

## **Immediate Steps Based on Initial Recommendations from IFC Culture, Prevention, and Accountability Working Group**

### **Executive Summary**

The USC Working Group on Interfraternity Council (IFC) Culture, Prevention, and Accountability was created in November following allegations of sexual violence and misconduct in IFC organizations. The Working Group met in December to craft recommendations based on its first priority, and in January is delivering on its first charge to create a path for IFC chapters to return to hosting social gatherings. It is clear that social environments within the IFC community require enhanced attention to safety planning and risk prevention, and these efforts are based on a joint partnership between the university and the IFC community.

The university and IFC will partner to implement the below requirements as a first step to elevate the standards for IFC recognition. In order for eligible IFC chapters to resume social activities in early February 2022, each chapter must demonstrate compliance with each expectation. Detailed implementation plans for each expectation are in the body of this document.

When the university has confirmed an eligible chapter's compliance with each condition, the university will remove the chapter from the suspension, and that chapter will be permitted to host social gatherings.

- *Prevention Education:* All current IFC chapter members must have 100 percent completion of university-required prevention education workshops. If all members have not completed the mandated training, as tracked by USC Student Health and USC Student Affairs, the chapter cannot resume social gatherings.
- *Pre-Event Planning and Post-Event Review:* Each chapter, with participation of its national organization, will implement advanced risk, security, and compliance reviews before and after social gatherings. The pre-event meetings will cover risk prevention plans, event set-up, permit requirements, noise ordinance guidelines, accountability, education to members and guests, pre-event walkthroughs, and a review of the [NIC Alcohol and Drug Guidelines](#). The post-event meetings will include a review of the risk and event plan implementation, and a summary of what went well and what needs to be adjusted for future events. Any behavior issues or incidents will be referred to USC Student Judicial Affairs and Community Standards (SJACS) or USC Office for Equity, Equal Opportunity, and Title IX (EEO-TIX) for adjudication.
- *Security:* Each chapter will uphold the policy restricting socializing to common areas of the recognized chapter facility and will strengthen its practice by requiring the posting of security not only at entry points and gathering areas, but also at stairs or hallways leading to bedrooms. Security vendors will be selected in consultation with the university.
- *Risk Management:* The IFC Risk Team will be responsible for inspecting events to ensure chapters adhere to event policies; expanding the team to include additional individuals, such as non-IFC-affiliated students, advisors, and university partners; and partnering with the university to implement drop-in event support.
- *Accountability to Community Standards:* The university will implement a new agreement to strengthen individual member accountability with community standards. Every member will be required to sign the agreement. In the past, only IFC leaders attended the training where these policies and procedures were reviewed.

To oversee implementation of these requirements and overall IFC chapter compliance and accountability, USC Student Affairs will hire a Compliance Coordinator reporting to the Associate Vice Provost of Student Development and Engagement. The coordinator will focus on the continued oversight and tracking of compliance education, policies, and guidelines. The university is also evaluating staffing needs required to successfully facilitate and maintain each of the new expectations.

### **Working Group Process**

With its commitment to ensuring the safety of our students, the Working Group recently made recommendations regarding the suspension of IFC social activities. This included identifying the conditions that should be met before social activities can resume. With over 4,000 students participating in fraternities and sororities, the Greek community serves an important role in many of our students' sense of belonging. However, it is clear that social environments within the IFC community require enhanced attention to safety planning and risk prevention.

After multiple working sessions and reviewing literature and best practices, the Working Group identified immediate opportunities to enhance the partnership between the university and the IFC community. Establishing such practices could allow social activities to resume on or after February 3. While the Working Group continues its review of recognition standards, education, and further prevention efforts, the conditions outlined in this document offer a path to a phased return of IFC social activities.

### **Phased Return to Social Gatherings**

- *Phase 1 – Recruitment:* The phased return begins with the new member recruitment process. This will be a series of substance-free events, held over a period of 10 days, with informational and connection activities that allow potential new members to learn about individual chapters. The IFC Recruitment Team has been meeting to discuss a safe and healthy recruitment process for all potential new members and is prepared to begin the process on or after January 20.
- *Phase 2 – Conditions to Return:* Next, each chapter is expected to commit to the below conditions, which include revised trainings, practices, and improved mechanisms related to prevention education, pre-event planning and post-event review, security, risk management, and accountability practices. These added conditions will also serve to gather data which, in turn, will inform continued improvements.
- *Phase 3 – Partial Return to Social Gatherings:* On or after February 3, chapters in compliance with the conditions may host two social gatherings within a month.
- *Phase 4 – Full Return to Social Gatherings:* Finally, once each chapter meets the conditions, they may return to a full calendar of social activities after March 3.

### **Detailed Conditions to Return**

The Working Group developed the below conditions to strengthen the existing Fraternity Sorority Leadership Development (FSLD) Event Hosting Education Program. An individual chapter must demonstrate compliance with all of these conditions to be removed from suspension and be permitted to host social gatherings.

- **Prevention Education: All current members of each IFC chapter must reach 100 percent completion of university required prevention education workshops. Any noncompliant members must sign up for workshops and attend the first dates in 2022.**
  - *Previous Practice:* The university monitored individual student compliance.
  - *New Practice:* Individual student compliance impacts the chapter's good standing. Chapters will only be permitted to hold social gatherings when they have achieved 100 percent compliance by every member. Compliance will be tracked by USC Relationship & Sexual Violence Prevention Services (RSVP) and USC Student Affairs.
  - Compliance process for RSVP Prevention Education Workshops:
    - January 11: First RSVP compliance report was run.
    - January 14: Reminders sent to all members not in compliance, including instructions to sign up and complete a workshop by January 28.
    - January 31: Second compliance report run; any organization that has not met 100 percent completion by this date will be unable to host events beginning February 3, and will remain on social suspension until all members complete education requirements.
  - Compliance process for Student Affairs Hazing Prevention Education Online Training:
    - January 18: Compliance report run; reminders sent to all students not in compliance, including instructions to complete the online module by January 28.
    - January 31: Second compliance report run; any organization that has not met 100 percent completion by this date will be unable to host events beginning February 3, and will remain on social suspension until all members complete education requirements.
- **Pre-Event Planning: Each chapter, with participation of the national organization, will engage in an advance review of event planning focused on its chapter risk plans related to events and safety. Chapter risk plans are written by each chapter and approved by its national organization; FSLD keeps the plans on file for university reference.**
  - *Previous Practice:* Each chapter submitted a pre-event briefing to FSLD via online platform.
  - *New Practice:* The university, in partnership with IFC, is developing an expanded Fraternity Sorority Event Review Committee to conduct semester and weekly planning meetings.
  - Pre-event planning will have three components:
    - 1) Once a semester, FSLD will coordinate a meeting between the Fraternity Sorority Event Review Committee and each IFC chapter to review chapter-specific risk management plans with a focus on events, safety, and a review of the [NIC Alcohol and Drug Guidelines](#). The Committee will include FSLD,

Department of Public Safety, Fire Safety, Student Judicial Affairs & Community Standards, student leaders, and other Student Affairs staff.

- a. January 24 - February 2: all chapters will complete their first Event Review Planning Meeting.
  - 2) On Wednesday afternoons, FSLD will coordinate an event review meeting with the Fraternity Sorority Event Review Committee for each chapter hosting an event that upcoming weekend. The meetings will cover risk prevention plans, event set-up, permit requirements, noise ordinance guidelines, accountability, education to members and guests, pre-event walkthroughs, and a review of the [NIC Alcohol and Drug Guidelines](#).
  - 3) Weekly, chapter leaders will participate in an online event review process via the EngageSC platform.
- **Post-Event Review: On Monday afternoons, FSLD will coordinate an event review meeting with the Fraternity Sorority Event Review Committee and chapter leaders to review effectiveness of risk management plans, security implementation, and budget documents to ensure compliance with North American Interfraternity Council (NIC) Alcohol and Drug policies and event guidelines.**
    - *Previous Practice:* Post-event reviews were not conducted formally.
    - *New Practice:* The university, in partnership with IFC, is developing an expanded Fraternity Sorority Event Review Committee to conduct semester and weekly planning meetings.
    - The post-event meetings will include a review of the risk and event plan implementation, and a summary of what went well and what needs to be adjusted for future events. Any behavior issues or incidents will be referred to USC Student Judicial Affairs and Community Standards (SJACS) or USC Office for Equity, Equal Opportunity, and Title IX (EEO-TIX) for adjudication.
  - **Security: Each chapter will uphold the existing policy prohibiting guests from entering bedrooms during social events, including new members or members who do not live in the houses, thus restricting socializing to common areas of recognized IFC chapter residences. The chapters will strengthen their practice by posting security officers not only at entry points and gathering areas, but also at stairs or hallways leading to bedrooms.**
    - *Previous Practice:* Each chapter hired private security to manage entrances and wrist band distribution.
    - *New Practice:* IFC will require chapters to place security officers at the stairs or hallways leading to bedrooms. Bedrooms should remain closed and unused. Security vendors will be selected in consultation with the university.
  - **Risk Management: The IFC Risk Team will be responsible for inspecting events to ensure**

- each chapter adheres to event policies. The team will expand to include additional individuals, such as non-IFC-affiliated students, student leaders, advisors, and university partners. The IFC Risk Team will partner with the university to implement drop-in event support.**
- *Previous Practice:* The IFC Judicial Board was responsible for addressing concerns during events when corrective action was needed in the moment; however, the board has not focused on risk management. DPS also performed unannounced visits at chapter facility events and if a safety concern was noted, DPS shut down the events and filed reports with SJACS.
  - *New Practice:* The IFC Risk Team will be responsible for inspecting events to ensure chapters adhere to event policies.
    - The IFC Risk Team will be formed by IFC and include members such as non-IFC-affiliated students, advisors, and university partners from Student Affairs, the Department of Public Safety, and Fire Safety.
    - The IFC Risk Team and DPS will formalize the process for chapter facility visits. The unannounced visits will become standard practice every week at social gatherings to observe, connect, and support the chapters. If required conditions are not met, DPS will shut down events and file reports with SJACS.
    - The DPS party response team regularly patrols 28<sup>th</sup> Street and the surrounding communities and will be prepared to check in on events and shut down events that are in violation of the student conduct code.
  - **Accountability to Community Standards: In addition to existing university policy and guidelines, each chapter member will sign a new Student Accountability Agreement to strengthen individual accountability with community standards.**
    - *Previous Practice:* Twice a semester, FSLD coordinated event-hosting education meetings with chapter leaders and campus partners to review:
      - [Group Responsibility Section of SCampus](#)
      - [FSLD Event Hosting Education Program](#)
      - [NIC Alcohol and Drug Guidelines](#)
    - *New Practice:* In addition to the education meetings with chapter leaders twice a semester, every chapter member will be required to sign an agreement reinforcing:
      - Their commitment to community behavior expectations
      - The accountability process via their chapter judicial boards and SJACS
      - The requirement to immediately report any allegations of sexual assault, drugging, or harassment to EEO-TIX

### **Accountability Processes**

In summary, there are two accountability processes related to IFC social gatherings:

- *FSLD Event Guideline Violations:* If a chapter deviates from the [FSLD Event Guidelines](#), the FSLD and IFC Risk Team (formerly IFC Judicial Board) will determine corrective action, which may include involvement from campus partners, such as SJACS and EEO-TIX. Corrective action may include the loss of ability to host gatherings that month.
- *Student Conduct Code Violations:* If a chapter commits a violation of the [student conduct code](#), DPS will shut an event down. The DPS report will be sent to SJACS for review, and the chapter will be placed back on social suspension.
  - Under the Student Conduct Code, interim protective measures, including interim suspension, may be imposed upon a student or student organization after a report of prohibited conduct is received, pending resolution of a conduct case, where there is information that, if true, indicates the student and/or student organization poses a substantial threat: (i) to the safety or well-being of anyone in the university community; (ii) to the property within the university community; or (iii) of disruption or interference with normal university life or functions.

The accountability actions outlined in this document were developed in collaboration with IFC to create a safer environment. The university will take rapid action with chapters where, despite additional support, patterns of behavior continue to violate the partnership with IFC.

### **Implementation Timeline**

#### *Week of January 10*

- Interim Action Committee confirms individual chapter's eligibility and good standing
- Communications to Working Group, IFC, and university community regarding phased return of social gatherings
- Prevention Education rosters reviewed for student compliance with requirements

#### *Week of January 17*

- Spring 2022 recruitment begins

#### *Week of January 24*

- Student Accountability Agreement completed and distributed to Chapter Presidents
- IFC chapters set-up meetings with Student Affairs and campus partners to review chapter level risk plans focused on events and safety

#### *Week of January 31*

- Security policies updated and Chapter Presidents trained on implementation
- Deadline for chapters to complete Prevention Education coursework
- First weekly Event Review Meeting
- First IFC Risk Team meeting

*February 3*

- Eligible IFC chapters in compliance with all expectations may begin a limited calendar of social gatherings

*Week of February 7*

- First weekly Post-event Review Meeting

*March 3*

- Eligible IFC chapters in compliance with all expectations may resume a regular schedule of social gatherings

**Next Steps**

The major conclusion of the Working Group is that creating a safe IFC community will require culture change that results in responsibility, accountability, and upholding of USC values. Future requirements will include, but are not limited to, these initial Working Group recommendations:

- **Alcohol in Social Environments:** The Working Group will analyze enforcement and accountability measures regarding existing policies on alcohol consumption within fraternity social settings. This will inform the creation and implementation of new practices to ensure that social activities comport with safety protocols. This analysis will be complete in February 2022.
- **IFC Task Force:** A student-led IFC Task Force, with oversight by Student Affairs, will be established, composed of mental health chairs, risk chairs, or other relevant chapter leadership to suggest, direct, and implement changes that will improve community safety. The task force will launch in March 2022.
- **Code of Conduct (Group Responsibility Section):** The group responsibility section expectations in SCampus will be updated to reflect recommendations around increased safety and risk prevention. The updates will be drafted, reviewed, and in place by April 2022.
- **Peer Education:** Social chairs, risk chairs, wellness chairs, and chapter presidents will be enlisted to train their members prior to hosting any social events on issues related to consent. This will include information about meaningful consent, concepts of power and privilege, and how to tolerate rejection. RSVP will lead implementation of this work in partnership with FSLD and the IFC Task Force. RSVP is piloting this model in Spring 2022.

The Working Group will continue its focus on longer term culture change within its next two charges:

- Reviewing IFC recognition, education, and prevention strategies and redesigning them as necessary to align with USC's core values and safety expectations.
- Re-envisioning the accountability process to address failures to act consistently with USC values.