



UNIVERSITY OF  
**SOUTH CAROLINA**

Drug-Free Schools and Campuses Regulations [Edgar Part 86]

Biennial Review: Academic Years 2016-2017 and 2017-2018

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## Introduction/Overview

*The Higher Education Act of 1965, as amended by the Drug-Free Schools and Communities Act of 1989, requires that any institution of higher education that receives federal financial assistance must adopt and implement a program to prevent the use of illicit drugs and alcohol abuse by students and employees (20 U.S.C. 1145g—Drug and Alcohol Abuse Prevention).*

*Pursuit to this requirement, the Department of Education General Administrative Regulations (EDGAR), 34 C.F.R. Part 86 (Part 86), mandate that colleges and universities: 1) annually distribute specified drug and alcohol prevention information to students and employees (“annual notification”), and 2) conduct a biennial review of their drug and alcohol prevention programs<sup>[1]</sup>.*

University of South Carolina (USC) has a long-standing commitment to alcohol and other drug prevention, including professional staff, prevention education, early intervention, and environmental management through a campus-community coalition which was founded in 2008.

USC has regularly used national tools to measure our progress and to select and implement best practices. USC has used the National College Health Assessment, the Core Institute alcohol and drug survey, and embedded surveys in the required educational program Alcohol Edu to measure students’ behaviors, perceptions, and attitudes. USC participated in the EverFi Alcohol Diagnostic Inventory rating tool in 2011 and 2017 to measure progress on best practice implementation. Institutional self-studies have also included the Time for Change study related to off-campus alcohol issues and the Social Compact study which included recommendations to address high-risk alcohol use. However, the committee was unable to locate prior Edgar 86 Biennial Review reports. We have developed this inventory and recommendations in the spirit of continuous improvements of both our efforts and compliance.

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[1] These regulations were originally published in the Federal Register, Vol. 55, No. 159, Aug. 16, 1990, pp. 33580–33601, and are now available at <https://ifap.ed.gov/regcomps/attachments/86.pdf> (accessed on December 2, 2016).

## Biennial Review Process

A sub-committee of the Carolina Community Coalition was recruited to serve as a biennial review work group. Committee members included graduate students and professionals from Student Health Services, Office of Student Conduct & Academic Integrity, Office of Fraternity and Sorority Life, International Student Services, and Substance Abuse Prevention & Education. Feedback was also solicited from the Coalition Steering Committee. Additional data was



solicited from USC Division of Law Enforcement & Security (USC DLES), Athletics, and University 101.

The committee met seven times between January and June 2018. Our initial objectives were threefold: 1) to gather information and determine the effectiveness of AOD prevention/education efforts, 2) to gather information about enforcement efforts, and 3) to determine how the Annual Notification is being conducted. Our findings are synopsized in the first half of this report; appendices are included with copies of major relevant documents.

In the future, the biennial review work groups will use this 2018 report's findings and goals to measure progress. Although prior biennial reviews are not present, the committee found two major reports on the status and progress of alcohol and drug prevention efforts have been developed in the last four years. These were the Social Compact sub-committee on alcohol and drug issues and the EverFi Alcohol Diagnostic Inventory. The committee reviewed these reports in depth and provides commentary of the status and feasibility of each recommendation.

Lastly, the committee developed a list of four overarching recommendations from the next biennium, with actionable objectives in each area which we believe will generate progress in these four target areas.

Biennial Reviews will be kept on campus at two central locations: the Dean of Students office and Substance Abuse Prevention & Education program.

## **Annual Policy Notification Process**

### *Employees*

The employee policy notification is required to have the following elements:

1. Standards of conduct that clearly prohibit, at a minimum, the unlawful possession, use or distribution of illicit drugs and alcohol by students and employees on its property or as part of any of its activities
2. A description of the applicable legal sanctions under local, State, or Federal law for the unlawful possession or distribution of illicit drugs and alcohol
3. A description of the health risks associated with the use of illicit drugs and the abuse of alcohol
4. A description of any drug or alcohol counseling, treatment or rehabilitation or re-entry programs that are available to employees or students
5. A clear statement that the institution will impose disciplinary sanctions on students and employees (consistent with State and Federal law), and a description of those sanctions, up to and including expulsion or termination of employment and referral for prosecution, for violations of the standards of conduct; a disciplinary sanction may include the completion of an appropriate rehabilitation program.

This required content is contained in policy HR 1.01, Drug-Free Workplace, although the health risks section is not very explicit. Policy language notes the practice of distribution to new employees and annually to continuing employees.

During this biennium, notification of our Drug-Free Workplace policy (HR 1.01) to new employees and annually to continuing employees occurred in multiple ways to ensure compliance:

- Bi-monthly in our New Employee Orientation;
- Temporary employees who do not attend University Orientation are informed through their Division/Department's onboarding process upon hire and review of all applicable University/HR policies;
- Through the University's Clery Act Annual Security and Fire Report under the "ALCOHOL AND DRUG POLICIES AND PROGRAMS TO PREVENT ALCOHOL AND DRUG ABUSE" section published and distributed by the USC DLES (Sept 28, 2016, Sept 29, 2017, and will be updated again on October 1, 2018).

Copies of the Annual Security report and affirmation of policy distribution by USC Human Resources are included in Appendix A.

### *Students*

The student policy notification is required to have the following elements:

1. Standards of conduct that clearly prohibit, at a minimum, the unlawful possession, use or distribution of illicit drugs and alcohol by students and employees on its property or as part of any of its activities
2. A description of the applicable legal sanctions under local, State, or Federal law for the unlawful possession or distribution of illicit drugs and alcohol
3. A description of the health risks associated with the use of illicit drugs and the abuse of alcohol
4. A description of any drug or alcohol counseling, treatment or rehabilitation or re-entry programs that are available to employees or students
5. A clear statement that the institution will impose disciplinary sanctions on students and employees (consistent with State and Federal law), and a description of those sanctions, up to and including expulsion or termination of employment and referral for prosecution, for violations of the standards of conduct; a disciplinary sanction may include the completion of an appropriate rehabilitation program.

The work group was not able to identify a single policy that is distributed to USC students which is inclusive of all required elements of Edgar 86. Specifically, there is not a publication or policy which includes the health risks associated with the use of illegal drugs and the abuse of alcohol, although it should be noted that the AlcoholEdu educational program which is required for all new students meets all of these requirements.

The issue of student policy notification was addressed in a recent U.S. Dept of Education Final Program Review Determination at Occidental College (Appendix B).

Specifically, Occidental was cited for not communicating the following program elements in their disclosure:

*The information in the handbooks did not address the following required program elements:*

- 1. No description of any health risks associated with the use of illicit drug and alcohol abuse;*
- 2. No description of any drug or alcohol counseling, treatment, and rehabilitation/re-entry programs that are available to students and employees;*
- 3. No statement that the College will impose disciplinary sanctions on students and employees for violations of the institution's codes of conduct and a description of sanctions.*

It is the recommendation of the committee that the Annual Security Report be amended to include the five required policy elements. Elements 1, 2, 4, & 5 are already present in that publication, which has a robust distribution model to meet the requirements. Specific language recommendations for consideration are attached in Appendix C.

### **Inventory of Policies, Policy Enforcement & Programs**

The work group gathered information from across campus on student behavioral data, policy and law enforcement, and prevention, education, and intervention programs regarding alcohol and other drugs. We organized this inventory into six major categories:

- A. Student Alcohol & Other Drug Behavior Data
- B. Policy Inventory
- C. Policy Enforcement Data
- D. Prevention Programming
- E. Fraternity & Sorority Life Data
- F. Early Intervention Programs

#### *A. Student Alcohol & Other Drug Behavior Data*

In May 2018, leadership in Student Affairs developed a matrix of all data that is collected related to student alcohol and drug use, including its frequency, content, and analysis. Relevant data was identified through SAPE, Student Health Services, Fraternity & Sorority Life, USC DLES, and the Office of Student Conduct & Academic Integrity. Major surveys included the National College Health Assessment, Healthy Minds Study, Fraternity & Sorority Life benchmarking surveys, and AlcoholEdu pre and post-test surveys. Incident data and data related to students with conduct violations included conduct data from Maxient, STIR and hospitalization survey data from SAPE, and police incident data. The full matrix is available as Appendix D.

### **National College Health Assessment (2010-2017) Alcohol and Drug Data Questions**

Student Health Services conducts the National College Health Assessment biennially. The following data shows student behavior over time, as well as a comparison of USC data to the most current national reference group of college students.

**Students reported level of alcohol (beer, wine, and liquor) use within the last 30 days:**

	2010	2013	2015	2017	Spring 2016 NCHA Reference	Baseline Difference
<b>Never used</b>	17.4%	18.7%	17.2%	14.5%	20.2%	(-)2.9
<b>Have used but not in 30 days</b>	11.9%	12.4%	11.3%	14.5%	16.2%	(+)2.6
<b>Used 1-9 days</b>	51.4%	51.0%	51.9%	52.8%	49.3%	(+)1.4
<b>Used 10-29 days</b>	18.2%	17.2%	18.2%	16.9%	13.3%	(-) 0.1
<b>All 30 Days</b>	1.1%	0.7%	1.4%	1.2%	1.0%	(+)0.1
<b>Any use within the last 30 days</b>	70.6%	69.0%	71.5%	70.9%	63.6%	(+)0.3

Observed Trends:

- 70.9% reported alcohol use in the past 30 days.
- Overall usage is higher than national reference for “any use of alcohol in the last 30 days”.

**Students perceived use of alcohol on campus within the past 30 days:**

	2010	2013	2015	2017	Spring 2016 NCHA Reference	Baseline Difference
<b>Never used</b>	2.0%	3.4%	4.4%	3.7%	4.4%	(+)1.7
<b>Have used but not in 30 days</b>	0.2%	1.2%	1.3%	1.0	2.0%	(+)0.8
<b>Used 1-9 days</b>	22.9%	28.7%	28.5%	26.9%	40.2%	(+)4
<b>Used 10-29 days</b>	55.9%	52.7%	49.6%	53.1%	40.8%	(-)2.8
<b>All 30 Days</b>	19.0%	14.0%	16.2%	15.1%	12.5%	(-)4
<b>Any use within the last 30 days</b>	97.8%	95.5%	94.3%	95.1%	93.5%	(-)2.7

Observed Trends:

- Compared to baseline, 2.7% decrease in student’s perception of others student’s use of alcohol within the last 30 days, however perception of others alcohol use was 95.1%, 1.6% higher than the national reference.

**Reported number of drinks students consumed last time they “partied” or socialized** (only students reporting one or more drinks were included in analysis):

	2010	2013	2015	2017	Spring 2016 NCHA Reference	Baseline Difference
<b>4 or fewer</b>	53.2%	58.6%	56.3%	57.3%	62.3%	(+)4.1
<b>5 or 6</b>	19.9%	21.7%	22.1%	20.7%	19.8%	(+)0.8
<b>7 or more</b>	26.9%	19.7%	21.6%	22%	16.2%	(-)4.9

Observed Trends:

- 57.3% reported 4 or fewer drinks last time they partied or socialized, a 4.1% increase compared to baseline.
- Compared to baseline students reporting 7 or more drinks has decreased by 4.9%.

**Students reported number of times having consumed 5 or more drinks at one sitting in the past 2 weeks:**

	2010	2013	2015	2017	Spring 2016 NCHA Reference	Baseline Difference
<b>N/A don't drink</b>	20.2%	19.8%	19.4%	19.0%	24.0%	(-)1.2
<b>0 times</b>	40.4%	43.6%	42.4%	43.6%	44.7%	(+) 3.2
<b>1-2 times</b>	24.9%	22.2%	24.8%	24.5%	21.3%	(-) 0.4
<b>3-5 times</b>	11.9%	11.8%	9.7 %	10.3%	7.8%	(-) 1.6
<b>6 or more times</b>	2.6%	2.6%	3.6%	2.6%	2.2%	0

Observed Trends:

- Compared to baseline, results show a 3.2% increase in the number of students reporting zero times for consuming 5 or more drinks at one sitting in the past 2 weeks.
- 24.5% of students reported having consumed 5 or more drinks in one sitting 1-2 times in the past 2 weeks.
- 12.9% of students reported having consumed 5 or more drinks in one sitting 3 or more times in the past 2 weeks.

**Students who reported within the last 30 days driving after consuming any alcohol** (students who responded “N/A, don’t drive” and “N/A don’t drink” were excluded from analysis):

	2010	2013	2015	2017	2020 Target Goal	Baseline Difference
<b>Driving after drinking alcohol</b>	35.8%	29.6%	28.3%	26.8%	32.2%*	(-) 16.9

*\*indicates that Healthy Campus 2020 goal was met.*

Observed Trends:

- The Healthy Campus 2020 goal for reducing the percentage of students reporting driving after consuming any alcohol within the last 30 days was met.
- There has been a 16.9% decrease in students who reported driving after consuming alcohol in the past 30 days compared to baseline.

**Students reported cigarette use within the past 30 days:**

	2010	2013	2015	2017	2020 Target Goal	Spring 2016 NCHA Reference	Baseline Difference
<b>Never</b>	63.1%	68.8%	71.9%	76.0%		76.1%	(+) 12.9
<b>Last 30 Days</b>	15.8%	13.4%	11.2%	7.7%	14.2%*	9.1%	(-) 8.1
<b>Every Day</b>	4.4%	2.5%	2.8%	1.6%		2.2%	(-) 2.8

*\*indicates that Healthy Campus 2020 goal was met.*

**Observed Trends:**

- Compared to baseline, 12.9% increase in the number of students reporting they never used cigarettes.
- Only 7.7% reported cigarette use in the past 30 days, an 8.1% decrease compared to baseline.
- The Healthy Campus 2020 goal for a reduction in cigarette use in the last 30 days was met.
- Overall, decrease in the use of cigarette use and below the national reference group.

**Students reported marijuana use within the past 30 days:**

	2010	2013	2015	2017	2020 Target Goal	Spring 2016 NCHA Reference	Baseline Difference
<b>Never Used</b>	63.2%	63.2%	61.7%	58.5%		60.3%	(-) 4.7
<b>Used, but not in the past 30 days</b>	20.5%	21.3%	23.9%	22.3%		21.0%	(+) 1.8
<b>Used 1-9 days</b>	10.8%	10%	8.9%	12.5%		12%	(+) 1.7
<b>Used 10-29 days</b>	3.6%	3.6%	3.6%	4.6%		4%	(+) 1
<b>Used all 30 days</b>	1.9%	2%	2%	2.2%		2.7%	(+) 0.3
<b>Any use within the past 30 days</b>	16.2%	15.5%	14.4%*	19.3%	14.6%	18.7%	(+) 3.1

*\*indicates that Healthy Campus 2020 goal was met.*

**Observed Trends:**

- Overall, an increase in the number of students reporting use of marijuana.
- Use increased by 3.1% within the last 30 days to 19.3%.
- Healthy Campus 2020 goal to reduce any use within the past 30 days was not met for 2017.

**Perception of other students marijuana use within past 30 days:**

	2010	2013	2015	2017	Spring 2016 NCHA Reference	Baseline Difference
<b>Never Used</b>	5.7%	7.9%	8.1%	7.0%	8.6%	(+) 1.3
<b>Used, but not in the past 30 days</b>	7.8%	8.8%	8.2%	4.6%	6.3%	(-) 3.2
<b>Used 1-9 days</b>	48.7%	46.2%	43.7%	42.4%	42.7%	(-) 6.3
<b>Used 10-29 days</b>	28.8%	26.6%	28.8%	34.9%	29.1%	(+) 6.1
<b>Used all 30 days</b>	9.1%	10.5%	11.3%	11.1%	13.3%	(+) 2
<b>Any use within the past 30 days</b>	86.5%	83.3%	83.8%	88.4%	85.1%	(+) 1.9

**Observed Trends:**

- Perception of other students use of marijuana 1-9 days in the past 30 days decreased by 6.3%, while perception of using 10-29 days within the past 30 days increased by 6.1%.
- Student perception of others engaging in any use of marijuana in the past 30 days was 88.4%.

**Proportion of students who reported using prescription drugs that were not prescribed to them within the last 12 months:**

	2010	2013	2015	2017	2020 Target Goal	Spring 2016 NCHA Reference	Baseline Difference
<b>Antidepressants</b>	3.7%	2.8%	2.1%	3.4%		2.3%	(-) 0.3
<b>ED drug</b>	0.9%	1%	0.4%	0.8%		0.6%	(-) 0.1
<b>Pain killers</b>	10.2%	6.1%	4.8%	4.3%		5.3%	(-) 5.9
<b>Sedatives</b>	6.8%	4.3%	5.5%	4.7%		3.5%	(-) 2.1
<b>Stimulants</b>	9.9%	10.9%	10.7%	10.7%		6.5%	(+) 0.8
<b>Used one or more</b>	18.3%	15.4%	15.2%	15.4%*	16.5%*	12.1%	(-) 2.9

*\*indicates that Healthy Campus 2020 goal was met.*

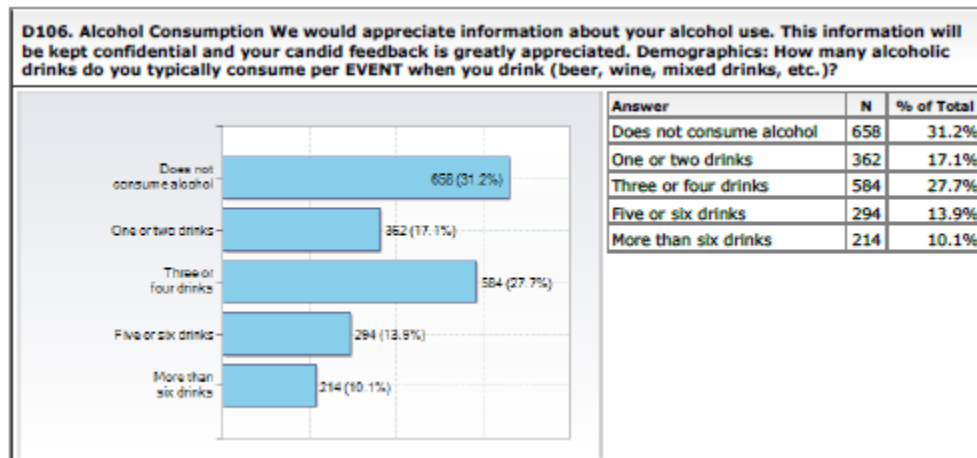
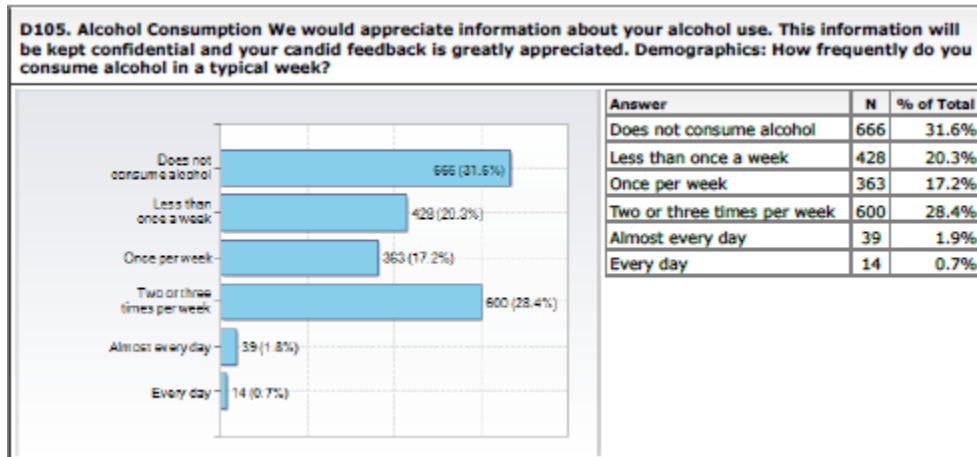
**Observed Trends:**

- Overall, decrease in the use of prescribed drugs except stimulants.
- Maintained Healthy Campus 2020 goal of a reduction in reported use of one or more prescribed drugs.
- Reported use of pain killers has decreased by 5.9% compared to baseline.

- Stimulant use continues to be the highest reported non-prescription medication used, at 10.7% (although no change from 2015) and remains higher than national benchmark of 6.5%.

### First-Year Student Assessment Alcohol Questions: Fall 2017:

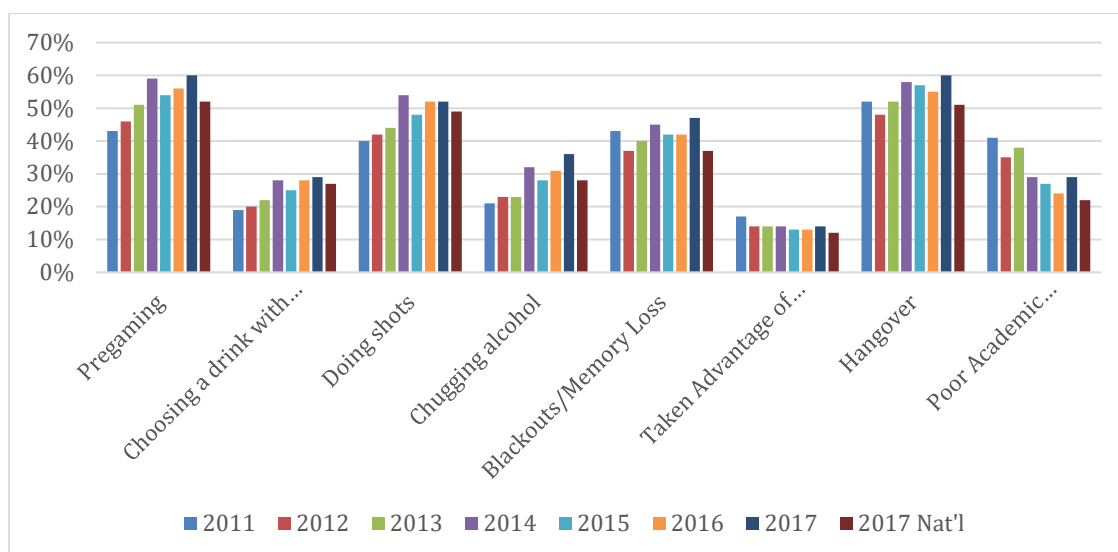
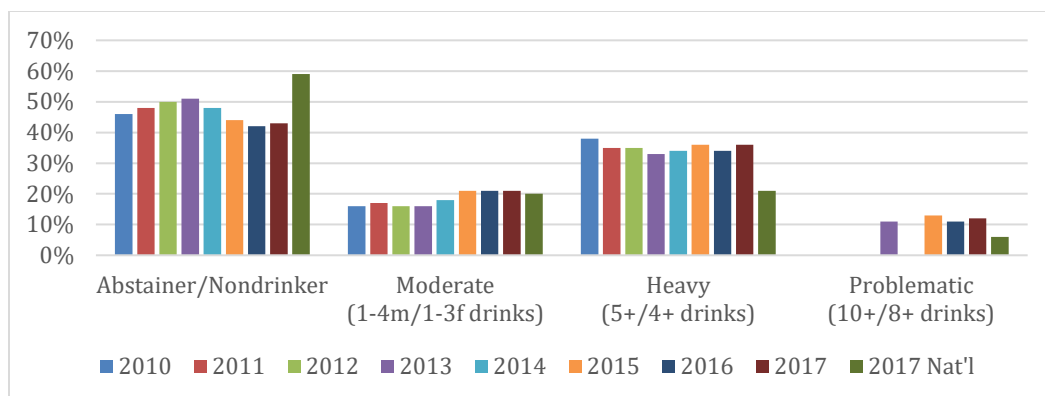
University 101, USC's nationally recognized first-year experience program, conducts its First-Year Student Assessment at the end of the fall semester. The following questions about alcohol use are included:



### AlcoholEdu Student Alcohol Use Data

All incoming students complete an alcohol education course (AlcoholEdu) that includes surveys of substance use behavior and related consequences. Since 2010, first year students who do not drink has steadily decreased while heavy and problematic drinking and consequences have increased and remain substantially above the national and SEC averages.





### Where USC Freshmen Drink:

According to AlcoholEdu data (2017-18 Alcohol Edu Impact Report, pg. 17 & 19):

- 42% of our first year students in 2017 reported drinking most often in bars and nightclubs.

The proportion of our first year students who report most often drinking in bars and nightclubs has steadily increased every year since 2011, when 26% of first year students reported drinking in these locations.

By comparison, 12% of freshman nationally and 25% of freshman at SEC schools report bars and nightclubs as their most common location for drinking.

## Five Points

Anecdotally, students describe Five Points as providing easy access to alcohol without regard for age, financial incentives (less \$\$) for shots and liquor pitchers over beer, and free drinks on special occasions such as birthdays, even if it's your 19<sup>th</sup> birthday.

76% of students who completed Alcohol Edu and 50% of students referred to Students Taking Initiative & Responsibility (STIR) report not having a fake ID.

## Students Referred to Students Taking Initiative & Responsibility (STIR) for Alcohol Overdoses:

Students who violate campus alcohol and drug policy and those hospitalized for alcohol overdose are referred to the Students Taking Initiative & Responsibility (STIR) program for a screening and brief intervention program. In 2017-2018, when asked where they had their last drink on the night of their incident, 31% of those referred for alcohol violations and 40% of those referred for hospitalizations reported a Five Points establishment as the location of their last drink.

- This means that these students consumed their last drink in Five Points and then were issued a citation by a police officer or transported to the hospital for intoxication.
- Only 7 of the students referred to Students Taking Initiative & Responsibility (STIR) for alcohol hospitalizations were over age 21.
- Of students who were referred to STIR for an alcohol hospitalization in 2017-18, 50% reported drinking shots, 57% reported drinking a mixed liquor drink, and 12% reported drinking a fishbowl or liquor pitcher.

## *B. List of Relevant Policies with Hyperlinks*

University of South Carolina alcohol and drug policies are publicly available to employees and the student body. The policies are highlighted in the required AlcoholEdu online educational program, which is required for all new students to USC.

Alcohol and drug-related behaviors are addressed in:

- STAF 6.26 [Student Code of Conduct](#)
- STAF 3.02 [Alcohol Policy & Guidelines for the University Community](#)
- STAF 3.18 [Drug Policy for University Students](#)
- HR 1.01 [Drug-Free Workplace](#)
- HR 1.95 [Drug and Alcohol Testing Policy](#)

## *C. Policy Enforcement Data*

1. *Office of Student Conduct & Academic Integrity Campus Conduct Policy Enforcement.* The following table including the number of alcohol violation findings of responsibility from 2014-2017.

<i>Alcohol Violations</i>	<i>2016- 2017 Sum</i>	<i>2016- 2017 Fall</i>	<i>2016- 2017 Spring</i>	<i>2016- 2017 Total</i>	<i>2015- 2016 Sum</i>	<i>2015- 2016 Fall</i>	<i>2015- 2016 Spring</i>	<i>2015- 2016 Total</i>	<i>2014- 2015 Sum</i>	<i>2014- 2015 Fall</i>	<i>2014- 2015 Spring</i>	<i>2014- 2015 Total</i>
<i>Total alcohol violations (by category below):</i>	<i>18</i>	<i>891</i>	<i>435</i>	<i>1854</i>	<i>19</i>	<i>521</i>	<i>349</i>	<i>889</i>	<i>24</i>	<i>892</i>	<i>413</i>	<i>1327</i>
<i>Alcohol/drug hospitalizations</i>	<i>3</i>	<i>166</i>	<i>86</i>	<i>255</i>	<i>1</i>	<i>93</i>	<i>62</i>	<i>156</i>	<i>2</i>	<i>71</i>	<i>48</i>	<i>121</i>
<i>Possession/ consumption</i>	<i>5</i>	<i>538</i>	<i>277</i>	<i>820</i>	<i>5</i>	<i>286</i>	<i>169</i>	<i>460</i>	<i>14</i>	<i>547</i>	<i>224</i>	<i>785</i>
<i>Fake ID</i>	<i>3</i>	<i>193</i>	<i>58</i>	<i>254</i>	<i>5</i>	<i>60</i>	<i>31</i>	<i>96</i>	<i>1</i>	<i>124</i>	<i>46</i>	<i>171</i>
<i>Dangerous Behaviors - DUI</i>	<i>5</i>	<i>17</i>	<i>10</i>	<i>32</i>	<i>2</i>	<i>22</i>	<i>11</i>	<i>35</i>	<i>2</i>	<i>16</i>	<i>11</i>	<i>29</i>
<i>Common container</i>		<i>4</i>	<i>4</i>	<i>8</i>	<i>;</i>	<i>3</i>	<i>4</i>	<i>7</i>		<i>3</i>	<i>1</i>	<i>4</i>
<i>Distribution</i>		<i>1</i>	<i>0</i>	<i>1</i>				<i>0</i>		<i>1</i>	<i>1</i>	<i>2</i>
<i>General Laws - Alcohol</i>												

<i>Presence of alcohol in a dry room</i>		31	6	37		10	16	26		32	14	44
<i>Laws and USC regulations</i>		9	0	9	3			3		3	6	9
<i>Open container</i>		4	5	9		4	2	6		6	3	9
<i>Alcohol paraphernalia</i>	1	59	38	98	1	16	36	53	5	50	27	82
<i>Public intoxication</i>	1	33	10	44	2	21	18	41		36	25	61
<i>Violating other regulations while under the influence</i>		2		2		6		6		3	7	10
<i>Gameday Ejections due to Alcohol</i>				164								

2. *Annual Security Report*: The University of South Carolina Annual Security report includes the number of criminal arrests and disciplinary referrals made by campus law enforcement that fit within the required reporting parameters for 2014-2016.

### **Criminal Arrests for Violations for Illegal Weapons, Drugs, & Alcohol**

Arrests for Weapons, Drugs, & Alcohol	Total On Campus			On Campus Residence Halls			Non-Campus			Public Property		
	'14	'15	'16	'14	'15	'16	'14	'15	'16	'14	'15	'16
Illegal Weapons Possession	1	1	2	0	0	1	0	2	0	0	2	1
Drug Law Violations	154	139	141	70	89	86	0	1	0	37	53	35
Liquor Law Violations	67	39	39	40	23	28	0	2	0	30	26	14

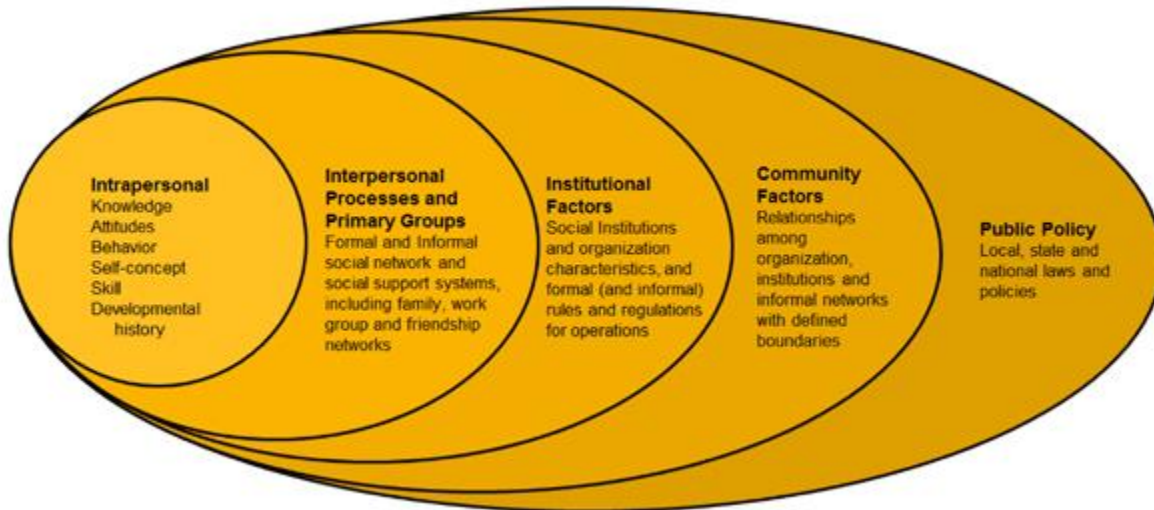
### **Disciplinary Referrals for Illegal Weapons, Drugs, & Alcohol**

Disciplinary Referrals for Weapons, Drugs, & Alcohol	Total On Campus			On Campus Residence Halls			Non-Campus			Public Property		
	'14	'15	'16	'14	'15	'16	'14	'15	'16	'14	'15	'16
Illegal Weapons Possession	0	9	0	0	9	0	0	0	0	0	0	0
Drug Law Violations	129	115	85	124	86	67	0	19	0	0	7	0
Liquor Law Violations	801	356	634	718	338	571	9	4	1	0	2	0

3. *Fraternity & Sorority Organizational Discipline*: The [Tucker Hipps Transparency Act](#) requires the establishment of a website that details the disciplinary actions against chapters as well as a list of chapters under suspension. At the time of this writing, USC reports the names of four chapters under suspension and details cases against chapters since 2012. There were 15 reports in 2016-2017 and 12 reports in 2017-2018.

#### *D. Prevention Programming*

During 2017-2018, the Division of Student Affairs catalogued the institution's evidence-based alcohol and drug prevention efforts. The chart below arranges our efforts along the socio-ecological framework (SEF) from individual, group, institutional, community, to policy & law. Public health practice and research supports the effectiveness of mutually reinforcing efforts at all levels of this framework with evidence that policy and community-based interventions are particularly effective.



Adapted from McLeroy, K. R., Steckler, A. and Bibeau, D. (Eds.) (1988). The social ecology of health promotion interventions. *Health Education Quarterly*, 15(4):351-377. Retrieved May 1, 2012, from [http://tamhsc.academia.edu/KennethMcLeroy/Papers/81901/An Ecological Perspective on Health Promotion Programs](http://tamhsc.academia.edu/KennethMcLeroy/Papers/81901/An_Ecological_Perspective_on_Health_Promotion_Programs).

Social Ecological Framework Level	Current Efforts
<b>Individual</b> Attitudes, beliefs, and knowledge	Classroom presentations (SAPE, Student Conduct, USCPD, U101 Peer Leaders) Alcohol Edu online education required for all incoming students STIR (screening and brief intervention using BASICS model) Fines and educational sanctions for Code of Conduct violations Individual and group counseling through Counseling & Psychiatry Alcohol Skills Training for student organizations and at tables by student Peer Educators
<b>Group</b> Norms, communication, and relationships of groups or social networks	Fraternity & Sorority Life Event Registration Process Fraternity & Sorority Life Hospitalization notification (communication with chapter leaders re: alcohol transports) Recruitment education for participants and potential sophomore “bigs” Educational sessions during fraternity and sorority recruitment focused on alcohol and drugs Specialized trainings with fraternity leadership regarding high risk events, such as tailgates and Carolina Cup Educational presentations for Fraternity and Sorority chapters
<b>Institution</b> Messages and cultures within the entire institution	Alcohol Policy Workshops/Event Registration Bystander Intervention Program (Stand Up Carolina) Messages from President related to responsible celebrating, healthy breaks, etc Talking Points discussion guide for parents of incoming students High profile speakers/events: Film Screenings, Momentum Series Late night alternative options (Carolina After Dark, movies, intramurals, recreation activities) Alcohol-free tailgates for every home football game Five Points Shuttle Targeting high risk traditions: Tailgating, Carolina Cup, Mountain Weekends, etc Orientation skits and messaging (including print materials)
<b>Community</b> Off-campus organizations, activities, and campaigns	Carolina Community Coalition Collaboration with tailgate lot owners, law enforcement, Inter-Fraternity Council to develop guidelines and policies for responsible tailgating Partnerships with local agencies (LRADAC, MADD) Relationships with neighborhood associations
<b>Policy &amp; Law</b> Rules, policies, and laws that govern the environment	Alcohol Policy Parental Notification policy Student Ticketing policy (denying ticketing privileges for students ejected from football games due to alcohol) Consistent policy enforcement and sanctions (AET, Party Patrols) Off-Campus Incident Reports (local residents can alert University about high risk or disruptive behavior) University participation in alcohol license protests

*Prevention Program Summary:*

Prevention Program and Student Participation Summary

	2016-2017		2017-2018	
	Programs	Participants	Programs	Participants
Alcohol Edu Participants		7020		7689
Presentations	72	2500	107	10,400
Coalition Meetings	20		32	
Alcohol event registrations	113		172	
Alcohol Policy workshops	18	71	25	78
Students completing STIR		219		329

The Carolina Community Coalition meets monthly, with a focus on topics that expand the knowledge and resources of the group along with a steering committee and designated workgroups. Over the last two years, we have transitioned the Coalition structure into workgroup projects that have realistic, specific, short-term goals.

Over the last two years, the Substance Abuse Prevention and Education office has increased educational programs and presentations over 400%, validating the potential impact when the office is fully staffed. Full blueprint reports for 2016-2017 and 2017-2018 are available as Appendix I.

*Excerpts from 2017-2018 Substance Abuse Prevention & Education program Blueprint:*

SAPE staff conducted 107 outreach programs for over 10,400 students, staff, faculty and parents. This continues our trend with a 49% increase from FY17 programs and a 300% increase in participation. More large events drive this increase, including alcohol-free tailgates, presentations for sorority women, Tunnel of Awareness display, and the Momentum Series. The Momentum Series sponsored with the Leadership & Service Center and Omicron Delta Kappa honor society provided a high-profile method of communicating about addiction, recovery, and campus resources.

We increased collaborative efforts with a variety of partners to improve AlcoholEdu completion, facilitate educational programs and events, and develop the Recovery Community. As an example, 62% of the programs and presentations offered by SAPE this year included a campus or community partner. Our participation diversified to include several new student organizations and Coalition members.

Over 82% of incoming students met the October deadline for Alcohol Edu, with 7,134 completing by December 13th. This is a 4% increase over last fall in completing by the deadline despite the increase in number of new students. Through increased marketing and communication with key



campus partners, we responded to 22% fewer calls and emails from students with spring registration holds, dropping to 672 contacts for the entire year.

Last summer, SAPE, Student Conduct, and U101 worked together to update the U101 alcohol curriculum taught by peer leaders. Two-thirds of the content now utilizes an evidence-based strategy. Significant edits were also made to the U101 textbook. We also made an intentional effort to increase bystander intervention content in educational presentations, resulting in 65% (70) of these programs including bystander education. Informal tabling opportunities also provided a new avenue for promoting positive social norms this spring.

In the last year of our NCAA CHOICES grant, SAPE sponsored tailgates for every home football game (7) with over 300 students passing through each tailgate. Our evaluations indicate that 50% of participants had no plans for a meal before the game and most were low to moderate risk drinkers. Educational programs and social media messages were also implemented specifically targeting the high-risk times of Welcome, first football game, Halloween, Spring Break, summer, and exams with over 750 students.

8 faculty, staff, and students participated in 25 workshops, an increase in both participation and number of workshops. A total of 172 alcohol event registration forms were submitted, a 52% increase from last year, with an average of 5 days to approval. The online event registration process is significantly more efficient for everyone, although some event planners continue to use the paper forms.

*Excerpts from 2016-2017 Substance Abuse Prevention & Education program Blueprint:*

SAPE has worked to increase collaborative efforts with a variety of partners to improve AlcoholEdu efficiency, facilitate collaborative presentations and programs, implement Coalition efforts, integrate mental health screening into Students Taking Initiative & Responsibility (STIR), and develop the Recovery Community. Key stakeholders have included Academic Advising, College of Social Work, Carolina After Dark, Healthy Carolina Initiatives, Fraternity & Sorority Life, Leadership & Service, SAVIP, Student Conduct Office, Student Success Center, Study Abroad, and University 101. As an example, 74% of the programs and presentations offered by Substance Abuse Prevention & Education program this spring included a campus or community partner.

The Coalition held five monthly meetings with an average of 15 participants, six steering committee meetings with an average of eight participants, and 12 workgroup meetings with an average of five participants this semester. We have focused monthly Coalition meetings on topics that expand the knowledge and resources of the group and developed workgroup projects that have realistic, specific, short-term goals.

This spring, Substance Abuse Prevention & Education program staff conducted 34 presentations for over 1700 faculty, staff, and students, bringing the total for the year to 72 presentations for over 2500 people. This is a 128% increase in presentations and 160% increase in participation compared to last year, which validates the potential impact when the office is fully staffed. We also expanded outreach efforts by partnering with Student Health Services in several tabling programs designed to

promote risk reduction messages before high-risk times, including Spring Break, St. Patrick's Day, and finals, with food and educational materials distributed to over 850 students.

59% of the presentations were requested from academic departments and organizations including Fraternity and Sorority chapters and resident mentors. Substance Abuse Prevention & Education program staff provided an overview of campus data to the MyCarolina Alumni Association staff, Office of Student Conduct hearing officers, and Student Health Services Administrative Council, and discussed how to recognize and refer a student with problematic use with Changing Carolina Peer Leaders, Fraternity & Sorority Life Property Managers, Student Success Center Advisors, and Study Abroad faculty and staff. These requests should increase as awareness of the Substance Abuse Prevention & Education program office and our expertise increases.

Substance Abuse Prevention & Education program replaced the former TIPS Training with a campus-designed Alcohol Policy Workshop in the fall, allowing us to better meet the needs of the academic department representatives who compose most of the participants. We offered six workshops this spring for 34 participants, including students, property managers, and faculty and staff. Participants continued to retain knowledge from the workshop, with an average score of 76% on the direct assessment, and provided useful feedback to suggest ways to improve content retention.

Substance Abuse Prevention & Education increased our social media presence, with approximately 300 prevention messages this semester and an 8% increase in followers. Gamecock Recovery had a 10% increase in followers and page likes and messages communicated information about Gamecock Recovery events, recovery support, and fun, sober activities in Columbia.

The SAPE office is not the only office that includes alcohol and other drug prevention messages in their educational programs for students. USC's Division of Law Enforcement Services, the Office of Student Conduct and Academic Integrity, Student Health Services' Healthy Campus Initiatives, including Sexual Assault Violence Intervention & Prevention, and the Changing Carolina Peer Leaders, and the undergraduate and graduate Peer Leaders who co-teach in University 101 include evidence-based prevention messages in their programs promoting student health and safety and affirming non-drinkers and student who use in a low-risk manner. Student leaders such as Resident Mentors and student conduct board members receive training about alcohol and other drug concerns and how to support peers through their training programs.

University of South Carolina has dedicated resources to Gamecock Recovery, its collegiate recovery program. This supplements the student-led program which was being supported by faculty and student affairs departments. SAPE staff now includes a Collegiate Recovery Program Coordinator. Gamecock Recovery includes education, advocacy, support to individuals in recovery and programs that create a strong social support network for USC students in recovery.

### *E. Fraternity & Sorority Life Data*

#### **EDUCATION**

- During Inter-Fraternity Council recruitment, potential new members attend an educational session about substance abuse.
- During Multicultural Greek Council/National PanHellenic Council Intake, all new members must attend Intake Orientation which covers education on high risk behaviors.
- During Panhellenic recruitment, College Panhellenic Association holds an education session for “Big Sisters” prior to the start of the new member process, which includes education on high risk behaviors and serving as a mentor to new members.
- All Interfraternity Council chapters must have a new member education meeting with the Director of Fraternity & Sorority Life to discuss new member plans and ensuring they align with values of organization.
- Interfraternity Council, Office of Fraternity & Sorority Life staff, and USC DLES meet to discuss tailgate policies and best practices during football season.
- There is a Risk Management/Social Event Leadership training track at Spring Greek Leadership Conference.
- In Fall 2017, Fraternity & Sorority Life invested a large volume of time in engaging student leaders related to the event notification system. This time intensive investment led to more educational dialogues, more stakeholder engagement, and safer events facilitated by private organizations.
- Fraternity & Sorority Life has used the Dyad community assessment (Fall 2017) and SkyFactor benchmarking surveys to gauge community trends and needs.
- Trainings for Property Managers with Substance Abuse Prevention & Education program, emergency and crisis management, drug recognition, crime prevention, and function night training

#### **INCIDENTS & SANCTIONS**

- A reduction in the volume of organizational student conduct outcomes; 6 chapters were found responsible for violations related to AOD in Fall 2016 and 3 chapters were found responsible in Fall 2017.
- In Fall 2016, development of a social event management system (in collaboration with community stakeholders) resulted from numerous reports of alcohol transports, hazing, and high risk social events hosted by student organizations at the beginning of the semester.
- In Fall 2017, implementation of a FERPA membership form that saw a lower volume of community members transported for alcohol hospitalization

### *F. Early Intervention Programs:*

In 2016-2017, a total of 219 students completed Students Taking Initiative & Responsibility (STIR) this year with an additional 35 students scheduled to complete the program in the fall. Fifteen

students did not complete the program and 27 were referred for significant drug use or mental health concerns. The Students Taking Initiative & Responsibility (STIR) program remains incredibly effective on students' behavior, with an 85% increase in students who report abstaining from alcohol use on the exit survey as well as reductions in the average number of days per month that students report drinking (from 4.75 to 3.4) and the average number of drinks per occasion (decreased by 25% from 4.2 to 3.3). Students also report an 86% decline in past month marijuana use and, among those still using marijuana, reduction from 8.5 to 5.2 use days per month. In addition to reducing use, Students Taking Initiative & Responsibility (STIR) participants also report substantive declines in their use related consequences and significant increases in their use of risk reduction strategies.

In 2017-2018, SAPE had 329 students successfully completing STIR, a 50% increase over last year mostly due to the change in hospitalization protocol. Between intake and exit, there was a 70% reduction in past-month marijuana use, a 46% reduction in students reporting having 8 or more drinks per occasion, and a 50% increase in students reporting no use of alcohol or marijuana in the last 30 days. Also, our data shows a 43% reduction in students who report having blacked out in the last month and a 37.5% decrease in students reporting "sometimes or usually" performing poorly on a test/assignment due to AOD use in the last 30 days.

In an effort to better manage students who are transported to the hospital due to their alcohol or drug use, SAPE partnered with the Office of Student Conduct and Counseling & Psychiatry to develop a streamlined process for assessing the needs of those students. Starting in March, hospitalized students came for a Substance Abuse Prevention & Education Assessment within 48 hours of their conduct hearing, allowing us to refer them to Students Taking Initiative & Responsibility (STIR), Counseling & Psychiatry, or to an off-campus resource quickly. We used a similar model to assess students at the end of the semester, resulting in 35 students who are scheduled to start Students Taking Initiative & Responsibility (STIR) in the fall but did not have to wait all summer for their initial screening.

Students Taking Initiative & Responsibility (STIR) developed a process to accept non-conduct referrals this fall and received 8 referrals from parents, Psychiatry, or their attorney with limited marketing of this opportunity. To help raise awareness of this resource, Substance Abuse Prevention & Education program staff facilitated presentations about recognizing a problem and referring a student for advisors in the Student Success Center, the Changing Carolina Peer Leaders, Fraternity & Sorority Life Property Managers, Student Health Services Administrative Council, and Study Abroad faculty and staff.

The CAAPS class is a partnership between the Office of Student Conduct and Substance Abuse Prevention & Education program as a sanction for students who have a first alcohol violation. Substance Abuse Prevention & Education program interns co-facilitated 26 classes with graduate students from OSC.

Students Taking Initiative & Responsibility (STIR) Coaches have been trained to utilize the Personal Health Questionnaire (PHQ-9), which provides additional mental health screening, allows deeper discussion with the students about their concerns and campus resources, and will deliver important data on the intersection of students' substance use and mental health.

Overall, the committee found and catalogued an extensive commitment to strong policies, consistent enforcement, and evidence-based prevention and intervention programs. Notably, institutional leadership actively facilitates cross-departmental coordination of efforts and data sharing.

## **Review of Prior Recommendations**

### **Social Compact Report**

*The Social Compact Report was reviewed due to its recent institutional importance; implementation of the social compact is outlined as a key priority of the new established Dean of Students position starting in July 2018. The full report is included as Appendix G.*

### **Alcohol and Other Drugs Subcommittee Full Report**

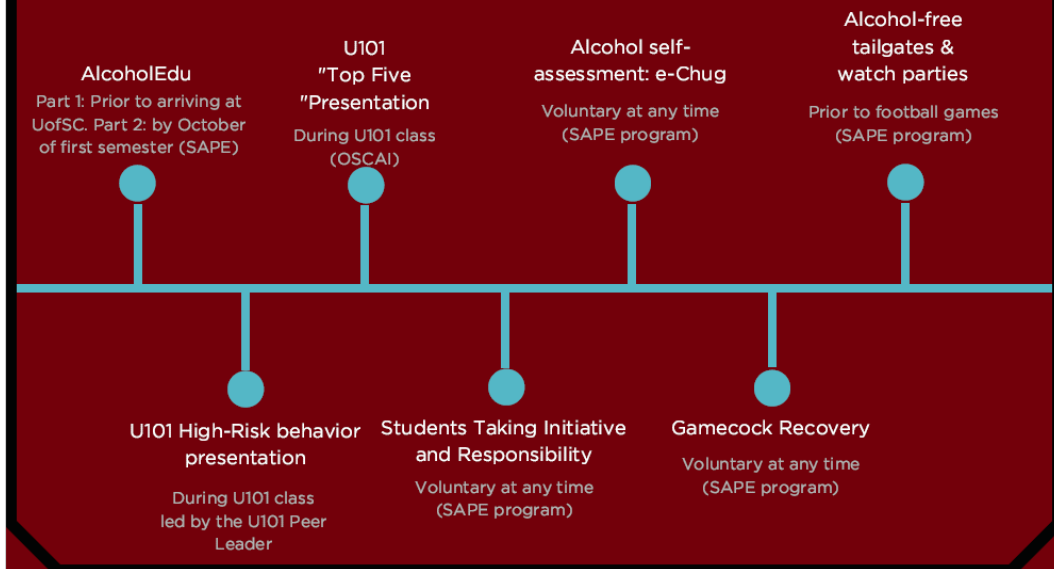
The Alcohol and Drugs Subcommittee of the Social Compact Study Group met several times to 1) review campus issues related to alcohol and drugs, 2) create a written document intended to notify students of information regarding responsibilities for behavioral standards related to alcohol and drugs, and 3) to develop recommendations regarding information dissemination to students, parents, alumni, faculty and staff to increase compliance and facilitate culture change. A detailed summary of those recommendations, as well as general systematic considerations are listed below.

*Recommendations for on-campus alcohol and drug prevention initiatives:*

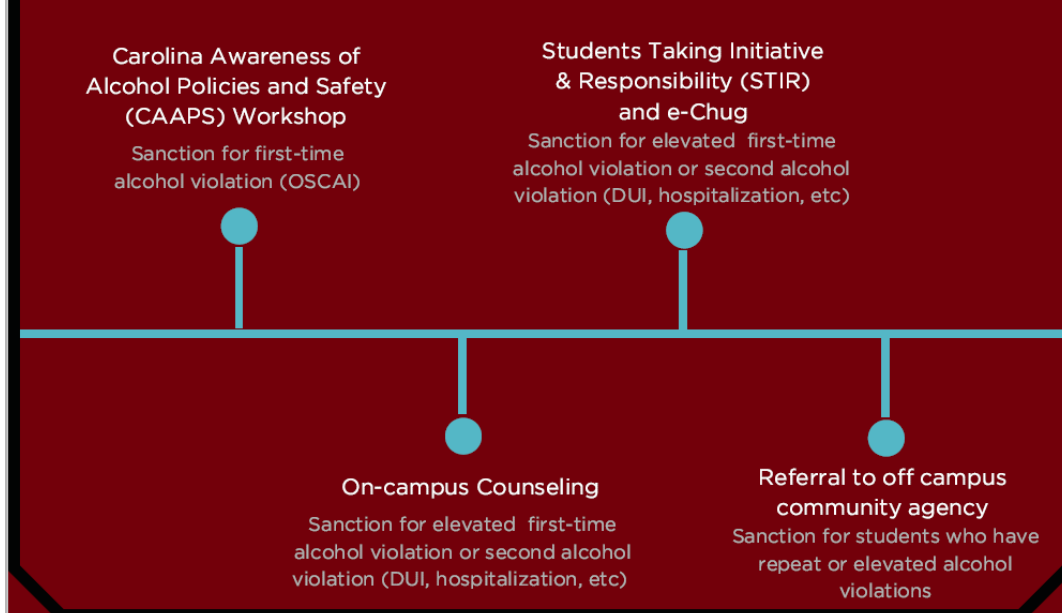
- The university should develop and implement clear, consistent prevention communication messages that align with the institution's policies and practices and should be void of gaps and duplications.  
*The committee affirms this as a major recommendation. The institution sends a consistent set of linked messages to incoming students from orientation to University 101, floor meetings, and Alcohol Edu pre-matriculation and booster messages. Intentional examination and planning of future messages can deepen and reinforce efforts.*
- Prevention communication messages should begin in high school and extend through the student's graduation from college. The university should develop and adopt a matrix of key student touch point times beginning in high school and continuing through college graduation that identifies when prevention messages and information will be disseminated. The university should consider establishing a training team that goes to top USC feeder schools to discuss the ways to reduce the risks and negative consequences associated with alcohol and drug use in college. Research shows that the first six weeks of college are the most critical times for students to receive prevention messaging as students are beginning to identify with the university's cultural norms. For each student touch point marker, a complimentary prevention message should be sent to alumni, parents, student organizations, faculty and staff.  
*We affirm and highlight this recommendation about actions for existing university students. However, we would also highlight that substance abuse among high school students is at an all-time low (Source: Monitoring the Future), while USC high-risk alcohol use rates have increased. Therefore, we recommend focusing on the messaging from and during the university experience.*

- The university should establish and promote, through university funding, evening and weekend alternative, alcohol-free, student-desired activities on and off campus.  
*We affirm this as a top recommendation and suggest using the evidence-based strategies mentioned in the Alcohol Diagnostic Inventory (Appendix J) and the recommendations of the Campus Community Coalition Late Night work group (Appendix K).*
  
- The university should increase efforts to change norms about drinking as associated with the SEC culture by requiring training for all faculty advisors and student organizations, to include all Fraternity & Sorority Life chapters, honor, interest, international, media, military, political, and professional groups. This initiative should include the development of faculty training materials in addressing alcohol and drug issues and concerns during academic advising.  
*We affirm the recommendation for correcting unhealthy social norms. While students should be the primary target of a normative campaign, addressing the faculty and staff role in shifting cultural beliefs and proactively engaging faculty and staff in the campaign can lower resistance and increase saturation of the messages.*
  
- The university should develop a systematic approach to address student substance use issues by providing a full continuum of alcohol and other drug university services to include prevention, early identification, intervention, treatment and recovery.  
*Significant progress has been made on this recommendation with the establishment of Gamecock Recovery and its program coordinator, development of peer education programs, increasing effective prevention programming, and enhanced delivery of evidence-based early intervention programs. The following graphics were developed by the committee to display the incremental prevention programs & early intervention services.*

## Preventative Measures Alcohol Education



## Interventions Alcohol Education





- The university must understand that reshaping norms, culture, and behavior requires motivation and educational interventions to prepare the Carolina community for change, skill building interventions to help members carry out new practice, and reinforcement/enforcement of the new structural changes. Institutional change occurs incrementally and over long periods of time. The university must be committed to these efforts for the long run in order to make sustainable changes.

*USC has deepened its commitment to evidence-based practice and engaged in partnerships with campus partners and the local community to address high-risk drinking environments, specifically with tailgate culture (football and Carolina Cup) and entertainment district issues. The university must continue to hold its position and partnerships through pushback in order to effect long-term change.*

#### *Recommendations for off-campus initiatives:*

- The university should initiate statewide lobbying efforts to reduce access and availability to illicit drugs and alcohol in hospitality districts surrounding the university and at student-attended events (such as Carolina Cup) that include: reducing high alcohol retail outlet density; enforcing S.C. laws on drink specials, happy hours and hours of operation; limiting alcohol promotional messaging on social media; and strict enforcement on minimum age drinking laws. Lobbying efforts also should include support for developing independent funding sources that allow for state and local offices to function without relying on the cost of underage drinking/misbehavior. This initiative should include collaborating with the City of Columbia and Richland County to develop and enforce laws addressing sales, service practices and environmental design in local hospitality districts.

*USC has taken a public stance on several specific entertainment district issues. Next steps include establishing guidelines for what USC's specific parameters will be for responding to requests or choosing to engage in activities like protesting alcohol licenses or testifying at public hearings.*

#### **EverFi Alcohol Prevention Action Plan (September 2017)**

USC completed EverFi's Alcohol Diagnostic Inventory in 2011 and 2017. This inventory, which is based on institutional self-reported responses, is broken down into four areas: Programs, Policies, Critical Processes, and Institutionalization. Review and action on Alcohol Diagnostic Inventory is recommended as a strategy to guide the development of a biennial review. Therefore, the committee reviewed each of these areas and the EverFi recommendations. Following is a list of committee reactions, commentary and additional recommendations which range from affirm, partially affirm, continue, or additional recommendations from the committee.

It should be noted that USC has made significant progress in the concepts rated by the Alcohol Diagnostic Inventory between 2011 and 2017. The 2017 recommendation by EverFi are rooted in institutionalization and enhancement. The full report is available as Appendix J.

## PROGRAMMING

<b>UNIVERSITY OF SOUTH CAROLINA</b>	<b>2011: D</b>	<b>2017: B-</b>
<b>UNIVERSAL:</b>	<b>2011: C-</b>	<b>2017: B+</b>
<b>SELECTIVE:</b>	<b>2011: D</b>	<b>2017: C+</b>
<b>INDICATED:</b>	<b>2011: F</b>	<b>2017: B-</b>

## POLICY

<b>UNIVERSITY OF SOUTH CAROLINA</b>	<b>2011: C+</b>	<b>2017: B</b>
<b>WRITTEN:</b>	<b>2011: C+</b>	<b>2017: C+</b>
<b>ENFORCED:</b>	<b>2011: C-</b>	<b>2017: C-</b>
<b>ADJUDICATED:</b>	<b>2011: C</b>	<b>2017: A+</b>

## CRITICAL PROCESSES

<b>UNIVERSITY OF SOUTH CAROLINA</b>	<b>2011: C</b>	<b>2017: B+</b>
<b>DATA RELIANCE:</b>	<b>2011: C</b>	<b>2017: C+</b>
<b>PLANNING:</b>	<b>2011: C-</b>	<b>2017: A+</b>
<b>POLICY REVIEW:</b>	<b>2011: C+</b>	<b>2017: D-</b>

## INSTITUTIONALIZATION

<b>UNIVERSITY OF SOUTH CAROLINA</b>	<b>2011: C-</b>	<b>2017: B</b>
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### Programming:

Strengths: USC strengths included a good variety of evidence-based approaches, use of trained and supervised peer educators, and the building of our collegiate recovery program.

Areas for Advancement:  
We affirm:

- Continue to expand and strengthen alcohol-free programs. Continue to build upon current efforts to create a visible and institutionalized alcohol-free environments and activities.
  - The Carolina Community Coalition developed a work group to assess alcohol-free programs and make recommendations.
  - An Assistant Director for Campus Programs and other programs is in place. We recommend adding this individual to the Coalition.
  - Data shows that students need a consistent place and series of events, not high dollar events.
- Implement more evidence-based selective programming to address high-risk populations.
  - We recommend implementing evidence-based prevention work with intact social groups.
  - We recommend developing programming capacity across campus and address “home grown” programming by developing a programming package which includes marketing and internal education for student leaders, “do this/not that,” how and what to request from Substance Abuse Prevention & Education program, and pre-packaged programs for facilitation by students.

We partially affirm:

- Maintain efforts to discontinue ineffective programs.
  - Student Life and SAPE are working on replacing one-off speakers with creating complex and meaningful speaker experiences with classroom partnerships and meetings with key stakeholders, such as the Leadership and Service Center’s Momentum series.
  - We recommend making sure that any tabling includes interactive educational activities, since USC has a strong tabling culture.

### **Policy:**

Strengths: USC strengths included responsible beverage server training at fraternity and sorority events, its on-campus social function registration, and consistency in policy standards and sanctions.

Areas for Advancement: The committee sees evidence that the institution is acting on these areas, therefore we suggest continuation of:

- Policy enforcement efforts in regards to tailgating on Game Day.
  - The work group is unclear what additional policy steps could be taken given the unique set-up for Game Day lots at USC; USC does not own this real estate and has to work in partnership with these owners. The collaboration between USC and the tailgate lot owners is one of extraordinary cooperation.
- Publicize citations/violations, both in advance of planned enforcement efforts and the actual citations given.
  - Game Day ejection policy and enforcement has been a positive change and well publicized. SLED enforcement activities early in the semester are publicized via the media and social media related to local bar scene.
- Engage student activists

- Student are engaged in policy review and revision.
- Sororities were active in developing a policy in regards to negative events during this biennium.

In addition, the committee would recommend the following actions in this arena:

- Increase policy enforcement by local agencies of underage drinking laws.
- Expand risk management student leadership practices from fraternity and sorority life to other student organizations, especially pre-professional fraternity and sororities.

### **Critical Processes:**

Strengths: USC was praised for its significant advances in resource allocation and data collection since 2011. USC efforts are based on a strategic plan. USC measures outcomes of its program activities, which are chosen based on student needs assessment, strategic planning goals, and validated evaluation.

Areas for Advancement:

We affirm that USC needs to:

- Use the Alcohol Diagnostic Inventory results to create a policy report to be included as part of the EDGAR 86 Biennial Review. Use multiple stakeholders across the university.
- Increase regularity of alcohol policy review. Move from every 3-5 years to more often.
  - Recently, there has been a full review of the Code of Conduct every four years; however, this schedule is not prescribed. Participants include students, faculty, staff, and administrators. Changes are presented to faculty senate and Dr. Pruitt.
  - Fine structure is reviewed annually. Substantive changes are approved by the Board of Trustees.
  - Currently, there is a process that will be collapsing 8 policies together related to campus event management, including the alcohol policy.
- Engage appropriate faculty, staff, student voices, and administrators in policy review, revision, and evaluation process, while keeping senior administrators abreast of progress.
  - The Emergency Management Heat Map is reviewed annually by coalition leadership and advanced to institutional leaders. (Appendix H)
  - Policies that are under review include everything related to event management policy (per first amendment issue), including the 5K policy.
  - Substance Abuse Prevention & Education program has recommended a change to the campus alcohol policy, so that all on-campus alcohol events need a third party vendor.
- In addition, the committee noted the following policy concerns or recommendations:
  - The committee would encourage re-visiting the issue that the current event registration policy has no teeth.

- Exploring how to hold student organizations accountable for alcohol violations. Current fine of \$350 is equivalent to less than \$1/member for most fraternity and sorority chapters.
- Explore how can the Greek report card under development by Fraternity & Sorority Life be inclusive of individual and group conduct rates. Rates of individual alcohol violations can't be accurately reported at this point due to issues with accurate rosters.

### **Institutionalization:**

Strengths: USC strengths include that the President and Vice President for Student Affairs have communicated publicly about the issue of alcohol on multiple occasions, that the university has specific, measurable goals for improving student health and wellness, and that we have an established forum to engage stakeholders in alcohol prevention efforts in the Carolina Community Coalition.

### **Areas for Advancement:**

The committee affirms the recommendations to:

- Secure campus resources for alcohol prevention in the form of:
  - Funding: Currently spend \$2.77 per student compared to a national average of \$4.38 per student
  - Staff: Currently have 1 FTE per 5612 students, where the average is 1 per 4529 students.
  - We note that the Gamecock Recovery Coordinator position has been established since this report.
- The committee suggests that USC look to “right size” the staff and funding to meet or exceed the Alcohol Diagnostic Inventory national levels; all positions do not have to be with the Substance Abuse Prevention & Education program.
- However, we do suggest considering adding resources for campus-based prevention to supplement USC long-standing commitment to coalition/environmental strategies. Specifically, this may include resources or staff to address high-risk group prevention efforts, strategic health communication, Screening, Brief Intervention, and Referral to Treatment (SBIRT) training for faculty and staff, and students leaders, and evaluation.
- Assess resources needed to bring USC's strategic plan and specific, measurable goals for prevention to fruition.
- Engagement of USC constituencies that have historically resisted efforts to address student alcohol problems.

The committee encourages USC to continue:

- Identify venues and opportunities to issue statements that reinforce and promote the vision such as orientation, convocation, letters to incoming students and parents, first-year experience, and periodic emails prior to times known to be higher risk.
- Identify opportunities for senior leadership to reinforce the university's collective role in addressing student alcohol use and communicate the high priority placed on this issue.

- Build support and visibility on issues related to student health and wellness.

### **Recommendations for next Biennium**

After consideration of campus policy, program and behavior data; reviewing the recommendations of the Social Compact and Alcohol Diagnostic Inventory; and considering recent and evolving institutional initiatives, the committee highlights the following recommendations for the next biennium.

The institution needs to act on the Edgar 86 requirements for an annual student notification that is fully compliant. We recommend this as edits to the Annual Security Report, which is already appropriately distributed and is a key institutional communication between students and the university about health and safety topics. Other methods like electronically requiring content review before registration or an all student email would also meet requirements but be more cumbersome. Similarly, the Biennial Review process needs to be continued, with the next review filed by October 1, 2020. The review committee could continue to be part of the Carolina Community Coalition or appointed by the Dean of Students.

The major recommendations include:

1. Consistently communicate messages to the USC community and local community about high-risk drinking from pre-matriculation through alumni status, with a focus on supplementing messages beyond the end of the first semester,
2. Increase communication efforts to enhance and supplement policy enforcement,
3. Enhance current efforts to build consistent late-night programs for the student body and a positive environment for non-drinking students,
4. Implement effective prevention strategies for high-risk students and groups.

The EverFi Alcohol Diagnostic Inventory highlights that USC is dedicating fewer F.T.E. and dollars per student for alcohol prevention efforts than the national average. We recommend that the institution continue its momentum to “right size” its resource allocation toward alcohol and drug prevention efforts. These resources can be strategically brought to bear across enforcement, community relations, prevention, and health and safety campus partners.

### **Goals and Objectives for next Biennium**

The committee specifically recommends the following strategies in pursuit of these recommendations:

- 1) Increase communication efforts to enhance and supplement policy enforcement.
  - a) Increase communications between campus departments and law enforcement agencies to enhance policy enforcement. Explore how USC could consistently receive citations and incident reports from local law enforcement agencies.
  - b) Publicize enforcement efforts to the student body. Increasing the perception that one could be caught violating laws is a strong evidence-based deterrent (Substance Abuse & Mental Health Services Administration). Utilize the Gamecock newspaper, social media,

- and local media to publicize that the campus and the city are enforcing laws and ordinances.
- c) Continue to explore partnerships & communication with local business owners and community stakeholders in pursuit of safe business districts and neighborhoods around campus.
  - d) Publicize enforcement efforts to community stakeholders to raise awareness of both USC and community efforts. USC's involvement in entertainment district issues has revealed that the local community is not aware of USC's extensive commitment to alcohol and drug prevention strategies, including our enforcement activities. Correcting this misperception can decrease reputational risk and increase belief that students will be held accountable.
  - e) Build a flexible and portable presentation about USC's evidence-based efforts for community constituents. Examples could include a 15-minute presentation for a neighborhood association or a 60-minute presentation for a class or community partner's staff meeting.
- 2) Consistently communicate messages to the USC community about high-risk drinking from pre-matriculation through alumni status, with a focus on supplementing messages beyond the end of the first semester.
- a) Map existing messages from orientation, welcome week, University 101, and Alcohol Edu and develop a matrix of additional points of intervention. Explore additional consistent messages after the first semester and develop a plan to further reinforce messages.
  - b) Build education toolkits for use by student groups and student leaders. Target audiences will include fraternity and sorority life groups, honor societies, student organizations, & Resident Mentors. These toolkits can be used by peers with minimal preparation and will increase the quality of information and consistency of university messages by student leaders who may be self-developing content in this area.
  - c) Develop and deliver an effective social norms campaign to promote that most students make healthy choices. Use best practices in campaign design, deployment, and evaluation to maximize effectiveness and insure market saturation.
- 3) Provide consistent late-night programs for students in order to build a positive environment for non-drinking students.
- a) Increasing the capacity of the existing late night options through increased staffing and partnerships is essential.
  - b) Best practices have found that institutions should focus on offerings that include a consistent time and place, rather than high dollar programming that characterized previous national efforts. Efforts should focus on expanding options for "hanging out" and dining after 9 p.m.
  - c) A unified marketing strategy is vital as is featuring late night options during New Student Orientation.
  - d) Continue to offer and publicize Substance Abuse Prevention & Education program's alcohol-free tailgates and CRC programming; engage campus partners to promote and enhance these offerings.

- 4) Increase effective prevention strategies for high-risk students and groups. As a supplement to shaping the campus environment for non and low-risk drinkers, USC should deploy strategies to address high-risk drinkers, particularly in groups where their behavior may be reinforced.
  - a) Develop and deliver evidence-based sessions for student groups that are likely to contain high-risk drinkers. Small group social norms interventions are an example of an effective intervention that has been used with fraternity and sororities when facilitated by a highly trained facilitator. The need to build this capacity may guide position development and professional development within Substance Abuse Prevention & Education program.
  - b) The committee is aware that certain student organizations may function as a high-risk student group without some of the educational and cultural oversight offered to social fraternities and sororities or sport clubs. We recommend exploring, in partnership with the Leadership and Service Center, how to assist non-Fraternity & Sorority Life high-risk student groups. Possibilities include sharing risk management and health information during the re-application process for student organizations or sending messages to advisors from both a “caring for students” perspective and a liability reduction perspective.

## **Conclusion**

In conclusion, the committee hopes that our report will be received as a thoughtful review of the status of USC’s extensive alcohol and drug prevention efforts and a set of actionable goals and objectives for the next biennium. As we have neared the conclusion of our work, the Coalition Steering Committee plans to adopt these recommendations as their strategic plan for the next two years to create a structured implementation strategy. The Coalition chair will be a two-year commitment that includes chairing the biennial review and the first year of implementation, with a chair-elect participating in the development of the following report. Coalition sub-committees will be arranged to advance the goals of the biennial review.



## **Appendices**

### **Appendices:**

- A. Proof of Faculty & Staff & Student Policy Distribution (Annual Security Report 2016 & Email from Jamar Mitchell, USC Human Resources)
- B. Occidental College Final Program Review Determination
- C. Recommended changes to Annual Security Report for Compliance
- D. Alcohol & Drug Survey Inventory
- E. Survey: National College Health Assessment Executive Summaries or Alcohol & Other Drug Report
- F. Survey: Alcohol Edu Summary
- G. Inventory of campus evidence-based strategies
- H. Report: Social Compact Report
- I. Emergency Management HEAT Map
- J. Programs: Substance Abuse Prevention & Education Blueprint
- K. Copy of Everfi Alcohol Diagnostic Inventory Recommendation Reports
- L. Late Night Work Group report



UNIVERSITY OF  
**SOUTH CAROLINA**

Drug-Free Schools and Campuses Regulations [Edgar Part 86]

Biennial Review: Academic Years 2016-2017 and 2017-2018

Appendices

August 31, 2018

## **Appendices**

- A. Proof of Faculty & Staff & Student Policy Distribution (Annual Security Report 2016 & Email from Jamar Mitchell, USC Human Resources)
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## **Appendix A:**

### **Proof of Faculty & Staff & Student Policy Distribution**

Appendix A: Proof of Faculty & Staff & Student Policy Distribution (Annual Security Report 2016 & Email from Jamar Mitchell, USC Human Resources)

Communication from Jamar Mitchell, Employee Relations Manager (July 6, 2018):

Notification of our Drug-Free Workplace policy (HR 1.01) to new employees and annually to continuing employees occurs in multiple ways to ensure compliance:

- Bi-monthly in our New Employee Orientation (see attached dates)
- Temporary employees who do not attend University Orientation are informed through their Division/Department's onboarding process upon hire and review of all applicable University/HR policies
- Through the University's Clery Act Annual Security and Fire Report under the "ALCOHOL AND DRUG POLICIES AND PROGRAMS TO PREVENT ALCOHOL AND DRUG ABUSE" section published and distributed by the Division of Law Enforcement (Sept 28, 2016, Sept 29, 2017, and will be updated again on October 1, 2018).

Mr. Mitchell provided a schedule of 65 New Employee orientations from 2016-2018.

The following pages are excerpts from the 2016 Annual Security Report:

- **How to Support a Survivor:** This presentation was developed to help attendees understand the impact of interpersonal violence, implement strategies to assist interpersonal violence survivors, and refer survivors to the appropriate on- and off-campus resources.
- **SAVIP Services and Reporting:** This presentation covers all of SAVIP's services (advocacy, prevention, and consultation), reporting obligations for responsible employees, how to make an Interpersonal Violence Report, and where to refer students for help.

## TRANSPORTATION OPTIONS

The University maintains an active transit system that operates Monday through Friday. Regular service runs from 7:30 a.m. to 6:00 p.m., with an evening shuttle service operating from 6:00 p.m. to 12:30 a.m. Service is available during Fall and Spring Semesters when classes are in session.

Additionally, the University operates a special on-call late night shuttle between 12:30 a.m. and 6:30 a.m. Monday through Friday when classes are in session. The shuttle is stationed at the Russell House and will pick up riders at their location and deliver them to campus destinations. Those wishing to request service may call (803)777-3351.

Finally, the Iota Mu Chapter of Alpha Phi Omega National Service Fraternity sponsors an escort transportation services to anywhere on campus. APO helps make night travel safer by operating a van that picks up and drops off members of the University community during late night hours. The service is available Monday through Friday 8 p.m. to 12 a.m. when classes are in session. To arrange a pickup, a member of the University community may call (803)777-DUCK or (803)777-3825.

## ALCOHOL AND DRUG POLICIES AND PROGRAMS TO PREVENT ALCOHOL AND DRUG ABUSE

The University of South Carolina treats the abuse of drugs and alcohol as a serious concern. The University is in compliance with the Drug-Free Schools and Communities Act of 1989 and has established the Office of Substance Abuse Prevention and Education (SAPE), under the guidance of the Vice President for Student and Alumni Services.

The University's drug and alcohol policy is made available to all interested parties. Students, faculty, and staff are encouraged to read the entire drug and alcohol policies located in the office of the Vice President for Student and Alumni Services and online at "Substances Abuse Prevention and Education", located at <https://www.sa.sc.edu/sape>. An alcohol and drug education and counseling program is also provided. Additional information is available by calling (803) 777-5781.

The Division of Law Enforcement and Safety (DLES) works closely with the Office of Student Conduct (OSC) and SAPE to educate the student population concerning the responsible use of alcohol. Although every situation is different, officers typically refer student violators of the state's alcohol laws to OSC for counseling and student discipline. Violations of the state's underage drinking laws may be enforced through filing appropriate criminal charges and are usually handled by OSC with a referral from law enforcement. Violations of drug laws are usually handled through the local criminal justice system. The vast majority of first time offenders are usually allowed to enter a diversionary program, referred to as Pre-Trial Intervention, which is coordinated by the local solicitor's office. Student violators of drug laws are also referred to OSC.

## **Policy regarding the possession, use, and sale of alcoholic beverages**

No person under the age of 21 may purchase, possess, or consume any alcoholic beverages, and no person shall sell or give alcoholic beverages to anyone under 21 years of age anywhere at the University of South Carolina – Columbia.

Persons and their guests 21 years of age and older may possess and consume alcoholic beverages in individual campus residence hall rooms or apartments on campus, but not in the communal areas of a residence hall on campus such as lounges, balconies, decks, or bathrooms.

Common source containers of alcohol (e.g., kegs) are not permitted on the University of South Carolina – Columbia premises any time.

All events sponsored by any entity involving alcoholic beverages in University owned or controlled facilities must be registered through the Department of Student Life. Upon submission of the Alcohol Event Registration Form, specific information and requirements will be requested.

Any container of alcohol being transported must be sealed and covered while on University premises.

No person, organization or corporation may sell any kind of alcoholic beverage on the campus of the University, unless there is an alcohol permit to do so.

No alcohol may be served or consumed in any University building or open space except as provided in the Alcohol Event Registration Form. This includes personal consumption as well as consumption at a private party event.

## **Guidelines for Students**

Students must adhere to the Student Code of Conduct and the General Guidelines for the University Community as well as all federal, state, and local laws and ordinances. In addition, students should be aware of the following that under the Family Educational Rights and Privacy Act (“FERPA”), the University may disclose the result of a disciplinary proceeding to a parent or guardian so long as the student is under the age of 21 at the time of the incident and the proceeding has resulted in a violation of University drug or alcohol policies or any federal, state, or local law.

The University may also notify a parent or guardian of a student under the age of 21 of any sanction that places the student on housing or conduct probation (official notice that any additional offense may affect the student's ability to live on campus or attend the University), or that results in removal from University Housing or the institution (e.g., housing removal/relocation, suspension, or expulsion).

The University may also notify a parent or guardian upon a second violation of the University alcohol policy. Finally, the University's Behavioral Intervention Team will notify a parent or guardian of a student under the age of 21 where the consumption of alcohol has resulted in the hospitalization of the student. For more information or for Consent to Release Information waiver, refer to the Office of Student Conduct.

## **Policy regarding the possession, use, and sale of illegal drugs**

The University of South Carolina – Columbia supports strict enforcement of laws concerning the possession, consumption, and distribution of illegal drugs and controlled substances as set forth in the South Carolina Code of Laws, Title 44, Chapter 53. Students, as citizens, are responsible for



knowing about and complying with South Carolina laws concerning illegal drugs and the use of other controlled substances.

Students are responsible for abiding by the Student Code of Conduct and local, state, and federal laws whether on or off campus. Failure to do so can result in criminal, civil, and University proceedings and sanctions. Students and student organizations that are in violation of the law are also violating the Student Code of Conduct and can be held accountable under both separate systems. Violations of the University's Drug Policy as well as other regulations contained in the Carolina Community will be referred to appropriate University offices.

### **Substance Abuse Prevention and Education**

The Substance Abuse Prevention and Education Office (SAPE) is located on the third floor of the Strom Thurmond Wellness and Fitness Center and is open Monday through Friday during regular business hours. SAPE provides resources about alcohol and other drugs including DVDs, flyers, brochures, journal and newspaper articles, and local and nationwide data from surveys. SAPE maintains relationships with and listings of alcohol and drug support groups and resources in the Columbia and Midlands area of South Carolina.

### **Educational Programs**

**Students Taking Initiative and Responsibility (STIR):** The mission of STIR is to help students identify high-risk behavior, reflect on their decision making skills, and take action towards making safer choices and reducing potential negative consequences. The course design is a two-session individualized meeting with SAPE graduate students. Participants are typically sanctioned to the STIR program by their conduct administrators for an alcohol or drug violation, but students may also voluntarily take part to explore their choices about substance use.

**AlcoholEdu:** AlcoholEdu is a required educational program and assessment that measures students' attitudes and perceptions about substance use and abuse. The course is taken in two parts, both of which are completed online. Part I takes about two and a half hours to complete, and is done before the student arrives on campus. Part II takes approximately 15 minutes, and is taken 30-45 days after the first part is completed. All new and transfer undergraduate students must complete AlcoholEdu.

**Haven:** Haven is a required educational and training module about sexual assault prevention. The course uses realistic scenarios and skill-building exercises. Similar in structure to AlcoholEdu, Haven is broken into two parts. Part I takes around an hour and a half to complete. After a 30-45 day waiting period, students must complete Part II, which takes about 15 minutes.

### **CRIMINAL STATISTICS**

#### *How We Compile These Statistics*

A primary part of the Annual Security and Fire Safety Report is the statistics related to crime that have occurred at the University during the preceding calendar year. To assist in evaluating the statistics in context, the preceding three calendar years are provided for your review.



**Appendix B:**

**Occidental College Final Program Review Determination**



August 11, 2017

Jonathan Veitch, Ph.D.  
President  
Occidental College  
1600 Campus Road  
Los Angeles, CA 90041-3314

**Re: Campus Crime Final Program Review Determination**  
**OPE ID: 00124900**  
**PRCN: 201340328581**

Dear President Veitch:

On September 14, 2016, the U.S. Department of Education (the Department) issued a Program Review Report regarding Occidental College's (Occidental; the College) failure to comply with the requirements of the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (*Clery Act*) and the Drug-Free Schools and Communities Act (*DFSCA*). The original text of that report is incorporated into this Final Program Review Determination (FPRD). The College submitted an acceptable response to the Department's initial report on January 18, 2017. Occidental's response and the supporting documentation submitted with the response are being retained by the Department and are available for inspection by the College upon request. Please be advised that this FPRD may be subject to release under the Freedom of Information Act and may be provided to other oversight entities now that it has been issued to the College.

**Purpose:**

Final determinations have been made concerning the findings identified during the program review. The purpose of this letter is to advise Occidental of the Department's final determinations and to close the review. Please note that this FPRD contains several findings regarding Occidental's failure to comply with the *Clery Act* and the *DFSCA*. Because these findings do not result in financial liabilities, they may not be appealed.

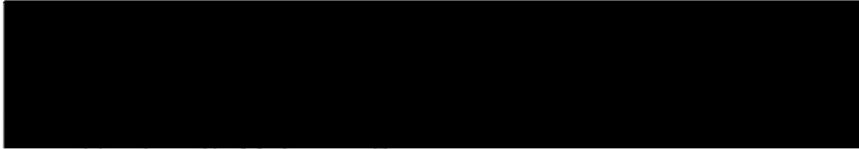
Due to the serious nature of these findings, this FPRD will be referred to the Administrative Actions and Appeals Service Group (AAASG) for consideration of a formal fine pursuant to 34 C.F.R. Part 668, Subpart G. If a fine action is initiated by AAASG, detailed information about the action and Occidental's appeal rights will be provided under separate cover.

**Record Retention:**

Records relating to the period covered by this program review must be retained until the resolution of the violations identified during the review or the end of the regular record retention period applicable to all Title IV records, including *Clery Act* and *DFSCA*-related documents as set forth in *34 C.F.R. §668.24(e)*.

We would like to express our appreciation for the courtesy extended by the officials at Occidental during the program review process. If you have any questions concerning this FPRD or the program review process, please contact Mr. Keith Ninemire on 816-268.0418 or at [Keith.Ninemire@ed.gov](mailto:Keith.Ninemire@ed.gov).

Sincerely,



Candace R. McLaren, Esq.  
Director  
Clery Act Compliance Division

cc: Ms. Rachel S. Cronin, Interim General Counsel, [rcronin@oxy.edu](mailto:rcronin@oxy.edu)  
Mr. Joseph Novak, Interim Chief of Campus Safety, [novak@oxy.edu](mailto:novak@oxy.edu)  
Ms. Veronika Barsegyan, Clery Administrator, [vbarsegyan@oxy.edu](mailto:vbarsegyan@oxy.edu)  
Ms. Gina Becerril, Director of Financial Aid, [gberril@oxy.edu](mailto:gberril@oxy.edu)  
Mr. James Moore, Senior Advisor, Clery Act Compliance Division

Enclosure:

Final Program Review Determination

**Prepared for:**  
**Occidental College**

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**OPEID: 00124900**  
**PRCN: 201340328581**

**Prepared by:**  
**U.S. Department of Education**  
**Federal Student Aid**  
**Clery Act Compliance Division**

**Final Program Review Determination**  
**August 11, 2017**

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## A. The Clery Act and DFSCA

The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (*Clery Act*), in §485(f) of the Higher Education Act of 1965, as amended, (HEA), 20 U.S.C. §1092(f), is a Federal consumer protection statute that provides students, parents, employees, prospective students and employees, and the public with important information about public safety issues on America's college campuses. Each domestic institution that participates in the Federal student financial aid programs under Title IV of the HEA must comply with the *Clery Act*. The institution must certify that it will comply with the *Clery Act* as part of its Program Participation Agreement (PPA) to participate in the Title IV, Federal student financial aid programs.

The *Clery Act* requires institutions to produce and distribute an Annual Security Report (ASR) containing its campus crime statistics. Statistics must be included for the most serious crimes against persons and property that occur in buildings or on grounds that are owned or controlled by the institution or recognized student organizations as well as on adjacent and accessible public property. These crimes are deemed to have been reported anytime such an offense is brought to the attention of an institution's campus police or security department, a local or state law enforcement agency of jurisdiction, or another campus security authority (CSA). A CSA is any institutional official who is 1) designated to receive reports of crime and/or student or employee disciplinary infractions, such as Human Resources and Alternative Dispute Resolution professionals; and/or 2) an official that has significant responsibilities for student life or activities such as residential life staff, student advocacy and programming offices as well as athletic department officials and coaches.

The ASR also must include several statements of policy, procedures, and programmatic information regarding issues of student safety and crime prevention. The *Clery Act* also requires institutions to maintain a Daily Crime Log that is available for public inspection and to issue Timely Warnings and Emergency Notifications to provide up-to-date information about ongoing threats to the health and safety of the campus community. In addition, the *Clery Act* requires institutions to develop emergency response and evacuation plans. Institutions that maintain student residential facilities must develop missing student notification procedures and produce and distribute an Annual Fire Safety Report (AFSR) containing fire statistics and important policy information about safety procedures, fire safety and suppression equipment, and what to do in the case of a fire. Finally, the *Clery Act* amendments that were included in Section 304 of the Violence Against Women Reauthorization Act of 2013 went into effect on July 1, 2015. These provisions are aimed at preventing campus sexual assaults and improving the response to these crimes when they do occur.

The *Clery Act* is based on the premise that students and employees are entitled to accurate and honest information about the realities of crime and other threats to their personal safety and the security of their property. Armed with this knowledge, members of the campus community can make informed decisions about their educational and employment choices and can take an active role in their own personal safety and to secure and protect their personal property. For that reason, the office of Federal Student Aid (FSA) must ensure that the information disclosed in each ASR and AFSR is accurate and complete. FSA uses a multi-faceted approach to ensure that

institutions comply with the *Clery Act*, which includes providing technical assistance and training programs and materials as well as monitoring and enforcement through Program Reviews.

FSA may initiate a campus crime Program Review as a result of a complaint or on public reports about crimes and crime reporting and prevention at a particular institution. FSA has conducted Quality Assurance Reviews in cooperation with the FBI's Criminal Justice Information Service (CJIS) Audit Unit. Program Reviews entail in-depth analysis of campus police and security records and interviews with institutional officials, crime victims, and witnesses. During a program review, an institution's policies and procedures related to campus security matters are also examined to determine if they are accurate and meet the needs of the campus community.

Because more than 90% of campus crimes are alcohol and drug-related, the Secretary of Education has delegated oversight and enforcement responsibilities for the Drug-Free Schools and Communities Act (*DFSCA*), in §120 of the HEA, 20 U.S.C. §1011(i) to FSA. The *DFSCA* requires all institutions of higher education that receive Federal funding to develop and implement a comprehensive drug and alcohol abuse prevention program (DAAPP) and certify to the Secretary that the program is in place. The program must be designed to prevent the unlawful possession, use, and distribution of drugs and alcohol on campus and at recognized events and activities.

On an annual basis, each institution must provide a DAAPP disclosure to all current students (including all students enrolled for any type of academic credit except for continuing education units) and all current employees that explains the educational, disciplinary, health, and legal consequences of illegal drug use and alcohol abuse as well as information about available counseling, treatment, and rehabilitations programs, including those that may permit former students or employees to return following expulsion or firing. The distribution plan must make provisions for providing the DAAPP disclosure annually to students who enroll after the initial distribution and for employees who are hired at different points throughout the year.

Finally, the *DFSCA* requires institutions to conduct a biennial review to determine the effectiveness of its DAAPP to identify areas requiring improvement or modification and to assess the consistency of enforcement actions imposed on students and employees that are found to be in violation of applicable Federal, state, and local drug and alcohol-related statutes or ordinances and/or institutional policies and codes of conduct.

Proper implementation of the *DFSCA* provides students and employees with important information about the detrimental consequences of illicit drug use and alcohol abuse. The conduct of a meaningful biennial review provides the institution with quality information about the effectiveness of its drug and alcohol programs. Any failure to implement these requirements may contribute to increased drug and alcohol abuse on-campus as well as an increase in drug and alcohol-related violent crime. The *DFSCA* is monitored and enforced by the Department.

## B. Institutional Information

Occidental College  
1600 Campus Road  
Los Angeles, CA 90041-3314

Type: Private, Non-Profit

Highest Level of Offering: Master Degree

Accrediting Agency: Western Association of Schools and Colleges

Undergraduate Student Enrollment: 2,062 (Approx. Fall 2016)

% of Students Receiving Title IV: 55% (Approx. Fall 2016)

### Title IV Participation<sup>1</sup>

#### 2015-2016 Award Year

#### Title IV Participation Funding Level:

Federal Direct Loan Program	\$	8,272,678
Federal Pell Grant Program	\$	1,843,612
Federal Perkins Loan Program	\$	704,058
Federal Supplemental Education Opportunity Grant Program	\$	262,500
Federal Work-Study Program	\$	902,844
<b>Total</b>	<b>\$</b>	<b>11,985,692</b>

FFEL/DL Default Rate: 2013 - 0.0 %  
2012 - 2.8 %  
2011 - 2.2 %

Perkins Default Rate:  
6/30/15 - 0.8%  
6/30/14 - 0.0%  
6/30/13 - 2.6%

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<sup>1</sup> Postsecondary Education Participants System (PEPS)



Occidental College (Occidental; the College) offers 31 majors across 40 departments and programs. The Occidental campus consists of more than 50 academic, athletic, residential, and business structures, multiple parking lots/structures, and five sports fields situated on 120 acres in the Eagle Rock community of Los Angeles. The Campus Safety Department employs 12 full-time, unarmed, uniformed officers. The department is comprised of these officers, a Chief, and a *Clery Act* Administrator.

The Campus Safety staff is augmented by a group of on-call officers, as well as contract officers, who assist with College events and other special assignments. Student employees provide safety escorts and office support, and staff the ID checkpoint in the Athletics building. The Campus Safety Department uses a variety of electronic devices including security cameras, fire alarms, intrusion alarms, card access systems, and blue-light emergency phones (which are located throughout the campus). All incoming calls to Campus Safety are electronically logged and recorded.

Campus Safety Department officials represented that the College maintains a close working relationship with the Los Angeles Police Department's Northeast Division, and calls upon the LAPD for support as needed. The review team was advised that Occidental officers communicate regularly with LAPD officers on the scene of incidents that occur in and around the campus area, and work closely with the investigative staff at LAPD when deemed necessary. Campus Safety and the LAPD are in the process of memorializing their working relationship via a formal memorandum of understanding.

### C. Scope of Review

The U.S. Department of Education (the Department) conducted a program review at Occidental from September 23-27, 2013. The review was conducted by the Clery Act Compliance Division. The lead reviewer was Mr. Keith Ninemire.

The objective of the review was to evaluate Occidental's compliance with the *Clery Act*, the HEA fire safety requirements, the *DFSCA*, and the Department's implementing regulations. Occidental was selected for review due to complaints alleging that Occidental is in violation of several provisions of the *Clery Act*. Specifically, the complaints assert that Occidental has failed to accurately and completely disclose statistics of Clery-reportable offenses, as received by the Department. The complainants also alleged that Occidental repeatedly failed to issue Timely Warnings for certain incidents of crime that posed an ongoing threat.

Furthermore, complainants alleged a general failure on the part of Occidental to keep students, employees, other stakeholders, and the larger campus community fully informed about serious crimes and other threats to their safety and security as they would have had, if the College had developed and implemented a comprehensive campus safety plan and a fully-compliant *Clery Act* compliance program. According to complainants, this condition forced crime victims to seek assistance and support from officials outside of the campus safety structures, including faculty members and others, who did not have official public safety or *Clery Act* compliance roles. Complainants reported that this was necessary because the official points of contact were not

helpful and were apt to disregard or minimize the reports and requests for assistance. Some complainants and interview subjects also asserted that there was reluctance among many crime victims to report crimes that occurred off-campus as well due to the close ties between Occidental officials and the local district of the LAPD. The Department notes that local LAPD were not willing to meet with or actively assist the review team with its investigation at any time prior to or during the site visit

The review consisted of an examination of Occidental's campus safety incident reports, arrest records from local law enforcement agencies, and campus disciplinary files. Both random and judgmental sampling techniques were used to select records for this review. Policies and procedures related to the campus safety and *Clery Act* operations were examined and tested. Interviews of institutional officials with *Clery Act* responsibilities were also conducted.

**Disclaimer:**

Although the review was thorough, it cannot be assumed to be all-inclusive. The absence of statements in the report concerning Occidental's specific practices and procedures must not be construed as acceptance, approval, or endorsement of those specific practices and procedures. Furthermore, it does not relieve Occidental of its obligation to comply with all of the statutory or regulatory provisions governing the Title IV, HEA programs including the *Clery Act* and *DFSCA*.

**D. Findings and Final Determinations**

During the review, several areas of noncompliance were noted. The findings identified in the Department's September 14, 2016 Program Review Report appear in italics below. Occidental submitted its official response to the Department's report on January 18, 2017. For the record, it is noted that the College also submitted an interim response on October 14, 2016 to address two specific areas of inquiry. A summary of Occidental's response and the Department's Final Determination appear at the end of each finding. Please note that certain non-substantive edits were made to the text of the initial report.

## **Finding #1: Lack of Administrative Capability**

### **Citation:**

*To begin and to continue to participate in any program authorized under Title IV of the HEA, an institution must demonstrate that it is capable of adequately administering the program under the standards established by the Secretary. Among other requirements, the Secretary considers an institution to have administrative capability if it administers the Title IV, HEA programs in accordance with all statutory provisions of, or applicable to, Title IV of the HEA, and all applicable regulatory provisions prescribed under that statutory authority. 34 C.F.R. § 668.16(a). The Secretary's standards of administrative capability also require that an institution employ "an adequate number of qualified persons" as well as ensure that program activities are undertaken with appropriate "checks and balances in its system of internal controls." C.F.R. § 668.16(b)(2); 34 C.F.R. § 668(c)(1). An administratively capable institution "has written procedures for or written information indicating the responsibilities of the various offices with respect to . . . the preparation and submission of reports to the Secretary." 34 C.F.R. § 668.16(b)(4). These standards apply to all aspects of the Title IV Program regulations including the Clery Act.*

### **Noncompliance:**

*Occidental substantially failed to develop and implement an adequate Clery Act and DFSCA compliance program during the 5-year program review period (2009-2013 calendar years). As substantiated by the violations identified in this report, the College did not have adequate policies, procedures, programs, training initiatives, and systems to comply with Title IV standards of administrative capability. These standards apply to all Title IV operations including the Clery Act and the DFSCA. These findings also strongly indicated that Occidental did not employ an adequate number of qualified staff and did not operate within a system of internal controls sufficient to reasonably ensure compliance with these requirements. The review team also found that these deficiencies were at least in part responsible for the College's failure to provide accurate and complete campus safety and crime prevention information to the students, employees, parents, and other stakeholders including the Secretary.*

*The evidence developed and examined by the Department indicated that Occidental specifically failed to do the following: 1) compile and disclose accurate, complete, and fully-reconciled crime statistics; 2) issue timely warnings to advise campus community members about serious ongoing threats; 3) maintain an accurate and complete daily crime log; 4) develop and then adhere to required campus safety and crime prevention policies and procedures; and, 5) develop and implement effective drug and alcohol abuse prevention programs. The College also did not identify its Campus Security Authorities (CSAs), advise them of their crime reporting obligations, or provide them with a simplified means to report offenses. Such failures call Occidental's ability and/or willingness to properly administer the Title IV, HEA, FSA programs into serious question.*

*Compliance with the Clery Act, the DFSCA and the Department's regulations are specifically required by the terms and conditions of Occidental's Program Participation Agreement (PPA) under which the College participates in the Title IV, HEA, FSA programs. The College's current*

PPA was executed on May 23, 2011 and is effective through March 31, 2017. This PPA was signed by Occidental President, Dr. Jonathon Veitch.<sup>2</sup> The PPA requirements can be found at 34 C.F.R. § 668.14(c).

*Administrative impairments such as those identified during this program review increase the likelihood that the statutes and regulations that govern the Title IV Programs will not be followed. With regard to the Clery Act, such impairment may result in an institution's systemic failure to provide students and employees with important campus crime information and services that are essential to their safety and security. Impaired administrative capability and weak internal controls are an indication that an institution lacks the ability or willingness to comply with Federal regulations.*

**Required Action:**

*As a result of this violation, Occidental was required to take all necessary corrective actions to cure the violations identified in this Program Review Report and to adequately address the organizational weaknesses that contributed to the violations. In addition, the College was required to develop and implement a system of policy and procedure improvements to ensure that these findings do not recur. As part of that process, the College will be required to develop and implement a comprehensive remedial action plan.*

*Based on an evaluation of all available information, including Occidental's response, the Department will determine appropriate additional actions and advise the College accordingly in the Final Program Review Determination (FPRD).*

**Institutional Response:**

In their official response, Occidental management challenged the Department's finding that the College lacked the requisite administrative capability to properly administer the Title IV, FSA programs during the initial and expanded review period (calendar years (CY) 2009 - 2013). Notably, College officials did not offer any specific rationale for their lack of concurrence<sup>3</sup> but did submit extensive documentation about the remedial efforts that were undertaken since the site visit and in response to the Program Review Report. Occidental stated that it was one of many institutions identified for a program review to assess its compliance with the *Clery Act* and *DFSCA*.<sup>4</sup> College officials also claimed that many of the issues identified by the Department

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<sup>2</sup> Occidental was fully recertified on April 24, 2017. The College's current PPA expires on September 30, 2022.

<sup>3</sup> The Department notes that Occidental's response to the Program Review Report registered at least partial disagreement with each finding of violation; however, the College's management did not identify the elements of each finding with which it did not agree nor did they provide any evidence of substantial compliance during the review period. In fact, Occidental conceded to several of the stated violations. In this context, the Department was forced to conclude that the College's partial challenge was grounded in the stated assertions that remedial action was eventually taken. As noted throughout the Program Review Report and this FPRD, each finding is based on specific violations, deficiencies, and other weaknesses that were identified during our examination of documents and other information from the review period. While corrective action is an essential part of the review process, the compliance exceptions documented herein are not in any way ameliorated by subsequent remedial efforts.

<sup>4</sup> The Department notes that Occidental was not selected for review at random. Rather, a determination was made that a review was needed following an assessment of a credible complaint that alleged serious *Clery Act* violations.



occurred five or more years ago and have been addressed as the College's *Clery Act* program has continued to evolve.

The College also asserted that it has developed its program by dedicating resources to the development and implementation of new policies and procedures and the deployment of reliable systems that were not previously in place. While the response did not speak specifically to the violations related to the prior internal weaknesses, Occidental did claim that steps were taken to implement the VAWA requirements and elements of the guidance contained in the 2016 edition of the Department's Handbook. Per the response, the College has identified and trained CSAs and now conducts regular meetings with key stakeholders, including an internal *Clery* Team. The College states that the team is composed of qualified and trained personnel who are assigned specific responsibilities to match skill sets and duties to maximize future compliance.

Finally, Occidental stated that a *Clery* Administrator position was created and staffed and a new well-qualified Chief of Campus Safety was also hired. Occidental officials stated that they believe that the leadership changes and new compliance program will provide reasonable assurance that the violations noted during the review will not recur.

### **Final Determination:**

In Finding #1, the review team found that Occidental lacked the requisite administrative capability required of participating institutions as a result of its failure to develop and implement an adequate *Clery Act* and *DFSCA* compliance program during the review period. The finding was supported by the numerous, serious, persistent, and systemic violations of the *Clery Act* and the *DFSCA* that were identified in the Program Review Report. The regulations governing the Title IV, Federal Student Aid programs establish certain standards that all participating institutions must maintain to be considered administratively capable. To begin or continue to participate in any Title IV, HEA program, an institution must demonstrate that it is capable of adequately administering that program by substantially complying with all statutory and regulatory requirements, including the *Clery Act* and the *DFSCA*.

During the review period, Occidental did not have an effective internal control structure or adequate communication and coordination strategy to facilitate minimally-acceptable levels of compliance. The administrative impairments observed by the review team are set out in the Noncompliance section above and throughout the Program Review Report. Specifically, the review team found that the College substantially and persistently failed to: 1) compile and disclose accurate, complete, and fully-reconciled crime statistics; 2) issue Timely Warnings to advise campus community members about serious ongoing threats; 3) maintain an accurate and complete Daily Crime Log; 4) develop and then adhere to required campus safety and crime prevention policies and procedures; and, 5) develop and implement effective drug and alcohol abuse prevention programs. The College also failed to identify its Campus Security Authorities (CSAs), advise them of their crime reporting obligations, and provide them with a simplified means to report offenses.

During the course of the review, the Department learned that the College delegated most of the responsibility for Clery compliance to the Campus Safety Department even though that unit was already understaffed, inadequately resourced and included no personnel with the requisite *Clery Act* experience or expertise. As noted in the Department's initial report, Occidental failed to employ sufficient staff to carry out required activities and tacitly conceded that officials in place at the time were unaware of many of the College's obligations under Federal law.

The number and extent of the violations identified in the initial report and sustained in this FPRD support the Department's determination that Occidental did not implement an adequate system of checks and balances and did not operate in an environment of basic internal controls during the review period. Furthermore, it is now clear that that the Department's review was the impetus for most of the remedial steps that were eventually taken and that but for the Department's intervention, it is unlikely that few of these actions would have been taken to address longstanding deficiencies. These compliance concerns noted during the review period were significant enough to call Occidental's ability and/or willingness to properly administer the Title IV, HEA, Federal Student Aid programs into serious question. More information about the disposition of the other specific violations is included in the Final Determinations that follow.

To address the administrative impairments noted in Finding #1, the College was required to review and revise its internal policies and procedures related to its campus safety and *Clery Act* compliance programs, and to develop and implement any new policies and procedures needed to ensure that these violations do not recur. In its response, Occidental stated its disagreement with parts of the finding<sup>5</sup> but also asserted that extensive remedial action was undertaken over several years to address the very conditions that were identified during the review.

The Department carefully examined all available information, including Occidental's narrative response and supporting documentation. Based on that review and the College's partial admissions, the Department has determined that the violations identified in the initial finding are sustained. In upholding this finding, it must be noted that records secured and analyzed by the Department make it clear that during the initial review period and after Occidental did not comply with the *Clery Act* as required by its Program Participation Agreement and for a period of time after, failed to take adequate action to address said deficiencies in a manner expected of a competent Title IV fiduciary, keeping in mind that the duties of a Title IV fiduciary extend beyond the management of Federal funds. The violations noted herein substantially and negatively impacted the College's ability to operate an effective campus safety program. In upholding this violation, the Department must emphasize that Occidental and all institutions must be continually vigilant and intentional, both operationally and administratively, to provide reasonable assurance of positive *Clery Act* results that support and enhance its campus safety, crime prevention, fire safety, and substance abuse prevention programs.

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<sup>5</sup> Once again, the Department must note that Occidental did not take substantial exception with any of the Department's presentation of specific violations.

This conclusion is supported further by the following facts: The inadequate control environment at Occidental caused the statistics for incidents of crime that were reported as occurring on Clery Geography to be inaccurate. As the College's response confirmed, 79 previously-undisclosed incidents were identified. Moreover, Occidental management ultimately had to agree that the College failed to issue timely warnings in response to at least four incidents that may have posed an ongoing threat to student and employee health and safety. The problems identified in a relatively small sampling from the College's Daily Crime Log raised similar concerns: the review resulted in the addition of 36 incidents for 2012, 31 incidents for 2013, and two additional incidents for 2014. In yet another example of this trend, the review team confirmed the omission of at least 22 required statements of policy, procedure, practice, and programs in its ASRs and AFSRs produced between 2010 and 2014. Going forward, Occidental, like all institutions, must maintain organizational awareness and intentionality to avoid systemic compliance failures and to create positive *Clery Act* results in the delivery of campus safety, crime prevention, fire safety, and substance abuse prevention services.

Although serious concerns remain, the Department's examination also indicated that the identified violations were, for the most part, satisfactorily addressed by Occidental's responsive documents, including its new and revised internal policies and procedures. On this basis, the Department has determined that the College's corrective action plan meets minimum requirements and for these reasons has accepted the response and considers this finding to be closed for the purposes of this Program Review. Nevertheless, the officials and directors of Occidental are put on notice that they must continue to develop the institution's campus safety program and take any additional necessary action to fully address the deficiencies and weaknesses identified by the Department. This includes intentional and effective action to provide for the proper custody and control of required documentation and other information needed to substantiate Occidental's efforts to comply. Along these lines, such corrective measures must also address any deficiencies that were identified during the preparation of the College's response or as otherwise needed to ensure that these violations do not recur.

Occidental is reminded that the exceptions identified above constitute serious violations of the *Clery Act* that, by their nature, cannot be cured. There is no way to truly "correct" violations of this type once they occur. Occidental asserted that it has taken adequate remedial actions, and that, by doing so, it is now in compliance with the *Clery Act* as required by its PPA. Nevertheless, Occidental officials must understand that any failure to administer the Title IV, FSA programs in accordance with Federal law and the Department's regulations trigger a special concern for the Department and more importantly, serve to deprive students and employees of important campus safety information to which they are entitled. For these reasons, the College is advised that its remedial actions cannot and do not diminish the seriousness of these violations, nor do they eliminate the possibility that the Department will impose an adverse administrative action and/or require additional corrective actions as a result.

## **Finding#2: Failure to Disclose Accurate and Complete Crime Statistics - Part I**

### **Citation:**

*The Clery Act and the Department's regulations require that all institutions that receive Title IV, HEA funds must, by October 1 of each year, produce a comprehensive Annual Security Report (ASR) that contains, at a minimum, all of the statistical and policy elements described in 34 C.F.R. § 668.46(b) and distribute it to all current students and employees.*

*The ASR must be prepared and actively distributed as a single document. Acceptable means of delivery include U.S. Mail, hand delivery, campus mail distribution to the individual, or posting on the institution's website. If an institution chooses to distribute its report by posting to an internet or intranet site, the institution must, by October 1 of each year, distribute a notice to all students and employees that includes a statement of the report's availability and its exact electronic address, a description of its contents, as well as an advisement that a paper copy will be provided upon request. 34 C.F.R. § 668.41(e)(1). The Department's regulations require participating institutions to provide a notice to all prospective students and employees that includes a statement about the ASR's availability, its contents, and its exact electronic address if posted to a website. This notice must advise interested parties of their right to request a paper copy of the ASR and to have it furnished upon request. 34 C.F.R. § 668.41(e)(4).*

*The Clery Act and the Department's regulations require institutions to include statistics for incidents of crimes reported during the three most recent calendar years. The covered categories include criminal homicide (murder and non-negligent manslaughter), forcible and non-forcible sex offenses, robbery, aggravated assault, burglary, motor vehicle theft, and arson. Statistics for certain hate crimes as well as arrest and disciplinary referral statistics for violations of certain laws pertaining to illegal drugs; illegal usage of controlled substances, liquor, and weapons must be disclosed in the ASR. These crime statistics must be disclosed for the following geographical categories: 1) on campus; 2) on-campus student residential facilities; 3) certain non-campus buildings and property; and, 4) certain adjacent and accessible public property. 34 C.F.R. § 668.46(c)(1).*

*Finally, each institution must submit its crime statistics to the Secretary for inclusion in the Department's "Campus Safety and Security Data Analysis Cutting Tool" and the College Navigator. 34 C.F.R. § 668.41(e)(5).*

### **Noncompliance:**

*Occidental did not compile and disclose accurate and complete crime statistics during the review period. This finding is based on documentation provided by the College. In a letter dated March 20, 2014, Department officials requested additional records needed to evaluate the accuracy and completeness of Occidental's crime statistics. Through its outside legal counsel from O'Melveny & Meyers LLP, the College provided a response dated May 2, 2014<sup>6</sup> that*

<sup>6</sup> The title of this binder is "Request 2" which is the second item identified in the Department's letter to Occidental, dated March 20, 2014.



*included a binder of documents labeled as a "complete and accurate Audit Trail" of Clery-reportable crimes for calendar years 2009–2012.*

*On page three of the binder, Occidental stated that a total of 25 reportable forcible sex offenses occurred on the College's "Clery Geography" in calendar year 2010; 24 on-campus, 20 of those within on-campus residence halls, and one at a non-campus location. Contrary to this admission, the College inaccurately submitted the following information to the Departments' Campus Safety and Security Data Analysis Cutting Tool (CSSDACT) for 2011–2012:*

- 1) Total forcible sex offenses On-campus 2010: 7 reported - 24 should have been reported.*
- 2) Forcible sex offenses within On-campus residence halls 2010: 3 reported - 20 should have been reported.*
- 3) Forcible sex offenses within Non-campus buildings and properties 2010: 0 reported- 1 should have been reported.*

*In addition to the above, the College reported in its 2014 ASRs revised crime statistics for the calendar years 2011 and 2012 that were previously underreported sexual assaults and other crimes in the following years and added these additional numbers in their report:*

- 1. Adds 4 cases of Sexual Assault in 2012.*
- 2. Adds 1 case of Robbery in 2012.*
- 3. Adds 1 case of Sexual Assault in 2011.*
- 4. Adds 1 case of Auto Theft in 2011.*
- 5. Adds 1 case of Weapons Referral in 2011.*
- 6. Adds 1 case of Sexual Assault in 2009.*
- 7. Adds 1 case of Aggravated Assault in 2009.*

*Failure to compile and disclose accurate and complete campus crime statistics violates one of the most foundational requirements of the Clery Act. Reporting violations of this type deprive interested parties of access to important campus safety information to which they are entitled and calls the College's ability and willingness to properly administer the Title IV, FSA program in to serious question.*

#### ***Required Action:***

*Occidental was required to take all necessary corrective actions to rectify this violation and all others identified in this Program Review Report. The College was to address each of the classification and disclosure exceptions noted above. In addition, as discussed below, the College must re-examine all crime statistics disclosed during the review period and in calendar years 2013, 2014, and 2015. The Department's review and Occidental's admissions strongly indicate that there was a serious flaw in the crime statistics that were included in ASRs and that were submitted to the CSSDACT over several years. As such, additional work is needed to determine the extent of the problem as the first step in developing a meaningful corrective action plan that will provide reasonable assurances that such violations will not recur.*

*To address the deficiencies identified above, Occidental must:*

- Conduct a thorough review of all incidents of crime reported to the Campus Safety Department, other security-related officials and offices, any office that students and employees are directed to report matters of crime or that administer student or employee disciplinary programs, such as the Office of Human Resources, and/or to any other CSAs. Similarly, the College must contact all local law enforcement agencies with concurrent jurisdiction to request all necessary records to ensure that all incidents of Clery-reportable crimes were identified and classified correctly and that any and all reporting errors have been corrected. Occidental also must ensure that crimes evidencing that a victim was targeted for crime on the basis of actual or perceived membership in a covered class are disclosed as hate crimes. This requirement applies to all of the violations identified above and all others identified by Occidental during the conduct of the institutional self-study and in the preparation of its response. As part of its response, Occidental must also verify that the crime statistics for all Clery-reportable incidents were categorized and disclosed in accordance with the geographical classifications defined in 34 C.F.R. § 668.46(c)(4).
- Develop appropriate policies and internal controls to ensure that all officials charged with compiling the required crime statistics request information from all CSAs and local law enforcement agencies and that the College provides and publishes complete and accurate crime statistics. In addition, the College must develop and implement procedures to ensure that CSAs receive appropriate regular training. Finally, the College must design and deploy an effective crime statistics data request and collection mechanism for CSAs.
- Review all of the College's real estate holdings and ensure that it has correctly applied the Clery Act's geographical definitions to all properties owned or controlled by Occidental including all undeveloped property and lands that are used for any direct or indirect educational purpose. Similarly, the College must also review the status of all buildings and properties that are owned or controlled by any recognized student organizations and apply the campus and non-campus property definitions of the Clery Act to each property. Based on the findings of its review, Occidental must re-evaluate the adjacent and accessible public property boundaries that apply for Clery Act reporting purposes. The College must revise its maps and patrol zones in accordance with its findings. These findings must also be used to determine if all campus, non-campus buildings and property, and all adjacent and accessible public property were properly defined during each of the calendar years in the expanded review period and if all required crime statistics were compiled and disclosed as required. A copy of the property lists and any and all documents, reports, and other work papers created during the College's internal review and its application of the geographical definitions must accompany its official response to this Program Review Report. These documents must identify any errors and omissions identified during the review as well as an explanation of all actions that were or will be taken to address violations and weaknesses.
- Construct clear audit trails that substantiate the accuracy and completeness of its revised crime statistics through calendar year 2014. The audit trails must support the corrected

*crime statistics for all Clery crime classifications including Part I Offenses, hate crimes, and drug law violation (DLV), liquor law violation (LLV), and weapons law violation (WLV) arrests and disciplinary referrals. The Department will not impose strict requirements as to the exact form of the audit trail so long as it provides the incident report numbers associated with each crime classification broken down by the requisite geographical categories for each calendar year.*

- *Review and improve its policies, procedures, internal controls, and training programs to ensure that going forward, all incidents of crime reported to the Campus Safety Department security-related officials, CSAs, and local law enforcement agencies are properly classified in accordance with the definitions in Appendix A to Subpart D of 34 C.F.R. Part 668 and are included in its ASR statistical disclosures.*

*Based on an evaluation of all available information, including Occidental's response, the Department will determine appropriate additional actions and advise the College accordingly in the FPRD.*

#### **Institutional Response:**

In their official response, Occidental management disagreed in part and concurred in part with this finding. The College, as part of the required actions, initiated a review of its crime records for CY 2012 through 2015, and found and corrected 79 under-reported crimes and 236 over-reported crimes. As such, in total, the College committed a total of 315 errors in its disclosing of its crimes statistics to the Department and its college community over this four year period.

Per the response, the College claimed that it took several steps to ensure that future crime reporting will be accurate and complete. Additionally, Occidental indicated that it has provided information regarding its improved policies and procedures, increased staffing, and enhanced training. Finally, officials asserted that they reviewed and updated its Clery Geography and properties as requested by the Department.

#### **Final Determination:**

Finding #2 cited Occidental for multiple violations of the *Clery Act* and the Department's regulations, as outlined in the Noncompliance section above. Specifically, the review team found that the College failed to compile and submit timely, accurate, and complete crime statistics to the Department and in the College's AFSSRs<sup>7</sup> for CYs 2009, 2010, 2011, 2012, 2013, 2014, and 2015.

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<sup>7</sup> For clarity, the Department consistently refers to the reports that institutions are required to produce and distribute for *Clery Act* and HEA compliance purposes as the Annual Security Report (ASR) and the Annual Fire Safety Report (AFSR). While these are the widely-acknowledged and conventional titles for these reports, institutions are free to use another title so long as it is clear that the report(s) were created to meet the Federal requirement(s). Occidental chose to give its combined ASR/AFSR the title of the "Annual Fire Safety and Security Report (AFSSR)." The reports produced by the College and examined by the review team are referred to in this FPRD alternatively using both naming conventions.

As a result of this violation, Occidental was required to develop and implement substantive policies and procedures to ensure that timely, accurate crime statistics are submitted to the Department in accordance with 34 C.F.R. § 668.41(e)(5). In its response, the College concurred in part and disagreed in part with the finding, and submitted documentation in support of its claims. In a review of its own statistics, the College found 315 reporting errors in the CYs 2012 through 2015, which supports the Department's determination that the College lacked the requisite Administrative Capability to comply.

The Department carefully examined all available information, including Occidental's narrative response and supporting documentation. Based on that review and the College's partial admissions, the Department has determined that each of the violations identified in the initial finding is sustained. The examination indicated that the identified violations were, for the most part, satisfactorily addressed by Occidental's updated policies and procedures put forth in its 2016 AFSSR. As such, the Department has decided that the College's corrective action plan meets minimum requirements. For these reasons, the Department has accepted Occidental's response and considers this finding to be closed for the purposes of this Program Review. Nevertheless, College officials and directors must take all other action that may be necessary to address the deficiencies identified by the Department, as well as any additional deficiencies and weaknesses that were detected during the preparation of Occidental's response, and/or as may be needed to otherwise ensure that these violations do not recur.

Occidental is once again reminded that the exceptions identified above constitute serious and persistent violations of the *Clery Act* that, by their nature, cannot be cured. There is no way to truly "correct" a violation of this type once it occurs. Timely submission of accurate crime statistics to the Department is among the most basic requirements of the *Clery Act* and is fundamental to its campus safety goals. Access to this information permits campus community members and their families to make well-informed decisions about where to study and work and empowers individuals to play a more active role in their own safety and security. The College asserted that it has taken adequate remedial actions, and that, by doing so, it is now in compliance with the *Clery Act* as required by its PPA. Nevertheless, Occidental is advised that its remedial actions cannot and do not diminish the seriousness of these violations, nor do they eliminate the possibility that the Department will impose an adverse administrative action and/or require additional corrective actions as a result.

### **Finding #3: Failure to Properly Disclose Accurate and Complete Crime Statistics - Part II**

#### ***Citation:***

*The Clery Act and the Department's regulations require that institutions participating in the Title IV, HEA programs compile and disclose crime statistics for the three most recent calendar years concerning the occurrence on campus, in or on non-campus buildings or property, and on public property of the following that are reported to police agencies or to a campus security authority: criminal homicide, manslaughter, forcible and non-forcible sex offenses, robbery, aggravated assault, burglary, motor vehicle theft, and arson. In addition, institutions must disclose arrests for liquor law violations, drug law violations, and illegal weapons possession.*



34 C.F.R. § 668.46(c)(1)(viii). The Department's regulations require that, for Clery Act reporting purposes, participating institutions must compile crime statistics using the definitions of crimes provided in Appendix A to Subpart D of the Department's General Provisions Regulations. 34 C.F.R. § 668.46(c)(7).

**Noncompliance:**

Occidental failed to compile and disclose accurate and complete crime statistics for calendar years 2012 and 2010. The Department selected samples of incident reports and determined that three (3) incident reports were misclassified, thus affecting the accuracy of the reported crime statistics.

**Calendar Year 2012**

1. **Incident No 12-0607** Classified as Harassment - should have been classified as Hate Crime Offense / Intimidation. Complainant was surrounded by five or six males who started to call him sexually orientated slurs. This placed the complainant in "reasonable fear" causing him to quickly retreat from the area. Intimidation occurred when the suspect was surrounded, which unlawfully placed the suspect in reasonable fear of bodily harm, even though no weapons were displayed and the complainant was not physically attacked. This would result in an underreporting of Hate Crime/Intimidation.

**Calendar Year 2010**

2. **Incident No 9974888** Classified as Grand Theft Building - should have been classified as Burglary. A laptop computer was stolen from a residence hall room during Winter Break. This incident meets the three conditions for a Burglary. This would result in an underreporting of burglaries.
3. **Incident No 9975053** Classified as All Other Thefts - should have been classified as Burglary. Victim's wallet containing approximately \$300 was stolen from her desk drawer inside her residence hall room. This incident meets the three conditions for a Burglary. This would result in an underreporting of burglaries.

Failure to compile and disclose accurate and complete crime statistics and to include this data in the ASR and in submissions to the CSSDACT violates the Clery Act and the College's PPA.

**Required Action:**

As a result of these violations, Occidental was required to review each of the cited incidents of crime and then either reclassify the incident or provide an explanation of why the original crime classification was correct. If the College believes that the original classification should be maintained, it must provide a clear articulation for its position and submit credible information and documents in support of its claims. Furthermore, Occidental must modify its campus crime statistics as needed to address any deficiencies. Finally, the College must develop procedures

*that will ensure that all incidents of crime reported will be classified in accordance with Clery Act program definitions. A copy of those procedures was to be submitted with the College's response. The response to this finding may be incorporated into the detailed file examination that is required under Finding #2 at the discretion of management.*

*Based on an evaluation of all available information, including Occidental's response, the Department will determine appropriate additional actions and advise the College accordingly in the FPRD.*

### **Institutional Response:**

In their official response, Occidental management disagreed in part and concurred in part with this finding. Concerning the first incident in 2012, No. 12-0607, the institution disagreed with the Department that it had been misclassified. Asserting its original assessment that the victim never feared for his safety and did not report the incident to law enforcement or Campus Safety, the institution determined that this incident did not qualify as "intimidation."

In the second incident, No- 9974888, Occidental admitted that it had misclassified this crime in its incident report. However, the College states that it was correctly classified and counted as a Burglary in its original 2010 statistics.

Lastly, the third incident, No- 9975053, was recorded as a theft. The College stands by this original determination as it asserts that there was no evidence of unlawful access to the location as the victim had allowed her friends in her room even when she was not present.

### **Final Determination:**

Finding #3 cited Occidental for multiple violations of the *Clery Act* and the Department's regulations, as outlined in the Noncompliance section above. Specifically, the review team found that the College had misclassified crimes, and, as a result, these crimes were never included in the statistical disclosures that appeared in the 2010 and 2012 AFSSRs or in the data submissions to the CSSDACT. As a result of these violations, the College was required to review and revise its internal policies and procedures related to its campus safety and *Clery Act* compliance programs and to develop and implement any new policies and procedures needed to ensure that these violations do not recur. In its response, Occidental asserted that all necessary action was taken to address the violations identified during the review. Once again, the College concurred in part and disagreed in part with the finding while noting that specific action was taken to prevent recurrence.

With regard to incident No - 12-0607, the Department take note of the College's rationale but finds the College's claim that the offense was not a Hate Crime to be unpersuasive. Even though the victim did not report the incident, the incident was reported to a CSA by the victim's mother on the very same night that it occurred. Moreover, in the narrative of Occidental's incident report, the victim was asked if he was gay. When he stated, "No," and attempted to walk away, he was quickly surrounded by five to six subjects who began a series of verbal taunts, calling

him a “faggot,” and “gay.” The victim was able to squeeze by them, and ran away, crying. From this summary, the Department finds that this incident was fear-inducing, intimidating, and threatening and as such, the violation is sustained.

In the second incident, No - 9974888, the College admits that it improperly labeled the crime as “Grand Theft Building” and classified it as “Larceny-Theft” in both its Computer Assisted Dispatch (CAD) report and in the actual crime report of the incident. However, the College points out that, in the narrative, it did label the incident as a “Burglary,” and reported it as such in its 2010 AFSSR. The Department has re-examined this incident and agrees with the College. This violation is not sustained.

In the last example, Incident No-9975053, the College states that it stands by its original classification of the incident as a “theft” as opposed to a “Burglary.” The College cited a lack of evidence of unlawful entry since the victim allowed her friends access to her room even when she was not present. From this explanation, it is clear that the College assumes that a friend of the victim stole her wallet, but, the responsible party was never apprehended in this case. Generally, if an item is missing from a structure, if the individual who took the item is unknown, and if the investigating officer has exhausted all avenues to identifying the perpetrator, the proper classification is Burglary.<sup>8</sup> The Department finds Occidental’s argument in this regard to be unpersuasive and as such, the violation is upheld.

The Department carefully examined all available information, including Occidental’s narrative response and supporting documentation. Based on the analysis detail above, the Department has determined that two of the three violations identified in the noncompliance section of the initial finding are sustained.<sup>9</sup> This examination also indicated that the identified violations were, for the most part, satisfactorily addressed by Occidental’s new and revised internal policies, procedures, and systems as detailed in the response. As such, the Department has decided that the College’s corrective action plan meets minimum requirements. For these reasons, the Department has accepted Occidental’s response and considers this finding to be closed for the purposes of this Program Review. Nevertheless, College officials and directors must take all other action that may be necessary to address the deficiencies identified by the Department, as well as any additional deficiencies and weaknesses that were detected during the preparation of Occidental’s response, and/or as may be needed to otherwise ensure that these violations do not recur.

Occidental is once again reminded that the exceptions identified above constitute serious violations of the *Clery Act* that, by their nature, cannot be cured. There is no way to truly “correct” violations of this type once they occur. Occidental asserted that it has taken adequate remedial actions and that by doing so, that it is now in compliance with the *Clery Act* as required by its PPA. Nevertheless, Occidental officials must understand that any failure to publish and distribute an accurate and complete AFSSR deprives students and employees of important campus safety information to which they are entitled. For these reasons, the College is advised that its remedial actions cannot and do not diminish the seriousness of these violations nor do

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<sup>8</sup> See 2005 Handbook, page 36.

<sup>9</sup> The component of the finding related to Incident #9974888 is not upheld.

they eliminate the possibility that the Department will impose an adverse administrative action and/or require additional corrective actions as a result.

#### **Finding #4: Timely Warning Issuance and Policy Violations**

##### **Citation:**

*Under the Clery Act an institution must issue timely warnings to the campus community to inform affected persons of crimes considered to be a threat to students and employees. See §485(f)(3) of HEA. These warnings must be issued to the campus community in any case where an incident of crime listed in 34 C.F.R. § 668.46(c)(1) or (c)(3) that may pose a serious or ongoing threat to students or employees and is reported to a campus security authority. 34 C.F.R. § 668.46(e). An institution's ASR must include detailed information about the issuance of timely warnings. 34 C.F.R. § 668.46(b)(2)(i).*

##### **Noncompliance:**

*Occidental did not comply with the timely warning provisions of the Clery Act and also failed to adhere to its own policy and procedures for the issuance of such warnings. Specifically, Occidental did not issue timely warnings for reports of Clery-reportable crime that did in fact pose a serious or ongoing threat to students, employees, and the broader campus community. Moreover, the College did not include accurate and/or essential details about such threats in some of the warnings that were issued. This finding is based on a careful examination of the College's "alert notices," the title used at Occidental for timely warnings, as well as the corresponding crime incident reports, daily crime logs, Campus Safety's Watch Commander's Log, and policies and procedures that were disclosed in ASRs for the calendar years 2009 through 2012. Furthermore, the contents of Occidental's timely warning notices were often so vague as to constitute a failure to provide actual notice of the dangerous condition. For example, some notices did not include pertinent information such as the date and time of the incident. In other cases, references to key facts in certain timely warnings did not match the information, such as the dates and geographic sites of a crime, that were found in the corresponding incident reports, daily crime logs, or Watch Commander's Log (a record of all incidents that were reported to Campus Safety throughout each shift).*

*A selection of Occidental's timely warning violations are described in the paragraphs below.*

*In the first example, Occidental violated timely warning provisions of the Clery Act when it did not issue a timely warning for the report of a sexual assault on a high school student that took place on its campus in 2012. This crime constituted both a serious and an ongoing threat to students and employees on the campus.*

*A summary of the crime incident report is provided below.*

- **Incident #12-0574 (Forcible Sexual Assault)** - On Wednesday, May 23, 2012, at approximately 7:40 a.m., an alleged sexual assault occurred on Gilman Road while an



*Eagle Rock High School (ERHS) student walked through Occidental's campus on her way to school. An unknown man groped the student's breasts and buttocks and abruptly walked away from the victim. The crime incident was reported to Campus Safety by an ERHS teacher at approximately 8:30 a.m. on the same day that the crime occurred.*

*The facts of the case clearly show that a warning should have been issued. These include the fact that this was a stranger attack that was reported immediately (within one hour of occurrence). The documents analyzed by the review team also show that the alleged assailant was last seen on campus property fleeing from the victim and his whereabouts quickly became unknown.*

*As noted above, Occidental's inaction in this case not only violated the Clery Act, but also was contrary to the College's policies and procedures that were included in the ASR. Note the following excerpt from the timely warning policy disclosure that was included in Occidental's 2010, 2011 and 2012 ASRs:*

*"In the event that a situation arises, either **on or off campus**, that, in the judgment of the director of Campus Safety, constitutes an ongoing or continuing threat, a campus-wide "timely warning" will be issued. Depending on the severity of the situation, the warning may trigger activation of all or part of the Oxy Alert system – a multilayered approach using siren, voice-mail, e-mail, and website notifications. Students enroll in Oxy Alert during clearance at the start of each semester; faculty, staff, and administrator enroll at the MyOxy section of the College website."*  
*Guide to Campus Safety 2012-2013; 2011-2012, and 2010-2011.*

*This statement indicates that timely warnings will be issued for on or off campus incidents that are determined to be an ongoing or continuing threat to the safety of its students and employees. The Department notes that while institutions are not generally required to issue timely warnings for offenses that do not occur on their so-called "Clery Geography," institutions will be held to the policy statements that are included in the ASR. In many cases, it is sound policy to issue warnings for areas beyond an institution's Clery Geography, especially in cases where a significant number of campus community members, live, work, or park off-campus or otherwise are required to traverse areas that are not specifically within the geographical confines of the campus. However, when an institution makes a representation in the ASR that warnings will be issued for an expanded area then that institution will be held to that standard for compliance monitoring and enforcement purposes. The Department notes that Occidental officials claimed that the policy is further enabled by the fact that the Campus Safety Director lives in nearby campus housing and that as a result, is able to respond personally and promptly to reports of serious incidents of crime, including "a crime of violence, like an armed robbery." The expectation then would be that the incident above, as well as those summarized below, would have resulted in the issuance of an informative and timely notice to the campus community. In the second example, Occidental delayed the issuance of an alert notice for an armed robbery that occurred off-campus, but within the patrol zone. In this case, the warning was not issued*

*until the next day, Sunday, November 22, 2009, at 9:43am, approximately seventeen hours after the crime was reported to Campus Safety. According to the crime incident report, the crime occurred on Saturday, November 21, 2009, at approximately 4:40pm and was reported to Campus Safety at the approximate time and date that the crime occurred.*

*The following paragraph summarizes the College's crime incident report. Passages in the incident report revealed imminent danger to the campus community existed from the time that the crime incident was reported to Campus Safety.*

- **Incident #9973674 (Robbery)** – *On Saturday, November 21, 2009, at approximately 4:40pm, a student called his mother to report that he had "just been mugged" while walking to campus from the CVS drug store that is located on York Boulevard. The mother was unable to immediately reach him so she immediately reported the crime to Campus Safety. Safety officers immediately searched the parking lot of the CVS and the streets nearby the drug store and the campus and found officers from the Los Angeles Police Department (LAPD) speaking with the victims, two male students.*

*The crime occurred within two and half blocks of Occidental's campus, adjacent to 4523 Alumni Avenue, where a resident witnessed the crime. Three suspects in a car approached the two students. One of the suspects got out of the car and raised his t-shirt to expose something that resembled a handgun and then ordered the students to place their personal items on the ground. The students complied and were robbed of their cell phones, debit cards, a library card, wallets, a dormitory key, and an identification card. The suspects got into the car and made a right turn on Avenue 45 toward Eagle Rock Boulevard. The student called 911 and his mother from a witness' telephone.*

*One suspect was described as a Hispanic male, 18 to 20 years of age, approximately 5'7", with a weight range of 150 to 160 pounds, short gelled hair, and wearing a black t-shirt with baggy blue jeans. The second suspect was described as a Hispanic male, 18 to 20 years of age, approximately 5'9" and roughly 175 pounds, and wearing a gray hooded sweatshirt. A description of the driver was not provided.*

*In a third example, Occidental did not issue a timely warning for another armed robbery that occurred on Monday, November 23, 2009. This crime was very similar to the offense described above in terms of location, description of the assailants, as well as in several other respects. A synopsis of the crime incident report is presented below.*

- **Incident #997377 (Robbery)** – *On Monday, November 23, 2009, an armed robbery occurred off-campus in front of 4556 Alumni Avenue. A witness reported the crime to the LAPD that same day at approximately 12:35pm. Dispatch from LAPD subsequently reported the crime to Campus Safety and provided a description of the suspects as two Hispanic males, approximately 18 to 20 years of age. Campus Safety officers proceeded to meet LAPD officers at York and Avenue 45. Two witnesses told Campus Safety officers that they chased the robbers on foot. One robber brandished a knife in his waistband and commanded the victim to place his iPod on the ground. The victim complied and*

*walked away. The witnesses lost the robbers during the chase at Eagle Rock Boulevard and subsequently called LAPD. An LAPD Unit found the victim and brought him to Campus Safety officers at York and Avenue 50. The victim confirmed he had been robbed while walking east on Alumni toward the Campus. The LAPD subsequently set-up a search perimeter for the suspect. The search result was negative.*

*Clearly, the similarities between these incidents should have resulted in the issuance of a timely warning as required by the Clery Act and the College's policy.*

*The fourth example revealed that Occidental issued a timely warning in an untimely manner to all members of its campus community for a robbery that occurred on public property within Clery-geography in the 1600 block of Campus Road. According to the timely warning notice, the robbery was reported to Campus Safety on February 20, 2009, at approximately 10:30pm. Occidental did not issue the warning until the next business day, on February 21, 2009 at 8:32am, approximately ten hours after the crime was reported to Campus Safety. A passage in the timely warning notice also revealed that "no weapons were alluded to or seen;" however, the information conflicted with Campus Safety's Watch Commander's Log, which revealed a weapon was produced to commit the robbery and no injuries occurred.*

*Failure to issue timely warnings about serious and ongoing threats deprives campus community members of access to vital, time-sensitive information to which they are entitled. Timely warnings are a primary means of providing updates about serious threats to the health and safety of campus community members. This essential information allows interested parties to make informed decisions regarding their own safety and security and supplements the longitudinal statistical data that is included in the ASR.*

#### ***Required Action:***

*As a result of this violation, Occidental was required to review and revise its current timely warning policy. In accordance with 34 C.F.R. § 668.46(e), Occidental was to develop and implement policies and procedures to facilitate the timely issuance of warnings for all Clery-reportable crimes that may pose a serious or an ongoing threat to the campus community. Occidental was also required to include in its policy statement for the making of timely warnings all of the required Clery geography that is prescribed by the Clery Act.*

*Occidental was required to ensure the accuracy of dates, times, and geographic locations in its daily crime logs and incident reports to ensure that the information in its timely warnings is accurate and complete. Occidental was required to consider the range of factors that will influence its process for determining if a warning will be issued, the timing of the notice, the means/media by which it will be disseminated and then incorporate this information into its policies and procedures.*

*A copy of the revised policies and procedures were required to accompany the College's response to this Program Review Report. Once the revised policies and procedures have been*

*evaluated by the Department for conformity with the Clery Act, Occidental will be permitted to incorporate the required changes into its next regularly-scheduled ASR.*

*Based on an evaluation of all available information, including Occidental's response, the Department will determine appropriate additional actions and advise the College accordingly in the FPRD.*

**Observation:**

*While not a finding of violation per se, the review team observed that Occidental included conflicting information in certain incident reports and timely warnings. For example, the following facts were noted in the documents related to an armed robbery that occurred at a near-campus location. Campus Safety issued a timely warning notice that revealed the robbery was reported on March 19, 2010; however, the corresponding crime incident report showed that the incident was reported on July 8, 2010. Further in the narrative of that same crime incident report, the reported date of the crime was disclosed as March 19, 2010. The Department checked Campus Safety's Watch Commander's Log and found an entry in the log that indicated the student reported the robbery occurred on March 19, 2010, the same day the crime occurred. Such errors can adversely affect the efficacy of Occidental's timely warning procedure and otherwise compromise its campus safety and Clery Act compliance program.*

**Institutional Response:**

In their official response, Occidental management disagreed in part and concurred in part with this finding. However, College officials did submit copies of its revised and more detailed timely warning policies and procedures to demonstrate that it has corrected all failures that lead to its improper issuance of timely warnings. Regarding the four incidents cited, the College agrees that a timely warning should have been issued in Examples #1 and #4; however, it disagreed that the incidents cited in Examples #2 and #3 required timely warnings, arguing that it should not need to follow its own timely warning policy as it is broader than the Federal requirement. In summary, the College agreed that it should have issued a timely warning in the incidents noted in Examples #2 and #3; however, it disagrees that its failure to do so constituted a violation of the *Clery Act*.

**Final Determination:**

Finding #4 cites Occidental for multiple violations of the *Clery Act* and the Department's regulations, as outlined in the Noncompliance section above. Specifically, the review team found that the College failed to comply with the timely warning provisions of the *Clery Act* and for failing to adhere to its own policy and procedures for the issuance of timely warnings. As a result of these violations, the College was required to review and revise its internal policies and procedures related to its campus safety and *Clery Act* compliance programs, and to develop and implement any new policies and procedures needed to ensure that these violations do not recur. In its response, Occidental asserted that all necessary action has been taken to address the violations identified during the review. The College agreed that it failed to issue required timely



warnings in Examples #1 and #4 as discussed above, but disagreed that it was noncompliant with respect to Examples #2 and #3. The College does agree that under its own Timely Warning Policy as stated in its ASR, it should have issued a timely warning in the examples #2 and #3. However, the institution states that it was not until the publishing of the 2011 Handbook that the Department clarified that an institution would become noncompliant if it failed to uphold its own policy that required the College to do more than the minimum requirements of the *Clery Act*.

The Department finds Occidental's arguments that it should not be held accountable for establishing a detailed procedure regarding the issuance of timely warnings to be entirely unpersuasive. While clarification was provided in the 2011 Handbook as the College noted in its response, this topic was addressed in the earlier 2005 Handbook<sup>10</sup>, which stated: "Remember that your statements or descriptions of policies must accurately reflect your institution's current procedures and practices."

The Department carefully examined all available information, including Occidental's narrative response and supporting documentation. Based on that review and the College's partial admissions, the Department has determined that the four violations identified in the initial finding are sustained. This examination also indicated that the identified violations were, for the most part, satisfactorily addressed by Occidental's new and revised timely warning policies, procedures, and systems as detailed in the response. As such, the Department has decided that the College's corrective action plan meets minimum requirements. For these reasons, the Department has accepted Occidental's response and considers this finding to be closed for the purposes of this Program Review. Nevertheless, College officials and directors must take all other action that may be necessary to address the deficiencies identified by the Department, as well as any additional deficiencies and weaknesses that were detected during the preparation of Occidental's response, and/or as may be needed to otherwise ensure that these violations do not recur.

Occidental is once again reminded that the exceptions identified above constitute serious violations of the *Clery Act* that, by their nature, cannot be cured. There is no way to truly "correct" violations of this type once they occur. Occidental asserted that it has taken adequate remedial actions, and that, by doing so, it is now in compliance with the *Clery Act* as required by its PPA. Nevertheless, Occidental officials must understand that any failure to issue timely warnings, emergency notifications, and other crime and safety alerts in accordance with Federal law and the institution's own policies and procedures deprives students, employees, and the wider campus community of important campus safety information to which they are entitled. For these reasons, the College is advised that its remedial actions cannot and do not diminish the seriousness of these violations nor do they eliminate the possibility that the Department will impose an adverse administrative action and/or require additional corrective actions as a result.

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<sup>10</sup> The Department points out that the finding as to these incidents would have been upheld in all cases based on the facts and the law. The treatment of the topic in any sub-regulatory guidance is not in any regard, dispositive.

## **Finding #5: Failure to Maintain an Accurate and Complete Daily Crime Log**

### **Citation:**

*The Clery Act and the Department's regulations state that institutions participating in the Title IV, HEA programs maintain a daily crime log. An institution that maintains a campus police or a campus security department must maintain a written, easily understood daily crime log that records, by the date the crime was reported, any crime that occurred on campus, on a non-campus building or property, on public property, or within the patrol jurisdiction of the campus police or the campus security department and is reported to the campus police or the campus security department. The daily crime log must include; 1) the nature, date, time, and general location of each crime; and 2) the disposition of the complaint, if known. The institution must make an entry or an addition to an entry to the log within two business days of the report of the information to the campus police or the campus security department, unless that disclosure is prohibited by law or would jeopardize the confidentiality of the victim. An institution may withhold information if there is clear and convincing evidence that the release of the information would; 1) jeopardize an ongoing criminal investigation or the safety of an individual; 2) cause a suspect to flee or evade detection; or 3) result in the destruction of evidence. The institution must disclose any information withheld once the adverse effect described in that paragraph is no longer likely to occur. An institution may withhold information that would cause the adverse effects described in those paragraphs. The institution must make the crime log for the most recent 60-day period open to public inspection during normal business hours. The institution must make any portion of the log older than 60 days available within two business days of a request for public inspection. 34 C.F.R. § 668.46(f).*

### **Noncompliance:**

*Occidental failed to properly maintain an accurate and complete daily crime log. The review team examined a limited sample of three months of crime log data from September 1, 2012 to December 31, 2012 to test the accuracy of the information posted in the daily crime log. Incidents of crime were cross-referenced to Campus Safety Department incident reports and other source documents including the Watch Supervisor Observation Report. Based on this limited testing, the review team identified 45 incidents that were not entered into the log during the sample period. These include:*

- *Nineteen (19) drug incidents,*
- *Sixteen (16) disturbance responses,*
- *Two (2) vandalisms,*
- *Two (2) burglaries from auto vehicles,*
- *One (1) alcohol violation,*
- *One (1) property damage,*
- *One (1) arson (other),*
- *One (1) Information / child endangerment,*
- *One (1) trespassing, and*
- *One (1) harassment.*

*The Clery Act seeks to ensure that campus community members and other stakeholders have timely access to accurate information about campus crime. The crime log provides up-to-date information that can help campus community members to make informed decisions about their own safety and the security of others. The crime log is to be an up-to-date information source that supplements the statistical disclosures in the ASR. Any failure to comply with this requirement deprives interested parties of vital information to which they are entitled.*

***Required Action:***

*As a result of these violations, Occidental was required to conduct a crime log review/reconstruction for the September 1 - December 31 timeframe for each year of the review period and for calendar years 2013, 2014, and 2015. A summary report of findings was to be prepared that captured all noted exceptions and a copy of this report was required to be submitted as part of the College's official response. If, as a result of this exercise, Occidental identifies any incidents of crime that were not previously captured, the College was to provide detailed information about these offenses in its response and revise its campus crime statistics as needed both in its ASRs and in its reporting to the CSSDACT. Moreover, the crime log entries for calendar year 2015 forward were to be updated as well to reflect the findings of the internal review.*

*Finally, Occidental was required to review and revise its policies, procedures, and internal controls to ensure that all incidents of crime reported as occurring within their patrol jurisdiction were entered on the crime log. These revisions must provide for the designation of a capable official(s) to ensure that the crime log was accurately and completely updated in a timely manner that is readily available to the campus community and public for review upon request. A copy of all revisions must be submitted with Occidental's response to the Program Review Report.*

*Based on an evaluation of all available information, including Occidental's response, the Department will determine appropriate additional actions and advise the College accordingly in the FPRD.*

***Institutional Response:***

*In their official response, Occidental management disagreed in part and concurred in part with this finding. Occidental noted that, in reconstructing its Daily Crime Logs (DCL), it identified and added 36 crimes to the 2012 crime log, 31 crimes to the 2013 crime log, and two crimes to the 2014 crime log. The institution claimed that all 2015 crimes were entered on the log. The Department did not find any disagreements in the institution's response to the violations in this finding.*

### Final Determination:

Finding #5 cited Occidental for multiple violations of the *Clery Act* and the Department's regulations, as outlined in the Noncompliance section above. Specifically, the review team found that the College failed to properly maintain an accurate and complete DCL during the review period. The review team found 79 incidents that were not entered on the log during 2012-2014. As a result of these violations, the College was required to review and revise its internal policies and procedures related to its campus safety and *Clery Act* compliance programs, and to develop and implement any new policies and procedures needed to ensure that these violations do not recur. In its response, Occidental asserted that all necessary action was taken to address the violations identified during the review. The College's response stated that it disagreed in part and concurred in part with this finding, although the Department was unable to identify the basis for any disagreement in the school's response. The College did provide an updated set of policies and procedures regarding the maintenance of the DCLs to ensure that these errors do not occur again.

The Department carefully reviewed all available information, including Occidental's response and supporting documentation. Based on that review and the College's partial admissions, each of the violations noted in the initial finding is sustained. This examination also indicated that the identified violations were, for the most part, satisfactorily addressed by Occidental's reformulated crime log and new and revised internal policies, procedures, and systems as detailed in the response. As such, the Department has decided that the College's corrective action plan meets minimum requirements. For these reasons, the Department has accepted Occidental's response and considers this finding to be closed for the purposes of this Program Review. Nevertheless, College officials and directors must take all other action that may be necessary to address the deficiencies identified by the Department, as well as any additional deficiencies and weaknesses that were detected during the preparation of Occidental's response, and/or as may be needed to otherwise ensure that these violations do not recur.

Occidental is once again reminded that the exceptions identified above constitute serious violations of the *Clery Act* that, by their nature, cannot be cured. There is no way to truly "correct" violations of this type once they occur. Occidental asserted that it has taken adequate remedial actions and that by doing so, that it is now in compliance with the *Clery Act* as required by its PPA. Nevertheless, College officials must understand that the failure to maintain a daily crime log deprives students, employees, parents, the media, and other stakeholders of access to important campus crime information to which they are entitled. Like timely warnings and emergency notifications, the information in the log provides up-to-date current data about the status of criminal incidents on the campus and in the near-campus community. In this way, the crime log and safety alerts supplement the longitudinal statistical data that is included in the ASR and the Department's online campus crime statistics database. For these reasons, the College is advised that its remedial actions cannot and do not diminish the seriousness of these violations nor do they eliminate the possibility that the Department will impose an adverse administrative action and/or require additional corrective actions as a result.



## **Finding #6: Omitted and /or Inadequate ASR Policy Statements**

### **Citation:**

*The Clery Act and the Department's regulations require institutions to include several policy statements in their ASRs. These disclosures are intended to inform the campus community about the institution's security policies and procedures, and the availability of programs and resources as well as channels for victims of crime to seek recourse. In general, these policies include topics such as the law enforcement authority and practices of campus security forces, incident reporting procedures for students and employees, and policies that govern the preparations of the report itself. Institutions are required to disclose their drug and alcohol education and prevention programs. Policies pertaining to sexual assault education, prevention, and adjudication and policies governing the issuance of timely warnings and emergency notifications must also be disclosed in detail. The institution must include the policies and the crime statistics in a single comprehensive document, the ASR. With the exception of certain drug and alcohol program information, cross referencing to other publications is not sufficient to meet the publication and distribution requirements of the Act. §485(f) of the HEA; 34 C.F.R. § 668.46(b); 34 C.F.R. § 668.41(e).*

*Federal regulations specifically require that the ASR include detailed emergency evacuation and response procedures. At a minimum, the procedure must state that the institution will, immediately and without any delay, disseminate emergency notifications (ENs) upon confirmation of a significant emergency or other immediate threat to student and employee health or safety. The policy must state how institutions will go about confirming immediate threats and how ENs will be communicated to students, employees, and the larger community. An institution's procedure must state who may issue an EN, the process for determining the content of the EN, and its approach for determining what segments of the campus community should receive an EN. Institutions must conduct announced and /or unannounced tests of its emergency procedures on at least an annual basis and publicize the nature and results of the test(s). 34 C.F.R. § 668.46(g).*

*Federal regulations require any institution that provides on-campus housing to develop and implement policies and procedures it will follow when a student who resides in those on-campus housing facilities is identified as missing and to include these policies in their ASR. The policies must include statements that indicate the individual or organizations to which students, employees, or other individuals should report that a student has been missing for 24 hours and require that any missing student report be referred to the institution's police or security department or local law enforcement. Students who reside in on-campus housing must be informed of the option to identify a contact person who will be informed in the event that they are missing, that their contact information will be registered confidentially, and for students who are under 18 years of age, a statement that their custodial parent will be notified. The policy must indicate that in all instances law enforcement will be notified. The notification must include a statement that when a student is determined to be missing for 24 hours that their contact person will be notified within 24 hours, if they are under 18 that their custodial parent will be notified*

*and that in all instances, that law enforcement will be notified within 24 hours of the determination that they are missing. 34 C.F.R. § 668.46(h).*

### ***Noncompliance:***

*Occidental failed to include numerous required statements of policy, procedure, practice, and programs in its ASRs during the review period. Moreover, the review team's investigation found that in many cases, the College not only did not include required information in the ASR, but actually failed to develop and implement policy or procedure in several areas. It is likely that these persistent violations predate the review period and may date back to the enactment of the requirement. The nature and extent of these violations represent a general failure to comply with the Clery Act and indicate a serious administrative impairment. Our review of the College's ASRs exposed at least 22 separate policy violations.<sup>11</sup>*

*The extent of Occidental's persistent policy failures suggests a serious administrative impairment. Many of the Department's findings of non-compliance and other systemic weakness in Occidental's campus security operations that were identified throughout the program review can be tracked to exceedingly poor policy development, implementation, and a general lack of communication and training efforts designed to promote knowledge of the limited policies, procedures, and programs that the College did have. The extensive list of violations below supports this assertion and is of great concern to the Department.*

*The Clery Act is first and foremost a consumer information initiative based on the premise that students and employees should have the information they need to take steps for their own safety and security. Accurate and complete disclosure of policies and a clear articulation of the institution's programs are essential to the goal and allow the campus community to be more fully informed and actively provide for their own safety. Any failure in this area deprives the campus community of vital campus safety information and effectively negates the intent of the Act. The following deficiencies were noted:*

### ***2010 ASR - Inadequate/Omitted Disclosures***

- *Failure to include a statement of current campus policies regarding procedures for students and others to report criminal actions or other emergencies occurring on campus. This statement must include the institution's policies concerning its response to these reports, including a list of the titles of each person or organization to which*

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<sup>11</sup> The Department must note that several of the significant policy, procedural, and programmatic statements that were omitted or otherwise found to be inadequate in Occidental's ASRs and AFSRs require a detailed, multi-part disclosure meaning that the College actually failed to include significantly more than 22 disclosures in the reports produced during the review period. The omitted material included information about the College's campus safety, crime prevention, and fire safety programs, including the sexual assault prevention and response information required by Section 304 of the Violence Against Women Reauthorization Act of 2013 (VAWA) and the requirements of 34 C.F.R. § 668.46(b)(11), commonly referred to as the Campus Sexual Assault Victim's Bill of Rights. This information is vitally important to the safety of students and employees at all institutions regardless of a school's size, location, or organizational structure.

*students and employees should report the criminal offenses for the purpose of making timely warning reports and the annual statistical disclosure. 34 C.F.R. § 668.46(b)(2).*

- *Failure to include a statement of policy concerning the monitoring and recording through local police agencies of criminal activity in which students engaged at off-campus locations of student organizations officially recognized by the institution. 34 C.F.R. § 668.46(b)(7).*
- *Failure to include a statement of policy regarding the institution's campus sexual assault programs to prevent sex offenses and procedures to follow when a sex offense occurs. The College's disclosures did not include minimally-acceptable information about the following: 1) a description of educational programs to promote the awareness of rape, acquaintance rape, and other forcible and non-forcible sex offenses; 2) procedures that students should follow when a sex offense occurs, including the importance of preserving evidence; 3) information on the student's option to notify law enforcement authorities and that institutional officials will assist victims or witnesses to navigate the reporting process; 4) information on how to access existing counseling, health, mental health, victim advocacy, legal assistance and other services; 5) specific notification that the institution will change a victim's academic and living situation after an alleged sex offense and the options of those changes, if such changes are requested and are reasonably available; 6) information about the College's procedures for campus disciplinary actions in cases of an alleged sex offense; 7) a statement that both the accuser and the accused must be informed of the outcome of any institutional disciplinary proceeding brought alleging a sexual offense; and, 8) information about possible sanctions that may be imposed following a finding of responsibility for such offenses. 34 C.F.R. § 668.46(b)(11).*
- *Failure to provide a clear statement with accurate information regarding how interested parties can access State sex offender registry data. 34 C.F.R. § 668.46(b)(12).*
- *Failure to include a complete statement in its emergency response and evacuation procedures providing: 1) the procedures the College uses to immediately notify the campus community upon the confirmation of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees occurring on the campus; 2) a description of the process used to confirm that there is a significant emergency or dangerous situation, the appropriate segment or segments of the campus community to receive a notification, the content of the notification; and the initiation of the notification system; 3) a statement that the College will, without delay, and taking into account the safety of the community, determine the content of the notification and initiate the notification system, unless issuing a notification will, in the professional judgment of responsible authorities, compromise efforts to assist a victim or to contain, respond to, or otherwise mitigate the emergency; 4) the list of titles of the person or persons or organization or organizations responsible for carrying out the emergency notification and evacuation actions; and 5) the procedures to test the emergency response and evacuation procedures on at least an annual basis, including*

*that tests may be announced or unannounced, the publication of the emergency response and evacuation procedures in conjunction with at least one test per calendar year, and the documentation for each test, a description of the exercise, the date, time, and whether it was announced or unannounced. 34 C.F.R. § 668.46(g).*

- *Failure to include a statement in its missing student notification procedures advising students that: 1) their contact person's information will be confidentially registered and that the information will only be accessible to authorized campus officials, and that it may not be disclosed, except to law enforcement personnel in the furtherance of a missing student investigation; and 2) the College will notify the custodial parent or guardian of any student that is determined to be missing and who is under 18 years of age unless said person has been emancipated. 34 C.F.R. § 668.46(h).*

### **2011 ASR - Inadequate/Omitted Disclosures**

- *Failure to include a statement of current campus policies regarding procedures for students and others to report criminal actions or other emergencies occurring on campus. This statement must include the institution's policies concerning its response to these reports, including a list of the titles of each person or organization to which students and employees should report the criminal offenses for the purpose of making timely warning reports and the annual statistical disclosure. 34 C.F.R. § 668.46(b)(2).*
- *Failure to include a statement of policy concerning the monitoring and recording through local police agencies of criminal activity in which students engaged at off-campus locations of student organizations officially recognized by the institution. 34 C.F.R. § 668.46(b)(7).*
- *Failure to include a statement of policy regarding the institution's campus sexual assault programs to prevent sex offenses and procedures to follow when a sex offense occurs. The College's disclosures did not include minimally-acceptable information about the following: 1) a description of educational programs to promote the awareness of rape, acquaintance rape, and other forcible and non-forcible sex offenses; 2) procedures that students should follow when a sex offense occurs, including the importance of preserving evidence; 3) information on the student's option to notify law enforcement authorities and that institutional officials will assist victims or witnesses to navigate the reporting process; 4) information on how to access existing counseling, health, mental health, victim advocacy, legal assistance and other services; 5) specific notification that the institution will change a victim's academic and living situation after an alleged sex offense and the options of those changes, if such changes are requested and are reasonably available; 6) information about the College's procedures for campus disciplinary actions in cases of an alleged sex offense; 7) a statement that both accuser and the accused must be informed of the outcome of any institutional disciplinary proceeding brought alleging a sexual offense; and, 8) information about possible sanctions that may be imposed following a finding of responsibility for such offenses. 34 C.F.R. § 668.46(b)(11).*



- Failure to provide a clear statement with accurate information regarding how interested parties can access State sex offender registry data. 34 C.F.R. § 668.46(b)(12).
- Failure to include a complete statement in its emergency response and evacuation procedures providing: 1) the procedures the College uses to immediately notify the campus community upon the confirmation of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees occurring on the campus; 2) a description of the process used to confirm that there is a significant emergency or dangerous situation, the appropriate segment or segments of the campus community to receive a notification, the content of the notification; and the initiation of the notification system; 3) a statement that the College will, without delay, and taking into account the safety of the community, determine the content of the notification and initiate the notification system, unless issuing a notification will, in the professional judgment of responsible authorities, compromise efforts to assist a victim or to contain, respond to, or otherwise mitigate the emergency; 4) the list of titles of the person or persons or organization or organizations responsible for carrying out the emergency notification and evacuation actions; and 5) the procedures to test the emergency response and evacuation procedures on at least an annual basis, including that tests may be announced or unannounced, the publication of the emergency response and evacuation procedures in conjunction with at least one test per calendar year, and the documentation for each test, a description of the exercise, the date, time, and whether it was announced or unannounced. 34 C.F.R. § 668.46(g).
- Failure to include a statement in its missing student notification procedures advising students that: 1) their contact person's information will be confidentially registered and that the information will only be accessible to authorized campus officials, and that it may not be disclosed, except to law enforcement personnel in the furtherance of a missing student investigation; and 2) the College will notify the custodial parent or guardian of any student that is determined to be missing and who is under 18 years of age unless said person has been emancipated. 34 C.F.R. § 668.46(h).

#### **2012 ASR - Inadequate/Omitted Disclosures**

- Failure to include a statement of current campus policies regarding procedures for students and others to report criminal actions or other emergencies occurring on campus. This statement must include the institution's policies concerning its response to these reports, including a list of the titles of each person or organization to which students and employees should report the criminal offenses for the purpose of making timely warning reports and the annual statistical disclosure. 34 C.F.R. § 668.46(b)(2).
- Failure to include a statement of policy concerning the monitoring and recording through local police agencies of criminal activity in which students engaged at off-campus locations of student organizations officially recognized by the institution. 34 C.F.R. § 668.46(b)(7).

- Failure to provide a clear statement with accurate information regarding how interested parties can access a description of drug and alcohol-abuse education programs. 34 C.F.R. § 668.46(b)(10).
- Failure to include a statement of policy regarding the institution's campus sexual assault programs to prevent sex offenses and procedures to follow when a sex offense occurs. The College's disclosures did not include minimally-acceptable information about the following: 1) a description of educational programs to promote the awareness of rape, acquaintance rape, and other forcible and non-forcible sex offenses; 2) procedures that students should follow when a sex offense occurs, including the importance of preserving evidence; 3) information on the student's option to notify law enforcement authorities and that institutional officials will assist victims or witnesses to navigate the reporting process; 4) information on how to access existing counseling, health, mental health, victim advocacy, legal assistance and other services; 5) specific notification that the institution will change a victim's academic and living situation after an alleged sex offense and the options of those changes, if such changes are requested and are reasonably available; 6) information about the College's procedures for campus disciplinary actions in cases of an alleged sex offense; 7) a statement that both accuser and the accused must be informed of the outcome of any institutional disciplinary proceeding brought alleging a sexual offense; and, 8) information about possible sanctions that may be imposed following a finding of responsibility for such offenses. 34 C.F.R. § 668.46(b)(11).
- Failure to provide a clear statement with accurate information regarding how interested parties can access State sex offender registry data. 34 C.F.R. § 668.46(b)(12).
- Failure to include a complete statement in its emergency response and evacuation procedures providing: 1) the procedures the College uses to immediately notify the campus community upon the confirmation of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees occurring on the campus; 2) a description of the process used to confirm that there is a significant emergency or dangerous situation, the appropriate segment or segments of the campus community to receive a notification, the content of the notification; and the initiation of the notification system; 3) a statement that the College will, without delay, and taking into account the safety of the community, determine the content of the notification and initiate the notification system, unless issuing a notification will, in the professional judgment of responsible authorities, compromise efforts to assist a victim or to contain, respond to, or otherwise mitigate the emergency; 4) the list of titles of the person or persons or organization or organizations responsible for carrying out the emergency notification and evacuation actions; and 5) the procedures to test the emergency response and evacuation procedures on at least an annual basis, including that tests may be announced or unannounced, the publication of the emergency response and evacuation procedures in conjunction with at least one test per calendar year, and the documentation for each test, a description of the exercise, the date, time, and whether it was announced or unannounced. 34 C.F.R. § 668.46(g).

- Failure to include a statement in its missing student notification procedures advising students that: 1) their contact person's information will be confidentially registered and that the information will only be accessible to authorized campus officials, and that it may not be disclosed, except to law enforcement personnel in the furtherance of a missing student investigation; and 2) the College will notify the custodial parent or guardian of any student that is determined to be missing and who is under 18 years of age unless said person has been emancipated. 34 C.F.R. § 668.46(h).

#### **2013 ASR - Inadequate/Omitted Disclosures**

- Failure to provide a clear statement with accurate information regarding whether the institution has any policies or procedures that allow victims or witnesses to report crimes on a voluntary, confidential basis for inclusion in the annual disclosure of crime statistics, and, if so, a description of those policies and procedures. 34 C.F.R. § 668.46(b)(2)(iii).
- Failure to provide a clear statement with accurate information regarding how interested parties can access State sex offender registry data. 34 C.F.R. § 668.46(b)(12).

#### **2014 ASR - Inadequate/Omitted Disclosures**

- Failure to include a statement of current campus policies regarding procedures for students and others to report criminal actions or other emergencies occurring on campus. This statement must include the institution's policies concerning its response to these reports, including a list of the titles of each person or organization to which students and employees should report the criminal offenses for the purpose of making timely warning reports and the annual statistical disclosure. 34 C.F.R. § 668.46(b)(2).

The Clery Act is first and foremost a consumer protection and information law based on the precept that students, employees, parents, and other stakeholder are entitled to accurate, complete, and timely information about campus safety and crime prevention matters. This information can empower individuals to make well-informed decisions about events that affect their own well-being and that of other members of the campus community. Any failure by an institution to provide this information or to otherwise carry out its campus safety program in a transparent manner deprives the campus community members of vital information to which they are entitled and effectively negates the intent of the Act.

#### **Required Action:**

As a result of this violation, Occidental was required to review and revise its current policies and procedures that govern the production and distribution of the ASR and AFSR and to then develop and implement additional internal guidance as needed to provide reasonable assurance that all campus safety operations will be carried out in accordance with the Clery Act going forward and that these violations will not recur. Then, using its new and revised policies as a

*guide, Occidental was required to conduct an internal review of its 2015 ASR and AFSR to identify all omitted and inadequate disclosures, with a special focus on the VAWA provisions.*

*Once all deficiencies were identified, the institution was to use this information to produce an accurate and complete 2016 ASR and AFSR. These reports must then be actively distributed to all current students and employees no later than October 1, 2016. No later than October 15, 2016<sup>12</sup>, Occidental must submit copies of the 2016 reports and credible evidence showing that each report was actively distributed to mandatory recipients. Suitable evidence of distribution may include a copy of an e-mail used to transmit the report or other similar documentation. These materials must be submitted via electronic mail to Mr. Douglas Rose at [douglas.rose@ed.gov](mailto:douglas.rose@ed.gov).*

*Based on an evaluation of all available information, including Occidental's response, the Department will determine if additional actions will be required and will advise the College accordingly in its Final Program Review Determination.*

### **Institutional Response:**

In their official response, Occidental management disagreed in part and concurred in part with the finding. Nevertheless, the College claimed that it did review and revise its current policies and procedures that govern the production and distribution of the AFSSR and claimed that new policy, procedural, and programmatic content was developed and included in subsequent AFSSRs.

### **Final Determination:**

Finding #6 cited Occidental for multiple violations of the *Clery Act* and the Department's regulations, as outlined in the Noncompliance section above. Specifically, the review team found that the College failed to include all or part of 22 required statements of policy, procedure, practice, and programs in its AFSSRs for the 2010, 2011, 2012, 2013, and 2014 calendar years. The full list of omitted and inadequate informational disclosures is included in the initial finding above. As a result of these violations, the College was required to review and revise its internal policies and procedures related to its campus safety and *Clery Act* compliance programs, and to develop and implement any new policies and procedures needed to ensure that these violations do not recur. In its response, Occidental asserted that all necessary action was taken to address the violations identified during the review. The College's response focused mainly on its implementation of updated policies and procedures for its production and distribution of its AFSSRs. Although the College disagreed with the Department in part, it fails to directly dispute any of the 22 violations cited.

The Department carefully reviewed all available information, including Occidental's response and supporting documentation. Based on that review and the College's partial admissions, each

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<sup>12</sup> The due date for the submission of the documents requested above is intentionally different than the applicable deadline for the rest of the College's official response to this Program Review Report.



of the violations identified in the initial finding is sustained. This examination also indicated that the identified violations were, for the most part, satisfactorily addressed by Occidental's revised ASRs and new and revised internal policies, procedures, and systems as detailed in the response. As such, the Department has decided that the College's corrective action plan meets minimum requirements. For these reasons, the Department has accepted Occidental's response and considers this finding to be closed for the purposes of this Program Review. Nevertheless, College officials and directors must take all other action that may be necessary to address the deficiencies identified by the Department, as well as any additional deficiencies and weaknesses that were detected during the preparation of Occidental's response, and/or as may be needed to otherwise ensure that these violations do not recur.

Once again, the Department must note that the exceptions identified above constitute persistent and serious violations of the *Clery Act* that, by their nature, cannot be cured. There is no way to truly "correct" violations of this type once they occur. Occidental asserted that it has taken adequate remedial actions and that by doing so, that it is now in compliance with the *Clery Act* as required by its PPA. The production of an accurate and complete ASR is one of the most basic requirements of the *Clery Act* and is an essential part of a comprehensive campus safety and crime prevention program. Accurate and complete safety information enables interested campus community members and their families to make well-informed decisions about where to study and work and empowers them to play a more active role in their own safety and security. Occidental has stated that it has brought its overall campus safety operations program into compliance with the *Clery Act* as required by its PPA. Nevertheless, Occidental is advised that such actions cannot and do not diminish the seriousness of these violations nor do they eliminate the possibility that the Department will impose an adverse administrative action and/or require additional corrective actions as a result.

#### **Finding #7: Discrepant Crime Statistics Reported to CSSDACT and Included in ASRs**

##### ***Citation:***

*The Clery Act and the Department's regulations require institutions to report statistics for the three most recent calendar years concerning the occurrence in on-campus student residential facilities, on campus, in or on non-campus buildings or property, and on public property of the following that are reported to local police agencies or to other campus security authorities: criminal homicide, murder and non-negligent manslaughter, negligent manslaughter, sex offenses, robbery, aggravated assault, burglary, motor vehicle theft, arson, and arrests for liquor law violations, drug law violations, and illegal weapons possession. 34 C.F.R. § 668.46(c)(1). In complying with this requirement, an institution must make a reasonable, good faith effort to obtain the required statistics and may rely on the information supplied by local or state law enforcement agencies. 34 C.F.R. § 668.46(c)(9).*

*Furthermore, federal regulations require institutions to disclose crime statistics by geographical category. The categories of Clery Geography are defined in 34 C.F.R. § 668.46(a) and include:*

- 1) *On Campus I: any building or property owned or controlled by the institution within the same reasonably contiguous geographical area and used by the institution in direct support of, or in a manner related to, the institution's educational purposes, including residence halls;*
- 2) *On Campus II: a subset of On Campus I that includes any building or property that is within or reasonably contiguous to the area defined in #1 above that is controlled by another person or entity, is frequently used by students, and supports institutional purposes (such as a food or other retail vender);*
- 3) *Non-Campus Building or Property: any building or property owned or controlled by a recognized student organization; or any building or property owned and controlled by the institution as described in 1) above and is frequently used by students, but is not within the same reasonably contiguous area; and,*
- 4) *Public Property: all public property that is within the boundaries of the campus or that is immediately adjacent to or accessible from the campus.*

***Noncompliance:***

*Occidental failed to submit campus crime statistics to the Secretary for inclusion in the Campus Safety and Security Data Analysis Cutting Tool that matched the crime statistics that were included in its 2011 and 2013 ASRs. Specifically, in calendar years 2011 and 2012, Occidental submitted crime statistics to the CSSDACT for calendar years 2009, 2010, and 2011 that did not match statistical data that it included in its 2011 and 2012 ASRs for the same offense categories, geographic locations, and calendar years. An institution's crime statistics, as submitted online to CSSDACT and as included in the ASR should always match. Furthermore, institutions must be able to substantiate the accuracy and completeness of their crime statistics with credible evidence and supporting documentation. For this purpose, Occidental submitted to the Department its audit trails that were used to compile and tally all of its Clery crimes that were reported to the campus police, local law enforcement agencies, and other CSAs. Audit trails identify the incident report number, dates the offense category, geographic location and calendar year for each Clery-reportable crime that is submitted to the CSSDACT and included in ASRs.*

*The Department reviewed the College's audit trails, crime statistics in the ASRs, and the data submitted to the CSSDACT. As a result, the Department found Occidental's audit trails did not demonstrate the accuracy and completeness of its crime statistics that were submitted to the CSSDACT and included in ASRs, since the audit trails omitted incident report numbers, dates, and geographic locations for where crimes occurred.*

*Through its outside counsel (O'Melveny & Myers, LLC), Occidental provided the Department a letter dated May 2, 2014, Page 4, which states:*

*Prior to 2013, Occidental reported all crimes that occurred in the Campus Safety Escort Zone that surrounds the campus as public property crimes. This interpretation of public*

*property is broader than the adjacent public property (sidewalk-street-sidewalk) definition for the purposes of the Clery Act. Occidental reviewed and revised its public property numbers in 2013 to comply with the correct definition of public property.*

*However, this does not negate the consumer information that was provided to students, employees, parents, and potential employees and students, who reviewed the ASR and CSSDACT. Furthermore, Occidental's misinterpretation of Clery geography does not cure the institution of its obligation to provide concise and accurate crime statistics. The review team found a minimum of 49 incidents from calendar years 2009 to 2012 that were not included in Occidental's crime statistics for incidents that occurred on public property. The following discrepancies, identified with an asterisk (\*), are recognized as improperly reported crime statistics occurring on public property.*

*Occidental claimed that certain incidents of crime that appeared to be part of its Clery-reportable public property actually were outside of its Clery Geography. The College is reminded to clarify any issues regarding its campus crime statistics with an appropriate note or caveat in the ASR and in its reporting to the CSSDACT to avoid errors or inaccurate interpretations by users of the information. No such notes or caveats were included during the review period. Information on the proper use of caveats was included in The Handbook for Campus Safety and Security Reporting (2011), Chapter 9*

*The following discrepancies were identified as a result of a comparison of the crime statistics that were included in the ASR and in the data submitted to the CSSDACT. A selected group of those discrepancies and others are described in the paragraphs below.*

#### **1. Forcible Sex Offenses On-Campus and in On-Campus Student Residential Facilities, Calendar Year 2009**

*Occidental's online submission to CSSDACT during reportable year 2011 revealed that four (4) forcible sex offenses took place on campus property and in on-campus student residential facilities during calendar year 2009; however, its 2011 ASR indicated that (0) offenses occurred during this time period.*

<i>Forcible Sex Offenses for Calendar Year 2009</i>		
<i>Source</i>	<i>2011 CSSDACT</i>	<i>2011 ASR</i>
<i>On-Campus</i>	<i>4</i>	<i>0</i>
<i>On-Campus Student Residential</i>	<i>4</i>	<i>0</i>

*Occidental's forcible sex offense statistics continued to evidence serious discrepancies. The College's 2012 submission to the CSSDACT indicated that four (4) incidents occurred on campus and in on-campus student residential facilities; however, the 2012 ASR indicated that zero (0) offenses occurred on campus and in on-campus student residential facilities during this time period.*

<i>Forcible Sex Offenses for Calendar Year 2009</i>		
<i>Source</i>	<i>2012 CSSDACT</i>	<i>2012 ASR</i>
<i>On-Campus</i>	4	0
<i>On-Campus Student Residential</i>	4	0

## **2. Non-Forcible Sex Offenses On-Campus and in On-Campus Student Residential Facilities, Calendar Year 2009**

Crime statistics that were submitted to CSSDACT during reportable year 2011 for non-forcible sex offenses did not match statistical data that was included in the 2011 ASR for the same offense category and geographic locations in calendar year 2009. Specifically, Occidental reported to the CSSDACT that zero (0) non-forcible sex offenses occurred on campus in calendar year 2009; however, the 2011 ASR indicated that four (4) such incidents were reported during the same time period.

The crime statistics that were included in ASRs under “on-campus student residential facilities” were not replicated as a subset under the “on-campus property” geographic location. The 2011 ASR showed zero (0) as the statistic for non-forcible sex offenses under the on-campus property geographic location for calendar year 2009; but, four (4) non-forcible sex offenses were reported in the ASR under the on-campus student residential facilities geographic location for that same calendar year.

According to a May 2, 2014 letter, these four (4) incidents were “mistakenly categorized”. Furthermore, the letter stated the “CSSDACT was mistakenly left blank in the non-campus category and should have reflect zero incidents” exhibiting the inaccurate information presented to the consumer.

<i>Non-Forcible Sex Offenses for Calendar Year 2009</i>		
<i>Source</i>	<i>2011 CSSDACT</i>	<i>2011 ASR</i>
<i>On-Campus</i>	0	0
<i>On-Campus Student Residential</i>	0	4

## **3. All Criminal Offenses on Non-Campus Property, Calendar Year 2009**

Occidental did not properly apply the Clery Geography definitions to its buildings and properties during the review period. Specific errors of this type were identified during an analysis of the statistical information that was included in the 2011 and 2012 ASRs. The College disclosed certain crimes as occurring on “off-campus property” as opposed to the correct category of “non-campus buildings and property.” Similarly, “on-campus property” was referred to improperly as “general campus” in the statistical grids and in the caveat sections of crime statistics tables.

Furthermore, Occidental’s ASR indicated that “zero” incidents of crime were reported in each sub-category during the calendar year; however, the College’s response to the Campus Safety and Security Data Analysis Cutting Tool was left blank. The Department’s survey instructions specifically state, “Do not leave any cells blank even if you have no crimes to disclose for a



particular category. Zero (0) is a statistic; enter a zero whenever there are no reported crimes to disclose in a particular table cell."<sup>13</sup>

#### **4. Robberies on Public Property, Calendar Year 2009\***

Occidental failed to properly report robberies that occurred on public property. Although eight (8) robberies were disclosed in the ASR and reported to the CSSDACT; the audit trail provided to the review team did not substantiate the accuracy of this disclosure.

#### **5. Burglaries on Public Property, Calendar Year 2009\***

Occidental included reports in its ASRs and online to CSSDACT that two (2) burglaries occurred on public property; however, the actual number of burglaries is zero (0) for this time period.

<i>Burglaries for Calendar Year 2009</i>			
<i>Source</i>	<i>2010 CSSDACT</i>	<i>2010 ASR</i>	<i>Actual</i>
<i>Public Property</i>	0	2	0

#### **6. Motor Vehicle Thefts on Public Property, Calendar Year 2009\***

Occidental failed to properly disclose the number of motor vehicle thefts that occurred on public property. In this case, fourteen (14) offenses were reported to the CSSDACT; however, eighteen offenses were disclosed in the ASR. The correct number of offenses is eighteen (18).

<i>Motor Vehicle Thefts for Calendar Year 2009</i>			
<i>Source</i>	<i>2010 CSSDACT</i>	<i>2010 ASR</i>	<i>Actual</i>
<i>Public Property</i>	14	18	18

#### **7. Robberies on Public Property, Calendar Year 2010\***

Occidental failed to properly disclose the number of robberies that occurred on public property. In this case, six (6) incidents were disclosed in the ASR and reported to the CSSDACT; however, five (5) of these offenses occurred beyond the parameters for the College's Clery Geography, per the Watch Commander's Log. It was noted that most of these incidents did occur within the College's patrol jurisdiction and therefore, were required to be entered on the daily crime log.

<i>Robberies for Calendar Year 2010</i>			
<i>Source</i>	<i>2011 CSSDACT</i>	<i>2011 ASR</i>	<i>Actual</i>
<i>Public Property</i>	6	6	1

#### **8. Aggravated Assaults on Public Property, Calendar Year 2010\***

Occidental failed to properly report the number of aggravated assaults that occurred on public property. Three (3) offenses were disclosed in the ASR and reported to the CSSDACT; however,

<sup>13</sup> The Handbook for Campus Safety and Security Reporting (2011), Chapter 9.

all three (3) incidents occurred beyond the parameters of Clery Geography but within the College's patrol jurisdiction.

Aggravated Assaults for Calendar Year 2010			
Source	2011 CSSDACT	2011 ASR	Actual
Public Property	3	3	0

#### 9. Burglaries on Public Property, Calendar Year 2010\*

Occidental failed to properly report the number of burglaries that occurred on public property. Nineteen (19) incidents were disclosed in the ASR while zero (0) incidents were reported to the CSSDACT for the same time period. The actual number of burglaries is zero (0).

Burglaries for Calendar Year 2010			
Source	2011 CSSDACT	2011 ASR	Actual
Public Property	0	19	0

#### 10. Motor Vehicle Thefts on Public Property, Calendar Year 2010\*

Occidental failed to properly report the number of motor vehicle thefts that occurred on public property. Occidental recorded eight (8) offenses; however, seven (7) of these incidents occurred beyond the parameters of the College's Clery Geography.

Motor Vehicle Thefts for Calendar Year 2010			
Source	2011 CSSDACT	2011 ASR	Actual
Public Property	8	1	1

#### 11. Arson on On-Campus Student Housing Facility, Calendar Year 2010

Occidental failed to properly report the number of arsons that occurred in on-campus student housing units. One (1) offense was disclosed in the 2011; however, zero (0) arsons were reported to the CSSDACT. The actual number of incidents was one (1).

Arson for Calendar Year 2010			
Source	2011 CSSDACT	2011 ASR	Actual
On-Campus Student Housing Facility	0	1	1

#### 12. Hate Crime on Public Property, Calendar Year 2010\*

Occidental failed to properly report the number of hate crimes that occurred on public property. In this case, Occidental disclosed one (1) offense in the ASR and reported the same incident to the CSSDACT; however, this incident actually occurred beyond the parameters of the College's Clery Geography.

Hate Crime for Calendar Year 2010			
Source	2011 CSSDACT	2011 ASR	Actual
Public Property	1	1	0

### 13. Robberies on Public Property, Calendar Year 2011\*

Occidental failed to properly report the number of robberies on public property. In this case, Occidental disclosed one (1) offense in the ASR and also reported it to the CSSDACT; however, this incident actually occurred beyond the parameters of the College's Clery Geography but within the patrol jurisdiction.

Robberies for Calendar Year 2011			
Source	2012 CSSDACT	2012 ASR	Actual
Public Property	1	0	0

### 14. Burglaries on Public Property, Calendar Year 2011\*

Occidental's ASR indicated that four (4) burglaries occurred on public property but reported zero (0) offenses to the CSSDACT for the same time period. The actual number of burglaries was zero (0).

Burglaries for Calendar Year 2010			
Source	2011 CSSDACT	2011 ASR	Actual
Public Property	0	4	0

### 15. Motor Vehicle Thefts on Public Property, Calendar Year 2011\*

Occidental failed to properly report the number of motor vehicle thefts that occurred on public property. During this time period, there were ten (10) reported motor vehicle thefts in the College's patrol jurisdiction, but only two (2) occurred on the College's public property.

Motor Vehicle Thefts for Calendar Year 2010			
Source	2011 CSSDACT	2011 ASR	Actual
Public Property	10	10	2

This finding is supported by the crime statistics that Occidental included in its ASRs as well as the information submitted to the CSSDACT for calendar years 2011 and 2012.

Any failure to report accurate and complete crime statistics to the CSSDACT and to fully reconcile the crime statistics included in the ASR with the data submitted to the Secretary deprives campus community members and other stakeholders of access to accurate campus safety information to which they are entitled. Discrepant information may cause confusion for users of the ASR and the CSSDACT and distorts information that is intended to allow interested parties to play a more active role in their own safety and security.

**Required Action:**

*As a result of this violation, Occidental was required to take all necessary corrective actions to rectify this violation and all others identified in this Program Review Report. In addition, the College was to review/reconstruct the crime statistics disclosed during the review period and for calendar years 2013, 2014, and 2015. If as a result of this exercise, Occidental identifies additional incidents of crime that were not previously included in its campus crime statistics then steps must be taken to revise those statistics (ASR and CSSDACT), as required. A summary report was to be prepared that captures all changes, and this report must be submitted as part of the College's official response. The response to this finding may be incorporated into the detailed file examination that is required under Finding #2 at the discretion of management. The Department's review and Occidental's admissions strongly indicate that there was a serious flaw in the crime statistics that were included in ASRs and that were submitted to the CSSDACT over several years. As such, additional work is needed to determine the extent of the problem as the first step in developing a meaningful corrective action plan that will provide reasonable assurances that such violations will not recur.*

*As part of this process, the College was required to review and enhance its policies, procedures, internal controls, systems, and training programs to ensure that all statistical disclosures that are included in the ASR and AFSR and that are submitted to the CSSDACT are accurate, complete, and fully reconciled. The College also required to review and revise its existing policies and procedures and develop and implement new internal guidance, as needed, to ensure compliance with these requirements going forward and to further ensure adequate custody, control, and data integrity of all Clery-related records and supporting documentation in accordance with the Department's record retention requirements at 34 C.F.R. § 668.24(f). A copy of all new and revised policies and procedures must accompany Occidental's response to this Program Review Report.*

**Institutional Response:**

In their official response, Occidental management disagreed in part and concurred in part with this finding. In light of its submission of several erroneous numbers to the CSSDACT as compared to its AFSSRs, the College has indicated that it has implemented several safeguards to ensure that crime statistics are accurately and completely compiled for future reports. For example, the College points out that it has: identified all CSAs on campus and provided training to them; reviewed all Report Exec and Maxient incident reports; and conferred with residential services, student conduct services, and Title IX officers on a regular basis to discuss processes for reporting incident reports. Additionally, the College indicated that it has also taken steps to ensure that it retains all relevant information and records for the 7 years following the Department's Program Review.

**Final Determination:**

Finding #7 cited Occidental for multiple violations of the *Clery Act* and the Department's regulations, as outlined in the Noncompliance section above. Specifically, the review team



found that the College failed to submit campus crime statistics to the Secretary for inclusion in the CSSDACT that matched the crime statistics that were included in its 2011 to 2013 AFSSRs, meaning that one or both data sets were inaccurate. Please see the chart above for more information on the specific statistical discrepancies identified by the review team. As a result of these violations, the College was required to conduct an internal review of its crime statistics and the source documents upon which they were based. Then, based on that data collection and analysis, Occidental officials were required to correct the statistical data that was submitted to the CSSDACT and that was included in its ASRs. Finally, the College was required to review and revise its existing policies and procedures and develop and implement new internal guidance, as needed, to provide reasonable assurance that these violations will not recur. Although it noted partial disagreement, the College does not refute that it provided incorrect data concerning the 15 examples in the Noncompliance Section of the Program Review Report. The College admitted that it erroneously submitted the wrong data. Many times, the College stated that its over reporting of its numbers was due to a failure to adhere to the *Clery* geography rules for the 2011 through 2013 review period. The College has since corrected the erroneously reported figures, and has placed safeguard mechanisms in place to avoid this type of inaccurate reporting in the future.

The College also examined its AFSSRs and the information submitted to CSSDACT for the period of 2012 through 2015, and made corrections as needed. In one incident, the Department disagreed with the College's analysis of a 2013 Arson as reported in its response in Appendix A, example 25. Occidental believed that this case should not have been reported as Arson since the LAFD did not report back to them on an annual report request that this particular incident was Arson. However, in a report issued by LAFD on October 21, 2014 Incident 0013 indicates that the cause of ignition was "intentional"; thus, this incident should have been reported as an Arson. The College will need to adjust its reports to reflect the correct classification of this crime and update the crime statistics accordingly.

The Department carefully examined all available information, including Occidental's narrative response and supporting documentation. Based on that review and the College's partial admissions, the Department has determined that each of the violations identified in the noncompliance section of the initial finding are sustained. The examination indicated that the identified violations were, for the most part, satisfactorily addressed by Occidental's responsive documents and new and revised policies and procedures. As such, the Department has decided that the College's corrective action plan meets minimum requirements. For these reasons, the Department has accepted Occidental's response and considers this finding to be closed for the purposes of this Program Review. Nevertheless, College officials and directors must take all other action that may be necessary to address the deficiencies identified by the Department, as well as any additional deficiencies and weaknesses that were detected during the preparation of Occidental's response, and/or as may be needed to otherwise ensure that these violations do not recur.

Occidental is reminded that the exceptions identified above constitute serious and persistent violations of the *Clery Act* that, by their nature, cannot be cured. There is no way to truly "correct" a violation of this type once it occurs. Timely submission of accurate crime statistics

to the Department is among the most basic requirements of the *Clery Act* and is fundamental to its campus safety goals. Access to this information permits campus community members and their families to make well-informed decisions about where to study and work and empowers individuals to play a more active role in their own safety and security. The College asserted that it has taken adequate remedial actions, and that, by doing so, it is now in compliance with the *Clery Act* as required by its PPA. Nevertheless, Occidental is advised that its remedial actions cannot and do not diminish the seriousness of these violations, nor do they eliminate the possibility that the Department will impose an adverse administrative action and/or require additional corrective actions as a result.

**Finding #8: Failure to Establish an Adequate System for Collecting Crime Report Information from All Required Sources - Campus Security Authorities**

**Citation:**

*The Clery Act and the Department's regulations require institutions to compile and include accurate and complete statistics concerning the occurrence of the following incidents: homicide, manslaughter, forcible and non-forcible sex offenses, robbery, aggravated assaults, burglary, motor vehicle theft, and arson. Statistical disclosure of arrests and disciplinary actions related to violations of Federal, State or local drug, liquor and weapons laws are also required. 34 C.F.R. § 668.46(c)(1)(B). To comply with these requirements, institutions must develop a system that allows for the collection of incidents of crime reported to any campus security authority. 34 C.F.R. § 668.46(c)(2). Federal regulations define a campus security authority in four distinct groups of individuals and organizations associated with an institution: 1) a campus police or a campus security department of an institution; 2) any individual or individuals who have responsibility for campus security but who do not constitute a campus police department or a campus security department; 3) any individual or organization specified in an institution's statement of campus security policy as an individual or organization to which students and employees should report criminal offenses; and 4) an official of an institution who has significant responsibility for student and campus activities, including but not limited to athletics, student housing, student discipline and campus judicial proceedings. 34 C.F.R. § 668.46(a).*

*The ASR also must include a list of the title of each official or organization to which students or employees should report criminal offenses for the purpose of issuing timely warnings and compilation of the annual statistical disclosure. This statement must disclose whether the institution has any policies or procedures that allow victims or witnesses to report crimes on a voluntary, confidential basis for inclusion in the annual disclosure of crime statistics, and if so, a description of those policies and procedures. 34 C.F.R. § 668.46(b)(2)(iii).*

**Noncompliance:**

*Occidental failed to gather statistics for incidents of Clery-reportable crimes from nearly all of the College's campus security authorities (CSAs) for the years 2009, 2010, and 2011. Copies of the College's records indicate that the College only requested information from two (2) CSAs*

*during this time period. As a result of this very serious systemic failure, the College failed to produce an accurate and complete ASR as required by the Clery Act over this three-year period.*

*Two days prior to the commencement of the Department's site visit, the College sent out a memo to 120 CSAs requesting them to report any crimes that they were aware of for the year 2012. The memo apologized for the requested short turnaround (due back by September 24, 2013) since they needed to have this information prior to producing the 2013 ASR, which was due to be distributed a few days later on October 1, 2013. In fact, the use of CSAs were only referred to in the 2010, 2011, and the 2012 ASRs as places where the College would collect statistics. Nothing in these ASRs mentioned that a student, faculty, or staff member could report a crime to a CSA or actually included a comprehensive list of CSAs to whom one could report a crime until the 2013 ASR. In addition, the review team learned from several Occidental officials that there was no training provided to CSAs prior to June 2013. The first CSAs that received any training were a group of five senior administrators who attended training on the Clery Act in San Francisco three months prior to the Department's program review.*

*While it is not clear that Occidental engaged in this pattern of conduct purposely, the apparent lack of effort to identify and train CSAs across the College was a major contributor in the serious compliance failure identified during the program review. It is now clear that the College's CSAs were not aware of their reporting obligations and this caused an unquantifiable number of offenses in the official statistics. Moreover, such failures result in survivors not being provided with the services and protective measures to which they are entitled. The review team also found that the coordination and communication between the campus security officials charged with preparing the ASR and nearly all CSAs was wholly deficient and that the data collection processes were not reasonably constructed to permit the College to compile and include accurate and correct crime statistics.*

*Occidental also failed to provide a listing of titles of each person or organization (CSAs) to which students and employees should report criminal offenses in their 2014 ASR. Pages 10-11 of this ASR refer to CSAs, but provide no distinctive list of CSAs. This 2014 ASR refers to Occidental's Title IX definition for "responsible employees" who have the responsibility for accepting the report of sexual offenses; however, concerning all other crimes, the ASR fails to clearly delineate the CSAs by title or organization.*

*Failure to request and disclose statistics for incidents of crime reported to CSAs and to include this information in an accurate and complete ASR deprives students and employees of important campus safety information to which they are entitled. This vital information empowers interested campus community members to be better informed and to play a more active role in their own safety. This information also serves as an important resource for the media, researchers, policymakers, and other stakeholders.*

***Required Action:***

*As a result of these violations, Occidental was required to develop detailed policies and procedures and implement adequate internal controls to ensure that officials charged with*

*compiling crime reports from CSAs and local law enforcement agencies carried out these duties in a manner that will result in the compilation and disclosure of accurate and complete crime statistics and otherwise provide reasonable assurances that these violations will not recur. The College was to also design and deployed an effective crime statistics data request and collection mechanism for CSAs to use. Such procedures must provide for the proper classification of incidents, in accordance with the definitions in Appendix A to Subpart D of the General Provisions Regulations, and ensure that accurate and complete statistics for these offenses are included in the ASR and submitted to the CSSDACT. In addition, Occidental was required to take steps to ensure that CSAs were properly identified and received appropriate training concerning their reporting obligations and was given a simplified method to report incidents to the designated officials. Finally, Occidental was required to provide a good-faith estimate of the number of CSAs that it believed to have been in place during the 2009, 2011, 2013, and 2015 calendar years. A current list of actual CSAs by department and job title was required in the College's response. This information will be used to estimate the effect of this violation.*

*Based on an evaluation of all available information, including Occidental's response, the Department will determine whether additional actions are needed and advise the College accordingly in its Final Program Review Determination.*

#### **Institutional Response:**

In their official response, Occidental management disagreed in part and concurred in part with this finding. Under the required actions, the College did provide its new procedures for training and collecting information from its CSAs. The College estimated that, during calendar years 2009, 2011, 2013 and 2015, it had approximately 200 CSAs. Additionally, as requested, the College provided a current list of its 206 CSAs, along with their respective titles. The College further noted that it has entered into a Memorandum of Understanding (MOU) with the LAPD effective February 24, 2016.

#### **Final Determination:**

Finding #8 cited Occidental for multiple violations of the *Clery Act* and the Department's regulations, as outlined in the Noncompliance section above. Specifically, the review team found that the College failed to collect statistics for incidents of *Clery*-reportable crimes from nearly all of the College's CSAs for calendar years 2009, 2010, and 2011. As a result of these violations, Occidental was required to take extensive action in an attempt to ascertain the negative effects on the accuracy and completeness of the College's crime statistics that resulted from the ongoing failure to collect information about incidents of crimes that were reported to CSAs throughout the review period. In its response, the College disagreed in part and concurred in part with this finding. However, in doing so, the College does not refute that it failed to collect statistics from its CSAs for the CYs 2009, 2010, and 2011. As noted in the noncompliance section, the College first requested this information from its CSAs while the Department was on-site conducting its Program Review.



The Department carefully examined all available information, including Occidental's narrative response and supporting documentation. Based on that review and the College's partial admissions, the Department has determined that each of the violations identified in the initial finding is sustained. The examination indicated that the identified violations were, for the most part, satisfactorily addressed by Occidental's updated policies and procedures, although the effects of this violation can never be fully known or in any meaningful regard, remedied. Moreover, as was the case with the entire response, the College stated that it disagreed with some aspects of the finding but failed to identify any factual or legal flaws in the Department's presentation. While the response claims that errors were identified and that necessary revisions were made, there is no indication that Occidental attempted to determine the reasons for its persistent failure to identify CSAs, to notify them of the reporting obligations conferred upon them by Federal law, and to provide them a simplified mechanism to provide crime information to a central source for compilation and as importantly, for appropriate follow-up.

While the response indicated that the College has continued to have some 200 CSAs throughout the review period it is now clear that crime statistics were not collected from most of these officials during those years. Furthermore, prior to the Department's intervention, the ASRs that the College produced during the review period did not clearly explain the role of CSAs or identify a list of CSAs to whom students and employees could report incidents or any substantive information about what would be done with that information. This condition was partially remedied for the first time in the 2013 AFSSR. The fact that the full extent of this violation cannot be quantified at this point is part of what makes it so serious. What is known is that a violation of this type always causes the extent of criminal activity on a campus to be underrepresented in the ASR and in the reporting to the CSSDACT and also compounds the effect of other violations, such as the failure to issue timely warnings or to maintain an accurate and complete crime log.

Moreover, this violation is an indication of the types of serious administrative impairments that were set out in Finding #1. The CSA requirements, both with regard to practice and policy, at 34 C.F.R. § 668.46(b)(iii) recognize the ways that many campus community members actually reports incidents of crime. While Occidental acknowledged these requirements, much of the response to this finding minimized its seriousness and did not indicate that the College understands the importance of an adequate CSA process plays in overall *Clery Act* compliance. An institution's opportunity to file a substantive official response to findings of violation is an integral part of the Program Review process and is the primary means by which an institution shows that it understands the cause of a deficiency and that officials have the ability and resources to prevent recurrence. As importantly, the response phase ensures that the institution's right to be heard is protected and preserved and allows an institution to submit evidence to challenge a finding of violation and/or to raise facts in mitigation. In these regards, the College's response causes serious concerns because rather than filing a clear answer to the findings that shows that the violation will not recur, the College chose to stay defensive and alternatively minimized the exceptions or framed remedial measures as efforts taken to appease the Department. The point that must not be lost is that the failures documented throughout this FPRD caused information to be disseminated to campus community members and other stakeholders that was false and that served to make the campus and the near-campus community

appear safer than it was. Notwithstanding these concerns, the review team's examination of the response and supporting information indicates that the College has started to address most of its most serious compliance problems regarding CSAs. As such, the Department has determined that the College's corrective action plan meets minimum requirements and for these reasons, has accepted Occidental's response and considers this finding to be closed for the purposes of this Program Review. Nevertheless, the officials and directors of Occidental are put on notice that they must take all other action that may be necessary to address the deficiencies identified by the Department, as well as any additional deficiencies and weaknesses that were detected during the preparation of Occidental's response, and/or as may be needed to otherwise ensure that these violations do not recur.

The Department must point out again that Occidental's failures noted above constitute serious and persistent violations of the *Clery Act* that, by their nature, cannot be cured. There is no way to truly "correct" a violation of this type once it occurs. The requirements to identify CSAs and to make them fully aware of the obligations conferred upon them by the law are essential precursors to compliance with the law. From there, an institution must actively seek out information about incidents of crime that were reported to CSAs. Any failure to carry out these steps will cause the disclosure of inaccurate and incomplete crime statistics in direct opposition to the law's purpose. Access to this complete and fully-reconciled crime information permits campus community members and their families to make well-informed decisions about where to study and work and empowers individuals to play a more active role in their own safety and security. The College asserted that it has taken adequate remedial actions, and that, by doing so, it is now in compliance with the *Clery Act* as required by its PPA. Nevertheless, Occidental is advised that its remedial actions cannot and do not diminish the seriousness of these violations, nor do they eliminate the possibility that the Department will impose an adverse administrative action and/or require additional corrective actions as a result.

#### **Finding # 9: Drug and Alcohol Abuse Prevention Program Requirements Not Met - Multiple Violations**

##### ***Citation:***

*The DFSCA and the Department's Part 86 Regulations require each institution of higher education (IHE) to certify that it has developed and implemented a drug and alcohol abuse prevention program (DAAPP). The program must be designed to prevent the unlawful possession, use, and distribution of drugs and alcohol on campus and at recognized events and activities.*

*On an annual basis, each IHE must provide the following information in writing to all current students (enrolled for any type of academic credit except for continuing education units) and all current employees:*

- *A written statement about its standards of conduct that prohibits the unlawful possession, use or distribution of illicit drugs and alcohol by students and employees;*

- *A written description of legal sanctions imposed under Federal, State, and local laws and ordinances for unlawful possession or distribution of illicit drugs and alcohol;*
- *A description of the health risks associated with the use of illicit drugs and alcohol abuse;*
- *A description of any drug or alcohol counseling, treatment, and rehabilitation/re-entry programs that are available to students and employees; and,*
- *A statement that the IHE will impose disciplinary sanctions on students and employees for violations of the institution's codes of conduct and a description of such sanctions.*

*The distribution plan must make provisions for providing the DAAPP disclosure annually to students who enroll at a date after the initial distribution and for employees who are hired at different points throughout the year.*

*In addition, each IHE must conduct a biennial review to determine the effectiveness of its DAAPP and to ensure consistent enforcement of applicable drug and alcohol-related statutes, ordinances, and institutional policies against students and employees found to be in violation. The biennial review materials must be maintained by the IHE and made available to the Department upon request. 34 C.F.R. §§ 86.3 and 86.100.*

#### ***Noncompliance:***

*Occidental violated multiple requirements of the DFSCA. Specifically, the review team found that the College failed to develop and implement a comprehensive DAAPP and as a result, also did not produce an accurate and complete annual disclosure that summarizes the program. The College chose to include certain drug and alcohol information in the Student Handbook and the Employee Handbook. The information in the handbooks did not address the following required program elements:*

- 1. No description of any health risks associated with the use of illicit drug and alcohol abuse;*
- 2. No description of any drug or alcohol counseling, treatment, and rehabilitation/re-entry programs that are available to students and employees; and,*
- 3. No statement that the College will impose disciplinary sanctions on students and employees for violations of the institution's codes of conduct and a description of such sanctions.*

*Occidental also violated the annual DAAPP disclosure distribution requirement by failing to actively deliver program information to all employees and students who are enrolled for any academic credit annually. The review team found that the College merely sent an e-mail message to students and employees that asked them to read the Handbook and to acknowledge that they have done so. The message also requests that campus community members comply with the policies and procedures set forth therein. This passive approach to distributing DAAPP*

information is not adequate to meet the active distribution standard set out in Federal law and the Department's regulations. An institution may distribute the annual disclosure by electronic mail if it wishes to do so. The method for such a distribution would require the institution to post program materials on its website and then send an e-mail message to each mandatory recipient that includes a direct link to the document. Sending a general email message to students and employees encouraging them to read all of the College's policies does not meet the standard for direct notice.

Finally, Occidental failed to conduct substantive biennial reviews to actually assess the effectiveness of its DAAPP and the consistency of sanctions imposed for violations of its codes of conduct. While the review team takes notice that Occidental did produce biennial review reports in 2009 and 2013, neither report evidences any attempt to actually measure the effectiveness of the College's neither DAAPP nor the consistency of sanctions imposed for violations. For this reason, the review team found that the rudimentary reports that were produced did not meet minimum standards. Moreover, the Department must point out that the College failed to conduct a biennial review in 2011.

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 conduct substantive biennial reviews deprives the institution itself of important information about the effectiveness of any drug and alcohol programming that may have been in place during the review period. Data compiled by the Department shows that such failures may contribute to increased substance abuse as well as an increase in drug and alcohol-related violent crime.

#### **Required Action:**

Occidental was required to take all necessary corrective actions to resolve these violations. At a minimum, these actions must include:

- Developing and implementing a comprehensive DAAPP that included all of the required elements found in the DFSCA and the Department's Part 86 regulations and producing a materially-complete disclosure that summarized the program;
- Developing procedures for ensuring that the DAAPP program disclosure is distributed to all employees and all students enrolled for academic credit on an annual basis. Occidental must provide a draft copy of its DAAPP disclosure and new distribution policy with its response to this Program Review Report. Once the materials are approved by the Department, the College must distribute them in accordance with the Part 86 regulations and its new policy and provide documentation evidencing the distribution, as well as a statement of certification attesting to the fact that the materials were distributed as required. This certification must also affirm that the College understands all of its DFSCA obligations and that it has taken all necessary corrective actions to ensure that these violations do not recur;



- *Submitting a copy of the 2015 biennial review report. If the College has not already conducted a review, immediately conduct a substantive biennial review to assess the effectiveness of its DAAPP. Occidental must describe the research methods and data analysis tools that will be 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 College's President and/or its board. The biennial review must be completed by December 1, 2016 and the report must be completed and submitted to the review team no later than December 15, 2016; and,*
- *Establishing policies and procedures that ensure that all subsequent biennial reviews are conducted in a timely manner and are fully documented. The College also must take all other necessary action to ensure that these violations do not recur.*

*Based on an evaluation of all available information including Occidental's response, the Department will determine if additional actions will be required and will advise the College accordingly in the FPRD.*

#### **Institutional Response:**

In their official response, Occidental management disagreed in part and concurred in part with this finding. The College asserts that it has implemented a comprehensive DAAPP and that program materials have been disseminated separately to students and employees since 2010.

Regarding this distribution, the College stated that, since 2012, it has sent out its Alcohol and Other Drugs (AOD) policy to students, via an Enrollment Clearance process that includes an electronic version of the policy. From 2010 to 2012, the College used a distribution policy of providing a link, in its electronic Enrollment Clearance process, to the AOD policy for students to read. Prior to 2010, the school indicated that it distributed a hardcopy of the student handbook, which included the AOD policy and requested that students electronically acknowledge their receipt and reading of the policy.

In support of its claims, the College submitted a copy of its 2015 Biennial Review Report and a copy of its new and revised policies and procedures.

#### **Final Determination:**

Finding #9 cited Occidental for multiple violations of the *DFSCA* and the Department's Part 86 Regulations, as outlined in the Noncompliance section above. Specifically, the review team found that the College did not develop and implement a comprehensive DAAPP that addressed all required subject areas during the entire review period. As noted in the finding, the program materials provided to the review team did not address health risks associated with substance abuse, options for counseling and treatment on campus and in the near-campus community, or the required statement that the College will impose disciplinary sanctions for violations of its codes of conduct. In addition, Occidental failed to actively distribute accurate and complete Part 86 program materials prior to 2012. Moreover, the review team found that the College did not

conduct adequate biennial reviews in CYs 2009, 2011, and 2013. No review of any kind was conducted in 2011.

These separate and distinct violations necessarily follow from each other because the biennial review is primarily a study of the DAAPP's effectiveness. Therefore, an institution cannot conduct a proper biennial review until it has a fully-functional DAAPP in place and program requirements and standards of conduct are communicated clearly to all members of the campus community. As a result of these violations, Occidental was required to review and revise any existing DAAPP materials and develop new program content, as needed. The College was also required to produce and distribute an accurate and complete annual DAAPP disclosure and to actively distribute it to all campus community members in accordance with Federal requirements and the institution's new internal procedures. In addition, Occidental was required to conduct a substantive biennial review and produce an initial report of findings, recommendations, and supporting documentation. Finally, College officials were directed to submit copies of all new and revised program materials, policies, and procedures along evidence that Part 86 program materials were distributed in the required manner, and a certification statement attesting to its remedial efforts. In its response, College officials concurred in part with the finding, described their remedial actions, and submitted documents in support of their claims.

While the College stated its disagreement with parts of the finding, it did not dispute its failure to include information about health risks, counseling and treatment options, and enforcement of its codes of conduct in the DAAPP for CYs 2009, 2010, 2011, 2012, and 2013. The College did not address the fact that it also failed to include information regarding these same three subject areas in the DAAPP materials intended for employees from 2009 through the end of the review period. Finally, the College did not address its failure to conduct and document substantive biennial reviews prior to April, 2014. In fact, on Page 3 of the school's 2015 Biennial Review Report, the Occidental DOA committee reported the following: "During the fall of 2009 the committee compiled their first review of the College's AOD prevention program. However, there was not a thorough biennial review completed until April of 2014." This determination tracked the Department's rationale and is based on the repeated failure to assess the effectiveness of the substance abuse prevention program and the consistency of sanctions imposed for violations of its codes of conduct from 2009 through at least 2013.

The Department carefully examined all available information, including Occidental's narrative response and supporting documentation. Based on this review and the College's partial admissions, each of the violations noted in the initial finding are sustained, as the evidence indicates that Occidental never fully complied with the *DFSCA* prior to and for a period after the Department's intervention. Nevertheless, the review team's examination indicated some improvement in these areas and that the majority of the violations were, for the most part, satisfactorily addressed by the College's new and revised Part 86 program materials, 2015 biennial review report, and new and revised internal policies and procedures. However, one element of the required actions set out in the Program Review Report was not adequately addressed. As of the date of this FPRD, the College has not provided a copy of an acceptable DAAPP disclosure or evidence of active distribution in accordance with Federal law and the College's new distribution procedure. The College must remedy this condition within 30 days of

its receipt of this FPRD.<sup>14</sup> These program materials must specifically address the legal sanctions that may be imposed for violations of Federal, state, and local drug and alcohol laws and the health risks associated with drug and alcohol abuse. Moreover, the officials and directors of Occidental must take all necessary action to address the deficiencies and weaknesses identified by the Department as well as those that were detected during the preparation of the response to the Department's report and as may otherwise be needed to ensure that these violations do not recur.

In this regard, Occidental is advised that it must continue to develop its DAAPP. The College must also ensure that it distributes accurate and complete DAAPP materials to all students and employees on an annual basis in accordance with the Department's regulations and the College's procedures. Moreover, Occidental must conduct substantive biennial reviews and do so on the required schedule. Occidental officials must take care to ensure that each review is in fact a probative inquiry into the program's effectiveness. The review process must not merely become a conclusory ratification of existing policy. Finally, the College must produce detailed reports that clearly state the methods used and outcomes reached during each review. Each report must also be approved by Occidental's chief executive and/or its Board.

Occidental is reminded that the exceptions identified above constitute serious and persistent violations of the *DFSCA* that by their nature cannot be cured. There is no way to truly "correct" violations of this type once they occur. The College asserted that it has taken adequate remedial actions and is now in compliance with the *DFSCA* as required by its PPA. Nevertheless, Occidental officials must understand that the Department deems compliance with the *DFSCA* is essential to maintaining a safe and healthy learning environment. This is true for all institutions regardless of their size, location, or organizational structure. Data compiled by the Department shows that the use of illicit drugs and alcohol abuse is highly correlated to increased incidents of violent crime on campus, increased absenteeism, and a failure to successfully complete a program of study. The compliance failures identified above deprived the College and its officials of important information about the effectiveness of any drug and alcohol programs that were in place during the Department's review period. Such failures may contribute to increased drug and alcohol abuse on-campus as well as an increase in drug and alcohol-related violent crime and constitute a violation of Federal law. For these reasons, the Occidental is reminded that corrective measures cannot and do not diminish the seriousness of these violations nor do they eliminate the possibility that the Department will impose an adverse administrative action and/or require additional corrective measures as a result.

Finally, the Department strongly recommends that Occidental re-examine its drug and alcohol abuse prevention policies, procedures, and programs on at least an annual basis and revise them as needed to ensure that they continue to reflect current College policies and are in full compliance with the *DFSCA*. Please be advised that the Department may request information on a periodic basis to test the effectiveness of the College's new policies and procedures.

## **Additional Inquiry: Separate Campuses**

### **Citation:**

*The Clery Act and the Department's regulations require that all institutions that receive Title IV, HEA funds must, by October 1 of each year, produce and distribute to its current students and employees through appropriate publications and mailing, a comprehensive Annual Security Report and Annual Fire Safety Report (if the institution has an on-campus student residential facility) that contain, at a minimum, all of the statistical and policy, procedural, and programmatic elements enumerated in 34 C.F.R. §§ 668.46 and 668.49, respectively.*

*These regulations further require that all campuses must independently meet all Clery Act campus safety and fire safety-related requirements for each separate campus. A location is considered to be a separate campus if it meets the following criteria:*

- *The institution owns or controls the site;*
- *It is not reasonably contiguous with the main campus;*
- *It has an organized program of study; and,*
- *There is at least one person on site acting in an administrative capacity.*

### **Required Action:**

*In response to this Departmental inquiry, Occidental was required to take immediate and intentional action to research the extent to which the College operates one or more separate campuses other than the main campus under the criteria set out above.*

*Specifically, Occidental's response must address with specificity the status of the William and Elizabeth Kahane United Nations Program in New York City, Occidental's Biology Department Program in Costa Rica, and Occidental's research vessels in the Los Angeles area as to whether one or more of these locations constitutes a separate campus for Clery Act purposes. All claims made and positions taken in the response to this inquiry must be substantiated by credible supporting documentation. The response to this inquiry must accompany the interim response required under Finding #6 and must be submitted to Mr. Rose via electronic mail. If it is determined that one or more of these locations is a separate campus, Occidental will be required to produce a 2016 ASR and AFSR (if the campus has student housing). At its discretion, the College may produce a single ASR and AFSR that includes all required information for all campuses or it may prepare campus-specific reports. Regardless of the campus status of these locations, Occidental must report on its efforts to provide an adequate campus safety and crime prevention program at these locations and describe its efforts to comply with the Clery Act.*

*Based on a review of all available information, including Occidental's response, the Department will determine if additional actions will be required and will advise the College accordingly in subsequent correspondence and in its Final Program Review Determination.*



### **Institution's Response to Additional Inquiry Concerning Separate Campuses:**

On October 14, 2016, the College provided a response to our inquiry about the above-referenced programs and locations. Additional information about the proper treatment of these programs and locations for *Clery Act* purposes will be provided separately.

### **Conclusion**

As noted throughout this report, Occidental violated numerous provisions of the *Clery Act's* campus safety standards, the HEA's fire safety rules, and the substance abuse prevention requirements of the *DFSCA*. The Department considers compliance in these areas to be fundamental to the health and safety goals of the HEA, the *Clery Act*, and the *DFSCA*. Access to accurate, complete, and transparent disclosures of safety information helps students, employees, and other stakeholders to make well-informed decisions about where to study, work, and live. The transparency created by these disclosures also empowers campus community members to play a more active role in their own safety and security. Occidental asserted that it has taken adequate remedial actions and that by doing so, is now in compliance with the HEA, the *Clery Act* and the *DFSCA*, as required by its PPA. Nevertheless, Occidental officials must understand that the violations documented here deprived students, employees, parents, the media, and other interested parties of access to important campus safety, crime prevention, and fire safety information to which they are entitled. For these reasons, the College is once again advised that its remedial actions cannot and do not diminish the seriousness of these violations nor do they eliminate the possibility that the Department may require additional corrective actions as a result.

The Department's objective in conducting this and all Campus Crime Program Reviews is to improve the safety of America's college campuses. The development and implementation of a substantive corrective action plan is the first step to moving Occidental toward full compliance with the HEA, the *Clery Act*, and the *DFSCA* as soon as possible.

The Department strongly recommends that Occidental re-examine its campus safety and general Title IV policies and procedures on an annual basis to ensure that they continue to reflect current institutional practices and are compliant with Federal regulations. As part of these periodic reviews, Occidental officials may wish to review the Department's "Handbook for Campus Safety and Security Reporting" (2016) for guidance on complying with the *Clery Act*. The handbook is available online at: [www2.ed.gov/admins/lead/safety/handbook.pdf](http://www2.ed.gov/admins/lead/safety/handbook.pdf). The Department also provides a number of other *Clery Act* training resources. Occidental officials can access these materials at: [www2.ed.gov/admins/lead/safety/campus.html](http://www2.ed.gov/admins/lead/safety/campus.html). The regulations governing the *Clery Act* can be found at 34 C.F.R. §§ 668.14, 668.41, 668.46, and 668.49.

Finally, in light of the violations documented during this review, Occidental management is advised to take immediate action to ensure that the College is in compliance with Section 304 of the Violence Against Women Reauthorization Act of 2013 (VAWA). VAWA amended the *Clery Act* to require institutions to compile and disclose statistics for incidents of sexual assault, dating violence, domestic violence, and stalking. VAWA also requires institutions to include new policy, procedural, and programmatic disclosures regarding sexual assault prevention and

response in its ASRs. All institutions were already obligated to comply with the statutory requirements of VAWA and must include the new required amendments in the 2014 ASR. Because the Department issued Final Rules on the VAWA amendments on October 20, 2014, the new regulations went into effect on July 1, 2015, per the Department's Master Calendar. Occidental officials may access the text of the Final Rule at:  
<http://ifap.ed.gov/fregisters/attachments/FR102014FinalRuleViolenceAgainstWomenAct.pdf>.

## **Appendix C:**

### **Recommended changes to Annual Security Report for Compliance**



Requirement	Current ASR	Suggestion
<p>1. Standards of conduct that clearly prohibit, at a minimum, the unlawful possession, use or distribution of illicit drugs and alcohol by students and employees on its property or as part of any of its activities</p>	<p>Section: Policy regarding the possession, use, and sale of alcoholic beverages</p> <p>Section: Policy regarding the possession, use, and sale of illegal drugs</p>	
<p>2. A description of the applicable legal sanctions under local, State, or Federal law for the unlawful possession or distribution of illicit drugs and alcohol</p>	<p>“Students are responsible for abiding by the Student Code of Conduct and local, state, and federal laws whether on or off campus. Failure to do so can result in criminal, civil, and University proceedings and sanctions. Students and student organizations that are in violation of the law are also violating the Student Code of Conduct and can be held accountable under both separate systems. Violations of the University’s Drug Policy as well as other regulations contained in the Carolina Community will be referred to appropriate University offices.”</p>	<p>Example 1 from Occidental College: California laws regarding the use of alcoholic beverages are highlighted below and are accurate as of May 2017. The laws are abbreviated for general use and may not cover all situations. It is the responsibility of the server or consumer of alcoholic beverages to be aware of, and abide by, all federal, state and local laws and ordinances. Examples of common offenses and penalties include: (10 laws and common sanctions)</p> <p>The Federal Controlled Substances Act provides penalties of up to 15 years imprisonment and fines up to \$25,000 for unlawful distribution or possession with intent to distribute illegal drugs. For the unlawful possession of illegal drugs, a person is subject to up to one year of imprisonment and fines up to \$5,000. Any person who unlawfully distributes an illegal drug to a person under twenty-one years of age may be punished by up to twice the term of imprisonment and fined otherwise authorized by law.</p> <p>The unlawful use, possession, distribution, manufacturing, or dispensing of illegal drugs</p>

		<p>is prohibited by Occidental College. Criminal Sanctions under California Law for the unlawful possession or distribution of illegal drugs and alcohol include the following: (6 laws &amp; common sanctions)</p> <p>Example 2: Illinois Higher Education Center suggested template:</p> <p>List of Common State Laws and Sanctions</p>
3. A description of the health risks associated with the use of illicit drugs and the abuse of alcohol		<p>Example 1 from Occidental College:</p> <p>V. Associated Health Risks and Campus Resources</p> <p>The risks associated with the use of illegal drugs, pharmaceuticals and other substances and the abuse of alcohol are numerous and include physical and mental impairment, emotional and psychological deterioration, and potentially devastating effects on family and friends. There are obvious risks, such as suffering a hangover, being charged with driving under the influence or while intoxicated, and sustaining or causing personal injury. There are a number of less obvious risks associated with alcohol and other drug abuse that students might not realize, including:</p> <ul style="list-style-type: none"> <li>• Poor academic and/or job performance</li> </ul>

		<ul style="list-style-type: none"><li>• Initiating nonconsensual sexual activity, which could lead to expulsion and criminal liability</li><li>• Being subjected to nonconsensual sexual activity, which could lead to psychological and physical trauma including sexually transmitted infections</li><li>• Jeopardizing future career prospects (e.g., admission to law school or government employment)</li></ul> <p>In addition, alcohol and other drug abuse puts the user at considerable health risk, which can include, nausea, vomiting, cancer, liver damage, elevated blood pressure, psychotic episodes, hallucinations and, in some cases, death. In addition to the risk to the abuser of illicit drugs and alcohol are the risks to other students and the entire Occidental College community. A chart on the uses and effects of controlled substances can be viewed <a href="#">here</a>. The chart is taken from the United States Department of Justice, Drug Enforcement Administration, Drugs of Abuse (1997 edition).</p> <p>Example 2: Illinois Higher Education Center suggested template: Chart of Common Health Effects from Alcohol &amp; Drugs</p>
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<p>4. A description of any drug or alcohol counseling, treatment or rehabilitation or re-entry programs that are available to employees or students</p>	<p>“An alcohol and drug education and counseling program is also provided. Additional information is available by calling (803) 777-5781.”</p> <p>“SAPE maintains relationships with and listings of alcohol and drug support groups and resources in the Columbia and Midlands area of South Carolina. “</p>	
<p>5. A clear statement that the institution will impose disciplinary sanctions on students and employees (consistent with State and Federal law), and a description of those sanctions, up to and including expulsion or termination of employment and referral for prosecution, for violations of the standards of conduct; a disciplinary sanction may include the completion of an appropriate rehabilitation program.</p>	<p>“The Division of Law Enforcement and Safety (DLES) works closely with the Office of Student Conduct (OSC) and SAPE to educate the student population concerning the responsible use of alcohol. Although every situation is different, officers typically refer student violators of the state’s alcohol laws to OSC for counseling and student discipline. Violations of the state’s underage drinking laws may be enforced through filing appropriate criminal charges and are usually handled by OSC with a referral from law enforcement. Violations of drug laws are usually handled through the local criminal justice system. The vast majority of first time offenders are usually allowed to enter a diversionary program, referred to as Pre-Trial Intervention, which is coordinated by the local solicitor’s office. Student violators of drug laws are also referred to OSC.”</p>	

**Appendix D:**

**Alcohol & Drug Survey Inventory**

## Copy of Alcohol Data Inventory

Department	Student Health Services	Student Health Services	Fraternity & Sorority Life	Substance Abuse Prevention & Education	Substance Abuse Prevention & Education	Substance Abuse Prevention & Education	USC Police	USC Police	USC Police	USC Police	USC Police	USC Police	Student Conduct	Student Conduct
<b>What data point is collected?</b>	alcohol use- quantity and frequency, consequences, protective behaviors, and many of health data points which can be cross-referenced with alcohol use.	AUDIT, perception of risk, perception of peers; can be cross referenced with a rich set of mental health measures.	1. Alcohol use, days per week w/ 5+ weeks (Dyad). 2. Alcohol and substance abuse behaviors (consumption and # of times a week) (Skyfactor)	alcohol use - quantity, frequency, consequences, risk reduction strategies, locations, motivations for use, interest in change, age at first use. Also other drug use, demographics, and up to 10 custom questions (fake ID use and bystander intervention related to alcohol overdose asked in Fall 2017)	alcohol use - frequency, quantity, consequences, risk reduction strategies, transportation, mixing with other drugs, typical location, location of last drink, fake ID use and source, bystander intervention with alcohol overdose. Unique identifier links to AUDIT and PHQ9 scores.	night of hospitalization: drinking locations, risky behaviors, types of alcohol consumed, motivations, bystander intervention related to alcohol overdose. Open ended: what made this night different and advice to others. Process feedback.	Assistance Rendered Calls for service by EMS related to Alcohol use	USC PD discipline referrals for alcohol, drugs discipline - name, date, narrative, location (also used for CLERY stats)	Tickets / Citations given to individuals to go to court for Alcohol, drugs and all other criminal violations (also used for CLERY stats) - Related to this is ARREST DATA / If we take someone to jail. A citation is written everytime someone goes to jail	Incident reports related to alcohol use	All vehicle collision data around the University (including alcohol related subset)	Ejection data from USC football games. Includes alcohol subset	Students transported to	Any data point requested with rationale for usefulness with advanced notice
<b>In what survey or assessment is it included?</b>	National College Health Assessment	Healthy Minds Study	Dyad in 2017 & Skyfactor in 2016	Alcohol Edu	STIR	Hospitalization Survey	NA	NA	NA	NA	NA	NA	Maxient	Maxient
<b>What population is being surveyed or evaluated?</b>	randomized sample of graduate and undergraduates from Columbia campus	randomized sample of graduate and undergraduates from Columbia campus	All fraternity & sorority members	new USC-Columbia undergraduate students under age 23 (first year and transfer)	students referred to STIR program by the Office of Student Conduct for their second alcohol violation, first marijuana violation, or hospitalization due to intoxication (92% in Fall 2017) or referred by parent, student organization, attorney, or themselves (8% in Fall 2017). Data can be easily filtered by any of these groups.	students referred to the STIR program for a hospitalization due to intoxication. Hospitalized students not referred to STIR are sent the survey at the end of each semester with a lower response rate.	On campus individuals in which someone called DLES for EMS assistance	Students that USC PD comes in contact with that we refer to conduct for discipline	Anyone we come into contact with - general public	Anyone we come into contact with - general public	Vehicle collisions around the University	People ejected from football games	Any student USC is aware of that is transported	All students reported to student conduct
<b>What is the population size?</b>	9000 graduate and undergraduate students	8000 graduate and undergraduate students	6,500 undergraduate students	5800 fall, 1500 spring, undergraduate new students	approximately 250 (219 students in 2016-17, 304 as of 3/7/18)	254 in 2016-2017, 72 as of 3/7/2018	1,655 calls since 2014	About 1,020 since 01/01/13 (alcohol, drugs and conduct)	About 2,500 a year (all citations much fewer for alcohol related)	Hard to say - between 200-300 per year just alcohol	10-20 Alcohol related collisions around the university every year	Depending on the game alcohol related ejections can range up to 60 or 70	Between 150-300 per year	3,000-4,000 annually
<b>How are the data collected?</b>	On-line survey	On-line survey	On-line survey	online survey embedded in Alcohol Edu course	online surveys completed during STIR program	online survey completed at the end of the STIR program	Collected by USC PD dispatcher	Collected by USC Police Officers	Collected by USC Police Officers	Collected by USC Police Officers	Collected by the state (DPS) sent to USC PD monthly. Collected from various LE agencies responding to traffic collisions	By police / USC ejection post personnel	Maxient through housing and police reports	reports from housing, PD or community members
<b>When are the data collected?</b>	February of odd years	October/November of 2016 and upcoming 2018	Oct/Nov 2017	Survey 1: within 30 days of the first day of classes. Survey 3: approximately six weeks later/end of October	During first and third STIR appointments (approximately 6 weeks apart)	At the end of the STIR program, typically 8 weeks after their hospitalization	Always	Always	Always	Always	Sent to USC PD monthly	During football games	The 1st of the month	Daily
<b>How frequently are the data collected?</b>	Every other year	Every other year or every third year	Every other year	Every fall and spring semester	throughout the fall and spring semesters	throughout the fall and spring semesters	Always	Always	Always	Always	Monthly	every football game	Daily, run each month	Daily
<b>When is data collection or analysis complete?</b>	Early summer odd years	Spring following administration	End of the fall semester	Preliminary data available after each deadline. Highlights prepared by EverFi typically available in March. Additional analysis could be completed by campus staff or EverFi.	Preliminary data available at the end of each semester. Final analysis completed in May for the year with focus on program effectiveness. Additional analysis could be completed.	Preliminary data available at the end of each semester. Final analysis completed in May. Additional analysis could be completed.	Data collection is never complete and analysis is completed upon request. Usually monthly	Data collection is never complete and analysis is completed upon request. Usually monthly	Data collection is never complete and analysis is completed upon request. Usually monthly	Data collection is never complete and analysis is completed upon request. Usually monthly	Usually data is collected and processed around the 15th of each month	Usually within 48 hrs of end of football game	End of the year	Preliminary data available at the end of each semester. Final analysis completed in May. Additional analysis could be completed.

## Copy of Alcohol Data Inventory

<b>What standard times do you suggest "freezing" these data for external reporting?</b>				March - with report from EverFi	December for Fall semester. May for entire year.	December for Fall semester. May for entire year.	We can change time frames as requested - We often report on Calendar year because of some federal reporting requirements but can create as needed	We can change time frames as requested - We often report on Calendar year because of some federal reporting requirements but can create as needed	We can change time frames as requested - We often report on Calendar year because of some federal reporting requirements but can create as needed	We can change time frames as requested - We often report on Calendar year because of some federal reporting requirements but can create as needed	Probably annual	Football season Aug- Dec		December for Fall semester. May for entire year.
<b>When did the office start tracking this data?</b>	2006	2016	2017 (Dyad) & Skyfactor (2006)	2011	2015	2017	2012	2012	2012	2012	2015 but could go farther back if needed	Football season 2013	monthly	
<b>Contact Person</b>	Rebecca Caldwell or Asst. Dir. Research & Evaluation	Rebecca Caldwell or Asst. Dir. Research & Evaluation	Jarod Holt	Aimee Hourigan	Aimee Hourigan	Aimee Hourigan	David Dannels	David Dannels	David Dannels	David Dannels	David Dannels	David Dannels		2010
<b>Additional Information</b>				EverFi analysis includes fall first year students only.	Survey also asks about cannabis use (type, frequency, motivations, and consequences), prescription drug use/misuse, reason for referral, demographics, program feedback.								Maureen Grewe	Maureen Grewe
<b>Strengths of data set</b>	Consistent use of nationally validated tool	Highly respected national study; suggested by JED Campus and CCMH (Center for Collegiate Mental Health)	Dyad is a newer assessment tool that primary looks at other factors such as hazing tolerance and organizational experience	shows changes in behavior over first semester, benchmarking available for SEC, national, peer and aspirant institutions, response rate is high - typically 80% by deadline, 95% by December	High risk student population, some questions are not asked anywhere else (location of last drink)	Unique student population, high response rate	Easy to get to and has location data - Don't have to rely on EMS for the stats	Easy to get to. Has good data and is fairly reliable	Data has to be accurate because it is a charging document for court. For good or bad there can be "multiple" entries for single incident if someone is charged for multiple criminal violations	(also data is available online - Community Crime Map) Has lots of good descriptive info - location, time, etc and has a good bit of data quality control	Gives a good idea about alcohol related collisions around the university	Gives a good general idea about alcohol activity at a football game		
<b>Limitations of data set</b>	response rate (good for online, but is self selection)	Study questions shift a bit each year; study hasn't been public with national comparison data.		first year and transfer students only	small sample of high risk students, some questions have changed over time so year-to-year comparison is not always available	small sample of students, new survey so comparisons not available	I think it would be better to get this data from EMS - not much data quality control on this, Dispatchers enter this the best they can	Over the years we have changed our practice regarding when we do referrals so we don't have an established baseline for this reason hard to compare to previous years	It is hard to distinguish student vs nonstudent population - rely on officers judgement / asking	It is hard to distinguish student vs nonstudent population (rely on officers asking). Good bit of cross over / not mutually exclusive from other data collection.	Not our data - no person data, unable to determine student vs non student. Data can be inaccurate, not much quality control	Data quality is so so because of the crazy chaotic nature of a football game - limited data about circumstances and person info	Allows us to intervene with at risk students	Lots of ways to pull data
													Doesn't capture every st	Can be pulled many ways and needs clear explanation of date ranges and analysis



**Appendix E:**

**National College Health Assessment 2017**

**Executive Summary**

# **University of South Carolina**

## **Executive Summary**

Spring 2017

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American College Health Association  
National College Health Assessment II



ACHA-NCHA II

The ACHA-NCHA II supports the health of the campus community by fulfilling the academic mission, supporting short- and long-term healthy behaviors, and gaining a current profile of health trends within the campus community.

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ACHA, the nation's principal advocate and leadership organization for college and university health, represents a diverse membership that provides and supports the delivery of health care and prevention and wellness services for the nation's 20 million college students. For more information about the association's programs and services, visit [www.acha.org](http://www.acha.org), and [www.acha-ncha.org](http://www.acha-ncha.org).

*Suggested citation for this document:*

American College Health Association. American College Health Association-National College Health Assessment II: University of South Carolina Executive Summary Spring 2017. Hanover, MD: American College Health Association; 2017.

## Introduction

The ACHA-National College Health Assessment II (ACHA-NCHA II) is a national research survey organized by the American College Health Association (ACHA) to assist college health service providers, health educators, counselors, and administrators in collecting data about their students' habits, behaviors, and perceptions on the most prevalent health topics.

ACHA initiated the original ACHA-NCHA in 2000 and the instrument was used nationwide through the spring 2008 data collection period. The ACHA-NCHA now provides the largest known comprehensive data set on the health of college students, providing the college health and higher education fields with a vast spectrum of information on student health. A revised survey, the ACHA-NCHA-II, has been in use since the fall 2008 data collection period.

Please note the ACHA-NCHA II is not appropriate for trend comparison with items from the original ACHA-NCHA survey. Directly comparing pre- and post-redesign estimates on similar data points, without taking into account the impact of the survey's redesign, can lead to an erroneous conclusion.

### ***Notes about this report:***

1. Missing values have been excluded from analysis and only valid percents are included in this document.
2. Students responding "not applicable" were excluded from several analyses, which are specifically noted throughout this document. This will often explain differences observed between this document and the full data report.
3. ***A note about the use of sex and gender in this report:*** Survey responses are reported by sex based on the responses to questions 47a, 47b, and 47c. For the purpose of the ACHA-NCHA report documents, respondents are reported as male or female only when their responses to these three questions are consistent with one another. If students' gender identity is consistent with their sex at birth AND the student selects "no" for transgender, then respondents are designated as either *male* or *female*. If respondents select "yes" for transgender OR their sex at birth is not consistent with their gender identity, then they are designated as *non-binary*. A respondent that skips any of the three questions is designated as *unknown*. Totals displayed in this report include *non-binary* and *unknown* students.

For additional information about the survey's development, design, and methodology, email Mary T Hoban, PhD, MCHES, (mhoban@acha.org), E. Victor Leino, PhD (vleino@acha.org), or visit [www.acha-ncha.org](http://www.acha-ncha.org).

This Executive Summary highlights results of the ACHA-NCHA II Spring 2017 survey for University of South Carolina consisting of 1,462 respondents.

The overall response proportion was 16.3%.

## Findings

### A. General Health of College Students

■ 55.5 % of college students surveyed ( 59.6 % male and 54.3 % female) described their health as **very good or excellent**.

■ 88.3 % of college students surveyed ( 89.1 % male and 88.2 % female) described their health as **good, very good or excellent**.

Proportion of college students who reported being diagnosed or treated by a professional for any of the following health problems within the last 12 months:

Allergies:	23.1 %	Hepatitis B or C:	0.3 %
Asthma:	8.2 %	High blood pressure:	3.5 %
Back pain:	10.1 %	High cholesterol:	2.8 %
Broken bone/Fracture/Sprain:	6.5 %	HIV infection:	0.1 %
Bronchitis:	10.3 %	Irritable Bowel Syndrome:	3.2 %
Chlamydia:	2.0 %	Migraine headache:	10.7 %
Diabetes:	1.2 %	Mononucleosis:	2.5 %
Ear infection:	10.3 %	Pelvic Inflammatory Disease:	0.1 %
Endometriosis:	1.0 %	Repetitive stress injury:	1.7 %
Genital herpes:	0.7 %	Sinus infection:	28.7 %
Genital warts/HPV:	0.7 %	Strep throat:	15.0 %
Gonorrhea:	0.1 %	Tuberculosis:	0.5 %
		Urinary tract infection:	12.2 %

■ 62.4 % of college students ( 49.0 % male, 68.1 % female) reported being diagnosed or treated by a professional with one or more of the above conditions within the last 12 months.

Proportion of college students who reported any of the following:

Attention Deficit and Hyperactivity Disorder (ADHD)	11.6 %
Chronic illness (e.g., cancer, diabetes, auto-immune disorders)	7.5 %
Deafness/Hearing loss	1.7 %
Learning disability	3.6 %
Mobility/Dexterity disability	1.3 %
Partial sightedness/Blindness	1.6 %
Psychiatric condition	10.2 %
Speech or language disorder	0.8 %
Other disability	2.2 %

## B. Disease and Injury Prevention

College students reported receiving the following vaccinations (shots):

- 68.1 % reported receiving vaccination against hepatitis B.
- 55.3 % reported receiving vaccination against Human Papillomavirus/HPV (cervical cancer vaccine).
- 45.0 % reported receiving vaccination against influenza (flu) in the last 12 months (shot or nasal mist).
- 75.5 % reported receiving vaccination against measles, mumps, rubella.
- 68.9 % reported receiving vaccination against meningococcal meningitis.
- 63.1 % reported receiving vaccination against varicella (chicken pox).

Other disease prevention practices reported by college students:

- 76.3 % reported having a dental exam and cleaning in the last 12 months.
- 37.6 % of males reported performing a testicular self exam in the last 30 days.
- 39.8 % of females reported performing a breast self exam in the last 30 days.
- 54.4 % of females reported having a routine gynecological exam in the last 12 months.
- 58.0 % reported using sunscreen regularly with sun exposure.
- 26.8 % reported ever being tested for Human Immunodeficiency Virus (HIV) infection.

College students reported the following behaviors within the last 12 months:

<b>Percent (%)</b>	N/A, did not do this activity within the last 12 months		Never*	Rarely or sometimes*	Mostly or always*
Wear a seatbelt when you rode in a car	0.2		0.3	1.8	97.9
Wear a helmet when you rode a bicycle	57.8		38.2	28.3	33.5
Wear a helmet when you rode a motorcycle	85.6		13.9	16.3	69.9
Wear a helmet when you were inline skating	86.3		56.3	18.1	25.6

\* Students responding "N/A, did not do this activity within the last 12 months" were excluded.



### C. Academic Impacts

Within the last 12 months, students reported the following factors affecting their individual academic performance, defined as: received a lower grade on an exam, or an important project; received a lower grade in the course; received an incomplete or dropped the course; or experienced a significant disruption in thesis, dissertation, research, or practicum work; (listed alphabetically):

Alcohol use:	4.0 %	Gambling:	0.1 %
Allergies:	2.1 %	Homesickness:	3.2 %
Anxiety:	22.4 %	Injury:	2.2 %
Assault (physical):	0.7 %	Internet use/computer games:	9.1 %
Assault (sexual):	1.5 %	Learning disability:	2.9 %
Attention Deficit/Hyperactivity Disorder:	7.8 %	Participation in extracurricular	
Cold/Flu/Sore throat:	14.9 %	activities:	8.2 %
Concern for a troubled friend		Pregnancy (yours or partner's):	0.4 %
or family member:	8.1 %	Relationship difficulties:	7.4 %
Chronic health problem or serious illness:	4.3 %	Roommate difficulties:	5.1 %
Chronic pain:	2.3 %	Sexually transmitted disease/	
Death of a friend or family member:	4.9 %	infection (STD/I):	0.5 %
Depression:	13.7 %	Sinus infection/Ear infection/	
Discrimination:	1.2 %	Bronchitis/Strep throat:	7.0 %
Drug use:	1.2 %	Sleep difficulties:	16.9 %
Eating disorder/problem:	1.2 %	Stress:	27.1 %
Finances:	5.1 %	Work:	11.0 %
		Other:	2.1 %

### D. Violence, Abusive Relationships and Personal Safety

Within the last 12 months, college students reported experiencing:

	Percent (%)	Male	Female	Total
A physical fight		9.6	2.0	4.3
A physical assault (not sexual assault)		4.4	2.0	2.7
A verbal threat		25.7	13.8	17.4
Sexual touching without their consent		3.4	11.4	9.2
Sexual penetration attempt without their consent		0.7	5.4	4.2
Sexual penetration without their consent		0.5	3.6	2.7
Stalking		0.7	4.6	3.6
An emotionally abusive intimate relationship		4.7	10.8	8.9
A physically abusive intimate relationship		1.2	1.6	1.5
A sexually abusive intimate relationship		0.5	1.3	1.1

*Findings continued*

College students reported feeling *very safe* :

	<i>Percent (%)</i>	<b>Male</b>	<b>Female</b>	<b>Total</b>
On their campus (daytime)		89.4	87.5	87.9
On their campus (nighttime)		42.0	16.5	24.0
In the community surrounding their school (daytime)		52.0	46.1	47.8
In the community surrounding their school (nighttime)		16.5	7.0	9.9

## E. Tobacco, Alcohol and Marijuana Use

Reported use versus perceived use - reported use for all students within the past 30 days compared with how often students perceived the typical student on campus used substances within the same time period. The last line of each table combines all categories of any use in the last 30 days.

### Cigarette

	<i>Percent (%)</i>	<b>Actual Use</b>			<b>Perceived Use</b>		
		<b>Male</b>	<b>Female</b>	<b>Total</b>	<b>Male</b>	<b>Female</b>	<b>Total</b>
Never used		68.1	79.5	76.0	12.3	8.7	10.0
Used, but not in the last 30 days		17.7	13.2	14.7	14.8	10.9	12.0
Used 1-9 days		11.3	4.9	6.7	49.0	50.7	49.9
Used 10-29 days		1.0	1.0	1.0	14.8	20.2	18.4
Used all 30 days		2.0	1.5	1.6	9.1	9.5	9.6
<i>Any use within the last 30 days</i>		14.3	7.4	9.3	72.9	80.4	78.0

### E-Cigarette

	<i>Percent (%)</i>	<b>Actual Use</b>			<b>Perceived Use</b>		
		<b>Male</b>	<b>Female</b>	<b>Total</b>	<b>Male</b>	<b>Female</b>	<b>Total</b>
Never used		80.0	87.8	85.5	17.8	13.8	15.0
Used, but not in the last 30 days		13.3	10.0	10.9	16.5	10.6	12.3
Used 1-9 days		3.4	1.6	2.1	44.2	50.4	48.3
Used 10-29 days		1.7	0.4	0.8	13.1	17.4	16.0
Used all 30 days		1.5	0.3	0.7	8.4	7.8	8.4
<i>Any use within the last 30 days</i>		6.7	2.3	3.6	65.7	75.6	72.7

### Tobacco from a water pipe (hookah)

	<i>Percent (%)</i>	<b>Actual Use</b>			<b>Perceived Use</b>		
		<b>Male</b>	<b>Female</b>	<b>Total</b>	<b>Male</b>	<b>Female</b>	<b>Total</b>
Never used		76.6	82.7	80.8	25.0	15.7	18.3
Used, but not in the last 30 days		20.0	15.3	16.8	21.8	17.4	18.7
Used 1-9 days		2.7	1.7	1.9	44.3	51.0	48.8
Used 10-29 days		0.2	0.3	0.3	6.2	13.0	11.1
Used all 30 days		0.5	0.1	0.2	2.7	2.9	3.1
<i>Any use within the last 30 days</i>		3.4	2.1	2.4	53.2	66.9	63.1

**Alcohol**

	Percent (%)	Actual Use			Perceived Use		
		Male	Female	Total	Male	Female	Total
Never used		15.5	13.9	14.5	4.9	3.0	3.7
Used, but not in the last 30 days		14.0	14.3	14.5	1.5	0.8	1.0
Used 1-9 days		47.9	55.2	52.9	33.4	24.7	27.0
Used 10-29 days		21.1	15.6	16.9	46.2	56.5	53.1
Used all 30 days		1.5	1.0	1.2	14.0	15.1	15.1
<b>Any use within the last 30 days</b>		70.5	71.8	71.0	93.6	96.2	95.3

**Marijuana**

	Percent (%)	Actual Use			Perceived Use		
		Male	Female	Total	Male	Female	Total
Never used		56.6	59.5	58.5	9.4	5.8	7.0
Used, but not in the last 30 days		21.1	22.3	22.3	7.4	3.6	4.6
Used 1-9 days		12.0	12.7	12.4	47.3	40.6	42.4
Used 10-29 days		7.8	3.4	4.6	28.8	37.8	34.9
Used all 30 days		2.5	2.1	2.2	7.1	12.2	11.1
<b>Any use within the last 30 days</b>		22.3	18.2	19.2	83.3	90.6	88.4

**Drinking and Driving**

- 1.5 % of college students reported driving after having **5 or more drinks** in the last 30 days.\*
- 26.8 % of college students reported driving after having **any alcohol** in the last 30 days.\*

\*Students responding "N/A, don't drive" and "N/A don't drink" were excluded from this analysis.

Estimated Blood Alcohol Concentration (or eBAC) of college students reporting 1 or more drinks the last time they "partied" or socialized. **Students reporting 0 drinks were excluded from the analysis.**

Due to the improbability of a student surviving a drinking episode resulting in an extremely high eBAC, all students with an eBAC of 0.50 or higher are also omitted from these eBAC figures. eBAC is an estimated figure based on the reported number of drinks consumed during the last time they "partied" or socialized, their approximate time of consumption, sex, weight, and the average rate of ethanol metabolism.

Estimated BAC	Percent (%)	Male	Female	Total
< .08		69.9	62.0	64.2
< .10		75.2	72.3	73.1
Mean		0.06	0.07	0.07
Median		0.04	0.06	0.05
Std Dev		0.07	0.07	0.07

*Findings continued*

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Reported number of drinks consumed the last time students "partied" or socialized. Only students reporting one or more drinks were included.

<b>Number of drinks*</b>	<b>Percent (%)</b>	<b>Male</b>	<b>Female</b>	<b>Total</b>
4 or fewer		45.2	61.7	57.3
5		11.3	11.6	11.6
6		8.7	9.7	9.2
7 or more		34.8	17.0	21.9
Mean		5.98	4.30	4.78
Median		5.00	4.00	4.00
Std Dev		5.39	2.92	3.90

\* Students reporting 0 drinks were excluded.

Reported number of times college students consumed five or more drinks in a sitting within the last two weeks:

	<b>Percent (%)</b>	<b>Male</b>	<b>Female</b>	<b>Total</b>
N/A don't drink		22.8	17.0	19.0
None		37.3	46.7	43.6
1-2 times		22.5	25.0	24.5
3-5 times		13.5	9.2	10.3
6 or more times		3.9	2.2	2.6

Percent of college students who reported using prescription drugs that were not prescribed to them within the last 12 months:

	<b>Percent (%)</b>	<b>Male</b>	<b>Female</b>	<b>Total</b>
Antidepressants		2.2	3.9	3.4
Erectile dysfunction drugs		0.5	0.8	0.8
Pain killers		3.7	4.5	4.3
Sedatives		4.9	4.7	4.7
Stimulants		11.1	10.8	10.7
<b><i>Used 1 or more of the above</i></b>		14.8	15.9	15.4

*Findings continued*

College students reported doing the following *most of the time* or *always* when they "partied" or socialized during the last 12 months:\*

	<b>Percent (%)</b>	<b>Male</b>	<b>Female</b>	<b>Total</b>
Alternate non-alcoholic with alcoholic beverages	27.3	31.3	30.5	
Avoid drinking games	31.8	36.2	34.8	
Choose not to drink alcohol	15.4	19.7	18.4	
Determine in advance not to exceed a set number of drinks	31.9	39.9	37.5	
Eat before and/or during drinking	80.3	85.2	83.8	
Have a friend let you know when you have had enough	33.7	45.8	42.3	
Keep track of how many drinks being consumed	61.9	66.5	65.6	
Pace drinks to one or fewer an hour	23.4	38.3	34.0	
Stay with the same group of friends the entire time drinking	86.6	92.7	91.0	
Stick with only one kind of alcohol when drinking	48.0	57.4	54.6	
Use a designated driver	85.8	87.9	87.2	
<b><i>Reported one or more of the above</i></b>	<b>97.3</b>	<b>99.3</b>	<b>98.8</b>	

\*Students responding "N/A, don't drink" were excluded from this analysis.

College students who drank alcohol reported experiencing the following in the last 12 months when drinking alcohol:\*

	<b>Percent (%)</b>	<b>Male</b>	<b>Female</b>	<b>Total</b>
Did something you later regretted	33.3	42.5	39.8	
Forgot where you were or what you did	33.6	34.8	34.4	
Got in trouble with the police	4.4	1.9	2.6	
Someone had sex with me without my consent	1.3	3.1	2.7	
Had sex with someone without their consent	0.0	0.2	0.2	
Had unprotected sex	25.8	28.6	28.0	
Physically injured yourself	14.1	13.9	13.7	
Physically injured another person	1.9	0.8	1.2	
Seriously considered suicide	3.7	2.6	3.1	
<b><i>Reported one or more of the above</i></b>	<b>53.9</b>	<b>58.7</b>	<b>57.4</b>	

\*Students responding "N/A, don't drink" were excluded from this analysis.

## F. Sexual Behavior

College students reported having the following number of sexual partners (oral sex, vaginal or anal intercourse) within the last 12 months:

	Percent (%)	Male	Female	Total
None		29.9	25.8	27.0
1		42.4	45.1	44.0
2		10.7	10.1	10.5
3		4.5	6.5	5.9
4 or more		12.5	12.5	12.6

Number of partners among students reporting to have at least one sexual partner within the last 12 months:\*

	Male	Female	Total
Mean	2.40	2.12	2.22
Median	1.00	1.00	1.00
Std Dev	2.99	2.02	2.40

\*Students reporting 0 sexual partners within the last 12 months were excluded.

College students reported having oral, vaginal or anal sex in the last 30 days:

### Oral sex within the past 30 days

	Percent (%)	Male	Female	Total
No, have never done this sexual activity		28.0	23.8	25.1
No, have done this sexual activity but not in the last 30 days		24.8	28.1	27.2
Yes		47.3	48.1	47.8

### Vaginal sex within the past 30 days

	Percent (%)	Male	Female	Total
No, have never done this sexual activity		30.0	27.3	28.0
No, have done this sexual activity but not in the last 30 days		19.6	19.9	20.1
Yes		50.5	52.8	51.9

### Anal sex within the past 30 days

	Percent (%)	Male	Female	Total
No, have never done this sexual activity		72.1	77.4	75.9
No, have done this sexual activity but not in the last 30 days		19.7	19.0	19.3
Yes		8.2	3.6	4.9



*Findings continued*

Using a condom or other protective barrier within the last 30 days (*mostly or always*):

	Percent (%)	Male	Female	Total
<i>Sexually active students reported*</i>				
Oral sex		3.3	4.5	4.3
Vaginal intercourse		50.7	41.4	44.2
Anal intercourse		25.8	16.7	21.3

\*Students responding "Never did this sexual activity" or "Have not done this during the last thirty days" were excluded from the analysis.

**Contraceptive use reported by students or their partner the last time they had vaginal intercourse:**

	Percent (%)	Male	Female	Total
<b>Yes, used a method of contraception</b>		<b>57.1</b>	<b>63.3</b>	<b>61.3</b>
Not applicable/Didn't use a method/Don't know		42.9	36.7	38.7

**If YES to contraceptive use the last time student had vaginal intercourse, reported means of birth control used among college students or their partner to prevent pregnancy:**

	Percent (%)	Male	Female	Total
Birth control pills (monthly or extended cycle)		68.0	63.5	64.5
Birth control shots		3.5	2.7	2.8
Birth control implants		4.4	5.2	4.9
Birth control patch		2.2	0.6	1.0
Vaginal ring		1.3	3.9	3.4
Intrauterine device		9.1	10.3	10.1
Male condom		65.2	53.9	57.2
Female condom		2.2	0.6	1.1
Diaphragm or cervical cap		0.9	0.2	0.3
Contraceptive sponge		0.9	0.0	0.2
Spermicide (foam, jelly, cream)		6.5	2.0	3.2
Fertility awareness (calendar, mucous, basal body temperature)		6.1	10.2	9.2
Withdrawal		33.9	42.5	39.9
Sterilization (hysterectomy, tubes tied, vasectomy)		2.6	2.0	2.3
Other method		3.1	0.9	1.5
<b><i>Male condom use plus another method</i></b>		<b>53.7</b>	<b>46.1</b>	<b>48.4</b>
<b><i>Any two or more methods (excluding male condoms)</i></b>		<b>35.8</b>	<b>44.3</b>	<b>41.9</b>

- 13.7 % of sexually active college students reported using (or reported their partner used) emergency contraception ("morning after pill") within the last 12 months.  
(male: 11.7 %; female: 14.9 %).\*

\*Students responding "Not sexually active" were excluded from the analysis.

- 0.6 % of college students who had vaginal intercourse within the last 12 months reported experiencing an unintentional pregnancy or got someone pregnant within the last 12 months.  
(male: 0.0 %; female: 0.7 %).\*\*

\*\*Students responding "Have not had vaginal intercourse within the last 12 months" were excluded from the analysis.

## G. Nutrition and Exercise

College students reported usually eating the following number of servings of fruits and vegetables per day:

	Percent (%)	Male	Female	Total
0 servings per day		7.1	6.5	6.5
1-2 per day		67.6	62.8	64.2
3-4 per day		22.4	26.7	25.5
5 or more per day		2.9	4.0	3.8

College students reported the following behaviors within the past 7 days:

### Do moderate-intensity cardio or aerobic exercise for at least 30 minutes:

	Percent (%)	Male	Female	Total
0 days		16.7	16.7	16.7
1-4 days		57.6	61.5	60.3
5-7 days		25.6	21.9	23.0

### Do vigorous-intensity cardio or aerobic exercise for at least 20 minutes:

	Percent (%)	Male	Female	Total
0 days		30.5	39.9	37.6
1-2 days		32.8	31.6	31.7
3-7 days		36.7	28.5	30.7

Physical Activity and Public Health: Updated Recommendations for Adults. From the American College of Sports Medicine and the American Heart Association (2007): Moderate-intensity cardio or aerobic exercise for at least 30 minutes on 5 or more days per week, or vigorous-intensity cardio or aerobic exercise for at least 20 minutes on 3 or more days per week.

**Students meeting the Recommendations for moderate-intensity exercise, vigorous-intensity exercise, or a combination of the two (2 moderate-intensity exercise periods = 1 vigorous-intensity exercise period).**

	Percent (%)	Male	Female	Total
Guidelines met		56.8	49.0	51.0

Estimated average Body Mass Index (BMI): This figure incorporates reported height, and weight to form a general indicator of physical health. Categories defined by The World Health Organization (WHO) 2000, reprinted 2004. Obesity: Preventing and Managing the Global Epidemic. WHO Tech Report Series: 894.

<b>BMI</b>	<b>Percent (%)</b>	<b>Male</b>	<b>Female</b>	<b>Total</b>
<18.5 Underweight		1.7	5.0	4.3
18.5-24.9 Healthy Weight		51.6	60.4	57.9
25-29.9 Overweight		32.8	19.3	23.0
30-34.9 Class I Obesity		9.9	9.6	9.7
35-39.9 Class II Obesity		2.2	3.0	2.7
≥40 Class III Obesity		1.7	2.8	2.4
Mean		25.57	24.61	24.85
Median		24.41	23.17	23.57
Std Dev		5.16	5.76	5.59

## H. Mental Health

Students reported experiencing the following within the last 12 months:

### Felt things were hopeless

<b>Percent (%)</b>	<b>Male</b>	<b>Female</b>	<b>Total</b>
No, never	38.9	33.2	34.8
No, not last 12 months	20.0	20.5	20.2
Yes, last 2 weeks	15.6	16.4	16.4
Yes, last 30 days	7.2	9.4	8.7
Yes, in last 12 months	18.3	20.5	19.9
<i>Any time within the last 12 months</i>	41.1	46.4	45.0

### Felt overwhelmed by all you had to do

<b>Percent (%)</b>	<b>Male</b>	<b>Female</b>	<b>Total</b>
No, never	11.6	6.2	7.8
No, not last 12 months	8.9	2.4	4.2
Yes, last 2 weeks	40.6	57.6	53.0
Yes, last 30 days	20.3	15.2	16.4
Yes, in last 12 months	18.6	18.6	18.5
<i>Any time within the last 12 months</i>	79.5	91.4	88.0

### Felt exhausted (not from physical activity)

<b>Percent (%)</b>	<b>Male</b>	<b>Female</b>	<b>Total</b>
No, never	15.3	8.5	10.5
No, not last 12 months	7.9	4.3	5.4
Yes, last 2 weeks	43.5	54.5	51.4
Yes, last 30 days	18.3	15.8	16.5
Yes, in last 12 months	15.1	16.8	16.2
<i>Any time within the last 12 months</i>	76.8	87.1	84.1

### Felt very lonely

<b>Percent (%)</b>	<b>Male</b>	<b>Female</b>	<b>Total</b>
No, never	27.7	20.9	22.9
No, not last 12 months	24.2	18.4	20.0
Yes, last 2 weeks	15.6	26.2	23.3
Yes, last 30 days	12.1	12.1	12.1
Yes, in last 12 months	20.5	22.5	21.7
<i>Any time within the last 12 months</i>	48.1	60.7	57.1

**Felt very sad**

Percent (%)	Male	Female	Total
No, never	23.5	17.9	19.5
No, not last 12 months	23.3	15.4	17.6
Yes, last 2 weeks	15.6	28.0	24.6
Yes, last 30 days	11.6	12.6	12.4
Yes, in last 12 months	26.0	26.1	25.9
<i>Any time within the last 12 months</i>	53.2	66.7	62.9

**Felt overwhelming anxiety**

Percent (%)	Male	Female	Total
No, never	37.9	25.0	28.9
No, not last 12 months	14.9	9.6	11.0
Yes, last 2 weeks	15.1	26.7	23.5
Yes, last 30 days	12.4	13.8	13.6
Yes, in last 12 months	19.8	24.9	23.0
<i>Any time within the last 12 months</i>	47.3	65.4	60.1

**Seriously considered suicide**

Percent (%)	Male	Female	Total
No, never	75.4	77.3	76.6
No, not last 12 months	14.6	13.0	13.4
Yes, last 2 weeks	1.7	1.7	1.7
Yes, last 30 days	1.5	1.8	1.8
Yes, in last 12 months	6.7	6.3	6.6
<i>Any time within the last 12 months</i>	9.9	9.7	10.1

**Intentionally cut, burned, bruised, or otherwise injured yourself**

Percent (%)	Male	Female	Total
No, never	87.8	81.1	82.9
No, not last 12 months	7.7	12.3	11.2
Yes, last 2 weeks	0.2	0.9	0.7
Yes, last 30 days	1.2	0.5	0.7
Yes, in last 12 months	3.0	5.2	4.5
<i>Any time within the last 12 months</i>	4.5	6.6	5.9

**Felt so depressed that it was difficult to function**

Percent (%)	Male	Female	Total
No, never	49.0	43.5	45.1
No, not last 12 months	22.3	21.6	21.7
Yes, last 2 weeks	6.4	9.0	8.4
Yes, last 30 days	9.2	6.6	7.3
Yes, in last 12 months	13.1	19.3	17.5
<i>Any time within the last 12 months</i>	28.7	34.9	33.2

**Felt overwhelming anger**

Percent (%)	Male	Female	Total
No, never	41.2	41.0	40.9
No, not last 12 months	24.3	22.2	22.7
Yes, last 2 weeks	9.4	10.5	10.4
Yes, last 30 days	7.4	9.1	8.7
Yes, in last 12 months	17.6	17.3	17.3
<i>Any time within the last 12 months</i>	34.5	36.8	36.4

**Attempted suicide**

Percent (%)	Male	Female	Total
No, never	91.0	92.9	92.2
No, not last 12 months	7.0	6.1	6.5
Yes, last 2 weeks	0.2	0.2	0.2
Yes, last 30 days	0.2	0.2	0.2
Yes, in last 12 months	1.5	0.6	0.9
<i>Any time within the last 12 months</i>	2.0	1.0	1.3

Within the last 12 months, diagnosed or treated by a professional for the following:

	Percent (%)	Male	Female	Total
Anorexia		0.7	2.0	1.9
Anxiety		11.6	24.3	20.8
Attention Deficit and Hyperactivity Disorder		8.2	10.3	9.9
Bipolar Disorder		1.5	1.2	1.4
Bulimia		0.7	1.0	1.0
Depression		9.2	17.2	15.2
Insomnia		4.9	5.6	5.7
Other sleep disorder		3.2	2.5	2.8
Obsessive Compulsive Disorder		1.7	3.8	3.4
Panic attacks		4.2	13.1	10.8
Phobia		0.7	1.3	1.2
Schizophrenia		0.2	0.2	0.3
Substance abuse or addiction		1.2	0.5	0.9
Other addiction		0.7	0.6	0.8
Other mental health condition		3.0	2.8	3.0
<i>Students reporting none of the above</i>		79.0	65.0	68.8
<i>Students reporting only one of the above</i>		9.9	12.6	11.7
<i>Students reporting both Depression and Anxiety</i>		6.4	13.7	12.0
<i>Students reporting any two or more of the above excluding the combination of Depression and Anxiety</i>		6.2	10.3	9.6

Within the last 12 months, any of the following been traumatic or very difficult to handle:

	Percent (%)	Male	Female	Total
Academics		36.5	48.6	45.3
Career-related issue		22.6	27.3	26.1
Death of family member or friend		9.4	16.9	14.8
Family problems		17.8	27.7	25.0
Intimate relationships		24.5	32.4	30.1
Other social relationships		18.0	27.8	25.4
Finances		26.5	33.0	31.3
Health problem of family member or partner		14.1	19.0	17.6
Personal appearance		16.7	32.1	27.8
Personal health issue		14.6	22.2	20.3
Sleep difficulties		25.3	29.8	28.8
Other		6.5	7.3	7.4
<i>Students reporting none of the above</i>		34.3	22.8	26.1
<i>Students reporting only one of the above</i>		15.6	11.8	12.6
<i>Students reporting 2 of the above</i>		12.3	12.9	12.7
<i>Students reporting 3 or more of the above</i>		37.8	52.6	48.5

**Within the last 12 months, how would you rate the overall level of stress experienced:**

	<i>Percent (%)</i>	<b>Male</b>	<b>Female</b>	<b>Total</b>
No stress		3.0	0.7	1.4
Less than average stress		10.8	4.1	6.0
Average stress		40.1	36.3	37.4
More than average stress		40.4	46.9	44.9
Tremendous stress		5.7	12.0	10.3

## I. Sleep

**Past 7 days, getting enough sleep to feel rested in the morning:**

	<i>Percent (%)</i>	<b>Male</b>	<b>Female</b>	<b>Total</b>
0 days		8.1	7.9	8.2
1-2 days		26.0	32.5	30.4
3-5 days		53.3	48.6	50.1
6+ days		12.5	11.0	11.3

**Past 7 days, how often felt tired, dragged out, or sleepy during the day:**

	<i>Percent (%)</i>	<b>Male</b>	<b>Female</b>	<b>Total</b>
0 days		11.4	5.2	6.8
1-2 days		35.6	29.2	31.1
3-5 days		41.2	50.5	47.8
6+ days		11.9	15.1	14.3

**Past 7 days, how much of a problem with sleepiness during daytime activities:**

	<i>Percent (%)</i>	<b>Male</b>	<b>Female</b>	<b>Total</b>
No problem		13.6	7.2	8.9
A little problem		52.8	48.9	50.2
More than a little problem		22.2	26.7	25.4
A big problem		9.9	12.7	12.1
A very big problem		1.5	4.4	3.5

## Demographics and Student Characteristics

### ■ Age:

18 - 20 years:	45.4 %
21 - 24 years:	32.6 %
25 - 29 years:	11.7 %
30+ years:	10.3 %

### ■ Gender\*

Female:	70.2 %
Male:	28.1 %
Non-binary	1.7 %

### ■ Student status:

1st year undergraduate:	20.4 %
2nd year undergraduate:	18.2 %
3rd year undergraduate:	15.5 %
4th year undergraduate:	15.9 %
5th year or more undergraduate:	2.3 %
Graduate or professional:	27.5 %
Not seeking a degree:	0.1 %
Other:	0.1 %
Full-time student:	92.7 %
Part-time student:	6.2 %
Other student:	1.1 %

### ■ Relationship status:

Not in a relationship:	50.6 %
In a relationship but not living together:	32.5 %
In a relationship and living together:	16.9 %

### ■ Marital status:

Single:	86.3 %
Married/Partnered:	12.1 %
Separated/Divorced/Other:	1.6 %

### ■ Primary Source of Health Insurance:

College/university sponsored plan:	10.3 %
Parents' plan:	71.2 %
Another plan:	15.4 %
Don't have health insurance:	2.3 %
Not sure if have plan:	0.8 %

### ■ Students describe themselves as:

White:	80.7 %
Black or African American:	7.4 %
Hispanic or Latino/a:	4.7 %
Asian or Pacific Islander:	7.3 %
American Indian, Alaskan Native or Native Hawaiian:	1.3 %
Biracial or Multiracial:	2.4 %
Other:	1.8 %

### ■ International Student:

International:	6.5 %
----------------	-------

### ■ Students describe themselves as:

Asexual:	4.9 %
Bisexual:	4.3 %
Gay:	1.0 %
Lesbian:	0.7 %
Pansexual:	0.5 %
Queer:	0.2 %
Questioning:	0.4 %
Same Gender Loving:	0.1 %
Straight/Heterosexual:	87.0 %
Another identity:	0.8 %

### ■ Housing:

Campus residence hall:	24.3 %
Fraternity or sorority house:	1.6 %
Other university housing:	2.2 %
Parent/guardian home:	6.7 %
Other off-campus housing:	59.6 %
Other:	5.6 %

### ■ Participated in organized college athletics:

Varsity:	2.1 %
Club sports:	8.1 %
Intramurals:	18.4 %

### ■ Member of a social fraternity or sorority:

Greek member:	22.3 %
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\* See note on page 2 regarding gender categories



## **Appendix F:**

### **Survey: Alcohol Edu Summary**



# University of South Carolina - Columbia AlcoholEdu for College

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Impact Report  
2016-2017

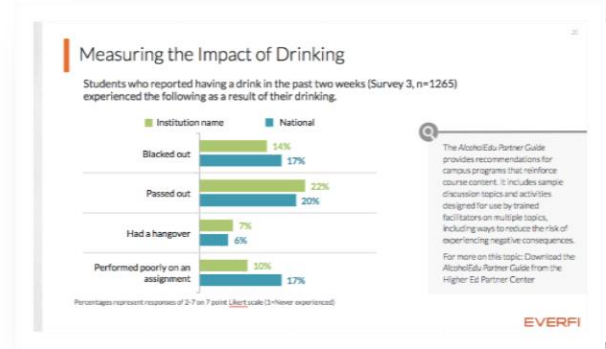
# Introduction

This report provides key insights from your *AlcoholEdu for College* data. We encourage you to share this report, or specific slides from this report, with others on your campus.

To help facilitate that process, we have included references to related studies or resources that offer important context for understanding the data provided. This information offers a framework for those who may not be familiar with EverFi or the *AlcoholEdu for College* course structure, content, and data. It will assist you and your colleagues in utilizing your *AlcoholEdu* data to inform prevention efforts on your campus.



For deeper insights, the EverFi Analytics Platform provides real-time graphic representations of your EverFi data. In addition to on-demand data, you also have the ability to download the raw data files for all three *AlcoholEdu* surveys. If you added custom questions to the course survey, those data may be accessed on the platform as well.



# Your Impact Report Outline



About EverFi

About *AlcoholEdu for College*

Your Students' Drinking Behavior

Next Steps



# About EverFi



Our mission in higher education is to drive lasting, large-scale change on critical wellness issues facing students, faculty, and staff.

We help institutions make transformative impact on sexual assault, high-risk drinking, and financial education through evidence-based online programs, data, and advisory services.



# Our Experience – Higher Education

**5 Million**  
educated in the last year

**16+**  
years of  
experience

**1,300+**  
institutional  
partners

**30+**  
greek  
organizations

**Eight**  
efficacy  
studies



Fostering healthy relationships, awareness of resources and policies, and skill-building among students and employees



Promoting healthy habits through adaptive learning, realistic scenarios and hands-on activities



Helping fraternity & sorority members make better decisions about alcohol, hazing & sexual assault



Encouraging students to make smarter decisions about finances, student loans, financial aid and more



# The Benefits of Partnering With EverFi



## PROVEN EFFICACY

Eight independent studies have been published demonstrating the efficacy of EverFi online programs. Our approach improves knowledge, attitudes, and behaviors.



## TRUE EXPERTISE

Our team includes public health professionals, administrators from student affairs, campus prevention offices, and more. Extend your team by partnering with ours.



## GETTING BEYOND COMPLIANCE

Our online programs are built by prevention and compliance experts to meet and exceed requirements from Title IX, Clery Act (Campus SaVE/VAWA), EDGAR part 86.



## DATA-DRIVEN

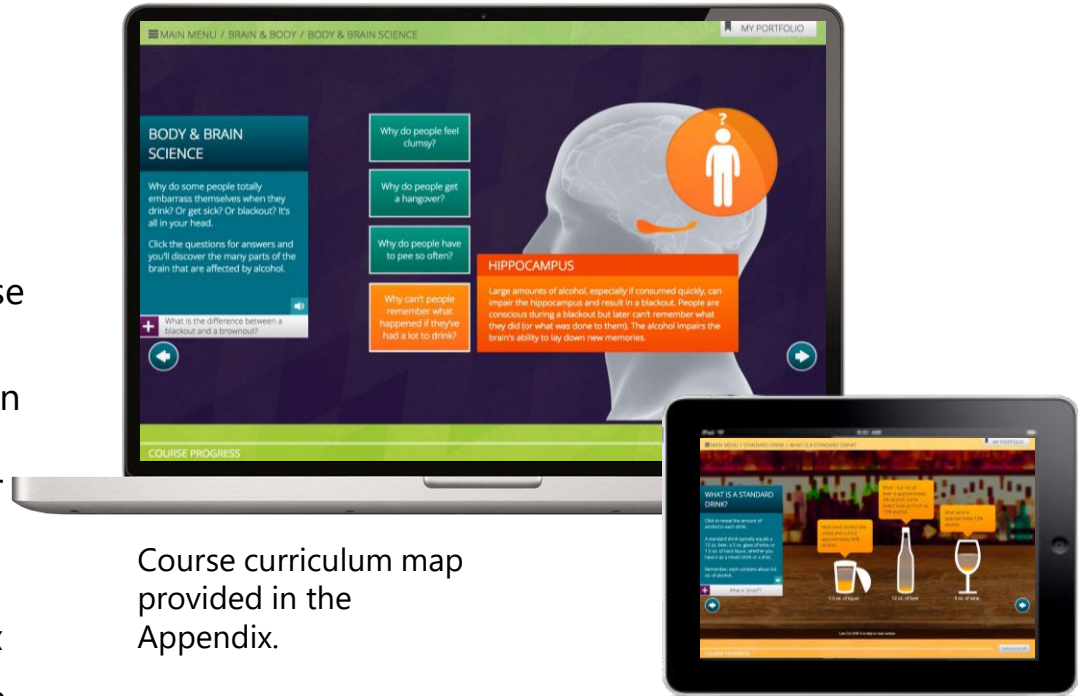
Our data and analytics provide real-time access to attitudinal and behavioral data from your unique populations, and national benchmarks to assess needs and strengths.



## About *AlcoholEdu* for College

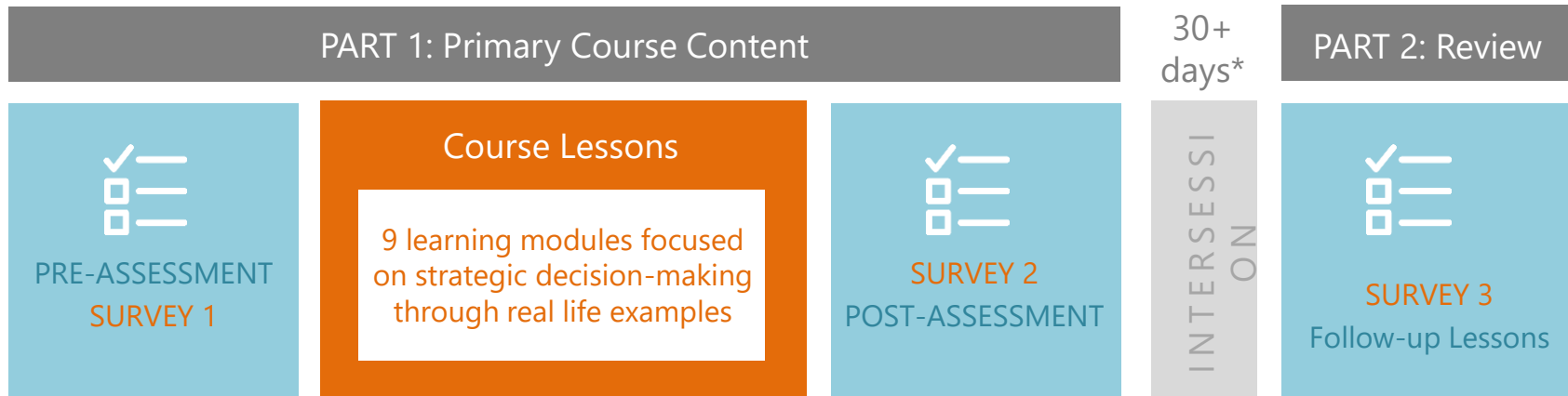
# The *AlcoholEdu* for College Course

- Developed in collaboration with leading prevention experts and researchers
- Interactive content guided by recommendations from the National Institute of Alcohol Abuse and Alcoholism (NIAAA)
- Informed by emerging research on evidence-based practice (e.g., social norms approach, bystander intervention)
- Cited as a top-tier strategy by NIAAA in their CollegeAIM Matrix
- Most widely used universal online AOD prevention program since its development in 2000



Course curriculum map provided in the Appendix.

# Course Structure and Resulting Data Set



\*Length of intersession is determined by individual schools.

**SURVEYS** measure changes in attitudes and behaviors

**ASSESSMENTS** are tests and quizzes that measure student knowledge

Data in this report are based on responses from **5433** students at your Institution who completed all 3 *AlcoholEdu for College* surveys in the fall of 2016. Where available, data is benchmarked against the national aggregate (N= 340510).



# A Profile of Your Students' Drinking Behavior

# Highlights from Your Data

**25%** of your students reported **drinking in a high risk way**, when measured midway through the fall term (Survey 3, n=5433).

**18%** of your students reported **not drinking in the past two weeks**, with 25% indicating **not drinking in the past year**. (Survey 3, n=5433)

**85%** of your students, after completing *AlcoholEdu* (Survey 2, n=5433), reported that the course prepared them to **make responsible decisions about drinking**.

**The following are based on responses provided by your students in Survey 3 (n=5433):**

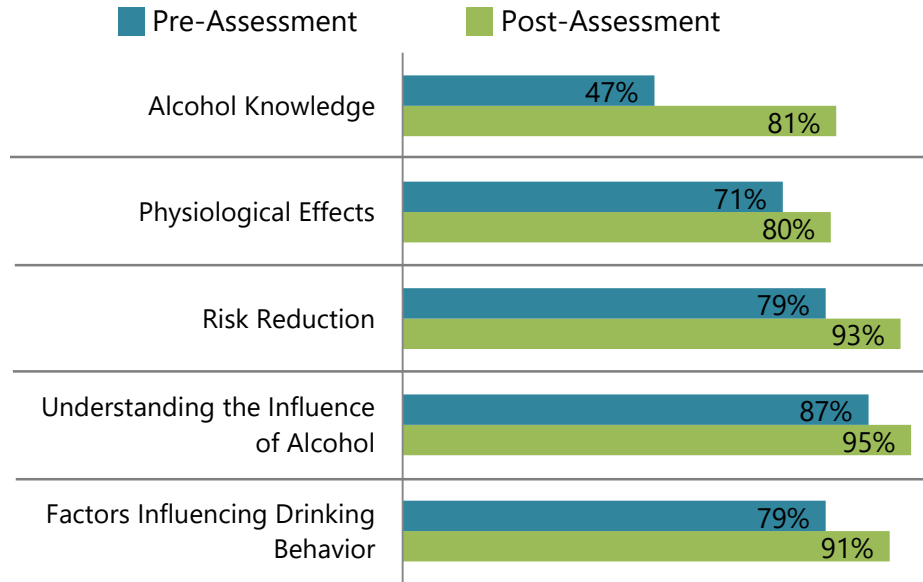
The most common drinking-related risk behaviors that your students engage in are **Pregaming** and **Doing Shots**.

Two of **the most frequently reported negative consequences of drinking** are **Had a hangover** and **Blacked Out**.

Students reported that some of the **most important reasons not to drink** are because **I'm going to drive** and that **I don't want to spend the money**.

# Formative Assessments and Knowledge Gains

OVERALL KNOWLEDGE CHANGE	Pre-Assessment	Post-Assessment	Increase
	74%	86%	22%



**Note:** National Pre- and Post-Assessment data is provided in the Appendix.  
Full assessment item text is available upon request.

Your students reported that *AlcoholEdu*:

Prepared them to prevent an alcohol overdose **84%**

Prepared them to help someone who may have alcohol poisoning **87%**

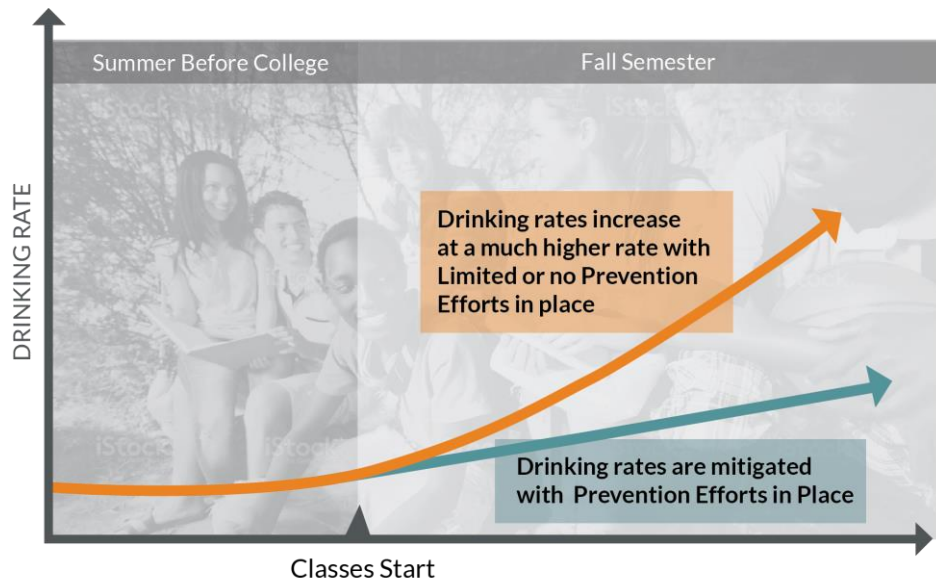
Helped them establish a plan ahead of time to make responsible decisions about drinking **85%**

Changed their perceptions of other's drinking behavior **59%**



# Important Context for Reviewing Your Data: Understanding the "College Effect"

National student drinking rates follow a typical pattern: alcohol use generally rises the summer before a student enters college, and then increases substantially after their arrival on campus. This phenomenon, known as the "College Effect," is represented by the conceptual graphic below.



## Mitigating The College Effect

There is a narrow window of opportunity for primary prevention. Through evidence-based education and prevention efforts, including *AlcoholEdu*, institutions can mitigate the impact of the College Effect.

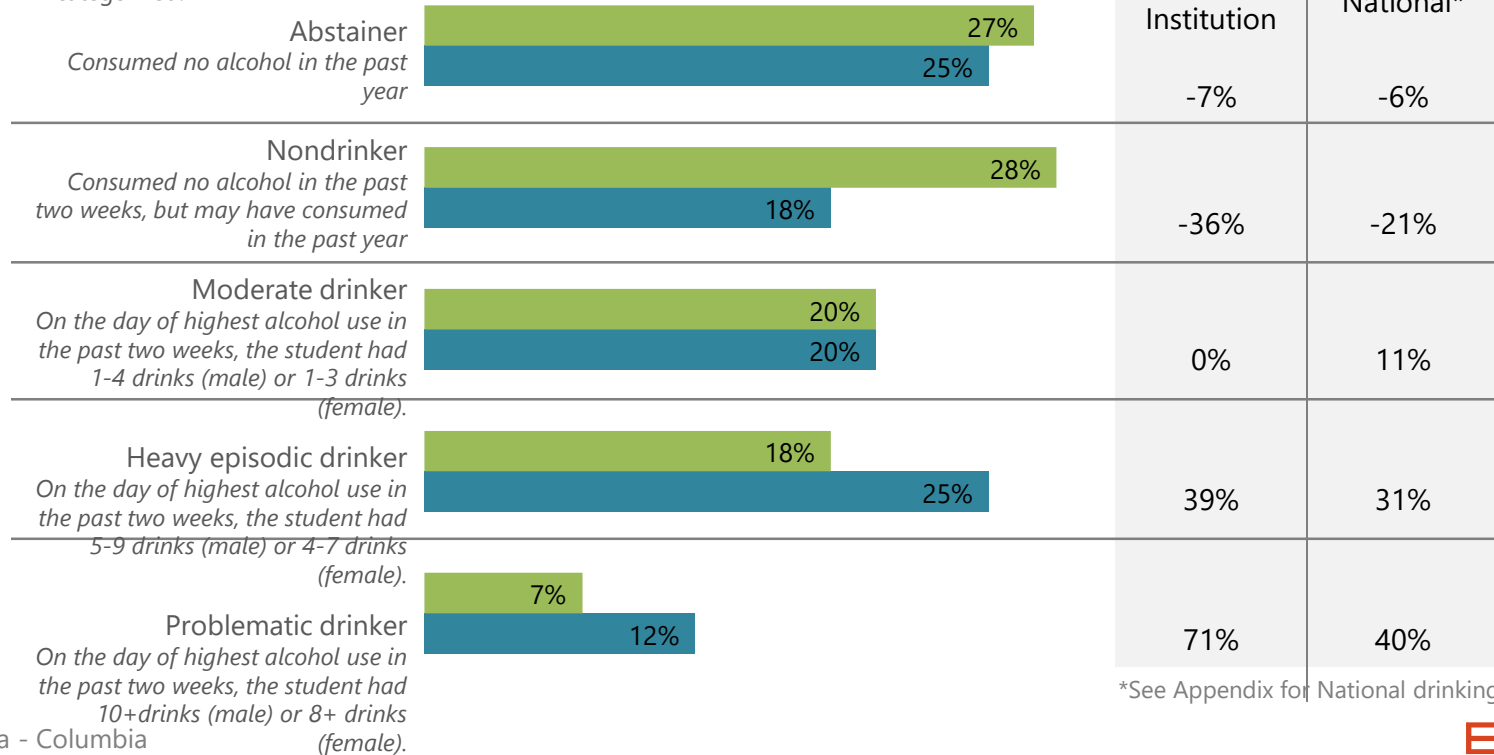
Such efforts must consider the need to focus on all students, not just those who have a prior history of heavy or problematic drinking. Efforts aimed at reinforcing the behaviors of the healthy majority should not be overlooked.

# Examining Changes in Drinking Rates

■ Survey 1 (n=5359)

■ Survey 3 (n=5236)

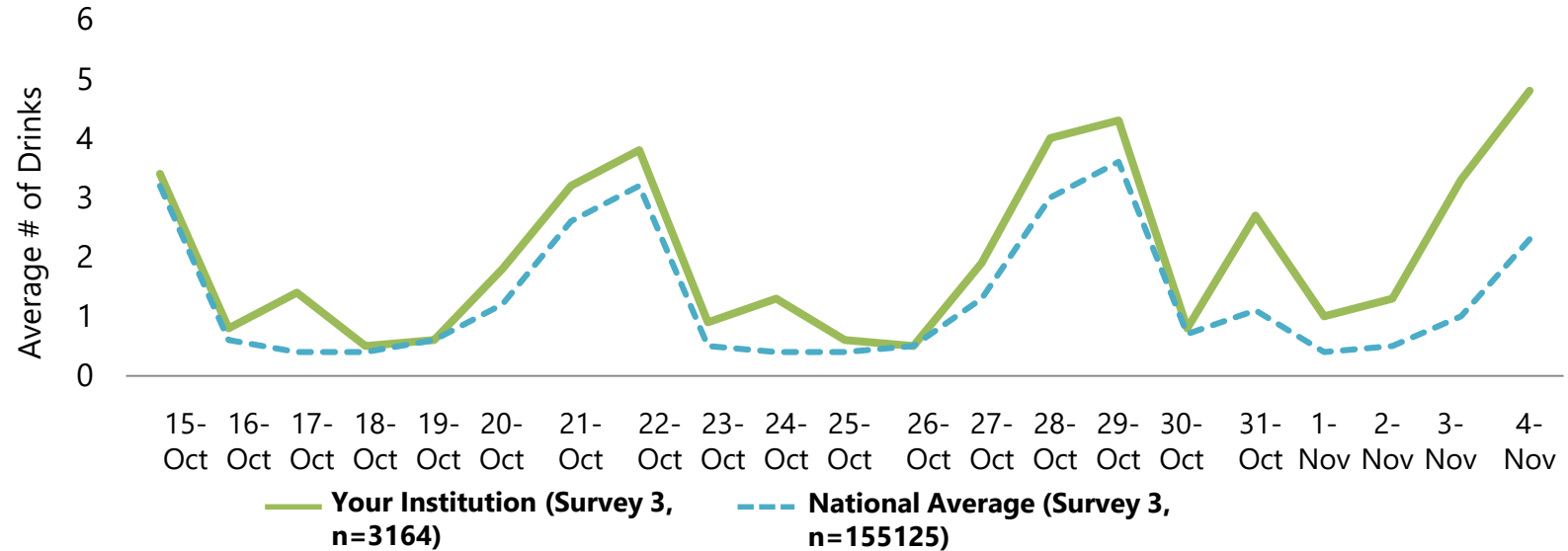
Note: n-sizes exclude those students who did not provide enough survey data to be categorized.



\*See Appendix for National drinking rates.

# Peak Drinking Days

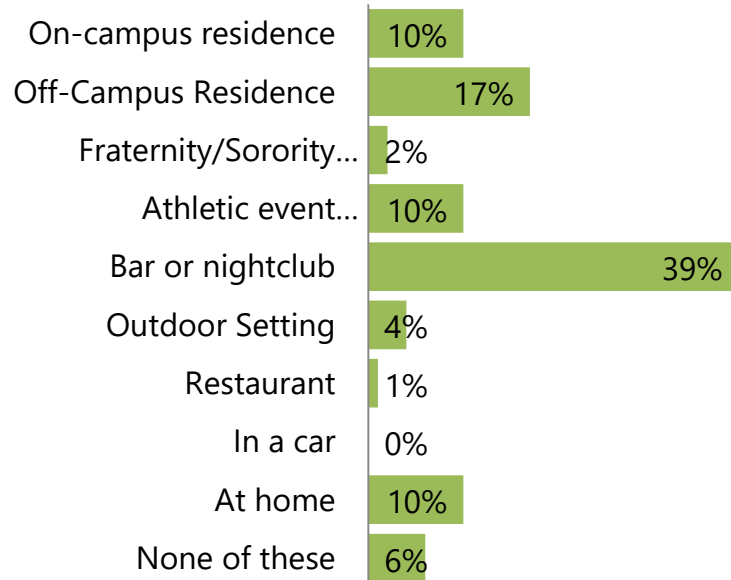
Below is a snapshot of student drinking rates over a 3-week period of time. It represents the average number of drinks consumed by your students (drinkers only) as compared to the national average during that same 3-week period.



**Note:** The date range for the above graph was selected as the peak drinking period for our national aggregate and may not represent the peak drinking days for your institution.

# Where Students Drink

The most common location where your students report consuming alcohol in the past two weeks (Survey 3, drinkers only, n = 3164):



Certain drinking locations – on campus pubs, off-campus house parties – have been shown to be associated with significant negative consequences (EverFi, 2012).

The same study also indicated that certain locations (on-campus dances and concerts) have a greater relationship with sexual assault than other locations.

**Note:** Last year, students could select multiple common locations; this year they could only select the most common location.

# Student Reasons for Not Drinking

Both drinkers and non-drinkers indicated their most important reasons for choosing whether or not to drink alcohol (Survey 3, n = 5433).

**When you choose NOT to drink alcohol, how important are the following reasons:**

**Percentage  
Important/Very  
Important\***

I'm going to drive

**72%**

I don't want to spend the money

**50%**

I have other things to do

**43%**

I am worried about being caught by authorities

**%**

I don't have to drink to have a good time

**32%**

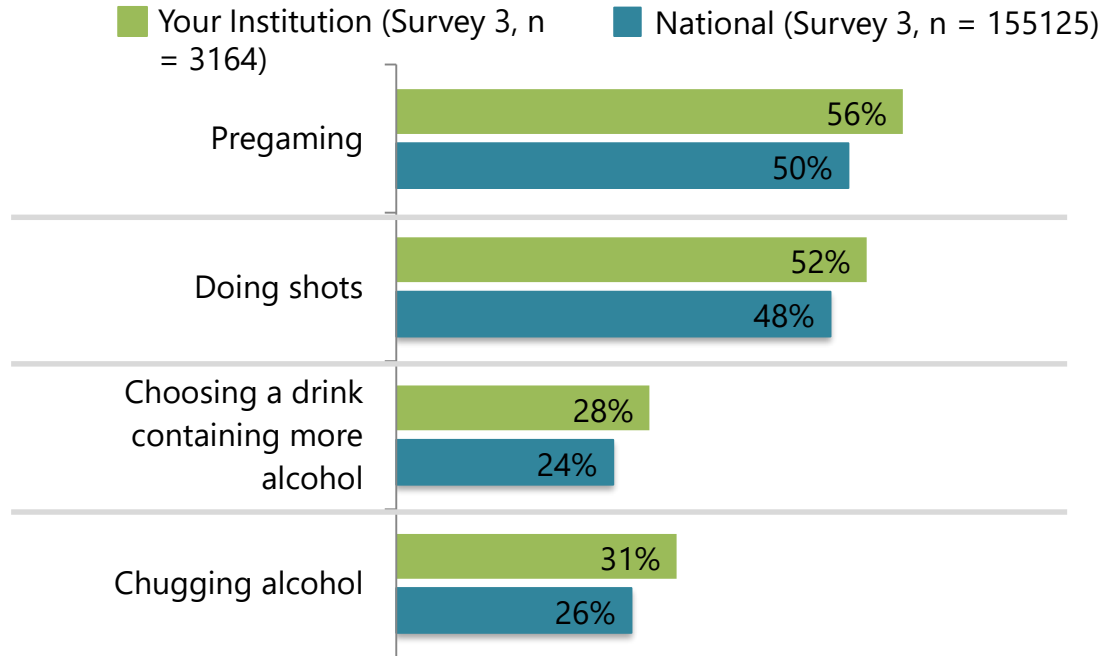


"It would be far easier to increase the salience of existing reasons that drinkers have for restricting their alcohol use than to win their endorsement of still additional reasons that are primarily endorsed by abstainers (Huang et al., 2011)."

\*Percentages represent responses of 5-7 on 7 point Likert scale (1=Not at all important, 7=Very important)

# High-Risk Drinking Behaviors

These are some of the most common risk-related drinking behaviors reported by your students who had a drink in the past two weeks:



Percentages represent responses of 5-7 on 7 point Likert scale (1=Never)



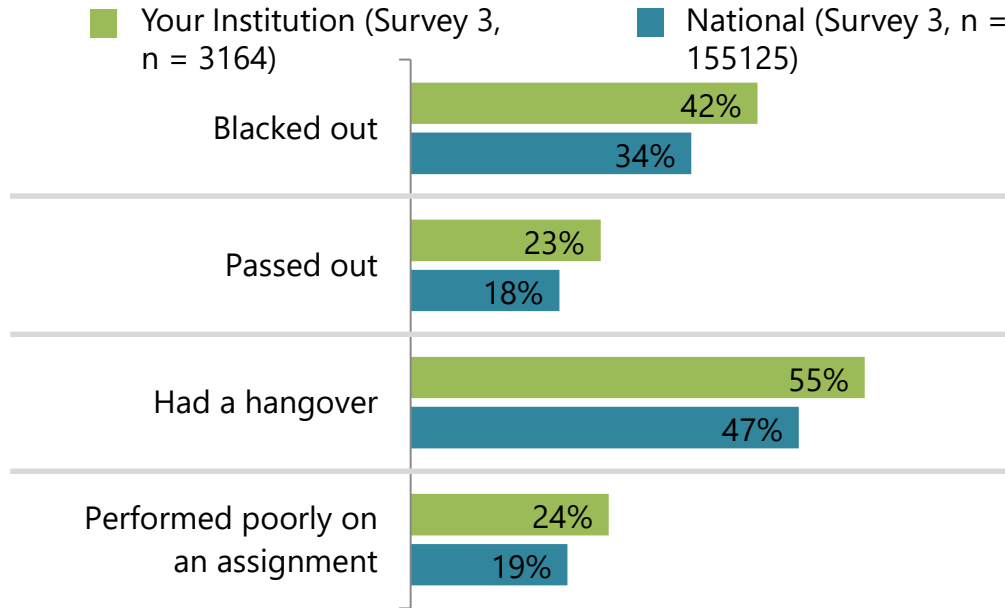
More than other high-risk behaviors, pregameing has been shown to have a predictive relationship with a variety of negative outcomes (EverFi, 2012).

As such, pregameing can potentially be used as a marker to identify students who are more likely to be at risk for negative consequences.

For more on this topic, see: *Strategic Drinking – Examining the Culture of Pregameing* (Webinar recording)

# Measuring the Impact of Drinking

Students who reported drinking in the past two weeks experienced the following as a result of their drinking:



Percentages represent responses of 2-7 on 7 point Likert scale (1=Never experienced)



The *AlcoholEdu Partner Guide* provides recommendations for campus programs that reinforce course content. It includes sample discussion topics and activities designed for use by trained facilitators, including ways to reduce the risk of experiencing negative consequences.

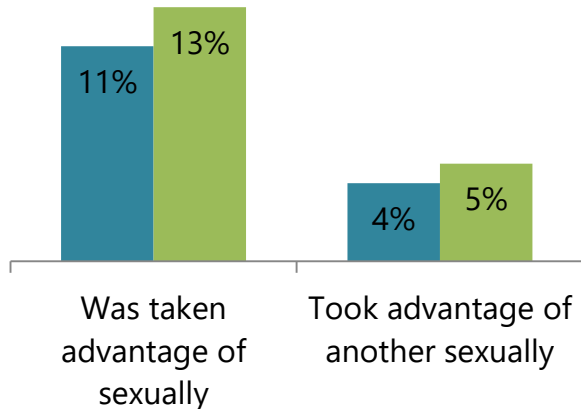
For more on this topic: Download the *AlcoholEdu Partner Guide* from the Higher Ed Partner Center Resources Tab



# The Role of Alcohol in Sexual Assault

Students who drank in the past two weeks reported that the following occurred in conjunction with their drinking:

■ National (Survey 3, n = 155125)    ■ Your Institution (Survey 3, n = 3164)



Percentages represent responses of 2-7 on 7-point Likert scale (1=Never experienced)

"The fact that alcohol consumption and sexual assault frequently co-occur does not demonstrate that alcohol causes sexual assault."

(ABBEY, 2008)

## Insights from *Haven: Understanding Sexual Assault*

**Students with unhealthy attitudes regarding sexual violence:**

- are much more likely to perpetrate sexual assault
- have higher rates of alcohol use (frequency and quantity)
- are *much* more likely to experience alcohol-related problems

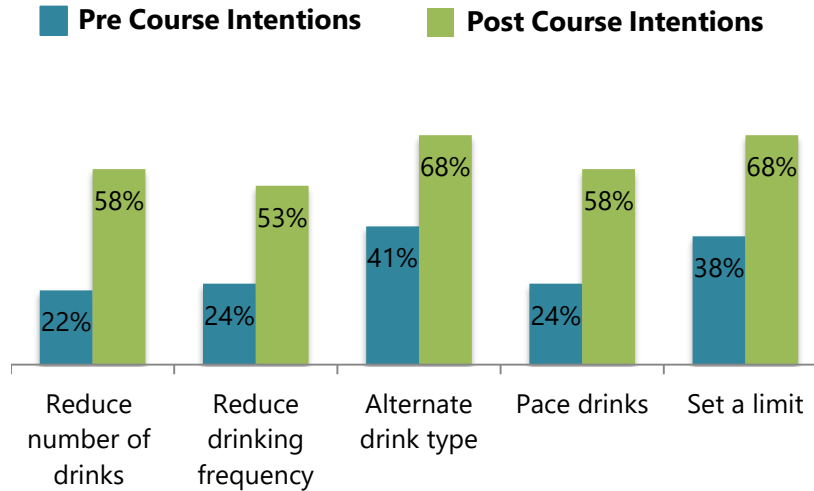


How do we effectively identify and intervene with students at risk for being victimized or perpetrating sexual assault?

For more on this topic, see: *Alcohol and Sexual Assault – Unpacking the Connections and Implications for Practice* (Webinar recording)

# The Importance of Behavioral Intentions

After completing *AlcoholEdu*, students reported an increase in several positive behavioral intentions.



Data represents student responses collected in Survey 1 (Pre-course) and Survey 2 (Post-course).

## Impact For High-risk Students:

Among the **56%** of high risk drinkers (**775 students**) who saw **"no need to change the way they drink"** before taking *AlcoholEdu*, **45%** of those students (**347 students**) indicated their readiness to change after completing the course.



Intention has been shown to be the most important variable in predicting behavior change (Ajzen, 1991). Actual behavior change is driven, in part, by an individual's perception of the social environment surrounding the behavior (subjective norms). As such, a campus environment that reinforces safe and healthy norms can help support individual intentions and, ultimately, change in behavior.



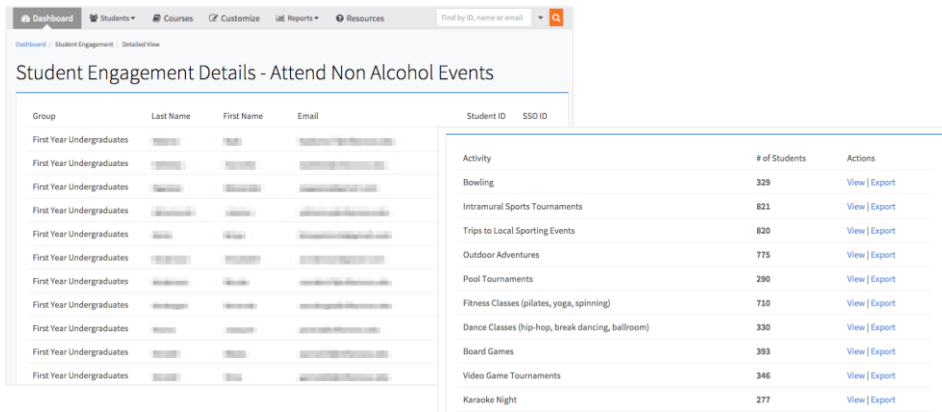
## Next Steps

# Engage Your Students

Effective prevention includes actively engaging students to reinforce positive behavioral intentions of all students: drinkers and non-drinkers alike.

## Interest in Alcohol-Free Activities

Your students voluntarily provided their name and email address in order to be contacted regarding alcohol-free activities. Lists of students who want to attend such activities, along with the specific types of activities they are interested in, can be downloaded from the Higher Ed Partner Center.



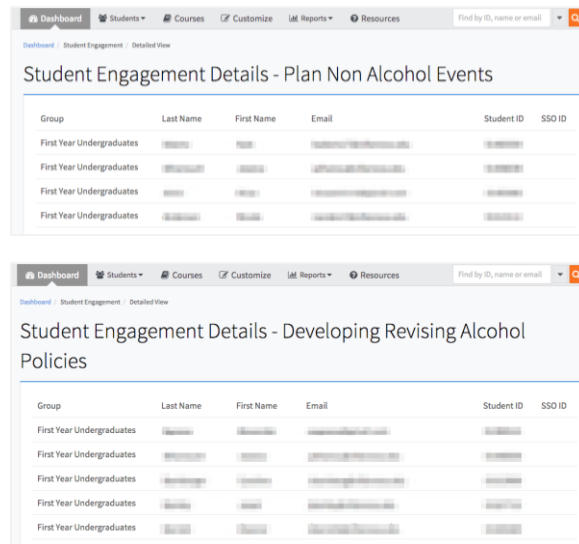
The screenshot displays the 'Student Engagement Details - Attend Non Alcohol Events' page. It features a table with columns for Group, Last Name, First Name, Email, Student ID, and SSO ID. Below this table, there is a detailed view of activities and the number of students interested in each.

Group	Last Name	First Name	Email	Student ID	SSO ID
First Year Undergraduates	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
First Year Undergraduates	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
First Year Undergraduates	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
First Year Undergraduates	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
First Year Undergraduates	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
First Year Undergraduates	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
First Year Undergraduates	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
First Year Undergraduates	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
First Year Undergraduates	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
First Year Undergraduates	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]

Activity	# of Students	Actions
Bowling	329	<a href="#">View</a>   <a href="#">Export</a>
Intramural Sports Tournaments	821	<a href="#">View</a>   <a href="#">Export</a>
Trips to Local Sporting Events	820	<a href="#">View</a>   <a href="#">Export</a>
Outdoor Adventures	775	<a href="#">View</a>   <a href="#">Export</a>
Pool Tournaments	290	<a href="#">View</a>   <a href="#">Export</a>
Fitness Classes (pilates, yoga, spinning)	710	<a href="#">View</a>   <a href="#">Export</a>
Dance Classes (hip-hop, break dancing, ballroom)	330	<a href="#">View</a>   <a href="#">Export</a>
Board Games	393	<a href="#">View</a>   <a href="#">Export</a>
Video Game Tournaments	346	<a href="#">View</a>   <a href="#">Export</a>
Karaoke Night	277	<a href="#">View</a>   <a href="#">Export</a>

## Additional Engagement Opportunities



The screenshot displays the 'Student Engagement Details - Plan Non Alcohol Events' page. It features a table with columns for Group, Last Name, First Name, Email, Student ID, and SSO ID. Below this table, there is a detailed view of activities and the number of students interested in each.

Group	Last Name	First Name	Email	Student ID	SSO ID
First Year Undergraduates	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
First Year Undergraduates	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
First Year Undergraduates	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
First Year Undergraduates	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]

Activity	# of Students	Actions
Bowling	329	<a href="#">View</a>   <a href="#">Export</a>
Intramural Sports Tournaments	821	<a href="#">View</a>   <a href="#">Export</a>
Trips to Local Sporting Events	820	<a href="#">View</a>   <a href="#">Export</a>
Outdoor Adventures	775	<a href="#">View</a>   <a href="#">Export</a>
Pool Tournaments	290	<a href="#">View</a>   <a href="#">Export</a>
Fitness Classes (pilates, yoga, spinning)	710	<a href="#">View</a>   <a href="#">Export</a>
Dance Classes (hip-hop, break dancing, ballroom)	330	<a href="#">View</a>   <a href="#">Export</a>
Board Games	393	<a href="#">View</a>   <a href="#">Export</a>
Video Game Tournaments	346	<a href="#">View</a>   <a href="#">Export</a>
Karaoke Night	277	<a href="#">View</a>   <a href="#">Export</a>

# Connect Students With Resources and Each Other

A growing number of students arriving on campus choose to **regularly abstain from alcohol use**. Research has shown that these students are more likely to be successful in their commitment to not drink if they are able to connect with like-minded peers. *AlcoholEdu* provides campuses with a unique tool to identify and assist students with that process.



**SUPPORT FOR YOUR CHOICE**

Would you like to connect with other students on campus who have also decided not to drink?

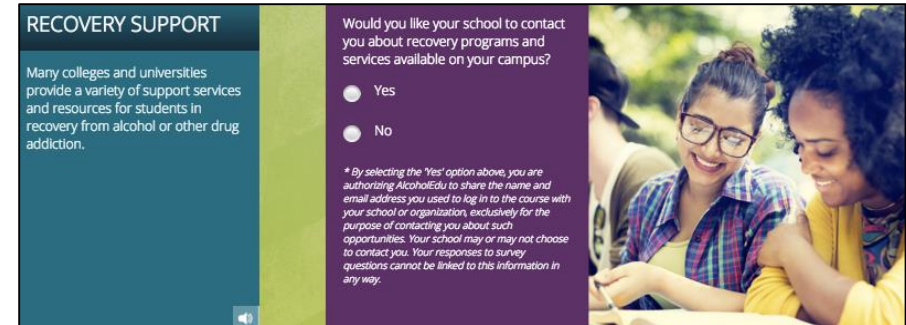
☐ Yes, I would like to be contacted by my school\* to learn more about connecting with other students who are interested in a social life that isn't focused around alcohol.

☐ No, thanks.

\*By selecting this option, you are authorizing AlcoholEdu to share the name and email address you used to log in to the course with your school or organization, exclusively for the purpose of contacting you about such opportunities.

Note: Students choose to abstain from alcohol use for a variety of reasons, from religious beliefs to recovery from alcohol or other drug addiction. Be sure to consider all possibilities when reaching out to students on your list.

*AlcoholEdu* also enables students to indicate their interest in learning more about a school's programs and services to **support recovery from alcohol or other drug addiction**. Whether seeking information for themselves, a friend, or a family member, students may opt in to be connected with available resources.



**RECOVERY SUPPORT**

Many colleges and universities provide a variety of support services and resources for students in recovery from alcohol or other drug addiction.

Would you like your school to contact you about recovery programs and services available on your campus?

☐ Yes

☐ No

\* By selecting the "Yes" option above, you are authorizing AlcoholEdu to share the name and email address you used to log in to the course with your school or organization, exclusively for the purpose of contacting you about such opportunities. Your school may or may not choose to contact you. Your responses to survey questions cannot be linked to this information in any way.

"...two of the most important sociodemographic and psychobehavioral variables that predict whether students abstain is their perception of friends' alcohol-related attitudes and having a close friend who abstains (Huang, et al., 2009)."

# Considerations for Your Prevention Strategy

## INSTITUTIONALIZATION

### RESOURCE ALLOCATION

- Funding source, consistency of funding, total FTE devoted to prevention

### ACCOUNTABILITY

- Active and engaged task force, goals for improving student health

### BROAD SENIOR-LEVEL SUPPORT

- Senior leadership publicly speaking to the issue, health and wellness part of strategic plan/mission statement

## CRITICAL PROCESSES

### DATA RELIANCE

- Types of data collected, use of data

### PLANNING

- Specific goals, strategic planning, sharing of data

### POLICY REVIEW

- Frequency of review process, consistency with state, local, and Federal laws, adherence to Federal regulations (EDGAR part 86)

## POLICY

### WRITTEN

- Breadth and depth

### ENFORCED

- Consistency, strictness, communication

### ADJUDICATION

- Adjudication: types of sanctions, consistency of process

## PROGRAMS

### UNIVERSAL

- Programs and strategies directed at an entire population; deters the onset of risky behavior

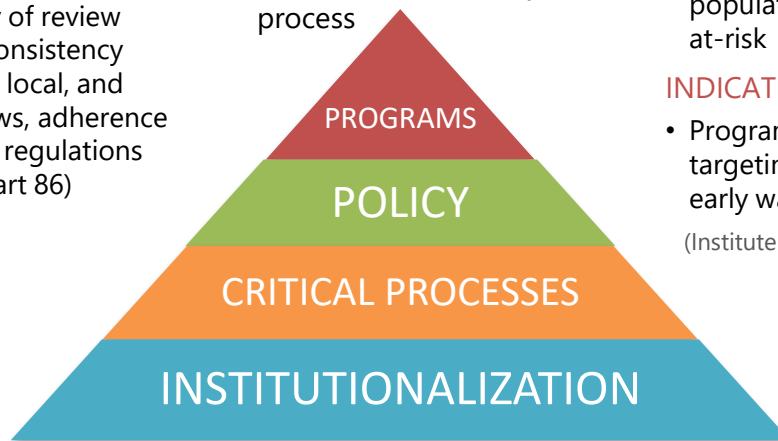
### SELECTIVE

- Programs and strategies targeting sub-sets of the population considered to be at-risk

### INDICATED

- Programs and strategies targeting individuals with early warning signs

(Institute of Medicine, 1994)



# Resources to Support Your Efforts



FOR ALL PARTNERS

## ***AlcoholEdu Partner Guide***

Designed to assist partners in creating programs and strategies that reinforce critical course content.

## **EverFi Analytics Platform (EAP)**

This new resource provides easily accessible, real time, campus-level data and reports for all EverFi courses. If you need assistance accessing the EAP, please contact your partner services director.

## **Thought Leadership**

Be sure to look out for e-mails regarding upcoming webinars, white papers and guidebooks to further support your Prevention and compliance initiatives.



# Contact Information

**For assistance with this report or other requests related to your partnership with EverFi, please contact your Partner Services director.**

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# Appendix

# AlcoholEdu for College Course Map

## PART ONE

### 1. Getting Started

- Introductory Video
- Custom Welcome Letter
- Custom Welcome Video

### 2. Standard Drink

- Student Alcohol Knowledge Interviews
- Pre-Assessment
- Standard Drink Definition
- Identifying Standard and Non-Standard Drinks
- Pouring Standard Drinks

## SURVEY 1

### 3. Where Do You Stand?

- Risk Factors & Choices
- You Are Not Alone/Benefits of Not Drinking/Calories & Cash/Support for Your Choice
- Your Drinking Profile/ Your Peak BAC/Reducing Your BAC/Drinking Consequences/Calories & Cash/Your Drinking Habits

### 4. Goal Setting

- What's Important to You?
- What Do You Want to Focus on this Year
- My Choices

### 5. Drinking & Motivation

- What Do You Think?
- Factors That Can Influence Decisions
- Why/Why Not Drink? Poll
- Expectancy Theory & Advertising
- Ads Appealing to Men/Women
- Alcohol & Advertising Poll
- Write a Tagline

### 6. Brain & Body

- BAC Basics
- What Factors Affect BAC
- Risk/Protective Factors
- BAC Calculator
- Marijuana & Drugs
- Sexual Assault & Understanding Consent
- Brain & Body Science
- Biphasic Effect
- A BAC Story

### 7. My Action Plan

- Drinker/Non-Drinker Plan
- Choose Your Strategies
- Activities on Campus

### 8. Laws & Policies

- Alcohol Related Laws
- Campus Policies
- Drinking & Driving

### 9. Helping Friends

- Taking Care of Yourself & Others
- Alcohol Poisoning
- Helping Your Friends Poll
- Drinking & Driving
- Getting Help

## EXAM

## INTERSESSION

## PART TWO

### 10. Introduction

- Welcome Back

## SURVEY 3

### 11. Recognizing Problems

- Taking Care of Yourself & Others – The Roommate

### 12. Course Conclusion

- Summary of Key Topics
- Review Goals, Choices and Plan

# References

## Slide: Where Students Drink

EverFi analysis of data from *AlcoholEdu for College* national database, 2012.

## Slide: Student Reasons for Not Drinking

Huang, J-H, DeJong W, Schneider SK, & Towvim, LG. (2011). Endorsed reasons for not drinking alcohol: A comparison of college student drinkers and abstainers. *Journal of Behavioral Medicine*, 34, 64-73.

## Slide: High-Risk Drinking Behaviors

EverFi analysis of data from *AlcoholEdu for College* national survey database, 2012.

## Slide: The Role of Alcohol in Sexual Assault

Parkhill, M.R., & Abbey, A. (2008). Does alcohol contribute to the confluence model of sexual assault perpetration? *Journal of Social and Clinical Psychology*, 27:6, 529-554.

## Slide: The Importance of Behavioral Intentions

Ajzen, I. (1991). The theory of planned behavior. *Organizational Behavior and Human Decision Processes*, 50, 179-211.

## Slide: Connect Abstainers

Huang, J-H., DeJong, W., Towvim, L. G., & Schneider, S. K. (2009). Sociodemographic and psychobehavioral characteristics of US college students who abstain from alcohol. *Journal of American College Health*, 57, 395-410.

## Slide: Considerations for Your Prevention Strategy

In a 1994 report, the Institute of Medicine proposed a framework for classifying prevention based on Gordon's (1987) operational classification of disease prevention. The IOM model divides the continuum of services into three parts: prevention, treatment, and maintenance. The prevention category is divided into three classifications--*universal*, *selective*, and *indicated* prevention. For more information, visit <http://c.ymcdn.com/sites/www.myprevention.org/resource/collection/8cc9c598-ef77-4cdb-a2df-88ab150a4832/25EIOMModel.pdf>

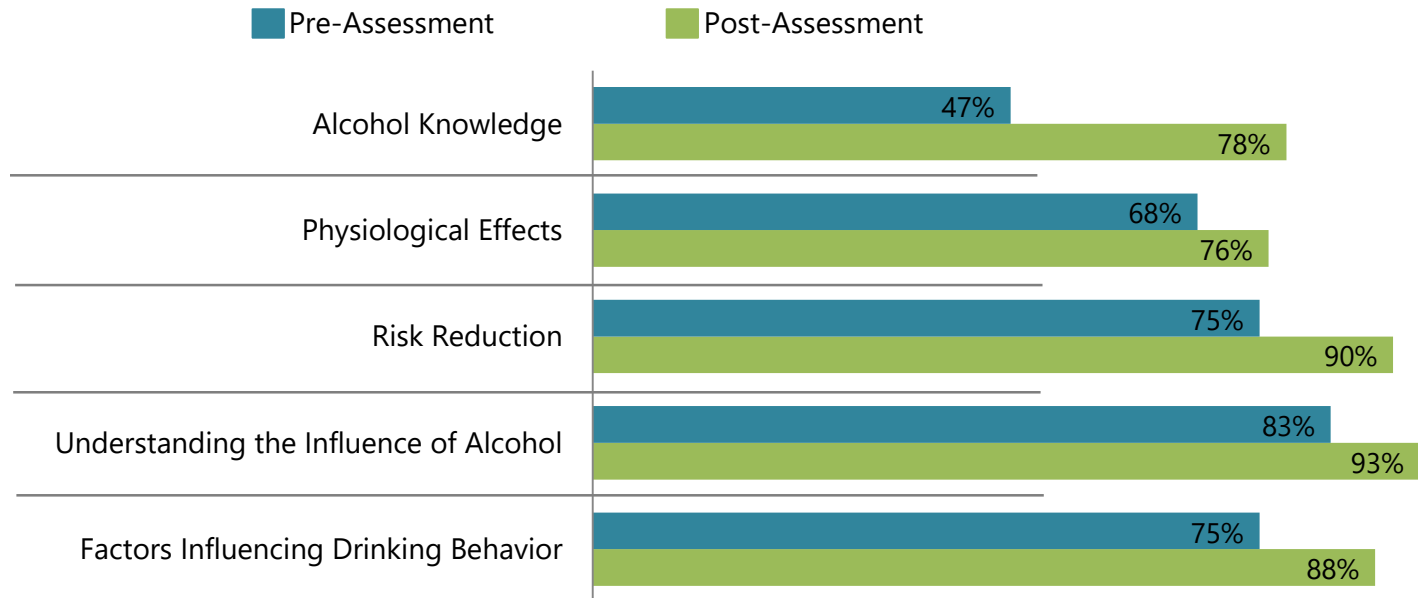
# National Data: Pre- and Post-Course Formative Assessment

OVERALL KNOWLEDGE  
CHANGE

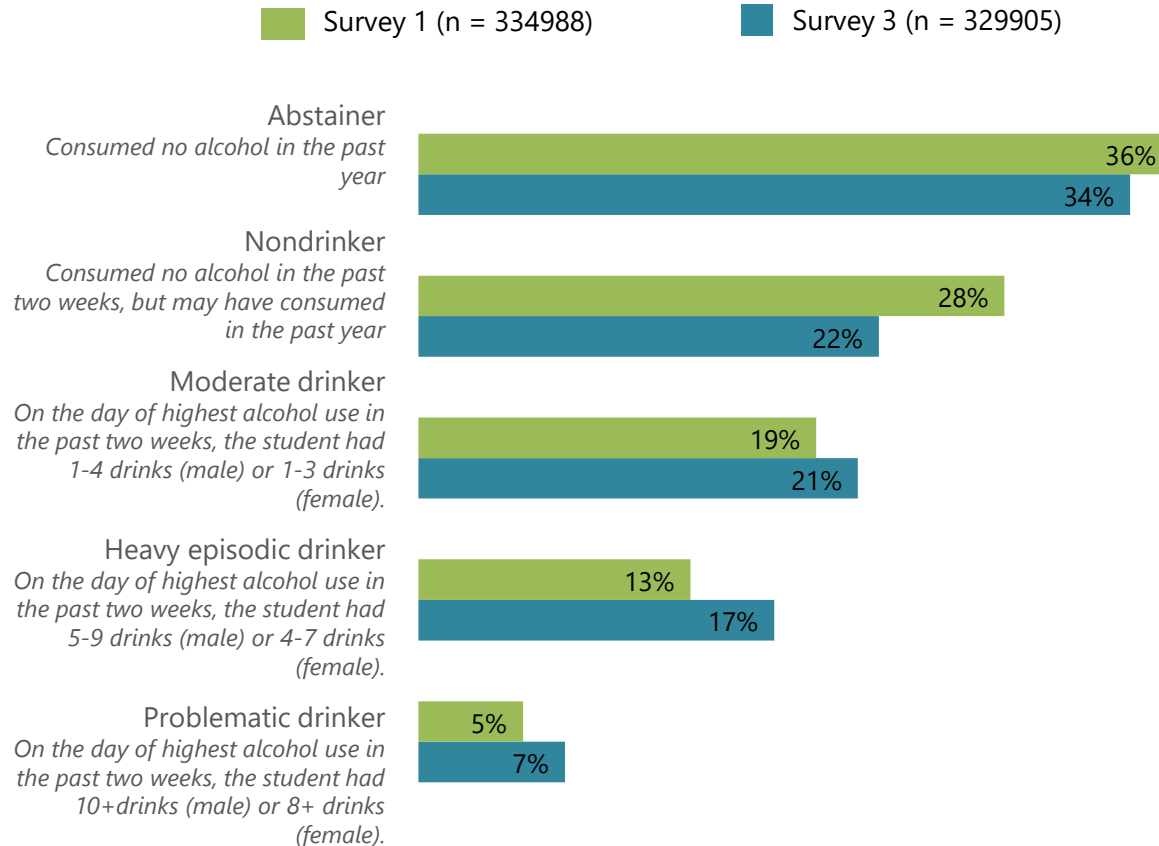
Pre-Assessment  
72%

Post-Assessment  
83%

Increase  
21%



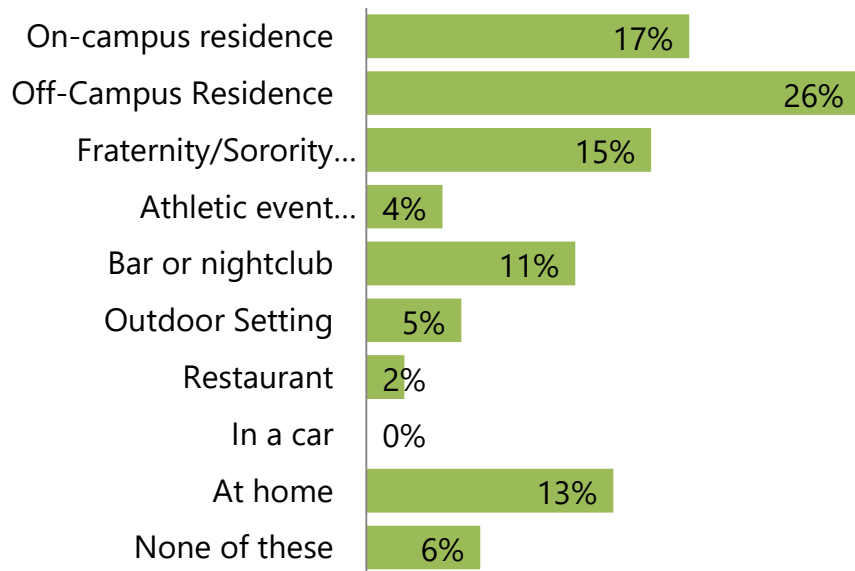
# National Data: Drinking Rates



Note: n sizes exclude those students who did not provide enough survey data to be categorized

# National Data: Drinking Location

The most common locations where students report consuming alcohol in the past two weeks (Survey 3, drinkers only, n = 155125):

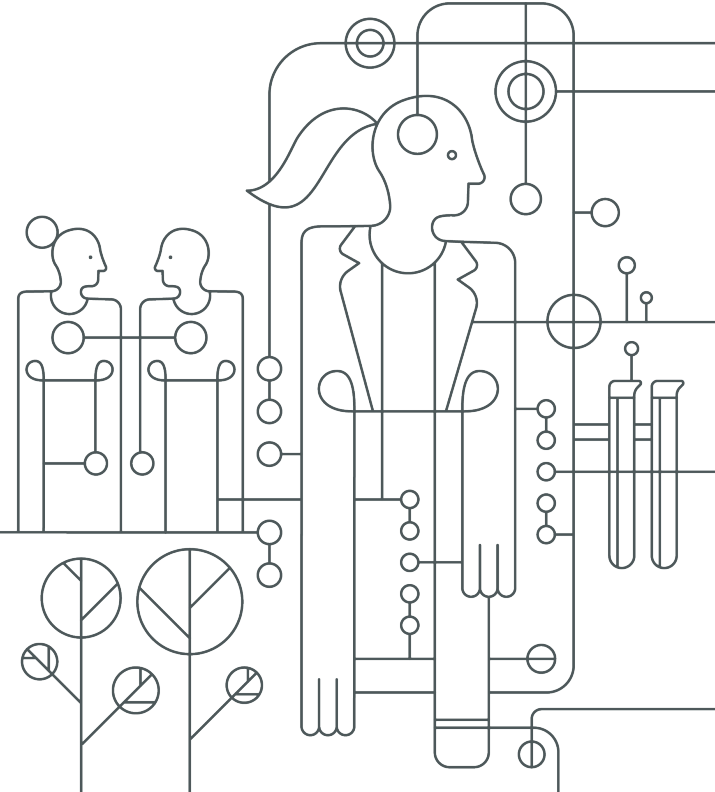




# AlcoholEdu for College

University of South Carolina - Columbia

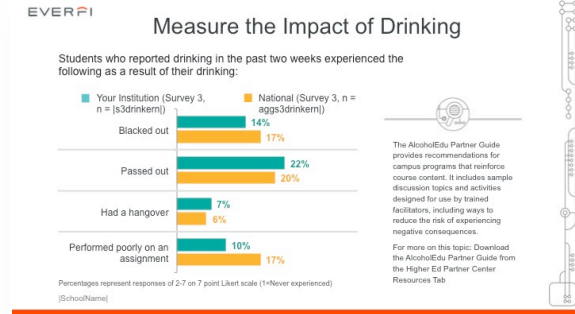
○ —————  
Impact Report 2017-2018



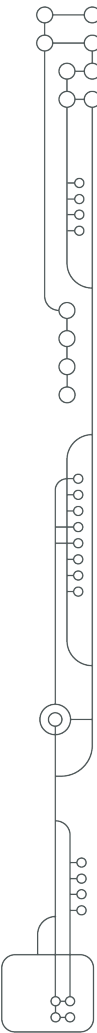
# Introduction

This report provides key insights from your *AlcoholEdu for College* data. We encourage you to share this report, or specific slides from this report, with others on your campus.

To help facilitate that process, we have included references to related studies or resources that offer important context for understanding the data provided. This information offers a framework for those who may not be familiar with EVERFI or the *AlcoholEdu for College* course structure, content, and data. It will assist you and your colleagues in utilizing your data to inform prevention efforts on your campus.



For deeper insights, the EVERFI Analytics platform provides real-time graphic representations of your EVERFI data. In addition to on-demand data, you also have the ability to download the raw data files for all *AlcoholEdu* surveys. If you added custom questions to the course survey, those data may be accessed on the platform as well.



# Your Impact Report Outline



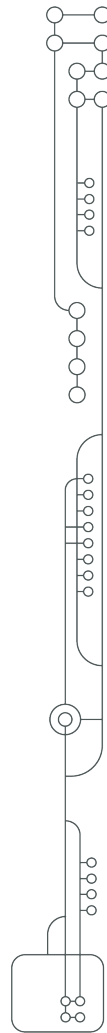
About EVERFI

About *AlcoholEdu for College*

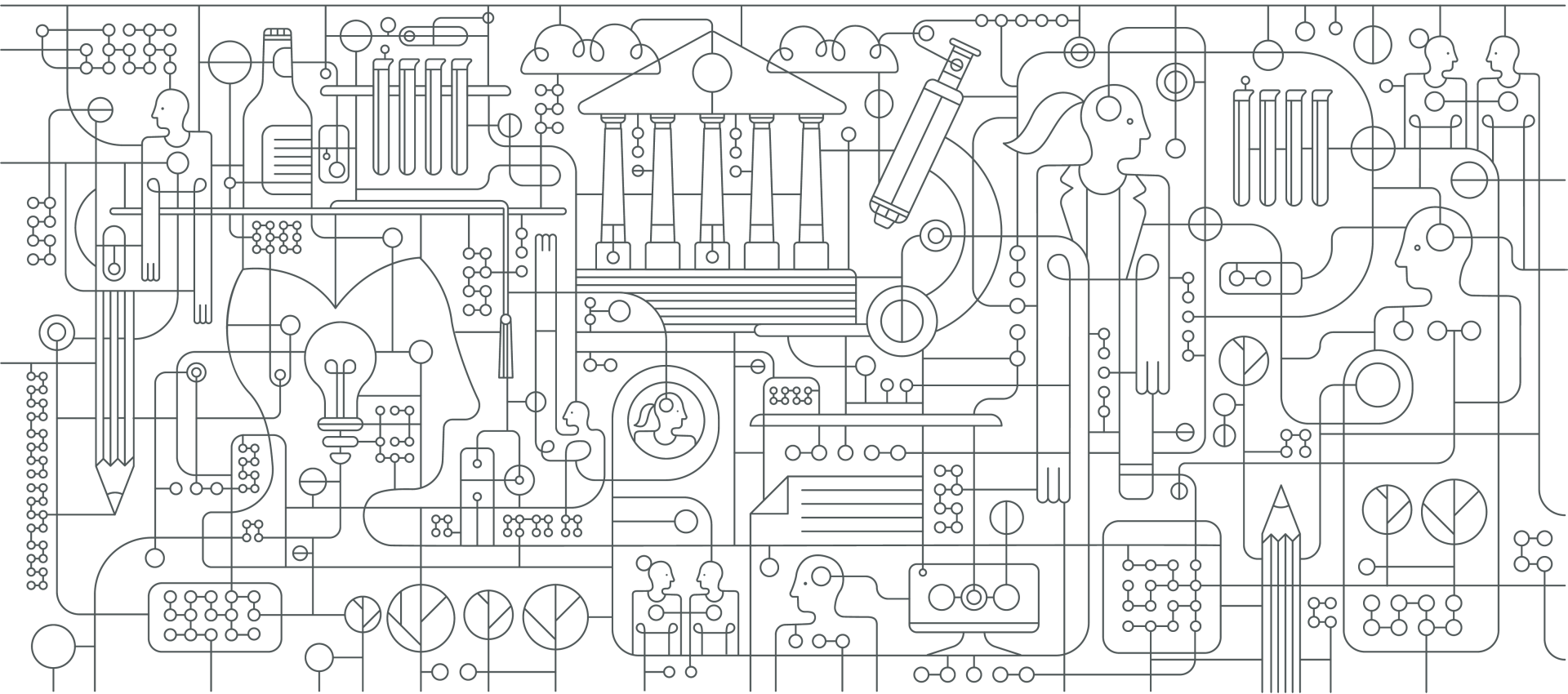
Your Students' Drinking Behavior

Next Steps

Appendix

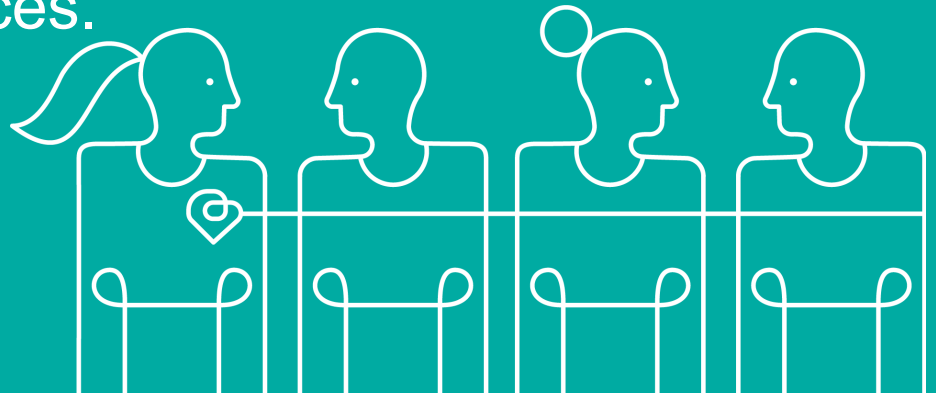


# About EVERFI



Our mission in higher education is to drive lasting, large-scale change on critical wellness issues facing students, faculty, and staff.

We help institutions make transformative impact on sexual assault, high-risk drinking, and financial education through evidence-based online programs, data, and advisory services.



**5 Million**

educated in the last year

**16+**

years of  
experience

**1,700+**

institutional  
partners

**30+**

Greek  
organizations

**Eight**

efficacy  
studies

## Sexual Assault

Prevention & Education

Fostering healthy relationships, awareness of resources and policies, and skill-building among students and employees

## Alcohol & Other Drug

Prevention & Education

Promoting healthy habits through adaptive learning, realistic scenarios and hands-on activities

## Fraternity & Sorority

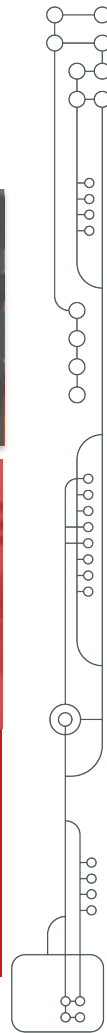
Values-Based Education

Helping fraternity & sorority members model leadership around alcohol, hazing & sexual assault

## Financial Wellness

Support & Education

Encouraging students to make smarter decisions about finances, student loans, financial aid and more



# The Benefits of Partnering With EVERFI



## Proven Efficacy

Eight independent studies have been published demonstrating the efficacy of EVERFI online programs. Our approach improves knowledge, attitudes, and behaviors.



## True Expertise

Our team includes public health professionals, administrators from student affairs, campus prevention offices, and more. Extend your team by partnering with ours.



GETTING  
STARTED

The purpose of AlcoholSense is to help you make healthy and safe decisions about alcohol while

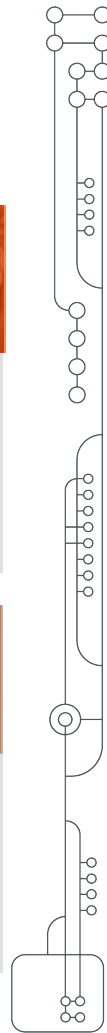
## Beyond Compliance

Our online programs are built by prevention and compliance experts to meet and exceed requirements from Title IX, Clery Act (Campus SaVE/VAWA), EDGAR part 86.



## Data-driven

Our data and analytics provide real-time access to attitudinal and behavioral data from your unique populations, and national benchmarks to assess needs and strengths.







# The *AlcoholEdu* for College Course

- Developed in collaboration with leading prevention experts and researchers
- Interactive content guided by recommendations from the National Institute of Alcohol Abuse and Alcoholism (NIAAA)
- Informed by emerging research on evidence-based practice (e.g., social norms approach, bystander intervention)
- Cited as a top-tier strategy by NIAAA in their CollegeAIM Matrix
- Most widely used universal online AOD prevention program since its development in 2000



# Course Structure and Resulting Data Set

## Part 1: Primary Course Content

30+  
days\*

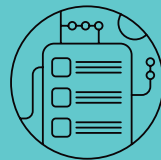
## Part 2: Review



**Survey 1**  
Pre-assessment

### Course Lessons

9 learning modules focused  
on strategic decision-making  
through real life examples



**Survey 2**  
Post-assessment

Interession



**Survey 3**  
Follow-up Lessons

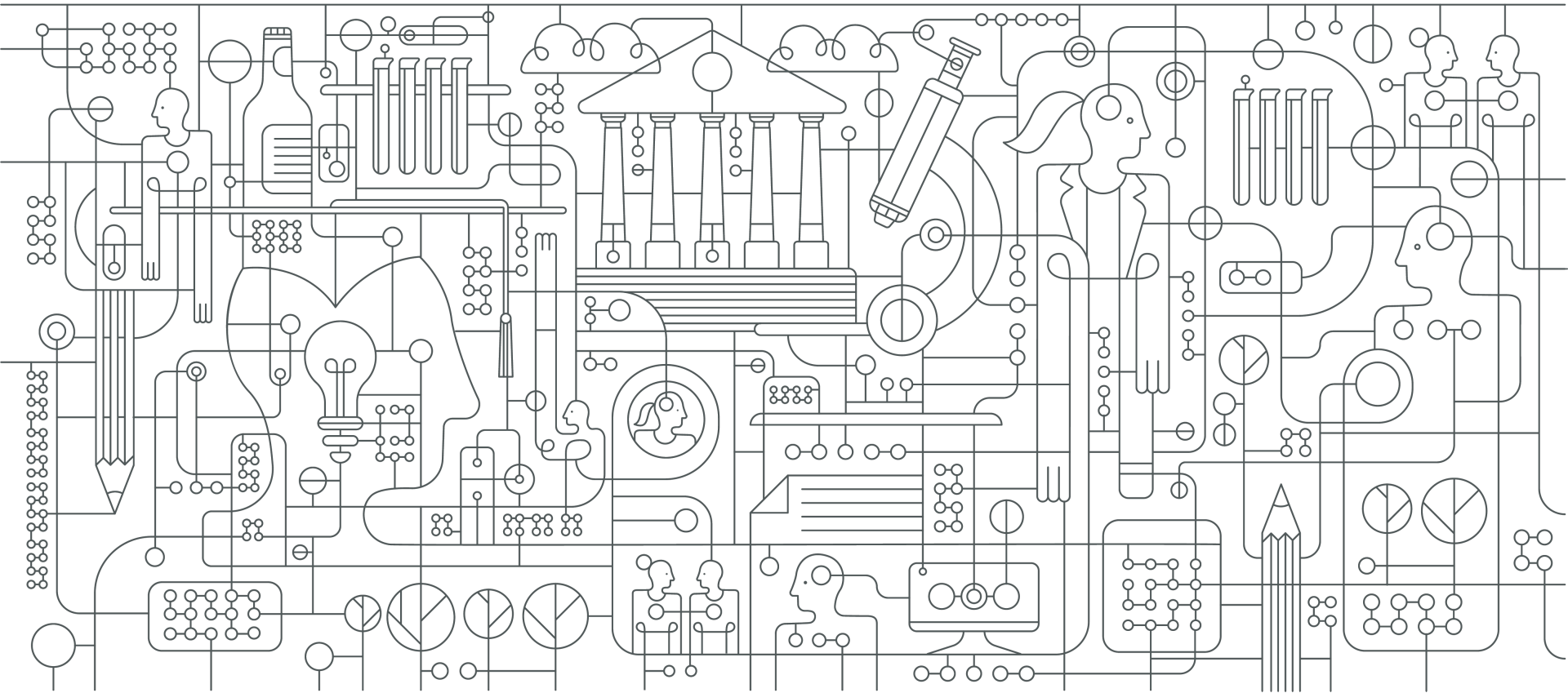
\*Length of interession is determined by individual schools.

**Surveys** measure changes in attitudes and behaviors

**Assessments** are tests and quizzes that measure student knowledge

Data in this report are based on responses from **6201** students at your Institution who completed all 3 *AlcoholEdu for College* surveys in the fall of 2017. Where available, data is benchmarked against the national aggregate (N= 371569).

# A Profile of Your Students' Drinking Behavior



# Highlights from Your Data

36%

of your students reported **drinking in a high risk way**, when measured midway through the fall term (Survey 3, n=6201).

18%

of your students reported **not drinking in the past two weeks**, with 25% indicating **not drinking in the past year**. (Survey 3, n=6201)

89%

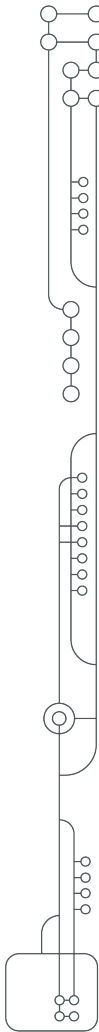
of your students, after completing *AlcoholEdu for College* (Survey 2, n=6201), reported that the course prepared them to **make responsible decisions about drinking**.

The following are based on responses provided by your students in Survey 3 (n=6201):

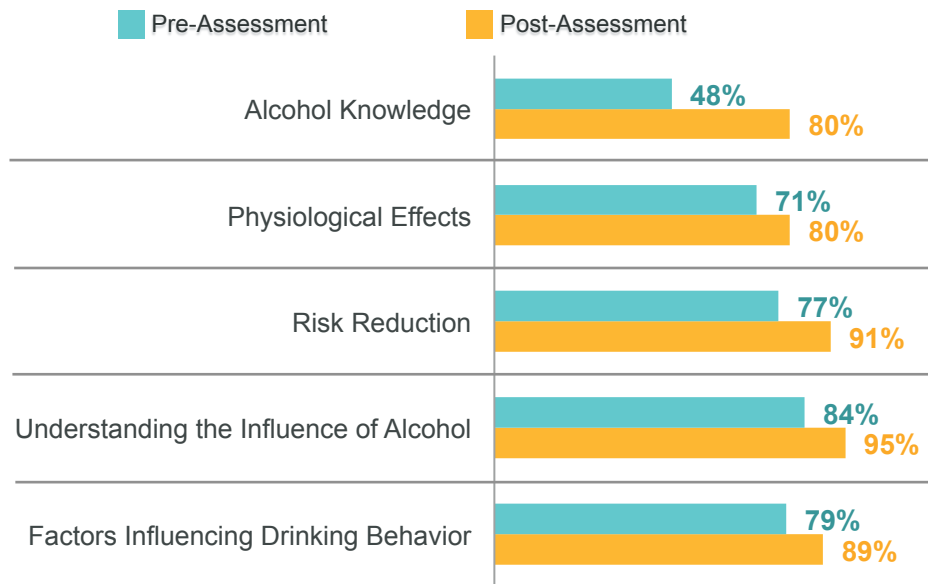
The most common drinking-related risk behaviors that your students engage in are **pregaming** and **doing shots**.

Two of the most frequently reported negative consequences of drinking are **hangovers** and **blacking out**.

Students reported that some of the most important reasons not to drink are because **I'm going to drive** and that **I don't want to spend the money**.



# Formative Assessments and Knowledge Gains



**Note:** National Pre- and Post-Assessment data is provided in the Appendix.  
Full assessment item text is available upon request.

## Your students reported that *AlcoholEdu for College*:

Prepared them to prevent an alcohol overdose

88%

Prepared them to help someone who may have alcohol poisoning

90%

Helped them establish a plan ahead of time to make responsible decisions about drinking

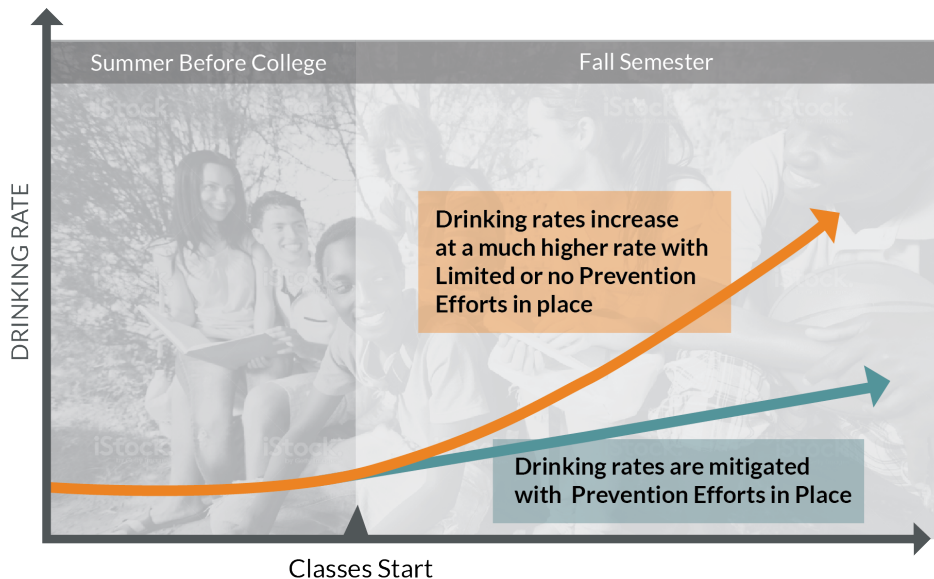
89%

Changed their perceptions of other's drinking behavior

63%

# Important Context for Reviewing Your Data: Understanding the “College Effect”

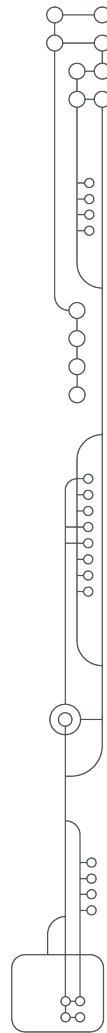
National student drinking rates follow a typical pattern: alcohol use generally rises the summer before a student enters college, and then increases substantially after their arrival on campus. This phenomenon, known as the “College Effect,” is represented by the conceptual graphic below.



## Mitigating The College Effect

There is a narrow window of opportunity for primary prevention. Through evidence-based education and prevention efforts, including *AlcoholEdu for College*, institutions can mitigate the impact of the “College Effect”.

Such efforts must consider the need to focus on all students, not just those who have a prior history of heavy or problematic drinking. Efforts aimed at reinforcing the behaviors of the healthy majority should not be overlooked.



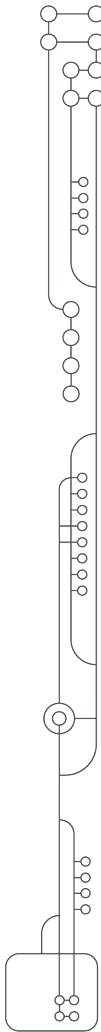
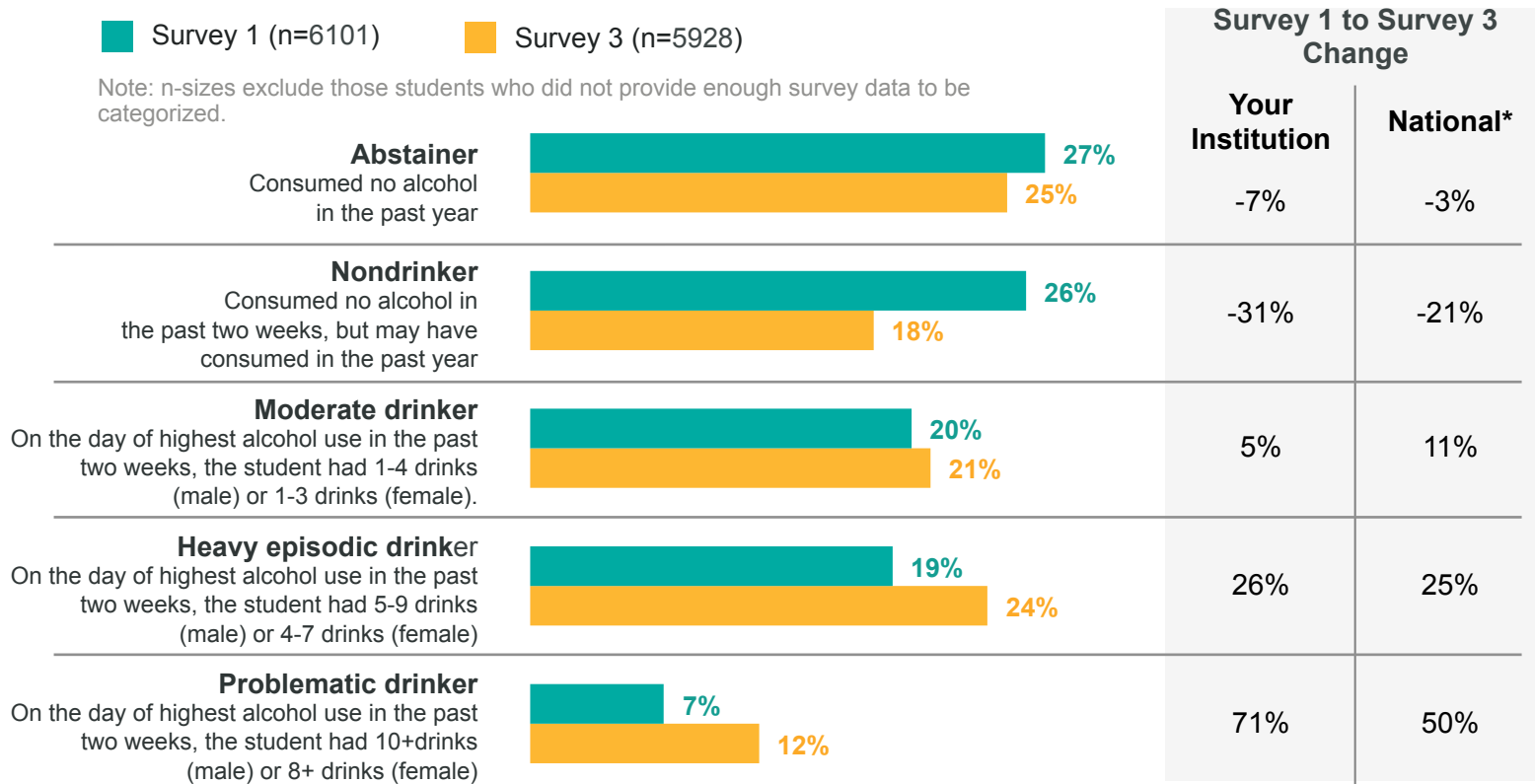


# Examining Changes in Drinking Rates

■ Survey 1 (n=6101)

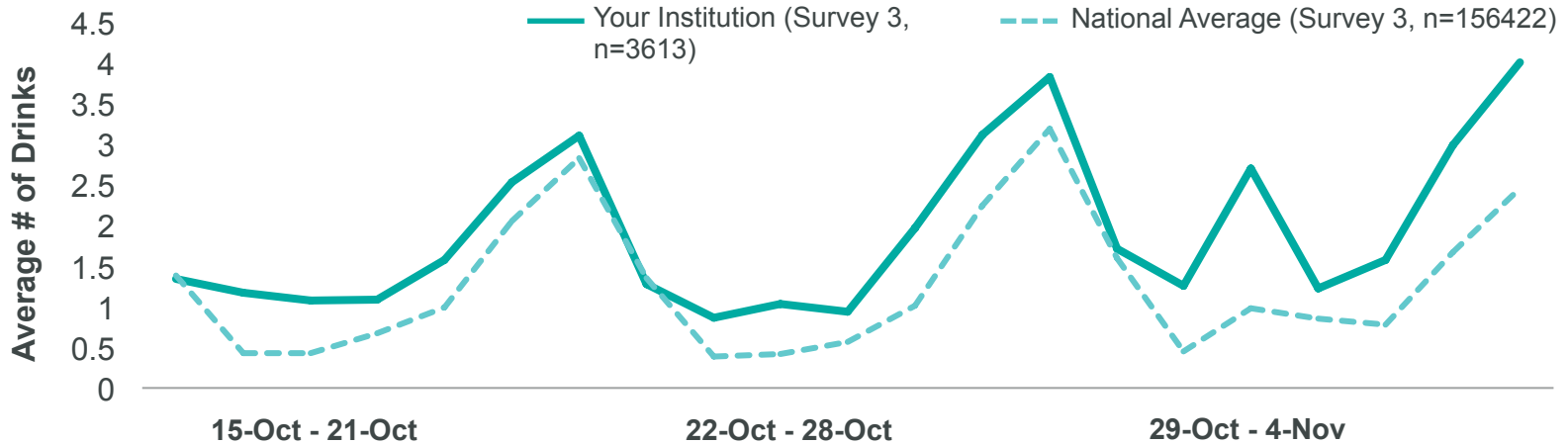
■ Survey 3 (n=5928)

Note: n-sizes exclude those students who did not provide enough survey data to be categorized.



# Peak Drinking Days

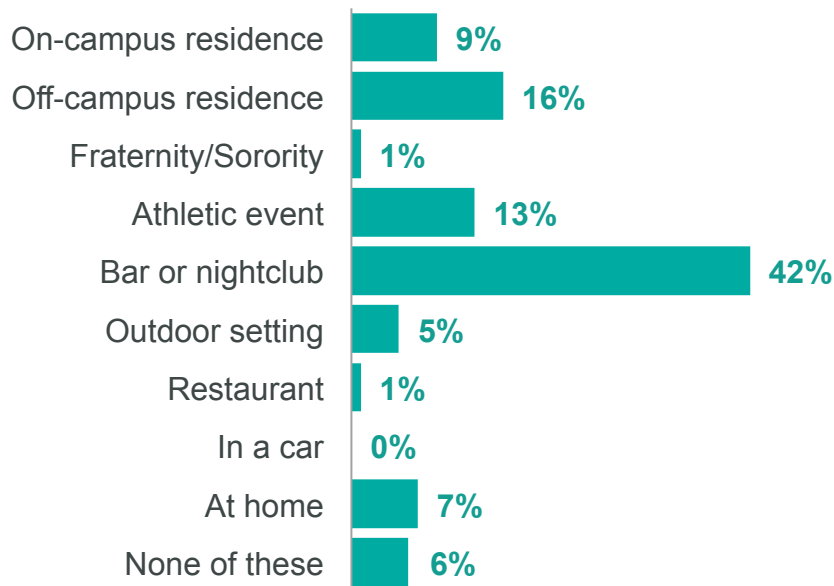
Below is a snapshot of student drinking rates over a 3-week period of time. It represents the average number of drinks consumed by your students (drinkers only) as compared to the national average during that same 3-week period.



**Note:** The date range for the above graph was selected as the peak drinking period for our national aggregate and may not represent the peak drinking days for your institution.

# Where Students Drink

The most common location where your students report consuming alcohol in the past two weeks (Survey 3, drinkers only, n = 3613):



Certain drinking locations – on campus pubs, off-campus house parties – have been shown to be associated with significant negative consequences (EVERFI, 2012).

The same study also indicated that certain locations (on-campus dances and concerts) have a greater relationship with sexual assault than other locations.

# Student Reasons for Not Drinking

Both drinkers and non-drinkers indicated their most important reasons for choosing whether or not to drink alcohol (Survey 3, n = 6201).

When you choose **NOT** to drink alcohol, how important are the following reasons:

Percentage Important/  
Very Important\*

I'm going to drive	71%
I don't want to spend the money	55%
I have other things to do	51%
I don't have to drink to have a good time	45%
I don't want to lose control	44%



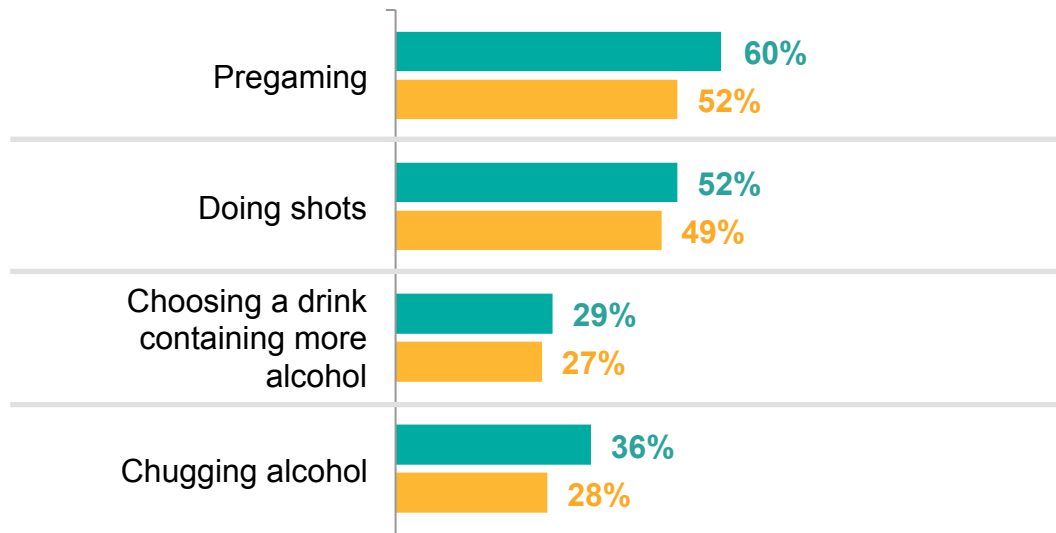
“It would be far easier to increase the salience of existing reasons that drinkers have for restricting their alcohol use than to win their endorsement of still additional reasons that are primarily endorsed by abstainers (Huang et al., 2011).”

\*Percentages represent responses of 5-7 on 7 point Likert scale (1=Not at all important, 7=Very important)

# High-Risk Drinking Behaviors

These are some of the most common risk-related drinking behaviors reported by your students who had a drink in the past two weeks:

■ Your Institution (Survey 3, n = 3613) ■ National (Survey 3, n = 156422)



More than other high-risk behaviors, pregameing has been shown to have a predictive relationship with a variety of negative outcomes (EVERFI, 2012).

As such, pregameing can potentially be used as a marker to identify students who are more likely to be at risk for negative consequences.

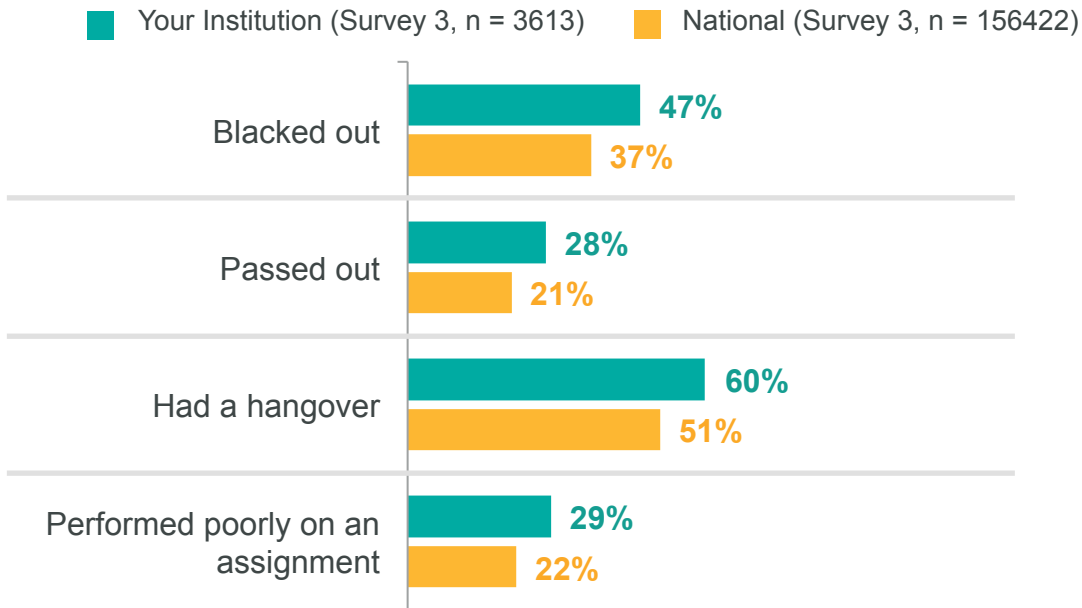
For more on this topic, see: Strategic Drinking – Examining the Culture of Pregameing (Webinar recording)

Percentages represent responses of 5-7 on 7 point Likert scale (1=Never)

University of South Carolina - Columbia

# Measure the Impact of Drinking

Students who reported drinking in the past two weeks experienced the following as a result of their drinking:



Percentages represent responses of 2-7 on 7 point Likert scale (1=Never experienced)

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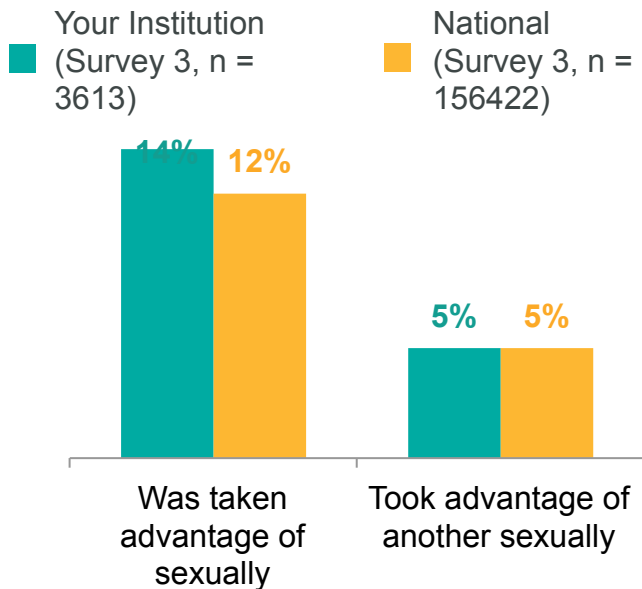


The AlcoholEdu Partner Guide provides recommendations for campus programs that reinforce course content. It includes sample discussion topics and activities designed for use by trained facilitators, including ways to reduce the risk of experiencing negative consequences.

For more on this topic: Download the AlcoholEdu Partner Guide from the Higher Ed Partner Center Resources Tab

# The Role of Sexual Assault

Students who drank in the past two weeks reported that the following occurred in conjunction with their drinking:



Percentages represent responses of 2-7 on 7-point Likert scale (1=Never experienced)

“The fact that alcohol consumption and sexual assault frequently co-occur does not demonstrate that alcohol causes sexual assault.”

(ABBEY, 2008)

## Insights from *Haven: Understanding Sexual Assault*

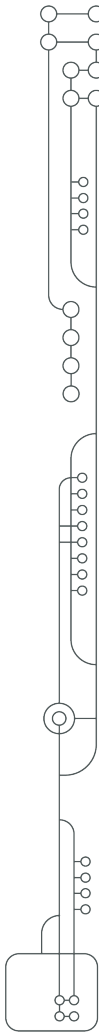
Students with **unhealthy attitudes** regarding sexual violence:

- are much more likely to perpetrate sexual assault
- have higher rates of alcohol use (frequency and quantity)
- are much more likely to experience alcohol-related problems



How do we effectively identify and intervene with students at risk for being victimized or perpetrating sexual assault?

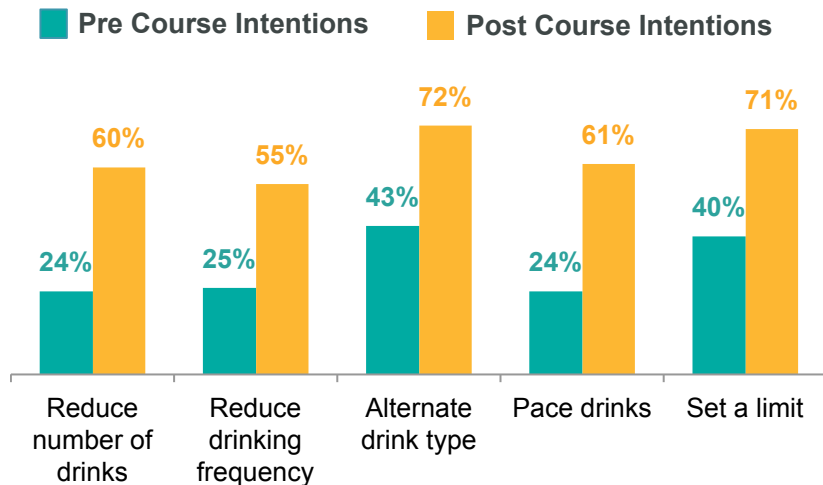
For more on this topic, see: *Alcohol and Sexual Assault – Unpacking the Connections and Implications for Practice* (Webinar recording)





# The Importance of Behavioral Intentions

After completing *AlcoholEdu for College*, students reported an increase in several positive behavioral intentions.



Data represents student responses collected in Survey 1 (Pre-course) and Survey 2 (Post-course).

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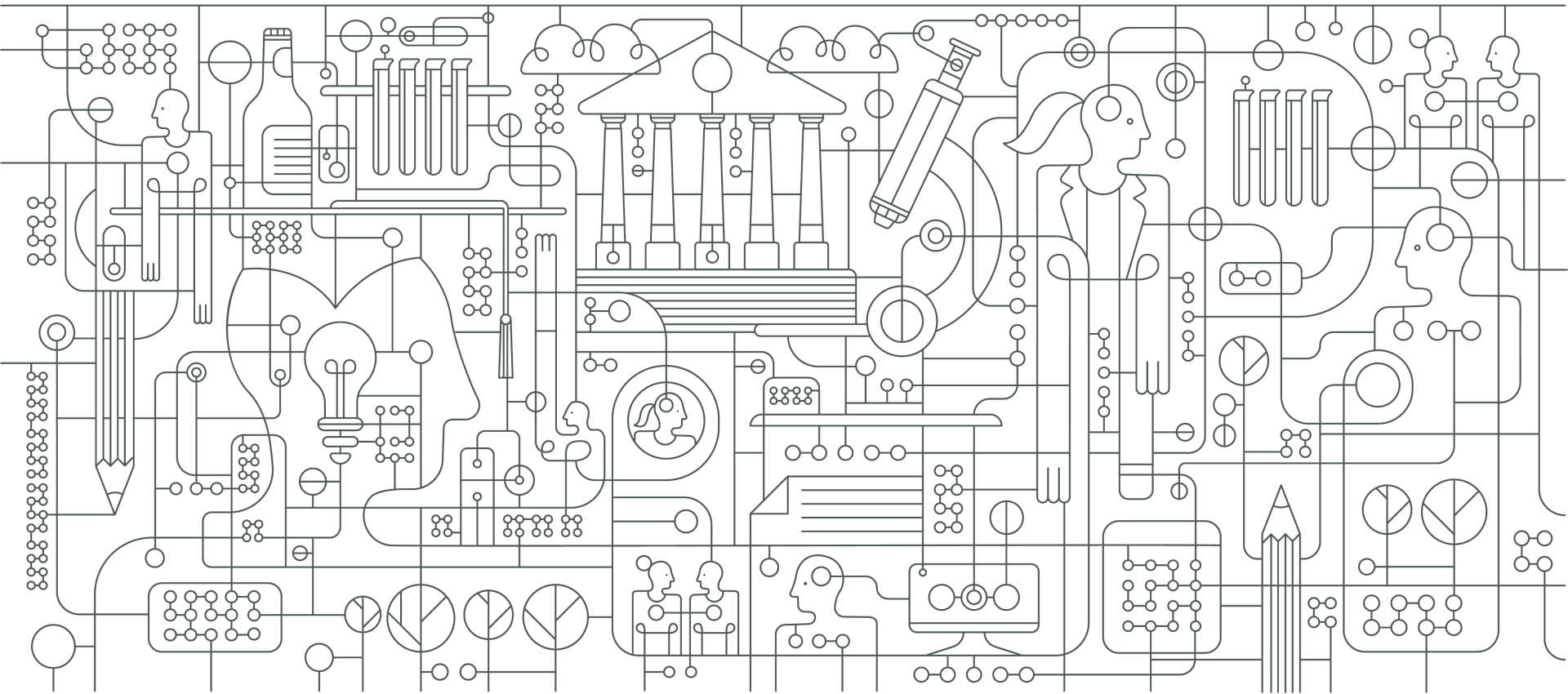
## Impact For High-risk Students:

Among the **74%** of high risk drinkers (**1628 students**) who saw **"no need to change the way they drink"** before taking *AlcoholEdu for College*, **57%** of those students (**936 students**) indicated their readiness to change after completing the course.



Intention has been shown to be the most important variable in predicting behavior change (Ajzen, 1991). Actual behavior change is driven, in part, by an individual's perception of the social environment surrounding the behavior (subjective norms). As such, a campus environment that reinforces safe and healthy norms can help support individual intentions and, ultimately, change in behavior.

# Next Steps

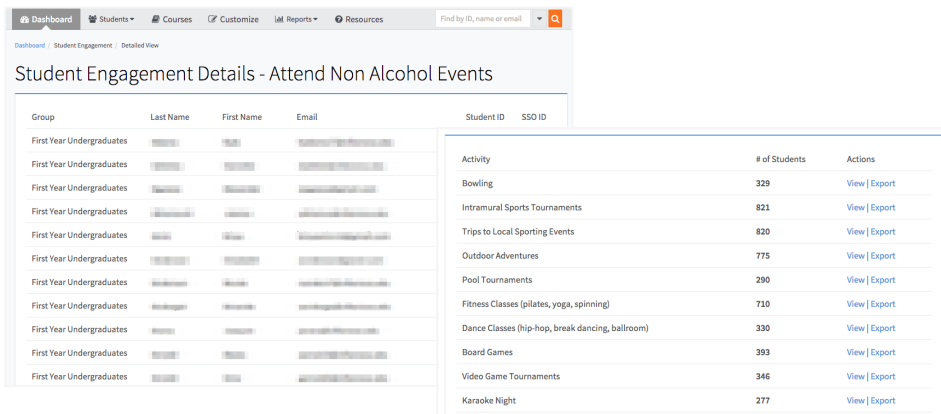


# Engage Your Students

Effective prevention includes actively engaging students to reinforce positive behavioral intentions of all students: drinkers and non-drinkers alike.

## Interest in Alcohol-Free Activities

Your students voluntarily provided their name and email address in order to be contacted regarding alcohol-free activities. Lists of students who want to attend such activities, along with the specific types of activities they are interested in, can be downloaded from the Higher Ed Partner Center.



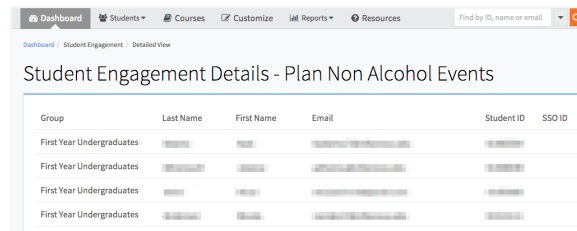
**Student Engagement Details - Attend Non Alcohol Events**

Group	Last Name	First Name	Email	Student ID	SSO ID
First Year Undergraduates	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
First Year Undergraduates	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
First Year Undergraduates	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
First Year Undergraduates	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
First Year Undergraduates	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
First Year Undergraduates	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
First Year Undergraduates	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
First Year Undergraduates	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
First Year Undergraduates	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
First Year Undergraduates	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

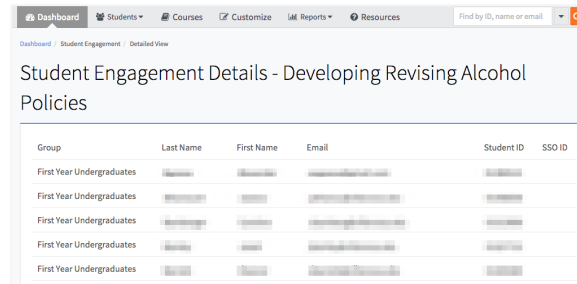
Activity	# of Students	Actions
Bowling	329	<a href="#">View</a>   <a href="#">Export</a>
Intramural Sports Tournaments	821	<a href="#">View</a>   <a href="#">Export</a>
Trips to Local Sporting Events	820	<a href="#">View</a>   <a href="#">Export</a>
Outdoor Adventures	775	<a href="#">View</a>   <a href="#">Export</a>
Pool Tournaments	290	<a href="#">View</a>   <a href="#">Export</a>
Fitness Classes (pilates, yoga, spinning)	710	<a href="#">View</a>   <a href="#">Export</a>
Dance Classes (hip-hop, break dancing, ballroom)	330	<a href="#">View</a>   <a href="#">Export</a>
Board Games	393	<a href="#">View</a>   <a href="#">Export</a>
Video Game Tournaments	346	<a href="#">View</a>   <a href="#">Export</a>
Karaoke Night	277	<a href="#">View</a>   <a href="#">Export</a>

## Additional Engagement Opportunities



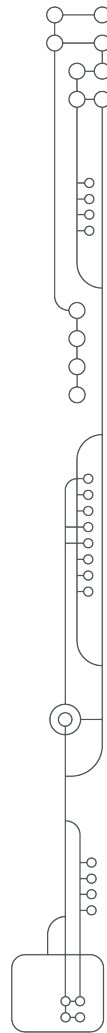
**Student Engagement Details - Plan Non Alcohol Events**

Group	Last Name	First Name	Email	Student ID	SSO ID
First Year Undergraduates	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
First Year Undergraduates	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
First Year Undergraduates	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
First Year Undergraduates	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]



**Student Engagement Details - Developing Revising Alcohol Policies**

Group	Last Name	First Name	Email	Student ID	SSO ID
First Year Undergraduates	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
First Year Undergraduates	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
First Year Undergraduates	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
First Year Undergraduates	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
First Year Undergraduates	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]



# Connect Students with Resources and Each Other

A growing number of students arriving on campus choose to **regularly abstain from alcohol use**. Research has shown that these students are more likely to be successful in their commitment to not drink if they are able to connect with like-minded peers. *AlcoholEdu for College* provides campuses with a unique tool to identify and assist students with that process.

**SUPPORT FOR YOUR CHOICE**

Would you like to connect with other students on campus who have also decided not to drink?

☐ Yes, I would like to be contacted by my school\* to learn more about connecting with other students who are interested in a social life that isn't focused around alcohol.

☐ No, thanks.

\*By selecting this option, you are authorizing AlcoholEdu to share the name and email address you used to log in to the course with your school or organization, exclusively for the purpose of contacting you about such opportunities.

Note: Students choose to abstain from alcohol use for a variety of reasons, from religious beliefs to recovery from alcohol or other drug addiction. Be sure to consider all possibilities when reaching out to students on your list.

*AlcoholEdu for College* also enables students to indicate their interest in learning more about a school's programs and services to **support recovery from alcohol or other drug addiction**. Whether seeking information for themselves, a friend, or a family member, students may opt in to be connected with available resources.

**RECOVERY SUPPORT**

Many colleges and universities provide a variety of support services and resources for students in recovery from alcohol or other drug addiction.

Would you like your school to contact you about recovery programs and services available on your campus?

☐ Yes

☐ No

\* By selecting the 'Yes' option above, you are authorizing AlcoholEdu to share the name and email address you used to log in to the course with your school or organization, exclusively for the purpose of contacting you about such opportunities. Your school may or may not choose to contact you. Your responses to survey questions cannot be linked to this information in any way.



“...two of the most important sociodemographic and psychobehavioral variables that predict whether students abstain is their perception of friends' alcohol-related attitudes and having a close friend who abstains (Huang, et al., 2009).”

# Considerations for Your Prevention Strategy

## Institutionalization

### Resource Allocation

- Funding source, consistency of funding, total FTE devoted to prevention

### Accountability

- Active and engaged task force, goals for improving student health

### Broad Senior-level Support

- Senior leadership publicly speaking to the issue, health and wellness part of strategic plan/mission statement

## Critical Processes

### Data Reliance

- Types of data collected, use of data

### Planning

- Specific goals, strategic planning, sharing of data

### Policy Review

- Frequency of review process, consistency with state, local, and Federal laws, adherence to Federal regulations (EDGAR part 86)

## Policy

### Written

- Breadth and depth

### Enforced

- Consistency, strictness, communication

### Adjudication

- Adjudication: types of sanctions, consistency of process

## Programs

### Universal

- Programs and strategies directed at an entire population; deters the onset of risky behavior

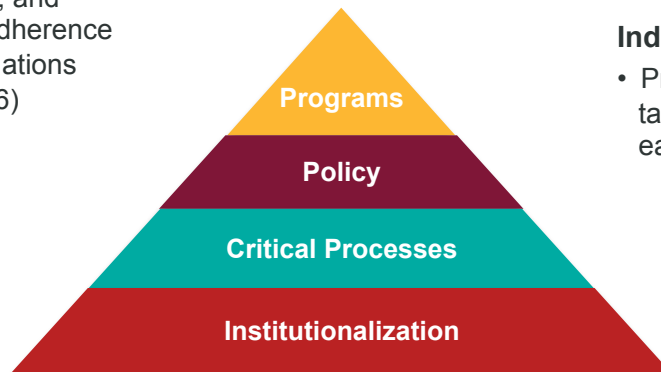
### Selective

- Programs and strategies targeting sub-sets of the population considered to be at-risk

### Indicated

- Programs and strategies targeting individuals with early warning signs

(Institute of Medicine, 1994)



# Resources to Support Your Efforts

## **AlcoholEdu Partner Guide**

Designed to assist partners in creating programs and strategies that reinforce critical course content.

## **EVERFI Analytics Platform (EAP)**

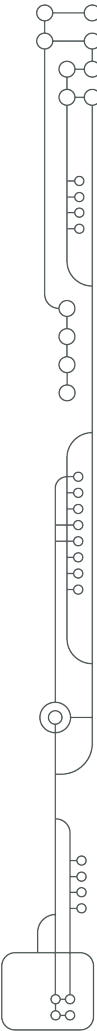
This resource provides easily accessible, real time, campus-level data and reports for all EVERFI courses. If you need assistance accessing the EAP, please contact your partner services director.

## **Campus Prevention Network (CPN)**

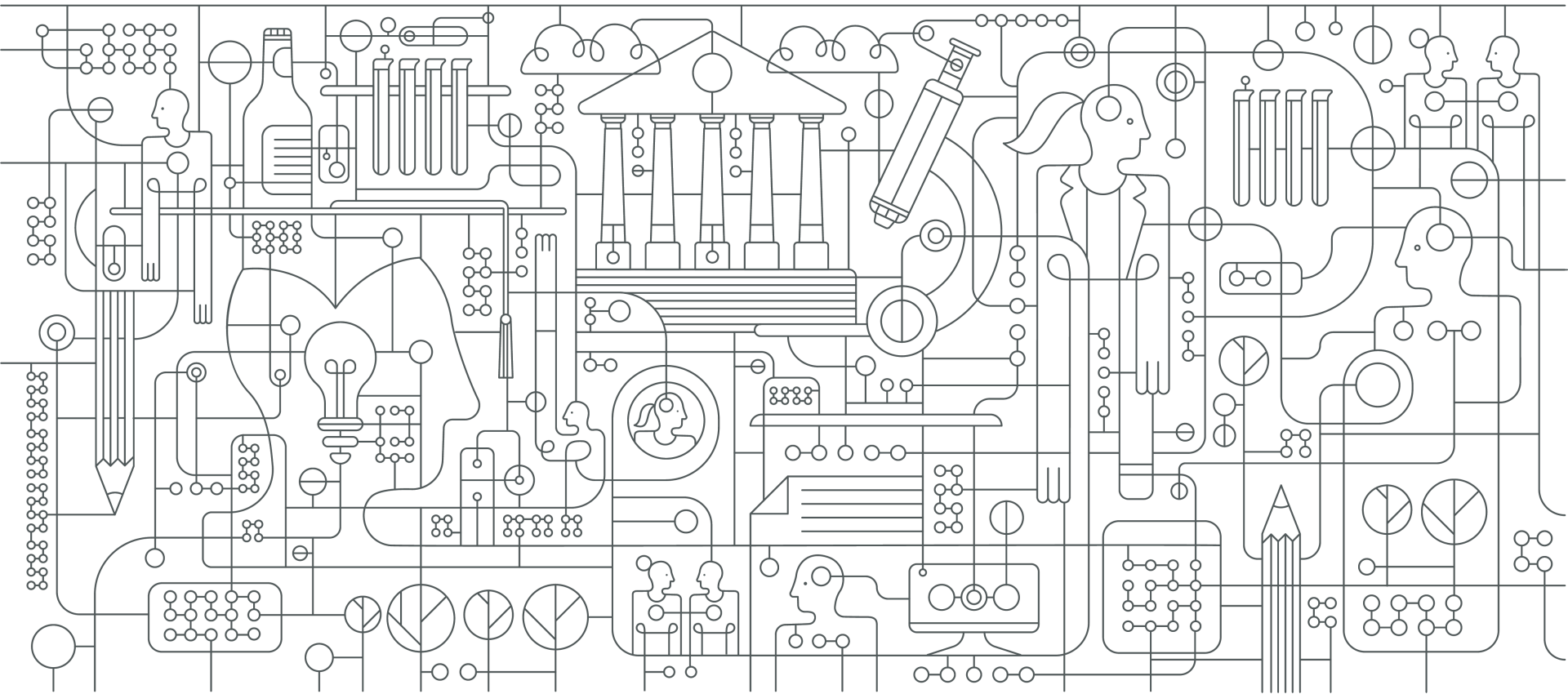
The CPN is uniquely positioned to help campuses make breakthrough progress on critical health and safety issues impacting the lives of your students, staff and faculty.

## **Thought Leadership**

Be sure to look out for e-mails regarding upcoming webinars, white papers and guidebooks to further support your efforts.



# Appendix



# AlcoholEdu for College Course Map

## PART ONE

### 1. Getting Started

- Introductory Video
- Custom Welcome Letter
- Custom Welcome Video

### 2. Standard Drink

- Student Alcohol Knowledge Interviews
- Pre-Assessment
- Standard Drink Definition
- Identifying Standard and Non-Standard Drinks
- Pouring Standard Drinks

## SURVEY 1

### 3. Where Do You Stand?

- Risk Factors & Choices
- You Are Not Alone/Benefits of Not Drinking/Calories & Cash/Support for Your Choice
- Your Drinking Profile/ Your Peak BAC/Reducing Your BAC/Drinking Consequences/Calories & Cash/Your Drinking Habits

### 4. Goal Setting

- What's Important to You?
- What Do You Want to Focus on this Year
- My Choices

### 5. Drinking & Motivation

- What Do You Think?
- Factors That Can Influence Decisions
- Why/Why Not Drink? Poll
- Expectancy Theory & Advertising
- Ads Appealing to Men/Women
- Alcohol & Advertising Poll
- Write a Tagline

### 6. Brain & Body

- BAC Basics
- What Factors Affect BAC
- Risk/Protective Factors
- BAC Calculator
- Marijuana & Drugs
- Sexual Assault & Understanding Consent
- Brain & Body Science
- Biphasic Effect
- A BAC Story

### 7. My Action Plan

- Drinker/Non-Drinker Plan
- Choose Your Strategies
- Activities on Campus

### 8. Laws & Policies

- Alcohol Related Laws
- Campus Policies
- Drinking & Driving

### 9. Helping Friends

- Taking Care of Yourself & Others
- Alcohol Poisoning
- Helping Your Friends Poll
- Drinking & Driving
- Getting Help

## EXAM

## INTERSESSION

## PART TWO

### 10. Introduction

- Welcome Back

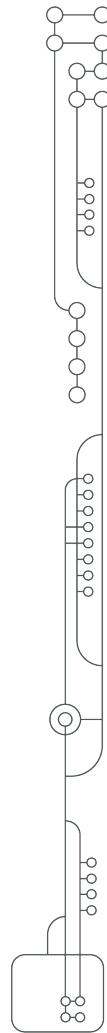
## SURVEY 3

### 11. Recognizing Problems

- Taking Care of Yourself & Others – The Roommate

### 12. Course Conclusion

- Summary of Key Topics
- Review Goals, Choices and Plan





# References

**Slide: Where Students Drink**

EVERFI analysis of data from *AlcoholEdu for College* national database, 2012.

**Slide: Student Reasons for Not Drinking**

Huang, J-H, DeJong W, Schneider SK, & Towvim, LG. (2011). Endorsed reasons for not drinking alcohol: A comparison of college student drinkers and abstainers. *Journal of Behavioral Medicine*, 34, 64-73.

**Slide: High-Risk Drinking Behaviors**

EVERFI analysis of data from *AlcoholEdu for College* national survey database, 2012.

**Slide: The Role of Alcohol in Sexual Assault**

Parkhill, M.R., & Abbey, A. (2008). Does alcohol contribute to the confluence model of sexual assault perpetration? *Journal of Social and Clinical Psychology*, 27:6, 529-554.

**Slide: The Importance of Behavioral Intentions**

Ajzen, I. (1991). The theory of planned behavior. *Organizational Behavior and Human Decision Processes*, 50, 179-211.

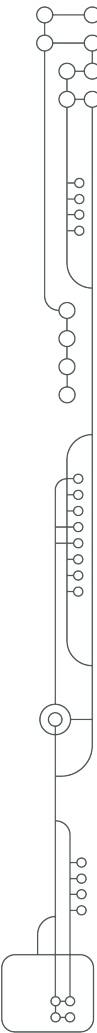
**Slide: Connect Abstainers**

Huang, J-H., DeJong, W., Towvim, L. G., & Schneider, S. K. (2009). Sociodemographic and psychobehavioral characteristics of US college students who abstain from alcohol. *Journal of American College Health*, 57, 395-410.

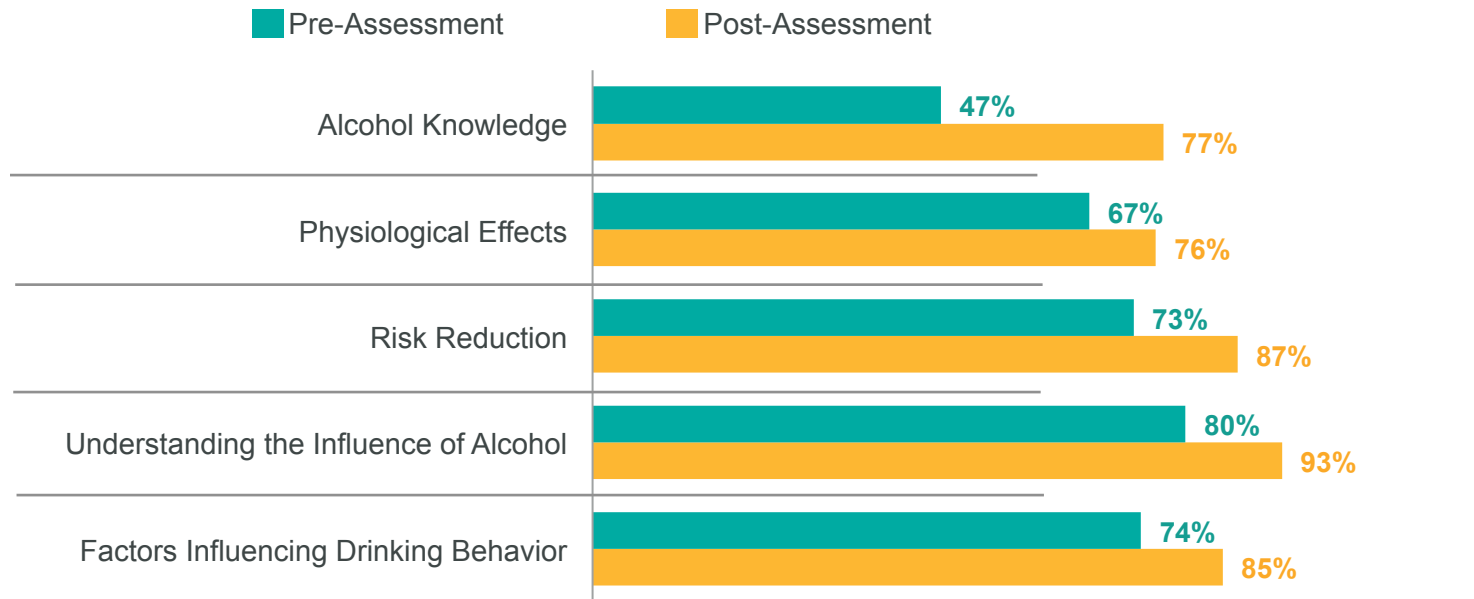
**Slide: Considerations for Your Prevention Strategy**

In a 1994 report, the Institute of Medicine proposed a framework for classifying prevention based on Gordon's (1987) operational classification of disease prevention. The IOM model divides the continuum of services into three parts: prevention, treatment, and maintenance. The prevention category is divided into three classifications--*universal*, *selective*, and *indicated* prevention. For more information, visit

<http://c.ymcdn.com/sites/www.myprevention.org/resource/collection/8cc9c598-ef77-4cdb-a2df-88ab150a4832/25EIOMModel.pdf>



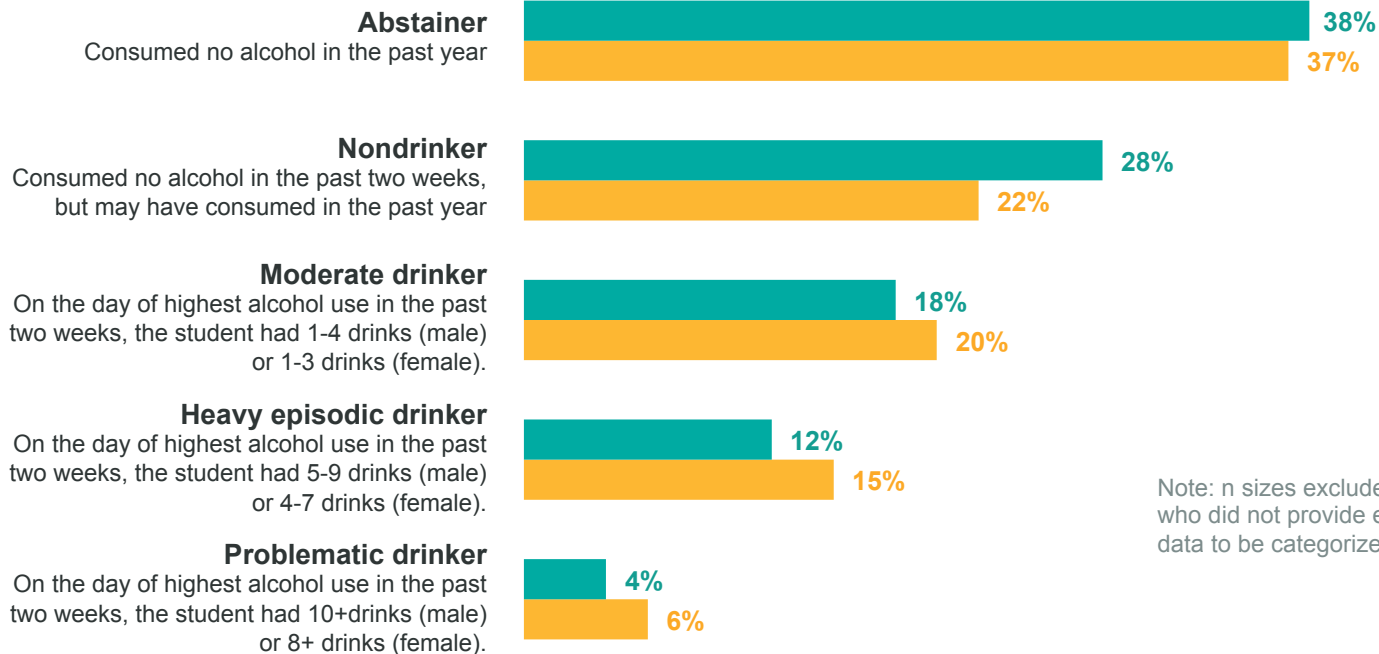
# National Data: Pre and Post Course Formative Assessment



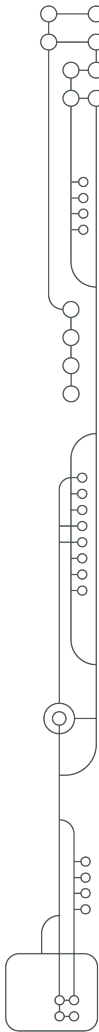
# National Data: Drinking Rates

■ Survey 1 (n = 363671)

■ Survey 3 (n = 358470)

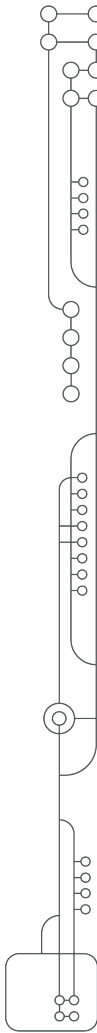
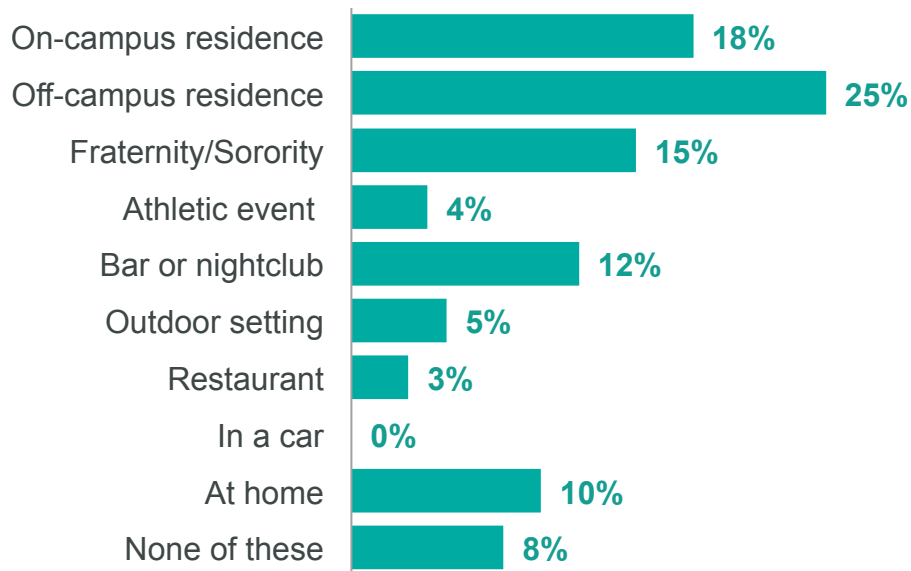


Note: n sizes exclude those students who did not provide enough survey data to be categorized



# National Data: Drinking Location

The most common locations where students report consuming alcohol in the past two weeks (Survey 3, drinkers only, n = 156422):



**Appendix G:**

**Social Compact Report**

**Final Report**  
**Social Compact Committee**  
**03-28-16**

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## **Social Compact Committee Members**

### **Sponsor**

Dennis Pruitt, Vice President for Student Affairs, Vice Provost and Dean of Students

### **Social Compact Chair**

Sandra Kelly, Carolina Trustee Professor of Psychology, Associate Dean of the South Carolina Honors College

### **Alcohol and Other Drugs Subcommittee**

#### *Co-chairs:*

Rhonda Dinovo, Assistant Professor of Social Work

Anna Edwards, Director of Student Services

#### *Committee Members:*

Andy Gillentine, Associate Dean and Professor in the College of Hospitality, Retail and Sport Management

David Reisman, Professor of Biology and Director of the Center for Colon Cancer Research

Erica Nelson (representing Ray Tanner, Athletic Director)

Ben Hutto, Greek Life Representative

### **Campus Sexual Assault Subcommittee**

#### *Co-chairs:*

Stephanie Mitchem, Professor of Religious Studies

Suzanne Swan, Associate Professor of Psychology and Gender Studies

#### *Committee Members:*

Patrick Hickey, Clinical Associate Professor of Nursing and Faculty Principle of the Capstone Scholars Program

Shannon Nix , Associate Director, Sexual Assault and Violence Intervention & Prevention

Sarah Nevarez, Adult Education Coordinator, Sexual Trauma Services of the Midlands

Morgan Lewis, President, National Association for the Advancement of Colored People (NAACP)

Ross Abbott, Chief Justice, Student Government

Tim Bryson, Greek Life Representative

Evan Katz, President, Orientation Leaders Association

### **Harassment and Discrimination Subcommittee**

#### *Co-chairs:*

Todd Shaw, Associate Professor of Political Science and African American Studies

Shay Malone, Director of Multicultural Student Affairs

*Committee Members:*

Helen Doerpinghaus, Deputy Provost  
Ed Walton, Senior, Vice President for Administration and Chief Operating Officer  
Terry Parham, General Counsel and Executive Director of Compliance Programs  
Jonathan Kaufman, President, Student Government  
Logan Hood, Individuals Respecting Identities and Sexualities (IRIS)  
Litsa Darby, Athlete-Student, Athletic Advisory Committee  
Hannah Westfall, Greek Life Representative

**Hazing Subcommittee**

*Co-chairs:*

Augie Grant, J. Rion McKissick Professor of Journalism and Chair, Faculty Senate  
Jerry Hilbish, Professor of Biology and Director of Graduate Studies

*Committee Members:*

Doug Smith, Assistant Professor of Education Leadership and Policies, Fraternity Advisor  
Jerry Brewer, Associate Vice President for Student Life and Development  
Cantey Heath, Chief of Staff, President's Office  
John Dozier, Chief Diversity Officer and Director of Community Engagement  
Jarod Holt, Associate Director of Fraternity and Sorority Life  
Aubrey Sejuitt, Vice President, Graduate Student Association  
Anthony Brockington, Gamecock Guarantee Coordinator  
Alkeiver Cannon, President, Association of African American Studies  
Ryan Miller, Alto Saxophone Section Leader, Band Representative  
Claire Randall, President, FemCo  
Karli Wells, President, Students Invested in Change (SIC)  
Mary Lombardo, Sorority Council



## **Social Compact Committee Executive Summary and Recommendations**

The Social Compact Committee was charged with developing informational papers on four issues i) alcohol and drugs, ii) campus sexual assault, iii) harassment and discrimination, and iv) hazing that notify students of information regarding their individual and shared responsibility for campus and community behavioral standards and to develop recommendations with respect to dissemination of information and compliance to students, parents, alumni, faculty and staff. The committee was divided into four sub-committees to address these key areas and members included faculty, students and staff of the university. There were a number of common recommendations from all sub-committees and these are listed below. In addition, there were certain sub-committee recommendations that were specific to their topical area.

### **General Recommendations from All Four Subcommittees**

1. In order to maximize the speed of culture improvement, there must be organizational change at the University of South Carolina (USC). Educational efforts that are currently underway across the university to deal with the issues of alcohol and drugs, campus sexual assault, harassment and discrimination and hazing must be brought under the same administrative umbrella and be coordinated for maximum impact. There are many units on campuses that occasionally work in an uncoordinated fashion and duplicate efforts. This more holistic view of campus culture must be reflected in an easy-to-navigate single website that addresses all four issues.
2. Efforts to improve the social climate of USC must target all employees of the university (faculty, staff, and administrators) and stakeholders (parents, alumni) and not just students. These efforts must be a community effort and not isolated in student services.
3. Any efforts to improve student culture with respect to hazing, harassment and discrimination, sexual assault and alcohol and drugs must be developed with student input and focus groups in order to develop methods that will have maximum impact. Similarly, efforts targeting other groups should be developed with their input. SC should use marketing research to develop the most impactful strategies.
4. Efforts that focus on students must be across all college years and be developmentally appropriate. Efforts should begin before students actually enter college.
5. Student leaders, faculty leaders, administrators and high-visibility alumni should be specifically targeted for education because of their ability to be strong agents of culture change. Some of these highly visible leaders may well serve as part of the marketing efforts.
6. Efforts to improve campus culture must be evaluated to determine impact. The student climate survey will serve as an excellent baseline as we move forward. There must be a commitment

towards evidence-based efforts and the flexibility to alter approaches should they prove to be of limited impact.

## **Key Recommendations from Specific Subcommittees**

### **Alcohol and Drug Subcommittee**

1. The university should establish and promote, through university funding, evening and weekend alternative, alcohol-free, student-desired activities on and off campus.
2. The university should initiate statewide lobbying efforts to reduce access and availability to illicit drugs and alcohol in hospitality districts surrounding the university and at student-attended events (such as Carolina Cup) that include: reducing high alcohol retail outlet density; enforcing S.C. laws on drink specials, happy hours and hours of operation; limiting alcohol promotional messaging on social media; and strict enforcement on minimum age drinking laws. Lobbying efforts also should include support for developing independent funding sources that allow for state and local offices to function without relying on the cost of underage drinking/misbehavior. This initiative should include collaborating with the City of Columbia and Richland County to develop and enforce laws addressing sales, service practices and environmental design in local hospitality districts.

### **Sexual Assault Subcommittee**

1. SAVIP, as the unit created by the university to prevent and respond to sexual assault, is the primary entity to conduct sexual assault prevention activities. To have the most impact, SAVIP needs additional staff and resources to conduct all of the activities that are needed to change the campus climate and reduce rates of sexual assault. SAVIP's efforts are guided by a strategic plan that reflects these recommendations and evidence-based strategies from the field of interpersonal violence prevention. Adequate funding, including professional positions, is necessary to achieve these outcomes.
2. Sexual assault perpetrators must be held accountable. Without students feeling that perpetrators will be held accountable and that victims will receive justice, few students will report victimization. The university should continue to explore means to hold sexual assault perpetrators accountable.
3. Implement an amnesty policy for students who have been underage drinking and contact USC police, Resident Mentors, or other university officials to report an emergency or to prevent someone from getting hurt. Students' concerns about 'getting in trouble' because of underage drinking is a **major** impediment to students reporting victimization and other concerning issues. The policy should be easily accessible, unambiguous, and clearly communicated to USC students so that in case of emergency, students know the risks and benefits of contacting USC authorities for assistance.

## Harassment and Discrimination Subcommittee

1. Diversity Preface: We recommend that prior to entering students taking the Social Compact Comprehension Quiz, they read a statement and be asked a question as to why diversity and inclusion are not only desirable but necessary tenets as stated in (or strongly implied by) the Carolinian Creed.
2. Outside the Zone Opportunities (OZO): We recommend a range of programming collaborations that will introduce new and continuing students to opportunities to understand various biases and to get beyond their “comfort zones” in creating a campus climate more aware of harassment and discrimination of forms – e.g. racism, sexism, homophobia, etc.
3. Gamecock CARE & Campaign: We recommend the Social Compact create a new program modeled after the exemplary “Safe Zone” and Diversity Educators Programs of the Office of Multicultural Student Affairs. “Gamecock CARE” stands for “Gamecock Community Allies Respecting Everyone.” The purpose of “Gamecock CARE” program is to encourage large number of students to undergo a cultural competence training and then to widely encourage discussions and dialogues among their classmates. We also recommend the creation of a campaign that tells the stories of various students in ways that feature the diversity of communities that are represented as part of the Carolina community.

## Hazing Subcommittee

1. A resource base that provides positive alternatives to hazing should be established by the University Leadership Service Center through Garnet Gate. People often engage in hazing under the belief that it promotes group cohesiveness, is an appropriate part of initiation ceremonies, or provides education on the history, goals, and mission of the organization. The education programs recommended above are directed at dispelling these misconceptions. It remains, however, desirable to accomplish these goals in a positive manner. For example, there are many resources available that include positive “team-building” activities. This resource base should be used in conjunction with the other recommended approaches to eliminate hazing and should include clear guidelines that distinguish hazing and team building through the use of the provided resources.
2. The Office of Student Affairs should develop an anonymous reporting website for hazing allegations in collaboration with athletics, band, ROTC, intramural sports, clubs and student organizations.
3. Fraternities and sororities should complete an organizational behavior change program/project through Being Plaid [www.beingplaid.com](http://www.beingplaid.com).

In addition to the recommendations, each subcommittee worked to develop informational papers with the intent that these would be used to educate students about their responsibilities as members of the USC community. The Social Compact Committee was unanimous in their agreement that the informational flyers would only have limited impact and that in no way could these informational flyers be considered as implementing substantive cultural change. It was hoped that they would just be the beginning of a comprehensive campaign for improvement of our campus culture. Each subcommittee compiled information and links with the goal of having a single one-sided flyer convey the essential

information on the very complex issues of alcohol and drugs, campus sexual assault, harassment and discrimination and hazing. Our student members emphasized that too much writing would drown the message. In an effort to make the flyers more student-friendly and more impactful, the flyers with the information were brought to a student team out of the School of Journalism for the input and suggestions. The student team included Mary Kate Korpita, Jenna Payesko, Gia Haygood and Lyndsey Carpeter and they were supervised by Mr. Jeffrey Ranta from the School of Journalism. They developed both the informational flyer graphics and single message flyers and these have been modified in response to committee input.

The flyers (both single message and informative) should be viewed as possible examples of a way to have a cohesive campaign for culture changes. We were not charged with developing a marketing campaign and would prefer to leave that to the experts. It should be noted that the student team developed some of the core ideas; there was not consensus in the committee about the presentation. As we indicate in our recommendations, student input on student-targeted efforts is essential and marketing research is essential.

However, the points conveyed on the informational flyers are viewed by the committee as information that is essential to convey to students.

The full subcommittee reports with more details and more specific recommendations follow and the informational flyers are appended on the end.

## **Alcohol and Other Drugs Subcommittee Full Report**

The Alcohol and Drugs Subcommittee of the Social Compact Study Group met several times to 1) review campus issues related to alcohol and drugs, 2) create a written document intended to notify students of information regarding responsibilities for behavioral standards related to alcohol and drugs (see document #1), and 3) to develop recommendations regarding information dissemination to students, parents, alumni, faculty and staff to increase compliance and facilitate culture change. A detailed summary of those recommendations, as well as general systematic considerations are listed below.

### **Recommendations for on-campus alcohol and drug prevention initiatives:**

- The university should develop and implement clear, consistent prevention communication messages that align with the institution's policies and practices and should be void of gaps and duplications.
- Prevention communication messages should begin in high school and extend through the student's graduation from college. The university should develop and adopt a matrix of key student touch point times beginning in high school and continuing through college graduation that identifies when prevention messages and information will be disseminated. The university should consider establishing a training team that goes to top USC feeder schools to discuss the ways to reduce the risks and negative consequences associated with alcohol and drug use in college. Research shows that the first six weeks of college are the most critical times for students to receive prevention messaging as students are beginning to identify with the university's cultural norms. For each student touch point marker, a complimentary prevention message should be sent to alumni, parents, student organizations, faculty and staff.
- The university should establish and promote, through university funding, evening and weekend alternative, alcohol-free, student-desired activities on and off campus.
- The university should increase efforts to change norms about drinking as associated with the SEC culture by requiring training for all faculty advisors and student organizations, to include all Greek fraternity, Greek sorority, honor, interest, international, media, military, political, and professional groups. This initiative should include the development of faculty training materials in addressing alcohol and drug issues and concerns during academic advising.
- The university should develop a systematic approach to address student substance use issues by providing a full continuum of alcohol and other drug university services to include prevention, early identification, intervention, treatment and recovery.
- The university must understand that reshaping norms, culture, and behavior requires motivation and educational interventions to prepare the Carolina community for change, skill building interventions to help members carry out new practice, and reinforcement/enforcement of the new structural changes. Institutional change occurs incrementally and over long periods of time. The university must be committed to these efforts for the long run in order to make sustainable changes.

### **Recommendations for off-campus initiatives:**

- The university should initiate statewide lobbying efforts to reduce access and availability to illicit drugs and alcohol in hospitality districts surrounding the university and at student-attended events (such as Carolina Cup) that include: reducing high alcohol retail outlet density; enforcing S.C. laws on drink specials, happy hours and hours of operation; limiting alcohol promotional

messaging on social media; and strict enforcement on minimum age drinking laws. Lobbying efforts also should include support for developing independent funding sources that allow for state and local offices to function without relying on the cost of underage drinking/misbehavior. This initiative should include collaborating with the City of Columbia and Richland County to develop and enforce laws addressing sales, service practices and environmental design in local hospitality districts.

## Campus Sexual Assault Subcommittee Full Report

Preventing sexual assault has been a longstanding focus at the University of South Carolina. The Office of Sexual Assault and Violence Intervention & Prevention (SAVIP) has been in existence for many years, long before such a resource was available on many other campuses. This history of attention to campus sexual assault resulted in the university being well-positioned to respond to the recent Title IX, Department of Education, and White House mandates to colleges to improve their efforts to prevent sexual assault, to provide high-quality support services to survivors, and to provide due process to victims and sexual assault perpetrators that serves justice, protects victims, and holds perpetrators accountable. The university has undertaken several measures in response to these recent mandates, including the formation of the Sexual Assault Communications committee. The committee spearheaded an initiative to improve the university's communications with students, staff, and faculty regarding their rights and responsibilities in the area of sexual assault, including the creation of a website ([www.sc.edu/stopsexualassault](http://www.sc.edu/stopsexualassault)). The university also implemented Haven, an online sexual assault prevention education module that is mandatory for entering students. Data on several important dimensions of the climate for sexual assault are collected as part of the Haven module, including students' experiences of sexual assault, bystander behavior to prevent assault and other harmful behaviors, and students' perceptions of campus social norms regarding sexual assault. A Haven training is also available for faculty and staff.

Unfortunately, sexual assault has proven to be an intractable human rights violation that plagues all sectors of society and all levels of education. Our internal data makes it clear that sexual assault happens on our campus, and is closely linked to the high levels of binge drinking that are endemic to our campus climate. We must step up our efforts. To this end, our recommendations are as follows.

1. The university should strategically examine existing working groups related to sexual assault prevention (Compliance, Title IX, Safety, Sexual Assault Communications, Campus Sexual Assault Prevention subcommittee of the Carolina Community Coalition) to determine the need to unite some groups and/or redirect their mission/s. **The ultimate goal here is to have a permanent working group to oversee efforts to prevent sexual assault that includes a broad cross-section of the university including students, faculty, and staff. The purpose of this group is to make sexual assault a university-wide effort in which everyone has a role.** Currently many of those outside of Student Services are not engaged in efforts to end sexual assault, not because they don't care about the issue, but because 1) they don't know what to do; 2) they feel "that's the job of Student Services". There is much empirical data from college campuses supporting the contention that **ending sexual assault has to be a community-wide effort**<sup>1</sup>. Changing the climate of the university with respect to sexual assault, especially on such a large campus, will require engagement from all sectors of the university, not just Student Services. The group should represent a wide variety of different sectors of the university and include representatives from student groups, faculty, SAVIP, USC Police, Office of Student Conduct, the Student Health Center, Housing, Fraternity and Sorority Life, Athletics, and others as needed.
2. The university needs to regularly assess the efficacy of these efforts.
3. Top university leaders, starting with President Pastides, should continue to be visibly involved in these efforts. This includes both Student Services leaders, leaders in Athletics, and academic leaders from

Deans to faculty. The university could also reach out to prominent alumni (e.g., George Rogers, Darius Rucker, Darla Moore, etc.).

4. SAVIP, as the unit created by the university to prevent and respond to sexual assault, is the primary entity to conduct sexual assault prevention activities. To have the most impact, SAVIP needs additional staff and resources to conduct all of the activities that are needed to change the campus climate and reduce rates of sexual assault. SAVIP's efforts are guided by a strategic plan that reflects these recommendations and evidence-based strategies from the field of interpersonal violence prevention. Adequate funding, including professional positions, is necessary to achieve these outcomes.

5. The first six weeks of a student's college career have been shown to be a particularly high risk time for sexual assault. SAVIP should be in every new student orientation and Pillars intensive orientation.

6. In the past, SAVIP trainings were required in U101 classes; however, at this time there are no required campus partner presentations for U101. SAVIP should conduct sexual violence prevention trainings in every U101 class as a part of the regular U101 curriculum. Evidence supports repeated exposure to positive messaging in order to prevent sexual violence<sup>2,3</sup>. Requiring SAVIP to present in all U101 classes will provide additional exposure for one of the most at-risk populations for sexual violence victimization, college freshmen (other exposures to messaging include Haven and programming in summer orientation).

**7. Sexual assault perpetrators must be held accountable.** This is a focus of *Not Alone: The First Report of the White House Task Force to Protect Students from Sexual Assault*. Without students feeling that perpetrators will be held accountable and that victims will receive justice, few students will report victimization. The university should continue to explore means to hold sexual assault perpetrators accountable. A goal of SAVIP's strategic plan is to increase reporting of sexual assaults; when students report, students receive services which include investigative and judicial options. Related to the above recommendation, the permanent working group should communicate regularly with the Office of Student Conduct and other university entities regarding how cases of individuals accused of sexual assault are handled. In addition this exchange of information will allow the working group to discuss trends to inform and sharpen prevention messages and programs for the campus community.

8. Special efforts need to be undertaken to engage male students, faculty, and staff as allies in preventing sexual violence. This is a best practice from *Not Alone: The First Report of the White House Task Force to Protect Students from Sexual Assault*. SAVIP has been engaged in reaching out to male students for several years and should continue and broaden these efforts.

9. Implement an amnesty policy for students who have been underage drinking and contact USC police, Resident Mentors, or other university officials to report an emergency or to prevent someone from getting hurt. Students' concerns about 'getting in trouble' because of underage drinking is a major impediment to students reporting victimization and other concerning issues. The policy should be easily accessible, unambiguous, and clearly communicated to USC students so that in case of emergency, students know the risks and benefits of contacting USC authorities for assistance. Students should be informed of the diversion programs that already exist in the South Carolina law that prevent convictions for misdemeanors especially involving underage drinking. It is important that students understand that they can call for help without losing scholarships, suspensions, or other permanent legal consequences. This is a best practice according to *Not Alone: The First Report of the White House Task Force to Protect*



*Students from Sexual Assault.* Amnesty policies have been implemented at other universities (e.g., University of Southern California, University of Oregon, University of Texas at Tyler, etc.).

10. The Haven training is a useful starting point, but by itself is insufficient to change the campus climate and reduce rates of sexual assault. All students, staff, and faculty need repeated exposure to educational messages explaining what sexual assault is and what their rights and responsibilities are. Guidance from the Office of Civil Rights and the Department of Justice Office of Violence Against Women is clear that online education by itself is insufficient.

11. Sexual assault is not an easy topic and many people become defensive, uncomfortable, frightened, or feel that they are being accused of something when exposed to information about sexual assault. Repeated conversations that give people an opportunity to work through these feelings are critical to help people understand the issues rather than shutting down and rejecting the message. These conversations are to be facilitated by a professional staff member or well-trained graduate student who is knowledgeable about sexual assault, and has been trained to help people process defensiveness as well as difficult emotions that may come up in such a discussion.

12. SAVIP has a number of trainings that accomplish the above goals, but currently only has the resources to reach a minority of the university community. To increase their capacity to provide sexual assault training, SAVIP has developed the Stand Up Carolina Program and is now implementing a Train the Trainer program that will allow them to train a cadre of students, faculty, and staff who can deliver the sexual assault training to their peers.

13. All sexual assault educational programming should include the role of alcohol and other drugs in sexual assault. To this end, SAVIP has begun a partnership with SAPE, and Fraternity/Sorority Life with the goal of creating safer social environments.

14. All sexual assault educational programming should include the theme of helping survivors and not blaming them. This presentation should include trauma-informed education. SAVIP has already begun this with presentations to Greek Leadership on how to support survivors.

15. Continue and enhance SAVIP's involvement in Resident Mentor training. Work with Housing to have sexual assault prevention as one of the foci of the Community Education teams.

16. SAVIP can continue to conduct and enhance in-depth interpersonal violence and trauma-focused training for the Carolina Judicial Council.

17. SAVIP can continue to enhance their existing partnerships with student organizations (Greek Life, Student Government, etc.) and seek opportunities for training and recruiting Stand Up Carolina Trainers from these organizations. As a component of these partnerships, SAVIP can collaborate with student organizations to create sexual assault prevention campaigns that the student organizations conduct. Encourage student organizations and other campus entities to reach out to SAVIP when they conduct events related to sexual assault (e.g., awareness-themed events such as Domestic Violence Awareness month in October, Sexual Assault Awareness month in April, etc.).

18. SAVIP can reach out to commuter students, transfer students, and non-traditional students who may not take U101. SAVIP should present to transfer students in their orientations.

19. Continue and enhance existing SAVIP partnerships with off-campus apartment complexes.

20. Promote SAVIP partnerships with parent groups through Parent Advisory office. Work with parent newsletter and listserv.
21. Sexual assault prevention should be a mandatory component of training for student organization renewal.
22. SAVIP can reach out to numerous student groups including but not limited to: McNair and Carolina Scholars, Athletics, Business student organizations, Capstone scholars, Fraternity and Sorority Life organizations.
23. Develop a Healthy Relationships & Consent student organization with a faculty advisor from the permanent working group.
24. Consider adding membership in a student organization that focuses on sexual assault prevention as a way to fulfill the requirements for Graduation with Leadership Distinction. Tie this to the University 401 course.
25. A “popular opinion leader” model should be explored as a strategy to change campus culture. This model has much empirical support from the research literature<sup>4</sup>. Leaders from arenas such as Athletics, ROTC, Residence Halls, Faith-based groups, Student Government, Greek Life leadership, Nursing leaders, USC Police, Faculty Senate, Staff, and Student organizations are all examples of leaders that could be targeted.
26. Add a “Hero Organization” component to the existing “Hero Awards.” Organizations that take steps to reduce sexual assault, have student and faculty leadership complete training, invite SAVIP to at least one meeting and/or do other sexual violence educational or community service activities could be named a “Hero Organization.”
27. Communications containing educational messages about sexual assault have been ongoing, and should be enhanced. These communications can be distributed through outlets such as USC emails, scrolling messages in campus buildings, posters on bulletin boards in campus buildings, etc. The permanent working group can coordinate with the USC Office of Communications to plan the best strategy for these communications. For example, another letter from President Pastides in support of prevention efforts to end sexual assault on the USC campus would be very helpful.
28. Involve coaches and athletes to promote sexual assault prevention at sports events, as has been done in the past. Print Stand Up Carolina on sports tickets and show Stand Up video at games similar to what has been done in the past. Funds from Athletics would need to be provided for these efforts.

## **Citations**

- 1 Banyard, V.L., Plante, E.G., & Moynihan, M.M. (2004). Bystander education: Bringing a broader community perspective to sexual violence prevention. *Journal of Community Psychology*, 32, 61-79.
- 2 Not Alone: The first report of the White House Task Force to protect students from sexual assault. April, 2014. Downloaded from <https://www.notalone.gov/assets/report.pdf>.
- 3 Preventing sexual violence on college campuses: Lessons from research and practice. Part one: Evidence-based strategies for the primary prevention of sexual violence perpetration. Downloaded from <https://www.notalone.gov/assets/evidence-based-strategies-for-the-prevention-of-sv-perpetration.pdf>.

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## Harassment & Discrimination Subcommittee Full Report

### Summary of Programmatic Recommendations

This subcommittee drafted an educational flyer directed at entering students that outlined the following broad principles including: (1) Gamecocks Respect All Differences; (2) Gamecocks Don't Assume Based on Appearances; (3) Gamecocks Know Impact Matters; and (4) Gamecocks Stand Up, Not Just Stand By. After discussions during our November 11, 2015 meeting, our February 2, 2016, as well as email correspondence, this subcommittee has devised the following brief set of recommendations whose objectives align with the broader principles we articulate to the students. The following is a summary of our programmatic recommendations, which act upon these principles and we further detail in this document:

1. Social Compact Coordinator: We recommend the creation of new staff position within the Division of Student Services of a Social Compact Coordinator whose office will be responsible for serving as the key point of program coordination, collaboration, education, and outreach with all aspects of the Social Compact, but especially anti-harassment and anti-discrimination best practices.
2. Social Compact Comprehension Quiz: We recommend the creation of a Social Compact Comprehension Quiz whose purposes is to inform, test, and challenge students to be able to give basic application to all facets of the Social Compact. Of course the anti-harassment and anti-discrimination principles is one of those facets.
3. Social Compact Website and Training: We recommend the creation of a Social Compact website that can serve as a central repository for information related to the compact as well as new and current opportunities for training and workshops with regards to cultural competence, cultural empathy, and identifying practices bias, stereotyping, microaggression, and other forms of discrimination.
4. Diversity Preface: We recommend that prior to entering students taking the Social Compact Comprehension Quiz, they read a statement and be asked a question as to why diversity and inclusion are not only desirable but necessary tenets as stated in (or strongly implied by) the Carolinian Creed.
5. Outside the Zone Opportunities (OZO): We recommend a range of programming collaborations that will introduce new and continuing students to opportunities to understand various biases and to get beyond their "comfort zones" in creating a campus climate more aware of harassment and discrimination of forms – e.g. racism, sexism, homophobia, etc.
6. Fraternity & Sorority Programming: We recommend the Office of Fraternity and Sorority Life further coordinate or introduce new programs in collaboration with the Social Compact where Greek organizations play a leadership role in demonstrating how to break down cultural and social barriers and further awareness of anti-harassment and anti-discrimination practices.
7. Gamecock CARE & Campaign: We recommend the Social Compact create a new program modeled after the exemplary "Safe Zone" and Diversity Educators Programs of the Office of Multicultural Student Affairs. "Gamecock CARE" stands for "Gamecock Community Allies Respecting Everyone." The purpose of "Gamecock CARE" program is to encourage large number of students to undergo a cultural competence training and then to widely encourage

discussions and dialogues among their classmates. We also recommend the creation of a campaign that tells the stories of various students in ways that feature the diversity of communities that are represented as part of the Carolina community.

8. Learning Environment: We recommend Social Compact programming and materials convey to students that they are members of a learning environment thus there are several resources available to them for them to clearly understand anti-harassment and anti-discrimination best practices as well as relevant academic courses that discuss issues of race, gender, sexuality, class, and/or religious difference, etc. and the intersections of these differences.
9. Incident Reports and the Code of Conduct: We recommend, along with stressing current incident report links, that both on the website of the Office of the Student Conduct as well as a prospective Social Compact Site that there be a link that specific refers to the section of the code that state Non-Discrimination Policies via a “Harassment and Discrimination” link.
10. Instructors, Faculty Members, Administrators and Staff: We recommend there be a clear effort at outreaching and informing instructors, faculty members, administrators and staff members of the tenets and programming of the Social Compact in all of its facets including anti-harassment and anti-discrimination principles.

## Explanation

Before detailing our recommendations under each of the above principles, however, there are important *a priori* considerations. As educators, academic leaders, as well as student services professionals, we believe there is a range of information that is needed to fulfill the USC Board of Trustees’ and President Harris Pastides’ charge of forwarding recommendations that may help to foment a change in USC’s student culture around issues of diversity, harassment, and discrimination. In section I, we discuss the need to first assess and evaluate the broad “student climate” on questions of diversity, discrimination, and harassment as well as the “resources” currently available to students in grappling with these concerns. There is also a need to provide central coordination of pre-existing or new diversity efforts so that we do not complicate a somewhat already patchwork series of Then in sections II-V, we discuss several ideas as to how the University might programmatically encourage anti-harassment and anti-discrimination behavior among entering classes.

### I. Climate, Resources, and Coordination

Of course USC has already has a number of policies, programs, and resources that are tasked with creating a USC climate conducive to diversity and anti-harassment and anti-discrimination. *We recommend the implementation of our specific subcommittee recommendations mindful of the findings of the upcoming student campus climate study as well as mindful of the extant resources available to students, parents, and others concerned about anti-harassment and anti-discrimination best practices.*

- a. Current Student Climate: Of course any new initiatives that seek to ensure entering classes are fully aware of anti-harassment and anti-discrimination best practices would be implemented within the current USC student campus climate with its opportunities and challenges for greater diversity across a range of student populations. For the spring of 2016, Provost Joan Gabel authorized a campus-wide student co-led by the

Office of Diversity and Inclusion as well as the Division of Student Affairs. One example of diversity is of course greater racial and ethnic diversity among the students enrolled at the flagship, Columbia campus of USC. Although there has been a small amount of progress in increasing minority student enrollments when we compare the fall 2009 to the fall 2015<sup>1</sup>, we know there remains persistent challenges to ensure the Columbia campus – the flagship of the state’s leading public institution of higher education - is more fully representative of the percentage African Americans and other minority populations comprise of the state’s citizenry.<sup>2</sup> There are no doubt a range of other challenges in which students who non-English native speakers, LGBT, and are not from Christian religious backgrounds (to name a few of the possibilities) also have to navigate a climate where they are numerical minorities. Women students are not a numerical minority but confront the unique barriers imposed by sexism and sexual discrimination. We reiterate that, a realistic appraisal of the opportunities and challenges we as a campus face is critical to the success of educating entering classes of anti-harassment and anti-discrimination best practices.

- b. Current Student Resources: *We recommend entering students eventually receive a brief publication – possibly as brief as a “FAQ – Frequently Asked Questions” flyer – that gives them a fairly comprehensive “Snapshot” of links to relevant policies, training workshops, and other educational resources.* At the end our proposed student education flyer, we list a few of the many resources the USC campus provides to entering students and their families to educate them relative to anti-harassment and anti-discrimination best practices. There is of course a bevy of expertise and information that the Office of Equal Opportunity Programs, the Office of Diversity and Inclusion, and the Office of Multicultural Student Affairs provide and/or could provide to entering students. In fact, the EOP website is a great repository for the policies, practices, and training opportunities afforded to students because quite naturally that office leads campus efforts in reporting and addressing harassment and discrimination claims, especially as related to employment.<sup>3</sup> The Diversity and Inclusion website is a great repository for various ways the university and its member units are attempting to create a more inclusive campus environment.<sup>4</sup> And the website of the Office of Multicultural Student Affairs excellently features various student services and activities that promote a more diverse and inclusive campus environment.<sup>5</sup> But we think it is important to assess the Social Compact experience – realize those student that frequently emerge after the implementation of the Social Compact – so we readily put key links at the fingertips of entering students and their parents. *We also recommend the hiring of Social Compact Coordinator and Advisory Committee.*
- c. Coordination: *We recommend that this Social Compact effort be seen as part of a larger effort at coordinating Diversity and Inclusion efforts across the campus based on an assessment of present resources.* We know that the Office of Diversity and Inclusion has begun to do this work but more work is needed. We want to avoid the Social Compact becoming part of any student services “silo.” For example, Student Conduct has an entire office dedicated to CREED programming, but more need to be

aware of its efforts. Larger efforts at centralized coordination are key to the success of each program.

## II. Gamecocks Respect All Differences

This principle rests upon the tenets of our creed that stress, “I will respect the dignity of all persons,” and “I will discourage bigotry, while striving to learn from differences in people, ideas, and opinions. *We recommend that the anti-harassment and anti-discrimination programming components of the Social Compact stress the primary importance of diversity and inclusion as well as the need for students to get beyond their biases and comfort zones.* There is a great need for diversity as well as anti-harassment and anti-discrimination programming to be articulated and resourced as central to the university’s mission.

- a. Diversity First: If students value diversity and see it as integral to campus culture, then they are more receptive to learning what constitutes harassment and discrimination. Research has strongly indicated that student campus climates do not become more inclusive and respectful of various differences simply by colleges and universities admitting a more racially/ethnically diverse student body.<sup>6</sup> It is vital for there to be robust student services programming as paralleled by academic initiatives. But students should be informed as to why diversity is not only a desirable but necessary value in a leading public institution of higher learning. Diverse perspectives often exponentially increase problem-solving capacities because they interject new insights, new questions, and new skills.<sup>7</sup> *We recommend that current efforts that ensure students comprehend the above principles of the Carolinian Creed<sup>8</sup> stress how diversity is a necessary value or good, not simply a desirable one.* We recommend this be done by:
  - i. Social Compact Comprehension Quiz: As true for entering students being required to ensure they understand the university’s policies with regards to drugs and alcohol (as well as the Carolinian Creed), we recommend the creation of an on-line certification quiz that requires students to display comprehension (and basic application) of all of the principles of the Social Compact including those we have outlined as part of the anti-harassment and anti-discrimination component.
  - ii. Diversity Preface: Before taking the anti-harassment and anti-discrimination segment of the Social Compact Quiz, they should read a statement and then be asked a brief question(s) as to why the university sees diversity not just as desirable but necessary.
- b. Beyond Biases and Comfort Zones: As instructors, staff members, and administrators, we certainly seek to create a climate at USC that is conducive to learning and student life that ‘respects the dignity of individuals’ as asserted by the Creed. But to learn and to be part of a community requires students to learn new things, have new experiences, and expand beyond the boundaries of knowledge and networks they already inhabit. *Therefore, we recommend that Social Compact programming encourage entering students to go beyond their biases – those uninformed perceptions*

they have of groups to which they do not belong – and their comfort zones – those familiar (if also narrow) friendship networks and group affiliations. Some of these programs might include:

- i. Outside the Zone Opportunities (OZOs): A week of activities programmed by Student Services units (most especially OMSA) that draw on pre-existing models of awareness education but ensure they are broadcasted to a larger segment of the entering class and general student body including the (A) Oppression Walk; (B) Diversity Dialogue Series; (C) Empower Multicultural Lunch & Learns Series; (D) Cultural and Heritage Month Celebrations. With the last set of celebrations we believe it is important that they be co-sponsored by units, such as the Social Compact, and not be seen as mainly (or only) the purview of OMSA and/or its component student organizations.
- ii. Fraternity & Sorority Programming: A series of activities co-sponsored and programmed by the Sorority Council, the Fraternity Council, and the Office of Fraternity and Sorority Life that purposefully attempt to ask (a) what the barriers that separate students within Greek Life; (b) what can we do to consciously create opportunities for meaningful social and civic exchange among traditionally minority and predominantly non-minority Greek organizations? This program is useful in that he will help foster diversity principles along the pipeline of student life as some entering students later become affiliated with Greek organizations; and of course it will also foster greater diversity among upperclassmen.

III. Gamecocks Don't Assume Based on Appearances: It is important to stress to entering students and their other classmates that stereotypes of various kinds – racial/ethnic, gender, sexual orientation or otherwise – often rest on false presumptions about physical distinctions and behavior, can detract from creating open and respectful learning communities.<sup>9</sup> *We recommend that Social Compact Programming stress the values of cultural competence and cultural empathy, as also found in tenets of the Carolina Creed.*

- a. Cultural Competence: This concept is relevant to higher education because it asserts that it is difficult for students to learn in environments where their important social or group identities and the cultures of their communities are not respected and/or fully recognized by fellow classmates as well as staff members and teachers. At the heart of cultural competence is the need to value diversity. The following programs could be helpful reinforcing this concept as part of the Social Compact:
  - i. Diversity Training: The USC Center for Teaching Excellence offers a training module (facilitated by OMSA Director Shay Malone) that could be extended to staff members and instructors who interact with entering students and thus would reinforce this concept as part of the Social Compact.<sup>10</sup>
  - ii. Cultural Competence Web Link: As part of a Social Compact Website, offer a range of resources available to students to learn about the principles of cultural competence.
- b. Cultural Empathy: The Carolinian Creed includes the following tenet, "I will demonstrate concern for others, their feelings, and their need for conditions which



support their work and development.” This it is akin to the concept of cultural empathy or the ability to understand, accept, and sympathize with someone else’s point of view. The following programs could be helpful reinforcing this concept as part of the Social Compact:

- i. Gamecock CARE (Community of Allies Respecting Everyone): The current LGBT “Safe Zone Program”<sup>11</sup> provides an excellent model for us to consider a program whereby entering and other students – most especially student staff members in the Residence Halls – undergo training in the principles of cultural competence, stereotyping, microaggression in the classroom, residence hall, social organization, etc. Having a campaign whereby students assert they are part of a community of “CARE” through buttons, pins, and bumper stickers would help foster a more inclusive campus climate.
- ii. Reinforcing Programs: There are several programmatic recommendations we have already named that will reinforce cultural empathy including greater student awareness of the Cultural Heritage Months.

IV. Gamecocks Know Impact Matters: We are stressing that students should be aware that good intentions in terms of words and actions are necessary but not sufficient in creating an inclusive campus climate. *Therefore, we recommend that programming with the Social Compact convey concepts to entering students such as microaggressions and intersections.*

- a. Microaggressions: These processes are what Derald Sue and colleague label, “...the brief and commonplace daily verbal, behavioral, or environmental indignities, whether intentional or unintentional, that communicate hostile, derogatory, or negative...slights and insults toward...” various minorities.<sup>12</sup> Again, these slights can be “unintentional” but can have a real impact on the experiences of individuals. One way to handle them is:
  - i. Quiz Inclusion: With the aforementioned Social Compact Comprehension Quiz, we recommend the inclusion of application questions that ask entering students to assess situations to understand whether “unintended slights” matter. We want all students to be able “cite slights” as part of campus life.
  - ii. Links & Training Inclusion: As part of a Social Compact Website, we recommend giving students straightforward resources to understand and recognize when others have been subjected to microaggressions. As part of the OMSA Diversity Training we previously discussed the resources already provided on campus to instructors and staff members, which could be further extended to students and student leaders.<sup>13</sup>
- b. Intersections: As implied by the creed, it is important we convey to students it is important they remain open-minded as to how others see themselves and the communities to which they belong. To understand others is understand the full stories they share and its complexity. For example, it is very possible for a person to be of color as well as LGBT, Muslim and self-identify as white. This concept of intersections or intersectionality simply is the understanding that various identities as well as

discriminations can overlap and in possibly reinforce each other.<sup>14</sup> We recommend conveying this to students in various ways one of which is:

- i. Gamecock Allies Campaign: We recommend another component of the Gamecock Allies Program including an outreach/publicity effort including campus banners, videos, and website links that features and sensitizes entering and other students to the stories of students who live ordinary, full lives at various intersections of say gender, race, religiosity, and to the degree possible, other identities like sexual orientation.

V. Gamecocks Stand Up, Not Just Stand By: We are stressing to students the best way to build an inclusive community is to build an accountable community or one whereby individuals are mindful of and assume responsibility for their words and actions. *We recommend that we further build an inclusive and accountable USC community by Social Compact programming focusing upon -- the learning environment; incident reports and responses; and the role for instructors, faculty members, administrators, and staff members.*

- a. Learning Environment: It is important for students to understand that as members of a learning environment there are several resources available to them to clearly understand the principles of anti-harassment and anti-discrimination best practices from student affairs. In addition, there are relevant academic courses that they may take to be educated on the societal consequences of harassment and discrimination. *Again, we recommend the Social Compact Website should be a repository for such information.*
- b. Incident Reports and the Code of Conduct: The present Diversity and Inclusions as well as EOP websites do an excellent job of providing students resources for understanding and reporting harassment and discrimination incidents. The Office of Student Conduct also clearly has a process for adjudicating incidents or elements of harassment and discrimination or referring relevant behaviors to those that fall under the specific purview of EOP.<sup>15</sup> *We recommend that both on the website of the Office of the Student Conduct as well as a prospective Social Compact Site that there be a link that specific refers to the section of the code that state Non-Discrimination Policies via a "Harassment and Discrimination" link.*<sup>16</sup>
- c. Instructors, Faculty Members, Administrators and Staff: It is important to recognize that outside of students – especially entering students – that instructors, faculty members, administrators and staff set the tone for establishing an inclusive and non-discriminatory campus environment. *We recommend there be a clear effort at outreaching and informing them of the tenets and programming of the Social Compact in all of its facets including of anti-harassment and anti-discrimination.* This could be way of mass emails, informational flyers, and information provided during new faculty and staff orientations.

## Citations

- 1 Refer to [http://www.sc.edu/about/offices\\_and\\_divisions/diversity\\_and\\_inclusion/key\\_diversity\\_initiatives/](http://www.sc.edu/about/offices_and_divisions/diversity_and_inclusion/key_diversity_initiatives/)
- 2 South Carolina Commission on Education. 2014. South Carolina Education Statistical Abstract. Columbia, SC.
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- 7 Page, Scott. The Difference: How the Power of Diversity Creates Better Groups, Firms, Schools, and Societies. (2007)
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- 9 Tadmor, Carmit T., et al. "Not Just for Stereotyping Anymore Racial Essentialism Reduces Domain-General Creativity." *Psychological Science* 24.1 (2013): 99-105.
- 10 Refer to [https://www.sc.edu/about/offices\\_and\\_divisions/cte/events\\_calendar/spring\\_2016/cultural\\_competence\\_communication.php](https://www.sc.edu/about/offices_and_divisions/cte/events_calendar/spring_2016/cultural_competence_communication.php)
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- 12 Sue, Derald Wing, et al. "Racial microaggressions in everyday life: implications for clinical practice." *American psychologist* 62.4 (2007): 271.
- 13 Refer to [https://www.sc.edu/about/offices\\_and\\_divisions/cte/events\\_calendar/spring\\_2016/cultural\\_competence\\_communication.php](https://www.sc.edu/about/offices_and_divisions/cte/events_calendar/spring_2016/cultural_competence_communication.php)
- 14 Crenshaw, Kimberle. "Mapping the margins: Intersectionality, identity politics, and violence against women of color." *Stanford Law Review* (1991): 1241-1299.
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- 16 Refer to <https://www.sa.sc.edu/osc/>

## **Hazing Subcommittee Full Report**

### **Description of the Problem**

Hazing is defined as any activity undertaken by a group or organization or a member of that group or organization in which members or prospective or uninitiated members are subjected to activities which harass, intimidate, physically exhaust, impart pain, cause undue mental fatigue/distress, emotional distress or engages in any conduct which presents a threat to health and safety.

### **National Status**

Hazing occurs within high school sports teams, college athletic teams, military groups and student organizations including fraternities and sororities. In a recent study on hazing in college bands, one-third of band members observed hazing incidents, although 60 percent of those who observed hazing believe their teachers/directors were aware of the situation. Similarly, a University of Maine hazing survey found that more than half of college athletes have experienced hazing and almost half of all high school students will graduate having experienced at least one hazing incident. In 2011, Robert Champion, a member of the Florida A&M University Marching Band died of a hazing incident where he was beaten repeatedly as part of an initiation for band pledges. Four former band members have been charged with manslaughter and hazing with the result of death. Hazing does not discriminate and is an equal opportunity disgrace regardless of group, racial identity or ethnicity. Fraternities and sororities probably receive the most media attention related to hazing incidents although the abuse is not limited to Greek-letter organizations. Hazing behaviors related to personal servitude (running errands, driving, requiring new members to carry certain items on their bodies, cleaning, etc.) are most prevalent in Greek organizations.

### **Status in Higher Education**

Hazing is about group-think and power. Individuals crave connections. Connections can create hierarchy, power and rank. In order to develop the connections, individuals (students) act in a certain way because of the group and the desire to fit in and be included. Dishonesty follows with a dysfunctional attitude that justifies the behavior and attitude. Individuals neglect to report incidents of hazing, passing off the behavior as a rite of passage. Hazing is difficult to prosecute due to the code of silence that individuals often assume during investigations. The University of Maine survey showed that in 95 percent of the cases where students identified their experience of hazing, they did not report it to campus officials.

Times have changed. Behaviors that were once tolerated are no longer tolerated. The stakes are higher, and the risk and liability is greater for organizations and institutions. Hazing incidents are often linked to other high-risk and abusive behaviors such as alcohol use, sexual assault/violence and potentially death. In 2014, alleged extreme hazing in the football program in Sayreville, N.J., reads more like violent prison gang rape. This incident points to a disturbing trend of sexual violence in hazing.

Hazing has claimed the life of at least one student on college campuses each year from 1970 to 2015. In the United States, 44 states have hazing laws, but these laws often do not serve as a deterrent for the behavior. Florida has one of the toughest hazing laws in the country, but it ignores the role of willing victims. South Carolina is one of several states that make failure to report hazing a crime.

### **Status in South Carolina**

In the state of South Carolina, four campuses have dealt with hazing incidents during the 2014-2015 academic year.

- Furman University suspended Sigma Alpha Epsilon in the fall due to hazing activities that included forced alcohol consumption.
- Four upper class cadets at The Citadel left school voluntarily and 20 others were disciplined following an institutional investigation of 85 allegations involving hazing.
- Sigma Phi Epsilon was suspended at Clemson University in September 2014 following the death of a pledge who is alleged to have been involved in pledge runs and providing McDonald's breakfast for brothers.
- Kappa Sigma was suspended for five years at the University of South Carolina for hazing, which included finding 33 pledges in an off-campus house in October 2014.

### **Hazing Subcommittee Recommendations**

Our recommendations concern the entire spectrum of the social compact, including but not limited to hazing. In listening to many different people we have come to the conclusions that it is important for the student to:

Receive the information on the expectations and resources associated with the social compact as early as possible in their college career.

Receive the information multiple times in several formats.

"Evolve" the message so it is better able to match the experiences and maturation of the student.

Accordingly our recommendations are:

1. Expand upon the existing procedures of having the students receive information and participate in Alcohol.edu prior to their arrival at USC so that it includes a coherent body of information. This should include:
  - a. Documents that include all four components of the social compact, including clear and direct statements of the University policies and practices that prohibit hazing.
  - b. Expansion of the Alcohol.edu format to include information, policies, and practices prohibiting sexual assault, hazing, and discrimination. These should be developed as independent modules and the student should be required to complete the review of these materials and return a signed form indicating their understanding and intention to comply with these policies prior to admission to USC.
2. As is presently the policy with Alcohol.edu the student should be required to complete a follow-up program that reiterates the policies of the University, the expectations that Gamecocks have of each other with respect to all of the elements of the social compact and the resources available to the student. This session should be proactive and emphasize the important role the student has in both protecting themselves and in protecting others.

- a. Separate modules emphasizing each element of the Social Compact should be either adopted from existing sources or locally developed. Ideally this information would be available as an on-line course that has been produced by USC students.
  - b. The Office of Student Affairs should review these modules to assess they may be completed within a reasonable time-frame. Individual modules can and should differ in length depending upon the subject and relevance to students within their first semester and should not become so lengthy as to become a burden.
3. UNIV 101 should include major curricular elements that address the components of the social compact. Most UNIV 101 instructors already include components of the Social Compact in their curriculum. We recommend the development of a curriculum that includes all four components of the Social Compact that can be reliably and consistently presented by all UNIV 101 instructors. This curriculum would have to be designed to fit within the present demands of UNIV 101. To this end we recommend:
  - a. UNIV 101 should revise its learning outcomes to include student awareness of university policies, practices and positions regarding hazing, discrimination, alcohol and drugs, and sexual assault.
  - b. To support these learning outcomes, students should be required to attend at least one presentation (outside of class) that addresses these concerns. USC students should be instrumental in developing any “beyond the classroom” presentations that support the learning objectives. The Office of Student Affairs is likely the appropriate office to develop these activities.
  - c. Again, these activities will be most effective if they are designed by the students and include participatory learning.
4. There should be an on-line leadership course that is required for any student to assume a leadership position in any student organization. The course should emphasize the responsibilities of the leader, their role in protecting welfare of the students they lead, self-less leadership and the critical role of inclusiveness in the success of their organization. Ideally this on-line course would be created by USC students and would include scenarios to illustrate problem solving of social compact challenges they may face as leaders. This course should be made available through the Leadership Service Center who should also monitor the status of student leaders in completing the course.

In addition to being required for students who are serving as leaders of their University organization(s), the proposed leadership course can reach a wider audience if:

- a. Completion of the leadership course is included as a requirement to earn Leadership with Distinction through USC Connect.
  - b. Is offered as part of the Preparing Future Faculty program available through the Center for Teaching Excellence.
  - c. Completion of the course is required of all faculty advisors to University organizations.
5. A coherent and ongoing public information campaign will be needed to support the social compact. The marketing message needs to be relatively simple (e.g., “Don’t cross the line;” with separate messages defining where “the line” is for the four areas covered by the social compact. It must be clear that free and open communication is a right of all students, but

there is a “line” that must not be crossed between acceptable behavior and behavior that has the potential to harm another member of the campus community.

6. A resource base that provides positive alternatives to hazing should be established by the University Leadership Service Center through Garnet Gate. People often engage in hazing under the belief that it promotes group cohesiveness, is an appropriate part of initiation ceremonies, or provides education on the history, goals, and mission of the organization. The education programs recommended above are directed at dispelling these misconceptions. It remains, however, desirable to accomplish these goals in a positive manner. For example, there are many resources available that include positive “team-building” activities. This resource base should be used in conjunction with the other recommended approaches to eliminate hazing and should include clear guidelines that distinguish hazing and team building in the use of the provided resources.
7. The Office of Student Affairs should develop an anonymous reporting website for hazing allegations in collaboration with athletics, band, ROTC, intramural sports, clubs and student organizations.
8. Fraternities and sororities should complete an organizational behavior change program/project through Being Plaid ([www.beingplaid.com](http://www.beingplaid.com)).
9. When an organization has more restrictive policies regarding hazing than those adopted by the University, the more restrictive policies will apply. Conversely, when an organization has less restrictive policies regarding hazing than those adopted by the University, the University policies will apply.
10. Develop and institute a training curriculum for faculty advisors on their role and responsibility if they become aware of an alleged incidence of hazing.

# **Gamecocks commit to the responsibility of making low risk healthy choices related to alcohol use.**

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## **Everyone is Responsible for Helping to Keep Our Campus Safe & Healthy**

- **Honor SC law and university policy prohibiting the consumption of alcohol under the age of 21**
- **Consider the academic & legal consequences from choosing to drink alcohol**
- **Choose fun, alternative activities not involving irresponsible use of alcohol**
- **Create and stick to a realistic safety plan when going out with friends**

**Nationwide high-risk student drinking contributes to an estimated 1,800 preventable deaths each year.**



## **Know Your Resources**

Substance Abuse Prevention and Education: 803.777.3933  
Student Health Services, Counseling & Psychiatry: 803.777.5223  
Gamecock Recovery: 803.777.9374  
LRADAC: 803.726.9



# Gamecocks prevent sexual assault on campus.

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1 in 5 college women and 1 in 16 college men are sexually assaulted.

**When you join the Carolina community, you commit to becoming an active part of the effort to stop sexual assault on our campus**

## **Get Consent**

- Each person must be clear to what they are agreeing to
- Be willing, not forced or coerced

## **Stand Up**

- Watch out for one another and speak up if something isn't right
- Don't let another student get hurt
- Be an active bystander

## **Don't use Alcohol as an Excuse**

- If someone is incapacitated from alcohol or drugs, they are NOT capable of giving consent
- Having sex with someone who is incapacitated is a felony in SC

## **Help Survivors, Don't Victim Blame**

- Be encouraging and supportive
- Don't ask them what they did wrong



## **Know Your Resources**

Sexual Assault and Violence Intervention & Prevention: 803.777.8248

Title IX Coordinator: 803.777.3854

Campus Police: 911 or 803.777.4215

Sexual Trauma Services of the Midlands: 803.771.7273

Find out more at [sc.edu/stopsexualassault](http://sc.edu/stopsexualassault)

# Gamecocks are a community where everyone feels welcomed.

---

## Respect All Differences

- Respect the dignity of others
- Discourage bigotry while learning from the differences of people, ideas and opinions

## Don't Assume Based on Appearance

- How others self-identify
- What term or name they prefer when referred to
- How others prefer to be treated based upon how they self-identify

## Impact Matters

- You don't have the right to tell someone she or he shouldn't be offended
- If you don't understand why someone is offended by your words or actions, ask them and listen with respect and openness
- Speak and act respectfully

## Don't Stand By, Stand Up

- Let those offended know you are an ally
- Talk with people whose words were offensive and let them know why
- Get advice from someone who is knowledgeable about issues of harassment and discrimination and whom you trust about how to respond and report if necessary



## Know Your Resources

Carolinian Creed: [sa.sc.edu/creed/](http://sa.sc.edu/creed/)

Equal Opportunity Programs: 803.777.3854

Office of Diversity & Inclusion: 803.777.9943

Office of Multicultural Student Affairs: 803.777.7716

File Complaint or Incident Report: [sc.edu/eop/students.shtml](http://sc.edu/eop/students.shtml)

# Gamecocks do not participate in hazing; they report it.

---

What is Hazing?

Any activity, taken by a group in which prospective or uninitiated members are harassed, intimidated, injured or mentally, physically or emotionally distressed

Is hazing illegal? **Yes.**

Can you be prosecuted? **Yes.**

Can you be expelled from USC for hazing? **Yes.**

Can your organization be disbanded for hazing? **Yes.**

**Are there ways to create group unity without harming individuals?**

**Of course.**

**Build a team through inclusiveness not fear.**

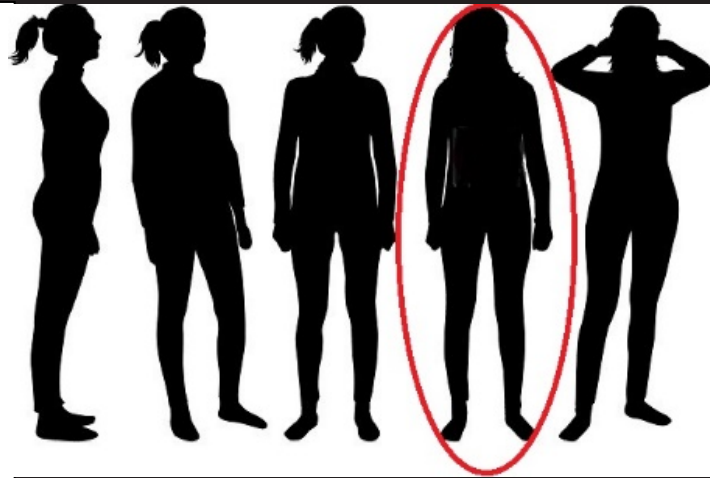


## Know Your Resources

USC Hazing Policy: <http://sc.edu/polcies/ppm/staf305.pdf>

Hazing Hotline: 803-777-5800

File Incident Report: <https://publicdocs.maxient.com/incidentreport.php?UnivofSouthCarolina>



1 out of 5 women are sexually  
assaulted in college.

**Gamecocks commit to stopping all  
sexual assault on campus.**

Gamecocks who have No Limits  
**#KnowTheLimits**

Wondering why  
someone doesn't do  
something?



**You are someone.**  
You do something.

Gamecocks who have No Limits

**#KnowTheLimits**

Gamecocks come in every  
shape, size, color and  
identity.



They are all welcome.

Gamecocks who have No Limits

**#KnowTheLimits**

**Gamecocks do not  
participate in hazing.**



**They report it.**

**Gamecocks who have No Limits**

**#KnowTheLimits**

**Appendix H:**  
**Emergency Management HEAT Map**



High Priority Risk Area:	Student Safety & Crime Prevention										Date of Last Update:				3/15/2018				
Committee:	Carolina Community Coalition										Oversight Committee:				Safety & Security Committee				
Committee Mission:	To create a campus-community environment that promotes healthy and safe behaviors among faculty, staff, students, and community organizations																		
Risk Identification						Assessment					Monitor			Current Risk Controls	Planned Risk Controls	Selected Risk Treatment Primary	Selected Risk Treatment Secondary	External Stakeholders	
Risk Description (if.....)	Risk Type					Risk Benefit (why we do the source activity)	Likelihood	Impact	Initial Score	Control Score	Residual Risk	Executive	Oversight						Primary
	Hazard	Operational	Strategic	Financial	Other														
Substance Use																			
Students misuse alcohol in off campus bars	x				x	Support University operations and protect the health, safety and welfare of the University community	3	2	6	3	3			x	University provided bus transportation; Physical security measures and assessments (design, lighting, call boxes); RAVE guardian; Emergency notification system; Behavioral Intervention Team; Sexual Assault & Violence Intervention & Prevention, bystander intervention training; Substance Abuse Prevention & Education office; Alcohol Edu; Students Taking Initiative & Responsibility; Counseling & Psychiatry; Student Conduct process; parental notification policy; CAAPS; University 101 course presentations & curriculum; Carolina After Dark; Fraternity & Sorority Life hospitalization policy; Fraternity & Sorority event registration; Fraternity & Sorority Life educational programs; City of Columbia nuisance ordinance; public policy engagement and advocacy; partnerships with local agencies and neighborhood associations	Developing strategy for public policy engagement and sharing data; Expanded late-night options for students; Increased student engagement; Social Compact Group recommendations.	Modify Risk		First Responders, Business Owners, Property Owners
Students misuse alcohol in off campus housing	x				x	Support University operations and protect the health, safety and welfare of the University community	3	2	6	3	3			x	University provided bus transportation; Physical security measures and assessments (design, lighting, call boxes); RAVE guardian; Emergency notification system; Behavioral Intervention Team; Sexual Assault & Violence Intervention & Prevention, bystander intervention training; Substance Abuse Prevention & Education office; Alcohol Edu; Students Taking Initiative & Responsibility; Counseling & Psychiatry; Student Conduct process; parental notification policy; CAAPS; University 101 course presentations & curriculum; Carolina After Dark; Fraternity & Sorority Life hospitalization policy; Fraternity & Sorority event registration; Fraternity & Sorority Life educational programs; City of Columbia rental property ordinances; partnerships with local agencies, neighborhood associations, City of Columbia, and law enforcement; neighborhood incident report; USCPD Party Patrols; Off-Campus Student Services programs	Social Compact Group recommendations; developing strategy for public policy engagement and sharing data; Expanded late-night options for students; increased student engagement.	Modify Risk		First Responders, Business Owners, Property Owners

Students misuse alcohol related to athletic events	x				x	Support University operations and protect the health, safety and welfare of the University community	2	2	4	5	-1			x	University policies (STAF 3.02, 4.03, 4.11, 6.26); Department of Law Enforcement & Safety; Sober Tailgate Events; student ticketing policy; multijurisdictional enforcement; Incident Command Center; collaboration between tailgate lot owners/managers and law enforcement; University provided bus transportation; Physical security measures and assessments (design, lighting, call boxes); RAVE guardian; Emergency notification system; Behavioral Intervention Team; Sexual Assault & Violence Intervention & Prevention, bystander intervention training; Substance Abuse Prevention & Education office; Alcohol Edu; Students Taking Initiative & Responsibility; Counseling & Psychiatry; Student Conduct process; parental notification policy; CAAPS; University 101 course presentations & curriculum; Fraternity & Sorority Life: hospitalization policy, event registration and educational programs; neighborhood incident report;	Further collaboration between tailgate lot owners/managers, law enforcement, and university stakeholders	Modify Risk		First Responders, Public
Students misuse alcohol on campus	x				x	Support University operations and protect the health, safety and welfare of the University community	1	2	2	6	-4			x	University policies (STAF 3.02, 4.03, 4.11, 6.26); Department of Law Enforcement & Safety; student and professional live-in staff; Event Registration process; Physical security measures and assessments (design, lighting, call boxes); RAVE guardian; Emergency notification system; Talking points publication; Behavioral Intervention Team; Sexual Assault & Violence Intervention & Prevention, bystander intervention training; Substance Abuse Prevention & Education office; Alcohol Edu; Students Taking Initiative & Responsibility; Counseling & Psychiatry; Student Conduct process; parental notification policy; CAAPS; University 101 course presentations & curriculum; Carolina After Dark; Fraternity & Sorority Life: hospitalization policy, educational programs	Hi,	Modify Risk		First Responders, Parents
Students use illegal substances and misuse prescription drugs	x				x	Support University operations and protect the health, safety and welfare of the University community	2	1	2	2	0			x	University policies (STAF 3.02, 4.03, 4.11, 6.26); Department of Law Enforcement & Safety; Talking points publication; Behavioral Intervention Team; bystander intervention training; Substance Abuse Prevention & Education office; Students Taking Initiative & Responsibility; Counseling & Psychiatry; Student Conduct process; parental notification policy; University 101 course presentations; Student Health Services prescription limit policy and prescription drop box; Fraternity & Sorority Life: hospitalization policy, educational programs		Modify Risk		First Responders, Public, Parents

Continue to make progress. Rebecca Caldwell will send updates next week

2,208 enrolled  
22,550 verified waivers  
345 denied  
290 pending  
75% taken action

Debbie





## **Appendix I:**

### **Programs: Substance Abuse Prevention & Education Blueprint**

EverFi Executive Summaries and longitudinal data has been shared with campus partners and with the Carolina Community Coalition, with a strategic planning session scheduled for June 22<sup>nd</sup>. In order to change this culture and slow the increasing high-risk behavior, we must examine all aspects of our prevention strategy.

#### **Initiative 1.1 Challenges & Opportunities:**

DAODAS funded the CORE survey and experienced several delays in the logistics of paying the CORE Institute, resulting in survey implementation occurring February 13th-March 5th. A low response rate of 4% make the data unusable. However, Student Health Services implemented the ACHA-NCHA during the same time period and the results from that survey should provide guidance for the development of campus-wide strategies.

**Initiative 1.2: Build capacity:** Create a prevention-oriented campus by developing and expanding resources, knowledge, skills, abilities, and improving processes and institutionalization.

#### **Initiative 1.2 Updates:**

Performance evaluations of the four MSW interns indicate they continued to be competent and dedicated throughout the spring semester and increased their skills in a variety of areas. Our staff spent time this semester creating and recruiting for additional opportunities for graduate interns, to include four STIR Coaches, a STIR Evaluator, an Outreach & Education intern, and a Gamecock Recovery intern. This 75% increase in graduate staff should increase our capacity as an office and provide additional opportunities for interns in programs other than Social Work. In addition, we are restarting a peer education program with the goal of expanding our capacity for outreach and education.

We significantly expanded our recruitment efforts for both graduate interns and peer educators, recruiting through academic programs in social work, public health, counseling, psychology, and higher education as well as through staff and organizations in Fraternity and Sorority Life, Student Government, and Housing. We have recruited MSW interns for six of the seven graduate positions and nine undergraduate students for SAPE Peers and Greeks for SAPE.

One of our biggest accomplishments this year has been our increased collaborative efforts with a variety of partners to improve AlcoholEdu efficiency, facilitate collaborative presentations and programs, implement Coalition efforts, integrate mental health screening into STIR, and develop the Recovery Community. Key stakeholders have included Academic Advising, College of Social Work, Carolina After Dark, Healthy Carolina Initiatives, Fraternity & Sorority Life, Leadership & Service, SAVIP, Student Conduct Office, Student Success Center, Study Abroad, and University 101. As an example, 74% of the programs and presentations offered by SAPE this spring included a campus or community partner.

Increasing student participation in prevention has been a focus for this year, with successes including the formation of a Student Advisory Board for SAPE and Healthy Carolina, the development of a SAPE peer education program, engaging fraternity and sorority leaders in conversations about risk management, and a student presenter at a Coalition meeting. This will continue to be a focus for the fall.

The Coalition held five monthly meetings with an average of 15 participants, six steering committee meetings with an average of eight participants, and 12 workgroup meetings with an average of five participants this semester. We have focused monthly Coalition meetings on topics that expand the

knowledge and resources of the group and developed workgroup projects that have realistic, specific, short-term goals.

#### **Initiative 1.2 Challenges & Opportunities:**

As our student staff increases, our professional staff will need to develop skills and dedicated time to their supervision. With two undergraduate Social Work interns this year, we have recognized the need to develop tasks that are more specific and provide more direction for undergraduate students. As we expand our student staff and broaden the opportunities for graduate interns, we will be challenged to manage them appropriately.

Coalition participation continues to be a challenge, especially engaging neighbors, community members, entertainment district representatives, and campus partners who are not directly impacted by student behavior. Focusing the monthly meeting topics has allowed us to have more informed conversations about high-risk behavior, but we need to outreach to individuals and groups to ensure their representation. Shifting to a workgroup structure should continue to help improve participation in both projects and meetings.

**Initiative 1.3: Conduct Strategic Planning and Strategy Implementation:** Strategic planning will be conducted to identify and prioritize problem areas, determine root causes and contributing local factors, develop SMART goals, and select best fit strategies to address the issues

#### **Initiative 1.3 Updates:**

The Carolina Community Coalition undertook a significant strategic planning process in the fall resulting in the development of several focused workgroups in place of the larger subcommittees. This new structure also aided us in recruiting new members interested in working on specific projects. The three main workgroups are Merchant Education, Entertainment District Outreach, and Laws & Enforcement. Priorities include researching and developing training for establishment servers and staff; reaching out to establishment owners and managers, and entertainment district representatives; and researching strategies for supporting law enforcement and sharing data. Workgroups met a total of twelve times with an average of five participants and the Coalition partnered with STSM to train over 40 volunteers who canvassed over 50 establishments in Five Points and the Vista to recruit participants for the Bar Outreach Project training.

The SAPE staff worked to define priority goals and focused on expanding our influence and effectiveness through marketing, relationship building, and collaborative partnerships. We also worked to increase our capacity by developing a peer education program and increasing our graduate intern staff by 75% with additional positions in Outreach & Education, Gamecock Recovery, and STIR Evaluation.

The EverFi Diagnostic Inventory Assessment was completed by the SAPE Director and CCC Steering Committee in April and May and we are eagerly anticipating the recommendations in late June.

#### **Initiative 1.3 Challenges & Opportunities:**

A SCCADVASA Bar Outreach Project Training attended by SAPE and SAVIP staff provided an excellent model to follow for our spring goals and formed the basis for our partnership with Sexual Trauma Services of the Midlands. While initial interest seemed promising, we have not been able to gain commitment for a training from any of the establishments. Strategic plans for next year must include the continued dedication to recruiting and marketing the bystander training for bar staff and building relationships with our entertainment districts.

**Goal No. 2: Educate students, faculty and staff on risk reduction techniques through educational outreach.**

**Initiative 2.1: Increase awareness of SAPE Office in order to become the primary campus resource related to alcohol, other drugs, substance abuse and recovery.**

**Initiative 2.1 Updates**

This spring, SAPE staff conducted 34 presentations for over 1700 faculty, staff, and students, bringing the total for the year to 72 presentations for over 2500 people. This is a 128% increase in presentations and 160% increase in participation compared to last year, which validates the potential impact when the office is fully staffed. We also expanded outreach efforts by partnering with Student Health Services in several tabling programs designed to promote risk reduction messages before high-risk times, including Spring Break, St. Patrick's Day, and finals, with food and educational materials distributed to over 850 students.

59% of the presentations were requested from academic departments and organizations including Fraternity and Sorority chapters and resident mentors. SAPE staff provided an overview of campus data to the MyCarolina Alumni Association staff, Office of Student Conduct hearing officers, and Student Health Services Administrative Council, and discussed how to recognize and refer a student with problematic use with Changing Carolina Peer Leaders, FSL Property Managers, Student Success Center Advisors, and Study Abroad faculty and staff. These requests should increase as awareness of the SAPE office and our expertise increases.

**Initiative 2.1 Challenges & Opportunities:**

As we work towards achieving the goal of increasing awareness of our office and the resources we offer, requests for presentations, programs, and consultations will only increase. We must increase our capacity to meet these needs through well-trained and supervised peer educators and intern staff as well as collaborative programs with campus partners.

**Initiative 2.2 Increase on-time completion of Alcohol Edu (and Haven):** These online programs are required for all students under age 23 before and during their first semester at the University.

**Initiative 2.2 Updates**

Increasing the on-time completion of Alcohol Edu (and Haven) was a major focus for the year, with an emphasis on communicating deadline information to students in a variety of ways. In addition to including information in presentations for parents, student leaders, and new students, marketing materials were distributed through Gamecock Gateway, Student Success Center, University 101 Instructors, Parents Programs, and the International Accelerator Program. This spring, 180 additional students met the April deadline and only 200 students had registration holds implemented. The volume of calls and emails concerning registration holds dropped by 57%, from 266 contacts in Spring 2016 to 114 in Spring 2017.

**Initiative 2.2 Challenges & Opportunities:**

Communicating information about the deadline, especially to transfer students, continues to be a challenge as well as responding to the volume of calls and emails from students who have not met the deadline. We must continue to develop a communication strategy for faculty, staff, and student leaders who have extensive contact with new students in addition to the students themselves.



**Initiative 2.3 Update the Alcohol Policy Workshop and Alcohol Event Approval process:** This workshop is designed to give participants an understanding of the campus Alcohol Policy as well as the skills necessary to intervene in situations where alcohol is being misused. The training is offered to students, staff and faculty and fulfills the requirement for approval of on-campus alcohol events.

#### **Initiative 2.3 Updates**

SAPE replaced the former TIPS Training with a campus-designed Alcohol Policy Workshop in the fall, allowing us to better meet the needs of the academic department representatives who compose most of the participants. We offered six workshops this spring for 34 participants, including students, property managers, and faculty and staff. Participants continued to retain knowledge from the workshop, with an average score of 76% on the direct assessment, and provided useful feedback to suggest ways to improve content retention.

Fifty-three alcohol event registration forms were submitted this spring, bringing our total for the year to 113 forms, a 28% increase from 2015-2016. Most of the forms (96%) were approved, with an average of 2.5 days between submission and approval. Two events were not approved: one was cancelled by the sponsor and the other decided not to serve alcohol after understanding the liability involved. Academic departments sponsored 80% (41/51) of these events, with the Darla Moore School of Business sponsoring the most at 17.

We piloted an online event registration form this spring, which accounts for much of the increased efficiency and fewer days between submission and approval. We will continue to develop the online form so that it meets the needs of all of sponsoring organizations and market the form to sponsoring organizations to aid in efficiency.

#### **Initiative 2.3 Challenges & Opportunities:**

Sodexo was the caterer for 93% of the on-campus events, so we will be reaching out to the new campus catering service in the late summer in order to educate their staff on the event registration process. We are also exploring what methods other university use to manage liability for on-campus events to benchmark our process.

**Goal #3: Facilitate changes in risky behaviors and negative consequences associated with alcohol and other drug use:** The SAPE Office will utilize a variety of environmental management strategies, institutional policies and practices, group and individual approaches to impact student behavior.

#### **Initiative 3.1 Continue to develop the STIR Program (Students Taking Initiative and Responsibility):**

STIR is a brief motivational interviewing intervention that assists students with reducing risk behaviors

#### **Initiative 3.1 Updates**

A total of 219 students completed STIR this year with an additional 35 students scheduled to complete the program in the fall. Fifteen students did not complete the program and 27 were referred for significant drug use or mental health concerns. The STIR program remains incredibly effective on students' behavior, with an 85% increase in students who report abstaining from alcohol use on the exit survey as well as reductions in the average number of days per month that students report drinking (from 4.75 to 3.4) and the average number of drinks per occasion (decreased by 25% from 4.2 to 3.3). Students also report an 86% decline in past month marijuana use and, among those still using marijuana, reduction from 8.5 to 5.2 use days per month. In addition to reducing use, STIR participants

also report substantive declines in their use related consequences and significant increases in their use of risk reduction strategies.

In an effort to better manage students who are transported to the hospital due to their alcohol or drug use, we partnered with the Office of Student Conduct and the Counseling Center to develop a streamlined process for assessing the needs of those students. Starting in March, hospitalized students came for a SAPE Assessment within 48 hours of their conduct hearing, allowing us to refer them to STIR, the Counseling Center, or to an off-campus resource quickly. We used a similar model to assess students at the end of the semester, resulting in 35 students who are scheduled to start STIR in the fall but did not have to wait all summer for their initial screening.

STIR developed a process to accept non-conduct referrals this fall and received 8 referrals from parents, Psychiatry, or their attorney with limited marketing of this opportunity. To help raise awareness of this resource, SAPE staff facilitated presentations about recognizing a problem and referring a student for advisors in the Student Success Center, the Changing Carolina Peer Leaders, FSL Property Managers, Student Health Services Administrative Council, and Study Abroad faculty and staff.

The CAAPS class is a partnership between the Office of Student Conduct and SAPE as a sanction for students who have a first alcohol violation. SAPE interns co-facilitated 26 classes with graduate students from OSC.

STIR Coaches have been trained to utilize the Personal Health Questionnaire (PHQ9), which provides additional mental health screening, allows deeper discussion with the students about their concerns and campus resources, and will deliver important data on the intersection of students' substance use and mental health.

### **Initiative 3.1 Challenges & Opportunities**

Hiring an Assistant Director to manage the STIR program is a priority for this summer, with the goal of having someone in place in August. Training for the new STIR Coaches and the Assistant Director, is under development and will be a focus to ensure new staff is ready for students in the fall.

### **Initiative 3.2: Provide leadership and support for the strategic work of the Carolina Community Coalition**

#### **Initiative 3.2 Updates**

Priorities for the Carolina Community Coalition this spring include researching and developing training for establishment servers and staff; reaching out to establishment owners and managers, and entertainment district representatives; and researching strategies for supporting law enforcement and sharing data. Workgroups met a total of twelve times with an average of five participants, held two volunteer trainings with over 40 participants, and canvased over 50 establishments in Five Points and the Vista to recruit participants for the Bar Outreach Project training.

#### **Initiative 3.2 Challenges & Opportunities:**

A SCCADVASA Bar Outreach Project Training attended by SAPE and SAVIP staff provided an excellent model to follow for our spring goals and formed the basis for our partnership with Sexual Trauma Services of the Midlands. While initial interest seemed promising, we have not been able to gain commitment for a training from any of the establishments. Strategic plans for next year must include

the continued dedication to recruiting and marketing the bystander training for bar staff and building relationships with our entertainment districts.

**Initiative 3.3: Provide leadership and support for attractive alternative social events on campus, with a focus on Game Days and other high-risk times (Halloween, Homecoming, St. Patrick's Day, etc).**

#### **Initiative 3.3 Updates**

Carolina After Dark and SAPE co-sponsored a basketball viewing party in January. We also expanded outreach efforts by partnering with Student Health Services in several tabling programs designed to promote risk reduction messages before high-risk times, including Spring Break, St. Patrick's Day, and finals, with food and educational materials distributed to over 850 students. In addition, two housing programs helped educate freshman about harm reduction strategies for spring break.

#### **Initiative 3.3 Challenges & Opportunities:**

Plans are underway for fall tailgates before home football games, funded through our NCAA Choices grant. Since this is the last year of funding for this grant, we are exploring other avenues of funding for the fall including sponsorship by local apartment complexes and support from campus partners such as Carolina After Dark.

**Goal #4: Develop, coordinate, and manage prevention messages throughout the Carolina community and to stakeholders in order to influence culture and promote health and safety**

**Initiative 4.1 Maintain social media web presence for the SAPE office, Carolina Community Coalition, and overall prevention initiatives to ensure that students, faculty, staff, and parents stay informed about current, relevant substance abuse topics, trends, and available resources**

#### **Initiative 4.1 Updates**

SAPE website was updated monthly to provide updated information and schedule for the revised Alcohol Policy Workshops, and update AlcoholEdu & Haven FAQ to include more detailed information for parents as well as instructions on how to preview each module.

SAPE increased our social media presence, with approximately 300 prevention messages this semester and an 8% increase in followers. Gamecock Recovery had a 10% increase in followers and page likes and messages communicated information about Gamecock Recovery events, recovery support, and fun, sober activities in Columbia.

#### **Initiative 4.1 Challenges & Opportunities**

The biggest challenge for our social media presence is staff time to maintain the communication. We are utilizing Hootsuite, a free online tool, and trained student interns to take a larger role in finding relevant articles and resources to post.

**Initiative 4.2: Communicate prevention messages to faculty, staff, and parents to shape campus culture and individual student behavior.**

#### **Initiative 4.2: Updates**

SAPE staff provided an overview of campus data to the MyCarolina Alumni Association staff, Office of Student Conduct hearing officers, and Student Health Services Administrative Council, and discussed how to recognize and refer a student with problematic use with Changing Carolina Peer Leaders, FSL

Property Managers, Student Success Center Advisors, and Study Abroad faculty and staff. These conversations help shape campus culture and recognition of high risk behavior by faculty and staff.

This spring, SAPE staff worked with ten parents looking for resources for their student: six who had concerns about their student's high risk behavior, four seeking information about STIR, and three looking for recovery support.

#### **Initiative 4.2 Challenges & Opportunities**

As awareness of our staff expertise grows, we must capitalize on interest in addressing this issue and concerns about students that arise from faculty, staff and parents. We are developing a standard presentation to educate the campus community on how to recognize and refer a student with problematic use that we hope to market broadly.

#### **Initiative 4.3 Develop SAPE staff expertise and serve as nationally recognized leaders in college prevention**

##### **Initiative 4.3 Updates**

SAPE professional staff have focused on leadership training and building relationships across campus. Staff have participated in the LEAD series, Bar Outreach Project Canvassing Training, Person-centered Evaluation Workshop, IdeaPop, Southeastern Student Conduct Institute, Mental Health Council, Critical Incident Investigation Team, and webinars from the Cannabis Learning Community, SAMHSA, and EverFi. All professional and most student staff have completed the Stand Up Carolina Workshop and Suicide Prevention Gatekeeper Training.

SAPE staff represented the university at the NASPA Strategies Meeting, presented on marijuana at the BACCHUS Initiatives of NASPA Region III Spring Conference, and presented on motivational interviewing and marijuana at the National Association of Social Workers South Carolina Spring Symposium.

SAPE staff hold leadership positions as the Central Unit Representative to the National Association of Social Workers- South Carolina Chapter and the Region III Consultant for the BACCHUS Initiatives of NASPA.

##### **Initiative 4.3 Challenges & Opportunities**

The SAPE Director will be attending the EverFi National Prevention Summit in June along with the Associate Director for SAVIP and an Assistant Director from Housing & Residence Life. We are excited about the ideas this team will bring back for our campus. Increasing the competency and knowledge of SAPE staff will continue to be a priority next year, especially for our new staff member.

**Appendix J:**

**Copy of Everfi Alcohol Diagnostic Inventory Recommendation Reports**

# Department of Student Life Blueprint

## SECTION 1: PURPOSE, FOUNDATION AND EXECUTIVE SUMMARY

**\*Reporting Unit:**

**Reporting Period:** 2017-2018

**\*Mission Statement:** A statement that concisely describes what the unit does (its unique role), who it serves and the results it intends to achieve (50 word max).

**\*Vision Statement, Values or Commitments (Optional)**

### PROMPTS

*Please provide a brief, concise response to the following prompts (100 word limit each)*

**\*Strengths and important accomplishments in FY18**

1.

2.

3.

4.

**\*Weaknesses and plans for improvement - FY18 to FY19**

1.

2.

3.

4.

**\*Key issues/challenges anticipated for the unit in FY19**

1.

2.

3.

4.

**\*Most effective programs/initiatives toward fulfillment of mission in FY18. Provide the name of the program/initiative and a very brief statement about the effectiveness.**

1.

2.

3.

4.

**\*Current Innovations in Program Delivery Methods for FY18. Provide name and a very brief description.**

1.

2.

3.

4.

**\*Contingencies Managed: Provide a very brief description of the issue and how it was resolved in FY18.**

1.

2.

3.

4.

**\*Resources needed in FY19 (describe specific purposes):**

1.

2.

3.

4.



## SECTION 2: ALIGNMENT AND PROGRESS

**\*How does the work of this unit align with university goals (select primary goal alignment):**

Educating the Thinkers and Leaders of Tomorrow: Student recruitment; enrollment; and transition into, through and out of the university.

Educating the Thinkers and Leaders of Tomorrow: Student persistence and progress towards a degree

Educating the Thinkers and Leaders of Tomorrow: Advancing students' civic engagement and citizenship

Educating the Thinkers and Leaders of Tomorrow: Developing future leaders

Assembling and Supporting World Class Faculty

Spurring Innovation, Creative Expression and Community Engagement

Building Inclusive and Inspiring Communities

Demanding Institutional Excellence

Not Applicable

**\*Overall, to what extent did the unit fulfill its mission in the reporting period (FY18)?**

## SECTION 3: FY18 GOALS, ASSESSMENT AND ANALYSIS

*This section focuses on the intended outcomes associated with the unit's core functions*

### **GOAL 1:**

**\*Please state the goal using the format: What the unit does, who it serves and the desired results (intended outcome):**

**\*Intended Outcome – specific results the unit intends to achieve through this core function activity**

### **KEY PERFORMANCE INDICATORS (KPI) FOR GOAL 1:**

**\*Indicator 1:**

**\*Result:**

**\*Assessment Method (how the indicator data is obtained):**

**\*Indicator 2:**

**\*Result:**

**\*Assessment Method (how the indicator data is obtained):**

**\* Indicator 3:**

**\* Result:**

**\* Assessment Method (how the indicator data is obtained):**

**Indicator 4:**

**Result:**

**Assessment Method (how the indicator data is obtained):**

**\* Describe any prior year action (FY17) to improve achievement of this intended outcome:**

**\* Provide analysis of goal achievement across all indicators for this year (FY18):**

**\* Describe improvement plans based on your analysis for the coming year (FY19):**

## INITIATIVES

**Enter information for New, Modified or Ended Initiatives :**

**Name of Initiative/Program:**

**Initiative Information: For New and Modified Initiatives, describe purpose, what will be done and the intended results. For Ended Initiatives, state why it was ended and any implications.**

**Enter information for New, Modified or Ended Initiatives :**

**Name of Initiative/Program:**

**Initiative Information: For New and Modified Initiatives, describe purpose, what will be done and the intended results. For Ended Initiatives, state why it was ended and any implications.**

**Enter information for New, Modified or Ended Initiatives :**

**Name of Initiative/Program:**

**Initiative Information: For New and Modified Initiatives, describe purpose, what will be done and the intended results. For Ended Initiatives, state why it was ended and any implications.**

## **GOAL 2:**

**\*Please state the goal using the format: What the unit does, who it serves and the desired results (intended outcome):**

**\*Intended Outcome – specific results the unit intends to achieve through this core function activity**

### **KEY PERFORMANCE INDICATORS (KPI) FOR GOAL 2:**

**\*Indicator 1:**

**\*Result:**

**\*Assessment Method (how the indicator data is obtained):**

**\*Indicator 2:**

**\*Result:**

**\*Assessment Method (how the indicator data is obtained):**

**\*Indicator 3:**

**\*Result:**

**\*Assessment Method (how the indicator data is obtained):**

**Indicator 4:**

**Result:**

**Assessment Method (how the indicator data is obtained):**

**\*Describe any prior year action (FY17) to improve achievement of this intended outcome:**

**\*Provide analysis of goal achievement across all indicators for this year (FY18):**

**\*Describe improvement plans based on your analysis for the coming year (FY19):**

## INITIATIVES

**Enter information for New, Modified or Ended Initiatives :**

**Name of Initiative/Program:**

**Initiative Information: For New and Modified Initiatives, describe purpose, what will be done and the intended results. For Ended Initiatives, state why it was ended and any implications.**

**Enter information for New, Modified or Ended Initiatives :**

**Name of Initiative/Program:**

**Initiative Information: For New and Modified Initiatives, describe purpose, what will be done and the intended results. For Ended Initiatives, state why it was ended and any implications.**

**Enter information for New, Modified or Ended Initiatives :**

**Name of Initiative/Program:**

**Initiative Information: For New and Modified Initiatives, describe purpose, what will be done and the intended results. For Ended Initiatives, state why it was ended and any implications.**

### **GOAL 3:**

**\*Please state the goal using the format: What the unit does, who it serves and the desired results (intended outcome):**

**\*Intended Outcome – specific results the unit intends to achieve through this core function activity**

### **KEY PERFORMANCE INDICATORS (KPI) FOR GOAL 3:**

**\*Indicator 1:**

**\*Result:**

**\*Assessment Method (how the indicator data is obtained):**

**\*Indicator 2:**

**\*Result:**

**\*Assessment Method (how the indicator data is obtained):**



**\*Indicator 3:**

**\*Result:**

**\*Assessment Method (how the indicator data is obtained):**

**Indicator 4:**

**Result:**

**Assessment Method (how the indicator data is obtained):**

**\*Describe any prior year action (FY17) to improve achievement of this intended outcome:**

**\*Provide analysis of goal achievement across all indicators for this year (FY18):**

**\*Describe improvement plans based on your analysis for the coming year (FY19):**

## INITIATIVES

**Enter information for New, Modified or Ended Initiatives :**

**Name of Initiative/Program:**

**Initiative Information: For New and Modified Initiatives, describe purpose, what will be done and the intended results. For Ended Initiatives, state why it was ended and any implications.**

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**Enter information for New, Modified or Ended Initiatives :**

**Name of Initiative/Program:**

**Initiative Information: For New and Modified Initiatives, describe purpose, what will be done and the intended results. For Ended Initiatives, state why it was ended and any implications.**

## **GOAL 4:**

Please state the goal using the format: What the unit does, who it serves and the desired results (intended outcome):

**Intended Outcome – specific results the unit intends to achieve through this core function activity**

### **KEY PERFORMANCE INDICATORS (KPI) FOR GOAL 4:**

#### **Indicator 1:**

**Result:**

**Assessment Method (how the indicator data is obtained):**

#### **Indicator 2:**

**Result:**

**Assessment Method (how the indicator data is obtained):**

**Indicator 3:**

**Result:**

**Assessment Method (how the indicator data is obtained):**

**Indicator 4:**

**Result:**

**Assessment Method (how the indicator data is obtained):**

**Describe any prior year action (FY17) to improve achievement of this intended outcome:**

**Provide analysis of goal achievement across all indicators for this year (FY18):**

**Describe improvement plans based on your analysis for the coming year (FY19):**

## INITIATIVES

**Enter information for New, Modified or Ended Initiatives :**

**Name of Initiative/Program:**

**Initiative Information: For New and Modified Initiatives, describe purpose, what will be done and the intended results. For Ended Initiatives, state why it was ended and any implications.**

**Enter information for New, Modified or Ended Initiatives :**

**Name of Initiative/Program:**

**Initiative Information: For New and Modified Initiatives, describe purpose, what will be done and the intended results. For Ended Initiatives, state why it was ended and any implications.**

**Enter information for New, Modified or Ended Initiatives :**

**Name of Initiative/Program:**

**Initiative Information: For New and Modified Initiatives, describe purpose, what will be done and the intended results. For Ended Initiatives, state why it was ended and any implications.**

## **GOAL 5:**

Please state the goal using the format: What the unit does, who it serves and the desired results (intended outcome):

**Intended Outcome – specific results the unit intends to achieve through this core function activity**

### **KEY PERFORMANCE INDICATORS (KPI) FOR GOAL 5:**

#### **Indicator 1:**

**Result:**

**Assessment Method (how the indicator data is obtained):**

#### **Indicator 2:**

**Result:**

**Assessment Method (how the indicator data is obtained):**

**Indicator 3:**

**Result:**

**Assessment Method (how the indicator data is obtained):**

**Indicator 4:**

**Result:**

**Assessment Method (how the indicator data is obtained):**

**Describe any prior year action (FY17) to improve achievement of this intended outcome:**

**Provide analysis of goal achievement across all indicators for this year (FY18):**

**Describe improvement plans based on your analysis for the coming year (FY19):**

## INITIATIVES

Enter information for New, Modified or Ended Initiatives :

Name of Initiative/Program:

Initiative Information: For New and Modified Initiatives, describe purpose, what will be done and the intended results. For Ended Initiatives, state why it was ended and any implications.

Enter information for New, Modified or Ended Initiatives :

Name of Initiative/Program:

Initiative Information: For New and Modified Initiatives, describe purpose, what will be done and the intended results. For Ended Initiatives, state why it was ended and any implications.

Enter information for New, Modified or Ended Initiatives :

Name of Initiative/Program:

Initiative Information: For New and Modified Initiatives, describe purpose, what will be done and the intended results. For Ended Initiatives, state why it was ended and any implications.



## SECTION 4: ADDITIONAL INFORMATION - FY18

**Engaged Learning Opportunities for Undergraduates.** Describe your unit's initiatives, improvements, challenges, and progress with Engaged Learning Opportunities at the Undergraduate level (max 50 words).

**Engaged Learning Opportunities for Graduates.** Describe your unit's initiatives, improvements, challenges, and progress with Engaged Learning Opportunities at the Graduate level (max 50 words).

**Reputation Enhancement.** Describe your unit's contributions and achievements that enhance the reputation of USC Columbia regionally and nationally (max 50 words).

**Internal Collaborations.** List your unit's most significant collaborations and multidisciplinary efforts that are internal to the University. Details should be omitted; list by name only (max 50 words).

**External Collaborations.** List your unit's most significant collaborations and multidisciplinary efforts that are external to the University. Details should be omitted; list by name only (max 50 words).

**Campus Climate - Diversity and Inclusion.** Describe activities your unit conducted within the FY18 that were designed to improve campus climate and inclusion (max 50 words).

**Cool Stuff** - Describe other innovations not previously reported.

## AWARDS RECEIVED DURING FY18

**Recipient Name:**

**Department Name:** Student Life

**Region (example: Southeastern, South, North, International):**

**Award Title:**

**Awarding Organization:**

**Recipient Name:**

**Department Name:** Student Life

**Region (example: Southeastern, South, North, International):**

**Award Title:**

**Awarding Organization:**

**Recipient Name:**

**Department Name:** Student Life

**Region (example: Southeastern, South, North, International):**

**Award Title:**

**Awarding Organization:**

**Recipient Name:**

**Department Name:** Student Life

**Region (example: Southeastern, South, North, International):**

**Award Title:**

**Awarding Organization:**

**Appendix J:**

**Copy of Everfi Alcohol Diagnostic Inventory Recommendation Reports**



# Campus Alcohol Prevention Feedback Report

University of South Carolina

June 2017

## Introduction

This feedback report provides an overview of the University of South Carolina's areas of strength and areas for advancement in four key areas: programming; policy; critical processes; and institutionalization. The report is based on information provided by University of South Carolina administrators through completion of EverFi's Alcohol Diagnostic Inventory (ADI): a comprehensive 200-item assessment of an institution's alcohol prevention efforts. It is meant to serve as a roadmap to guide progress in alcohol prevention on your campus.

In addition, this report offers a benchmark to enable the University of South Carolina to identify progress against other institutions that have been similarly assessed. Please refer to *Appendix I: Benchmarking the University of South Carolina Against Other Coalition Campuses* for a graphical comparison of the University of South Carolina's alcohol prevention work compared to other Coalition institutions that have completed the Diagnostic Inventory process.



### SAMPLE QUESTIONS FROM THE ALCOHOL DIAGNOSTIC INVENTORY

- *What are the primary components of your alcohol prevention programming?*
- *Is your institution performing a lot of activities with limited reach, or is it employing targeted efforts that cover the span of universal, selective, and indicated programming?*
- *Does your institution require that parties, functions and events be registered with the institution?*
- *Does your institution possess statistics on the percentage of your students who do not drink?*
- *Do you have specific, quantifiable goals for your alcohol prevention efforts?*
- *Has your institution identified key indicators of student health? Does your institution regularly measure and report these key indicators with those who can influence change?*
- *Do individuals or departments outside of Student Affairs play a role in achieving your institution's prevention objectives?*



### KEY AREAS ASSESSED

#### Programming

The scope and impact of current prevention programming

#### Critical Processes

The adherence to processes deemed critical to success in alcohol prevention

#### Policy

Effectiveness of campus alcohol policies related to their enforcement and adjudication

#### Institutionalization

The degree of institutional support for alcohol prevention and the extent of relationships that exist with a variety of constituencies that are essential to prevention success

## Executive Summary

## PROGRAMMING

UNIVERSITY OF SOUTH CAROLINA	2011: D	2017: B-
UNIVERSAL:	2011: C-	2017: B+
SELECTIVE:	2011: D	2017: C+
INDICATED:	2011: F	2017: B-

## POLICY

UNIVERSITY OF SOUTH CAROLINA	2011: C+	2017: B
WRITTEN:	2011: C+	2017: C+
ENFORCED:	2011: C-	2017: C-
ADJUDICATED:	2011: C	2017: A+

## CRITICAL PROCESSES

UNIVERSITY OF SOUTH CAROLINA	2011: C	2017: B+
DATA RELIANCE:	2011: C	2017: C+
PLANNING:	2011: C-	2017: A+
POLICY REVIEW:	2011: C+	2017: D-

## INSTITUTIONALIZATION

UNIVERSITY OF SOUTH CAROLINA	2011: C-	2017: B
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## Recommendations and Action Steps: *Programming*

The scope and impact of current prevention programming was assessed based on the following:

- Number of program types: Universal, Selective, Indicated<sup>1</sup>
- Frequency of programming
- Synergy of programming efforts
- Theoretical underpinnings

### AREAS OF STRENGTH

1. Good variety of evidence-based approaches targeting universal, selective, and indicated populations. AlcoholEdu for College, bystander intervention training, and BASICS help to support the adoption of healthy behaviors.
2. Use of trained and supervised peer educators to deliver messages related to alcohol prevention. Peer educators play many roles, such as developing materials, facilitating workshops, planning awareness campaigns and campus-wide events, and participating in policy review.
3. USC is in the process of building recovery support services through an established CRP.

### AREAS FOR ADVANCEMENT

1. Discontinue ineffective programs. Though USC has discontinued Alcohol Awareness Week since completing the Diagnostic Inventory in 2011, administrators continue to bring invited speakers to campus and participate in tabling for prevention. These programs have no demonstrated efficacy in the research literature and no theoretical basis for behavior change. It can, however, be used to enhance other efforts, as long as the focus remains on more effective strategies.
2. Though USC implements bystander intervention to target high-risk populations, best practice recommends utilizing at least two efficacious selective programs in order to vary methods of program delivery to accommodate multiple learning styles. Small group social norms and Group Motivational Enhancement have a strong basis in the research literature.
3. USC offers monthly alcohol-free events and activities, but can continue to expand alcohol-free social and recreational offerings through providing open settings for students to gather informally and create needs-driven social spaces. For these options to be effective, they must be provided on a regular basis, in a designated location, and occur between the hours of 10pm and 2am. Creating an effective and innovative strategy for communicating these opportunities is key to institutionalization of such efforts.

<sup>1</sup> In a 1994 report, the Institute of Medicine proposed a framework for classifying prevention based on Gordon's (1987) operational classification of disease prevention. The IOM model divides the continuum of services into three parts: prevention, treatment, and maintenance. The prevention category is divided into three classifications--*universal*, *selective*, and *indicated* prevention. For more information, visit <http://cymcdn.com/sites/www.myprevention.org/resource/collection/8cc9c598-ef77-4cdb-a2df-88ab150a4832/25EIOMModel.pdf>



## Recommendations and Action Steps: *Policy*

The strength and effectiveness of campus alcohol policies, enforcement, and adjudication efforts are assessed based on the following:

- Written alcohol policy
- Practices around sale and marketing of alcohol on campus
- Event registration and hosting
- Policy enforcement
- Adjudication/sanctions processes

### AREAS OF STRENGTH

1. Since completing the Alcohol Diagnostic Inventory in 2011, USC has required that fraternities and sororities implement responsible beverage service at events.
2. USC now requires that on-campus social functions be registered, an area identified in the 2011 Diagnostic as needing improvement.
3. Feedback collected in the Diagnostic indicates that students at the University of South Carolina are held to the same policy standards “most of the time.” Administrators also report consistent sanctions for alcohol violations.

### AREAS FOR ADVANCEMENT

1. Administrators have indicated that tailgate, pre- and post-game parties create very serious problems for the institution. USC should consider implementing additional policies that have increased stakes for game day violations, i.e., any pre- or post-game violations result in stricter sanctions, such as loss of game day privileges.
2. Best practice recommends that when law/policy enforcement is planned, efforts should be publicized in advance.
3. Once law/policy enforcement takes place, citations/violations should be publicized.

## Recommendations and Action Steps: *Critical Processes*

Adherence to processes deemed critical to success in alcohol prevention are assessed based on the following:

- Collection and utilization of key data sources for program design/delivery
- Goal-setting and strategic planning
- Evaluation and assessment of prevention efforts
- Compliance with EDGAR part 86 (DFSCA)
- Review and revision of policy
- Sharing of progress indicators and reports

### AREAS OF STRENGTH

1. A variety of resources and data are being collected to evaluate alcohol prevention efforts. This is an area of significant improvement from 2011.
2. The University of South Carolina measures intended outcomes for prevention programs. Outcomes are based on unique program activities; student needs assessment, strategic planning goals, and validated evaluation tools.
3. In 2011, USC had not engaged in a formal strategic planning process to inform and guide campus prevention efforts. In 2017, administrators report having developed a strategic plan within the past year.

### AREAS FOR ADVANCEMENT

1. Although the University of South Carolina does have an alcohol and other drugs policy report as required by federal regulations outlined in EDGAR Part 86, the report is over 2 years old and therefore does not meet the standards of compliance. Administrators should utilize Alcohol Diagnostic Inventory results to create an updated AOD policy report to be included as part of the biennial review in order to remain in compliance.
2. USC completes a comprehensive review and examination of its alcohol policies every three-to-five years. Administrators should look to undertake opportunities to review and plan on a more regular basis, which will assist in keeping up to date with federal regulations.

## Recommendations and Action Steps: *Institutionalization*

The degree of institutional support for alcohol prevention and the extent of relationships that exist with a variety of constituencies essential to prevention success is measured based on the following:

- Total FTE: prevention staff
- Total budget for prevention
- Outward commitment to prevention from senior leaders
- Inclusion of student health and safety in institutional strategic plan, mission/vision statements
- Level of institution-wide understanding and buy-in for evidence-informed prevention
- Existence of a task force or working group and level of progress toward stated goals

### AREAS OF STRENGTH

1. Both the President and Vice President of Student Affairs have communicated publicly about the issue of alcohol on multiple occasions.
2. The University of South Carolina has articulated specific, measurable goals for improving student health and wellness.
3. USC has an established forum to engage stakeholders in alcohol prevention efforts.

### AREAS FOR ADVANCEMENT

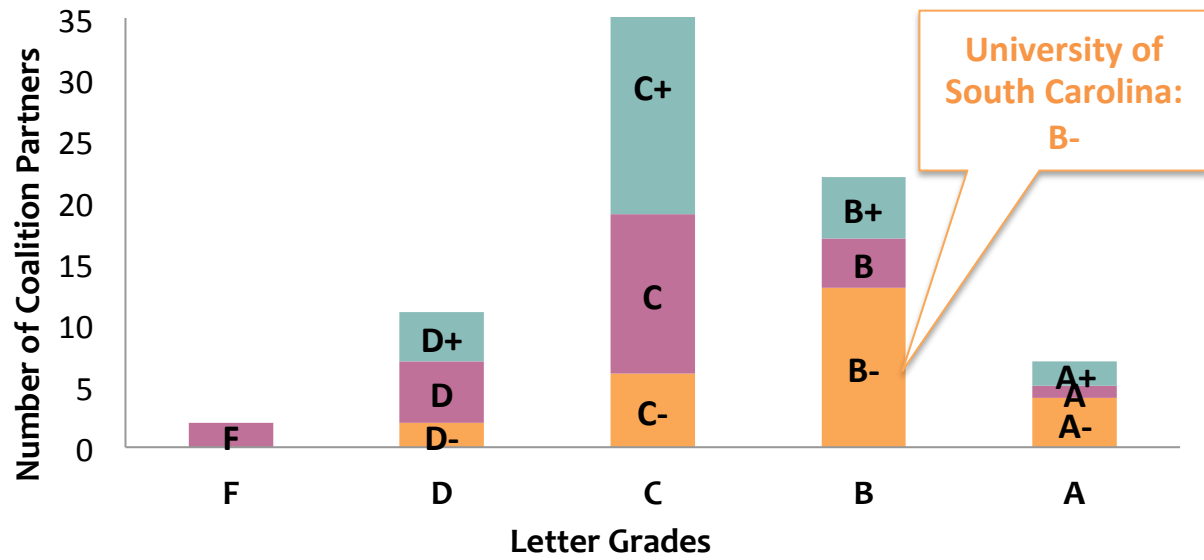
1. **Funding**  
Currently, USC spends approximately \$2.77 per student on alcohol prevention compared to the national Diagnostic average of \$4.38 per student. Administrators can evaluate the total cost of alcohol on the institution and estimate the cost savings opportunity from improvement in alcohol prevention by filling out the *EverFi Coalition Cost Calculator and Alcohol-Related Attrition Calculator*. This data can be used as a powerful lever for gaining support for alcohol prevention from key stakeholders across campus.
2. **Staff**  
In 2011, USC reported 1 FTE per 7,667 students. Currently, USC has 1 FTE per 5,612 students, compared to the national Diagnostic average of 1 FTE per 4,529 students. Though there has been significant improvement in regards to additional FTE, the potential cost to an institution of even one alcohol-related tragedy far outweighs the cost of additional staff members dedicated to overseeing effective and sustainable prevention efforts.
3. USC has not articulated how student alcohol use impacts key institutional priorities (e.g., impact of alcohol use on academic performance, retention, cost management). This should be considered in order to better align prevention efforts with the strategic goals of the institution.

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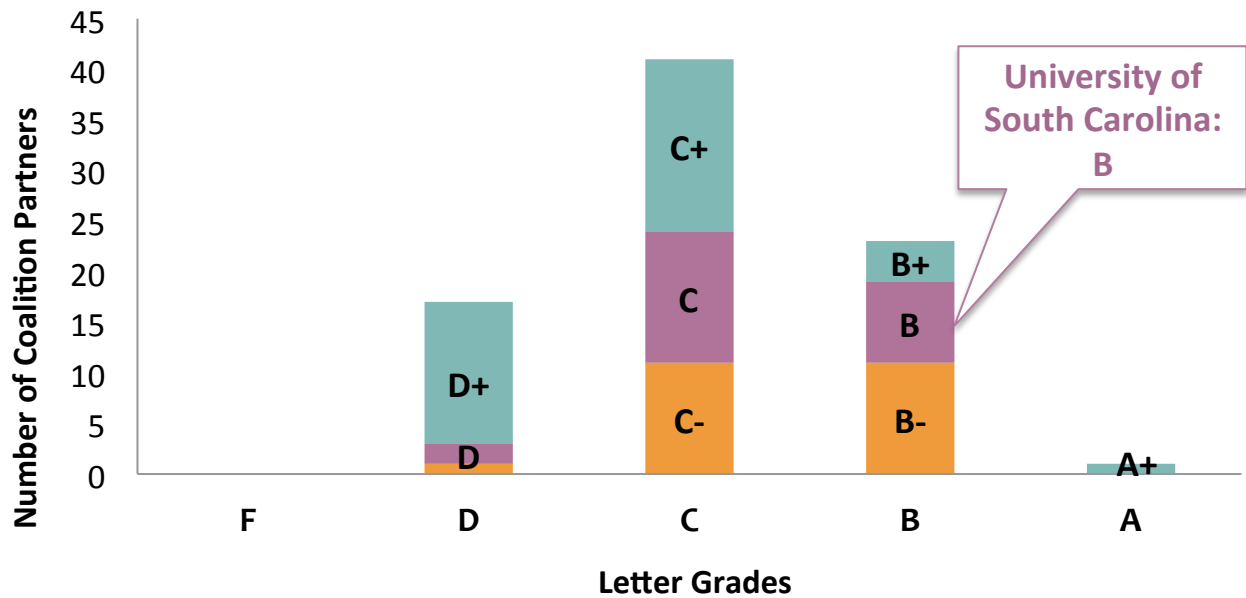
*This document (FEEDBACK REPORT) and its contents are the property of the University of South Carolina and are considered privileged. The contents of the document will not be used in any manner incongruent with privileged information and will not be shared, released, or used in any way without the expressed written consent of the University of South Carolina unless required or authorized by law. EverFi does not provide risk management or legal advice. The content included in this document is provided solely for informational and educational purposes. The Feedback Report is not a substitute for a comprehensive risk management audit and/or consultation by a qualified legal or risk management advisor.*

## Appendix: Distribution of ADI Scores

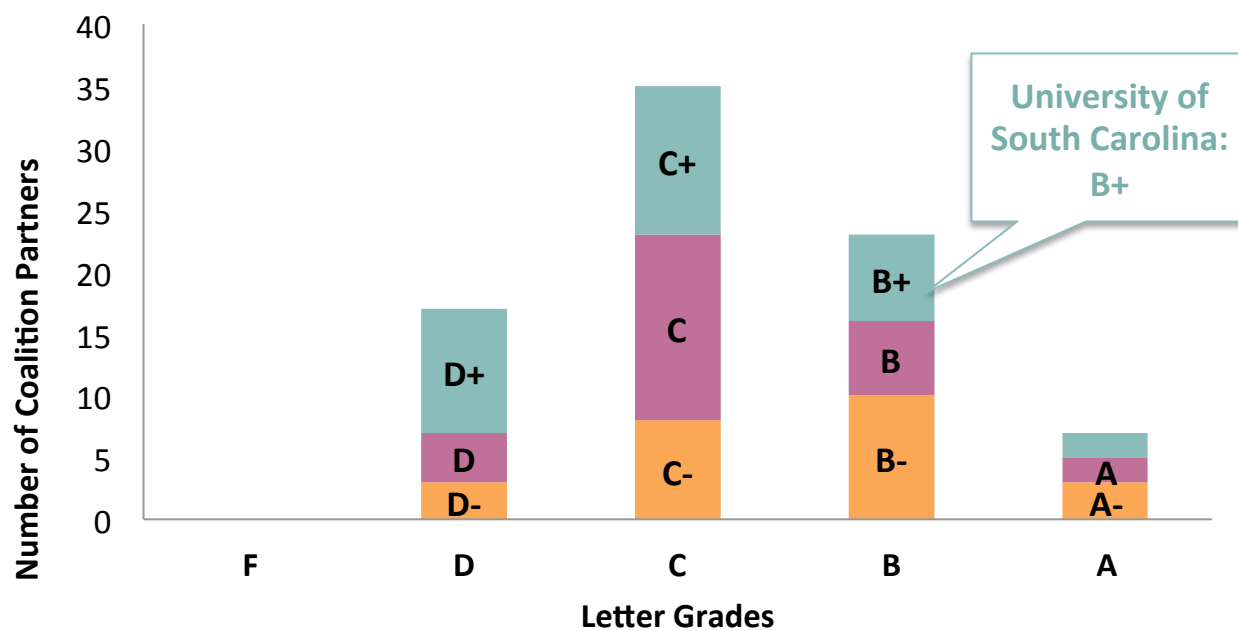
### PROGRAMMING



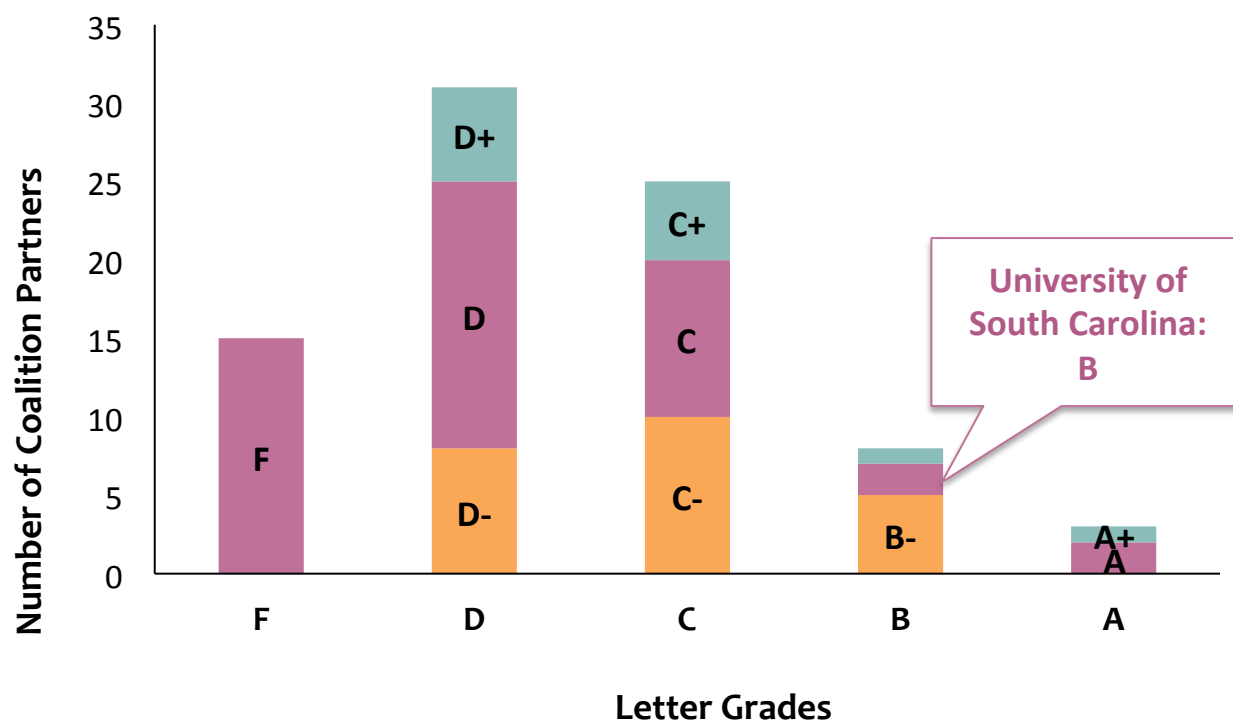
### POLICY



## CRITICAL PROCESSES



## INSTITUTIONALIZATION





# Campus Alcohol Prevention Action Plan

University of South Carolina

September 2017

## Introduction

This Action Plan provides an overview of the University of South Carolina's strengths (assets) and recommendations for improvement in four key areas: programming; policy; critical processes; and institutionalization. The report is based on information provided by USC administrators through completion of EVERFI's Alcohol Diagnostic Inventory (ADI): a comprehensive 200-item assessment of an institution's alcohol prevention efforts. It is meant to serve as a roadmap to guide progress in alcohol prevention on your campus.

In addition, this report offers a benchmark to enable USC to identify progress against other institutions that have been similarly assessed. The distribution measures institutions against best practice and does not distinguish between "like" campuses regarding drinking behavior and outcomes, or the degree to which specific prevention measures are necessary. Please refer to *Appendix I: Benchmarking University of South Carolina Against Other Coalition Campuses* for a graphical comparison of the USC's alcohol prevention work compared to other Coalition institutions that have completed the Diagnostic Inventory process.



### SAMPLE QUESTIONS FROM THE ALCOHOL DIAGNOSTIC INVENTORY

- *What are the primary components of your alcohol prevention programming?*
- *Is your institution performing a lot of activities with limited reach, or is it employing targeted efforts that cover the span of universal, selective, and indicated programming?*
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- *Do you have specific, quantifiable goals for your alcohol prevention efforts?*
- *Has your institution identified key indicators of student health? Does your institution regularly measure and report these key indicators with those who can influence change?*
- *Do individuals or departments outside of Student Affairs play a role in achieving your institution's prevention objectives?*



### KEY AREAS ASSESSED

#### Programming

The scope and impact of current prevention programming

#### Critical Processes

The adherence to processes deemed critical to success in alcohol prevention

#### Policy

Effectiveness of campus alcohol policies related to their enforcement and adjudication

#### Institutionalization

The degree of institutional support for alcohol prevention and the extent of relationships that exist with a variety of constituencies that are essential to prevention success



## Executive Summary

### PROGRAMMING

B-

USC's alcohol prevention programming is good, utilizing a variety of evidence-based approaches targeting universal, selective, and indicated populations.

2011 2017

UNIVERSAL:	C-	B+	USC has improved its universal programming, removing Alcohol Awareness Week and incorporating "health promoting" initiatives such as bystander intervention that will help support the adoption of healthy behaviors and reduce students' risk.
SELECTIVE:	D	C+	USC's selective programming is fair, utilizing trained and supervised peer educators to deliver messages related to alcohol prevention.
INDICATED:	F	B-	USC has a solid collection of indicated programming, having added several evidence-based programs, such as BASICS and e-CHUG to address students with demonstrated signs of alcohol problems.

### POLICY

B

USC's policies are strong, yet there is room for improvement specifically on game day.

2011 2017

WRITTEN:	C+	C+	The written policies at USC are fair, but could be strengthened with policies that restrict alcohol use at tailgate pre- and post-game social gatherings.
ENFORCED:	C-	C-	Administrators at USC report consistent enforcement of alcohol policies. Improvements could be made through publicizing law/policy enforcement plans in advance.
ADJUDICATED:	C	A+	The adjudication process at USC is very strong. It is essential that the written policy and its enforcement ensure students go through the adjudication process as appropriate.

### CRITICAL PROCESSES

B+

USC administrators rely on several data sources to inform prevention efforts. There has been significant improvement in collecting data regarding student behavior off campus.

2011 2017

DATA RELIANCE:	C	C+	Since completing the 2011 Alcohol Diagnostic Inventory, USC has improved in its utilization of data to evaluate campus alcohol prevention efforts. Administrators should continue working to improve the evaluation of such efforts.
PLANNING:	C-	A+	USC has engaged in a formal strategic planning process to inform and guide campus alcohol prevention efforts since completing the Alcohol Diagnostic inventory in 2011.
POLICY REVIEW:	C+	D-	USC administrators should look to undertake opportunities to review and examine alcohol policies on a more regular basis.

### INSTITUTIONALIZATION

Improvements can be made through formally recognizing specific ways in which alcohol use impacts key institutional priorities.

2011 2017

C- B

## Key Themes

1

### INSTITUTE MEASURES TO LIMIT THE AVAILABILITY AND ACCESS TO ALCOHOL ON GAME-DAY.

According to *AlcoholEdu* survey data, 56% of first-year students report pregaming, compared to a national average of 50%. Administrators have reported that a strong focus on pregaming detracts from students' game day experience due to levels of intoxication that result in denial of entry to the stadium or missing the game altogether. With such heightened rates of drinking occurring, it is recommended that the University of South Carolina employ targeted enforcement and policy efforts to curb game-day alcohol consumption, especially in the student tailgating areas. Limiting student access to alcohol is key to improving the game-day environment, and many campuses have successfully convened game-day task forces to effectively plan and implement appropriate policy efforts.

USC administrators report little control of what takes place on gameday, due to private ownership of the stadium and surrounding grounds. We recommend that the institution initiate policies intended to limit drinking prior to attending games and that can be controlled by university administrators, police, or security. One effective approach involves requiring students to be transported to the stadium by bus. Through busing, the university can: conduct thorough sobriety checks before allowing students to board game-day buses; only allow empty water bottles on the bus and provide bottled water to students on the bus; issue game tickets upon boarding the bus after being screened; and delay bus departure until closer to game time. If tailgating events or alcohol-related behavior problems take place on campus due to later bus departure or unofficial or unsanctioned "tailgating" activities, USC PD can enact its own policy and enforcement efforts without overstepping. As a condition for receiving their game day tickets, administrators might also consider requiring students to attend a workshop to learn about USC's expectations for game-day behavior. Schools implementing such a process also make clear that conduct violations occurring on game-days can result in loss of student tickets.

Institutions employing these successful efforts have typically formed a game-day task force with both campus and community representation, (e.g., including police, community ticket holders, bar/outlet owners) to unify the campus around event planning. Since the University already has a relatively active task force that addresses gameday issues, the Carolina Community Coalition should make sure their focus includes (if not already doing so) examining relevant data sources (e.g., police reports, medical transport data) to assess the problem and establish a specific set of goals. Administrators and task force representatives should

consider surveying fans—alumni, season ticket holders, and students—to determine their perceptions of the game day environment areas for focused improvement, and support of potential new policies and enforcement efforts.

The task force should work to engage senior leadership to assist in building relationships with relevant constituencies to gain support for instituting game-day policies that will ensure the health and safety of all fans, including:

- creating a no re-entry policy
- strategic placement of police and proactive issuing of citations
- restricting access to alcohol by placing limits on the amount fans can have in tailgating areas
- designating “dry” or “family” areas that include activities and entertainment options for fans who would prefer to be in alcohol-free environment (similarly designated areas in the stadium should also be considered)
- providing food and non-alcoholic beverages free of charge or through use of a limited number of vouchers that are only good 30 minutes prior to the start of the game (this encourages fans to enter the stadium early, helping to lessen the crowds in tailgating areas)
- requiring a game ticket to tailgate in areas that are in closest proximity to the stadium

The University will need to clearly articulate alcohol policies and expectations to students and fans (e.g., via mass communications, posted signage, etc). The task force should also coordinate with bar owners in the surrounding area to identify strategies that can be implemented in collaboration to limit alcohol availability on game-days. Administrators should use USC data on the increased prevalence of alcohol-related outcomes, particularly sexual violence, among students who drink in the bars to help illustrate to establishments their potential role in helping to mitigate such outcomes.

Lastly, if not already doing so, the Carolina Community Coalition should oversee an assessment plan for game-day strategies. Consider environmental assessment measures such as: property damage (in on- and off-campus residences); noise complaints; alcohol violations, including place of last drink; reported incidents of sexual violence; and other indicators. The task force should evaluate game-day strategies for success through analyzing student survey data and measures noted previously.

Ultimately, as the University also looks to create a healthier off-campus environment that spans beyond game day, the community engagement that results from participation in the task force can play a vital role in addressing ongoing concerns.

## UTILIZE INSTITUTIONAL AND NATIONAL TREND DATA TO ACCURATELY IDENTIFY STUDENT BEHAVIOR THAT WILL INFORM THE DEVELOPMENT OF EFFECTIVE PREVENTION AT USC AND SUPPORT THE HEALTHY MAJORITY.

Identifying appropriate outcomes for alcohol prevention efforts requires an honest assessment and understanding of the current drinking landscape at USC. *AlcoholEdu* data indicates a 71% increase in problematic drinking from survey 1 (pre-matriculation) to survey 3 (post-matriculation) compared to a national increase of 40% (n=330,000). In a 2012 study conducted by EVERFI, pregameing was shown to have a predictive relationship with a variety of negative outcomes including blackouts, poor academic performance, and potential for unwanted sexual experiences. Indeed, blackouts (42%) and hangovers (55%) were the most commonly reported consequences of drinking among incoming first year USC students who reported having a drink in the past two weeks according to 2016-2017 *AlcoholEdu* data.

Using *AlcoholEdu* data to examine the drinking behaviors of students after they have been on campus for several weeks enables administrators to identify the potential impact of the campus environment on students' drinking choices. At the same time, it is important to recognize that some college students are arriving on campus with already established unhealthy drinking patterns. This type of data has prompted a number of schools to engage in a thoughtful review of their admissions materials and processes (e.g. campus tours, overnight visits, acceptance letters) to ensure they communicate a clear commitment to student health, wellness, and success. Some institutions have also endorsed a "delay drinking" message in which they stress the growing body of research supporting that it is in students' best interest socially, physically, and academically to delay drinking as long as possible<sup>1</sup>. Currently, USC has not articulated how student alcohol use impacts key institutional priorities (e.g., impact of alcohol use on academic performance, retention, cost management). This should be considered in order to better align prevention efforts with the strategic goals of the institution.

Evidence-based programs, consistently enforced policies, and readily available alcohol-free social options are an important step toward creating a health-promoting normative environment at USC. Research has identified that alcohol-free entertainment options and social environments can deter high-risk alcohol use by providing students who do not drink or do so infrequently with viable options that do not involve alcohol. If these events are well-conceived, thoughtfully developed, and effectively marketed, they can also detract from high-risk alcohol use among students who typically drink in a high-risk way. Such

<sup>1</sup> Bender, K. (2012). Recommendation for More Direct and Consistent Messaging to Underage Students About Delaying Alcohol Use.

opportunities also demonstrate an institutional commitment to student health and safety, while reinforcing the choice to not drink.

The prevention field has long recognized the correlation between student engagement, academic success, and the use and abuse of substances. The Diagnostic Inventory highlights the success of the Carolina After Dark program led by campus life, though the marketing of such events can be challenging. Beyond programming, student engagement reports consistently indicate the preference for a location where students can connect and engage socially without alcohol. Through providing such an open setting, the institution can demonstrate its support of the behaviors of the healthy majority. Though prevention funding is limited, providing students with such space is a viable alternative that does not require programming resources.

That said, USC is encouraged to make the case for funding that would be dedicated to the development of consistent, ongoing efforts to support students who choose not to drink. Expanded efforts to provide healthy, engaging entertainment options may be beneficial in establishing a supportive environment for abstainers and non-drinkers and providing all students with an attractive alternative to high-risk, alcohol-centric environments. Administrators should be intentional about focusing efforts during high-risk times; for these activities to have the greatest impact, they should be provided on a weekly basis and occur between the hours of 10 p.m. and 2 a.m. (particularly on Thursday, Friday, and Saturday evenings).

### IDENTIFY A VISION FOR PREVENTION THAT ALIGNS WITH THE UNIVERSITY OF SOUTH CAROLINA'S MISSION AND STRATEGIC PRIORITIES

The University of South Carolina's Alcohol Diagnostic Inventory has identified that the institution is providing comprehensive prevention programming, yet significant progress is hindered by the absence of a cohesive institution-wide philosophy and vision about student alcohol use and well-being. USC must develop a mechanism for creating that vision and educating all stakeholders on what that vision entails. It is important to have a consistent answer to the questions: what does prevention mean at the University of South Carolina and what does it look like? This will ensure that all individuals providing prevention are speaking the same language, have a consistent understanding of student well-being, as well as develop behavioral outcomes to evaluate non-evidence based efforts. This will also help identify any gaps in training that may be needed for those who engage in prevention work.

The institution places a high value on outcomes related to student success and retention, however does not mention student health and wellness in the strategic plan. The shift may begin with an examination of the extent to which the institution has articulated and communicated an institution-wide philosophy and vision about student alcohol use. University of South Carolina administrators can evaluate the total cost of alcohol at the institution and estimate the cost savings opportunity from improvement in alcohol prevention by completing EVERFI's Cost Calculator and Alcohol-Related Attrition Calculator. Whether referenced directly or framed within the broader context of health and wellness, USC's expectations around student drinking should be made explicit to all members of the community and emphasize the reasons why such expectations have value for students individually and for the institution as a whole.

An important consideration is ensuring that the philosophy aligns with the federal requirements outlined in the Drug Free Schools and Campuses Act [EDGAR Part 86]. EDGAR requires campuses to notify all students, faculty, and staff of the institution's intention to uphold federal and state laws prohibiting underage drinking. Additionally, schools must explain how they intend to hold students accountable should they violate those laws. However, when institutions communicate to students their intention to enforce the law while at the same time emphasizing that they "drink responsibly", students are left with multiple, mixed messages about the institution's expectations. As a result, when underage drinking rules and laws are enforced, students are

frustrated and confused, questioning the value of the rule they were caught violating, rather than their choice to violate it<sup>2</sup>.

Absent a consistent philosophy and clearly articulated expectations that strengthen and support health-promoting norms, an institution runs the risk of reinforcing an assumption that most students drink and those who do make irresponsible decisions. Though USC has made strides in the planning of alcohol-free events, it remains essential that the students who don't drink or drink infrequently hear a consistent, supportive message that does not communicate an expectation that drinking is a required part of social life at the University of South Carolina. This is also critical to supporting USC students who may be in recovery from a substance use disorder. A campus that is safe for students who are focused on maintaining their sobriety and that provides support for developing a healthy lifestyle, will benefit all USC students.

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<sup>2</sup> Bender, K. (2012). Recommendation for More Direct and Consistent Messaging to Underage Students About Delaying Alcohol Use.

The scope and impact of current prevention programming was assessed based on the following:

- Number of program types: Universal, Selective, Indicated<sup>3</sup>
- Frequency of programming
- Synergy of programming efforts
- Theoretical underpinnings

**NOTE:** To assess programming, our researchers referred to the programmatic impact scores from the Alcohol Prevention Compass, a tool which evaluates the relative strength of more than 30 alcohol prevention policies and programs in terms of their effectiveness, cost, and reach, whether they be

- universal in nature (targeting the entire student body),
- selective (targeting known high-risk student groups), or
- indicated (targeting students at the early stages of developing alcohol problems).

Applying a public health model grounded in behavior change theory, we placed greater emphasis on the impact of universal programs versus selective or indicated. For several programs that lacked any evidence of effectiveness in the research literature, we took into consideration whether there was a sound theoretical basis underlying these approaches. To provide a clear picture of how the University of South Carolina's programming matches up to the Compass research, please refer to **Appendix 2: Mapping the University of South Carolina's Programs Against the Compass**.

- ASSETS**
1. Good variety of evidence-based approaches targeting universal, selective, and indicated populations. AlcoholEdu for College, bystander intervention training, and BASICS help to support the adoption of healthy behaviors.
  2. Use of trained and supervised peer educators to deliver messages related to alcohol prevention. Peer educators play many roles, such as developing materials, facilitating workshops, planning awareness campaigns and campus-wide events, and participating in policy review.
  3. USC is in the process of building recovery support services through an established CRP.

<sup>3</sup> In a 1994 report, the Institute of Medicine proposed a framework for classifying prevention based on Gordon's (1987) operational classification of disease prevention. The IOM model divides the continuum of services into three parts: prevention, treatment, and maintenance. The prevention category is divided into three classifications--*universal*, *selective*, and *indicated* prevention. For more information, visit <http://c.ymcdn.com/sites/www.myprevention.org/resource/collection/8cc9c598-ef77-4cdb-a2df-88ab150a4832/25EIOMModel.pdf>



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**AREAS OF  
FOCUS**

**Maintain efforts to discontinue ineffective programs.** Though USC has discontinued Alcohol Awareness Week since completing the Diagnostic Inventory in 2011, administrators continue to bring invited speakers to campus and participate in tabling for prevention. These programs have no demonstrated efficacy in the research literature and no theoretical basis for behavior change. It can, however, be used to enhance other efforts, as long as the focus remains on more effective strategies.

**Continue to expand and strengthen alcohol-free environments and activities.** USC offers monthly alcohol-free events and activities, but can continue to expand alcohol-free social and recreational offerings through providing open settings for students to gather informally and create needs-driven social spaces. For these options to be effective, they must be provided on a regular basis, in a designated location, and occur between the hours of 10pm and 2am. Creating an effective and innovative strategy for communicating these opportunities is key to institutionalization of such efforts.

**Implement more evidence-based selective programming to address high-risk student populations.** Though USC implements bystander intervention to target high-risk populations, best practice recommends utilizing at least two efficacious selective programs in order to vary methods of program delivery to accommodate multiple learning styles. Small group social norms and Group Motivational Enhancement have a strong basis in the research literature.

## **ACTION STEPS: *Programming***

- ❑ **Discontinue ineffective activities and determine the best way to redirect resources to ensure greater impact and consistency with prevention goals and objectives.**
- ❑ **Continue to build upon current efforts to create visible and institutionalized alcohol-free environments and activities.**
  - Determine how such efforts can be designed to have maximum impact, e.g., being provided on a regular basis, in a designated location, and occurring between the hours of 10pm and 2am.
  - Identify spaces that can be repurposed and used to provide permanent, ongoing events and activities (e.g., coffee houses, open mic nights, movies, etc.)
  - Create an effective and innovative strategy for communicating alcohol-free activities and environments. Begin by determining answers to the following:
    - What messages and themes appeal to the larger University of South Carolina community, and what may hinder or limit participation?
    - How do we ensure that students know what alcohol-free opportunities are available to them whether they are specifically seeking them out, or understanding them as part of social life?
    - How do these opportunities either directly or indirectly reinforce the institution's key strategic priorities.
  - Collaborate with influential student leaders to continue to support and improve upon existing activities, particularly in terms of funding and assessment to inform future efforts and insure continued success.

The strength and effectiveness of campus alcohol policies, enforcement, and adjudication efforts are assessed based on the following:

- Written alcohol policy
- Practices around sale and marketing of alcohol on campus
- Event registration and hosting
- Policy enforcement
- Adjudication/sanctions processes

### ASSETS

1. Since completing the Alcohol Diagnostic Inventory in 2011, USC has required that fraternities and sororities implement responsible beverage service at events.
2. USC now requires that on-campus social functions be registered, an area identified in the 2011 Diagnostic as needing improvement.
3. Feedback collected in the Diagnostic indicates that students at the University of South Carolina are held to the same policy standards “most of the time.” Administrators also report consistent sanctions for alcohol violations.

### AREAS OF FOCUS

**Strengthen policy enforcement efforts in regards to tailgating on gameday.** University administrators report little control of what takes place at tailgates, due to events taking place in locations not controlled by the university. We recommend that the institution initiate policies intended to limit drinking prior to arriving at such locations and that can be controlled by university administrators, police, or security. One effective solution might include issuing game tickets after being screened. If tailgating events or alcohol-related behavior problems take place on campus, USC PD can enact its own policy and enforcement efforts without overstepping. As a condition for receiving their game day tickets, administrators might also consider requiring students to attend a workshop to learn about USC’s expectations for game-day behavior. Schools implementing such a process must also make clear that conduct violations occurring on game-days can result in loss of student tickets.

**Publicize citations/violations.** Currently, USC administrators do not publicize citations/violations when law/policy enforcement takes place. Best practice suggests that administrators should consider reporting such efforts in order to establish and reinforce the institution’s enforcement efforts. USC’s areas of concern, such as off-campus parties, bars, and clubs, should be an initial area of focus. Best practice has identified that enforcement efforts need not take place on a regular basis in order to be effective. Instead, visible and well-publicized efforts implemented in the first few weeks of the academic year will drive the perception of a strong stance on enforcement of local, state, and university laws and policies. This approach has been shown to impact student perceptions of enforcement well beyond those first weeks on campus.

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**Engage student activists** in the policy review and development process, and encourage student participants to speak to their peers about the process and rationale for policy changes in order to gain student buy-in.

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### **ACTION STEPS: *Policy***

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- ❑ **Survey students on measures related to tailgating, satisfaction, and their perceptions of policy enforcement and adjudication processes on game day. Use survey data to:**
  - Establish the extent to which game day policies and procedures are understood and being clearly communicated to students
  - Identify the most common barriers to consistency of policy enforcement, sharing that data with administrators and USC PD in an effort to open channels of communication
- ❑ **Identify how and when USC administrators will invite student participation in the policy review and development process. Decide how students will be recruited or invited to participate in the process, and recruit accordingly. Once policies are developed, engage student participants to speak to the process and rationale for policy changes in order to gain buy-in on the part of other students.**
- ❑ **Create an interest group within the Carolina Community Coalition to explore new policies and processes to mitigate alcohol-related behavioral issues on game days. Consider policies that will discourage pregaming and unofficial tailgating activities by increasing sanctions or attaching sanctions related to game-day privileges.**

Adherence to processes deemed critical to success in alcohol prevention are assessed based on the following:

- Collection and utilization of key data sources for program design/delivery
- Goal-setting and strategic planning
- Evaluation and assessment of prevention efforts
- Compliance with EDGAR part 86 (DFSCA)
- Review and revision of policy
- Sharing of progress indicators and reports

#### ASSETS

1. A variety of resources and data are being collected to evaluate alcohol prevention efforts. This is an area of improvement from 2011.
2. The University of South Carolina measures intended outcomes for prevention programs. Outcomes are based on unique program activities; student needs assessment, strategic planning goals, and validated evaluation tools.
3. In 2011, USC had not engaged in a formal strategic planning process to inform and guide campus prevention efforts. In 2017, administrators report having developed a strategic plan within the past year.

#### AREAS OF FOCUS

**Utilize the Alcohol Diagnostic Inventory results to create an AOD policy report to be included as part of the biennial review in compliance with federal regulations outlined in EDGAR Part 86.** Although the University of South Carolina does have an alcohol and other drugs policy report as required by federal regulations outlined in EDGAR Part 86, the report is over 2 years old and therefore does not meet the standards of compliance. Administrators should utilize Alcohol Diagnostic Inventory results to create an updated AOD policy report to be included as part of the biennial review in order to remain in compliance.

*NOTE: It is not recommended that individual student affairs staff be solely responsible for insuring compliance with the Drug Free Schools and Campuses Regulations [EDGAR Part 86]. In particular, the Biennial Review process that is required as part of EDGAR should be completed in collaboration with multiple stakeholders across campus to include faculty, athletics, campus police, student affairs staff, admissions, financial aid, etc. Ideally, responsibility for ensuring that all requirements for certification are met should fall under the purview of offices or individuals accountable for compliance (e.g., General Counsel, Compliance Office), or that are most likely impacted by a failure to comply (e.g., Office of Financial Aid).*

**Increase regularity of alcohol policy review.** USC completes a comprehensive review and examination of its alcohol policies every three-to-five years. Administrators should look to undertake opportunities to review and plan on a more regular basis, which will assist in keeping up to date with federal regulations.

## **ACTION STEPS: *Critical Processes***

- ❑ Engage appropriate faculty, staff, and administrators in the policy review, revision, and evaluation process to keep senior leaders abreast of progress indicators. In-person participation is preferable to soliciting commentary and feedback via email.

The degree of institutional support for alcohol prevention and the extent of relationships that exist with a variety of constituencies essential to prevention success is measured based on the following:

- Total FTE: prevention staff
- Total budget for prevention
- Outward commitment to prevention from senior leaders
- Inclusion of student health and safety in institutional strategic plan, mission/vision statements
- Level of institution-wide understanding and buy-in for evidence-informed prevention
- Existence of a task force or working group and level of progress toward stated goals

### ASSETS

1. Both the President and Vice President of Student Affairs have communicated publicly about the issue of alcohol on multiple occasions.
2. Although not part of the university's strategic plan, prevention administrators have articulated specific, measurable goals for improving student health and wellness.
3. The University of South Carolina has an established forum to engage stakeholders in alcohol prevention efforts.

### AREAS OF FOCUS

#### Secure campus resources for alcohol prevention:

##### *Funding*

Currently, USC spends approximately \$2.77 per student on alcohol prevention compared to the national Diagnostic average of \$4.38 per student. Administrators can evaluate the total cost of alcohol on the institution and estimate the cost savings opportunity from improvement in alcohol prevention by completing the *EVERFI Coalition Cost Calculator and Alcohol-Related Attrition Calculator*. This data can be used as a powerful lever for gaining support for alcohol prevention from key stakeholders across campus.

##### *Staff*

In 2011, USC reported 1 FTE per 7,667 students. Currently, USC has 1 FTE per 5,612 students, compared to the national Diagnostic average of 1 FTE per 4,529 students. Though there has been significant improvement in regards to additional FTE, the potential cost to an institution of even one alcohol-related tragedy far outweighs the cost of additional staff members dedicated to overseeing effective and sustainable prevention efforts.

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**Build support and visibility on issues related to student health and wellness.** The voices of senior leaders can serve as a strong impetus for groups across campus to understand their collective role in addressing the problem of student alcohol use. Institutions should not be benchmarking against other institutions that have unique circumstances and characteristics/culture, etc. but against best practice in the field of health promotion. The additional visibility of support will also come through identifying an institutional philosophy regarding prevention (see Key Theme 3). that is grounded in a health promotion framework. Such a philosophy should be vigorously supported by senior leadership, particularly at the presidential level, recognizing the impact of influences on student behavior at the individual, societal, and community level.

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### **ACTION STEPS: *Institutionalization***

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- ❑ **Assess resources needed to bring USC's strategic plan and specific, measureable goals for prevention to fruition.**
- ❑ **Identify opportunities for senior leadership to reinforce the university's collective role in addressing student alcohol use and communicate the high priority placed on this issue. Opportunities may include:**
  - frequent messages to students, parents, faculty, and staff (e.g., email messages, letters, convocation speeches, news interviews, group meetings)
  - engagement of USC constituencies that have historically resisted efforts to address student alcohol problems
  - requesting that each administrative and academic department create a plan for how they intend to help reduce student drinking problems, based on the understanding that all aspects of campus life have a direct impact – both positive and negative – on student alcohol use
- ❑ **Identify venues and opportunities to issue statements that reinforce and promote the vision, such as: orientation, convocations, letters to incoming students and parents, and periodic emails prior to times known to be higher risk.**



## Final Thoughts

This report includes a variety of recommendations for the University of South Carolina to consider in order to strengthen its alcohol prevention efforts. When evaluations of this nature occur, it is tempting to focus on areas in need of reform. However, it is important to recognize the thoughtful work being done at USC and use that as momentum to drive further improvements. Administrators at the University of South Carolina have worked diligently to build a comprehensive program in an environment that has presented significant challenges, but is fortunate to have dedicated staff that are willing to challenge the status quo and implement new and effective programs, all with the goal of creating a community that supports students academic, social, and physical well-being.

To support the University of South Carolina in these efforts, EVERFI will provide the following:

- Best practice and research on areas highlighted in this report.
- Webinars to keep the University of South Carolina administrators connected with new and existing prevention research, tools, and services.
- Opportunities for the University of South Carolina to connect with other campuses to build relationships and share resources.
- Opportunities for the University of South Carolina to showcase its efforts nationally through inclusion in case studies and collaboration on professional conference presentations and research projects, where appropriate.

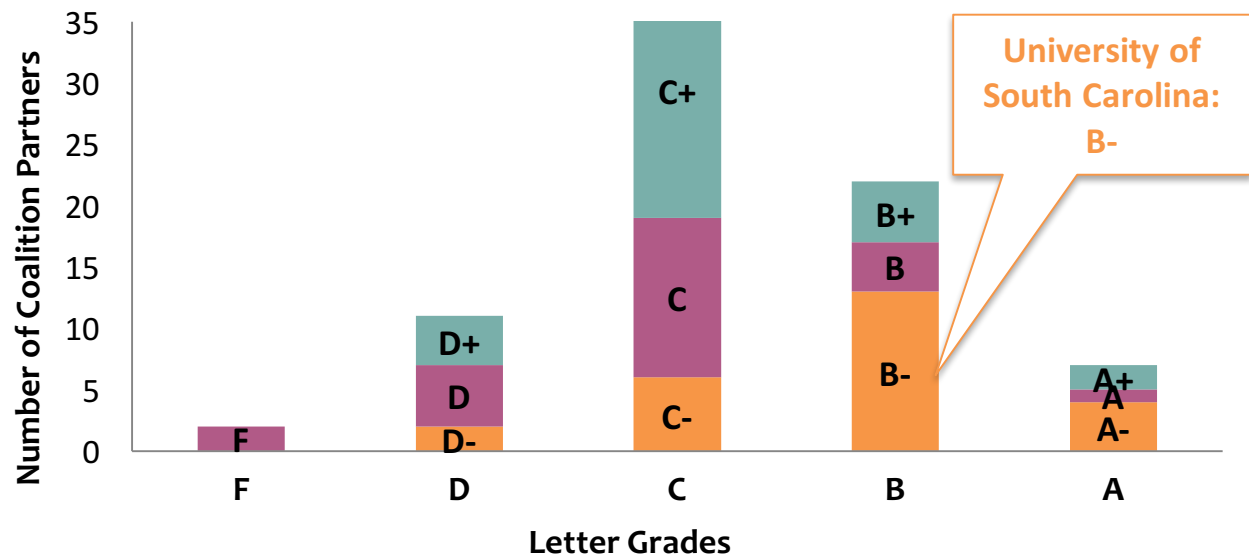
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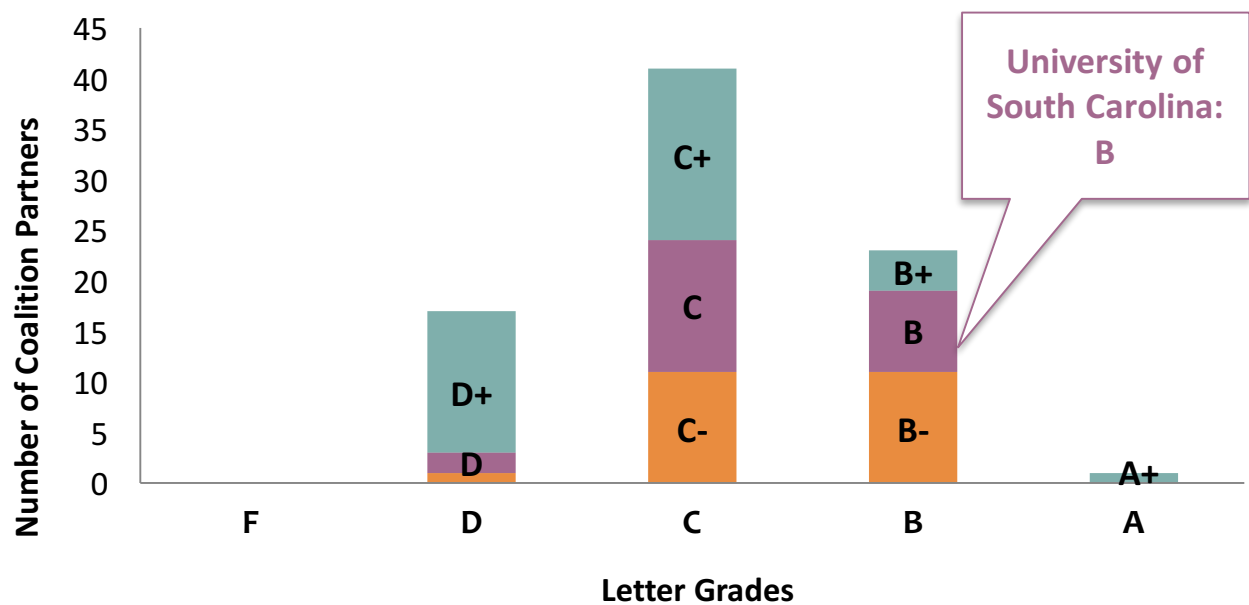


## Appendix 1: Benchmarking the University of South Carolina Against Other Coalition Campuses

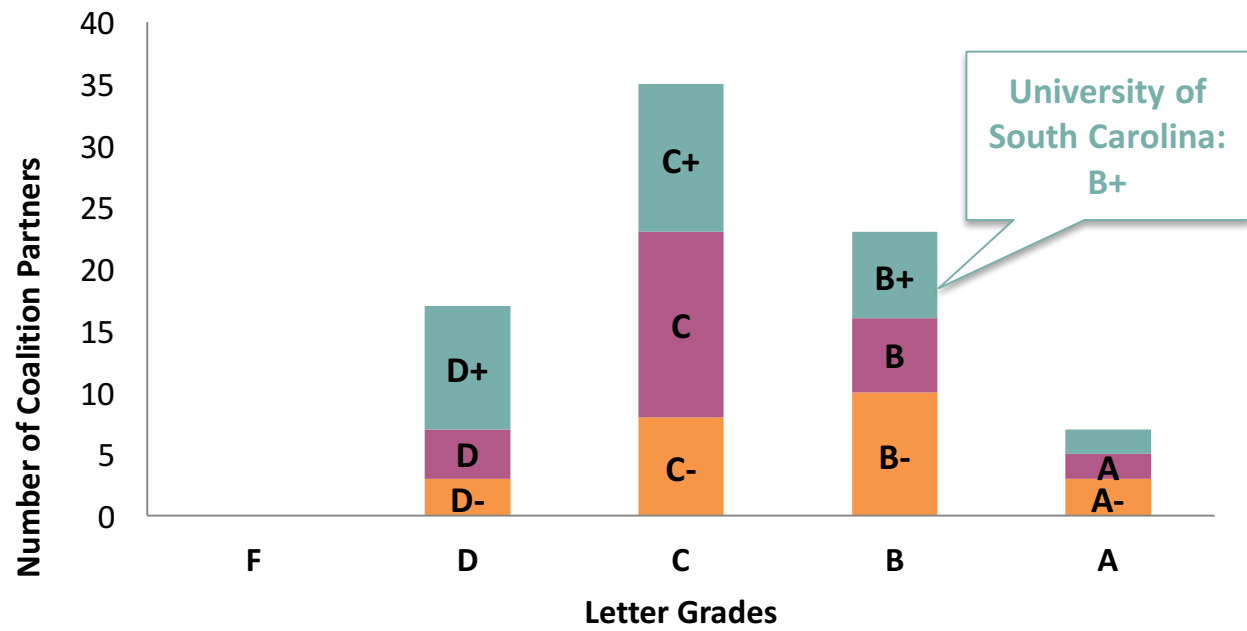
### PROGRAMMING



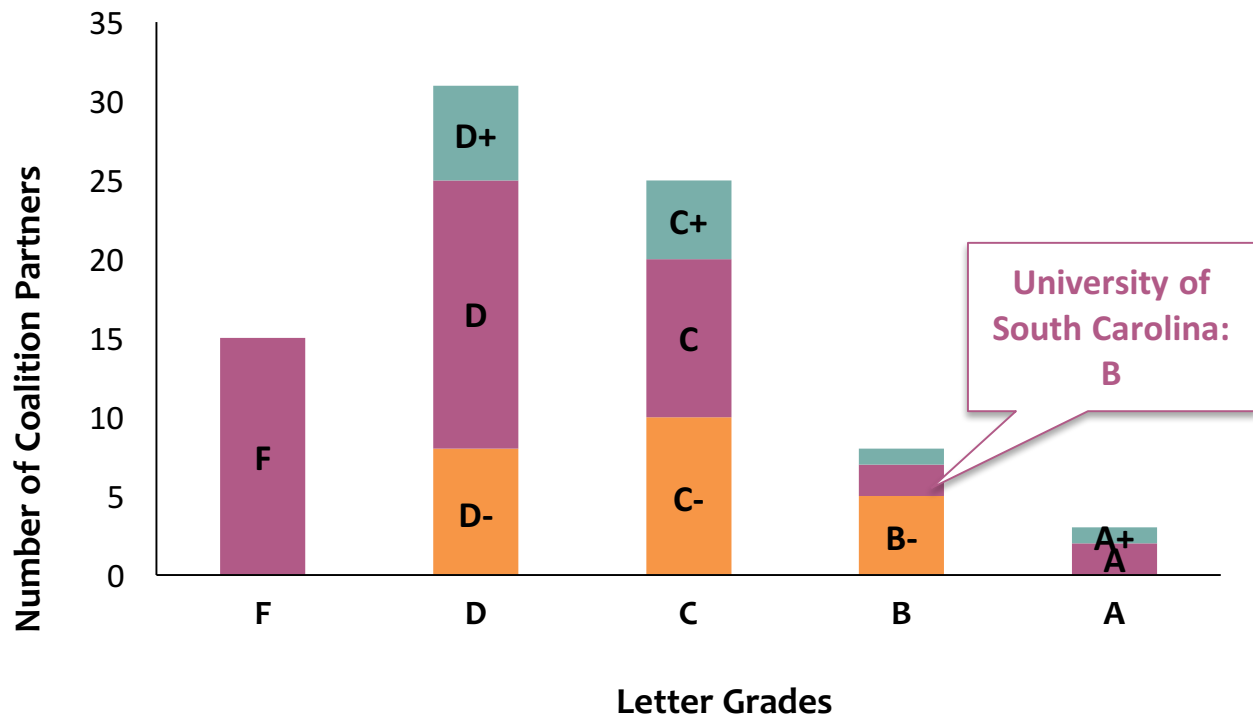
### POLICY



## CRITICAL PROCESSES

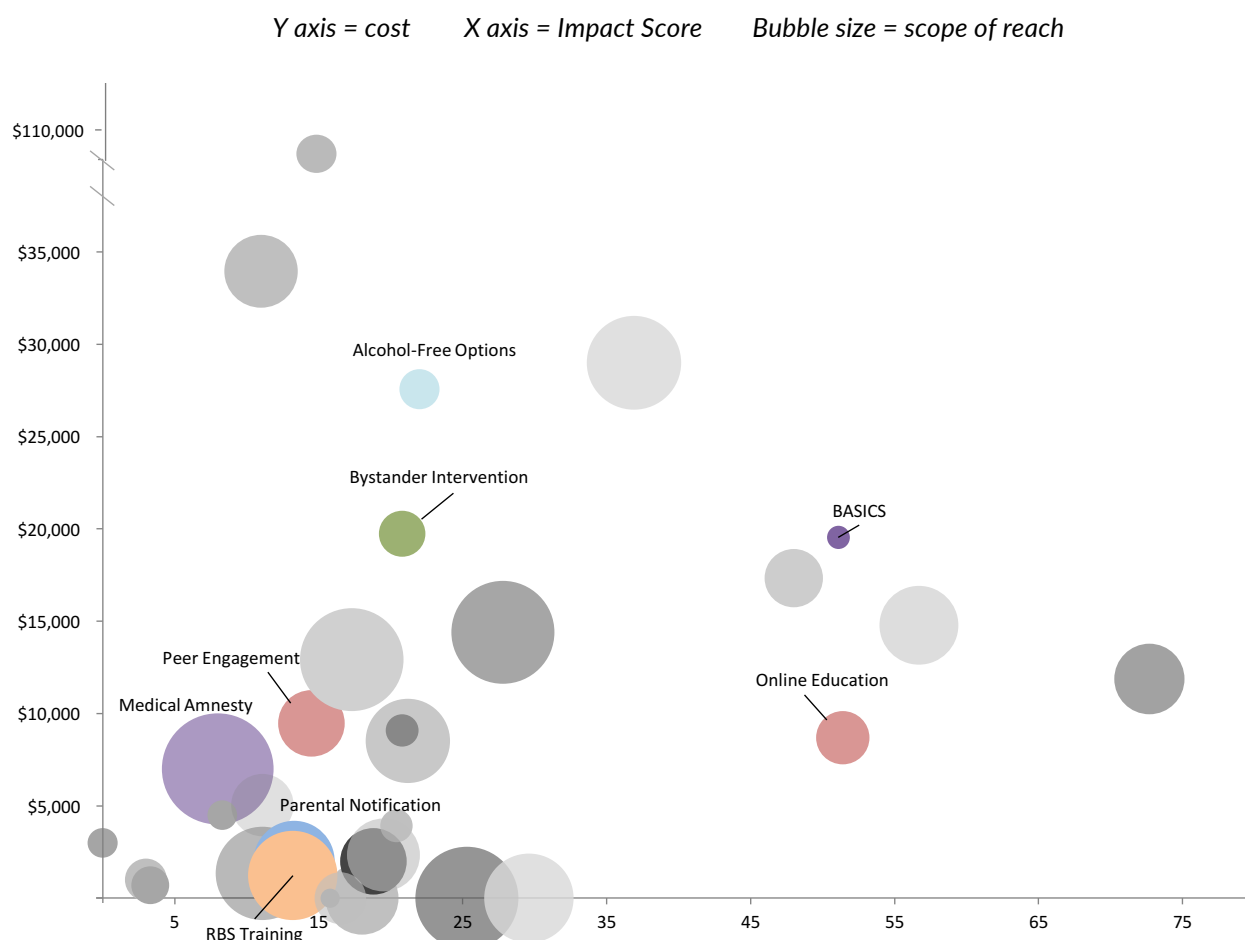


## INSTITUTIONALIZATION



## Appendix 2: Mapping the University of South Carolina's Programs Against The Compass

EVERFI researchers examined more than 200 studies on the relative efficacy of 30+ campus alcohol prevention programs, applying a standardized procedure to assign numeric values to the reported outcomes of these studies, and then averaging the values across the set of studies for each of the programs examined. We also noted the characteristics of the study sample—whether these were a random sample of students, high-risk students, students mandated to receive the program, or other subsets of the student population. Your Prevention Education contact will be happy to provide you with further information about the Compass.



**Note:** The Compass research does not cover each and every program, policy, and strategy in place at the University of South Carolina. As noted in the Action Plan, some programs lack an evidence base, and also any theoretical basis; many of these were excluded from the Compass research.

## Appendix 3: Supporting Materials

### PROGRAMMING

#### Principles of Effective Prevention: Beyond Activities



**VARIED TEACHING METHODS**  
Strategies should be interactive and encourage skill-building.



**APPROPRIATELY TIMED**  
Efforts should be timed in a way to maximize impact in the lives of participants.



**SUFFICIENT DOSAGE**  
Efforts should be frequent enough to have an effect and measure impact.



**SOCIO-CULTURALLY RELEVANT**  
Programs should be tailored to cultural beliefs as well as community norms.



**THEORY DRIVEN**  
Strategies should have scientific backing or logical rationale.



**WELL-TRAINED STAFF**  
Staff should be sensitive, competent and receive adequate training & supervision.



**CULTIVATE POSITIVE RELATIONSHIPS**  
The most effective programs emphasize positive, healthy relationships.



**OUTCOME EVALUATED**  
Evaluation is crucial to determining program efficacy and measuring outcomes.



**COMPREHENSIVE**  
Programs are one piece of the prevention puzzle, and must be integrated with other efforts.

#### Primary Program Types



##### UNIVERSAL

Addresses entire population. Deters onset of risky behavior.

*Examples:*  
Take Back the Night;  
Awareness Weeks;  
Campus-wide efforts.



##### SELECTIVE

Targets subsets considered to be at risk.

*Examples:*  
First year engagement;  
athletes; Greek life; non-traditional students.



##### INDICATED

Targets individuals with early warning signs.

*Examples:*  
BASICS; judicially referred students; students who screen or identify as high risk.

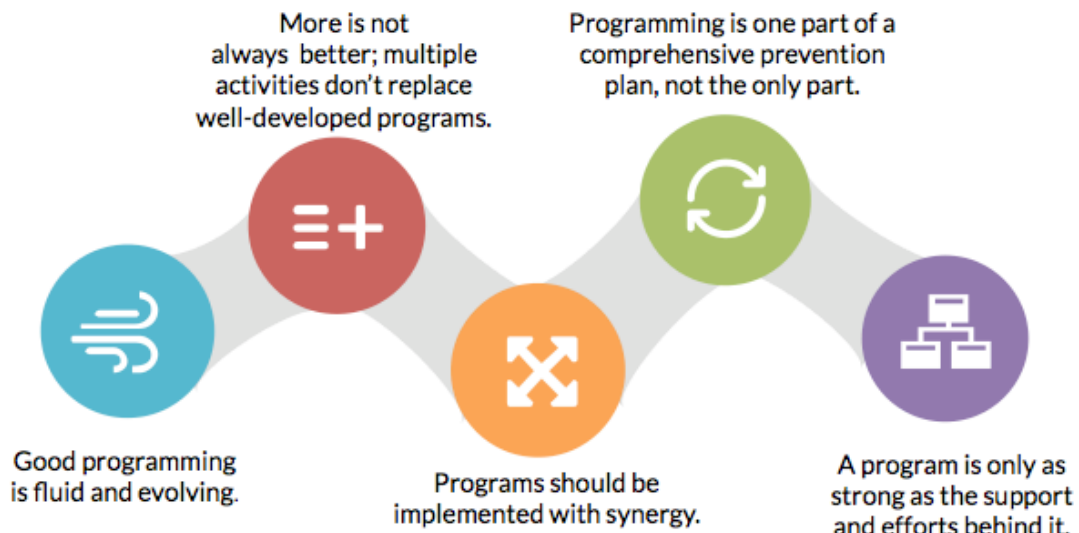
## Choosing the Right Program



Consider the following when choosing and adapting programs:

- ATTITUDES
- BEHAVIORS
- BELIEFS
- KNOWLEDGE
- DEVELOPMENTAL LEVEL
- APPROPRIATENESS  
(For the group, the community, and the issue)

## Programming is a Process



### Experts Weigh in on the Role of Policy

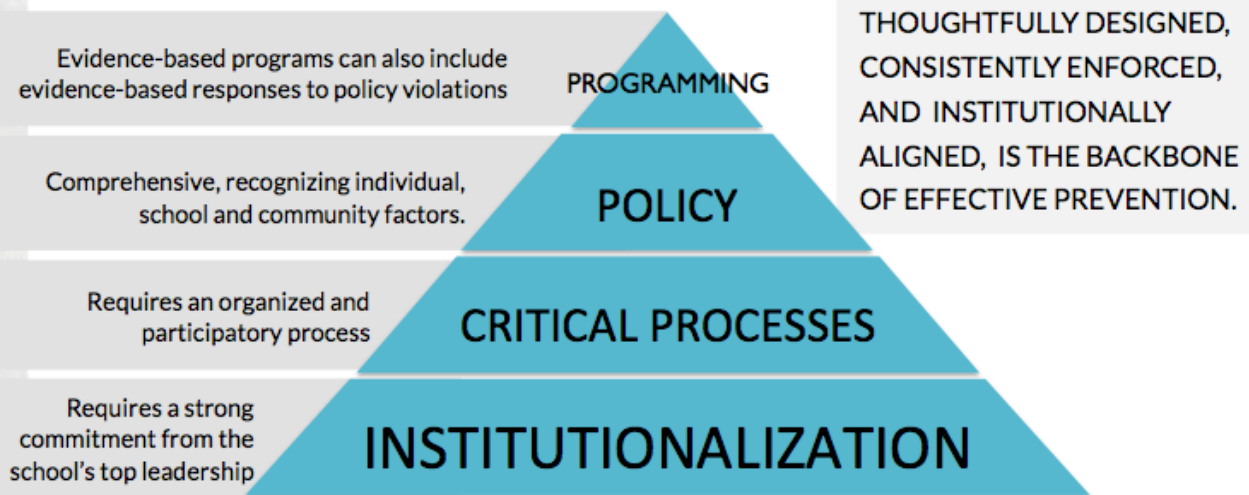
“ There was all this talk about protecting students’ rights and treating them like adults, [but] it was really about protecting the students who were drinking. I [asked] the question: Not all of our students drink, and not all drink heavily. Their **rights are being violated**, their ability to **study, to sleep, to walk across campus safely**. Why aren’t we protecting **their rights**? ”

TRACI L. TOOMEY, Director, Alcohol-epidemiology Program at Minnesota’s School of Public Health

“ Policies that showcase **science** and echo the basic tenets of most **school mission** statements and advocate **personal, social, and cultural development**, genuinely guide both the development of effective prevention as well as contributing to the general body of knowledge regarding how best to prevent high-risk and dangerous behavior on campus. ”

ROBERT CHAPMAN, Associate Director and Clinical Associate Professor, Behavioral Health, Drexel University

### Why Does Policy Matter?





## The Policy Challenge

### THE CHRONICLE of Higher Education

Why Colleges Haven't  
Stopped Binge Drinking:  
Decades of Attention Without  
Much Difference

December 2014

"...colleges continue to treat alcohol abuse as an individual problem, one that can be fixed primarily through **EDUCATION**."

**98%** Use **EDUCATIONAL PROGRAMS**

"The message isn't what changes behavior.

**ENFORCEMENT** changes behavior."

Bob Saltz, Prevention Research Institute

**7%** Have **POLICIES TO REDUCE ACCESS TO ALCOHOL**

## Aligning with Institutional Mission

### Values from the Benedictine Heritage

COMMUNITY • HOSPITALITY • RESPECT • STEWARDSHIP • LOVE OF LEARNING



The College of  
*St. Scholastica*

“ When a Code of Conduct violation has occurred, in addition to the specific behavior there will be a review identifying whether there has been a violation of community, hospitality, respect, stewardship or an impediment to learning for any member of the community. It is also recognized that within each activity a wide range of severity is possible and any of the available disciplinary sanctions may be appropriate. ”

## Examining the Evidence Base for Effectiveness of Policy

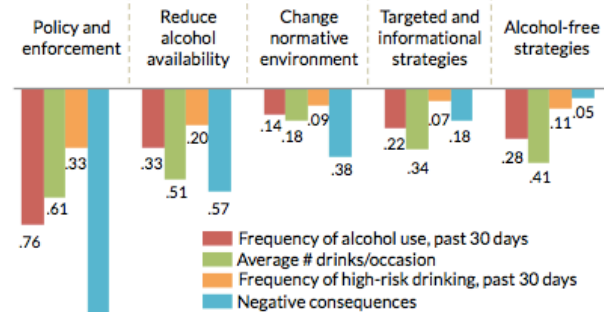
### Impact of State Level Policies

Stronger alcohol policies, including those that do not target youth specifically, are related to a reduced likelihood of youth alcohol consumption (Xuan et al., 2015)

Students attending college in states with more alcohol control policies are less likely to engage in binge drinking.

- keg registration
- BAC limits at or above 0.08%
- restrictions on happy hours, open containers, beer sold in pitchers, and types of alcohol advertising

### Association Between Alcohol Prevention Strategies and Alcohol Use/Negative Consequences



Alcohol policy and enforcement was the most strongly and consistently associated with all of the alcohol-related outcomes

Source: Nelson, et al. (2005); Ringwalt, Paschall & Gitelman (2011)

## Efforts to Address Game Day Behavior Pay Off at Harvard



- Tailgating not allowed earlier than 3 hours prior to kickoff
- Police conduct "sweep" of tailgating areas to move guests into the stadium
- No re-entry to stadium
- No alcohol sold in stadium
- City and campus police/security collaboration
- Limits on amount/type of alcohol consumed
- Must vacate tailgating area within 1-2 hours of game end

### FIRST YEAR IMPLEMENTING NEW TAILGATING POLICY:



**97%** decrease in overall number of medical transports for acute alcohol intoxication (from 30 students to 1 student)

*As a result, nurses who were prepared to treat intoxicated students, instead interacted with the tailgaters, handing out nearly 3,000 individual bottles of water as a sign of good will.*



**87%** decrease in number of admissions to University Health Services (from 30 students to 4 students)



**71%** decrease in number of alcohol-related incidents/ejections (from 97 to 28)

## Making Informed Decisions About Game Day Alcohol Sales



**75 %**

of College Stadiums  
DIDN'T sell alcohol  
in 2015

### WHAT'S DRIVING THE MOVEMENT TO LIFT LONG-HELD BANS ON ALCOHOL SALES?

- Revenue – a response to decreases in attendance, however...other factors (e.g., poor team record) not considered.
- Fans say they want it, however...surveys are mainly of alumni and students.
- It will reduce chugging before entering the stadium, however...underage students will still have to "chug" before entering.
- Incidents have reportedly "decreased" outside of stadiums that started selling beer, but no mention of...
- WVU used as example of success, however...decreased problems also a result of their no re-entry policy.

*FBI data collected over a 21-year period from law-enforcement agencies that serve 96 colleges with a Division I football teams.*

**FINDING:** Sharp increases in number of 17-to-24-year-olds reporting rapes to campus and local police on days when college football team was playing.

At home games: **41 % ↑**

At away games: **15 % ↑**

Source: Mitchell & Montgomery (2015); Lindo, Siminski & Swensen (2016)

## Policy Enforcement: The Role of Consistency

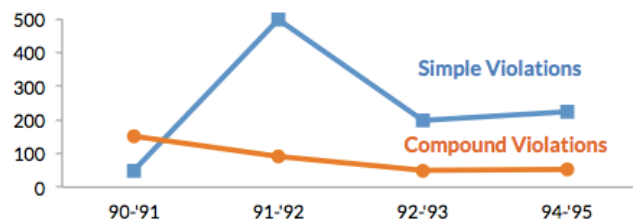
### INCONSISTENT ENFORCEMENT:

- sends a mixed message –allows students to interpret acceptance
- can be construed as a failure to take “reasonable measures”

#### Fixing Broken Res Hall Windows at URI: Enforcement Efforts Lead to Reduced Violations Over Time



“**Compound**” violations (noise, vandalism, harassment, assault, etc.) declined in URI residence halls when “**simple**” violations (underage consumption, possession, etc.) were consistently enforced by RAs.



Source: DeJong (2005); Cohen & Rogers (1997)

## A Renewed Focus on Accountability



### ED Increasing Enforcement Around DFSCA Compliance

**Title IX resolutions** and agreements include express mention of DFSCA compliance

**Biennial reviews** being requested as part of Clerk Act audits and financial aid audits



**\$2.4M** Fine issued from ED after most detailed Clerk review ever undertaken

- **Issues** with public crime log
- **Failure** to collect crime report info from those other than Univ. Police
- **Discrepancies** in stats published on campus vs. those provided to ED
- **Omitted** required policies, including sexual assault, from ASR
- **Failure** to meet guidelines in publishing ASR
- **Failure to comply** with Drug-Free Schools and Communities Act

*“...an institutional obligation rather than a police or security*

*department responsibility alone...”* – The Huffington Post, Nov. 6, 2016

## Determination and Findings Reports Provide a Blueprint

### UNIVERSITY OF MONTANA - MISSOULA



Agreement details specific steps the university will take to:

1. revise the policies, procedures, and investigative practices
2. adequately respond to allegations of retaliation;
3. fully eliminate a hostile environment based on sex;
4. ensure adequate training of Title IX coordinators; and
5. revise notice of nondiscrimination to adequately inform students that sex discrimination is prohibited

<http://www.higheredcompliance.org/resources/publications/um-ltr-findings.pdf>

### PENN STATE



In addition to Clery, multiple violations of DFSCA requirements were noted, including:

- Failure to conduct a substantive biennial review
- Failure to include as part of it's DAAPP:
  - an accurate and complete written description of legal sanctions for unlawful possession or distribution of illicit drugs and alcohol
  - a description of health risks associated with use of illicit drugs and abuse of alcohol

<https://studentaid.ed.gov/sa/sites/default/files/fsawg/datacenter/cleryact/pennstate/PSCFPRD10327991.pdf>

28

## Dillo Day Policy Focuses on Student Health and Safety



Northwestern University

### DURING

### BEFORE

"Everyone is involved and invested from the president to students and guests – everyone has a role to play."



Wristband and guest registration (online process)



40 staff volunteers trained



Student-driven, Administrator supported



Partners committee (off-campus stakeholders) & Logistics committee (on-campus stakeholders)



Award-winning social marketing campaign: "Be a Safe Dillo"



Neighborhood "Knock & Talks" by the Dean



Students routed around back yards (map provided) – water provided along the way



Bags checked at entry, only empty water bottle allowed



Greek-sponsored pancake breakfast and pizza throughout the day, food trucks, late-night food



Beer garden – highly regulated, no in and out, no under 21 (not a money-maker but demonstrates compliance)

### AFTER



Neighborhood clean-up



Post-mortem: What worked, what didn't?



"We close the books in August, take September off, then we're back at it in October."

Source: Coalition Interview

EVERFI

## CRITICAL PROCESSES

### Culture Supportive of Critical Processes

#### "CULTURE OF ASSESSMENT"

An institution's or organization's ways of operating that favor or hinder the use of information to make programmatic or policy decisions

#### Five Key Constructs that Favor a Culture of Assessment



Source: Dr. Matthew Fuller, Sam Houston State University

### An Example of a Balanced Approach to Communication

#### HEALTHY CAMPUS PROGRESS REPORT





## INSTITUTIONALIZATION

### You May Be Wondering

#### Institutionalize

verb | *in-sti-tu-tion-al-ize*

"To cause (a custom, practice, law, etc.) to become accepted and used by many people"

Merriam Webster

#### Institutionalization

"Process which translates an organization's code of conduct, mission, policies, vision, and strategic plans into action..."

**It aims at integrating fundamental values and objectives into the (school's) culture and structure."**

[www.businessdictionary.com](http://www.businessdictionary.com)



**"What you call institutionalization, I call leadership."**

Gary Granger  
Director of Community Safety, Reed College

### Direct Messaging at Wake Forest

#### WFU Alcohol Position Statement

Central to its mission, the University believes in the development of the whole person – intellectual, moral, spiritual and physical. Alcohol misuse inhibits students' development and is negatively correlated with academic success and personal safety. The vitality of the campus community relies on each individual and group taking responsibility for choices related to alcohol use. The health and well-being of the campus community should not be jeopardized by issues related to alcohol.

- The University supports the decision of students not to use alcohol.
- Wake Forest University emphasizes prevention education about the misuse of alcohol and the community's expectations (policy) concerning the use of alcohol.
- Students whose drinking creates a risk of danger to the health and safety of themselves or others are subject to judicial review and/or loss of other University privileges.
- The University observes all applicable state and federal laws regarding alcohol use and holds students accountable for their choices.
- The University provides medical, judicial, and therapeutic responses for individuals with alcohol related concerns.

"Alcohol misuse is negatively correlated with academic success and personal safety... The health and well-being of the campus community should not be jeopardized by issues related to alcohol."

**Top Priority: "The University supports the decision of students not to use alcohol."**

## Mission Drives Wellbeing Initiatives

Education of the whole person — mind, body, and spirit — includes exposure to new ideas and experiences, the arts and culture, as well as opportunities to partake in intellectual, social, athletic, spiritual and recreational activities.

### From Campus Quad to Public Park...



#### Immediate Goal:

- Encourage self-reflection
- Facilitate one-on-one conversation

#### Long-term plan:

- Measure the relationship between a healthy "whole person" and a thriving campus community
- Hiring a director of student well-being
- Ongoing pilot projects in spontaneity



- Movable tables
- Benches
- Board games
- Outdoor classrooms
- Pianos

"...it's so easy to just get in the mindset of, 'I have all these things to get done.' All of these spaces are a reminder just to hang out with people and relax, and focus on community and take a little break from your work, which is really important if you don't want to burn out."

— JESSICA BLACKBURN, SENIOR

"We worry about binge drinking and mindless partying and the whole 'work hard, play hard' mentality...our responsibility to these students does not stop at the classroom door, and so this notion of educating the whole person feels pretty necessary."

— PROVOST ROGAN KERSH

## Considering More Direct and Consistent Messaging

### TRADITIONAL MESSAGE:

"We know you are going to drink, just be safe, responsible, smart, etc..."

### TRANSLATION:

"You are expected to drink, even though it's technically against the rules"

### RESULT:

When laws are enforced, students question the value of the rule they were caught violating, not their choice to violate it.

### RECOMMENDATION:

"...a large body of research validates that the outcomes for our students related to health, safety, academic success and future opportunities will be better if they simply wait until they are older to drink, if they choose drink at all."

Source: Kelly Bender, University of Iowa



## University of Iowa's Focus on Healthy Students

	2010 - 2013	2013 - 2016
<b>GOAL 1:</b> Attract more low-risk drinkers/abstainers to UI	<ul style="list-style-type: none"> <li>Review admissions materials for opportunities to communicate commitment to student health, wellness, and overall success</li> </ul>	<ul style="list-style-type: none"> <li>Promote norms of well-being and student success in pre-admission material</li> </ul>
<b>GOAL 2:</b> More students remain low-risk drinkers/abstainers at UI	<ul style="list-style-type: none"> <li>Expand and promote engagement opportunities targeting FYS</li> <li>Friday Night Series Intramural events</li> <li>Provide personalized feedback in FYS courses</li> <li>Expand living-learning communities</li> <li>Implement sophomore health behavior "screen + intervene" project</li> <li>Increase student participation in high-impact activities</li> </ul>	<ul style="list-style-type: none"> <li>Build on successful 2010-2013 initiatives:               <ul style="list-style-type: none"> <li>✓ On Iowa! pre-semester program – traditions and strategies for success</li> <li>✓ Pick One initiative to encourage involvement in meaningful campus activities</li> <li>✓ Late night programs offered Thursday-Saturday nights</li> <li>✓ More first-year students participating in Friday Night Series Intramural events</li> <li>✓ Health Risk Assessment offered to entire sophomore class</li> </ul> </li> <li>Collaborate with the Iowa City Downtown District to expand alcohol-free entertainment or leisure options</li> <li>Make use of Living Learning Community (LLC) structure in residence halls to promote healthy student norms</li> </ul>

**Appendix K:**

**Late Night Work Group Report**

# Carolina Community Coalition

Late Night Options Workgroup

## University of South Carolina Student Life

***Our Mission:** To create a campus community environment that promotes healthy and safe behaviors among faculty, students, and community organizations*

**Workgroup Goal:** Explore current late night options for students and opportunities for future.

This workgroup met five times in May and June of 2018 to catalog what late night options are available for students, review national research and best practices, analyze our current efforts and make recommendations. Our suggestions focus on improving marketing, infrastructure, and facilities to increase attractive late night options for students, especially after 9pm. National research demonstrates that late night options should focus on attracting the majority of students who drink moderately or not at all, capitalize on student interest in alcohol-free events, and ensure students have a variety of “cool places to hang out”. Competing with Five Points and attracting the highest risk drinkers may be unrealistic, but significant shifts in campus culture could be achieved by providing stronger options for moderate drinkers who choose alcohol-free activities regularly.

### Recommendations:

- **Develop a unified marketing strategy for late night options.**
  - Student involvement is essential to this effort, especially in tabling and guerilla marketing.
  - Publish a weekly email focused on late night options for students, similar to the Sunday night email students currently receive, but sent on Wednesday nights listing only late night events for that weekend.
  - Utilize engagement lists from Alcohol Edu to target marketing for students interested in specific types of programs.
  - Develop a consistent programming schedule. According to research by EverFi, consistency in day and location is key to developing recognizable late night options for students. Recognition of First Thursday, DIY Wednesday, etc. make marketing and participation easier.
- **Increase capacity of existing late night options.**
  - Fund a paid student staff for Carolina After Dark. This is a solution for several identified obstacles to the success of late night options. Student input in planning and marketing these programs is vital to increasing participation. These students should be directed by professional staff and separate from students’ involvement in student organizations.
  - Increase partnerships with student organizations, academic units, and housing areas to assist with marketing efforts and participation, even if the co-sponsor is not able to provide a financial contribution. Consider free tickets to campus performances, tabling opportunities for student organizations at late night events, promoting the Aramark Food Truck or other novelties, mini-grants to support student organizations planning late-night events, and incentives for participation through various entities.
  - Create a late-night options workgroup or committee including student leaders and student and staff representatives from a variety of areas to provide feedback and support to staff who oversee these options and expand ownership beyond Campus Programs staff.
- **Capitalize on student interest and ensure students have a variety of places to “hang out”.**
  - Last year, 41% of students who completed AlcoholEdu expressed interest in attending alcohol-free events. Movie nights, outdoor adventures, and live music rated highest, but field day activities, competitions, e-sports, and arts and crafts all have demonstrated success on campus in the past year.
  - Although the Russell House and Strom are both open until midnight, the options of activities are limited after 9pm. Students are looking for spaces to hang out later and expanding hours and programming in dining facilities, the climbing wall, the Golden Spur Game room, etc. could address this need.
  - Expanding options for the late night shuttle facilitates students traveling to off-campus destinations that can provide healthier options, especially if USC can encourage establishments without a focus on alcohol to provide discounts to students.

#### Definitions:

- Late-night = after 9pm, any day of the week with a focus on Thursday – Saturday.
- Options = includes programs/events, regular activities, and spaces available for students

#### What are the current late night options for students?

- Russell House open until midnight.
  - Dining options close at 10pm, except ice cream.
  - Movies in Russell House Theater, Thursday – Saturday, 6-11pm
  - Carolina Productions hosts karaoke and trivia in Gamecock Park twice per month, 6-9pm.
  - Carolina Productions sponsors approximately 12 large events per semester, typically 7-10pm.
  - Carolina After Dark sponsors approximately 6 large events per semester, typically 10pm-2am.
- Strom Wellness & Fitness Center open until midnight Monday – Friday, 11pm on Saturday & Sunday.
  - Climbing wall closes at 8pm
  - Group Exercise classes end by 9pm.
  - Intramural games: Monday – Thursday until 11pm, Friday until 9pm.
  - Sport Clubs practice Monday – Thursday until 11pm

#### Attachments:

- Full SWOT analysis
- Case example of late night success at the University of Georgia, where a small increase in funding and unified marketing resulted in overwhelming participation from students.