
COMPLIANCE AND GREEK LIFE: TOOLS FOR OVERSIGHT AND COLLABORATION

REGIS BECKER
CHIEF ETHICS AND COMPLIANCE
OFFICER
PENNSYLVANIA STATE UNIVERSITY

GATES GARRITY-ROKOUS
VICE PRESIDENT AND CHIEF
COMPLIANCE OFFICER
OHIO STATE UNIVERSITY

NORTH-AMERICAN INTERFRATERNITY CONFERENCE

NIC represents 66 MEMBER FRATERNITIES

MEMBERSHIP:

Compiled from the 2015-2016 academic year

- 384,193 undergraduates are members of fraternities
- 99,772 men were initiated into fraternities
- There are 6,233 fraternity chapters on roughly 800 college campuses
- There are 4.2 million fraternity alumni in the world

IMPACT:

Compiled from the 2013-2014 academic year

- Fraternity undergraduates served for 3.8 million hours in their local communities
- Fraternity chapters raised \$20.3 million for philanthropic causes
- The all-fraternity GPA is 2.912, higher than the all-male GPA of 2.892

2

FRATERNITY ORGANIZATION & GOVERNANCE

- National fraternities are generally incorporated with a constitution and bylaws. They provide a general organization framework for governance, individual, and chapter membership requirements
- "Nationals" impose rigorous and explicit risk management policies, and condition insurance coverage on strict adherence to those policies
- Institutions of higher education "recognize" local chapters as student organizations subject to the institution's policies that cover recognized student groups
- "House" ownership is a key component of oversight and governance

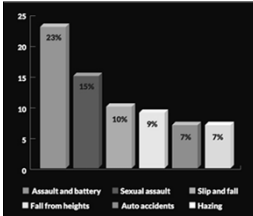
3

NATIONAL STUDY ON HAZING AT COLLEGES AND UNIVERSITIES

- **73% of fraternity/sorority respondents experienced at least one hazing behavior**
- **Most frequently reported male hazing behaviors**
 - Participating in a "drinking game" (31%)
 - Sing or chant in public place unrelated to game or social event (27%)
 - Drink alcohol to the point of getting sick or passing out (24%)
- Respondents reported that in more than 50% of cases, photos of activities were placed on public websites
- **Reasons for not reporting hazing**
 - I didn't want to get my team or group in trouble (37%)
 - Afraid of negative consequences for me from team or group (20%)
 - Afraid of being treated as an "outsider" by members of team or group (14%)

Hazing in View: College Students at Risk. Elizabeth Allen, Mary Madden, University of Maine, 2008.

FRATERNAL DISORDER: THE MOST-COMMON CLAIMS



The bruised or catatonic pledge may be an emblem of fraternization gone awry, but hazing causes only a fraction of the problems at Greek houses. A 2010 analysis by Willis, a major fraternity insurer, based on a sample of liability claims, shows the range of incidents now commanding national attention.

Source: <http://www.theatlantic.com/magazine/archive/2011/04/3/the-dark-power-of-fraternities/357580/>

Penn State hazing death: Attorney general seeks manslaughter charges against frat

Penn State Fraternity Suspended Student Found Unconscious, Hospitalized

Penn State frat members gave pledge 18 drinks in less than 90 minutes, video shows

Penn State fraternity suspended for 4 years after hazing investigation

18 Penn State Students Charged in Fraternity Death

10 Additional Penn State Students Charged in Hazing Death of Pledge

Penn State HAZING SCANDAL

Beta Theta Pi permanently banned: new restrictions put on Greek-letter groups

FALLOUT FROM FRATERNITY HAZING DEATH FAMILY PLANS TO FILE WRONGFUL DEATH LAWSUIT

BETA THETA PI

- **Fraternity Mission:** To develop men of principle for a principled life
- **Fraternity Core Values:** To build lasting bonds of friendship and brotherhood, Beta calls for...
 - Mutual Assistance
 - Intellectual Growth
 - Trust
 - Responsible Conduct
 - Integrity

7

GREEK LIFE AT PENN STATE

- 34 IFC Fraternities (14 suspended) ^{ES1}
- 20 Panhellenic Sororities (2 suspended)
- 12 Multicultural Greek Council Fraternities and Sororities (1 suspended)
- 2 National Panhellenic Council Fraternities and Sororities (1 suspended)
- Approximately 5,000 members
- 4 Governing Councils
- A total of 18 chapters have been suspended since 2015, 13 since Feb. 2017

8

PSU FRATERNITY/SORORITY "COMPLIANCE PROGRAM" HIGHLIGHTS

- University established new **Office of Fraternity and Sorority Compliance (OFSC)** within Student Affairs
- Hired "Compliance Coordinators" to implement risk management plans, review/approve chapter activities
- Disciplinary process transitioned from Interfraternity Council to the University's Office of Student Conduct
- On-site monitoring program with unannounced spot checks
- Deferred recruitment for new members
- Enhanced new member, member, and chapter officer training on sexual misconduct, alcohol, etc.
- Increased police patrols (PSU and Borough officer teams)
- Adopted "zero tolerance policy" for serious hazing incidents
 - "Serious" incidents include forced alcohol consumption that results in injury, physical abuse, or other potentially dangerous activities

9

Slide 8

DS1 just to be clear-- there were 48, prior to 14 being suspended;
same with sororities-- 22 before 2 being suspended; etc.
Danny Shaha, 5/17/2018

PSU FRATERNITY /SORORITY "COMPLIANCE PROGRAM"

Social Monitoring

- All fraternity and sorority chapters must submit individual proposals on how they plan to manage social events for their chapter. When a fraternity or sorority chapter holds a social event, the chapter must follow the guidelines below.
 - Mandatory preconference, monitoring checks, post conference for each social event
 - Limit of 10 socials with alcohol per semester
 - No daylong events
 - Only beer and wine
 - Indoor and outdoor social events limited to the legal capacity of the chapter house
 - Service of alcohol at social events must follow Pennsylvania law and be distributed by RAMP-trained servers

10

PSU FRATERNITY /SORORITY "COMPLIANCE PROGRAM"

Deferred recruitment for new students

- Students must have 14 credits completed to pledge, 27 if transfer student
- Pledge must have no conduct violation that resulted in probation or higher
- Pledge must participate in mandatory education program, including training on alcohol, sexual assault, and hazing
- Fraternity must meet GPA and conduct requirements

11

PSU FRATERNITY /SORORITY "COMPLIANCE PROGRAM"

- University police conduct periodic nightly patrols with municipal partners
- Almost all Fraternities are off campus in State College Borough
 - Borough ordinance prohibits more than 5 unrelated people from living in the same house
- "Neighborhood Enforcement Alcohol Teams (NEAT)" consisting of 2 PSU and 2 State College Officers patrol "Fraternity Row" several nights per week. They coordinate with compliance monitors from the Office of Fraternity and Sorority Compliance.

12

Context

Strategic challenges

- Sexual misconduct; hazing; mental health; alcohol abuse; other Student Code of Conduct violations
- + Volunteer/charitable activities; academic fraternities; place of “home” for students in large university
- \$ Alumni contributions; transition to two-year mandatory on-campus residence

Responsibilities: potential for confusion

- University vs organization vs individual member
- Offices within Student Life (e.g., Student Conduct, Inter-fraternity Council)
- Office of Student Life vs other offices (e.g., legal, compliance)

Individual Fraternity cases (in Student Conduct)

- High-risk cases reflecting Chapter culture potentially treated as “routine” individual cases

Risk Overview

Control



Operational

- Organization cases (regulatory, e.g., Title IX, VAWA)
- Individual cases (regulatory, e.g., Title IX, VAWA)
- Organization cases (non-regulatory)
- Individual cases (non-regulatory)
- Training (e.g., Code of Student Conduct, hazing)
- Pledging and membership activities
- Volunteer activities

17

Immediate Actions

Metrics

- Obtained access to Student Conduct's database
- Assessed available data

Existing investigations

- Monitored all allegations and adjudications
- Convened a meeting on a specific fraternity that was subject to several severe allegations
- Encouraged a comprehensive investigation of that fraternity and tracked its results for leadership

Ongoing oversight

- Compiled risk-rated data about misconduct across the Greek system
- Analyzed systemic challenges and recommended improvements to leadership

Case ID	Organization	Individual	Category	Status	Resolution
1001	Alpha	John	Sexual Misconduct	Resolved	Warning
1002	Beta	Jane	Alcohol Abuse	Resolved	Probation
1003	Gamma	Mike	Hazing	Resolved	Expulsion
1004	Delta	Sarah	Sexual Misconduct	Resolved	Expulsion
1005	Epsilon	David	Alcohol Abuse	Resolved	Warning
1006	Zeta	Emily	Sexual Misconduct	Resolved	Expulsion
1007	Eta	Chris	Hazing	Resolved	Expulsion
1008	Theta	Alex	Alcohol Abuse	Resolved	Warning
1009	Iota	Mia	Sexual Misconduct	Resolved	Expulsion
1010	Kappa	Ben	Hazing	Resolved	Expulsion

18

Short term: risk ratings

Council	Chapter	Demographic Information		Student Conduct			Chapter Issues				
		Active Members	% Issues ⁴	Registered Events	Probation	Suspensions	Drug	Alcohol	Title IX	Hazing	Other
Inter-fraternity Council ⁵	A1	11	27%	30							
	A2	169	30%	85			1	2	1		1
	A3	35	23%	19							1
	A4	20	33%	4							

Chapter	Individual Issues ⁶					Rating ⁶
	Drug	Alcohol	Title IX	Hazing	Other	
A1	1	2				
A2	9	17			4	
A3		4	1		3	
A4	1	2				

Rating system

- Did not incorporate positive metrics
- Takes into account % issues, Chapter issues and individual issues, as well as Chapter history
- Ongoing usage a challenge; provides baseline for periodic monitoring

19

Strategic Overview

Short term

- Mitigate high-risk situations (individual cases, problematic organizations)
- Address environment of increased reputation risk
- Meet ongoing regulatory oversight (Title IX OCR Resolution Agreement)

Medium term

- Identify patterns that reflect broader problems
- Connect to other high-profile topics (hazing, sexual assault, alcohol abuse, mental health)

Long term

- Align incentives (negative & positives) through metrics and reporting
- Clarify roles and responsibilities in university oversight

20

Discussion

21
