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Drug-Free Schools and Communities Act Compliance at Michigan Community Colleges

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ABSTRACT

In 1989, Congress passed the Drug-Free Schools and Communities Act Amendments to address illegal alcohol and drug abuse on college campuses. To receive federal funding, each college must comply by implementing an alcohol and drug prevention program, but the federal government and some colleges have paid little attention to this policy. Recently, the Department of Education vowed to intensify its scrutiny of colleges and has begun issuing fines for noncompliance. There have been no studies on this topic in over 20 years, leaving community college administrators, in particular, without guidance on how to implement the required programs. In this study, I analyzed public reports from Michigan community colleges to evaluate compliance with the Drug-Free Schools and Communities Act and to examine their alcohol and drug programs. I found that 21 of Michigan's 28 community colleges partially complied with the Act, only two implemented all the required mandates, and five were noncompliant. Most notably, colleges failed to collect substantive programmatic outcomes data, and few offered evidence-based alcohol and drug prevention programs to students. I provide rationale for why colleges should invest in improving compliance and the quality of alcohol and drug programs, and I offer seven recommendations to community college administrators on how to do so.

Higher education administrators are inundated with the demands of increasingly complex federal regulations. Most notably, renewed attention to Title IX (1972) and the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (1990) has resulted in burgeoning sexual misconduct policies and a growing list of complaints against universities (Kelderman, 2014; Thomason, 2015a). One federal statute has received much less attention from administrators, the government, researchers, and the press: The Drug-Free Schools and Communities Act Amendments of 1989 (hereafter "the Act" or "DFSCA"), which requires all federally funded colleges to implement an alcohol and drug prevention program. The federal government failed to audit colleges for compliance for over 10 years (Scott, 2012), and in that time, administrators may have neglected to implement the required programs.

Little is known about how colleges comply with the Act because there has been no published research on the topic since 1992. Consequently, administrators lack information about best practices for compliance. Community college administrators may be particularly vulnerable to weak policy implementation due to limited resources and competing demands. Yet, the Department of Education recently corrected its auditing process and has begun fining colleges for noncompliance (Crim, 2016a, 2016b; Gust, 2014). The lack of information on how best to comply and heightened governmental pressure can create a serious problem for administrators.

In addition, substance abuse continues to plague US college campuses. It is estimated that 65% of all college students drink in a given month, 44% of 18–22-year-old college students drink excessively (White & Hingson, 2014), and 23% of college students use an illicit drug in a given month (Arria et al., 2013). Despite considerable differences in the environments of universities and community colleges, the drinking rates for community college students are close to national averages (Cremeens-Matthews & Chaney, 2016; Wall, Bailey Shea, & McIntosh, 2012). Students who abuse alcohol or drugs face significant consequences, including poor academic performance, dropping out, overdose, injury, sexual assault, changes in brain function, substance abuse disorders, and death (Arria et al., 2013; White & Hingson, 2014). This evidence corroborates the need for strong prevention programs, which should exist at all colleges nationwide if DFSCA is implemented consistently.

The purpose of this study is to assist community college administrators by filling the 20-year gap in research on DFSCA compliance. I analyzed public reports from Michigan's 28 community colleges to evaluate compliance with the Act and to examine alcohol and drug programs. As a result, I offer recommendations to community college administrators who seek to improve compliance and the quality of alcohol and drug prevention programs.

The problem

To frame the problem, I first introduce the Drug-Free Schools and Communities Act, its history, and its mandates. Then, I describe current issues with the Act, especially the wave of recent compliance enforcement by the US Department of Education, which contributes to the need for this study.

The act

First passed in 1986, the Drug-Free Schools and Communities Act allocated funding for institutions of higher education (IHEs) to create drug abuse prevention and education programs. In the 1989 National Drug Control Strategy, the White House accused IHEs of being “diffident” to addressing drug abuse and called for stricter policy enforcement and better programs:

More is required of our colleges and universities. In the future, the Department of Education will require institutions to develop and make available for review detailed descriptions of drug prevention programs and policies. These plans should clearly address the consequences to faculty, staff, and students of using drugs on campus. And these plans will be required as a condition of eligibility for any Federal aid—including grants and contracts, not just Student Financial Assistance. (U.S. Office of National Drug Policy, 1989, p. 52)

Born from this War on Drugs vision, Congress amended the Act to create a more robust order for IHEs. President George H. W. Bush signed the amendments into law on December 12, 1989. IHEs had to certify understanding of and commitment to the regulations, which reportedly overwhelmed the Department of Education (ED) with paper forms by the first deadline in October 1990 (Meyers, 1990). This was likely in reaction to the strict enforcement and sanction procedures of the amended Act. In the event of noncompliance, the 1989 amendments gave ED the authority to compel compliance agreements and ultimately force the repayment and termination of all federal funds, including grants and student financial aid (Drug-Free, 1989).

The Act mandates three primary tasks: (a) deliver an annual notification of drug-free policies, (b) implement an alcohol and other drug (AOD) prevention program, and (c) perform a biennial review of the AOD program (Drug-Free, 1989). First, the written annual notification must be delivered to students and employees (including faculty) in order to inform them of standards of conduct, legal consequences for violations, health risks of drug use, available AOD counseling or treatment programs, and a promise to impose disciplinary sanctions for violations.

Second, the AOD program, by current interpretations, must include evidence-based strategies for reducing harmful, illegal substance use. ED's standards for evidence-based strategies come from research conducted by the National Institute on Alcohol Abuse and Alcoholism (NIAAA; US Department of

Health and Human Services, 2002, 2015). On its new website, the NIAAA ranks AOD programs based on effectiveness and cost (NIAAA, 2015). Importantly, “simple educational or awareness programs used alone, without any other strategies or components,” were not found to be effective, but these programs are all too common on college campuses (Saltz, 2004, p. 251).

Third, the biennial review is a critical self-assessment of compliance occurring every 2 years, which is documented in a report that must be made available to ED and the public. The purpose of the review is to gather evidence that an IHE ensured consistent enforcement of disciplinary sanctions related to AOD policy violations and that the IHE’s AOD program was effective (ED, 2006). The evidence is drawn from a variety of data sources, including evaluations of programs and student and employee discipline data. Additionally, the report should include an inventory of AOD programs and policies, program goals, strengths and weaknesses, and recommendations for improvements.

Presently, there is no singular method for compliance. The responsibility for compliance may differ depending on the resources and personnel at a given institution. ED recommends an AOD taskforce comprised of staff from AOD prevention, health services, counseling, student affairs, human resources, campus security, legal counsel, and others to complete compliance tasks, such as writing and distributing the annual notification and conducting the biennial review (ED, 2006). Finally, “the [IHE] president is expected to sign and approve the final report” (ED, 2006, p. 15). Ultimately, ED determines whether or not an IHE fully complied with the Act, and as described next, recent events have shaped the federal auditing process.

Current issues

Conversations about DFSCA were revived after a campus tragedy occurred. On February 6, 2005, two college students died in an alcohol-involved snowmobile accident at Paul Smith’s College in New York. Stephen and Ellen Guest, parents of deceased 20-year-old Quinnipiac University student Kristine Guest, sued Paul Smith’s College and lobbied Connecticut lawmakers to initiate an investigation of DFSCA enforcement (Lipka, 2012). Two federal responses stemmed from these events.

First, on September 23, 2011, ED Secretary Arne Duncan and Drug Czar R. Gil Kerlikowske issued a joint guidance letter to IHEs to announce the 2011 National Drug Control Strategy and to remind colleges about the Act. Citing facts about illegal drug use and high-risk drinking behaviors of college students, ED promised “enhanced monitoring of IHE compliance with the requirements of [the Act]” (Kerlikowske & Duncan, 2011, p. 2).

Second, on March 14, 2012, the Inspector General issued the results of an investigation into ED’s oversight of DFSCA compliance: “We determined that the Department’s Office of Postsecondary Education (OPE) performed no oversight activities of IHE drug and alcohol abuse prevention programs from 1998 to June 2010” (Scott, 2012, p. 1). OPE was always responsible for ensuring compliance, but the Inspector, “could not draw a conclusion on the appropriateness of OPE’s oversight from 1989 to 1998 because of a lack of available evidence” (Scott, 2012, p. 3). In June 2010, the ED Secretary delegated authority for DFSCA compliance review to the Federal Student Aid (FSA) office, but there had been little improvement. The Inspector selected 28 of FSA’s institutional reviews and found significant flaws, leading the Inspector to conclude, “there is no assurance that FSA’s review process ensures that IHEs are in compliance with [the Act]” (Scott, 2012, p. 4). As a result, the Inspector ordered FSA to document all DFSCA reviews, train auditors on DFSCA, report all cases of noncompliance, and identify and audit IHEs that receive federal funding other than student financial aid (Scott, 2012).

Wasting no time in flexing its enforcement arm, ED fined Mid-Atlantic Christian University \$15,000 for DFSCA noncompliance in November 2014 (Gust, 2014) and McDaniel College \$35,000 in March 2016 (Crim, 2016a). In a historic finding against Pennsylvania State University in November 2016, ED issued a nearly \$2.4 million penalty for federal violations, \$27,500 of which was for DFSCA violations. Penn State did not properly distribute its annual notification, the notification was missing required policy statements, and the university did not conduct a biennial

review or produce a report of its findings (Crim, 2016b). College administrators must now face the reality that ED will enforce DFSCA compliance, and community colleges may need the most support in implementing programs, as explained in the literature review below.

Literature review

Higher education scholars have addressed only a portion of the issues revealed above. The following section is a review of the few studies that address the Drug-Free Schools and Communities Act and AOD programs at community colleges. I also selected several studies from the broader higher education compliance literature to develop a framework for this study.

AOD programs at community colleges

Alcohol and drug services at US community colleges appear to lag behind those at universities. Researchers surveyed administrators at 106 community colleges and found weak programs and policies: 12% offer alcohol intervention programs, 10% offer treatment services, 40% offer programs for alcohol policy violators, 16% offer alcohol education to first-year students, and 17% do not offer any type of alcohol education (Lenk, Nelson, Erickson, & Toomey, 2015). The authors recommended implementing more substance abuse screening tools for prevention and replacing alcohol education with evidence-based programs (Lenk et al., 2015). In addition, DeJong (2006) advised community college presidents to improve AOD services through environmental management techniques and creating student assistance programs. With nearly half of all college students in the United States attending a community college, and with ample evidence showing community college students drink at similar rates to university students, it is time to address the inadequacies of community college AOD programs (DeJong, 2006).

DFSCA research

The DFSCA primarily created funding for K-12 drug prevention programs, and the closely related Safe and Drug-Free Schools and Communities Acts of 1994/2002 complicated my literature search. Although there are many studies of DFSCA's K-12 programs, I found only two studies of DFSCA in higher education. I searched my library's cross-disciplinary database search engine (SearchPlus), major education databases (Education Full Text, ERIC), online search engines (Google Scholar), and library holdings to find one study described in an administrator's handbook and one peer-reviewed journal article. I then broadened my search for other studies of compliance in higher education and selected three examples for review.

First, researchers surveyed 75 chief student affairs officers in order to examine compliance shortly after the Act's implementation, finding: 46% reported full compliance; 58% consulted legal counsel; the most common methods to distribute the notification were via mass mailings, central registration, and campus mail; and around 40% spent over \$5,000 each on mailing the notifications (Guthrie, 1992). The authors also found administrators held a range of cynical, positive, and ambivalent attitudes regarding the Act's intent and effectiveness (Guthrie, 1992). This study was an early benchmark that revealed inadequate compliance and mixed administrator attitudes. New studies are needed to reassess these variables, including compliance rates, cost, attitudes of administrators, and methods of annual notification distribution.

Second, Palmer, Gehring, and Guthrie (1992) studied the effectiveness of the DFSCA annual notification. Well before e-mail was a feasible option, administrators mailed the notification via the US Postal Service. Lawmakers presumed students would read this notification to learn about laws and school policies, consequences for violations, negative health effects of drug use, and campus AOD programs. The researchers assessed understanding of these mandated topics by surveying 402 students from 55 IHEs. Generally, the authors found that students were most knowledgeable about

the health effects of substance use and state and local laws, but students learned most of that before going to college. The students reported knowing less about college policies, disciplinary sanctions, and counseling programs. Overall, students ranked letters and mailings low as a source of information. The authors concluded that despite the mandate, mailing the annual notification was an expensive, ineffective way to educate students. Instead, they suggested using the public media and classroom instruction to deliver the notification of policies and resources (Palmer et al., 1992). This study had notable limitations especially that the authors did not assess directly if students knowingly received, read, or understood the notification. Most IHEs now employ a combination of e-mail and website methods to distribute the notification, which deserves an updated study of effectiveness.

Evaluating policy compliance

In addition to the DFSCA compliance study described above (Guthrie, 1992), researchers have evaluated the extent of compliance with other federal policies in higher education. Next, I review a few examples to frame my strategy for studying DFSCA compliance.

One study assessed the extent to which a sample of community colleges complied with a rule in the Clery Act that required all colleges to disseminate campus crime policies to prospective students (Callaway, Gehring, & Douthett, 2000). The researchers sent postcard requests for admission information to colleges and received materials from 117, only 26 of which (22%) contained the required safety information. The materials from 8 colleges were determined to be fully compliant with the Clery Act, while the rest, 18, were only partially compliant.

In another study of Clery Act compliance, the Department of Justice studied a random, national sample of over 1,000 IHEs (Karjane, Fisher, & Cullen, 2005). They analyzed the content of written sexual assault policies, surveyed administrators about compliance, and conducted eight site visits. They found most institutions complied unevenly with the law, but 4-year and Historically Black institutions tended to fare better than 2-year and tribal colleges. Only 37% of institutions fully complied with crime data reporting requirements.

Another researcher studied how 16 institutions in Nebraska complied with the Family Educational Rights and Privacy Act of 1975 (“FERPA”; Sayer, 2005). The author analyzed published institutional policies and procedures related to the implementation of FERPA regulations and interviewed responsible administrators, finding missing or deficient annual notification procedures, variations in the definition for educational record and in appeals procedures, and other inconsistencies in the implementation of FERPA rules (Sayer, 2005).

Framework for studying compliance

These examples, including the DFSCA compliance study (Guthrie, 1992), offer two insights that form the framework for this study. First, higher education has a history of noncompliance with federal policy. In all of these cases, institutions failed to comply fully with federal laws, and there have been many news reports in recent years of colleges struggling to comply with federal rules for sexual assault, records privacy, copyright, discrimination, online education, campus safety, and more. Thus, an updated investigation of DFSCA compliance is warranted and fits into this body of research literature on higher education compliance.

Second, researchers used a variety of direct and indirect exploratory approaches to evaluate compliance. Direct approaches included analyzing written policies and other documents mandated by law; indirect approaches included surveying or interviewing administrators about perceived compliance. Both approaches required mixed methods, as in using qualitative methods to analyze policy documents or interview responses and using quantitative methods to analyze survey data or to measure compliance indicators. Because the earlier DFSCA study used indirect methods to examine compliance (Guthrie, 1992), I designed my study to employ direct methods. The primary source documents that capture DFSCA compliance are the

biennial review reports and annual notification documents. Analyzing these documents using mixed methods yields the most accurate and unbiased account of an institution's compliance activities. With this framework in mind, I next describe the purpose of the study and my methods for data collection and analysis.

The study

Purpose and research questions

The Drug-Free Schools and Communities Act (1989) remains a regulatory requirement for US higher education institutions. After nearly two decades of neglected federal enforcement, college administrators can expect increased governmental intervention and fines for noncompliance. Community colleges offer fewer AOD programs, yet their students drink at alarming rates. With so little research on DFSCA compliance and AOD programs in community colleges, administrators strapped for resources may struggle to meet the mandates. The purpose of this study is to examine DFSCA compliance and AOD programs at Michigan community colleges to capture the current state of affairs and to yield recommendations for improving compliance. It is significant in that no published research since 1992 has addressed DFSCA compliance, and with increasing federal auditing, administrators need information to improve compliance and strengthen AOD programs. As such, I pose the following research questions:

- (a) To what extent have Michigan community colleges complied with the Act?
- (b) What do Michigan community colleges do to comply with the Act?
- (c) What AOD programs do Michigan community colleges offer to students and employees?

Paradigm and methodology

Pragmatism is a philosophy concerned with situations and their consequences, with problems and solutions (Creswell, 2014). I follow the pragmatic worldview in this study because I view the lack of research and practical guidance on DFSCA implementation as problematic. When employed in framing research methodology, pragmatism “offers an immediate and useful middle position philosophically and methodologically” between quantitative and qualitative, and “it offers a practical and outcome-oriented method of inquiry that is based on action” (Johnson & Onwuegbuzie, 2004, p. 17). It allows for using the most convenient and appropriate methods for answering the research questions (Creswell, 2014). Thus, I used a mixed-methods methodology to collect and analyze data, as was employed in other studies of higher education compliance (Karjane et al., 2005; Sayer, 2005).

Methods

Using document analysis methods, I evaluated two documents required by DFSCA: annual notifications and biennial review reports. These documents are internal records that are convenient for uncovering a college's characteristics, strengths and weaknesses, policies, processes, and priorities without being subject to recall bias (Mahoney, 1997). First, I read each annual notification document multiple times to search for the seven elements explicitly required by law. I found the seventh element, adequate distribution procedures, sometimes described in the biennial review reports. Although I briefly comment later on the quality of the notifications, my analysis was focused on measuring compliance through searching for and counting each of the required elements. All seven elements and associated counts are displayed in Table 1. For full compliance, each college must account for all seven elements.

Second, I analyzed the biennial review reports. The Act does not describe requirements for the biennial review as explicitly as it does for the annual notification. As such, I analyzed the content of each biennial review report using an adapted checklist from the administrator's handbook, which included legally required and recommended activities (ED, 2006). I read each report multiple times

Table 1. Required elements in annual notifications.

Required elements	Number of colleges ($n = 26$)	Percentage of colleges ($n = 26$)
Disciplinary Sanctions	25	96
Standards of Conduct	25	96
Treatment Options	25	96
Health Risks	24	92
Legal Sanctions	24	92
Addresses Students & Employees	22	85
Adequate Distribution Methods ^a	17	65

Note. Two of 28 colleges did not have an annual notification, making $n = 26$.

^aAdequacy is defined as a description of distribution methods that reasonably ensured all employees and students received the annual notification once per year.

Table 2. Required elements in biennial review reports.

Required elements	Number of colleges ($n = 24$)	Percentage of colleges ($n = 24$)
Disciplinary Sanctions Data	18	75
Program Recommendations	18	75
AOD Program Inventory	14	58
Policy Inventory	13	54
Strengths & Weaknesses Analysis	10	42
Program Goals Statement	9	38
Determined Sanction Enforcement Consistency ^a	3	13
Determined Program Effectiveness ^a	2	8

Note. Four of 28 colleges did not have a biennial review report, making $n = 24$.

^aThe only two elements explicitly described by the Act. All others are recommended by ED's (2006) handbook.

and marked off items on the checklist as I found them. For full compliance, each college must have provided evidence in its biennial review that it satisfied the Act's two explicit requirements (determining program effectiveness and determining consistency of disciplinary sanctioning). The other six elements on the checklist are activities that are highly encouraged of administrators but are not explicitly required by law (see Table 2).

Third, I took a closer look at one element within the biennial review reports, the AOD program inventory, to answer the second sub question. Neither the Act nor ED requires specific programs; wide discretion is given to each institution in choosing programs. With no checklist or predetermined codes for AOD programs, I inductively coded the reports to document the diversity of AOD programs offered to students and employees (Creswell, 2014). I reviewed each report multiple times to categorize and count all references to AOD interventions, programs, events, initiatives, and offerings. Most codes were drawn verbatim from *in vivo* terms in the reports. For example, most colleges used consistent terms when describing employee assistance programs or listing off-campus substance abuse agencies for referral. The notable exception was that colleges reported a wide variety of educational events, which I collapsed into the category "Awareness/Education/Training," including information tables, workshops, orientation presentations, speakers, and staff development trainings. These are collapsed because they are insular educational activities, which previous research suggests may be ineffective in changing drinking behaviors (NIAAA, 2002). I list the final codes, or types of AOD program, in Table 3.

Determining whether or not a college complied with AOD program requirements was the most subjective of the three elements. The handbook implies a wide range of programs could be acceptable, but evidence-based strategies are preferred (ED, 2006). After I conducted the inventory of programs, I determined a college to be compliant if it offered students any additional AOD program other than printed or online resources or referral information to off-campus substance abuse treatment services, alone. This decision is further explained below.

Finally, a college is considered fully compliant if it meets the minimum requirements for all three elements: annual notification, biennial review, and AOD program. If a college meets the requirements in

Table 3. AOD programs for students and employees.

Programs ^a	For Students (n=26)		For Employees (n=26)	
	Number of Colleges	Percentage of Colleges	Number of Colleges	Percentage of Colleges
Printed/ Online Resources	26	100	26	100
Off-Campus Resources/ Referrals	25	96	25	96
Awareness/ Education/ Training	16	62	8	31
Short-Term/ Limited On-Campus Counseling Services	15	58	2	8
Screening Tools	4	15	5	19
Employee Assistance Program ^b			15	58
Insurance/ Medical Programs ^b			8	31
Leave of Absence			5	19
Signed Drug-Free Policy Acknowledgement Form			3	12
Pre-Employment Drug Testing			1	4
Alcohol-Free Student Activities ^b	7	27		
Mandated Education Program	4	15		
Student Organization/ Support Group (A.A.)	2	8		
Substance Abuse Coursework	2	8		
Full-Service On-Campus Counseling Services	1	4		
Student Athlete Drug Testing	1	4		

Note. Two colleges had neither annual notification nor biennial review, making $n = 26$.

^aSome programs were offered to employees and students, while other programs were available to one or the other.

^bIt is likely that all colleges offer Employee Assistance Programs and health insurance plans to employees and alcohol-free activities to students, but only some colleges described them as AOD programs in their biennial reviews or annual notifications.

Table 4. Michigan community college DFSCA compliance.

College identifier ^a	Annual notification ^b	Biennial review ^c	AOD program ^d	Degree of compliance
1	X	X	X	Full
2	X	X	X	Full
3				Non
4				Non
5				Non
6				Non
7				Non
8	X		X	Partial
9	X		X	Partial
10	X		X	Partial
11	X		X	Partial
12	X		X	Partial
13	X		X	Partial
14	X		X	Partial
15	X		X	Partial
16	X		X	Partial
17	X		X	Partial
18	X			Partial
19	X			Partial
20	X			Partial
21	X			Partial
22			X	Partial
23			X	Partial
24			X	Partial
25			X	Partial
26			X	Partial
27			X	Partial
28			X	Partial
N (%)	16 (57%)	2 (7%)	19 (68%)	

Note. ^aColleges are de-identified and listed in random order to protect anonymity, sorted by compliance. $N = 28$.

^bAnnual Notification compliance is defined as having all seven required elements, see Table 1.

^cBiennial Review compliance is defined as having the two required elements, see Table 2.

^dAOD program compliance is defined as offering any type of AOD program to students other than online/printed resources and off-campus referrals, see Table 3.

one or two elements, it is considered partially compliant. If a college meets none of the minimum requirements for any of the three elements, it is considered noncompliant (see [Table 4](#)).

Data collection

To study DFSCA compliance and AOD programs, I evaluated the annual notifications and biennial review reports from all public community colleges in the state of Michigan ($N = 28$). Both are public documents containing no identifiable student or employee data; thus, I did not need Institutional Review Board approval. Because annual notifications are meant for public dissemination, they were commonly posted on college websites, embedded in policy handbooks, and/or existed as standalone print documents or files, such as brochures. Although three colleges posted their biennial review reports online, most colleges delivered their reports to me upon request. After searching college websites, e-mailing administrators, and invoking the Michigan Freedom of Information Act (FOIA), I obtained a sample of 24 biennial reports (86%) and 26 annual notifications (93%). I invite readers to contact me in order to view these documents. While reviewing college websites, policy handbooks, and other sources may have provided additional information related to AOD programs, these data are not direct indicators of compliance. My analysis was limited to the biennial review reports and annual notifications because these are the documents that, by statute, should directly and completely document a college's compliance activities.

Results

I display my results in three tables corresponding to the Act's mandates: annual notification ([Table 1](#)), biennial review ([Table 2](#)), and AOD program ([Table 3](#)). [Table 4](#) displays all colleges scored by the three mandates; in total, two colleges fully complied, 21 colleges partially complied, and five colleges were noncompliant.

Annual notifications

Officials at two colleges reported having no annual notification, a notable compliance failure. [Table 1](#) displays the seven required elements of the annual notifications with the frequency of colleges that complied. I found 16 colleges had satisfactory annual notifications containing all the required elements. Page lengths ranged from less than one to 23 pages, indicating wide variation in content. In some cases, the notifications were clearly directed at students with no or incomplete references to employees. Colleges can either send tailored, separate notifications to employees and students or one combined notification to all, but both groups must be notified of all the required elements, annually.

Adequate delivery of the notification, not just content, is essential. Colleges must *deliver* the notification to all students and employees annually and should describe delivery methods in the biennial review. Adequate delivery entails delivering the notification to each new student and employee upon enrollment or employment and delivering it to each person once per year after that. A key finding is 17 colleges (65%) described an adequate process for delivery, as in this exemplar from Kalamazoo Valley Community College:

Notification of the information contained in the DAAPP [Drug and Alcohol Prevention Program] is distributed to all current employees of the college on an annual basis via an all-staff email. New employees will receive notification during their Orientation process... Notification of the information contained in the DAAPP is distributed to all currently enrolled students twice each semester via email. The initial email will be sent 2-3 weeks after the start of the Fall, Winter and Summer semesters. The second email will be sent 2-3 weeks after the 2nd 8 week class begins during the Fall, Winter, and Summer semesters. The Department of Public Safety will oversee the distribution of the DAAPP. The DAAPP is also available for review online. (p. 9)

ED requires a clear distribution plan for new employees and students who enroll at different points during the semester. Kalamazoo Valley compensated for the continuous enrollment pattern

common at community colleges by sending out the notification twice during each semester, including summer. Colleges that only post their notification online, in handbooks, or e-mail it once per year do not adequately notify students and employees.

I also found some colleges overlapped DFSCA policy with other policies; the exact amount of overlap was difficult to measure as disentangling the policy language was not always possible. Several colleges conflated DFSCA language with the Drug-Free Workplace Act of 1988, and one college appeared to confuse the two. The Drug-Free Workplace Act requires federally funded institutions to notify employees of their drug-free policies, treatment and assistance programs, penalties for violations, and a policy requiring employees to notify the employer of any new drug convictions (Drug-Free, 1988). Similarly, many colleges included some or all of the annual notification in the Clery Act Annual Security Report. Like DFSCA, the Jeanne Clery Act (1990) requires policy statements about alcohol and drugs and a description of AOD education programs in the annual security report. I offer recommendations on dealing with policy overlap below.

Biennial reviews

Four Michigan community colleges did not conduct biennial reviews, indicating significant failures in compliance. The main purpose of the biennial review report is to document the data collection and analysis required to demonstrate AOD program effectiveness and consistency of disciplinary sanctioning; it appears that only two colleges achieved some degree of both. The most common inadequacies of the biennial reviews were declarations that lacked supporting evidence. For example, one institution concluded, “The College has a very effective response and referral process and an annual educational activity. There is no need at this time to modify activities,” and another stated, “The conclusion of this review is that the program in place currently is effective in fulfilling the requirements of the [Act].” In both cases, the reports were less than one page each and provided no data or descriptions of evaluation methods to support their claims. Similarly, two colleges supplied meeting minutes that summarized a committee discussion of AOD programs as their biennial review report, which on its face is insufficient for the complex analysis of policies, programs, and data required for the biennial review.

Notably, only 18 colleges reported AOD-related disciplinary data, and of those, seven colleges reported zero incidents. It is tempting to conclude that substance abuse poses no problem on those campuses, as one did: “Based on the violations and sanctions data, [the college’s] program is effective and no changes are recommended.” However, more data must be collected before concluding programmatic efficacy. As shown in [Table 2](#), most of the biennial reports lacked the elements needed for a good-faith program and policy analysis.

Of the 18 colleges that listed recommendations for program improvements, the most common were as follows: improving or offering more AOD programs (56%), updating or improving the promotion of information, policies and programs via social media, websites, and/or print resources (44%), and conducting surveys of student substance abuse, programming needs, and wants (33%). I offer additional recommendations for administrators who want to improve DFSCA compliance and the quality of AOD programs below.

Eighteen colleges acknowledged the administrators who conducted the biennial review, who often formed a committee. The departments most frequently represented included human resources (78%), vice president and/or dean of student services (56%), campus safety/police (56%), and student services (e.g., student activities, student conduct, financial aid, others) (56%). This provides new insight into who is doing DFSCA compliance work at community colleges.

AOD programs

[Table 3](#) displays the AOD programs described by Michigan community colleges; these findings add to the small literature on AOD programs in community colleges (Lenk et al., 2015). For students,

most campuses offered AOD awareness or education programs (62%) or limited on-campus counseling services (58%), but none described the evidence-based strategies recommended by the NIAAA (2002, 2015). Limited on-campus counseling services typically includes short-term counseling and referral services but does not include full-service substance abuse treatment. Instead, printed or online resources (e.g., brochures, websites) were the most commonly employed educational strategy (100%), and all but one college (96%) provided a list of off-campus agencies where students and employees could be referred for substance abuse services. In total, seven colleges offered only printed/online resources or off-campus referrals as their entire AOD program for students, but 19 colleges offered at least one other AOD program. For the purposes of this study, these 19 colleges are considered fully compliant for the AOD program element. Evaluating the quality and effectiveness of the programs identified in Table 3 is beyond the scope of this paper, but previous research would cast doubt on the value of most these programs (NIAAA, 2002, 2015). Additional research is needed to understand what AOD programs are most effective for community college students, and clearer guidance from ED is needed to know how it determines compliance of AOD programs.

Compliance

The vast majority of Michigan community colleges made efforts to distribute an annual notification, conduct a biennial review, and implement AOD programs. In total, only two colleges provided sufficient evidence demonstrating full compliance. Five colleges were classified as noncompliant because they satisfied none of the required mandates. Twenty-one colleges satisfied the full requirements for only one or two of the mandates and were classified as partially compliant (see Table 4).

Limitations and future research

This study was limited to community colleges in Michigan. A national study of community colleges would more accurately capture the state of DFSCA compliance. Additionally, a national study of universities, for-profit colleges, and other institutions that receive federal funding is needed, since no related studies have been conducted since 1992. A strength of this study is its accessible methods, and I invite researchers to examine the annual notifications and biennial reviews of colleges in their home states.

My analysis of compliance was based on my training and experience as a community college student affairs administrator responsible for DFSCA compliance. I also used checklists that were recommended by ED but are not themselves law. Therefore, my analysis is open to critique, and administrators at colleges in the sample may successfully defend their programs and policies to federal auditors. It is up to each institution, and their legal counsel, to determine an adequate level of compliance.

It was outside the scope of this paper to discuss AOD programs for employees. A large literature exists on workplace AOD use and the effectiveness of employee assistance programs, drug testing, and health promotion programs for public employees. Because the Act requires IHEs to offer programs to employees, I encourage human resources directors to review research and select the best available programs. I also encourage researchers to examine substance abuse among faculty, staff, and student employees and to examine compliance with the Drug-Free Workplace Act (1988) at higher education institutions.

Finally, this study was not designed to examine how or why some colleges complied better than others. Additional research is needed to understand the conditions or actors that promote strong compliance and those that do not. Existing policy theory may provide explanations for the variations in DFSCA compliance, and below, I recommend considering these findings through the lens of street-level bureaucracy theory.

Discussion

In my review of public documents from Michigan community colleges, I found variation in compliance with the Drug-Free Schools and Communities Act (1989). Most colleges had some form of annual notification, biennial review, and AOD program, but only two implemented all the requirements. Importantly, few of the colleges substantively evaluated their programs to determine effectiveness or to ensure the consistent enforcement of disciplinary sanctions, and two colleges had neither annual notification nor biennial review. Instead of implementing evidence-based AOD prevention programs, most colleges offered weaker program options, including printed/online resources, referrals to off-campus services, and awareness/educational events. Therefore, all Michigan community colleges must work to improve DFSCA compliance and the quality of AOD programs.

There are several justifications for improving DFSCA compliance. As noted above, complying with DFSCA remains a legal obligation, and colleges now face hefty fines for noncompliance. Although complying for legal reasons may be reason enough, DFSCA also provides a framework for administrators to address campus safety and student health, both of which are pressing contemporary issues. College students continue to abuse alcohol and drugs at alarming rates despite facing significant consequences. In particular, the link between alcohol use and sexual assault is undeniable (Abbey, Wegner, Woerner, Pegram, & Pierce, 2014; Krebs, Lindquist, Warner, Fisher, & Martin, 2009). For the many Title IX administrators pressed to reduce campus sexual violence, an obvious strategy is investing in evidence-based AOD prevention programs and policies, which are shown to be promising for reducing sexual violence and other alcohol-related consequences (Lippy & DeGue, 2016). At community colleges, especially, merging Title IX and DFSCA efforts could save valuable time and resources.

Data from this study do not provide an explanation for *why* or *how* Michigan community colleges largely failed to comply with DFSCA, so I offer one plausible theoretical explanation that deserves further study. Lipsky's (1976, 2010) theory of street-level bureaucrats has been applied ubiquitously to workers throughout the public service sector, including educational administrators, to explain policy implementation behaviors (Weatherley & Lipsky, 1977). According to the theory, workers share common working conditions, including inadequate resources, time, and information, the worker's authority is regularly challenged, agency goals are vague, ambiguous, or conflicting, and performance expectations are unattainable (Lipsky, 1976, 2010). As a result, the workers (termed "street-level bureaucrats") cope by making selective decisions about which policy elements to implement and which to neglect. Ultimately, they are unable to implement all the requirements, and as a result, policy compliance is never fully achieved (Lipsky, 1976, 2010; Weatherley & Lipsky, 1977). Scholars have long observed that college administrators face similarly constraining working conditions, including "lack of cooperation with supervisors... position limitations... little involvement with the mission and goals, role ambiguity... limited resources... [and] high expectations for performance" (Johnsrud & Rosser, 1999, p. 123). If Michigan community college administrators operate under similar conditions, this theory could explain the inadequate implementation of DFSCA regulations. Additional research is needed to learn about their working conditions, their constraints, how they cope under those conditions and constraints, and how the DFSCA implementation process is impacted.

Recommendations for improving compliance

According to my findings, Michigan community college administrators largely failed to distribute an annual notification, conduct a thorough biennial review, and implement evidence-based AOD prevention programs. Understanding that these administrators may lack resources and support for DFSCA compliance, I offer the following recommendations on accessible ways to improve DFSCA compliance and the quality of AOD programs.

- (1) *Seek training.* To strengthen understanding of DFSCA mandates, administrators can start by reviewing the Act itself and ED's (2006) handbook, which are available online. Although the federal *Higher Education Center for Alcohol and Other Drug Abuse and Violence Prevention* is now defunct, Ohio and Illinois have Higher Education Centers that provide relevant resources. The NIAAA maintains a website dedicated to college drinking prevention, and student affairs professional organizations offer training and resources.
- (2) *Collect data.* The biennial review reports were by far the weakest of the three elements, because most colleges in this study provided no data, no descriptions of research methods, and incomplete program and policy inventories. The aforementioned handbook is the best source of instructions on required data collection for the biennial review; for example, colleges should assess AOD program outcomes, study student and employee AOD use, collect referral and disciplinary data, take inventory of policies, and more (ED, 2006). Most of these data points can be collected by lower-level administrators and do not require the involvement of Institutional Research staff, which may be a limited resource at community colleges. Administrators must use data to draw conclusions about program effectiveness and the consistency of sanctions enforcement. Conducting studies of AOD use is an important place to start when determining what AOD programs are needed, and accessible surveys include the Core Alcohol and Drug Survey and the National College Health Assessment.
- (3) *Implement evidence-based programs.* Most colleges in the study offered some form of AOD education, but few employed evidence-based strategies. Colleges can improve DFSCA compliance and the quality of AOD programs by investing in the NIAAA-recommended programs found on its new website, called *CollegeAIM (Alcohol Intervention Matrix)*, where college administrators can review updated research on the best individual—and environmental-level drinking prevention strategies. A few of the most effective strategies include personalized feedback interventions, cognitive-behavioral skills training, brief motivational interventions, and enforcing the drinking age (US Department of Health & Human Services, 2015). The organizers understand that cost is a barrier, so they divided programs into high, medium, or low cost options. Community colleges with limited resources, for example, can inexpensively train counselors and nonclinician administrators to deliver the popular, effective BASICS program (Fachini, Aliane, Martinez, & Furtado, 2012).
- (4) *Find models.* Six colleges appeared to use the same annual notification template, which one college attributed to Lansing Community College. The template is strong, and using tried-and-true templates saves time. Templates for the annual notification and biennial review report are available in ED's (2006) handbook and on the *Illinois Higher Education Center for Alcohol, Other Drug and Violence Prevention (IHEC)* website (www.eiu.edu/ihec/).
- (5) *Be transparent.* Although not required by the Act, three colleges deserve credit for posting their biennial reviews online. One purpose of the biennial review report is to provide higher education consumers and auditors with information about programs, policies, and outcomes. Making the biennial report accessible on college websites portrays a commitment to transparency and accountability. Because eight colleges requested ten-day extensions to respond to my FOIA request, FOIA coordinators could benefit from learning about the Act and keeping the biennial review on hand so they can respond more quickly to requests.
- (6) *Beware of overlap.* DFSCA shares similarities with other federal policies, and administrators must be mindful when combining notifications to preserve specific requirements. Because the Clery Act Annual Security Report must be delivered annually to employees and students, it may be a convenient vehicle for the DFSCA annual notification. There are pitfalls with this approach, however, and the Penn State case provides detailed analysis on this issue (Crim, 2016b). ED's (2016) campus safety reporting handbook provides instructions for managing DFSCA-Clery overlap, and ED's (2015) financial aid handbook does the same for DFSCA-Drug-Free Workplace Act overlap.

- (7) *Invite governmental assistance.* As perilous as it may sound, ED supports colleges in their efforts to improve compliance by providing technical assistance. Administrators can seek guidance by contacting ED regional offices. What colleges should avoid is punitive government intervention from complaints or audits; a review of recent higher education news yields many examples of federal policy violations resulting in hefty fines, imposed policy changes, and bad press (see DeSantis, 2014; Thomason, 2015b). There is little doubt that punitive government intervention leads to improved, albeit forced, compliance.

Conclusion

All US higher education institutions have an obligation to comply with the Drug-Free Schools and Communities Act of 1989 by annually notifying students and employees about programs and policies, implementing an alcohol and drug prevention program, and reviewing programs for effectiveness every 2 years. In this study, I found that most Michigan community colleges partially complied with the federal mandates. Thus, I argue all should work to improve compliance, especially by conducting a thorough biennial review and by investing in evidence-based AOD programs. The consequences of noncompliance include large fines from the federal government and possibly a sustained culture of harmful student substance abuse. My seven recommendations give community college administrators a place to start making improvements, and I encourage readers to pay attention to how the US Department of Education responds to DFSCA noncompliance in the near future.

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