

# **COE COLLEGE BIENNIAL REVIEW**

## **DRUG-FREE SCHOOLS AND CAMPUSES ACT REPORT (DFSCA)**

### **August 2022**

Coe College is committed to preventing the illegal use of alcohol and other drugs (AOD) on campus. In accordance with the Drug-Free Schools and Campuses Act (DFSCA), Coe College completes a biennial review on its AOD prevention programs at the end of every even numbered year. This report covers the 2020-2021 and 2021-2022 academic years.

#### **Description of AOD program elements**

Coe College policies regarding drugs and alcohol can be found in the College and Employment Policies (<https://www.coe.edu/why-coe/discover-coe/human-resources/faculty-staff-resources>) and in the Student Handbook (<https://www.coe.edu/student-life/student-life-resources/college-policies-student-handbook>). These policies are mainly enforced by the professional Student Life Staff, Campus Security Officers, and Assistant Directors of Residence Life (ADs), and Resident Assistants (RAs). The Student Life Staff, Campus Security, and ADs/RAs receive annual training on AOD policies and protocols prior to the start of the fall semester. The Assistant Directors and Resident Assistants then review the AOD policies with students living in their communities at the start of every academic year.

All first-year students at Coe College engage in online training modules on alcohol and other drugs prior to their arrival on campus. During the '20-'21 and '21-'22 academic years, the online program used was Alcohol & Other Drugs through Vector LMS. Alcohol & Other Drugs is a reality-driven online course designed to educate students on the risks of the abuse of alcohol and other drugs, and to teach successful strategies for handling dangerous situations related to these substances... Each section provides extensive, research-backed evidence of the detrimental effects alcohol and other drugs can have, and how social skills and interactions can help reduce harm associated with these substances" ([safecolleges.com](http://safecolleges.com)). . The program is designed to give Coe's incoming students a learning experience that: a) motivates behavior change; b) resets unrealistic expectations about alcohol; c) connects choices about drinking to academic and personal success; d) encourages safer decision-making; and e) promotes a healthier campus community.

In addition, in 2018 and 2019, Coe implemented the "StepUP!" Bystander Intervention program. The StepUP! Program is a prosocial behavior and bystander intervention program that educates participants to be proactive in helping others. The goals of the program are to raise awareness of helping behaviors, increase motivation to help, learn strategies and develop skills and confidence when responding to problems or concerns, and to ensure the safety and well-being of self and others

Members of the Coe College Title IX Team also train all student athletes about sexual assault prevention at the start of the year through in-person presentations. Part of this training covers the topic of capacity and a person's ability (or not) to consent to sexual activity due to alcohol or drug use. Discussion includes talking about individual responsibility when deciding to initiate sexual contact, meaning a person cannot use alcohol or drug use as an excuse for failing to get consent from a partner and engaging in misconduct. Discussion also covers how it is never okay to sexually take advantage of someone who is incapacitated due to alcohol or drug use. All student athletes, coaches, and training staff attend these sessions.

Coe College has a Student Conduct Manager that is assigned the task of conducting trainings on campus policies for the different members of the campus community; including new faculty and staff, student leaders, first-year students, student athletes and coaches, Greek organizations, etc. Many of the trainings conducted focused on sexual assault prevention and response, and AOD topics were woven into these conversations. Again, an important concept of sexual assault prevention is discussing the topic of capacity and a reasonable person's ability to make informed, rational decisions. Understanding capacity is a part of every training on sexual assault prevention.

In addition to hosting trainings, the Conduct Office expanded their partnership with Vector Solution LMS to provide additional training and sanctions for students around alcohol and other drugs. When engaging with the programs, students are able to reflect on their own AOD use and then learn about potential effects (academic, financial, physical, emotional, interpersonal, etc.) that AOD use can have on their present and future. These programs were assigned in an

effort to provide additional education and reduce recidivism.

### **AOD Program Goals and Outcomes**

- Students will be able to understand the difference between high-risk drinking behaviors and the responsible use of alcohol.
- Students who are over 21 years of age will be able to establish a plan for responsible decisions around alcohol and engage in healthy practices.
- Students will know on-campus and community resources available when facing challenges with AOD use and/or abuse.
- Students will understand the role AOD has on mental health, physical health, finances, incidents of sexual misconduct, interpersonal relationships, decreased academic performance, etc.
- Campus culture will be one of safety and responsibility.

### **AOD Program Strengths and Weaknesses**

Coe College is continually finding opportunities to engage in educational, preventative conversations with all members of the campus community (students, faculty, and staff). This includes online programming for incoming students prior to their arrival on-campus and continues in the form of in-person trainings that are held with different groups, in different settings throughout the year. In addition, the College has focused on adding new resources to AOD efforts in the form of new professional personnel (the Student Conduct Manager) and new online programming (in partnership with Vector Solutions LMS). While the College endeavors to prevent misconduct before it occurs, our community is also committed to investing in these sorts of resources to reduce (and eliminate) incidents of recidivism for violations of AOD policies and misconduct, in general. These investments are a clear strength of the AOD program at the College.

In terms of Clery-reportable alcohol and drug violations, there were 45 alcohol referrals, 40 drug referrals, and 1 drug arrest in the 2020 calendar year. In addition, there were 25 alcohol referrals and 18 drug referrals in the 2021 calendar year. There was a decrease in both alcohol and drug referrals from 2020 to 2021. This could be due to fewer restrictions in regard to the pandemic, allowing students to participate in more campus events and alternatives to drug and alcohol use. There was an increase in alcohol referrals from 2018 (22) and 2019 (41) to 2020. There was also an increase in drug referrals from 2018 (29) and 2019 (25) to 2020. Both of these increases correlate with the hiring of a professional staff member to oversee conduct behavior, awareness, and prevention; perhaps increasing reporting and accountability efforts. The office of Student Conduct will continue to educate students about alcohol and other drug policies and state laws.

### **Distribution of Annual AOD notification**

The AOD policies and information are housed in the College Policies document, which applies to all members of the Coe College community (all students, faculty, and staff). In addition, student-specific AOD policies and procedures are housed in the Student Handbook. Both documents (College Policies and Student Handbook) are available on the Coe College website and members of the Coe College community are reminded of these policies and their locations online at the start of each academic year.

The College Policies can be found using the following link:

- <https://www.coe.edu/why-coe/discover-coe/human-resources/faculty-staff-resources>

The Student Handbook can be found using the following link:

- <https://www.coe.edu/student-life/student-life-resources/college-policies-student-handbook>

### **Recommendations for the Future**

- Continue to have increased security and professional staff presence during the first two weeks of the academic year.
- Continue to distribute and explain AOD policies to students during move-in.

- Continue to have increased security and professional staff presence at large events where alcohol is present (i.e., Homecoming Dance, President's Ball, and Flunk Day).
- Find ways to enhance education for faculty and staff regarding AOD policies and resources.
- Utilize the [conduct@coe.edu](mailto:conduct@coe.edu) email account to send more regular email reminders about AOD policies and offer creative ways to review policies, such as incentivized quizzes, etc. · Offer additional programming that provides education on AOD use and healthy behaviors.
- Find opportunities to present more AOD-specific presentations to key groups on campus (students leaders, athletes, Greek orgs., etc.).
- Find opportunities to collaborate with student organizations and other departments on campus for AOD-specific initiatives
- Create more marketing materials and promo items on AOD policies and healthy behaviors.
- Continue to seek out collaborations with local, state, and national organizations related to AOD.

## **ALCOHOL AND OTHER DRUGS POLICIES**

Updated: July 2022

### **Alcohol and Other Drugs Policy**

To comply with the Drug Free Schools and Communities Act of 1989 (DFSCA) and subsequent amendments, Coe College students are informed that policies are in place, which prohibit the possession, use, and/or distribution of any illicit drugs on Coe College property or as a part of any Coe College-sponsored activity (unless specific permission is given for students of legal age to consume alcohol moderately). Coe College students are also subject to all applicable legal sanctions under local, state, and federal law for any offenses involving illicit drugs or alcohol use on Coe College property or at Coe College-sponsored activities.

Coe College affirms that illegal drug use is unlawful and harmful. The use of illegal drugs and/or alcohol abuse by students could result in cognitive deficits, loss of productivity, and other health risks. These risks include an increased risk of accidents, which may result in death or permanent injury. Free, confidential counseling for alcohol and other drug abuse issues is available to students through Coe College's counseling services and Coe College Health Services. Other resources may include assessment, individual counseling, educational programs, materials, and referral to community agencies, all of which might include a fee.

### **Philosophy of Alcohol and Other Drugs Policy**

Coe College opposes the illegal use and/or misuse of alcohol and other drugs in the college environment because of the serious problems related. Illegal use and/or misuse of alcohol and other drugs can lead to a loss of effectiveness in human life and can hinder the educational process. Therefore, Coe College urges all students to exercise mature judgment and social responsibility when making decisions regarding the use of alcohol and other drugs.

In compliance with state and federal laws, Coe College prohibits the unlawful possession, use, manufacture, or distribution of alcohol and/or other drugs by students. Students who violate the alcohol and other drugs policy will be subject to disciplinary action.

### **On-Campus Alcohol Guidelines and Policies for Students**

Coe College is committed to maintaining an environment conducive to the intellectual and personal development of students and to the safety and welfare of all members of the Coe College community. Students are expected to make responsible decisions regarding the use of alcohol personally and at organizational events both on and off campus. This includes encouraging responsible drinking habits by those individuals who choose to drink and respecting the rights of those individuals who choose not to drink. These guidelines apply to all forms of alcohol including, but not limited to liquid, vapor, or powder.

### **Coe College students are required to observe and abide by the following expectations:**

- Students under 21 years of age shall not possess, distribute, or consume alcohol anywhere on Coe College property or at a Coe College-sponsored event. Students under 21 years of age that are found to be in possession of alcohol shall have their alcohol confiscated and will be subject to the Conduct Process.
- Students who are 21 years of age or older are permitted to possess and consume alcohol within the privacy of

their own room, provided that the door remains closed.

- Students must be 21 years of age or older to host, formally or informally, any activity that includes alcoholic beverages.
- Students who are 21 years of age or older may not provide or otherwise share alcohol with persons who are under 21 years of age.
- Students who are 21 years of age or older may not provide or otherwise share alcohol with persons who are intoxicated.
- Alcohol is not permitted in public areas of the residential living spaces (including, but not limited to: restrooms, hallways, stairwells, elevators, lounges, chapter rooms, patios, balconies, etc.).
- Alcohol is not permitted outdoors on campus (unless at an approved campus event by officials).
- Alcohol is to be transported in covered, opaque packages when brought on-campus.
- Students are prohibited from possessing or using kegs and kegerators in all campus residences, campus buildings, and campus grounds.
- Alcoholic beverages in containers greater than one gallon are prohibited on campus.
- Common source mixtures of alcohol are prohibited due to the potential danger of unknown alcohol content or presence of other substances.
- Drinking activities that employ peer pressure are prohibited. Prohibited activities, include but are not limited to: chugging, drinking games (example: beer pong, flip cup, Do or Drink, etc.), etc. Drinking activities that force the consumption of alcohol are considered dangerous and therefore are not allowed.
- Drinking games with non-alcoholic beverages (ex: water pong, etc.) are prohibited.
- Alcohol may not be used as an incentive or award at social events or college activities.
- Student activity fee funds may not be used to purchase alcohol.

Failure to observe or abide by any of the above listed requirements and expectations will result in disciplinary action through the Student Conduct Process. In addition, please be reminded that Coe College students are responsible for adhering to all local, state, and federal laws. Coe College will not and cannot protect students from the consequences of violating these statutes.

### **Social Function Guidelines and Policies for Students**

All student social functions have basic expectations and guidelines. Due to the increased liability at social functions where alcohol is present, there are additional expectations. Social functions where alcohol is present shall meet the following guidelines:

- Social functions may only be held in the following locations: college owned houses and apartments and the TKE house.
- Social functions may only be held on Friday or Saturday evenings (after 6:00 p.m.).
- Should students wish to hold a social function at another time, this must be approved by a Residence Life Professional staff member or another higher-level administrator.
- All approved social functions must end by no later than 2:00 a.m.
- Social functions may not be held during May Term, Summer Term, or when classes are not in session (i.e. Thanksgiving Break, Winter Break, Spring Break, etc.). Further, social functions may not be held during Finals Week or on the weekends for Admissions Campus Visit Days.
- Coe College reserves the right to prohibit students from hosting or attending social functions during other specified times. Examples include: in the case of local, state, or national emergencies; public health crises; etc.
- All students who reside in the location of a social function must attend a Risk Management Session led by a Residence Life Professional staff member or another higher-level administrator prior to having a social function approved.
- The host(s) of a social function will not provide alcoholic beverages to their guests. Regarding alcohol, all social functions will be considered BYOB (bring your own beverage).
- The host(s) and sober host(s) will provide an ample supply of snacks, water, and other non-alcoholic beverages for their guests.
- All alcohol present at a social function must remain in the approved apartment or house. Alcohol is not permitted in public spaces of the building, including, but not limited to: public restrooms, hallways, stairwells,

lounges, chapter rooms, patios, balconies, etc.

- Students are prohibited from charging entrance to a social function or charging for snacks and water.
- Advertising for a social function and emphasizing the presence or use of alcohol is prohibited
- All social functions must have at least one host. Hosts must:
  - be full-time students enrolled at Coe College;
  - live in the apartment or house where the function is to be held;
  - be at least 21 years of age if alcohol will be present at the function;
  - have attended a Risk Management Session led by a Residence Life Professional staff member or another higher-level administrator
- All social functions must also have at least one sober host. Sober hosts:
  - must be full-time students enrolled at Coe College;
  - do not have to be a resident of the apartment or house hosting the social function;
  - must have attended a Risk Management Session led by a Residence Life Professional staff member or another higher-level administrator;
  - must be present and cannot consume alcohol before and/or during the social function
  - Please note: The host and the sober host can be the same person, provided they are a resident of the apartment or house that is hosting the function, they do not consume alcohol before and/or during the event, and they are 21 years of age or older.
- The host(s) must:
  - Register the event –To register the event, please fill out the Social Event Registration Form before 9:00 a.m. on the Friday prior to the function. All students serving as host(s) or sober host(s) for the function must be notified of their roles and be aware of their responsibilities for the event.
- The sober host(s) must:
  - Monitor the entrances to the function to prevent uninvited guests from entering.
  - Please note: Students who are present at a function and are not listed as approved party attendees may be held responsible through the college conduct process and disciplined as appropriate.
  - Monitor the number of guests at the function to ensure occupancy does not exceed the fire code capacity of the particular facility.
  - Provide ample snacks, water, and other non-alcoholic beverages for all guests for the duration of the event.
  - Help maintain order and ensure responsible behavior.
  - Ensure all persons are capable of safely returning to their place of residence.

Due to fire code capacities, social functions in these apartments may not exceed 15 people;

- All College-Owned Houses
- E Avenue Apartments
- 4-Plex
- 8-Plex
- Hampton Court Apartments

Due to fire code capacities, social functions in these apartments may not exceed 30 people:

- Brandt House
- Morris House
- Schlarbaum House
- Spivey House

### **Additional Guidelines for Other On-Campus Student Events**

- All on-campus events with alcohol must be registered as social functions with the Dean of Students, Director of Campus Life, or their designee.
- Event hosts are required to review College Risk Management guidelines.
- Third-party vendors such as Sodexo shall be used for the purchase and serving of alcohol.
- The host(s) of the event is responsible for ensuring alcoholic beverages do not enter the event if such use has not specifically been permitted.
- The host(s) of the event is responsible for clean-up of any garbage and recycling. Clean-up should take place at the conclusion of the event.
- Security must be present at all campus events, aside from apartment/house social functions.

### **Illegal Substance Policies for Students**

Illegal drugs are not permitted on Coe College property. Institutional knowledge of the possession, use, distribution, sale,

and/or manufacture of any drug will subject the involved student(s) to investigation and the disciplinary process.

**The following actions are prohibited according to the Coe College Illegal Substance Policy:**

- Misuse of over-the-counter drugs.
  - Misuse or sharing of prescription drugs.
  - Improper use of any prescription medication, including the use of prescription drugs without a prescription or consuming prescription medication in excess of what a provider has prescribed. Such improper use will be interpreted as illegal drug use.
  - Possessing, using, and/or being under the influence of any form of illegal drug.
  - Distributing and/or selling any form of prescription drug or illegal drug.
  - Manufacturing and/or selling any form of prescription drug or illegal drug.
  - Possessing paraphernalia (i.e., rolling papers, pipes, bongs, etc.) for intended or implied use of any form of illegal drug.
  - Possessing paraphernalia that contains or appears to contain illegal drug residue.
  - Purchasing or passing prescription drugs or illegal drugs from one person to another.
  - Using mail services (including campus mail services) to purchase, pass, or distribute prescription drugs or illegal drugs.
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- Please note: cannabis products are considered illegal in Iowa.
  - Please note: If a student is confronted for the smell and/or sight of drugs on-campus, that student can be found responsible for a policy violation. For example, if a student is confronted for the smell of cannabis on their person or in their room, that student may face charges and be found responsible for violating college policy.

Evidence that a student has engaged in any of the activities listed above will result in disciplinary action through the Student Conduct Process. In addition, please be reminded that Coe College students are responsible for adhering to all local, state, and federal laws. Coe College will not and cannot protect students from the consequences of violating these statutes.

**Civil Laws and Sanctions Regarding Alcohol and Other Drugs**

**Alcohol Laws** – Iowa State Code states that it is unlawful for any person to “sell, give, or otherwise supply any alcoholic beverage to any person knowing or having reasonable cause to believe that person to be under legal age... and “a person or persons under legal age shall not purchase or attempt to purchase, consume, or individually or jointly have alcoholic beverages in their possession or control” The law further states that “a person under legal age shall not misrepresent the person’s age for the purpose of purchasing or attempting to purchase any alcoholic beverage from any liquor control licensee or wine or beer permittee.” Penalties range from a simple misdemeanor to a serious misdemeanor. In Iowa the legal drinking age is 21.

**Drug Laws** – Iowa State Code states that it is unlawful for any person not authorized by Chapter 124 of the state code “to manufacture, deliver, or possess with intent to manufacture or deliver a controlled substance, a counterfeit substance, or to act with, enter into a common scheme or design with, or conspire with one or more other persons to manufacture, deliver or possess with intent to manufacture or deliver a controlled substance, a counterfeit substance, a simulated controlled substance, or an imitation controlled substance.” Penalties range from a simple misdemeanor to a felony. For greater detail of these laws, see Chapters 123 and 124 of the Iowa State Code.

The federal law with respect to drug abuse prevention and control may be found in Title 21, Chapter 13, of the United States Code. A number of different penalties (sanctions) may be imposed by the magistrate or other representatives of the civil judicial system. Penalties include criminal charges, ranging from a simple misdemeanor to a felony. Sentencing may include one or more of the following: monetary fines, incarceration, and community service. Penalties may be different for persons under or over the age of 18 years old.

Persons under 18 who violate drug and alcohol laws may be turned over to juvenile authorities or are dealt with through the court system. Persons over 18 are dealt with through the court system. Persons over 18 who are charged with the use or possession of illegal drugs are treated as adults. Fines, jail sentences, and community service are at the discretion of the magistrate or district court judge.

**Health Risks with Alcohol and Other Drugs**

People who abuse alcohol or drugs risk damage to both their mental and physical health including, but not limited to:

<b>Alcohol and Other Drugs</b>	<b>Health Risks</b>
<b>Inhalants:</b> Solvents, Aerosols, Thinner, Paint, Lighter Fluid, Gas	liver, nerve, brain damage; heart failure; respiratory arrest; coma; suffocation; death
<b>Narcotics:</b> Heroin, Morphine, Codeine, Methadone	pulmonary edema; convulsions; respiratory arrest; coma; death
<b>Depressants:</b> Alcohol, Benzodiazepines, Barbiturates, Chlorohydrins	nausea; severe anxiety; agitation; hallucinations; tremors; shakes; delirium; convulsions; death
<b>Stimulants:</b> Methylphenidate, Cocaine, Phenmetrazine, Amphetamines	convulsions; hypertension; coma; cardiac arrests; pulmonary edema; death
<b>Hallucinogens:</b> Cannabis, LSD, PCP, MDMA, Mescaline, Psilocybin	paranoia; delusions; psychosis; hallucinations; convulsions; flashbacks; death

These examples are not intended to be all-inclusive. It is recommended that you consult your physician for a more extensive description of health risks associated with the use of substances such as nicotine, caffeine, depressants, and stimulants. Related pamphlets on health risks are available in the Health Services Office in the Lower PUB.

Appropriate action will be taken within thirty (30) days of the college's notice of conviction or violation of the college's policy on a drug-free workplace.

The College has a commitment to assist members of the Coe community with treatment of chemical dependency in terms of referrals to appropriate treatment agencies. Students seeking confidential assistance should consult counseling services, Tanager Place, or Health Services.

### **Biennial Review Procedures**

Pursuant to the Drug-Free School and Communities Amendments of 1989, these policies and related programs will be reviewed every two years for compliance. The materials developed pursuant to these policies and the results of the biennial review will be made available to the Secretary of Education if the college is selected in a random selection by the Secretary for determination of compliance. In addition to circulating these policies to all students and employees, policies relevant to the Drug-Free Workplace Act will be posted in public areas of the college.

### **Standards of Conduct for Employees**

Coe College promotes a work environment free of drugs and alcohol, and employees have the right to perform their duties with unimpaired co-workers. To this end, the college has developed a policy to address and to comply with the Drug-Free Workplace Act of 1988. As a condition of employment, the faculty and staff members agree to abide by the terms outlined in this policy.

All Coe College faculty and staff are notified that the unlawful manufacture, distribution, dispensation, possession, or use of a controlled substance is prohibited in the workplace. The workplace is defined as the site(s) where the performance of work is done in connection with one's specific employment. To assist in compliance with the Drug-Free Workplace Act, the following positions will be filled by the listed Coe College faculty member:

- Drug-Free Workplace Program Administrator: Lead Human Resources Officer
- Drug-Free Workplace Referral Agent: Director of Health Services
- Contractor for Counseling Services: Health Advocate's Employee Assistance Program

To assist employees in broadening their knowledge of the harmful effects of controlled substances, and in the treatment of alcoholism or addition to controlled substances, Coe College will use faculty and staff meetings, email communications and other avenues to make employees aware of the following:

- The dangers of drug abuse in the workplace
- Coe's policy of maintaining a drug-free workplace
- The services of the Employee Assistance Program
- Faculty and staff development training in substance abuse
- The penalties that may be imposed for drug-free workplace policy violations

In addition to a written policy, the College will provide comprehensive counseling and support services to employees in need. Employees are encouraged to seek assistance for alcohol and/or drug dependencies. The college assures that all information about participation in a rehabilitation program will be treated in a confidential manner.

## Resources

### On-Campus Resources for Alcohol and/or Drug Concerns

Health Services .....	319-399-8617
<i>Provide referrals to local hospitals and medical specialists. Offer educational materials and provide campus wellness programs.</i>	
Counseling Services .....	319-399-8843
<i>Provide counseling and brief psychotherapy to students. Provide crisis intervention for students in distress.</i>	

### Off-Campus and Community Resources for Alcohol & Other Drugs

Alcoholics Anonymous.....	319-365-5955
The Fellowship Club (Alcohol).....	319-364-03149
Area Substance Abuse Council.....	319-390-4611
Sedlacek Treatment Center.....	319-362-6226
National Council on Alcoholism Information Line.....	1-800-NCA-CALL
National Institute on Drug Abuse .....	1-800-622-HELP

### Off-Campus & Community Resources for Mental Health

Abbe Center for Community Health.....	319-398-3562
Foundation 2 Crisis Center (Suicidal Ideation) .....	319-362-2174
Linn County Mental Health Access Center.....	319-892-5612
Olson Marriage & Family Clinic.....	319-368-6493
Tanager Place.....	319-286-450
Mental Health Emergency Hotline.....	988

## Sanctions for Employee Misconduct

In situations where there is a reasonable cause to suspect that an employee is in violation of the alcohol and drug policy, an appropriate investigation may be made by the program administrator. If upon completion of the investigation, the employee is found to have violated the policy, that employee can be subject to any one or a combination of the following educational and/or disciplinary sanctions:

- Required participation in Employee Assistance Program
- Required participation in an in-patient substance abuse rehabilitation program as determined by the appropriate EAP agent
- Required attendance at designated staff development or other substance abuse education program
- Disciplinary action, including: reprimand, suspension, or termination

All employees have the right to appeal the sanctions to the president of the college. Appeals must be made within five (5) business days of notice of sanctions.

In situations where the college does not suspect a problem, but one exists, the employee may contact the EAP directly and expect confidential treatment (without college involvement or knowledge).

All employees will notify the head of their department of any criminal drug statute conviction occurring in buildings, facilities, grounds, or property controlled by the college within five (5) business days after such conviction. The appropriate college official will, in turn, notify the applicable federal agency of the conviction.

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