Noncompliance:

ASU violated multiple provisions of the DFSCA and the Department's Part 86 regulations. Specifically, the University failed to document its implementation of a comprehensive drug and alcohol abuse prevention program (DAAPP) and distribute an accurate and complete DAAPP disclosure to all employees and enrolled students:

Furthermore, ASU failed to conduct a biennial review in order to: 1) assess the effectiveness of its DAAPP; 2) evaluate the consistency of sanctions imposed for violations of the University's disciplinary standards and codes of conduct related to drugs and alcohol; 3) identify areas requiring improvement or modification; and; 4) produce a report of biennial review findings.

Failure to comply with the DFSCA's DAAPP requirements deprives students and employees of important information regarding the educational, disciplinary, health, and legal consequences of illegal drug use and alcohol abuse. Failure to comply with the biennial review requirements also deprives the institution of important information about the effectiveness of its own drug and alcohol programs. Such failures may contribute to increased drug and alcohol abuse on-campus as well as an increase in drug and alcohol-related violent crime.

Required Action:

As a result of this violation, ASU is required to perform the following:

- Develop, implement, and document a comprehensive DAAPP that includes all of the required elements found in the DFSCA and the Department's Part 86 regulations;

- Develop procedures for ensuring that the DAAPP program materials are documented and distributed to every student who is currently enrolled, and to all employees. ASU is required to provide a draft copy of its DAAPP and new distribution policy with its response to the program review report. Conduct a biennial review to assess the effectiveness of its DAAPP and assess the consistency of sanctions imposed for violations of its disciplinary standards and codes of conduct. ASU must describe the research methods and data analysis tools that are used to determine the effectiveness of the program and identify the responsible official(s) and office(s) that conducted the biennial review. Finally, the biennial review report must be approved by the institution's chief executive and/or its board; and

- ASU must establish policies and procedures ensure that all subsequent biennial reviews are conducted in a timely manner and are fully documented. It also must take all other necessary action to ensure that these violations do not recur. A copy of these new policies and procedures must accompany the University's biennial review report.

As noted above, the exceptions identified in this finding constitute serious violations of the DFSCA that by their nature cannot be cured. There is no way to truly "correct" a violation of this type once it occurs. ASU will be given an opportunity to finally begin to bring its drug and alcohol programs into compliance with the DFSCA as required by its PPA. However, the University is advised that these remedial measures cannot and do not diminish the seriousness of these violations nor do they eliminate the
FINDING 5: DRUG AND ALCOHOL ABUSE PREVENTION PROGRAM REQUIREMENTS NOT MET

...possibility that the Department will impose an adverse administrative action and/or require additional corrective measures.

Based on an evaluation of all available information, including ASU's response, the Department will determine if additional action will be required and will advise the institution accordingly in the FPRD.

ASU RESPONSE:

In the fall of 2014 the University established the Alcorn Substance Abuse Assistance Prevention Program (ASAPP) to centralize already existing programs in order to achieve better efficiency and effectiveness. The ASAPP program description is listed below and followed by copies of other already existing policies related to substance abuse prevention. Two new policies on biennial review and information distribution have been added. Alcorn Substance Abuse Prevention Program is designed to decrease the problems associated with ATOD (alcohol, tobacco & other drugs) use and abuse at Alcorn State University. It targets collegiate students throughout the campus with both evidence-based and non-evidence-based programming. As stated in our response to finding 1, a biennial review will be completed by the end of the fall 2016 semester.

Alcorn Substance Abuse Prevention Program (ASAPP)

The Alcorn Substance Abuse Prevention Program uses several strategies as required by the Center of Substance Abuse Prevention (CSAP) in delivery of Prevention Services:

- Information Dissemination (Brochures & Flyers)
- Affective Education Programs
- Alternative Programs
- Problem/Identification & Referral
- Community-based process (Community Development)
- Environmental Programs

The program is ultimately designed to deter the onset of problematic behavior, including ATOD use and abuse. ASAPP provides outreach to students (college and adult) through classroom settings, educational/informative programs, including classroom instruction, health fairs, seminars; distribution of literature on ATOD and decision-making skills.

Drug and Alcohol Abuse Prevention

Preventing drug abuse and excessive alcohol use improves quality of life, academic performance and workplace productivity; reduces crime and criminal justice expenses; reduces motor vehicle crashes and fatalities; and lowers health care costs for acute and chronic conditions. Excessive alcohol use includes binge drinking (five or more drinks during a single occasion for men, four or more drinks during a single occasion for women), underage drinking, drinking while pregnant, and alcohol impaired driving. Drug abuse includes any inappropriate use of pharmaceuticals (both prescription and over-the-counter drugs) and any use of illicit drugs. Alcohol and other drug use can impede judgment and lead to harmful risk-taking behavior.

As a student/employee, the impact of drug and alcohol abuse focuses on four major issues:

- Premature death/fatal accidents
FINDING 5: DRUG AND ALCOHOL ABUSE PREVENTION PROGRAM REQUIREMENTS NOT MET

- Injuries/accident rates
- Absenteeism/extra sick leave
- Loss of production

Additional problem areas can include:

- Tardiness/sleeping at work or in class
- Theft
- Poor decision making
- Loss of efficiency
- Increased likelihood of having trouble with co-workers/supervisors/teachers or tasks
- Higher turnover/Withdrawal from the University
- Disciplinary procedures

Drug & Alcohol Health Related Risks

Students who engage in risky drinking may experience blackouts (i.e., memory loss during periods of heavy drinking); fatal and nonfatal injuries, including falls, drowning, and automobile crashes; illnesses; missed classes; unprotected sex that could lead to a sexually transmitted disease or an unwanted pregnancy; falling grades and academic failure; an arrest record; accidental death; and death by suicide. In addition, college students who drink to excess may miss opportunities to participate in the social, athletic, and cultural activities that are part of college life.

Employees with alcohol and substance misuse problems require ongoing health support. Not only does it contribute to a loss of productivity, it also causes tremendous costs related to absenteeism, work-related accidents, health care, and a loss of trained personnel. Drug and alcohol abuse causes physical and emotional dependence, which can make users develop cravings. Their bodies may respond in different ways that can cause harm to the individual. Alcohol and drug consumption, even in moderation, can cause changes in the body and behavior. It interferes with the brain’s communication routes, and can affect the way the brain works. These disruptions can alter mood and behavior, and make it difficult to think clearly and move with coordination. Drug and alcohol abuse, over a long time or in excess on a single occasion, can cause problems including:

- Heart Issues (Myocardial Infarction, Cardiomyopathy, Arrhythmia)
- Stroke
- High blood pressure
- Respiratory Issues
- Severe Anxiety & Depression
- Death

High-Risk Drinking in College:
What We Know and What We Need to Learn
www.collegedrinkingprevention.gov
Drug & Alcohol Counseling and/or Treatment Resources
Marian Hill Chemical Dependency Center
1111 N. Frontage Road
Vicksburg, MS 39180
Phone (601) 883-3838 Fax (601) 883-3890

Warren-Yazoo Mental Health Services
3444 Wisconsin Ave.
Vicksburg, MS 39180
Phone (601) 638-0031 Fax (601) 638-4950

Southwest MS Mental Health Complex (Claiborne County)
2090 HWY 61
Box 624 Port Gibson, MS 39150 Phone (601) 437-8185 Fax (601) 437-4888

Southwest MS Mental Health Complex (Adams County)
200 South Wall St.
Box 1442
Natchez, MS 39120
Phone (601) 446-6634 Fax (601) 446-6898

Jefferson County Mental Health Complex
1555 N. Main St.
Box 369
Fayette, MS 39069
Phone (601) 786-8091 Fax (601) 786-8023

For more information and/or assistance on Drug and Alcohol Related Risks, please contact Alcorn Substance Abuse Prevention Program at (601) 877-6230.

Drug Free Policy

It is the policy of Alcorn State University to maintain a drug-free workplace, workforce, and campus consistent with Federal laws as set forth in the Drug-Free Workplace Act of 1988 and the Department of Defense Drug-Free Workforce Rule of 1988 and the Drug-Free Schools and Communities Act Amendments of 1989. Consequently, all employees--faculty, staff (part-time/full-time), and students are absolutely prohibited from the unlawful possession, manufacture, distribution, dispensation, sale, use, or in any way involve themselves with controlled substances and alcohol on University property or as part of any University activity. For the purpose of this policy, the term “Controlled Substances” means those defined in Schedules I through V of section 202 of the Controlled Substances Act [21 U.S.C. 812] and as further defined by regulation 21 CFR 1300.11 through 1300.15.

Any faculty, staff, or student(s) found in violation of the aforesaid policy while on the University’s campus, or while engaged in official University business off campus, shall be required to undergo mandatory assessment for drug abuse. The University reserves the right to prescribe the nature and type of corrective action to be imposed on faculty, staff or students found in violation of the Drug-Free Workplace and Drug-Free Campus...
Policy. Such corrective action may include: 1) issuance of warning, 2) referral for treatment, 3) suspension, 4) termination, 5) expulsion, and/or 6) civil prosecution.

**Notification of Conviction**

It is the policy of Alcorn State University that any faculty or staff member convicted of a controlled substance violation at the workplace is required to notify his or her supervisor or the University President within five (5) work days of such conviction. Failure to comply with this requirement shall result in disciplinary action which may include suspension pending further investigation. It is the policy of the University to comply with Federal law which requires that the University notify the applicable Federal Agencies within ten (10) days after the University has received notification of a controlled substance conviction of any faculty or staff member whose position is federally funded.

It is the expectation of Alcorn State University that all students receiving a Pell Grant will comply with the specific Anti-Drug Abuse Act Certification requirements of the U. S. Department of Education. The requirements are that any student convicted of a drug-related offense, while on Pell Grant, will report the conviction in writing to the U. S. Department of Education within ten (10) days after the conviction.

**Health Risks**

Drugs are designed to produce physical and/or psychological change(s) within the body. However, there are health risks associated with the use of illegal/illicit drugs and alcohol such as:

- Damage to the brain.
- High blood pressure, seizures, strokes, heart attacks, cardiac arrest and/or respiratory arrest.
- Impaired judgment, loss of memory, poor hand and eye coordination and poor concentration.
- Sleep Disturbances, depression, paranoia, and anxiety.
- Physical and psychological dependence.
- Increased risk of HIV infection.
- Painful withdrawal symptoms (tremors, panic attacks, chills, sweating, muscle cramps, etc.).

**General Indicators of Alcohol or Other Drug Abuse**

- An abrupt change in mood or attitude.
- Sudden and continuing decline in school/work attendance and academic/ job performance.
- Sudden and continuing resistance to discipline at home or school.
- Dysfunctional relationships with family or friends.
- Unusual flares of temper or acting-out violent behavior.

**Program Services**

- Alcohol and Other Drug Education
- Audiovisual Materials (Alcohol and Other Dugs)
- Awareness and Information Media Campaigns
- In-Service Training Seminars
- Peer Education (Student-Led Initiatives)

Support Services (Alcohol and other drugs risk screening, confidential counseling and referral)
FINDING 5: DRUG AND ALCOHOL ABUSE PREVENTION PROGRAM REQUIREMENTS NOT MET

From the Student Handbook

DRUGS (ILLEGAL) OR DRUG PARAPHERNALIA
The consumption, sale, distribution, manufacturing, purchase, passing of, or being in the presence of or the vicinity of illegal drugs, narcotics, the accessory to, or aiding and abetting of any controlled substances, are strictly prohibited from all locations of the University according to all local, state, and federal laws. Drug paraphernalia is strictly prohibited at the University. Paraphernalia is defined as all equipment, products, and materials of any kind used to facilitate planting, propagating, cultivating, growing, manufacturing, converting, processing, preparing, packaging, storing, concealing, injecting, ingesting, inhaling, or otherwise introducing a controlled substance into the body.

The scope of this prohibition includes drugs or paraphernalia that is on the person or in the possession of a student on property owned or controlled by the University and/or at events and activities sponsored by the University, and involves related incidents that are subject to prosecution under local, state, and federal laws.

The illegal possession of and/or use of drugs, or drug paraphernalia includes, but is not limited to, roach clips, bongs, masks, scales, balances, sandwich bags or plastic bags and their corners, sifters, syringes, spoons, chamber pipes, homemade pipes, film canisters, diluents, spray cans, carburetor pipes, paint, pipes, using screens, water pipes, and any other equipment, products and materials that can be directly linked to the usage of controlled substances.

PENALTY: Fine $250-$500 + Probation; Counseling; Campus Service; Suspension; Indefinite Suspension; Expulsion

From Human Resources Policies and Procedures Manual

14.9 DRUG-FREE WORKPLACE POLICY
It is the policy of Alcorn State University to maintain a drug-free workplace, workforce and campus consistent with federal laws set forth in the Drug-Free Workplace Act of 1988, the Department of Defense Drug-Free Workforce Rule of 1988 and the Drug-Free Schools and Communities Act Amendments of 1989. Consequently, all employees including faculty, staff (part-time and full-time) and students are absolutely prohibited from the unlawful possession, manufacture, distribution, dispensation, sale or any involvement with controlled substances and alcohol on University property or as part of any University activity.

For the purpose of this policy, the term “Controlled Substances" means those defined in Schedules I through V of section 202 of the Controlled Substances Act [21 U.S.C. 812] and as further defined by regulation 21 CFR 1300.11 through 1300.15.

14.9.1 ALCOHOL AND OTHER DRUGS
Alcorn State University has adopted this policy on drugs and alcohol for its employees and others on University property to help ensure a safe, healthy, and productive drug-free work environment; to protect University property and assets; to maintain a favorable public image; and to ensure efficient operations. This policy restricts certain items and substances from being brought on or being present on University property including its parking areas and its vehicles; prohibits University employees and all others from reporting to work, working or being present on University property from having detectable levels or identifiable
trace quantities of certain drugs and other substances and prohibits the unauthorized possession by employees or others of certain materials.

14.9.2 PROHIBITED ITEMS

The use, possession, sale, manufacture, distribution, dispensation, concealment, receipt, transportation or being under the influence of any of the following items or substances on University property (including the presence of detectable levels or identifiable trace quantities), by employees is prohibited:

- Illegal drugs, controlled substances, marijuana, intoxicants (legal or illegal), “look-alike” substances, designer drugs, counterfeit or synthetic drugs, inhalants and any other drugs or substances that will, in any way, affect safety, work ability, alertness, coordination, judgment, response or the safety of others on the job.

- Alcoholic beverages, except as specifically authorized by University management. (Note: Moderate use of alcohol at company-approved meetings or in an appropriate social setting is not prohibited by this policy.) Consumption of alcoholic beverages while driving or driving any vehicle for University business while intoxicated is prohibited. The consumption of alcohol on University time or on any of Alcorn’s property is prohibited.

- Drug paraphernalia. 11 Human Resources Revised Policies 06172015

- Prescription drugs and over-the-counter medications, except under the following conditions:
  - The drugs have been prescribed by an authorized medical practitioner for current use (within the past 12 months) for the person in possession of the drugs.
  - The drugs/medications, both prescribed and over-the-counter, are limited to a 1-day supply or must be kept in their original container and must be taken in accordance with the dosage recommendations and usage cautions and generally must not affect the person’s ability to perform work safely.
  - The University reserves the right to consult with a medical doctor to determine if a drug or medication, whether prescribed, produces hazardous or non-safe effects and may restrict the use of any such drug or medication accordingly on University property. The University also reserves the right to require an employee to undergo a fitness for duty medical examination by a physician of its choosing. This may also include restricting or altering the individual’s work activity or presence at the worksite.

14.9.3 POLICY ENFORCEMENT

Because of the importance of this policy, the University reserves the right, at all times, while on Alcorn’s premises and property and when circumstances warrant, to have University supervisors and/or authorized search and inspection specialists, including scent-trained dogs, conduct searches and inspections of employees or other persons and their personal property and effects, to include but not be limited to lunch boxes, purses, briefcases, baggage, offices, desks, clothing and vehicles (including trunks, glove compartments, etc.) for the purpose of determining if such employees or other persons are using, possessing, selling, manufacturing, distributing, dispensing, concealing, receiving or transporting any of the prohibited items and substances contained in the policy.
FINDING 5: DRUG AND ALCOHOL ABUSE PREVENTION PROGRAM REQUIREMENTS NOT MET

The employee’s supervisor and/or a senior University officer have the right to conduct an on-the-spot search and inspection of employees or others and their personal property and effects, as described, if said supervisor has a reason to believe that employees or others are in direct violation of any part of this policy. All searches and inspections conducted by outside authorized specialists will be in the presence of a senior company officer and/or the Human Resources Director.

All employees are expected to cooperate with any investigation regarding this policy. Failure to cooperate, provide false information or omit information may subject any employee to disciplinary action up to and including termination of employment. A search and inspection, as defined herein, may also include and require employees and others present on University property to submit to a urine drug screen test and/or blood test or other examination.

Tests/inspections may be required under the following circumstances:

1. During pre-employment examinations for certain positions as identified by the University.

2. When an employee’s supervisor has reason to believe that an employee on University property is using or under the influence of prohibited drugs, alcohol and substances or that there has been a violation of this policy.

3. When an employee, or other person, is found in possession of suspected illegal or prohibited drugs and substances, or when any of these drugs and substances are found in an area controlled or used exclusively by said employee or other person.

4. When an employee returns to active employment after a leave of absence of 30 or more days.

5. Following an on-the-job injury requiring treatment from a physician or following a serious or potentially serious accident or incident, including near misses, in which safety precautions were violated, unsafe instructions or orders were given, vehicles/equipment/property was damaged or unusually careless acts were performed. All persons involved and within the immediate vicinity of the incident may have their urine and blood tested. If it is impossible or impractical, because of the physical condition of the individual(s) involved in the accident, to give a urine and blood sample, and if in subsequent medical treatment of the person or person’s blood will be drawn, then the blood will be analyzed for drugs, alcohol and other prohibited substances.

6. Random testing, other than to meet current specific job site requirements, will not commence until 30 days following the date of this policy; however, applicants for employment shall be subject to testing as of the date of this policy. The search, inspection, urine and/or blood drug screening provisions herein will be performed with concern for the personal privacy of each employee or other person and will also apply to contract labor, when feasible. All persons shall have the opportunity, prior to testing, to list all prescription and nonprescription drugs they have used in the last 30 days and to explain the circumstances surrounding the use of such drugs. All records containing medical information will be maintained in accordance with applicable law. Here is a list of the drugs that are usually tested for and the levels of detection:

<table>
<thead>
<tr>
<th>Drug or Metabolite</th>
<th>Initial Test Cutoff</th>
<th>Confirmation Test Cutoff</th>
</tr>
</thead>
<tbody>
<tr>
<td>In Urine (Emit) (GC/MS) (GC/MS)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Amphetamine (includes Methamphetamine)</td>
<td>1000 ng/ml</td>
<td>500 ng/ml</td>
</tr>
<tr>
<td>Barbiturate</td>
<td>300 ng/ml</td>
<td>300 ng/ml</td>
</tr>
<tr>
<td>Cannabinoid (Marijuana, hashish)</td>
<td>50 ng/ml</td>
<td>15 ng/ml</td>
</tr>
<tr>
<td>Methadone</td>
<td>300 ng/ml</td>
<td>150 ng/ml</td>
</tr>
<tr>
<td>Opiate: Morphine, Codeine</td>
<td>2000 ng/ml</td>
<td>2000 ng/ml</td>
</tr>
</tbody>
</table>
FINDING 5: DRUG AND ALCOHOL ABUSE PREVENTION PROGRAM REQUIREMENTS NOT MET

Methaqualone 300 ng/ml 300 ng/ml
Phencyclidine (PCP) 25 ng/ml 25 ng/ml
Ethanol (Enzyme Assay) (GC/FID) .04/%w/volume .04/%w/volume

14.9.4 PENALITIES FOR VIOLATION OF POLICY

Any employee found in violation of this policy or who refuses to submit to a search or urine and/or blood analysis shall be removed from University property and be subject to disciplinary action, up to and including termination of employment.

Any employee ordered to submit to urine and/or blood tests shall be informed of the reasons why he or she is being ordered to submit the specimen. Any employee failing after a 3-hour period to submit the specimen will be informed that this refusal constitutes failure to obey a direct order and that this is grounds for termination.

Any employee who, as a result of drug testing and screening, is found to have detectable levels or identifiable trace quantities of a prohibited drug or substance in his or her system, regardless of when or where the drug or substance entered that person’s system, without an explanation satisfactory to University, will be considered in violation of this policy, will be removed from University property and will be subject to disciplinary action, up to and including termination of employment. Additionally, if employment is continued, such employees may be required to submit to random drug screens and/or to participate in and successfully complete a substance abuse program. Preliminary findings of a policy violation may require that the employee be suspended, without pay, pending the results of an internal investigation. If said investigation clears the employee of any policy violation, then said employee would be fully reinstated, including pay, to his or her job. An employee, or anyone else, who in any way alters, tampers with, or substitutes a urine or blood specimen, will be considered a violator of this policy, and the employee shall be discharged. A nonemployee shall be removed and barred from University.

The company may take into custody any illegal, unauthorized, or prohibited items or substances and may turn them over to the proper law enforcement agencies.

14.9.5 OFF THE JOB DRUG AND ALCOHOL SUBSTANCE USE AND ACTIVITY

Employees who use drugs, alcohol or chemical substances off the job run the risk of jeopardizing the safety of themselves, their family, the public and the University. Whenever such usage adversely affects public trust in the University or otherwise interferes with the University’s ability to carry out its responsibilities or increases potential liability for the University, the University may be forced to take disciplinary action against the offending employee(s), up to and including termination of employment. Employees who are convicted or plead guilty or novo contendere (no contest) because of off-the-job activities (drug or alcohol related) may be considered in violation of this policy. In deciding what action to take, the University will consider the nature of the charges and other factors relative to the impact of the employee’s conviction or plea upon the conduct of the University’s business. This policy supersedes any and all other University drug policies.

14.9.6 VIOLATION OF ALCOHOL AND DRUG POLICY

14.9.6.1 DETERMINATION

An employee may be found to use illegal drugs on the basis of any appropriate evidence including, but not limited to:

1. Direct observation

2. Evidence obtained from an arrest or criminal conviction

3. A verified positive test result

4. An employee’s voluntary admission
14.9.6.2 MANDATORY ADMINISTRATIVE ACTIONS
The Supervisor may refer an employee found to use illegal drugs to an Employee Assistance Program (EAP), and, if the employee occupies a sensitive position, immediately remove the employee from that position. At the discretion of the supervisor, however, and as part of an EAP, an employee may return to duty in a sensitive position if the employee’s return would not endanger public health or safety.

14.9.6.3 CONSEQUENCES
Disciplinary action taken against an employee found to use illegal drugs may include the full range of disciplinary actions, including termination. The severity of the action chosen will depend on the circumstances of each case and will be consistent with prior discipline under similar circumstances. The supervisor shall initiate disciplinary action against any employee found to use illegal drugs, provided that such action is not required for an employee who voluntarily admits to illegal drug use and obtains counseling or rehabilitation and thereafter refrain from using illegal drugs as long as such admission occurs prior to illegal use or possession on the job. 15 Human Resources Revised Policies 06172015

Such disciplinary action may include any of the following measures, but disciplinary action will be initiated if an employee is found in violation of this policy:

1. Reprimanding the employee in writing.
2. Placing the employee in an enforced leave status.
3. Suspending the employee for 14 days or less (with or without pay).
4. Suspending the employee for 15 days or more (with or without pay).
5. Suspending the employee until the employee successfully completes the EAP or until the supervisor determines that action other than suspension is more appropriate.
6. Terminating the employee.

14.9.6.4 TERMINATION
The supervisor shall terminate an employee for refusing to obtain counseling or rehabilitation through an EAP as required by the drug policy after the employee has been found to have used illegal drugs or does not refrain from illegal drug use after a first finding of such use.

14.9.6.5 REFUSAL OF DRUG TEST
An employee who refuses to be tested when so required will be subject to the full range of disciplinary action, including dismissal. No applicant who refuses to be tested shall be extended an offer of employment. Attempts to alter or substitute the specimen provided will be deemed a refusal to take the drug test required.

Policy on Biennial Review & Information Dissemination of the Substance Abuse Program
It is the policy of Alcorn State University that the Director of Counseling Services is responsible for the biennial review of the substance abuse program at the University, and the proper reporting of data, and recommendations to improve the program. Further, the Director of Counseling Services will insure the annual dissemination of information to the campus community regarding programs and services available regarding substance abuse.

Policy on Review of Disciplinary Sanctions & information Dissemination
It is the policy of Alcorn State University that the Director of Judicial Affairs is responsible for the review of consistency in disciplinary sanctions and, based on the results, making appropriate recommendations where needed. Further, the Director of Judicial Affairs will insure the annual dissemination of information to students about the policies, procedures, rules, and regulations that govern student life in the area of substance abuse.