

Purpose

EDP University of Puerto Rico Inc., fulfilling its commitment to promote safe and healthy environments for its students and employees, established its Campus Security and Crime Prevention policy to achieve a university community free from the manufacture, distribution, possession, or use of controlled substances or alcohol abuse by students and employees. EDP University seeks to foster a vibrant academic and service-oriented community dedicated to the pursuit of truth and the encouragement of the fullest realization of the human being in all its dimensions.

Our institution complies with the Drug-Free Workplace Act of 1988¹, the Drug-Free Schools and Communities Act of 1989², and Law No. 40 of 1993, as amended by Law No. 29 of June 7, 2022, known as the Law to Regulate Smoking in Certain Public and Private Places. A drug-free work environment is necessary for the academic community to effectively carry out their respective tasks. We have enacted a policy applicable to the entire population of EDP University, including all employees and students, which establishes the institutional position on the use of alcohol, other drugs, and controlled substances, and which also defines the resources and procedures available to individuals in the event of possession, use, or abuse of controlled substances within the academic community. Copies of the policy are available from the Office of Student Affairs or the Information Resources Center.

STANDARDS OF CONDUCT

The manufacture, dispensing, illegal possession, use, production, or illegal distribution of controlled substances, tobacco (including vaping products, electronic cigarettes, smokeless tobacco, and any device that simulates smoking), and alcohol by employees, students, visitors, and organizations is prohibited both on the Institution's premises and at official activities held off campus. Law No. 40 of 1993, as amended by Law No. 66 of March 2, 2006, prohibits smoking in all public and private areas, including educational institutions. In accordance with this law, EDP University will not allow the use of tobacco or tobacco-derived products in any institutional space, including classrooms, offices, hallways, outdoor areas, parking lots, and institutional vehicles. This includes vaping and e-cigarettes, due to their health risks similar to traditional

¹ Drug Free Workplace Act (41 U.S.C. 81)

² Drug-Free Schools and Campuses Regulations (34 CFR 84); (34 CFR 86)

tobacco, such as nicotine addiction and exposure to toxic chemicals. Clear signage will be installed throughout the campus to remind everyone of this prohibition.

Exceptions for Alcohol at Official Events

A limited use of alcoholic beverages will be permitted at official activities and/or those sponsored by recognized organizations of the Institution, upon request and with the corresponding written authorization from the Chancellor. Limited use shall be understood as: (1) the exclusion of advertisements regarding the product's availability, (2) the wide availability of other products and non-alcoholic beverages, (3) the distribution of food at the same event, and (4) the control of beverage distribution, including the requirement of photo identification with date of birth to verify that alcohol is not distributed to persons under 18 years of age.

It is prohibited to use or report to work or study under the influence of any controlled substance. It is prohibited to use or report to work or to study under the influence of any controlled substance, whether prescribed or not, that causes or may cause the employee or student to be in an unsafe condition during work or study hours on the Institution's premises or at Institution-sponsored activities. An unsafe condition is one that endangers workplace safety, whether one's own or that of fellow employees.

Law No. 40 of 1993, as amended, prohibits smoking in public and private educational institutions at all levels of instruction. In the application of the law, EDP University will not allow smoking in classrooms, auditoriums, game rooms, libraries, offices, hallways, childcare centers, areas containing flammable liquids, vapors, or materials, and any other unspecified premises. Student organizations recognized by the University, as well as visitors and guests, are subject to the foregoing provisions. This law was amended by Law No. 66 of March 2, 2006, to make the prohibition total, covering all public spaces, whether in public or private establishments. Therefore, EDP University will not allow smoking on the Institution's premises, including outdoor hallways and the parking area.

HEALTH-RELATED RISKS

"Controlled substance" shall mean any chemical substance that in any way alters the functioning of the body, mind, and nervous system, behavior, and/or feelings of individuals. They are classified under Schedules I through V of Section 812 of the Controlled Substances Act (21 U.S.C.

§ 812) and under the Puerto Rico Controlled Substances Act, Law No. 4 of June 23, 1971, as amended.

Alcohol use disorder (AUD) is a medical condition characterized by an impaired ability to stop or control alcohol use despite adverse social, occupational, or health consequences. It encompasses the conditions that some people know as alcohol abuse, alcohol dependence, alcohol addiction, and the colloquial term, alcoholism. Considered a brain disorder, AUD can be mild, moderate, or severe. The use or abuse of alcohol, tobacco, and controlled substances may result in personal, emotional, physical, and/or legal problems. Even in small doses, it affects mental functions, such as the ability to learn or remember information. Other associated consequences include respiratory problems, depression, and death. Frequent or prolonged use of alcohol, tobacco, or other drugs may result in physical and/or psychological addiction.

Environmental tobacco smoke (ETS) refers to the smoke emitted from a cigarette, pipe, or cigar, plus the smoke exhaled from the smoker's lungs. Exposure to it is known as involuntary smoking or passive smoking. Passive smoking is a significant risk factor for illness and death, and the third most preventable cause of death after active smoking and alcoholism.

Tobacco use is the leading cause of lung cancer deaths; it also damages the heart and blood vessels, weakens the immune system, increases the likelihood of developing type 2 diabetes, and makes managing and controlling this condition more difficult. Smoking during pregnancy increases the chances of having a premature baby, causing birth defects, and low birth weight; later, if the baby is exposed to secondhand smoke, their risk of dying from sudden infant death syndrome increases. Tobacco use is associated with five of the top six causes of death in Puerto Rico in 2019. These are heart disease, malignant tumors, diabetes mellitus, Alzheimer's disease, and chronic lower respiratory diseases.³

Education and Wellbeing Support

EDP University promotes ongoing health and wellness education through activities coordinated by the Psychosocial Support Center (CAPS, by its Spanish acronym), which is part of the Dean of Student Affairs. CAPS offers workshops and educational resources on the risks associated with

³ Marrero Gerena, G., Ramírez A. L., Ruiz Serrano, K., Felici Giovanini., Díaz García, R. & Cases Rosario, A., (Abril 2021), Lo que todos deben saber del tabaquismo en Puerto Rico, Programa de Control de Tabaco, Programa de Prevención y Control de Enfermedades Crónicas, Departamento de Salud

substance use, such as alcohol, tobacco, and drugs, and can refer students to external rehabilitation services when necessary.

The university actively participates in initiatives of the Interuniversity Educational Consortium (C.R.U.S.A.D.A.), including the CORE Study on student lifestyles. As part of its educational efforts, information campaigns, orientation sessions for new students and employees, and support resources for those in recovery are planned. These initiatives are disseminated through institutional channels to ensure they reach the entire university community.

DISCIPLINARY SANCTIONS

Any violation of this Policy by employees and/or students will result in disciplinary sanctions, which may include suspension and/or expulsion/termination of contract. The Family Educational Rights and Privacy Act (FERPA) allows institutions of higher education to notify the parents of underage students who violate the aforementioned legal provisions and institutional public policy. The notification will be made through the Dean of Student Affairs.

The disciplinary sanctions to be imposed will be consistent with the procedures described in both the Student Handbook and the Employee Handbook. These sanctions may include, but are not limited to:

1. A labor or disciplinary action in accordance with the severity/incidence of the offense.
2. Serve a probationary period.
3. Suspension.
4. Termination of employment.
5. Any of the first three options, combined with a referral to the staff in charge of the Drug, Alcohol, Tobacco, and Violence Prevention area at our institution.
6. In the case of students- expulsion, suspension, probation, reprimand, restitution, compensation, community service, withholding of diploma, limitation of participation or enrollment in any institutional activity or program, including classes and/or graduation.

A student who is convicted of any offense under applicable state or federal laws for the possession or sale of controlled substances shall not be eligible to receive any scholarship, loan, or employment assistance (Work-Study Program) during the period beginning on the date of conviction and ending after the interval specified below.

Eligibility Period	Possession of controlled substances	Sale of controlled substances
<i>First offense</i>	1 year	2 years
<i>Second offense</i>	2 years	Indefinite
<i>Third offense</i>	Indefinite	Indefinite

Employee rules:

1. An employee who commits any of the following offenses will be subject to termination of employment for the first offense:
 - Using or reporting to work under the influence of controlled substances.
 - Possess, sell, distribute, or use controlled substances on the Institution's premises or property during work hours or at Institution-sponsored activities.
 - Using or reporting to work under the influence of any controlled substance. It is prohibited to use or report to work under the influence of any controlled substance, whether prescribed or not, that causes or may cause the employee or student to be in an unsafe condition during work or study hours on the Institution's premises or at Institution-sponsored activities. An unsafe condition is one that endangers workplace safety, whether one's own or that of fellow employees.
2. An employee accused of committing a public offense related to controlled substances outside the Institution's facilities and during working hours will be suspended from employment and pay pending the outcome of the criminal case.
3. Any employee whose conduct or job performance, or any other circumstance, provides reasonable grounds to suspect that they have used or are under the influence of controlled substances will be required to undergo a medical evaluation, including a urine test to detect the presence of controlled substances in their system. Refusal to undergo such examination and/or test shall be grounds for termination. If the examination and/or test reveals a violation of this Rule, the appropriate disciplinary

measure will be applied in accordance with the Employee Handbook or the Faculty Handbook.

PROVISIONS OF THE LAW (PENALTIES)

Any person who violates the applicable legal provisions shall be subject to the state or federal legal sanctions that apply to their case. Some of the related costs or penalties include fines, loss of driver's license, imprisonment, and/or community service. Some of the laws that could be applied, without implying that this list is exhaustive, include:

1. The Controlled Substances Act of Puerto Rico, Law No. 4 of June 23, 1971, as amended, classifies the possession, use, or distribution of substances as a felony and imposes penalties ranging from years of imprisonment to thousands of dollars in fines, or a combination of both, at the court's discretion.
2. The variation in the severity of the penalty will depend on the classification of the controlled substance. The lower the classification (I), the greater the penalty.
3. Prior convictions could result in more severe penalties.
4. The Puerto Rico Penal Code prohibits the sale or distribution of alcoholic beverages to persons under 18 years of age. Penalties include imprisonment, a fine, or both, at the discretion of the Court.
5. The Puerto Rico Vehicle and Traffic Law prohibits driving motor vehicles while intoxicated. For underage drivers, the public policy of zero tolerance is promoted.
6. Municipal ordinances may apply depending on the geographic location of EDP University of Puerto Rico's campuses or university centers.

RECOMMENDATIONS

A referral will be made for the person to voluntarily participate in a counseling/rehabilitation program. Referrals will also be made to government and/or private institutions, as required by the case.

If the person involved does not attend or does not accept the alternative offered, they may participate in an external public or private program, with the commitment to submit evidence of progress and completion of treatment to the appropriate institutional office (the Dean of Student Affairs, the Dean of Academic Affairs, or the Human Resources Office).

DISTRIBUTION

The Human Resources Office will distribute this Policy immediately to newly hired employees⁴ and annually via email to all faculty, non-faculty staff, consultants, and service providers.

The Office of the Dean of Student Affairs and the Directors of University Centers will distribute this Policy via email to all students and make it accessible on the University's website.

COMMUNICATION

Employee Assistance Program

EDP University provides its employees with a confidential Assistance Program focused on substance use and overall well-being. This program is offered thru MCS Solutions in collaboration with First Health Care (FHC). The services provided by mental health professionals include:

- **Mental health care services:** Help maintain the balance between the individual and their sociocultural environment, promoting better participation in work, intellectual pursuits, and relationships.
- **Treatment for controlled substance abuse:** Prevention and assistance in detecting controlled substance abuse, to help the individual and their family members.
- **Employee Assistance Program (EAP, by its Spanish acronym):** A work-focused intervention program aimed at preventing, early identification, and resolving emotional problems that adversely affect employee performance.

This service is available on a voluntary basis or by institutional referral, with no impact on employment status except in cases of policy violations. This program complements the support

⁴ Regardless of whether they are hired as regular employees or under a professional services contract.

resources available to the student community. The office that serves as the liaison for these services is Institutional Human Resources, available at the following number:

Phone number: (787) 765-3560 Ext. 2281 y 2261

Student Assistance Program

Likewise, prevention activities and/or workshops are held for students. These address topics related to the health risks associated with the use and abuse of drugs, alcohol, and tobacco products. During these activities, educational prevention materials are distributed.

Among the services available through the Counseling Office are:

- Individual Counseling
- Psychological services
- Self-awareness
- Development of self-esteem
- Interpersonal relationship management
- Stress management (personal, family, financial, educational)
- Conflict resolution
- Referrals to external services

The offices for this program, which serve as a liaison to other services offered by the Institution and the community, are located on the first floor of our institution, in the Dean's Offices of Student Affairs:

Hato Rey Campus
Telephone - (787) 765-3560, Ext. 2394

San Sebastián Campus
Telephone – (787) 896-2252, Ext. 3235

Manatí Branch Campus
Telephone – (787) 621-3652 Ext. 4003

Humacao Branch Campus
Telephone – (787) 719-2236 Ext. 5006

Villalba Branch Campus
Telephone – (787) 588-0003 Ext. 6008
Caguas Branch Campus
Telephone – (787) 653-4343 Ext. 8060

Program Review

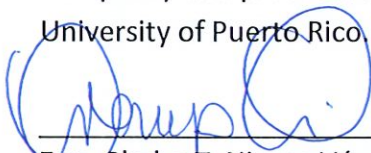
Every two years, EDP University reviews its substance prevention program to ensure it is functioning effectively. This evaluation includes anonymous surveys, analysis of participation in educational activities, and incident reviews. Based on the findings, improvements are proposed and a summary is shared with the university community thru institutional channels.

The review is coordinated by the AVP for Institutional Compliance, the Dean of Student Affairs, Branch Campus Directors, and Human Resources, and is conducted in even-numbered years. Significant changes are communicated in a timely manner.

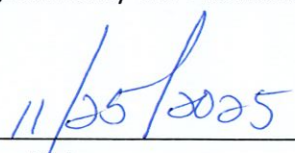
NOTE

You can obtain a printed copy of the **Policy and Program for a University Community Free of Alcohol, Tobacco, and Controlled Substances** at the Office of the Dean of Students or the Office of Orientation and Counselling.

This policy and procedure shall take effect immediately upon signature by the President of EDP University of Puerto Rico.



Eng. Gladys T. Nieves Vázquez
President
EDP University of Puerto Rico



Date