Chapman Avenue, Orange, CA 92868	Phone: (714) 712-7900 Fax: (714) 937-1983
<input type="checkbox"/> Burbank Campus:	175 East Olive Ave. Third Floor, Burbank, CA 91502	Phone: (818) 500-8400 Fax: (818) 500-3987
<input type="checkbox"/> Carson Campus:	1 Civic Plaza Drive, Suite 110, Carson, CA 90745	Phone: (310) 847-8400 Fax: (310) 847-7577
<input type="checkbox"/> Riverside Campus:	1989 Atlanta Avenue, Riverside, CA 92507	Phone: (951) 779-1300 Fax: (951) 788-7844
<input type="checkbox"/> Sacramento Campus:	6524 44 th Street, Suite 208, Sacramento, CA 95823	Phone: (916) 427-7700 Fax: (916) 427-7755
<input type="checkbox"/> West Covina Campus:	1400 West Covina Pkwy, 3 rd Fl., West Covina, CA 91790	Phone: (626) 337-6800 Fax: (626) 337-6861
<input type="checkbox"/> Roseville Campus:	1200 Melody Lane, Suite 100, Roseville, CA 95678	Phone: (916)786-6300 Fax: (916) 786-6430
<input type="checkbox"/> South Portland Campus:	207 Gannett Drive, Suite 1, S. Portland, ME 04106	Phone: (207) 822-9802 Fax: (207) 822-9801

STUDENT CONSUMER INFORMATION

Family Educational Rights and Privacy Act (FERPA)

The Family Rights & Privacy Act of 1974 prohibits an institution from releasing school records or any other information about a student to any third party without the student's written consent. InterCoast protects the privacy of all students. Students are guaranteed right to access to their own files. Student files are maintained for five years, whether or not the student graduates.

Policy

To protect the privacy of students and families, federal law sets certain conditions on the disclosure of personal information from records kept by schools that participate in the financial aid programs. The relevant law is the Family Educational Rights and Privacy Act of 1974.

Procedure

Every new student is given a copy their FERPA rights. In addition, students are given an additional copy on or before October 1st of every year. Distribution is initiated by the Corporate Director of Student Affairs and followed through by the campus Student Services and Financial Aid. Forms are given to the student (in person, email, or mail). A copy of the FERPA rights is posted in the Financial Aid Office and Student lounge area.

Drug and Alcohol Abuse Prevention Policy

In accordance with the Drug Free Schools and Communities Act, InterCoast prohibits the unlawful possession, use, or distribution of illicit drugs and alcoholic beverages by students on its property or as part of any of its activities. Any student who is involved with the unlawful possession, use, or distribution of illicit drugs or alcohol is subject to expulsion from school and referral for prosecution for violations of applicable local, state, and/or federal laws. Students are encouraged to seek help, if needed, by contacting the Education Director or designee for a list of professional treatment centers in the local area. Conversations are held in strict confidence.

The full Drug and Alcohol Policy / Abuse / Prevention information can be found within the Campus Crime Report, located on the intranet, the Financial Aid Department and is distributed annually every October 1st.

A Biennial Review is done every even year to highlight InterCoast's compliance with the Drug-free School and Communities Act, to determine effectiveness, implement necessary changes, and ensure that disciplinary sanctions are enforced.

INTERCOAST BIENNIAL REVIEW

In compliance with the Drug-Free Schools and Communities Act

Certification of the Biennial Review:

As President of InterCoast Colleges, I have read this report and support the Alcohol and Other Drug Policy

Geeta A. Brown, President

Date

Part 86, the Drug-Free Schools and Campuses Regulations, (DFSCA) requires that, as a condition of receiving funds or any other form of financial assistance under any federal program, an institution of higher education (IHE) 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. If audited, failure to comply with the Drug-Free Schools and Campuses Regulations may cause an institution to forfeit eligibility for federal funding. For complete details of requirements go to the InterCoast Alcohol and Drug Abuse Policy.

In order to certify its compliance with the regulations, an IHE must adopt and implement a drug prevention program to prevent the unlawful possession, use, or distribution of illicit drugs and alcohol by all students and employees both on school premises and as part of any of its activities. Creating a program that complies with the regulations requires an IHE to do the following:

1. Prepare a **written policy** on alcohol and other drugs.
2. Develop a sound method for **distribution of the policy** to every student and IHE staff member each year.
3. Prepare a **biennial review report** on the effectiveness of its alcohol and other drug (AOD) programs and the consistency of policy enforcement.
4. Maintain its biennial review report on file, so that, if requested to do so by the U.S. Department of Education, the campus can submit it.

DFSCA Biennial Review Information

According to the DFSCA, all colleges and universities receiving federal funds must complete the biennial review on even-numbered years; the next review must be completed by the end of the year 2012.

Periodically, the US Department of Education may direct the Higher Education Center to audit a weighted sample of biennial reviews from colleges and universities nationwide. The Center will contact the campuses to be included in the sample directly.

Minimum Requirements

The Drug-Free Schools and Campuses Regulations require at a minimum that each institution distribute the following in writing to all students and employees annually:

- Standards of conduct that clearly prohibit the unlawful possession, use, or distribution of illicit drugs and alcohol on school property or as part of any school activities
- A description of the applicable 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 re-entry programs that are available to employees or students
- A clear statement that the institution will impose sanctions 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

The law further requires an institution of higher education to conduct a biennial review of its program:

- To determine its effectiveness and implement changes if they are needed
- To ensure that the sanctions developed are enforced consistently

InterCoast has developed and maintains a drug prevention policy.

InterCoast distributes annually to each student and employee a copy of the drug-free policy.

InterCoast provides services and activities to promote a strong drug-free campus environment.

InterCoast conducts a biennial review of its drug prevention program and policy to determine effectiveness, implements necessary changes, and ensures that disciplinary sanctions are enforced.

InterCoast tracks the number of drug- and alcohol-related legal offenses and referrals for counseling and treatment.

The existing InterCoast AOD abuse prevention program and policies are believed to be in compliance with DOE regulations. However, the following findings and recommendations are intended to provide additional support and continuous improvement in the enforcement of the existing prevention program.

COMMITTEE FINDINGS:

1. The committee concluded that the use of a student alcohol and drug use survey, as suggested on the compliance checklist, (SUPPLEMENTAL CHECKLIST Drug-Free Schools and Campuses Regulations (EDGAR Part 86)) to "determine effectiveness, implement necessary changes, and ensure that disciplinary sanctions are enforced" should be utilized in the prevention program. This survey will be developed by September 2012 and utilized in October 2012.

2. An online link to **Students' Self-Care Information** to help students make informed choices about their health will be made available on the Office of Student the Student Services Coordinator and the Institution Web site by October 2012.

- The inclusion of comments by the Department of Education to explain the "yes" and "no" answers on the compliance checklist provided valuable information for the review committee.
- Policies were reviewed for compliance with DFSCA Regulations. The committee concluded that InterCoast policies are consistent when reference is made to alcohol and other drugs.
- The Student Services Coordinator at each campus offers referrals to necessary mental health resources. A broad range of community based services are available to students to address concerns that interfere with academic success and occupational attainment.

COMMITTEE RECOMMENDATIONS:

- The committee recommends InterCoast continue a good faith effort to comply with provisions of the 2008 Reauthorization of the Higher Education Act.
- The committee recommends that continuous effort be made to improve the effectiveness of its prevention program communications to students, faculty and staff.
- That committee recommends InterCoast continue to distribute prevention program materials in person as part of the New Hire and Admissions Packets and again in October of each year, and possibly in the syllabus for the Professional Development (PD100) classes.
- The committee recommends the use of student alcohol and drug use surveys for students at each campus followed by the use of focus groups to determine the effectiveness of the school's Alcohol and Other Drug (AOD) abuse prevention program education materials.
- The committee recommends InterCoast Administrative Policies and with reference to alcohol and/or drugs should be reviewed and updated as necessary.

The committee certifies that the university is in compliance with the minimum requirements of the Drug-Free Schools and Campuses Regulations. DFSCA regulations require institutions to distribute an AOD annual notification to faculty, staff and students.

Committee Members:

Annamarie Lopez, Corporate Director of Student Affairs

Geeta Brown, President

Kelly Michaud, Corporate Director of Compliance and Curriculum

Maria Wilson, Assistant Director of Student Services

Committee Member not in Attendance: Jose Aragon, Corporate Director of Alcohol & Drug Counseling Studies Program

ANNUAL CAMPUS CRIME REPORT

InterCoast Colleges, Orange Campus

October 2012

The Corporate Director of Student Affairs prepares this report to comply with the Disclosure of Campus Security Policy and Crime Statistics. This report is prepared obtaining available information from the local law enforcement agencies surrounding our campus, the Presidents Office, the Student Services Office, and the Campus Director's Office. Each entity provides updated information on their educational efforts and programs to comply with the campus security requirements.

Campus crime, arrest and referral statistics include those reported to designated campus officials (including but not limited to directors, department heads, designated staff, student services coordinators and advocates), and local law enforcement agencies.

Each year, enrolled students are provided with access to this report, either in the financial aid office or by e-mail notification. Faculty and staff receive similar notification with their paycheck. Copies of the report may also be obtained at the Campus Director's Office or by calling the Corporate Office at (818) 672-2100. All prospective employees may obtain a copy from the Business Office or by calling (818) 672-2100. The information is provided with the employment applications, if requested. Notification of the availability of this report is located in the school catalog.

Timely Warnings

In the event that a situation arises, either on or off campus, that, in the judgment of the College President, constitutes an ongoing or continuing threat, a campus wide "timely warning" will be issued. The warning will be issued through the college e-mail system to students, faculty, and staff. Depending on the particular circumstances of the crime, especially in all situations that could pose an immediate threat to the community and individuals, letters may be issued to active students, staff and faculty. This will allow for a more immediate notification. In such instances, a copy of the notice is posted in the student lounge. Anyone with information warranting a timely warning should report the circumstances to the President office, by phone (818-672-2100 Extension 111) or by email at gbrown@intercoast.edu. Telephone notification is preferred, as it allows immediate response time from the President's Office.

To report a crime:

Contact the Campus Director's Office at **714-712-7900** or President's Office at **818-672-2100** (non-emergencies), or dial 9-1-1 (emergencies only). Any suspicious activity or person seen in the parking lots or loitering around vehicles, inside buildings or around the Campus should be reported immediately to the Campus Director or manager on duty or the local police department. In addition you may report a crime to the following areas:

Presidents Office: **818-672-2100 Extension 111**

Director's Office: **714-712-7900**

Off-campus options, contact: **City of Orange Police Department at 714-744-7444.**

Confidential Reporting Procedures

If you are the victim of a crime and do not want to pursue action within the School System or the criminal justice system, you may still want to consider making a confidential report. With your permission, the Campus Director or a designee of InterCoast Colleges/Career Institute can file a report on the details of the incident without revealing your identity. The purpose of a confidential report is to comply with your wish to keep the matter confidential, while taking steps to ensure the future safety of yourself and others. With such information, the School can keep an accurate record of the number of incidents involving students, determine where there is a pattern of crime with regard to a particular location, method, or assailant, and alert the campus community to potential danger. Reports filed in this manner are counted and disclosed in the annual crimes statistics for the institution.

Crime Reporting Procedures

All members of the campus community are encouraged to report crimes which occur on the campus to the Campus Director; ideally as soon as possible following discovery of the offense. The Campus Director will ask questions to gain as much information as possible. It's important for the Campus Director to

determine; What happened? Where it happened? When it happened? Is/was a weapon involved? Is/was a vehicle involved? What did the suspect look like? Is the suspect still there? Was anyone injured?

In the case of a reported crime, a local Police Officer will then respond, investigate and may complete a written report. He or she may completely investigate the incident, including the arrest of the responsible party, or may conduct an initial investigation and forward the case to Detectives/investigators for further action. Criminal charges, if warranted, are either filed directly with the courts or through the District Attorney's Office.

Working Relationship with Other Law Enforcement Agencies

InterCoast enjoys an excellent rapport and effective relationship with allied law enforcement agencies. Should a major crime occur on campus that exhausts the resources of InterCoast's Campus Security Authority, the Burbank Police Department shall be asked to assist with their resources.

Emergency Response and Evacuation Procedures

Notification of Campus Emergencies: InterCoast will, without delay and upon confirmation of a significant emergency or other dangerous situation involving an immediate threat to the health or safety of students or employees occurring on or affecting the campus, use any one or a combination of several methods to notify as many people as possible in a timely manner. InterCoast students, faculty and staff may use the institution's internal intercom system or opt to receive text and/or e-mail emergency notifications.

InterCoast Authorities may delay notification in cases in which, in the professional judgment of responsible authorities, immediate notification would compromise efforts to assist victims or to contain, respond to or otherwise mitigate the emergency. InterCoast will evaluate the circumstances of an event and will assign the appropriate priority based on safety considerations for life, property and environment, in that order. In-progress events will generally take priority over events that have just occurred or that have occurred at some earlier point in time. Actual, occurring events will generally take priority over similar events that may potentially occur in the future. The content and scope of the notification will be determined at the earliest possible point in an event, and the notification may be initiated by the Campus Director, Staff or Faculty, as determined by the particular circumstances. The scope of the notification - who/which segments of the community will be notified - will be determined by the same people, and will reflect the nature and scope of the event. An event contained in a small area or a single room will likely dictate a smaller scope of notification than would an uncontained or dynamic event. Subsequent notifications to the larger community will generally be made by the Campus Director.

Access Policy

During business hours, the School will be open to students, parents, employees, contractors, guests, and invitees. During non business hours, access to all facilities is by key, if issued. In the case of periods of extended closing, the College will admit only those with prior written approval to all facilities. Some facilities may have individual hours, which may vary at different times of the year. Examples are the Resource Room and Conference Rooms. In these cases, the facilities will be secured according to schedules developed by the Campus Director. Emergencies may necessitate changes or alterations to any posted schedules.

Law Enforcement

InterCoast employees on duty have the authority to ask persons for identification and to determine whether individuals have lawful business at the School. Designated Employees have the authority to ask persons without lawful business at the School to leave the premises. These employees have the authority to contact the police should individuals who have no business at the School refuse to leave the premises. Criminal incidents are referred to the local police. All crime victims and witnesses are strongly encouraged to immediately report the crime to campus Authorities and the appropriate police agency. Prompt reporting will assure timely warning notices on-campus and timely disclosure of crime statistics.

General Procedures for Reporting a Crime or Emergency

Community members, students, faculty, staff, and guests are encouraged to report all crimes and public safety related incidents to the President's Office in a timely manner. To report a crime or an emergency on the campus after normal hours, dial 911. Non, emergency after hours, contact the **City of Orange Police Department at 714-744-7444**. To report a crime or an emergency on the campus or a non-emergency

matter during normal business hours, contact the Campus Director at **714-712-7900** or the President's office at **818-727-1212**.

Someone is available at one of these respective telephone numbers during normal business hours to answer your call. In emergency situations after hours, call the local police department. In response to a call, the appropriate personnel will take the required action, asking the victim to report to the Campus Director's office to file an incident report.

All incident reports are followed by the Campus Director for review and potential action. The Campus Director, after consultation with the President, will investigate a report when it is deemed appropriate. Additional information obtained via the investigation will also be forwarded to the President. If assistance is required from the Police Department or the Fire Department, the appropriate unit will be contacted. If a sexual assault or rape should occur, staff on the scene, will offer the victim a wide variety of services.

Security Awareness Programs

During enrollment, students are informed of the campus crime statistics, security and where to report crimes. Students are given information crime on-campus and in the immediate surrounding neighborhood. Similar information is presented to new employees. Crime Prevention Programs and Sexual Assault Prevention Programs are offered periodically. A common theme of all awareness and crime prevention programs is to encourage students and employees to be aware of their responsibility for their own security and the security of others.

Drug and Alcohol Abuse Prevention Policy

In accordance with the Drug Free Schools and Communities Act, InterCoast prohibits the unlawful possession, use, or distribution of illicit drugs and alcoholic beverages by students on its property or as part of any of its activities. Any student who is involved with the unlawful possession, use, or distribution of illicit drugs or alcohol is subject to expulsion from school and referral for prosecution for violations of applicable local, state, and/or federal laws. Students are encouraged to seek help, if needed, by contacting the Education Director or designee for a list of professional treatment centers in the local area. Conversations are held in strict confidence.

Student and Employees

Students and employees are prohibited from the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance or alcohol anywhere on property belonging to the school including grounds, parking areas, anywhere within the building(s), or while participating in school-related activities. Students or employees who violate this policy will be subject to disciplinary action up to and including expulsion or termination of employment.

As a condition of enrollment or employment, students and employees must abide by the terms of this policy or InterCoast will take one or more of the following actions within 30 days with respect to any student or employee who violates this policy:

- 1) Report the violation to law enforcement officials.
- 2) Take appropriate disciplinary action against such student or employee, up to and including expulsion or termination of employment.
- 3) Require such student or employee to participate in a substance abuse rehabilitation program approved for such purposes by a federal, state, local health, law enforcement, or other appropriate agency.

In compliance with the law, InterCoast will make a good faith effort to maintain a drug and alcohol free school and work place through implementation of the preceding policy and will establish and maintain a drug and alcohol free awareness program.

We are providing the facts, health risks, and sanctions associated with unlawful use, possession, or distribution of illicit drugs and alcohol and consider their content an integral part of our drug-free school and work place policy.

Substance Abuse Education

PREVENTION PROGRAMS

The School has developed a program to prevent the illicit use of drugs and the abuse of alcohol by students and employees. The program provides services related to drug use and abuse including dissemination of informational materials, educational programs, counseling services, referrals and school disciplinary actions. Many services are deferred to other areas of the community and are coordinated through the school. These include:

Alcohol and Drug Education: Please see the Campus Director for a list of referral resources.

Counseling Services: Please see the Campus Director for a list of referral resources.

College Disciplinary Actions: School Appeals Committee

Health Risks

The abuse of alcohol and the use of illicit drugs are known to be detrimental to one's psychological well being and are associated with a wide variety of health risks. Among known risks are severe weight loss, malnutrition, physical and mental dependence, changes in the reproductive system, damage to the lungs, liver, brain, and even death. Secondary health risks include an increased risk of injury by accident or violence.

National Institute on Drug Abuse (NIDA) Web site (www.drugabuse.gov) provides information on all aspects of drug abuse, particularly the effects of drugs on the brain and body, prevention of drug use among children and adolescents, the latest research on treatment for addiction, and statistics on the extent of drug abuse in the United States. The Web site allows visitors to print or order publications, public service announcements, posters, science education materials, research reports and fact sheets on specific drugs or classes of drugs, and the NIDA NOTES newsletter.

Other Federal Resources

Center for Substance Abuse Prevention (CSAP)

Substance Abuse and Mental Health Services

Administration (SAMHSA), DHHS

Phone: (301) 443-9110

www.prevention.samhsa.gov

Centers for Disease Control and Prevention (CDC), DHHS

Phone: (404) 639-3534

Phone: (800) 311-3435 (toll-free)

www.cdc.gov

Safe and Drug-Free Schools Program

U.S. Department of Education (DOE)

Phone: (800) 872-5327 (toll-free)

www.ed.gov

Drug Enforcement Administration (DEA)

U.S. Department of Justice (DOJ)

Phone: (202) 307-1000

www.dea.gov

LOCAL, STATE & FEDERAL LEGAL SANCTIONS

In addition to InterCoast sanctions, students and employees are subject to appropriate Federal and State laws, which provide for fines and/or imprisonment for the unlawful possession, sale, or distribution of drugs and alcohol. The fines and/or imprisonment may vary according to the type and amount of substance involved, the offender's past record for such offenses, and a variety of other factors.

Legal Sanctions – Laws Governing Alcohol

The State of California sets 21 as the minimum age to purchase or possess any alcoholic beverage. 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. A violation of any

law regarding alcohol is also a violation of the School's Code of Conduct and will be treated as a separate disciplinary matter by the School.

Sexual Assault Prevention and Response

The College provides education through community resources about sexual assaults and date rape. Students and employees of the Maine Campus can call the **California Coalition on Domestic Violence at 1-800-524-4765** for additional referrals, or **RAINN at 1-800-656-HOPE** to find a rape crisis center in their area. This organization also offers sexual assault education and information programs to College students and employees upon request. Literature on date rape education and sexual assault materials are available through the President's Office at 818-727-1212.

If you are a victim of a sexual assault at this institution, your first priority should be to get to a place of safety. You should then obtain necessary medical treatment. The Administration strongly advocates that a victim of sexual assault report the incident in a timely manner. Time is a critical factor for evidence collection and preservation. An assault should be reported directly to a school official or the police. Filing a police report will not obligate the victim to prosecute, nor will it subject the victim to scrutiny or judgmental opinions from officers or school staff. Filing a police report will

- Ensure that a victim of sexual assault receives the necessary medical treatment and tests, at no expense to the victim
- Provide the opportunity for collection of evidence helpful in prosecution, which cannot be obtained later (ideally a victim of sexual assault should not wash, douche, use the toilet, or change clothing prior to a medical/legal exam)
- Assure the victim has access to free confidential counseling from counselors specifically trained in the area of sexual assault crisis intervention.

When a sexual assault victim contacts a school official, the City Police will be notified. A representative from the President's office will also be notified. The victim of a sexual assault may choose for the investigation to be pursued through the criminal justice system. A representative from the President's office will guide the victim through the available options and support the victim in his or her decision. Various counseling options are available from the school through the Campus Director's Office. Counseling and support services outside the school system can be obtained through **RAINN at 1-800-656-HOPE** or through the **California Coalition on Domestic Violence at toll free 1-800-524-4765** or other resources available at the school. Ask for the Resource Directory. School disciplinary proceedings, as well as special guidelines for cases involving sexual misconduct, are detailed in the Student Catalog.

Sex Offender Registration

Information is provided to students upon request of where to find information on a Sex Offender list or registry. The State establishes a website as the official internet public access to the sex offender registration computerized database. In California, the website is www.meganslaw.ca.gov or the national registry at <http://www.nsopr.gov>. Registry information provided under this section shall be used only for the purposes of the administration of criminal justice, screening of current or prospective employees, volunteers or otherwise for the protection of the public in general.

**Annual InterCoast Career Colleges Campus Crime Statistics
Campus: Orange, California Main Campus**

CRIME	2009	2010	2011
<u>Criminal Offense on Campus</u>			
Murder/Non-negligent manslaughter	0	0	0
Negligent manslaughter	0	0	0
Sex Offenses - Forcible	0	0	0
Sex Offenses - Non-forcible	0	0	0
Robbery	0	0	0
Aggravated Assault	0	0	0
Burglary	0	0	0
Motor Vehicle Theft	0	0	0
Arson	0	0	0
<u>Criminal Offense Public Property</u>			
Murder/Non-negligent manslaughter	0	0	0
Negligent manslaughter	0	0	0
Sex Offenses - Forcible	0	0	0
Sex Offenses - Non-forcible	0	0	0
Robbery	1	0	0
Aggravated Assault	1	0	0
Burglary	0	0	0
Motor Vehicle Theft	0	0	0
Arson	0	0	0
<u>Criminal Offense - Hate Crimes on Campus</u>			
Murder/Non-negligent manslaughter	0	0	0
Negligent manslaughter	0	0	0
Sex Offenses - Forcible	0	0	0
Sex Offenses - Non-forcible	0	0	0
Robbery	0	0	0
Aggravated Assault	0	0	0
Burglary	0	0	0
Motor Vehicle Theft	0	0	0
Arson	0	0	0
Simple Assault	0	0	0
Larceny-Theft	0	0	0
Intimidation	0	0	0
Destruction/damage/Vandalism of Property	0	0	0
Other Hate Crimes	0	0	0
<u>Criminal Offenses - Hate Crimes - Public Property</u>			
Murder/Non-negligent manslaughter	0	0	0
Negligent manslaughter	0	0	0
Sex Offenses - Forcible	0	0	0
Sex Offenses - Non-forcible	0	0	0
Robbery	0	0	0
Aggravated Assault	0	0	0
Burglary	0	0	0
Motor Vehicle Theft	0	0	0
Arson	0	0	0
Simple Assault	0	0	0
Larceny-Theft	0	0	0
Intimidation	0	0	0
Destruction/damage/Vandalism of Property	0	0	0
Other Hate Crimes	0	0	0
<u>Crime Arrests - On Campus</u>			
Illegal weapons possession	0	0	0
Drug law violations	0	0	0
Liquor law violations	0	0	0
<u>Crime - Disciplinary Actions - On Campus</u>			
Illegal weapons possession	0	0	0
Drug law violations	0	0	0
Liquor law violations	0	0	0
<u>Crime Arrests - Public Property</u>			
Illegal weapons possession	0	1	1
Drug law violations	0	9	5
Liquor law violations	0	1	3
<u>Crime Disciplinary Actions Public Property</u>			
Illegal weapons possession	0	0	0
Drug law violations	0	0	0
Liquor law violations	0	0	0