

INTERNATIONAL AIR and HOSPITALITY ACADEMY, INC.
ACADEMY PROPERTIES, INC.

**MAINTAINING A DRUG and ALCOHOL FREE
SCHOOL, RESIDENCE, AND WORKPLACE**

POLICY / PROCEDURE AND RESOURCE HANDBOOK
FOR
STUDENTS AND EMPLOYEES

March 2011

**INTERNATIONAL AIR and HOSPITALITY ACADEMY, INC.
ACADEMY PROPERTIES, INC.**

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**INTERNATIONAL AIR and HOSPITALITY ACADEMY, INC.
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INTRODUCTION

International Air and Hospitality Academy and Academy Properties are committed to providing its employees and students a safe and trouble free environment in which to work and learn. It also affirms the Company's commitment to maintaining a drug- and alcohol free workplace and school, and is in keeping with the industry's zero tolerance stance on these issues in compliance with the Federal Drug Free Workplace Act of 1988 and the Drug-Free Schools and Community Act Amendment of 1989 (Public Law 101-226).

For the purpose of this policy, the term **Company** is all-inclusive and without differentiation when referencing International Air and Hospitality Academy, Inc., Northwest Culinary Institute, Inc., and Northwest Renewable Energy Institute, Inc. and/or Academy Properties, Inc. (Student Housing).

This Policy Handbook is designed to answer questions employees and students may have about the Company's policy on drug and alcohol use in the workplace, student housing, and school. It also provides information concerning resources available to employees and students for obtaining assistance for drug and alcohol dependency.

Employees are required to acknowledge the receipt of the handbook. By signing the acknowledgment on the back page, they affirm that they have read and will to abide by the policy. The signed receipt will be placed in the employee's company file.

The handbook will be distributed to all students on Orientation day. By signing and dating the back of the registration form, they acknowledge they received the handbook and understand the policy. . This form will be filed with the students' education records.

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DRUG and ALCOHOL POLICY STATEMENT

The Company has a responsibility to its employees, students, and the public to insure a safe school and work environment. In accordance with the Drug-Free Schools and Community Act Amendments of 1989, Public Law 101-226, The Company and its facilities are hereby declared a drug and alcohol free school, student residence, and workplace. Accordingly, students and employees are prohibited from;

- reporting for school or work under the influence of intoxicants or illegal drugs, or with the odor of intoxicants about their person. For the purposes of the policy, "school/work" shall include lunch and rest periods. Students and employees must also refrain from the use of intoxicants for a reasonable period of time before their shift or class commences.
- the manufacture, distribution, dispensing, or possession of a controlled substance or intoxicants on company premises or property, including grounds, parking area, student housing, within the school buildings, classrooms or off-site training facilities, or while participating in school- related activities.

Violation of this policy will result in immediate disciplinary action, which may include termination of employment, expulsion from the academic program, and/or eviction from student housing.

In our sole discretion we reserve the right to remove employees or students from the premises for the apparent use of drugs or intoxicants. Should evidence warrant sending a student or employee home, we will arrange for the safe transport by taxicab at their own expense. Should the employee or student leave operating a motor vehicle, the local law enforcement agency will be called immediately.

The Company reserves the right to require drug testing of anyone suspected of being under the influence of intoxicants or a controlled substance. The Company will determine location of the testing facility.

The Company reserves the right, with or without notice, to inspect and/or search all Company property, as well as a student's or employee's personal property on Company premises, for intoxicants, controlled or illegal substances or any other substance that impairs job performance. Refusal to submit to such inspection or refusal to cooperate in any investigation will subject the student/employee to disciplinary action which may include immediate suspension from school and/or loss of Placement Assistance pending negative drug test, or dismissal/termination.

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STEPS FOR DISCIPLINARY ACTION

Disciplinary action will be taken if convincing evidence or Reasonable Suspicion exists to warrant such action against the individual. Evidence regarding the use or possession of illegal drugs or intoxicants includes but is not limited to:

- The odor of intoxicants about the person
- Physical symptoms of drug or alcohol use
- Significant and recent change in an individual's behavior, job/academic performance or attendance
- Possession of alcohol, illicit drugs, drug paraphernalia, or alcohol containers

The Observable Behavior and Investigative Guidelines (OBIG-Appendix A) identifies the step- by-step observation necessary to secure the eyewitness and physical evidence supporting a Reasonable Suspicion and may result in search of property and removal from the premises.

Disciplinary sanctions may include eviction, expulsion, or termination of employment. For each infraction, the following steps will be followed.

Under the influence or in possession of illicit drugs and/or alcohol or in possession of alcohol containers or drug paraphernalia:

- **First offense:** Written warning, probation. An "N" (needs improvement) will be entered into the student's responsibility evaluation. Probation will be for the entire length of enrollment.
- **Second offense:** Written notice of probation, suspension, expulsion from school and/or eviction from Student Housing. Probation will be for the entire length of enrollment.

Under certain circumstances, and on an individual basis, a student may be required to undergo professional assessment, at their expense, in order to remain in student housing and/or enrolled in class on probationary status.

The "N" (needs improvement) can only be expunged if there are no further infractions. Repeat infractions of any kind will result in conference with the School Director and/or President of Academy Properties for the purpose of outlining conditions and requirements necessary to remain enrolled at International Air and Hospitality Academy and/or continued residence in Student Housing. Parents may be contacted and advised of problems stemming from Drug and/or Alcohol infractions.

B. Odor of *intoxicants* while in school building

Although the odor of intoxicants does not prove an individual is intoxicated, the odor is Reasonable Suspicion of the consumption of intoxicants.

- **First offense:** Dismissal from classes for the remainder of the day. Absence will be documented as excused. OBIG form will be placed in Student Education File.
- **Subsequent offenses:** Dismissal from classes for the remainder of the day. Absence to be accountable. OBIG form will be placed in Student Education File. The Student will be placed on written Probation. Repeat infractions of *any* kind will result in conference with the School Director/President of Academy Properties for the purpose of outlining conditions and requirements necessary to remain enrolled at International Air and Hospitality Academy and/or continue residency in Student Housing.

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EMPLOYEES ONLY

Enforcement of the policy, disciplinary processes, and sanctions regarding employee infractions are outlined in the "Employee Handbook." As a condition of employment, employees must:

- abide by the terms of this policy ***and***
- notify The Company of any criminal drug statute conviction for a violation occurring in the workplace no later than 5 days after such conviction. INTERNATIONAL AIR & HOSPITALITY ACADEMY, INC. will notify the U.S. Department of Education within 10 days after receiving notice of any employee who is so convicted. ***The Company*** will also take one of the following actions, within 30 days of receiving notice with respect to any employee who is so convicted:
 - a) Disciplinary action against such employee, up to and including termination;
 - b) Require such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved by a Federal, State, local health, law enforcement, or other appropriate agency.

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APPENDIX A – DEFINITIONS

It will be assumed that illicit drugs and/or paraphernalia found in a Student Housing apartment or vehicles belong to all occupants until proven otherwise. For the purpose of this policy, the following definition of terms is provided:

- **UNDER THE INFLUENCE** is defined as any noticeable impairment of the employee/student's mental or physical faculties.
- **CONTROLLED SUBSTANCES** are defined as all substances whose sale, purchase, transfer, use or possession is prohibited or restricted by law, including prescription drugs..
- **OVER-THE-COUNTER DRUGS** are those available without a prescription. In this context, they are limited to those drugs which are capable of impairing the motor skills, attention span, or judgment of an individual.
- **PRESCRIPTION DRUGS** are defined as those drugs prescribed for use by the student or employee by a licensed practitioner/physician or dentist.
- **ILLICIT (ILLEGAL) DRUGS** include but are not limited to the following non-prescription substances:
 - a) Narcotics- opium, heroin, morphine, and synthetic substitutes.
 - b) Depressants- chloral hydrate, barbiturates and methaqualone
 - c) Stimulants- cocaine (and derivatives such as crack) and amphetamines
 - d) Hallucinogens- LSD, mescaline, PCP, peyote, psilocybin, and MDMA
 - e) Cannabis- marijuana and hashish
- **INTOXICANTS** include but are not limited to the following:
 - a) Beer, wine, grain alcohol and liquor.
 - b) Over the counter medication containing alcohol, and other substances which cause intoxication.
- **REASONABLE SUSPICION** as determined by The Company regarding the use or possession of illegal drugs or *intoxicants* includes but is not limited to:
 - a) The odor of intoxicants about the person, physical symptoms of drug or alcohol use, abnormal physical appearance, conduct, coordination or speech
 - b) Significant and recent change in an individual's behavior, job performance or attendance
 - c) Possession of alcohol, illicit drugs, drug paraphernalia, or alcohol containers
- **IN POSSESSION** as determined by The Company means within personal belongings, including but not limited to clothing, vehicle, apartment*, and backpacks, purses and totes.
- **DRUG PARAPHERNALIA** includes but is not limited to:
 - a) All equipment, material and products of any kind, used or intended for use in growing or harvesting, manufacturing, compounding, testing, preparing or introducing a Controlled Dangerous Substance into the human body.
 - b) Drug paraphernalia includes kits, scales, adulterants, sifters, blenders, grinders, spoons, capsules, balloons, water paper, roach clips, pipes and chillers.

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APPENDIX B - STATE AND FEDERAL LAWS

The Company does not proclaim itself to be a Drug and Alcohol Treatment Facility, or an interpreter of Federal, State, or Local law. The following states the basic policy (key provisions) under Washington and Federal Law.

Alcohol:

- The legal drinking age in Washington is 21. Persons under the age of 21 may not consume, purchase or possess alcohol.
- It is unlawful to sell or furnish alcoholic beverages to persons under the age of 21.
- It is unlawful for persons under the age of 21 to misrepresent one's age for the purpose of purchasing alcoholic beverages.
- It is illegal, regardless of age, to possess, consume, manufacture or sell *illicit drugs* including, but not limited to marijuana, narcotics, hallucinogens, amphetamines and barbiturates.
- It is illegal to have an open container of alcohol in a motor vehicle.

Illegal drugs:

- It is unlawful for any person to manufacture, deliver, or possess with intent to manufacture, deliver, or possess with intent to manufacture or deliver, a controlled substance.
- It is unlawful for any person to create, deliver, or possess a counterfeit substance which is classified as a narcotic drug.
- It is unlawful for any person to possess a controlled substance unless the substance was obtained directly from, or pursuant to, a valid prescription or order of a practitioner while acting in the course of his/her professional practice.
- With some provided exception, any person found guilty of possession of forty grams or less of marijuana shall be guilty of a misdemeanor.
- It is unlawful to compensate, threaten, solicit, or in any other manner involve a person under the age of eighteen years in a transaction unlawfully to manufacture, sell or deliver a controlled substance.
- Possession of less than 40 grams of marijuana and possession of drug paraphernalia are misdemeanors in the State of Washington. Possession of more that 40 grams is a felony.
- More severe penalties are provided for persons convicted of providing controlled substances to minors and for repeat offenses.
- Any person who violates this law with respect to a controlled substance which is a narcotic drug, is guilty of a crime and upon conviction may be imprisoned, fined, or both, with such imprisonment and fine determined by the Schedule Classification of the controlled substance. Penalties include imprisonment for up to ten years and fines up to \$25,000.00.

Key Provisions of Federal Drug Law:

- For possession of a controlled substance Federal Law provides for punishments of up to ten years imprisonment and fines up to \$250,000.00.
- Penalties for possession or use of crack cocaine are more severe than for other illegal drugs: imprisonment up to 20 years and fines up to \$250,000.00.
- Personal and real property, vehicles, boats, and airplanes, can be forfeited.
- Federal benefits such as student loans, (See Attachment C) grants, contracts, and professional and commercial licenses may be denied after conviction.
- Revocation of certain Federal licenses and benefits, e.g. pilot licenses, public housing tenancy, etc., are vested within the authorities of individual Federal agencies.

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APPENDIX C - CRIMINAL DRUG CONVICTIONS AND STUDENT LOANS

The Higher Education Amendments of 1998 provides that a student is ineligible for federal student aid if convicted, under federal or state law, of any offense involving the possession or sale of a controlled substance (illegal drugs). The period of ineligibility begins on the date of conviction and lasts until the end of the statutorily specified period. The student may regain eligibility early by completing a drug rehabilitation program or if the conviction is overturned.

The ineligibility periods are as follows:

- Convicted of Possession:
 - First offense – 1 year
 - Second offense – 2 years
 - Third offense – Indefinite

- Convicted of the Sale:
 - First offense – 2 years
 - Second offense – Indefinite

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APPENDIX D – INFORMATION AND ASSISTANCE

The Company is dedicated to the advancement and well being of the population we serve. All students and employees are encouraged to abstain from the use of illegal drugs and irresponsible use of alcohol. Any student or employee who suspects they or someone they know may be at risk is invited to seek advice, referral information, and services.

The Company has designated the Human Resource Coordinator to be a contact person who is available to hear concerns regarding drug and alcohol use, offer referrals, advice and information on drug and alcohol education and available services in the community. Issues discussed with the Human Resource Coordinator will be kept confidential.

SOURCES OF ASSISTANCE

WASHINGTON	
Division of Alcohol and Substance Abuse:	360-438-8200 – or – 1-877-301-4557
Alcohol/Drug 24-Hour Hotline (Washington Only)	800-562-1240
Teen Line	206-722-4222
Alcohol/Drug Information Center of Clark County	360-696-1631
Alcoholics Anonymous	360-694-3870
Al-Anon..(information)	360-693-5781
Alcohol Detox Center	360-696-1631
Narcotics Anonymous	360-690-1144

NATIONAL HOTLINE NUMBERS AND ASSISTANCE GROUPS	
Alcohol & Drug Referral Hotline	800-252-6465
Alcohol Prevention and Treatment	800-729-6686
Al-Anon..(information)	800-344-2666
Child Help – National Child Abuse Hotline	800-422-4453
Crisis Hotline (Referral for Alcohol and Drug Abuse)	800-234-0246
Cocaine Anonymous	800-622-2463
Mothers Against Drunk Drivers	800-438-6233
National Association of Children of Alcoholics	888-554-2627
National Center for Disease Control/AIDS Hotline	800-342-2437
National Council on Alcoholism and Drug Dependence	800-622-2255
National Institute of Drug Abuse (Treatment and referral)	800-662-4357
Students Against Drunk Drivers	800) 787-5
Alcohol & Drug Referral Hotline	XXXXXX

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APPENDIX E - RANDOM DRUG TESTING POLICY

The United States Department of Transportation has mandated random drug and alcohol testing of airline employees in FAA designated safety sensitive positions. (FAA Anti-Drug Plan became effective in 1989 and FAA Alcohol Misuse Prevention Program became effective January 1, 1995.) Random airline tests are conducted throughout the year and are unannounced.

For all airlines and most travel companies, drug tests are administered to all job applicants in final consideration for employment. Applicants who test positive, non-negative, or refuse to submit to a drug test will not be accepted for employment and will be ineligible for future employment consideration with that company. Their name will be entered in to a national data bank as having failed a Department of Transportation Drug Test. Airlines access this data bank during the hiring process as part of the background check.

The FAA has established the minimum random drug and alcohol testing percentage as 25 percent of covered aviation employees for random drug testing and 10 percent of covered aviation employees for random alcohol testing. Because of this, and the fact that International Air and Hospitality Academy students need to understand the importance of a drug free lifestyle, random drug testing is performed to ensure all interviewing students are fit for duty when finalizing employment offers.

Students Subject to Testing - As initiated by all prospective students on the Career Screening Profile and under The Company's published Drug policy, current students will be required to submit to random drug testing.

Safeguards- The Company's policy is intended to comply with all state laws governing drug testing and is designed to safeguard privacy rights to the fullest extent of the law.

Selection - Not all students will be selected for drug testing during their course, and some may be randomly selected up to 3 times. At any given time, 10% of the current student body will be randomly selected. Students will be eligible for random selection in week 6 and thereafter of the Airline Reservations and Airport Services course and week 8 and thereafter of the Airline/Travel Specialist course. Individual Students may be required to provide The Company with negative test results at their own expense if reasonable suspicion as defined in the International Air and Hospitality Academy/Academy Properties Policy/Procedure and Resource Handbook, has been established.

Tested Substances- As with DOT drug testing, The Company's drug testing program is limited to testing for Marijuana, Amphetamines, PCP, Opiates, and Cocaine. Other substances be will not be tested and, if found, will not be reported.

Notice - Testing will be without notice. Those selected for random testing who are absent from class will be required to test at the laboratory location their first day back to class. Transportation will be provided.

Licensed Laboratories - Drug testing required or requested by The Company will be conducted by Concentra Medical Centers, a licensed laboratory.

Notice of Results - If the student is selected to submit to a drug test, The Company will notify the student of the results within 1 hour after it receives them from Concentra. To preserve the confidentiality that The Company strives to maintain, the Student will be notified in person whether the test was negative or non-negative and what the next step is.

Non Negative Test Results - If the Student receives notice that the test results were confirmed to be non-negative, the sample will be sent to Concentra's lab for further testing. The results will be reported to the student and The Company by an independent Medical Review Officer (typically within 24-48 hours). Each case will be assessed on an individual basis by The Company in accordance with the Drug and Alcohol Policy sanctions outlined in the Handbook.

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Refusal / Inability to Test - A student who refuses to be tested will default to have provided a non-negative test. A student unable to test will be determined to have provided a non-negative test. Due to operational needs, The Company plans to limit the normal waiting time for testing to a maximum of one hour.

Adverse Action - If there is reasonable suspicion as to whether a Student is under the influence of, in possession of, or tests non-negative for illegal drugs, the student will be subject to the disciplinary actions outlined in the Drug and Alcohol Policy/Procedure and Resource Handbook.

Confidentiality - The Company will make every effort to keep the results of drug tests confidential. Only persons who need to know the results will have access to them. The student will be asked for their consent before test results are released to anyone else. Be advised, however, that test results may be used in arbitration, administrative hearings and court cases arising as a result of the student's drug testing.

Costs - The Company will pay the cost of any random drug testing that it requires of the student. Drug testing requirements resulting from reasonable suspicion is to be paid by the student. Any additional tests (including re-testing) that the student requests will be paid for by the student.

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APPENDIX F – PROCEDURES FOR BIENNIAL REVIEW OF DRUG AND ALCOHOL PROGRAM

1. A review panel will be established by the school consisting of staff, instructors, students and an outside resource person. The review panel will determine the effectiveness of the program by:
 - examining the written policy for completeness and clarity;
 - examining the procedures for distribution of the written policy;
 - examining statistical documentation showing how students and employees have been effected by or helped by the program.
2. The review panel will ensure that the sanctions are consistently enforced by:
 - examining the written sanctions included in the policy;
 - examining the statistical documentation of violations of the policy and the sanctions that were applied to those violations.
3. The review panel will not violate the privacy of employees or students by examining actual files but will rely on the statistical information provided by ***The Company*** regarding violations and sanctions.
4. The review panel will recommend changes to the policy to improve its effectiveness and to ensure consistent enforcement.
5. The school will maintain all records of the biennial review for three years after the fiscal year in which the review was conducted and make these records available to the Secretary of Education.
6. Last meeting of the panel was held on October 2, 2009. Minutes of the meeting are available upon request. Next Meeting scheduled for October, 2010

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**APPENDIX G - OBSERVABLE BEHAVIOR INVESTIGATIVE GUIDELINES (OBIG)
(For Staff Use Only)**

Dealing with an individual who may be under the influence of drugs or alcohol raises specific concerns and calls for particular observations and evidence. You'll be reacting to an unusual situation and common sense and thoroughness are vital.

The Observable Behavior and Investigative Guidelines is designed as a quick reference to use when you are confronted with an individual who may be in violation of the Drug and Alcohol Policy. If you suspect a student is under the influence of drugs or alcohol, make a note of as many objective symptoms as possible. Look for behavior that is different from normal for the particular person.

- a) Fill out the Observable Behavior form as completely as possible.
- b) If possible, request a member of Management or another employee to witness the individual's condition and conduct the investigation.
- c) A Manager will then conduct the investigation with you as witness. If a Management team member is not available, ask another employee to witness your investigation. Proceed to an area where questioning, using the Investigative Guidelines, can be private.
- d) If the individual is unwilling to cooperate or becomes violent, seek assistance immediately from any other available employee. If the circumstances warrant, call "911" or other designated outside help.
- e) Explain to the individual that you are concerned about his/her behavior, appearance, etc.
 - Conduct the investigation as outlined. NOTE: Do not close your mind to the possibility the person may be ill (perhaps seriously) rather than under the influence.
- f) During your inquiry, you have the right to:
 - Confiscate any evidence such as bottles, flasks, drugs, drug paraphernalia, suspicious substances (e.g., powders, cough syrup).
 - Ask the individual to walk a straight line; touch the tip of their nose with their index finger, recite the alphabet; read, write or copy something, etc.
 - Ask the individual to submit to a search of book bags etc. NOTE: An individual may refuse any search of their person, or belongings. If the person refuses, you will have evidence they may be trying to hide something.
- g) If at any time the individual confesses to being under the influence or in possession of drugs or alcohol, STOP THE QUESTIONING AND MAKE ARRANGEMENTS FOR THE PERSON TO DEPART THE PREMISES (see page 5)
- h) The Manager and/or Human Resource Coordinator will be determine disciplinary actions based on the outcome of the OBIG. Cases will be evaluated on an individual basis.

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**APPENDIX H – REASONABLE SUSPICION CHECKLIST
(For Staff Use Only)**

An employee of the INTERNATIONAL AIR & HOSPITALITY ACADEMY, INC. or Academy Properties must have a Reasonable Suspicion that an individual is currently under the influence of, or impaired by a controlled substance or other drug in order to conduct and document a verbal investigation. For the purpose of this checklist, the word “Normal” means “consistent with previously observed behavior.” If you are unsure about the person’s normal appearance and/or behavior, do **NOT** check “Normal.”

Student/Employee Name:

Class/Department:

The following observations **must** be documented. Circle pertinent items.

Walking	Normal	Holding on	Falling	Staggering	Unsteady	Stumbling	
Standing	Normal	Swaying	Rigid	Unable to Stand			
Speech	Normal	Slurred	Shouting	Slow	Incoherent	Excited	Rambling
	Silent	Profanity					
Actions	Normal	Drowsy	Hostile	Crying	Threatening	Erratic	Disruptive
	Laughing	Calm	Over-excited	Cooperative	Sniffing		
Eyes	Normal	Glassy	Bloodshot	Watery	Droopy	Blank Stare	
	Dilated Pupils	Closed	Constricted Pupils				
Face	Normal	Flushed	Pale	Puffy	Sweaty	Runny Nose	
Appearance	Normal	Change:					
Observations	Nausea/vomiting	Noticeable Weight Loss	Breathing Difficulties	Inattentive			
	Shaking	Confused	Nervous/Paranoid	Bruises	Tremors		
Attendance	Normal	Poor (recently)					
Quality of Work	Normal	Poor (recently)	Poor Attitude				
Smell	None	Intoxicants					
Other Observations							

Observations made by/date/time:

Observations witnessed by/date/time:

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**APPENDIX I - INVESTIGATIVE GUIDELINES
(For Staff Use Only)**

After completion of the Observable Behavior Form, the following should be asked of all individuals suspected of being in violation of the Company's Drug and Alcohol policies:

Name/Age/Class:

Observable Behavior Form completed by:

Date/Time/Location:

1. Are you feeling ill? What are your symptoms?	
2. Are you under a doctor's care? <ul style="list-style-type: none"> • Name and phone number? • Condition being treated? • Date of last visit? 	
3. Are you taking? <ul style="list-style-type: none"> • Name of medication medication? • Name/Phone of Prescribing Doctor? • Date/Time of last dosage? 	
4. Are you taking any non-prescription medication? (List medication)	
5. Have you used any other drugs? (List drugs)	
6. Do you have high/low blood sugar?	
7. Have you used any alcohol/drugs within the last 24 hours? <ul style="list-style-type: none"> • Date/Time? • Type? Amount? Location? 	
8. How frequently do you use alcohol/drugs?	
9. Other comments by individual	
10. Was the student or the student's possessions searched?	

Completed by:

Date/Time

Witnessed by:

Date/Time

Parent/Guardian Notified by:

Date/Time

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APPENDIX J - STUDENT AND EMPLOYEE HANDBOOK RECEIPT

I, _____
(Print Name)

have received and will read the International Air Academy, Inc. / Academy Properties Inc.

**MAINTAINING A DRUG and ALCOHOL FREE SCHOOL, RESIDENCE, AND WORKPLACE
POLICY / PROCEDURE AND RESOURCE HANDBOOK FOR STUDENTS AND EMPLOYEES**

I understand that I am responsible for the information contained therein.

I understand that the International Air and Hospitality Academy, Inc. / Academy Properties, Inc. expect to continue the policies, procedures, and programs outlined in the Handbooks and that The Company also reserves the right to withdraw, revise, or replace all policies, procedures, and programs included in the handbooks at any time.

INTERNATIONAL AIR & HOSPITALITY ACADEMY, INC./Academy Properties, Inc. are aware that alcoholism and, in some instances, the use or past use of drugs may be considered a disability under the Americans with Disabilities Act and state equal opportunity employment law. Nothing in this policy is intended to, or should be interpreted to, violate any disability discrimination law.

Signature:

Date: