# Hoban Student Wellness: Drug and Alcohol Awareness and Prevention Policy Adopted 8/2019

# PHILOSOPHY

"We shall always place education side by side with instruction; the mind will not be cultivated at the expense of the heart. While we prepare useful citizens for society, we shall likewise do our utmost to prepare citizens for heaven." — Blessed Basil Moreau, C.S.C.

Archbishop Hoban High School seeks to promote education of the entire person by fostering the physical, emotional, social, intellectual, and spiritual wellness of its students for their own growth and development as men and women who serve others. Hoban has a vital interest in maintaining a positive learning environment, one that is safe and healthy for all of its members. To this end, Hoban accepts its responsibilities to:

- Educate students, parents, and the community about the risks and consequences of the use of alcohol, tobacco, and other drugs.
- Encourage students to live in accordance with the laws of our city, state, and nation concerning the use of these substances. This includes establishment and enforcement of related school rules for all students.
- Support good decision making and help students develop the life skills that will better prepare them to handle the prevailing social and cultural pressures.
- Guide students and families toward help as needed for chemical dependency and support them in these efforts.

#### PURPOSE

To help achieve this goal and fulfill these responsibilities, Hoban has established a policy with regard to drug and alcohol use. The purpose of this policy is to:

- Provide a healthy and safe environment for all students.
- Encourage all students to remain drug and alcohol-free.
- Enable students to assume responsibility for regulating their personal lives in ways that will result in their becoming healthy representatives of the school and community.
- Offer solutions and support for any student who uses drugs and alcohol.
- Provide the school with positive guidelines and disciplinary policies to support positive decisions and behaviors and to address violations of the drug-free policy.

The Student Wellness: Drug and Alcohol Awareness and Prevention Policy focuses on studentparent communication, restorative support, and recognition of the moral significance of drug and alcohol abuse.

*Prevention, not punishment, is the primary focus of this policy and the accompanying drug and alcohol testing program.* The policy and its components are used to deter initial use and to identify anyone in need of help.

### RATIONALE

Attendance at a Catholic high school is not a right, but a privilege. With that privilege, come certain responsibilities. Students and parents are held to a high standard of behavior in areas that affect well-being and safety and that help to make a positive contribution to the school, the community and society. Those students who uphold their responsibilities and behavior have a right to learn and grow in an environment that is alcohol and drug-free.

Responsible alcohol use is a privilege, not a right, and the privilege to consume alcohol begins at age 21, as mandated by state and federal law. The use of illicit drugs or abuse of prescription drugs is never acceptable. Drug and alcohol use is not part of "normal adolescent development." It is never appropriate for students to possess/use drugs or alcohol or for families to provide opportunities for alcohol consumption or drug use by minors. Possession/use of drugs or a minor's possession/use of alcohol is illegal and will have an impact on developmental and academic progress. Studies have repeatedly shown that the longer individuals wait to use alcohol or experiment with drugs, the greater the chances that they will not have problems with alcohol or drugs (Kirby and Barry 377).

Further, studies have shown that alcohol is a true gateway drug (Kirby and Barry 377). Additionally, as a Catholic school, we believe that we are created, body and soul, in the image of God. The Catechism of the Catholic Church states:

"The human body shares in the dignity of the 'image of God'...and it is the whole human person that is intended to become, in the body of Christ, a temple of the Spirit" (CCC 364). Our Catholic Christian faith teaches us to respect our bodies. Alcohol and drug abuse does harm to our bodies, and therefore violate our whole being.

Co-curricular activities are a vital dimension of a total Hoban education, a positive learning experience that can enhance achievement of personal potential through adherence to a lifestyle dedicated to integrity, self-discipline, and cooperation. In addition, selection for a school-sponsored team, organization, or club is both a privilege and an honor, and as such carries responsibilities commensurate with leadership roles. As leaders and more highly visible representatives of Hoban, students in such activities have an increased obligation to represent themselves and their school in an exemplary manner.

#### POLICY

Hoban is employing a two-part policy concerning the use of drugs and alcohol by our students. The first component (The Health and Wellness Program) fosters a community of drug and alcohol free students who are well on their way to understanding how to make appropriate decisions concerning the use and abuse of drugs and alcohol. The second component (The Disciplinary Program) is designed to intervene in the life of a student who chooses to bring drugs or alcohol onto campus or chooses to be in possession or under the influence of drugs or alcohol off campus at a school event.

The tenure of the policy extends from the date of the student's first enrollment at Hoban until the student graduates, transfers to another institution, or is otherwise removed and is in effect 365 days per year.

# Drug and Alcohol Policy - Part 1: The Health and Wellness Program

Hoban strives to be a community where our students are empowered to make responsible choices to avoid alcohol and drugs. Our goal in this regard is a drug and alcohol free student body. To this end, *all students at Hoban are subject to mandatory random drug and alcohol testing at different times throughout the school year*.

# Confidentiality

The results of all drug testing will be kept strictly confidential, in accordance with written school policy and the Family Education Rights and Privacy Act. Test results <u>will not</u> be documented in any student's academic record and will be destroyed in accordance with the school's document retention policy. The information gathered will be shared with parents and appropriate school administrators as deemed appropriate and will be used to help the students make positive choices.

# Process of Testing for the Health and Wellness Program

Hoban has employed the services of Great Lakes Biomedical, an Ohio-based drug and alcohol testing company, to administer, collect, process, and analyze drug and alcohol test samples. On dates determined by the school administration, Great Lakes Biomedical will utilize a random number generator to select students for testing. The school will not be involved in the process of random selection. Random testing dates will be unannounced, and the frequency and percentage of students tested each time will be determined by the school administration. All students will be tested at some point throughout the school year, and some students may be tested more than once per school year. The testing company will utilize different types of tests, obtaining samples from students via saliva swab, urine screen, or hair follicle, to determine use of drugs or alcohol. *Refusal to submit to a test or avoiding a test will be treated as a positive result* and the refusal may be grounds for dismissal from school.

# Self-Referrals

A self-referral occurs when a student asks a counselor, administrator, or any other school personnel for help and an assessment <u>prior to</u> any known violations of this policy. A self-referral may only happen prior to a student being notified that he/she must submit to a random test. A student may utilize a self-referral only once in four years. If a student makes a self-referral, the student must:

- Complete a school-approved drug assessment and counseling program and provide verification to the schools Wellness Coordinator. The counselor/agency providing the program must be certified by the Ohio Department of Health or the Ohio Department of Alcohol and Drug Addiction Services. Parents/guardians must pay for this expense.
- Submit to <u>three</u> random drug tests within the next 12 months, paid for by the student's parents/guardians. The testing dates will be determined by the appropriate school designee and testing will be completed only by Great Lakes Biomedical.

If the student tests positive during the follow-up drug tests, the student will be subject to "First Positive" consequences.

### Collection Process and Test Analysis

On the testing date, the student will be notified to report to the collection site. A specimen from the student will be obtained according to the standard collection process for each test described in the Addendum/FAQs to this policy. The collection process is subject to change because of the procedural requirements by the testing agency. Hoban High School reserves the right to change the collection process at any time to coincide with the testing guidelines set forth by the testing agency or a change in school administrative policy – parents will be notified of such.

When using rapid screens, all non-negative screens will be sent out with a chain of custody to a certified laboratory for confirmation. A Certified Medical Review Officer employed by Great Lakes Biomedical will verify the positive test. Further information regarding the test analysis can also be found in the Addendum/FAQs to this policy.

#### Communication of Test Results

Test results will not be shared with the Dean of Student's Office, the Principal, or law enforcement. The coordinator of Hoban Health and Wellness Program, will send an email home to parents/guardians of each student tested indicating that the student was asked to submit to a random test on that testing date.

For those students whose test results are negative for drugs and alcohol, Great Lakes Biomedical will share a "list of negatives" with the Wellness coordinator.

For those students whose results are positive for drugs or alcohol, Great Lakes Biomedical Laboratories will share the information with the parents/guardians of such students (per the test analysis protocol found in the Addendum/FAQs to this policy) and with the Hoban Health and Wellness Coordinator. This school official will send an email home to the parents/guardians of such students within one day of receiving the information, will inform the student's school counselor, and the following provisions will go into effect:

#### First Positive Test Result

Positive test results are cumulative in nature and consequences related to such results accrue throughout a student's tenure at Hoban (i.e. do not re-set with each calendar year). Students whose test results yield a First Positive for some drug and/or alcohol use will do the following:

- 1. The Health and Wellness Coordinator will set a meeting with the student's school counselor, the student, and at least one parent/guardian.
- 2. Students and parents/guardians will discuss the information gleaned from the analysis of the test sample with the Wellness Coordinator and school counselor. As this is a Health and Wellness program, there will be no disciplinary consequences at this time. The purpose of the meeting is to assist the family in seeking any necessary help and interventions.

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Since the First Positive of a random test is considered a guidance conversation with the student and parent/guardian, **there will be no consequences affecting participation in co-curricular activities**.

- 3. Students will be required to complete a drug and alcohol prevention and education class, sponsored or approved by Hoban. The fee for this course is approximately \$75.00.
- 4. Students with a "First Positive" result will be tested on <u>three</u> additional random testing dates over the next 12 months by representatives of Great Lakes Biomedical at the school.
  - a. After three negative tests, the student will be placed back in the random pool. Any future positive test result will be regarded as a Second Positive.
  - b. If any of the next immediate three tests is positive, the student will be placed in the Second Positive category.
- 5. All testing required after the initial random test will be charged to the student's parents/guardians. The total cost of the intervention class and the <u>three</u> additional tests will be approximately \$120.00.

# Second Positive Test Result

If, after the First Positive, the test results are again positive for drug or alcohol use, it will be considered a "Second Positive."

- 1. Upon notification of the Second Positive, The Health and Wellness Coordinator will set a meeting with the student's school counselor, the student, and at least one parent/guardian. The Second Positive result will also require the student to complete a chemical dependency screening at an agency approved by Hoban, and follow any recommendations of the chemical dependency evaluation within six weeks of being informed of the positive test result. <u>In addition</u>:
  - a. A Second Positive result will require that a limitation be placed on a student's cocurricular involvement. A plan for wellness integration into the student's life will be developed and will take precedence over participation in co-curricular activity. The plan will be developed by the wellness coordinator and school counselor with input from the student and parents. The plan will be placed in a contract to be signed by all parties.
  - b. A Second Positive result will require a student to resign from all leadership positions (captaincy, officer roles, retreat leadership, etc.) for the remainder of the school year.
- 2. Failure to follow the guidelines of the chemical dependency evaluation may jeopardize a student's continued enrollment at Hoban.
- 3. Students with a Second Positive will submit to <u>five</u> random tests over the next 12 months.
  - a. If the Second Positive re-test results are negative for the duration of the next 12 months, the student will be placed back in the random pool.
  - b. If any of the Second Positive re-test results are positive, the student will be placed in the "Third Positive" category.
- 4. All testing required after the initial random test will be charged to the student's parents/guardians. The total cost of the intervention class and the <u>five</u> additional tests will be approximately \$160.00.

#### Third Positive Test Result

If, after the Second Positive, the test results are again positive for some drug or alcohol use, it will be considered a "Third Positive."

1. Upon a third positive test, a dismissal hearing meeting will be scheduled with the Principal and his team to determine the student's next course of action.

# Drug and Alcohol Policy - Part 2: The Disciplinary Program

In all areas of student discipline, it is incumbent on the administration of Hoban, as a Holy Cross school, to seek the formation of the young man or woman in our care. In many matters of discipline, detention or occasional probation periods are necessary. The use of drugs and/or alcohol **at school or at school events** is a significantly more complicated disciplinary issue. In the cases of drugs and alcohol, both activities are illegal and may require the school to involve law enforcement personnel. Off-campus drug or alcohol use is also illegal and unhealthy and, through the student's actions, may be harmful to the reputation of the school.

#### Definitions/Understanding

- 1. DRUG shall be defined as any illicit or illegal drug, prescription drug for which a student's use does not have proper physician authorization, alcohol, or drug paraphernalia.
- 2. TOBACCO violation is defined as use or possession of tobacco, nicotine, electronic cigarettes, vape pens, Juuls, or related materials in any form at any time. (\*)
- 3. USE shall be defined as consumption or possession. Possession shall mean on the person, or on the property owned and/or used by the person. Property shall include a building, vehicle, locker or other gathering area.
- 4. CONFISCATION is defined as the seizure or sequestration of items related to drug/alcohol or tobacco usage by students. Any such items confiscated by the school during investigatory procedures will not be returned to the students or their families.
- 5. REASONABLE SUSPICION TESTING is when school officials utilize their right to have a student tested for use of alcohol or drugs, when they believe there is a "reasonable suspicion" that the student possesses, is using, has recently used, or is under the influence of illegal substances.
- 6. SELF-ADMISSION is defined as an admission by a student to the school administration that he/she has recently used or possessed drugs/alcohol. A student may self-admit at any point prior to the time that he/she is given notice to complete a reasonable suspicion drug test (i.e. when he/she is asked questions directly relating to an incident/event at which drugs/alcohol may have been present to or in use by students). A student may not self-admit after he/she is asked to complete a test based on reasonable suspicion of alcohol/drug use relating to an incident/event at which drugs/alcohol may have been present.
- (\*) This is not meant as a comprehensive list as these types of products are constantly evolving.

# *Class I Violations – Policy on Possession of Drugs/Drug Paraphernalia with the Intent to Sell/Distribute*

Any student who possesses or controls illegal drugs or drug paraphernalia and sells or distributes, or intends to sell or distribute such materials to other members of the Hoban community has voided his/her right to remain as an active member of the community, and as such, will be immediately dismissed from Hoban High School.

Class II Violations - Policy on Hosting or Providing Alcohol or Illegal Substance Related Parties and Policy on Possession or Use of Alcohol or Other Illegal Drugs at School or any School-Sponsored Functions

Any student who hosts or facilitates a party or gathering at which alcohol or illegal drugs are illegally used by minors, or provides or procures a facility for any such party or gathering, has seriously violated the behavior expected by members of the Hoban community. This infraction is so harmful to the relationship that should exist among individual members of our community that each such student will face disciplinary consequences up to and including dismissal from school based on aggravating and mitigating circumstances.

Any student who illegally possesses and/or uses alcohol or other drugs prior to attending or while attending school or any school-sponsored function, has violated a "sacred" space of the school community. Hoban insists on protecting the physical, academic and social space of the school community from illegal use of alcohol or other drugs. This infraction is so harmful to the relationship that should exist among individual members of our community that each such student will face disciplinary consequences up to and including dismissal from school based on aggravating and mitigating circumstances.

Consequences will be assigned for each student at the discretion of the school's administration after considering the circumstances. Such circumstances shall include any one or more of the following factors as the situation indicates:

- The nature and extent of the transportation and safety risks to those attending the party or gathering and to others (or risks to those attending school or the school function)
- The size of the party or gathering
- The nature and extent of the student's involvement in any planning, publicity and/or fees charged in connection with the party or gathering, use, or distribution of the alcohol or drugs
- The amount of alcohol or drugs involved
- The nature of the conduct of the attendees at the party or gathering (or of the student at school or the school related function)
- The student's prior disciplinary and academic history
- The academic timing of the infraction
- Any other factors that the school's administration considers relevant under the circumstances

If a Hoban student is suspected of being under the influence of drugs or alcohol at any school function, on or off campus, a school representative will detain him/her.

When school authorities have reasonable suspicion to believe or suspect a student is or has recently been under the influence of alcohol or drugs at school, or at a school related or school sponsored activity or event, based on the student's observed conduct, demeanor, appearance, or speech, or other corroborated information, the student may be requested to submit to a test using an approved sensor. If the test discloses the student to be under the influence of alcohol or drugs to any degree or extent, then the student will remain with the school authority until a parent/guardian arrives and takes custody. If a parent/guardian is unavailable, another adult member of the student's family may represent the parent/guardian. If no adult can be reached, the school may turn the student over to law enforcement authorities.

The school reserves the right to conduct random or selective searches for alcohol or other substances at school or any school related function, whether on or off campus, by school personnel and/or the Akron Police Department.

In addition, any test results may be used for disciplinary purposes (see Disciplinary Consequences section). Refusal to submit to any drug or alcohol test within the specified period of time will be treated as a positive result and the refusal may be grounds for dismissal from school.

# Class III Violations - Policy on Possession or Use of Alcohol or Other Illegal Drugs outside of School Functions

As Hoban students are called to live out the school's mission and abide by its policies away from school, the same rules regarding alcohol and drug possession and use apply to situations that occur away from school or school events. When school authorities have reasonable suspicion to believe or suspect a student has recently been under the influence of alcohol or drugs away from school, the student may be required to submit to test using an approved sensor. If the test discloses the student to be under the influence of alcohol or drugs to any degree or extent, the student will be subject to disciplinary consequences outlined under Class III Violations.

### Class IV Violations – Policy on Possession or Use of Tobacco (or associated products) in Any Form at Any Time

Any student who possesses or uses tobacco in any form while attending school or any schoolsponsored function has also violated the "sacred" space of the school community. As such, the student is subject to disciplinary consequences ranging from Saturday detention to dismissal from school.

\*Disciplinary Consequences for Student Use of Alcohol, Illegal Drugs or Tobacco (see table)

Violations	Standard Consequences	Cocurricular Consequences
CLASS I VIOLATIONS	Dismissal/Expulsion	
Possession or control of any		
illegal drugs or drug		
paraphernalia with the intent		
of sale or distribution at any		
time		
Violations	Standard Consequences	Cocurricular Consequences
CLASS II VIOLATIONS	Consequences up to and	If not dismissed, suspension
Hosting or facilitating a party	including dismissal from	from outside competition,
or gathering at which alcoholic	school. If not dismissed, 1 to 3	public representation and
beverages or other illegal drugs	day out of school disciplinary	participation in all activities for
are available for use by minors,	suspension and may be	up to 25% of each activity for
or providing or procuring a	required to appear before	the next 12 months
facility for such a party or	Disciplinary Council	Design stien from all los daughin
gathering	The offense will be treated as a	Resignation from all leadership
Illegal passage and (or use of	Positive test and the student	positions for the next 12 months
Illegal possession and/or use of alcohol, or other illegal drugs	will be subject to the protocol	monuns
or drug paraphernalia <u>at school</u>	and consequences of a Positive	At the discretion of the
or any school sponsored	test as outlined in the Health	administration, student may
function	and Wellness Program. (i.e.	lose the privilege of attending
	parent/student/wellness	specific co-curricular events
	coordinator/school counselor	specific co curricular crefics
	conference, mandatory	
	chemical dependency	
	screening, submission to three-	
	five random drug/alcohol tests	
	over the next 12 months)	
	Placement on Disciplinary	
	Placement on Disciplinary Contract for remainder of	
	enrollment at Hoban	
Violations	Standard Consequences	Cocurricular Consequences
CLASS III VIOLATIONS	First Offense:	First Offense:
Illegal possession and/or use of	<u>Self-Admission:</u> No disciplinary	Self-Admission: No co-
alcohol, drug paraphernalia	consequences; the first offense	curricular consequences
outside of school	will be treated as a First	
	Positive test and the student	
	will be subject to the protocol	
	and consequences of the First	
	Positive test as outlined in the	
	Health and Wellness Program	
	Non-Self Admission: Out of	Non-Self Admission: Immediate
	school suspension for one to	suspension from public
	three days and a	representation, outside
CLASS III VIOLATIONS	Parent/Student conference	competition and participation
(continued)	with the Dean of students. The	in all co-curricular activities for
Illegal possession and/or use of	offense will be treated as a	up to10% of <u>each activity</u>
alcohol, drug paraphernalia	First Positive test and the	within the next 12 months:
outside of school	student will be subject to the	immediate resignation from all
	protocol and consequences of	leadership positions for the
	the First Positive test as	next 12 months

	outlined in the Health and Wellness ProgramSecond Offense: Self-Admission: Out of school suspension for one to three days and student may be required to appear before Disciplinary Council. The offense will be treated as a Second Positive test and the student will be subject to the protocol and consequences of the Second Positive test as outlined in the Health and Wellness ProgramNon-Self Admission: Disciplinary Three day out of school suspension to dismissal. The student will be required to appear before	Second Offense: <u>Self-Admission:</u> Immediate suspension from public representation, outside competition and participation in all co-curricular activities for up to 25% of <u>each activity</u> within the next 12 months: immediate resignation from all leadership positions for remainder of the school year <u>Non-Self Admission:</u> Immediate suspension from public representation, outside competition and participation in all co-curricular activities for up to 50% of <u>each activity</u> within the next 12 months:
	Disciplinary Council. The offense will be treated as a Second Positive test and the student will be subject to the protocol and consequences of the Second Positive test as outlined in the Health and Wellness Program <b>Third Offense:</b> Dismissal	immediate resignation from all leadership positions for the next 12 months
Violations	Standard Consequences	Cocurricular Consequences
<b>CLASS IV VIOLATIONS</b> Possession or use of tobacco nicotine, electronic cigarettes, vape pens, Juuls, or related materials in any form at any time.	<b>First Offense:</b> Saturday detention and student will be required to complete a tobacco/vaping education program sponsored by Hoban. <b>Second Offense:</b> Out of school	First Offense: No participation in co-curricular activity during day of detention. Second Offense: Immediate
<b>CLASS IV VIOLATIONS</b> (continued) Possession or use of tobacco nicotine, electronic cigarettes, vape pens, Juuls, or related materials in any form at any time.	suspension for one to three days. A Parent/Student meeting with the Dean of Students will be required. Student may be required to appear before Disciplinary Council.	one week suspension from outside competition, public representation and participation in all activities <b>Third or Further Offense:</b> Discretion of the
	<b>Third or Further Offense:</b> Out of school suspension for three days up to dismissal. Student will be required to appear before Disciplinary Council.	administration

#### Works Cited

Kirby, Tristan and Adam E. Berry. "Alcohol as a Gateway Drug: A Study of US 12<sup>th</sup> Graders." *Journal of School Health* 82.8 (2012): 371-379. Online.

Catechism of the Catholic Church. 2nd ed. Vatican: Libreria Editrice Vaticana, 2000. Print.

#### Addendum/FAQs

### Why did Hoban decide to move in this direction regarding its drug/alcohol policy?

During the 2016-17 school year, Hoban began a review of its drug and alcohol policy, a policy that had been in place for more than a decade. A number of factors prompted this review. Disciplinary cases revealed a diminution in the concern expressed by students in their attitudes toward drugs and alcohol use. Students voluntarily met with school administrators to inform them of their concerns regarding the current policy and its effect on the student use of drugs and alcohol. There were a number of fatalities involving young alumni due to involvement with drugs and alcohol. Northeast Ohio saw a major upswing in drug availability and use, predominantly among young adults from middle to upper class backgrounds. And four local Catholic high schools (St. Ignatius, St. Edward, Gilmour Academy, and Walsh Jesuit) began mandatory drug testing programs, prompting conversations with these schools to discover more about their motivations, programs, and outcomes.

Prior to making any decisions regarding the direction of the policy discussions, the administration and faculty of Hoban High School decided to widen the scope of its examination. Identifying cultural movements and reviewing community needs, Hoban broadened its look to encompass the overall wellness of its student body. In addition, feedback from other schools indicated that any change in policy or procedures needed to be demanded and shared by stakeholders and constituents, not arbitrarily imposed from the top down. Therefore, with this counsel, Hoban expanded its approach to look at the physical, emotional, social, intellectual, and spiritual wellness of its students.

At the beginning of the 2016-17 school year, Hoban formed a Faculty Wellness Committee to look at the overall wellness of students and the supportive structures necessary for the promotion of such wellness. In addition to creating educational opportunities for faculty/staff members and students, this committee attempted to examine policies. This Committee first created a survey for students and parents to identify the attitudes of each group toward drugs and alcohol, the impact of these attitudes on policy, and the desires of each group on how to improve the school in this area. From these survey results came the following:

- ✤ A directive to eliminate the current drug and alcohol policy
- ✤ A focus on programs that educate students and parents in the areas of drugs and alcohol
- ✤ A plan to investigate a random drug testing programs, and design a program that worked for the specific needs of Hoban
- ✤ A directive to design a policy that removed fear surrounding the issue, promoted counseling and assistance for those who needed help, opened communication between the school, students, and parents, and enforced consistent and equal discipline for those who choose to violate the policy.

This policy is the result of these efforts and this focus.

# *Why did Hoban choose to employ Great Lakes Biomedical Laboratories to conduct its drug/alcohol testing?*

Great Lakes Biomedical has a long-standing record of professionalism and reliability in the area of drug and alcohol testing, specifically in the realm of school-based testing. An industry leader since 1994, Great Lakes Biomedical operates throughout Ohio and southeast Michigan. In Ohio alone, Great Lakes Biomedical currently works with over 80 schools and school districts. Their record for customer satisfaction is unparalleled, as corroborated by schools serviced by Great Lakes Biomedical contacted by Hoban High School.

One advantage of using the services of Great Lakes Biomedical is the full-service testing program that they offer. While other local schools with similar testing programs utilize employees to select students for testing, obtain samples, send samples off for processing, or communicate test results with families, Great Lakes Biomedical handles all of these services and more. Their trained professionals not only take the random selection and coding of student testing out of the hands of school personnel, but independently handle the collection, packaging, transportation, and analysis of test samples. Most importantly, certified Medical Review Officers communicate test results with parents/guardians/custodians, offering a professional medical explanation of the meaning of test results and answering questions that might arise. Removing the responsibility for such highly personal and medically-specific processes from school employees is a comfort not only to the school but to the families who will be aided by this program.

Lastly, the fact that Great Lakes Biomedical is a local company offers a tremendous advantage to the school. Their proximity enables them to send trained personnel to administer tests on short notice. The on-site screening for certain tests and the nearby location of laboratories for examining non-negative tests provides prompt turnaround times for test results. And the use of local distributors of testing kits and local processing centers greatly lowers the overall testing cost. In addition, the customer service and availability of representatives to speak to school personnel and parents makes Great Lakes Biomedical a unique and valuable resource in the school's wellness initiative.

# What is the advantage of a policy utilizing multiple types of drug/alcohol tests, as opposed a single type of testing?

Student survey results from the Fall of 2017 indicate that while some students experiment with prescription and other illegal drugs, alcohol and marijuana are the two drugs that receive the most experimentation among members of the student body. As such, the type of testing chosen needs to be able to identify use of alcohol and marijuana predominantly, but offer the ability to detect a spectrum of other drugs, as well. The combination of urine, hair, and saliva testing offers the greatest insurance that detection of alcohol and marijuana, both in binge consumption and habitual use, can be detected to help steer students away from such use. The fact that the three tests each offer a wider spectrum of drugs for which to test also ensures that users of alcohol and marijuana will not be pushed toward experimentation of other forms of drugs.

As stated in the Purpose, *"prevention, not punishment,"* is the primary focus of this policy and the accompanying drug and alcohol testing program". As such, having a variety of testing

methods serves as a deterrent to any student who wishes to try to find loopholes in a schoolbased testing system. A program based solely on urine testing (and its shorter testing window) may push students toward abusing drugs or alcohol during summer vacation or during breaks during the school year. A program based solely on hair testing may not prevent binge drinking or casual use centered around certain school functions during the calendar year (Homecoming, important games, etc.) due to the delay in drug and alcohol signatures showing up in hair follicles and a student belief that they can accurately forecast the timing of such testing. A program based solely on saliva testing may drive students toward drugs which are smoked, as such substances may make saliva detection difficult. Rather, Hoban felt it better to leave the method of testing open and multiple.

Much like a teacher who informs his/her class that a final exam will use multiple versions of the test during the exam session so as to remove students' desire to look on another's test for answers, the combination of testing methods is designed to remove any student belief that he/she can "figure out" methods to beat the test, and instead give students another reason to choose to refrain from drug/alcohol use.

Lastly, the mixture of testing is designed to truly help students who have or may develop a problem with drug/alcohol use and steer them in the direction of the help that they need. By including tests with both short-term and long-term detection windows, this program attempts to assist both students who choose to casually engage in drug/alcohol use and those who already have an abuse problem. The short-term detection window testing may better identify those students whose casual or binge use of drugs or alcohol may transform into deeper addiction by forcing a parental and counselor conversation and drug/alcohol assessment to occur. Similarly, longer-term detection window testing may more accurately pinpoint those students whose habitual addictions cause them to abuse drugs or alcohol on a periodic basis and assist in their recovery efforts.

#### How much of a sample is needed for each type of test?

Hair 100 mg (90-120 strands); about the circumference of a pencil

Urine 30 ml

Saliva About 2 ml

#### Who collects the test samples?

All administration, collection, securing, and processing of test samples is handled by trained representatives from Great Lakes Biomedical.

#### What types of drugs can the drug/alcohol tests detect?

Alcohol, Marijuana, LSD, Amphetamines, Methadone, Anabolic Steroids, Methaqualone, Barbituates, Nicotine (Tobacco), Benzodiazepines, Opiates, Cocaine, Propoyphene (Darvon), or any substance included in U.S.C. 802 (6), which an individual may not sell, offer to sell, possess, give, exchange, use, distribute, or purchase under State or Federal Law. This

definition includes all prescribed and over-the-counter drugs being used in any way other than for medical purposes in accordance with the directions for use provided for in the prescription or by the manufacturer.

### What is the standard collection process on the day of a random drug test?

The student will be notified to report to the collection site. A specimen from the student will be collected as follows and all students must follow this process:

(Urine Screens)

- All students must have a picture ID or be identified by the school administrator. No exceptions will be allowed.
- Drug testing area must be secured during the testing.
- Only lab technicians and a designated school administrator will be present for the testing as privacy must be maintained for all students.
- The principal/designee is responsible for ensuring that all of the forms are completed and signed by both parent/guardian/custodian and student. No student is to enter the collection site until forms and proper ID are completed.
- When students arrive and cannot give a sample, they will need to start drinking water provided by the lab technician or school administrator.
- No bags, backpacks, purses, cups, containers or drinks will be allowed to enter the collection area. All coats, vests, jackets, sweaters, hats, scarves or baggy clothing must be removed before entering the collection site. Any infringement of the rules will result in the student taking the test over.
- Students processed by the lab technician who cannot produce a sample will be kept in a secured area to wait until they can test. If they leave this area they will not be allowed to test and will be subject to "Positive" test consequences. They are not to have contact with anyone until after the sample is given.
- Students will be asked to hold out their hands and a sanitizer will be put on their hands or will wash hands with water. The bathroom personnel will add a dye to the toilet.
- Students will be asked to urinate directly into the collection cup given to them by the lab personnel. The lab technician will stand outside the stall/restroom and listen for normal sounds of urination.
- Any and all adulterations of the specimen will be detected and considered a violation of the drug testing policy and the student will receive consequences as outlined in the policy. (The lab checks every sample for adulteration, such as additives you drink or add to urine to change the sample.) They are not called positives but have the same

consequences.

- Any suspicion of tampering with the sample will be brought to the tester's attention. The sample will be screened or sent to the lab for immediate confirmation of tampering.
- The sample must be taken in one attempt and be at least 30 ml in size. The student must hand the cup to the lab technician.
- Students are not to flush the toilets or urinals. In the event that a student flushes the toilet he or she will be required to give a new sample immediately or the sample will be invalid.

With student watching, the lab technician will recap the sample and hand it to the student who must then return it to the intake technician. In the event that the student does not hand the cup directly to the intake technician, the sample is invalid and a new sample must be taken. If the student leaves the collection area or has contact with anyone, the sample will be invalid and the student will have to give another sample or will be subject to "Positive" test consequences.

# (Hair Follicle)

- All students must have a picture ID or be identified by the school administrator. No exceptions will be allowed.
- Drug testing area must be secured during the testing.
- Only lab technicians and a designated school administrator will be witnesses to the test.
- Privacy must be kept for all students.
- The student will be seated and the collector will begin to fill out the chain of custody form.
- The collector obtains a 100 milligram sample of hair (90 to 120 strands) cut at the scalp, from the student's head. Students with insufficient head hair will have body hair collected, such as arm, leg, or underarm hair.
- The collector secures the hair sample in foil and completes chain-of-custody documentation in preparation for shipment to the testing laboratory.
- ✤ The student is free to leave after the sample is sealed.

#### (Saliva Screens)

All students must have a picture ID or be identified by the school administrator. No exceptions will be allowed.

- Drug testing area must be secured during the testing.
- Students may be tested individually or in a group.
- The collector will have each student identified and given a test device number.
- Each student will be given a saliva collection device and told to pool about 2ml into the device.
- The collector will extract the saliva from the student into the matching test device.
- Any non-negatives will be sent to the laboratory for confirmation.

#### How are the test samples analyzed?

#### Urine

There are two main categories of urine drug testing -- screening and confirmatory. Screening tests are initial, qualitative drug tests conducted to identify classes of drugs present in the urine and typically are done using immunoassay. An immunoassay is a biochemical test that measures the presence or concentration of a macromolecule in a solution through the use of an antibody or immunoglobulin. They rely on a set threshold above which a positive result is produced and therefore do not detect lower concentrations of a drug. Screenings are typically done on-site. Confirmatory tests are used for further analysis of a sample -- to confirm a positive or sometimes, negative, result and typically are done using gas chromatography/mass spectrometry (GC/MS) or high performance liquid chromatography (HPLC). Confirmatory testing can identify a specific drug.

#### Hair

Accessioning involves the initial processing of a sample into a laboratory's system. This includes verifying that the sample was sealed and shipped properly, assigning a random LAN (Laboratory Accessioning Number), and completing any additional data entry not provided by an electronic chain of custody system.

Screening involves an initial quick check for drugs of abuse. While Screening is a cost effective way to rule out drug usage on the majority of samples, a positive screen needs to be confirmed. Any samples that are presumptively positive in screenings do require a secondary confirmation.

If a sample is presumptively positive in the Screening stage, more hair is pulled from the initial specimen and prepared for Extraction. In this stage, drugs are extracted from hair at a much lower concentration, which is why hair drug screening is the most difficult methodology to perform.

Confirmation of any positive screening result is conducted via GC/MS, GC/MS/MS or LC/MS/MS. All presumptive positive samples are washed prior to confirmation as needed. The entire laboratory process from Accessioning to Confirmation is reviewed under both the

CAP (College of American Pathologists) Hair designation and the accreditation to ISO / IEC 17025 standards.

Saliva

Initial screen uses immunoassay. The macromolecule detected by the immunoassay is often referred to as an "analyte" and is in many cases a protein.

#### *How long does it take for test results to come back?*

Urine

Initial negative screens can obtain results immediately. Laboratory confirmation happens usually within 24-48 hours. Confirmation may be delayed if parents cannot be reached.

#### Hair

Samples are always sent straight to the laboratory for processing. Results are processed in 1-3 days.

#### Saliva

Initial negative screens can obtain results immediately. Laboratory confirmation happens usually within 24-48 hours. Confirmation may be delayed if parents cannot be reached.

# How are test results communicated to families? How will parents/guardians find out if their son/daughter has been tested?

After they have been sent to the laboratory for further testing, the Medical Review Officer (a physician that has special training in drug testing), will review all "non-negatives" or suspected adulterations.

Depending upon the substances found in the urine specimen, the parent/guardian/custodian will be contacted to determine if the student is taking any prescribed medication from a physician. If the student is taking medication, the parent/guardian/custodian will be asked to obtain a letter within five (5) school days from the prescribing physician verifying the medication. Failure to provide such requested information will be considered a positive result.

The Medical Review Officer will then determine if any of the prescribed medications resulted in a positive drug screen. The Medical Review Officer may use quantitative results to determine if positive results on repeat testing indicate recent use of illicit or banned substances or the natural decline of levels of illicit or banned substances from the body. If the Medical Review Officer believes the quantitative levels determined to be above the established cutoffs do not reflect current use but natural decay, then a negative result may be reported.

Finally, the Medical Review Officer, based upon the information given, will certify the drug test results as positive or negative. Positive results will be reported to the school designee

(Assistant Principal for Faculty and Student Formation) by email.

The designee, within one (1) school day of receiving the test results from the drug testing company, will attempt to notify the parent/guardian/custodian (first and preferably by telephone) of the positive results. Once the parent/guardian/custodian is notified, the student will then be informed of the positive results. The designee will then provide a written notification to the parent/guardian/custodian via U.S. mail.

#### Can the testing procedure lead to a false positive?

No. Any non-negative screen is verified by the laboratory with GC/MS which will give the digital fingerprint of drug. In other words, poppy seeds will never show up as marijuana. The Medical Review Officer (a physician that has special training in drug testing) also reviews each test to insure the proper procedures are used as well as ruling out prescriptions etc.

#### What if a student has a prescription medication? Will that show up as a positive test?

No. It will initially show up as a non-negative. Then the lab will verify the drug. Then the Medical Review officer will see if there are any other factors, especially prescriptions, that could cause the non-negative. If there is a prescription then it will be reported as negative, unless there is an amount of the particular drug in excess of what the prescribed amount would normally indicate. Nothing happens to the student during this process.

#### Can test results be challenged?

Yes. If a parent disputes the result, the same sample can be retested at the same lab or a different certified lab. The cost would be incurred by the parent if the result is the same. If the result was different, Great Lakes Biomedical would incur the cost. It takes a couple of days for the re-test to occur. If the result was different and indicates a negative result, the student will not be disciplined in accordance with the policy. If the result was different, but indicates a non-negative result, the school may retest the sample at a different certified lab. If the re-test is negative or non-negative, no discipline will issue; if the re-test is positive, the student will be disciplined in accordance with this policy.

#### Will the screening results appear anywhere on my student's permanent record?

No. A cumulative student file will contain only an academic transcript, attendance records, educational testing records, parental contact information and required health information. Records related to the student's drug and alcohol test results and any Guidance or Discipline files are destroyed in accordance with the school's document retention policy. Guidance and Discipline records are not sent to colleges.

# Can additional disciplinary consequences be imposed by a coach/moderator on top of the consequences outlined in the school's policy?

Coaches and moderators have the right to establish and enforce team/club rules and consequences for violations of such rules. However, to ensure the fair and impartial treatment of students who violate this policy, coaches and moderators may NOT impose additional consequences for violation of this policy. The only disciplinary consequences that

are to be applied to students found to be in violation of the parameters of the policy shall be imposed by the school administration, in accordance with the stated consequences outlined in this policy.

# What if a student violates provisions of both The Health and Wellness Program and The Disciplinary Program during his/her tenure at Hoban? How will the consequences be adjudicated, given the two parts of the policy have different consequences?

Combinations of Violations from Health and Wellness Program and Disciplinary Program will be cumulative and assigned based upon the order in which category violations occur. For example, a student with a First Positive from a mandatory random test (The Health and Wellness Program) who then tests positive for a reasonable suspicion test (The Disciplinary Program) will be subject to consequences of a Second Positive offense under the guidelines of the Disciplinary Program.

Likewise, a student with a First Positive from a reasonable suspicion test (The Disciplinary Program) who then tests positive during a mandatory random test (The Health and Wellness Program) will be subject to consequences of a Second Positive test under the guidelines of The Health and Wellness Program.

# Can I seek help from Hoban if I am concerned that my son/daughter has a problem with alcohol or drugs?

**Yes, absolutely!** Parents/guardians are encouraged to seek help from Hoban if they are concerned about their son/daughter using drugs or alcohol. <u>Self-referrals by a parent, guardian or student will be treated as a counseling issue</u> unless the reporting is related to a disciplinary incident or disciplinary probation as outlined in Part II of the drug and alcohol policy.

# What is the difference between a "self-referral" and "self-admission"?

A "self-referral" is a provision under The Health and Wellness Program (Part 1) that allows a student to seek help prior to testing positive on a random drug or alcohol test. It occurs when a student asks a counselor, administrator, or any other school personnel for help and an assessment prior to any known violations of the policy. A self-referral may only happen prior to a student being notified that he/she must submit to a random test. A student may utilize a self-referral only once in four years. Additional information regarding a "selfreferral" is found within the policy.

"Self-admission" is a provision under The Disciplinary Program (Part 2) that allows a student to be honest about his/her drug or alcohol use away from school when confronted by the school's administration. "Self-admission" is defined as an admission by a student to the school administration that he/she has recently used or possessed drugs/alcohol. A student may self-admit at any point prior to the time that he/she is given notice to complete a reasonable suspicion drug test (i.e. when he/she is asked questions directly relating to an incident/event at which drugs/alcohol may have been present to or in use by students). A student may not self-admit after he/she is asked to complete a test based on reasonable suspicion of alcohol/drug use relating to an incident/event at which drugs/alcohol may have been present to or in use by students.

# Why are there different consequences for "self-admission" and "non-self-admission" violations under The Disciplinary Program?

Under the school's previous drug and alcohol policy, there was no way to determine whether or not students who were identified as being present in an environment where drugs or alcohol were also present had consumed such substances. Because of this reality, it was incumbent upon the students to volunteer such information about themselves. The result was that students who were honest about their drug/alcohol consumption were penalized, while those who may not have been honest were exonerated. This situation created a culture that rewarded dishonesty and punished those who told the truth.

Under the new guidelines of The Disciplinary Program (Part 2), the reasonable suspicion testing provision enables the school to determine which students choose to consume drugs or alcohol and which students refrain from such consumption when in the presence of such substances. The different consequences associated with "self-admission" vs. "non-self-admission" violations attempt to reward students who are honest about their usage prior to being asked to submit to a reasonable suspicion test. Likewise, those students who are dishonest to the school's administration and have their claims refuted by reasonable suspicion test results face more stringent consequences than those who choose to tell the truth. It is the school's hope that this provision is another step in helping to form truthful students and create a culture of honesty within the school community.

# Why doesn't Hoban completely remove all co-curriculars from students who test positive for drug/alcohol use? Wouldn't that be a greater deterrent?

While recognizing that co-curricular activities are privileges, Hoban also acknowledges the supportive role that teammates/club members play and the structure that team sports/club involvement provide in the overall development and wellness of individuals going through personal struggles. As such, while consequences for violations of this policy may involve the forfeiture of participation in public representation, outside competition and participation in co-curricular activities, it is the school's belief that maintaining one's involvement as a team or club member through practices or similar engagement is beneficial to the overall wellness of the student.