We are pleased to receive this thoughtful report on student safety issues related to alcohol and drug use on and off campus. Our special thanks go to Commission chair Dr. Charles O’Brien of the Perelman School of Medicine, Commission vice chair Joann Mitchell, Vice President for Institutional Affairs, and all the members of the Commission for their effort, time, and careful consideration. We would also like to thank the many students, faculty, and staff who either served on various Commission working groups or who otherwise shared their wisdom and insights with the Commission during the course of their deliberations.

Given the importance of these issues, we will move quickly to implement the Commission’s recommendations and focus additional attention and resources on coordinated efforts in education, prevention, and support. We are committed to working with and on behalf of our students to ensure their continued safety and well-being, and would take this chance to again thank and applaud all the dedicated members of the Penn community who are hard at work on these issues already.

—Amy Gutmann, President
—Vincent Price, Provost

Report of the Commission on Student Safety, Alcohol and Campus Life

Executive Summary

On January 9, 2013, President Amy Gutmann and Provost Vincent Price announced the establishment of the Commission on Student Safety, Alcohol and Campus Life (“Commission”) which was charged with reviewing “the status of student social life at Penn with a primary focus on consumption of alcohol and other drugs and the consequences for student conduct.” The Commission was asked to “pay particular attention to the potential for sexual violence and other forms of injurious behavior that can result from excessive alcohol consumption.” The Commission was led by Dr. Charles O’Brien, the Kenneth Appel Professor, Vice Chair of the Department of Psychiatry, and the founding director of the Center for Studies of Addiction in the Perelman School of Medicine. The other members of the Commission were Vice President for Institutional Affairs Joann Mitchell (Vice Chair), Vice Provost for Education Andrew Binns, Dean of the College Dennis DeTurck, Vice Provost for University Life Valarie Swain-Cade McCoulum, Vice President for Public Safety Maureen Rush, and Senior Vice President and General Counsel Wendy White. Julie Lyzinski Nettleton, Director of the Office of Alcohol and Other Drug Program Initiatives, served as the Commission’s project manager. The Commission gathered information and ideas, both internally and externally, through five working groups which focused on academic consequences, facilities, policies and resources, safety, and student experiences. The Commission’s working groups included students, faculty, and staff whose experiences, expertise, and advice helped to shape the Commission’s findings and recommendations.

The Commission found that Penn has an array of resources actively collaborating to educate students about the effect of the use and abuse of alcohol and other drugs; inform students of their rights and responsibilities—both individually and collectively; and respond when students are adversely affected as a result of their own misuse of alcohol or that of others.1 The University’s efforts have resulted in extensive support and important safety nets for students which work effectively and in close cooperation to provide information and interventions that optimize student safety.

As the Commission’s review confirmed, this is a nationwide problem that demands continued focus and attention. While Penn has highly trained, sensitive, and sophisticated staff as well as policies and protocols that reflect best practices, it is always appropriate to consider other strategies to ensure that we remain as effective as possible in keeping our students safe. To that end, we recommend three additional steps to strengthen the University’s already expansive network of resources for preventing and responding to alcohol and other drug misuse:

1. Establish an additional position whose incumbent would provide student safety education, particularly with regard to preventing interpersonal and sexual violence and hazing.
2. Ensure that appropriate resources and supports are in place to support and extend strategic and programmatic efforts.
3. Continuously create, promote and refine efforts to prevent the misuse of alcohol and other drugs and to prevent associated negative consequences such as academic under-performance, hazing, and interpersonal and sexual violence.

One of the most important impacts of this review of the policies and resources available to support the prevention and response to the misuse of alcohol and other drugs has been the heightened level of awareness and increased attention to this important issue across campus. Some of the efforts that have already been undertaken are:

• The Division of Public Safety and the Office of Alcohol and Other Drug Program Initiatives partnered to apply for a 2013 Pennsylvania Liquor Control Board Grant to reduce high-risk drinking in the off-campus community. The grant was awarded and work on the project began in October 2013 and will continue through June 2015;• The Title IX Coordinator, Penn Women’s Center, the Division of Public Safety’s Department of Special Services, and other resource offices developed Student Guidelines to provide detailed information about the University’s Sexual Violence Policy and resources and support available for complainants and respondents;
• The Office of Alcohol and Other Drug Program Initiatives created a link on its website regarding alcohol-related behaviors and responsibilities. The Office of Residential Services posted the link to this website in its fall 2013 parent newsletter;
• An Ivy-Plus Student Symposium on Alcohol is being planned by the Office of Alcohol and other Drug Program Initiatives in collaboration with the Undergraduate Assembly and the Interfraternity and PanHellenic Councils for February 21-22, 2014;
• The Student Health Service, Office of Alcohol and Other Drug Program Initiatives, Emergency Department of the Hospital of the University of Pennsylvania, and Division of Public Safety are reviewing a proposed blood alcohol content (BAC) study in an effort to more fully understand the overall level of risk for students receiving medical care for drinking or other drug misuse and any implications for additional educational programming or interventions. This pilot project will be administered by the Emergency Department of the Hospital of the University of Pennsylvania.

Students, faculty, staff, parents, and alumni have important roles to play in ensuring the health and safety of Penn students. A great deal has already been accomplished as a result of longstanding effective partnerships on campus as well as newly established collaborations. The challenge ahead is continued innovation in our strategies and approaches to foster a healthy and safe campus community for all students.

See, Almanac, January 15, 2013 (http://www.upenn.edu/almanac/volumes/v59n17/commission.html)

2 When alcohol is referenced in this report, unless there is a specific notation to the contrary, it refers to alcohol and other drugs.
Report of the Commission on Student Safety, Alcohol and Campus Life

Introduction

On January 9, 2013, President Amy Gutmann and Provost Vincent Price announced the formation of the Penn Commission on Student Safety, Alcohol, and Campus Life. The Commission was asked to review the status of social life at Penn, examining the consumption of alcohol and other drugs and its consequences, such as interpersonal violence, sexual assault, and hazing. President Gutmann and Provost Price noted that considerable resources have been devoted to ensuring that Penn has a “safe and healthy environment for students” and that the University is actively engaged in “educating our students to act respectfully and responsibly toward one another.” President Gutmann said that:

Nationally, there have been a disturbing number of recent incidents where excessive alcohol consumption led to tragic consequences. No campus—indeed no sector of American society—is immune from these problems. This is an important time to examine our current programming to ensure that Penn’s policies and programs represent the best practices for facilitating responsible student conduct.

In charging the Commissioners, the President and Provost asked them “to pay particular attention to the potential for sexual violence and other forms of injurious behavior that can result from excessive alcohol consumption, to assess the efficacy of existing programs that are designed to ensure responsible student conduct and safety, and to make recommendations for enhanced or new programs, policies, and practices to improve the quality and safety of student life.”

The Commission was led by Dr. Charles O’Brien, the Kenneth Appel Professor, Vice Chair of the Department of Psychiatry, and founding director of the Center for Studies of Addiction in the Perelman School of Medicine. The other members of the Commission were Vice President for Institutional Affairs Joann Mitchell (vice chair), Vice Provost for Education Andrew Binns, Dean of the College Dennis DeTurck, Vice Provost for University Life Valarie Swain-Cade McCoullum, Vice President for Public Safety Maureen Rush, and Senior Vice President and General Counsel Gary Williams.

The membership of the working groups is as follows:

Academic Impact Working Group

Dennis DeTurck, Chair
April Herring, then House Dean, Fisher-Hassenfeld College House, Vice Chair
Juliet Crain, C’16
Nancy Hanrahan, Assistant Professor of Nursing
Matthew Kalman, C’15
Rebecca Maynard, University Trustee Chair and Professor of Education
Jonathan Paz, C’15
Scott Romeika, Director of Undergraduate Admissions, Wharton
Reginald Stewart, C’15
Joseph Sun, Vice Dean for Academic Affairs, School of Engineering and Applied Science
Janet Tighe, Dean of Freshmen and Director of Undergraduate Advising, College of Arts and Sciences

Facilities Working Group

Andrew Binns, Chair
Marie Witt, Vice President for Business Services, Vice Chair
Thomas Hauber, Executive Director of Facilities, VPUL
Eugene Janda, Chief of Fire and Emergency Services, Division of Public Safety
Roman Petryk, Associate General Counsel
Scott Reikofski, Director, Fraternity and Sorority Life, VPUL
Stephanie Weaver, House Dean, Hill College House

Policies and Resources Working Group

Wendy White, Chair
Michele Goldfarb, Director, Office of Student Conduct, Vice Chair
Patricia Brennan, Director, Special Services, Division of Public Safety
Matthew Feldman, C’14
Brenda Fraser, Associate General Counsel
Max King, Associate Vice Provost for University Life
Julie Lyzinski Nettleton, Director, Office of Alcohol and Other Drug Program Initiatives
Felicity Paxton, Director, Penn Women’s Center, VPUL
Sharon Smith, Director, Student Intervention Services, VPUL

Student Safety Working Group

Maureen Rush, Chair
Jeanmarie Perrone, Associate Professor of Emergency Medicine and Director of the Division of Medical Toxicology in the Department of Emergency Medicine for the Hospital of the University of Pennsylvania, Vice Chair
William Alexander, Director, Counseling and Psychological Services
Dawn Anthony, C’15
Benjamin Evans, Executive Director, Office of Risk Management and Insurance
Maxwell Presser, C’14
Madeline Stevens, C’15
Evelyn Wiener, Director, Student Health Service
Paige Wigginton, then Associate Director, Student Intervention Services
Gary Williams, Lieutenant, University of Pennsylvania Police Department

Student Experiences and Perceptions

Valarie Swain-Cade McCoullum, Chair
Daniel Bernick, C’14
Elise Betz, Executive Director, Alumni Relations
Laura Bustamante, C’14
Eva Davis, Administrative Coordinator, VPUL
Erika Gross, Director for Finance, Administration and Risk Management, Student Health Service
Monica Yant Kinney, Executive Director, Communications and External Affairs, VPUL
Meeta Kumar, Associate Director, Counseling and Psychological Services
Noelle Melartin, Associate Director, Office of Alcohol and Other Drug Program Initiatives
Anthony Pratcher, GAS
Rodney Robinson, Associate Director, Office of Student Affairs, VPUL
Alanna Shanahan, Deputy Director of Athletics

The Commission benefitted tremendously from the information and advice imparted by the faculty, students and staff who served on working groups and who offered advice and assistance.3

3 The charge to each working group is provided in Appendix 1.
Context

Collegiate experiences “‘bring new challenges and opportunities; alter the nature of parental, school, and other types of support; and increase life’s complexity.” Therefore, it is important to consider the context and attendant experiences that affect Penn students as we work to ensure their safety. To do so, information available from student surveys and other qualitative data was reviewed. The PennAM (Penn Alcohol Module) survey of incoming Penn freshmen provided important baseline data about students’ behavior and attitudes prior to their arrival on campus. Students are administered a second survey six weeks after their arrival on campus. Of the students who responded to the PennAM survey in 2011, 65% said they had consumed alcohol during their senior year in high school and 37% said they had consumed alcohol in the two weeks prior to taking the survey. Notably, 13% of incoming freshmen reported that they had already engaged in binge drinking and 3% self-identified as chronic drinkers. The overall percentage of those who reported having engaged in high-risk and chronic drinking more than doubled between the time the pre-college survey was administered and the six-week follow-up (from 11% to 24% and 3% to 9% respectively). Students who participate in high-risk high school drinking were more likely to engage in higher risk drinking in college and to be subject to the negative consequences of that behavior.

These data are consistent with national trends for alcohol and other drug use which show age-related patterns of use, abuse and dependence. According to the National Institute for Alcohol Abuse and Alcoholism (NIAAA), roughly “four out of five college students drink alcohol” and “about half of college students who drink, also consume alcohol through binge drinking.” Additionally, the NIAAA’s College Fact Sheet states that each year “more than 100,000 students between the ages of 18 and 24 report having been too intoxicated to know if they consented to having sex” and roughly 25% of college students report that their drinking led to negative academic consequences.

The American College Health Association’s annual National College Health Assessment (NCHA) of college students offers insight into the impact of alcohol and other drugs on the behavior of college students. According to the 2013 NCHA study, roughly 23% of college students report that they do not drink alcohol. Another 14% reported having used alcohol less than once per month. In the same survey, when asked about their alcohol intake in the previous month, 48% reported drinking alcohol on 1 to 9 days per month, with 11% having reported drinking on 10 to 19 of the preceding 30 days. Close to 5% reported having used alcohol between 20 and 30 days in the month. With respect to other drugs, 62% reported that they had never used marijuana. Twenty-one percent indicated that they had used marijuana, but not in the last month, 17% reported some use in the previous 30 days, and roughly 3% reported having done so daily.

A notable feature of NCHA’s 2013 study is that students’ self-reported use of alcohol and other drugs contrasts dramatically with their perceptions of the utilization of these substances by their peers. For example, 31% of those responding indicated that the “typical student” uses alcohol between 10 and 19 days per month; however, the respondents’ self-reported use is only 11%. Similarly, 18% of the respondents indicated that the “typical student” used marijuana 10 to 19 days per month and their actual self-reported use was 2%.

Academic Impact

Penn students are asked directly about specific negative academic effects of drinking in annual Alcohol and Other Drug and Wellness surveys. The perceived impacts reported included missing a class or lab, performing poorly on a test or assignment, experiencing memory loss or a blackout, or attending a class while drunk or hung over. While there has been a slight decrease in some of these negative consequences over the 7-year period for which data are available, the impact continues to be a cause for concern. It is equally troubling that some students report experiencing more than one of the adverse effects listed above without recognizing them as “negative academic consequences.”

Between August 15, 2011 and May 14, 2013, 518 students had some interactions with the Division of Public Safety for alcohol-related behaviors (“alcohol referrals”). The grade-point averages of students who had interacted with the Division of Public Safety in this way for alcohol-related reasons were 0.10 to 0.15 (on a 4.0 scale) below those of their peers. Even these small differences are statistically significant. In many instances in which large numbers of students are eligible or apply for employment, graduate or professional school, or academic recognition (e.g., latin honors at graduation, Dean’s List, or membership in Phi Beta Kappa), grade point averages are used as one of several selection criteria and seemingly small differences can affect a student’s chances for success.

Academic consequences of alcohol or other substance abuse are discussed with incoming students during the summer prior to their freshman year in online materials, New Student Orientation, and other alcohol awareness presentations. Generally, there tends to be more focus on the social, sexual and long-term health-related consequences of alcohol misuse than on academic consequences. The impact of the misuse of alcohol and other drugs on students’ academic performance is another important topic that also will be emphasized. Publicizing the measurable impact of this behavior on academic performance is one useful way to increase awareness of this specific risk that can have long-term consequences. In addition, course instructors will be encouraged to report impaired behavior in class using the Course Problem Notice system. This step will allow advisors and support providers to detect potential abuse and attempt to address behavioral concerns before serious consequences result.

Facilities

The facilities used by students on campus must meet all appropriate safety regulations and standards. Additionally, students and staff in these buildings must be appropriately trained and all safety measures must be followed. The facilities include all on-campus housing (College Houses, Sansom Place, and fraternity and sorority houses) as well as University Life buildings and outdoor spaces on campus. The Commission collected data concerning the physical condition of student housing as well as information about safety procedures and preparation. Taken as a whole, we find that University-owned and managed buildings are safe and that occupants are provided with specific safety information and evacuation and shelter-in-place safety drills are carried out on a regular basis. Even in particular situations where the enforcement of standards has presented challenges, the University has taken steps to ensure that safety standards are met.

The Departments of Residential and Hospitality Services and Fire

5 For purposes of the PennAM surveys, binge drinking was defined as five or more drinks for males and four or more for females in a two-hour sitting. Chronic drinking was defined as binge drinking four or more times over a two-week period. For additional information, please see the Center for Disease Control’s fact sheet on Binge Drinking http://www.cdc.gov/alcohol/fact-sheets/binge-drinking.htm.
6 Office of Alcohol and Other Drug Program Initiatives survey, 2011.
8 Masten, et al.
10 Ibid.
12 Unless other behavior that violated University policy occurred, each student was followed. The facilities include all on-campus housing (College Houses, Sansom Place, and fraternity and sorority houses) as well as University Life buildings and outdoor spaces on campus. The Commission collected data concerning the physical condition of student housing as well as information about safety procedures and preparation. Taken as a whole, we find that University-owned and managed buildings are safe and that occupants are provided with specific safety information and evacuation and shelter-in-place safety drills are carried out on a regular basis. Even in particular situations where the enforcement of standards has presented challenges, the University has taken steps to ensure that safety standards are met.
13 For information regarding the Course Problem Notice system, please see http://www.college.upenn.edu/course-problem-notices
and Emergency Services are responsible for ensuring that all University residences, including the College Houses and the Sansom Place towers, meet all current building and safety codes. Students receive information regarding safety regulations in the building in which they reside. Resident assistants (RAs) and graduate assistants (GAs) who live in the College Houses attend a training session on fire safety led by Penn’s Chief of Fire and Emergency Services. Building evacuation and shelter-in-place drills are conducted throughout the year. Students also receive instruction from RAs and GAs that begins with the first floor meeting of the year as well as updates throughout the year via flyers, posters, and other communications. Additionally, daily fire safety videos and messages are broadcast on channels 2, 11, and 22 of the Penn Video Network.

Oversight of fraternity and sorority (Greek) houses is complicated by the issue of ownership. Of the 51 recognized Greek organizations, 34 have houses. Twenty-five of these houses are University-owned and managed, and the remaining nine houses are privately owned—four owned by fraternity alumni association chapters and five leased from local landlords. University-owned houses are regularly inspected, and evacuation and shelter-in-place drills undertaken. Ensuring that Greek houses have sufficient capital resources to comply with all appropriate safety standards presents challenges that the University is working to address. An advisory group, composed of representatives of the Division of the Vice Provost for University Life, including the Office of Fraternity and Sorority Life; the Division of Facilities and Real Estate Services; and the Office of General Counsel has drafted a capital plan for University-managed Greek houses and is developing an implementation plan that will require modest financial support from the University. The Commission supports the development of this strategy, which will allow University-owned Greek houses to carry out deferred maintenance and meet safety standards.

Most alumni work very constructively with the administration to ensure that University-managed houses adhere to safety standards and participate appropriately in initiatives. There has been occasional resistance to safety recommendations from the owners of non-University-owned houses due to financial constraints or to user indifference. The Commission found that the University continues to be unwavering in its demand that corrective measures be undertaken when deficiencies are identified.

In the spring of 2012, the University implemented a monthly safety inspection program for non-University-owned Greek houses. According to records maintained by the Division of Public Safety, currently all of these houses are in compliance. The University should continue to insist upon regular safety inspections and follow-up as a requirement for recognition of all Greek organizations. Further, the Office of General Counsel and the Division of Facilities and Real Estate Services will lead efforts to ensure compliance with safety recommendations for all residential houses, regardless of ownership or management. Also, non-University-owned houses will be required to systematically identify and address capital needs that could affect the safety of student residents or visitors. In addition, the Fraternity and Sorority Recognition Policy will be revised to more explicitly state that all houses—irrespective of ownership—must meet University safety standards in order to be recognized.

The Commission’s review of the data provided ample evidence that dangerous behavior is more likely to take place off-campus at unregistered events sponsored by individuals, underground fraternities, or other unaffiliated groups that may not be subject to University rules and protocols. The University does not have the capacity to mandate specific off-campus building safety—this is the responsibility of the landlords and owners of those buildings. The principal enforcement tool available to the University in these instances is the withdrawal of recognition—and even this sanction is not available if the group is not recognized by the University. In recent years Penn has engaged in a number of strategies to educate students who live off-campus as well as landlords about the potential risks and serious consequences that can result from buildings that do not meet proscribed safety standards. The Commission supports the continuation of these efforts.

Student Safety

Many staff, security officers, and “student first responders” encounter students in their most vulnerable moments when responding to emergency calls, treating them as patients, or providing counseling and support as they recover from the negative consequences of misusing alcohol or other drugs.14 The University offers extensive programming to educate students about the consequences of this behavior and to ensure the safety of its students. One of the most important mechanisms employed for this purpose is Penn’s Medical Amnesty Policy. The Policy is designed to encourage a student to call for assistance if he or she or another student needs medical attention due to alcohol or other drug use. Students who seek medical treatment for themselves or another student for the misuse of alcohol or other drugs will not be subjected to discipline for the sole violation of using or possessing alcohol or other drugs.15 When Penn adopted its Medical Amnesty Policy in 1999, it was among the first to do so. These policies are now widely accepted and are in place on numerous campuses across the country.

Students who are treated at Penn-affiliated hospitals for alcohol or other drug misuse are contacted by the Student Health Service for follow-up care and may be required to participate in the First Step program in the Office of Alcohol and Other Drug Initiatives.16 Cases also are reviewed by the Office of Student Conduct to determine whether the incident involved other behaviors that violate the Code of Student Conduct. In the event that a student has been transported to the hospital multiple times, he or she is required to attend a meeting with a representative of the Offices of Alcohol and Other Drug Program Initiatives and Student Intervention Services, and to participate in the First Step program and/or meet with a Counseling and Psychological Services staff member. If a student is transported to the hospital a second time (or more) due to alcohol or other drug use, the University reserves the right to notify his or her parents. In addition, if a student is under the age of 18, the University notifies his or her parents if they are transported to the hospital for the misuse of alcohol or other drugs. During academic year 2012–13, 36 parental notifications were made and in 10 of those cases follow-up care and support were required.

The Office of Alcohol and Other Drug Program Initiatives, in consultation with Student Intervention Services, Counseling and Psychological Services, Student Health Service, and the Division of Public Safety reviews weekly transport reports to identify trends, current issues, and potential problematic behaviors. In addition, campus partners have developed and/or supported the following programs:

• During academic year 2012-13, the University developed a pilot program to provide incentives for students to register on-campus parties and fully comply with mandated security and alcohol requirements. The pilot, which includes assistance with covering the cost of approved security and trained bartenders, was extended into academic year 2013-14, and its effectiveness is being reviewed.

• Penn’s student-run Medical Emergency Response Team (MERT) provides supplemental emergency medical services to the campus community between 5:00 p.m. and 7:00 a.m. every day during the academic year when classes are in session. Their services are especially evident and valuable during major events such as New Student Orientation, Spring Fling, Hey Day, and Commencement. MERT members, who are certified emergency medical technicians in the Commonwealth of Pennsylvania, typically respond to a call in less than five minutes. MERT members are trained to identify students who need medical intervention for alcohol or other drug misuse. Counseling and Psychological Services provides additional training to MERT members, including training on prescription drug misuse.

• All alcohol-related medical transports are reported to the Office of Alcohol and Other Drug Program Initiatives to ensure appropriate follow-up.

14 Student first responders include MERT team members, resident advisors, and graduate advisors.
15 Please see http://www.yuld.upenn.edu/alcohol/amnesty.php
16 Please see http://www.yulp.upenn.edu/alcohol/firststepprogram.php
up counseling, care, or other interventions.

- During special events like Hey Day and Spring Fling, staff members from the Divisions of the Vice Provost for University Life, Facilities and Real Estate Services, and Public Safety as well as College Houses and Academic Services, work as a team to prevent and respond to problematic alcohol-related behavior.

- Penn Police regularly patrol residential areas in its jurisdiction and respond to complaints, including reports of excessive noise, loud music, and disturbances resulting from parties. These proactive and reactive strategies are important tools providing the basis for referrals to the Office of Student Conduct or another campus resource office, landlords, the Philadelphia Police Department and ultimately to the Nuisance House Committee.  

  Penn Police also work closely with other law enforcement partners, including the Pennsylvania Bureau of Liquor Control Enforcement and the University City District to ensure that privately-owned businesses and alcohol distributors abide by state and local laws.

- Protocols have been developed by the Office of Alcohol and Other Drug Program Initiatives, the Office of Fraternity and Sorority Life, the Division of Public Safety, and other campus partners for registering parties and events and ensuring that bartenders are appropriately trained and adequate security is available. In addition to incentives to encourage students to register parties, sanctions have been established and are well publicized to deter under-aged drinking and misuse of drugs by Penn students on- and off-campus.

- In 2012, the language in agreements for students who live in dormitories and University-owned fraternity and sorority houses was amended to make clear that students, and in some cases their parents or guardians, may be liable for behavior that endangers other members of the University community.

- The Offices of Alcohol and Other Drug Program Initiatives, Student Intervention Services, Counseling and Psychological Services, and Student Health Service work in close partnership to ensure that students have access to the appropriate information and care for any substance abuse or misuse, addiction, and related issues and understand the negative consequences that can result from the misuse of alcohol and other drugs. In addition, these offices work in close collaboration to ensure that affected students and those impacted by their behavior have access to appropriate care, support, and treatment options.

- The University offers a wide array of educational programming on responsible alcohol consumption, including:
  - New Student Orientation includes information on safety and responsible conduct as well as University policies prohibiting the misuse of alcohol, interpersonal violence, sexual violence, and hazing. The link between these inappropriate behaviors and the misuse of alcohol and other drugs is also discussed.
  - Specialized training for lead alcohol monitors, Interfraternity and Panhellicn presidents, and social chairs each semester as student leadership transitions occur.
  - Fraternity and sorority members receive training regarding University policies related to alcohol, sexual assault, and consent.
  - Penn Police officers meet periodically with fraternity and sorority chapters to discuss responsible conduct and University programs designed to ensure their safety.
  - Staff members from the Divisions of the Vice Provost for University Life and Public Safety visit the residences of students who live off-campus and advertise parties scheduled during New Student Orientation to ensure that they are aware of behavioral expectations under University policy and Pennsylvania law.

- Throughout the year, the Division of Public Safety participates in information dissemination activities to discuss responsible conduct strategies.

- Every year, the Division of Public Safety and the Office of Audit, Compliance, and Privacy provide the coaches of all men’s and women’s teams in the Division of Intercollegiate Athletics and Recreation with training on Penn’s behavioral standards and expectations regarding alcohol and other drugs, the definition of consent, and the University’s Sexual Violence Policy.

- Student hotline volunteers are trained to support the University’s sexual assault reporting systems.

- Students are informed of the University’s Medical Amnesty Policy and that seeking medical attention for alcohol abuse alone will not result in disciplinary action. Students are advised, however, that violations of other behavioral expectations, such as damaging another’s property, will subject a student to disciplinary action.

The University also has been proactive in educating students about the relationship between excessive alcohol consumption and interpersonal and sexual violence. The Penn Women’s Center, the Division of Public Safety, the Office of Alcohol and Other Drug Program Initiatives, and the University’s Title IX Officer play key roles in providing training and ensuring that resources are in place to prevent and respond to questions regarding complaints of sexual assault. Penn’s outreach efforts extend to both domestic and international students with a particular focus on the issue of consent and the inability of a person incapacitated by alcohol or other drugs to provide it. Faculty, staff and students have been trained as anti-violence advocates. Student groups also have been important partners in educating their peers about sexual assault, its impact, and its consequences. Additionally, every year resident advisors and graduate assistants receive training to help them recognize the signs of abuse and ensure that they are aware of the University’s array of policies, resources, and supports.

The University was fortunate to have been awarded a Violence Against Women Act grant that was subsequently renewed on two occasions. A portion of the grant, which was originally awarded to a consortium that included Drexel University and the University of the Sciences, supported the design and implementation of a Penn-specific training module for all Penn Police, AlliedBarton security officers, and PennComm dispatchers in the Division of Public Safety. Beginning in academic year 2011-2012, all Penn Police and PennComm dispatchers were required to participate in an 8-hour mandatory training on recognizing and responding to sexual assault and domestic violence.

As provided by the University’s Sexual Violence Policy, all parties to a complaint of sexual assault are advised of their rights and responsibilities. The University has detailed procedures for assisting students (and other members of the community) who are sexually assaulted by providing information and support throughout the process of filing criminal charges or filing a formal complaint with the Office of Student Conduct. Complainants are provided with medical and psychological support and detailed information regarding internal and external complaint processes. Respondents are informed of their rights and provided with information about counseling and other resources available to assist them. The Penn Women’s Center, the University’s Title IX Officer, the LGBT Center, the Special Services Department, and other offices have posted guidance for students on readily accessible websites.

The Commission found that the University’s already expansive network of services was effective in treating and supporting students who are...
transported to the hospital for treatment of alcohol or other drug-related issues. To facilitate treatment by physicians in the Emergency Department at the Hospital of the University of Pennsylvania, healthcare providers will be advised that PennComm is able to contact MERT or other first responders to provide supplemental information. In addition, staff representatives of the Student Health Service, the Division of Public Safety, and the Office of Alcohol and Other Drug Program Initiatives have begun periodic meetings with physicians, nurses, and registration staff to ensure that they are familiar with University policies, particularly the Medical Amnesty Policy, follow-up procedures carried out by Student Health Service; and educational programs offered by the Office of Alcohol and Other Drug Program Initiatives. On occasion, students may refuse treatment due to concerns regarding parental notification, insurance coverage and related financial implications, or for other reasons. This information exchange will ensure that Emergency Department staff are prepared to refer the student to an appropriate resource in the Divisions of Public Safety or the Vice Provost for University Life.

In the past, the University had not systematically recorded blood alcohol content (BAC) of students who were treated by Penn Medicine’s Emergency Departments. Providing this information to students who have been treated would be instructive for the students being treated, while at the same time helping staff members who provide follow-up support and education understand the student’s level of toxicity. The Directors of the Student Health Service, Office of Alcohol and Other Drug Program Initiatives, and the Emergency Department at the Hospital of the University of Pennsylvania are working on a pilot program to routinely collect and analyze BAC levels in a way that is HIPAA compliant and allows for the identification of trends and supports outreach and education efforts. The pilot will include an analysis of other relevant information and circumstances including any injuries, repeat Emergency Department visits, necessary medical treatment and any physical or sexual assaults on others. Also, if a MERT team member is on duty, an assessment will be requested for students cited by Penn Police for alcohol-related issues to aid in determining whether medical attention is needed. The Division of Public Safety will coordinate with Penn Medicine’s Emergency Departments to offer a walking or riding escort home for Penn students following treatment.

The Pennsylvania Bureau of Liquor Control Enforcement (BLCE) has increased its presence on college and university campuses across the Commonwealth. The BLCE contacted the Division of Public Safety in 2013 to outline its educational and enforcement campaign combatting underage drinking. Subsequently, the BLCE, with the cooperation of Penn Police, carried out an enforcement campaign during Spring Fling which resulted in the issuance of 31 citations (as compared to 3 citations issued during calendar year 2012). BLCE’s presence reminds students of their responsibilities to the broader community at large, particularly West Philadelphia residents and neighbors who have expressed frustration with off-campus parties. The Commission supports the University’s continued cooperation with BLCE’s efforts to enforce the laws of the Commonwealth.

**Policies and Resources**

Over the years, Penn has adopted extensive strategies, policies and programs which are supported by a wide array of resources to prevent and respond to the misuse of alcohol and other drugs on campus and the high-risk behavior that can result. Students receive information about the Code of Student Conduct during New Student Orientation and during meetings with residential and graduate assistants in the College Houses. All students receive periodic reminders of their rights and responsibilities as members of the community which are outlined in PennBook and the Code of Student Conduct, including specific information regarding policies regarding alcohol and drug misuse, medical amnesty, hazing, sexual harassment, sexual violence, and the recognition and governance of fraternities and sororities. A number of University resource offices have specific programmatic initiatives and staff dedicated to ensuring that students are aware of these policies and their attendant rights and responsibilities. In particular, staff members within the Division of the Vice Provost for University Life’s Offices of Alcohol and Other Drug Program Initiatives, Student Intervention Services, Fraternity and Sorority Life, Student Health Service, Counseling and Psychological Services, Penn Women’s Center, and LGBT Center lead education, prevention and response efforts.

The Division of Public Safety’s Special Services and Penn Police departments are actively engaged in ensuring campus safety, the prevention of sexual and other interpersonal violence, and the provision of support and information for students regarding University policy and the laws of the Commonwealth. The Office of Student Conduct plays an important role in providing information about the Code of Student Conduct in addition to carrying out its role in adjudicating and mediating complaints of violations of behavioral expectations. The University’s Title IX Officer (Executive Director of the Office of Affirmative Action and Equal Opportunity Programs) coordinates regular meetings of resource offices to develop and implement strategies for preventing and responding to sexual harassment and sexual violence. The University’s policies and enforcement protocols are designed to prevent and reduce alcohol misuse and the dangerous behavior that results. Despite these efforts, Penn has not been immune to serious incidents involving the misuse of alcohol.

In the College Houses, matters of alleged serious misconduct are first reviewed by the Faculty Master and House Dean of the relevant facility. College Houses have from time to time taken different approaches to dealing with alcohol issues, resulting in some inconsistencies in the application of the rules and the imposition of sanctions across the College Houses. The College House and Academic Services will review its existing protocol and practices to ensure a standardized, consistent approach to alcohol and other drug related incidents across the system. The Director of College Houses and Academic Services will be charged with monitoring the implementation of the protocol to ensure consistency of enforcement.

The evidence shows that dangerous behavior is more likely to take place off-campus at unregistered events sponsored by individuals, underground fraternities, or groups established by recognized fraternity houses for the sole purpose of evading the University’s alcohol rules and protocols. The University does not have the ability to control this behavior or discipline these individual groups in the same way it manages on-campus behavior. This disparity is not the result of any unwillingness to enforce the rules, or an application of different standards, but because the University does not have the same ability to police conduct occurring off-campus. Penn, as is the case for other colleges and universities, does not have an effective mechanism to require the registration of off-campus parties. The principle enforcement tool available to the University with respect to on-campus groups is the withdrawal of recognition; a sanction that is not an option if the group is not recognized. In recent years, the University has engaged in a number of strategies to impress upon students living off-campus the dangers of high-risk behavior and the serious consequences that can result. Particular emphasis is placed on the range of sanctions that can be invoked for violations of the Code of Student Conduct and other University policies as well as applicable civil and criminal penalties. Nevertheless, the problem remains a matter of concern.

To further strengthen the University’s already significant resources available for education, prevention, and response to the misuse of alcohol and other drugs, the Commission supports continued efforts to disseminate information to students and their parents prior to their arrival on campus and at strategic intervals throughout their undergraduate experience, particularly during New Student Orientation, leadership development training, and for those planning Spring Fling, concerts, Hey Day, and other celebratory events. Peak times for applying for off-campus housing and pledging and rush activities for fraternities and sororities should continue to be focal points for additional education and information dissemination efforts. One important aim of this intensified communication strategy is...
to increase awareness of incidences of high-risk behavior related to the misuse of alcohol and other drugs and the attendant consequences.

**Student Experiences and Perceptions**

First-year students arrive at Penn from across the country and around the world at a pivotal time in their personal and physiological development. It is a time of risk taking and sometimes less than optimal decision-making. Developmentally, it is also a time when the misuse of alcohol and other drugs, which increasingly begins during high school (or before), can lead to negative cognitive, physical, emotional, mental, and sexual consequences. A number of studies corroborate the potential for the misuse of alcohol or other drugs to impede the development of social and academic competence crucial to adult development.27 While there has been a slight decrease in the use of some of these substances over the years, they remain at levels that are cause for concern.

Of the Penn students responding to the Enrolled Student Survey in 2011, 96% reported that Penn is very “competitive;” 71% reported spending 11 to 25 hours per week in class; 67% said they spent 11 to 30 hours per week studying; 68% spent 1 to 10 hours per week engaged in extracurricular activities; and more than 50% reported working for pay. Given the competing demands students are juggling, it is not surprising that 58% of Penn undergraduates consistently report feeling overwhelmed “often or very often” and only 7% reported that such feelings are “rare.”23 In a pilot study of Penn undergraduates, when asked about methods of stress reduction, 39% of respondents said they use alcohol or other recreational drugs to combat stress.24 It also should be noted that 10% of entering freshmen reported on the PennAM survey that they had smoked marijuana in high school. Less than 1% indicated that they had used cocaine, prescription stimulants or opiates. In the follow-up surveys in October and February, students who reported pre-college alcohol and/or marijuana use reported statistically significant increases across all high-risk alcohol and other drug behaviors compared to their non-pre-college use counterparts.

Alcohol use trend lines show differentials by membership in affinity groups and housing as well as by gender within those categories. Athletes and members of Greek organizations (especially those living off-campus) present some of the most troubling statistics. These data are consistent with the results of a 2011 national study indicating that affiliation with Greek organizations and athletic teams is associated with heavier drinking as well as a higher frequency of drinking and heavier consumption.25

Estimates regarding the percentage of college students who will be sexually assaulted vary.26 Notwithstanding the variation in national estimates, even one instance of rape or sexual violence on campus is unacceptable.27 In surveys administered by VPUL, students reported having been subjected to interpersonal violence between their freshman and senior years at similar rates, which is consistent with the data collected by peer institutions.28 These reports led to the development of the “Call It What It Is” poster campaign that resulted from a collaboration between

23 Enrolled Student Survey, 2011.
24 A 2011 National College Health Assessment II, Student Health Service study included 1,384 respondents 536 of whom reported using alcohol or other drugs to deal with stress.
28 Office of Alcohol and Other Drug Initiatives, Penn Violence Prevention and Counseling and Psychological Services internal reports.

the Penn Women’s Center, Penn Violence Prevention, Division of Public Safety, and student leaders. These posters were conceived by student-led committees and are intended to speak clearly and directly to students to describe specific behaviors that define interpersonal violence and sexual violence. The poster campaign also raises awareness for Penn’s zero tolerance policy regarding interpersonal violence and institutional commitment to maintaining a non-hostile environment.

Some freshmen perceive fraternity and sorority parties to be the primary means for first-year students to interact socially with upperclassmen. The Commission recommends continuing to provide innovative pre-orientation programs and peer mentoring to allow our newest students a wider range of healthy social options.

Importantly, 94% of freshmen indicated that they know about the Medical Amnesty Policy and 77% reported that they would “much more likely” to seek treatment if needed.29 In fact, between July 2011 and June 2013, 449 students were beneficiaries of Penn’s Medical Amnesty Policy (247 freshmen, 88 sophomores, 43 seniors, 22 graduate/professional students, and 8 whose status was not recorded).30 While freshmen are the greatest beneficiaries of the Medical Amnesty Policy, all students benefit from understanding and utilizing this proactive, harm reduction-based policy.

Prior to arriving at Penn, none of the respondents to the PennAM surveys (male or female) reported having experienced unwanted sexual intercourse as a result of drinking. Of freshmen who responded to the survey six weeks after arriving on campus, 5% reported having experienced unwanted sexual touching, and 1% reported having engaged in high-risk, unprotected sex.31 In the 2012 PennAM survey, 2% of undergraduate respondents acknowledged having taken advantage of someone sexually as a result of alcohol or drug use.32 Students living off-campus, members of fraternities or sororities, and student-athletes who drink or use drugs report experiencing negative consequences as a result of this behavior at higher rates than do other Penn undergraduates.

Many Penn students report employing strategies to mitigate the possibility of negative consequences; 49% indicated that they alternate between alcohol and non-alcoholic beverages, and 52% say they consume no more than two drinks per hour. In spite of detailed knowledge about ways to drink smarter and safer, 87% of freshmen and 62% of all students say they “pre-party,” and 26% of all undergraduates reported drinking on empty stomachs. A comparable number of freshmen (22%) said they had mixed alcohol with other drugs.33 These findings have inspired and influenced the “Alcohol: It’s a Science” poster campaign. The Commission recommends continued innovation based on best evidence in the development of educational programming and materials.

**Conclusion and Recommendations**

The University has been proactive and inventive in its efforts to reduce the misuse of alcohol and other drugs and the negative consequences that can result. Penn will continue to be vigilant in providing information and support to ensure the safety of all students. The increased coordination and collaboration that was spurred by the announcement of the Commission already has resulted in additional programmatic and strategic initiatives that are designed to enhance the effectiveness of the University’s efforts to reduce unnecessarily risky behavior and its negative consequences. Importantly, the University will continue to consistently enforce existing policies and protocols at the same time that it redoubles efforts to ensure that students are aware of the consequences of the misuse of alcohol and other drugs. As is the case for all safety issues, this is a shared responsibility that requires the concerted and sustained attention of students, their families, staff, and faculty. The Commission commends the University on the many steps that have already been taken to ensure the safety of Penn students.
students and recommends several additional steps to further strengthen those efforts.

- First, the Commission recommends the establishment of an additional position to provide safety education for students. This individual would focus his or her attention on the development and implementation of innovative education and outreach programs to ensure that students have access to information about available University resources and support and their rights and responsibilities. The incumbent would also focus on educating students about interpersonal violence, sexual assault, and hazing prevention in collaboration with other campus resource offices. The University already has a number of staff members who devote a significant fraction of their time to these activities. The addition of a staff member whose principal focus is the provision and coordination of these efforts would enhance the effectiveness of Penn’s current efforts. It also would allow the University to intensify its focus on outreach to students prior to their arrival at Penn, during New Student Orientation, and throughout their enrollment at Penn.

- Second, the Commission recommends periodic assessments to ensure that the appropriate resources and supports are in place to maintain and extend strategic and programmatic efforts to prevent the misuse of alcohol and other drugs, interpersonal violence, sexual assault, and hazing. We fully recognize that the University has made significant investments in staffing, programming, and educational materials. It is important to remain vigilant for opportunities to redeploy and redirect or to provide additional resources to ensure that we are taking all reasonable steps to ensure the safety of our students.

- Third, the Commission recommends that the University continue to create, promote, and refine its efforts to prevent the misuse of alcohol and other drugs and associated negative consequences, including academic under-performance, interpersonal violence, sexual assault, and hazing. The initiatives the University already has in place must be continually revisited and their effectiveness and reach evaluated to ensure that the widest possible audiences of students—both individually and as members of student organizations—are being reached. We fully support the continued engagement of students, those in formal and informal leadership positions, in the design and development of strategies and programs that will be the most effective.

As President Gutmann and Provost Price noted when the Commission was established, no college or university campus has been untouched by the effects of the misuse of alcohol or other drugs. The University has been at the forefront of efforts to ensure the safety of its students and we commend the students, faculty, staff and alumni who have helped to make this so. At the same time we urge that efforts be continually renewed and refreshed to optimize the effectiveness of initiatives to educate students and prevent high-risk behaviors that can have long-lasting consequences.

Appendix 1
Commission on Student Safety, Alcohol and Campus Life
Working Groups

Academic Impact (Dennis DeTurck):
The Academic Working Group (AWG) will review a variety of data sources to determine the impact that alcohol and related behaviors have on students’ academic performance and retention. The AWG will review relevant research regarding best practices and data that relate to the role that alcohol plays in academic performance.

Facilities (Andrew Binns):
The Facilities Working Group (FWG) will assess the physical and environmental structures within the Penn community and how they impact student safety. Specific attention will be paid to student housing structures, including fraternity and sorority houses and off-campus residences. The FWG will review frequency of safety regulation checks, related incident reports and safety codes to determine whether Penn is maintaining effective practices.

Policies and Resources (Wendy White):
The Policies and Resources Working Group (PRWG) will review campus policies and practices that relate to safety, alcohol use and sexual violence on campus. The PRWG will focus specifically on policy enforcement efforts as well as student perception of policy enforcement. The PRWG will review research regarding best practices for alcohol and safety related policies.

Student Safety (Maureen Rush):
The Safety Working Group (SWG) will assess Penn’s safety-related practices and protocols for incidents as they relate to alcohol use/behaviors, sexual violence and other related safety concerns. The SWG will review data regarding alcohol-related incidents from multiple sources on campus as well as review practices and support mechanisms that are in place for students; including services such as escorts and transit services and support for students in crisis. The SWG will review research regarding best practices regarding campus safety measures and practices.

Student Experiences & Perceptions (Valarie Swain-Cade McCoullum):
The Student Experiences and Perceptions Working Group (SEPWG) will take a broad look at the experiences and traditions (including Hey Day, Spring Fling, rushing/pledging rituals, athletics team rituals, etc.), student perception of social norms around alcohol use and related behaviors both on- and off-campus and the role/impact of various media and other entities such as the DP, 34th Street, etc. The SEPWG will assess relevant campus resources and services and identify best practices for creating a low risk culture around alcohol on college campuses.