

Distribution of the DAAPP

Common Pitfalls that become Violations for Institutions

Has your institution stumbled into a pitfall?

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1. The Institution Made No Direct Distribution of the DAAPP.

- Simply printed their **Drugs and Alcohol Prevention Program (DAAPP)** in the Student Handbook, Catalogue/Class schedule and /or posted it to their Website/Bulletin Board.
- The Department has stated that merely making the materials available to those who wish to take them does not satisfy the requirements of the regulations, as that does not ensure distribution to every student and employee.
- The institution must describe what it does to ensure distribution to all students and employees in order to establish compliance with the regulations.
- Institutions are required to **actively distribute** the DAAPP. Acceptable means of delivery include regular United States mail, hand delivery, or campus mail distribution to the individual or posting on the institution's website.
- If an institution chooses to distribute its DAAPP to an internet or intranet site, the institution must distribute a notice to all students and employees that includes a statement of the DAAPP's availability at **its exact electronic address**, and a **description of its contents**.

2. Electronic Notification

- Electronic notification was made; however, the institution failed to keep a copy of e-mail with the distribution list on it.
 - If the institution chooses this type of distribution, they must keep a copy of all email notifications for this policy as evidence of its distribution.
- Electronic notification was made but not all students/employees have an institutional email account.
 - Large institutions may opt to send a notification of the DAAPP to all new students and employees. This notification must include a brief description of what the DAAPP is and a direct link to the Policy. This system works well if everyone has an institution email account. However, if everyone is not required to have an e-mail account, the institution will most likely end up with some of the students/staff not receiving the required information.
 - The institution must devise a plan to ensure that its distribution includes everyone and may need more than one type of distribution activity to meet this requirement.

3. In Person Distribution

- A hand distribution was made to all new students and employees; however, the institution has no records of receipt.
- Many small institutions that do not have a large IT Department and a large e-mail system opt to have all of their first time students and employees attend an orientation where they will hand each individual a packet that includes the DAAPP information. This method is fine, but incomplete unless the institution has each individual acknowledge the receipt by signing for it. These acknowledgments must be kept by the institution as evidence of proper distributions for a Program review.

4. Distribution of DAAPP Was Only Made at Orientation.

- Orientation:
 - In this example, the institution was able to make an annual distribution to all new students and employees in August at the start of their Fall Semester.
 - Although acceptable, the regulation also requires that all students and employees receive an **annual distribution** of the DAAPP as well. Providing the written annual notification to students when they start school or to employees only at the beginning of their employment does not meet the requirement that it be distributed annually.

5. Distribution of the DAAPP Was Only Made Annually.

- In this example, the institution felt that it had fully complied by providing an annual notification to all its student and staff at the start of their academic year, typically in August.
- However, they forgot that sometimes a new student will start in the next semester or a student enrolls from another institution while they are home for the summer for just one course.
- The institution may also have seasonal workers who were not at the school when the annual distribution occurred. For example, they may have a visiting professor who only taught a summer course. These individuals must also receive the DAAPP.

6. The Institution Uses the US Mail/e-mail to Distribute its Notices

But fails to follow up on return mail.

- According to the regulations, if an institution uses mailing as a means of distribution and the mailing to a particular student/employee is returned, the institution should use the method it normally would to locate and deliver a mailing to a particular student/employee under those circumstances. The same would be true for those institutions that use an email notification and receive a returned message as undeliverable.

SUMMARY

- The institution must develop procedures for **ensuring** that the DAAPP program materials are distributed to every student who is currently enrolled for academic credit (excluding continuing education credits) and all employees.
- The distribution plan must make provisions for providing the DAAPP disclosure **annually** to students who enroll at a date after the initial distribution and for employees who are hired at different points throughout the year.
- The institution must be able to provide **documentation** evidencing their distribution.