

DSDT DRUGS AND ALCOHOL POLICY

DSDT provides a drug-free environment for its faculty, staff and students. The unlawful possession, use, distribution, dispensation, sale, or manufacture of drugs or alcohol is prohibited on DSDT campuses premises, and at any DSDT school activities. No employee or student is to report or return to work or any company activity while under the influence of drugs or alcohol. For purposes of this policy, a conviction includes a plea of guilty or of nolo contendere.

TESTING POLICY & PROCEDURES

Drug and Alcohol testing may be conducted on a random basis; if DSDT believes that an employee or student has been observed possessing or using a prohibited substance on the job; when DSDT reasonably believes that any employee or student may be affected by the use of drugs or alcohol and that they use may adversely affect performance or the environment, or when DSDT reasonably believes that an employee or student is impaired during working or school hours or while engaged in school business, or a school sponsored activity; and any employee or student who has had a positive drug or alcohol impairment test may be subjected to periodic, random testing, for a period of one year from a positive Drug or Alcohol impairment test.

The following testing methods and procedures will be followed:

- Testing will ordinarily be conducted during, immediately before or immediately after regularly scheduled work or school hours. For current employees, time spent in testing and in traveling to and from the regular work site to the place of testing, is work time.
- Whenever a Drug or Alcohol impairment test is done at the request of DSDT pursuant to this policy, the school will pay the actual costs of the testing. In addition, when testing is done at locations over than the school facility, the school will pay reasonable transportation costs for the travel to and from the site to the testing location.

Testing shall be conducted under the following conditions:

- Sample collection shall be performed under reasonable and sanitary conditions;
- Sample collections shall be labeled in such a way as to reasonably preclude the possibility of misidentification of test results;
- Prior to testing, the individual shall be provided with an opportunity to notify DSDT of any information relevant to the test;
- Sample collection, storage, and transportation, where necessary shall be performed in a manner reasonably designed to preclude the possibility of sample contamination adulteration, or misidentification.
- Sample testing will be done in such a way as to comply with scientifically accepted analytical methods and procedure, and by a laboratory approved or certified by, at least, one of the following: United states Department of Health and Human Services, College of American Pathologist or a state department of health and human services.
- Upon the written request of the individual, a positive Drug test result shall be confirmed by a subsequent test, using a different chemical process than used in the initial drug screen. A chromatographic technique or another comparably reliable analytic method will be conducted confirming results.

Employee and Student Testing Rights

- Employees and students have the right, upon written request, to obtain a copy of the written test results.
- DSDT will not release information relating to testing, including test results, to any third parties except upon written authorization of the employee or student, or when legally compelled to do so.

Refusal of Testing

Refusal to participate in Drug or Alcohol impairment testing when requested to do so, or refusal to accept the terms and conditions of testing as specified in this policy, may result in disciplinary action, up to and including termination from DSDT. If applicable, prospective employees or students who refuse to undergo Drug or Alcohol impairment testing are not eligible for hire or admission (respectively).

Please direct any questions, concerns, or reports regarding this policy to the School Director.

DSDT's Policy on Consumption of Alcoholic Beverages on Campus

The use or possession of alcoholic beverages is expressly prohibited in classrooms, lecture halls, laboratories, the libraries, and within buildings or arenas where events, lectures, and meetings are held. The use of alcoholic beverages is expressly prohibited in all public areas of campus buildings. For employees only, social activities held off-premises and paid for on a personal basis are generally not affected by this policy. If management considers it appropriate and approves of such use in writing, alcoholic beverages may be served at company-sponsored events held off-premises and for purely social reasons.

Michigan State Alcohol Laws

Under Michigan law, it is illegal for anyone under the age of 21 to purchase, consume, possess or have any bodily content of alcohol. The following summarizes some of the potential legal consequences for violating state law:

A first-time conviction may result in a fine, substance abuse education and treatment, community service and court-ordered drug screenings.

There also is a provision for possible imprisonment or probation for a second or subsequent offense.

The use of false identification by minors in obtaining alcohol is punishable with a fine, loss of driver's license, probation and community service.

Individuals can be arrested and/or convicted of operating a vehicle while intoxicated with a blood alcohol concentration (BAC) level at .08 or higher. If a student is under 21, there is a "zero tolerance" law in the state of Michigan, and any blood alcohol level of .01 or higher can lead to a minor in possession (MIP) citation as well as being cited for operating a vehicle while intoxicated, if applicable. This is in addition to suspension of driving privileges in the state of Michigan.

Consumption and Possession of Marijuana

All students, employees, and visitors are on notice that the Michigan Medical Marijuana Act (MMMA) and the Michigan Regulation and Taxation of Marijuana Act (MRTMA) conflicts with federal criminal laws governing controlled substances, as well as federal laws requiring institutions receiving federal funds, by grant or contract, to maintain drug-free campuses and workplaces. DSDT participates in federal grant programs which would be in jeopardy if those federal laws did not take precedence over state law. Thus, the use, possession, or cultivation of marijuana in any form and for any purpose on DSDT's property or premises violates the DSDT Drug and Alcohol Policy. DSDT will not allow the use, possession, or cultivation of marijuana or marijuana paraphernalia on its property or DSDT-controlled premises, even if a student, employee, or visitor has been properly certified as a medical marijuana user. Students, employees, and visitors will be asked to remove or dispose of their marijuana from DSDT's property and premises immediately. Furthermore, the MMMA and MRTMA states that employers are not required to accommodate employees who use medical marijuana; therefore employers have the right to refuse employment to anyone who fails a drug test. Additionally, the State of Michigan prohibits a person from undertaking any task under the influence of marijuana, when doing so would constitute negligence or professional malpractice, as in many areas of the medical field. As a result, drug testing may be required at any time by a prospective employer consistent with the laws of the State of Michigan and the requirements of potential employers.

FEDERAL PENALTIES FOR SCHEDULE I, II, III, IV, AND V DRUGS

Production of these drugs is controlled. Examples include GHB, heroin, methaqualone, all hallucinogens (except PCP, marijuana and hashish), and THC, which can also be a Schedule II drug, depending on its form. Schedule II drugs have a high potential for abuse, but have some medical uses. Production of these drugs is controlled. Examples include opium, morphine, codeine, other narcotics, barbiturates, cocaine, amphetamines, PCP, and OxyContin. Federal criminal penalties for selling Schedule I and II drugs vary with the quantity of the drug and whether the individual has the drug for personal use or for sale. Criminal penalties are more severe if sale or use of the drug results in death, if drug use is tied to sexual assault, or for repeat offenses. Federal penalties for Schedule I, II, III, IV and V (except marijuana) are set forth in the attached Schedule A.

Federal penalties for marijuana, hashish, hashish oil, and Schedule I substances are set forth in the attached Schedule B. Schedule III, IV and V drugs include those most citizens would categorize as "prescription drugs." Schedule III drugs have some potential for abuse but less than those on Schedules I and II. The potential for abuse of Schedule IV drugs is less than those on Schedule III, and the potential for abuse of Schedule V drugs is less than those on Schedule IV. All Schedule III to V drugs have medical uses and their production is not controlled. Examples of these drugs include some narcotics, barbiturates, depressants, amphetamines, and other stimulants. Penalties for sale of these drugs depend on whether it is a first offense or repeated offense (see Schedule A).

SCHEDULE

A

Federal Trafficking Penalties for Schedules I, II, III, IV, and V (except Marijuana)

Schedule	Substance/Quantity	Penalty	Substance/Quantity	Penalty
II	Cocaine 500-4999 grams mixture	First Offense: Not less than 5 yrs. and not more than 40 yrs. If death or serious bodily injury, not less than 20 yrs. or more than life.	Cocaine 5 kilograms or more mixture	First Offense: Not less than 10 yrs. and not more than life. If death or serious bodily injury, not less than 20 yrs. or more than life.
II	Cocaine Base 28-279 grams mixture		Cocaine Base 280 grams or more mixture	
IV	Fentanyl 40-399 grams mixture	Fine of not more than \$5 million if an individual, \$25 million if not an individual.	Fentanyl 400 grams or more mixture	Fine of not more than \$10 million if an individual, \$50 million if not an individual.
I	Fentanyl Analogue 10-99 grams mixture		Fentanyl Analogue 100 grams or more mixture	
I	Heroin 100-999 grams mixture	Second Offense: Not less than 10 yrs. and not more than life. If death or serious bodily injury, life imprisonment. Fine of not more than \$8 million if an individual, \$50 million if not an individual.	Heroin 1 kilogram or more mixture	Second Offense: Not less than 20 yrs. and not more than life. If death or serious bodily injury, life imprisonment. Fine of not more than \$20 million if an individual, \$75 million if not an individual.
I	LSD 1-9 grams mixture		LSD 10 grams or more mixture	
II	Methamphetamine 5-49 grams pure or 50-499 grams mixture		Methamphetamine 50 grams or more pure or 500 grams or more mixture	
II	PCP 10-99 grams pure or 100-999 grams mixture		PCP 100 grams or more pure or 1 kilogram or more mixture	2 or More Prior Offenses: Life imprisonment. Fine of not more than \$20 million if an individual, \$75 million if not an individual.
Substance/Quantity		Penalty		
Any Amount Of Other Schedule I & II Substances		First Offense: Not more than 20 yrs. If death or serious bodily injury, not less than 20 yrs. or more than Life. Fine \$1 million if an individual, \$5 million if not an individual.		
Any Drug Product Containing Gamma Hydroxybutyric Acid		Second Offense: Not more than 30 yrs. If death or serious bodily injury, life imprisonment. Fine \$2 million if an individual, \$10 million if not an individual.		
Flunitrazepam (Schedule IV) 1 Gram				
Any Amount Of Other Schedule III Drugs		First Offense: Not more than 10 yrs. If death or serious bodily injury, not more than 15 yrs. Fine not more than \$500,000 if an individual, \$2.5 million if not an individual.		
		Second Offense: Not more than 20 yrs. If death or serious injury, not more than 30 yrs. Fine not more than \$1 million if an individual, \$5 million if not an individual.		
Any Amount Of All Other Schedule IV Drugs (other than one gram or more of Flunitrazepam)		First Offense: Not more than 5 yrs. Fine not more than \$250,000 if an individual, \$1 million if not an individual.		
		Second Offense: Not more than 10 yrs. Fine not more than \$500,000 if an individual, \$2 million if other than an individual.		
Any Amount Of All Schedule V Drugs		First Offense: Not more than 1 yr. Fine not more than \$100,000 if an individual, \$250,000 if not an individual.		
		Second Offense: Not more than 4 yrs. Fine not more than \$200,000 if an individual, \$500,000 if not an individual.		

SCHEDULE

B

Federal Trafficking Penalties for Marijuana, Hashish and Hashish Oil, Schedule I Substances	
<p>Marijuana 1,000 kilograms or more marijuana mixture or 1,000 or more marijuana plants</p>	<p>First Offense: Not less than 10 yrs. or more than life. If death or serious bodily injury, not less than 20 yrs., or more than life. Fine not more than \$10 million if an individual, \$50 million if other than an individual.</p> <p>Second Offense: Not less than 20 yrs. or more than life. If death or serious bodily injury, life imprisonment. Fine not more than \$20 million if an individual, \$75 million if other than an individual.</p>
<p>Marijuana 100 to 999 kilograms marijuana mixture or 100 to 999 marijuana plants</p>	<p>First Offense: Not less than 5 yrs. or more than 40 yrs. If death or serious bodily injury, not less than 20 yrs. or more than life. Fine not more than \$5 million if an individual, \$25 million if other than an individual.</p> <p>Second Offense: Not less than 10 yrs. or more than life. If death or serious bodily injury, life imprisonment. Fine not more than \$8 million if an individual, \$50million if other than an individual.</p>
<p>Marijuana 50 to 99 kilograms marijuana mixture, 50 to 99 marijuana plants</p>	<p>First Offense: Not more than 20 yrs. If death or serious bodily injury, not less than 20 yrs. or more than life. Fine \$1 million if an individual, \$5 million if other than an individual.</p>
<p>Hashish More than 10 kilograms</p>	<p>Second Offense: Not more than 30 yrs. If death or serious bodily injury, life imprisonment. Fine \$2 million if an individual, \$10 million if other than an individual.</p>
<p>Hashish Oil More than 1 kilogram</p>	<p>Second Offense: Not more than 30 yrs. If death or serious bodily injury, life imprisonment. Fine \$2 million if an individual, \$10 million if other than an individual.</p>
<p>Marijuana less than 50 kilograms marijuana (but does not include 50 or more marijuana plants regardless of weight)</p>	<p>First Offense: Not more than 5 yrs. Fine not more than \$250,000, \$1 million if other than an individual.</p> <p>Second Offense: Not more than 10 yrs. Fine \$500,000 if an individual, \$2 million if other than individual.</p>
<p>1 to 49 marijuana plants</p>	
<p>Hashish 10 kilograms or less</p>	
<p>Hashish Oil 1 kilogram or less</p>	