Fraternity and Sorority Governing Councils
Risk Prevention Policies and Procedures
West Chester University of Pennsylvania

Guidelines for Event Management
and Other Areas of Fraternity and Sorority Risk Prevention

Approved as of April 4, 2016
Fraternity and Sorority Governing Councils
Risk Prevention Policies and Procedures

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*references in this document that use “Fraternity” are direct from applicable policy sources and should be interpreted as inclusive of both fraternities and sororities.

**Purpose of Risk Prevention**

The purpose of implementing proper risk prevention practices is two-fold: to educate the campus fraternity and sorority community of their responsibilities in the areas of risk prevention and to promote self-governance through the disciplinary process with chapters that violate policies and procedures. Our hope is to eliminate any unnecessary risk to any organization or member belonging to the fraternity and sorority community at WCU.

There is inherent risk that comes with the administration of fraternities and sororities. This policy document contains many important pieces of information regarding all areas of risk prevention: complex event management, social host responsibility, hazing, sexual misconduct/harassment, fire safety, etc.

The FIPG risk management policy is the official risk management policy for all WCU fraternities and sororities and will be implemented and enforced by each governing council and the Office of Fraternity and Sorority Life. All member chapters and members of each governing council are expected to abide by the policies of FIPG as implemented by West Chester University or their individual national or inter/national risk prevention policy, whichever is stricter. These social policies apply to all fraternities and sororities and all levels of membership.

The FIPG Risk Management Manual (Produced by FIPG, Inc., a risk management association of men’s and women’s national and international fraternities and sororities) is the main source of knowledge that informs this policy document and is available as a resource on the Fraternity and Sorority Life website.

Any violation of the policies and procedures referred to in this policy document or those stated in the Ram’s Eye View and Student Code of Conduct will be referred to the appropriate governing council judicial board for immediate action. Depending on the severity of the alleged violation, a chapter could also be directly referred to the Office of Judicial Affairs and Student Assistance.

**West Chester University Ram’s Eye View & Student Code of Conduct**

http://www.wcupa.edu/_services/stu.lif/ramseyeview/

We, the members of the WCU campus community…

…treasure what we believe to be the highest principles of American society; the worth and uniqueness of each individual, the belief that success is to be earned by individual effort put forth in an environment founded on quality of opportunity and the appreciation of the ideal of an inclusive society.

…believe that it is incumbent upon all members of our community staff, students, faculty and administrators to conduct themselves with civility toward one another at all times.

…further affirm the worth and dignity of each member and the shared responsibility to treat each other as individuals, with respect and courtesy.

(Taken from the West Chester University’s Values Statement.)
Risk Prevention Philosophy

The following is paramount to our community in planning and executing safe programs and events.

- Safety of all students
- Education of the policies for all members
- Exemplifying our respective fraternal values in redefining the perception of what it means to be a social fraternity or sorority.

Defining Complex Events

In order to have policies and procedures that can equally apply to all fraternities and sororities with a variety of large scale programming, the following are the different categories of chapter sponsored events that are applicable:

1. Special Event On Campus – Special events are any event held on campus, including but not limited to a dance, party, concert, or show. These are events other than standard meetings possibly requiring a special setup, food, Public Safety, electrical needs, special hours, and which may necessitate the use of Public Safety coverage to ensure a safe and secure environment for all WCU students and their guests. All special event requests are made on 25Live at least three (3) weeks in advance of the program date. These programs often require a meeting with the Assistant Director or the reservationist of Sykes Union, and a representative from Public Safety to discuss program details.

   a. Due to the confidentially required, New Member Shows/Neophyte Presentations are a separate approval process through the Director of Fraternity and Sorority Life. Performance guidelines can be found on the Office of Fraternity and Sorority Life website.

2. Philanthropy Event – these events are sponsored by the chapter, usually involve 100 or more participants.

3. Off Campus Event with Alcohol – these events involve any number of members and non-members, taking place at a Third Party Vendor, or ANY LOCATION where “Social Host Responsibilities” are expected. (See #1 of FIPG Social Host Responsibilities)

   a. The possession, sale, use or consumption of ALCOHOLIC BEVERAGES, while on chapter premises or during a fraternity event, in any situation sponsored or endorsed by the chapter, or at any event an observer would associate with the fraternity, must be in compliance with any and all applicable laws of the state, province, county, city and institution of higher education, and must comply with either the BYOB or Third Party Vendor Guidelines.

SPARC Program Planning Guide

The Program Planning Guide (PPG), written by the Student Program Activity Review Committee (SPARC), is offered to provide information to recognized student organizations at West Chester University about policies, procedures, and resources. It should be used in planning all on campus programs and events.


Complex Event Management Procedures

A. Planning and Execution

1. All chapters wishing to host a Complex Event must complete a “Primary Event Notification and Planning Form” in advance with their respective governing council.
a. A “Planning Form” must be submitted 14 days in advance of a complex event that describes the following;
   i. Location
   ii. Organization(s) sponsoring event
   iii. Themes/unique attributes of event

b. For type of event, there may be different documentation required to fulfil approval conditions, therefore, there are three separate Planning Forms for each type of event, which will be submitted electronically.
   i. Special Event On Campus
   ii. Philanthropy Event
   iii. Off Campus Event with Alcohol
      i. An updated House Form must be submitted at the start of each semester that identifies specific attributes of the location that complex BYOB events will be held that describes the following;
         i. Address
         ii. Number of entrances and exits
         iii. Maximum House Occupancy
         iv. Attributes of Distribution Center

4. After submitting the form to the respective governing council Vice President, this officer will review the information and assist the chapter in planning efforts. If any possible policy violations are apparent, feedback will be offered within one week of its submission date. If any updates or clarification is needed from the original form, this will be communicated between the chapter and the respective governing council Vice President.

5. Once the chapter has completed all the necessary requirements for the event, the governing council officer responsible will notify the chapter when all materials have been received. The governing council is not necessarily “approving” the event; however communication is simple to acknowledge that the necessary planning steps have been completed.

6. In conjunction with each governing council, Inter Greek Council Programming Board will host an optional calendar planning meeting at the end of the spring semester. The purpose of this meeting will be for chapters to identify dates on the calendar for the next academic year in which it would like to host Complex Events.
   a. Representatives from the Sykes Event Reservation staff will be present for this meeting and will hold the space until the first day of class of the respective semester.
   b. A process for how this meeting will be executed will be approved by each governing council.
   c. The BLGC Programming Dates will have already been identified prior to this meeting.

B. Advertising
1. Chapters will utilize the University’s 25 Live reservation system, which is linked to the University-Wide calendar publication process.
2. Chapters will not advertise any event or program in which approval of space has not been obtained.
3. Chapters will adhere to all WCU Advertising policies and procedures.
http://www.wcupa.edu/_services/stu.lif/ramseyevieview/activities/adpolicy.asp

4. All chapters will ensure that all advertisements, promotions, and other publicly displayed items will be in good taste (reflect fraternity/sorority values) and with regard to the local chapter, its governing council, the men’s and women’s national and international organization.

5. At this time, an approval process for individual posters and t-shirts is not legislated, however, if a chapter is found to have publicized not in good taste, it will be referred to the Governing Council Judicial Board.

C. Accountability
1. Chapters which events off-campus (with or without alcohol) are accountable under these regulations for behavior at the event. Individuals are also responsible to the University for their conduct at such events.

2. Students are expected to abide by University regulations and laws of the Commonwealth of Pennsylvania with respect to alcohol. The West Chester University rules and regulations include the provision that the governing council judicial boards can adjudicate off-campus events.

D. Attendance and access
1. All Events - The sponsoring chapter is responsible for setting up the process to control access to the event.
   a. Security Personnel: Throughout the planning process, it may be determined that additional security personnel are required.
      i. The sponsoring group will be responsible for payment for security personnel.
      ii. The security personnel must have the appropriate training and experience necessary.

2. Events with Alcohol
   a. Attendance at events at which alcohol is consumed, possessed, or served by a Third Party Vendor shall be restricted to members and their personally escorted guests (non-WCU students are permitted). All guests must be on the guest list.
   b. The sponsoring group is required to control access to the event. Additional security personnel are required. The sponsoring group will be responsible for payment for security personnel, which or may not be included in the rental fee to a Third Party Vendor.
   c. A private area inside a larger location is permitted as long as the access to the private area is managed.

E. Time restrictions
1. All Events
   a. All events, on campus or off campus, no matter what the size or scale will not interfere with the academic priorities of members.
   b. If a chapter wishes to host a program during finals week, it will be in support of academic success and the event management will not impede on individual member academic priorities.

2. Events with Alcohol
   a. Social events at which alcohol is consumed, possessed, or served by a Third Party Vendor may take place only between the hours of 6 p.m. to 2 a.m.
   b. Chapters must check alcohol into the Distribution Center at the predetermined time agreed upon by participating chapters.
   c. Wristbands must be distributed to the chapters at a predetermined time.
d. A specific start time and end time will be specified, and sponsoring organizations will not permit an event to “open” after the end time.
ed. Social events at which alcohol is consumed may not exceed a four (4) hour length of time, and no organization may register more than one event on any given day.
i. Exceptions will be made twice a year for events with the main purpose of including family and alumni.
f. Overnight events with alcohol are not permitted.
g. Chapters can only host events with alcohol when school is in session during the fall and spring academic semesters.

F. Violations and penalties
All violations of the WCU rules and regulations, the governing council constitutions, the FIPG guidelines, and any other policies that apply to fraternities and sororities, will be referred to the respective governing council judicial board or directly to the Director of Judicial Affairs and Student Assistance. Please see the respective governing council constitution for the judicial procedures.

Philanthropy Event Guidelines

Statement of Purpose
One of the most rewarding aspects of fraternity and sorority life can be the sense of pride that comes with involvement in philanthropy events, which help raise money and awareness for local and national service agencies, and positively portrays the fraternity and sorority system. The fraternity and sorority governing councils are responsible for ensuring that such events are consistent with national, University, and council standards and values. In doing so, it is necessary that all philanthropic events organized are congruent with the values and rituals we live by as members of a larger fraternity and sorority community.

The fraternity and sorority governing councils will each appoint a Vice President to monitor that all philanthropy events that any fraternity or sorority chapter hosts on or off West Chester University’s campus follow University and Council policy. In creating and enforcing guidelines listed below, we hope to maintain a positive outlook of fraternity and sorority life at WCU.

Please note that the following guidelines are applicable to all fraternities and sororities. Failure to meet this standard and abide by the process will result in an immediate referral to the chapter’s respective governing council Judicial Board.

Values Based
For organizations that struggle to defy stereotypes, it is imperative that our programs and activities do not give credence to those who do not take our relevance seriously. All philanthropy events must be in good and positively represent the fraternity and sorority community. (Examples of events that are not appropriate: sitting on toilets.)

1. All events will provide educational material on the philanthropic cause of the event to attendees and participants.
2. All events will create a visual display (large poster, banner) that will communicate the philanthropic cause of the event.
3. After the Event Notification and Planning Form has been submitted, any event that is questionable will be brought to the respective governing council executive board to for evaluation.
4. These events shall in no way be associated with the consumption or distribution of alcohol or drugs. Events cannot be cosponsored with a Third-Party-Vendor.
   a. For “Dine and Donate” events, all those participating will not consume any alcohol.
5. Events should have no references to alcohol or drug use, nudity, racism, sexism, or any other such derogatory or inappropriate behavior.
6. In the event of a competition between chapters there should be no disparaging remarks made about other chapters.
7. If the event involves the participation of other chapters in the community, outreach about the program is required to be distributed to ALL chapters (of all three governing councils) represented at WCU.
8. All “pageant events” must be outlined in detail and submitted as part of the Event Notification and Planning Form.

Advertising
1. In coordination with the Vice President of Public Relations for the chapter’s respective governing council, the Office of Fraternity and Sorority Life Staff will also assist in marketing the event on campus. If chapters wish to write a press release, this will be sent to the Director of Fraternity and Sorority Life, who will then direct it to the WCU Public Relations and Marketing staff.
2. Publicity for an event cannot take place until the event has been approved. (per the SPARC Planning Guide)

Time Restrictions
1. Any event that involves the participation of other chapters, organizations, and their members cannot be longer than 24 hours.
2. No more than two events can be held per week that necessitates the participation of other chapters and their members. A calendar of approved events will be maintained and distributed.
   a. If more than two organizations submit Event Planning Forms (that requires the participation of other chapters and their members) during the same week, the dates will be awarded to the organization that has completed the registration steps first. (This is to prevent the overlapping of events and promote the best attendance possible).
3. If a chapter wishes to host a week-long series of events, only one of these events would require the participation of other chapters and their members. The other events would be for marketing, education and awareness.

Planning and Execution
1. For large scale philanthropy events, each chapter must submit an Event Notification and Planning Form at least 21 days before the event.
   a. This form will require confirmation that a space request has been obtained through the on-campus reservation system (25Live).
   b. After submitting the online form, the respective governing council Vice President will review the information submitted and assist the chapter in planning efforts. If any possible policy violations are apparent, feedback will be offered within one week of its submission date. If any updates or clarification is needed from the original Event Notification and Planning Form, this will be communicated between the chapter and the respective governing council Vice President.
   c. All necessary University approvals must be obtained at least 7 days prior to the event. (The 25 Live request has moved from tentative to confirmed)
      i. If there are any circumstances that delay University staff approval, this must be communicated at least 7 days prior to the event.

Reporting
1. Chapters must complete the Service Event Form out of the Office for Service Learning and Volunteer Programs.

2. Chapters must provide documentation to the Office of Fraternity and Sorority Life of all money donated to a philanthropic cause, from events raising $250.00 or more.

3. It is recommended (but not required) that chapters establish an on campus student organization account through Student Services, Inc. *If chapters use an SSI Account for philanthropic donations, they are given an exemption for #2 in this section since the Office of Fraternity and Sorority Life can request an account detail for fraternities and sororities.

**Social Host Responsibility Policy**

The social component of fraternity and sorority life is highly valued at WCU. Fraternities and sororities should promote an environment that encourages social interaction with the campus community. A chapter’s social program should consist of a variety of activities. Non-alcoholic events/functions should equal or exceed the number of social events that include the use of alcohol. The University expects fraternity and sorority social events to be consistent with the social and risk prevention guidelines provided by their national or inter/national organization, as well as with the WCU rules and regulations and FIPG Guidelines that follow. All policies shall be implemented in a way that promotes the legal and responsible use of alcohol. Further, each chapter is expected to adhere to the laws of the Commonwealth of Pennsylvania, Pennsylvania Liquor Control Board, the Borough of West Chester (and municipalities where chapter events are hosted), and West Chester University as they pertain to the consumption of alcohol and other substances as well as building and fire safety codes.

**Fraternal Information & Programming Group (FIPG) Guidelines**

1. The possession, sale, use or consumption of ALCOHOLIC BEVERAGES, while on chapter premises or during a fraternity event, in any situation sponsored or endorsed by the chapter, or at any event an observer would associate with the fraternity, must be in compliance with any and all applicable laws of the state, province, county, city and institution of higher education, and must comply with either the BYOB or Third Party Vendor Guidelines.

2. No alcoholic beverages may be purchased through or with chapter funds nor may the purchase of same for members or guests be undertaken or coordinated by any member in the name of or on behalf of the chapter. The purchase or use of a bulk quantity or common source(s) of alcoholic beverage, for example, kegs or cases, is prohibited.

3. OPEN PARTIES, meaning those with unrestricted access by non-members of the fraternity, without specific invitation, where alcohol is present, are prohibited.

4. No members, collectively or individually, shall purchase for, serve to, or sell alcoholic beverages to any minor (i.e., those under legal drinking age).

5. The possession, sale or use of any ILLEGAL DRUGS or CONTROLLED SUBSTANCES while on chapter premises or during a fraternity event or at any event that an observer would associate with the fraternity is strictly prohibited.

6. No chapter may co-sponsor an event with an alcohol distributor or tavern (tavern defined as an establishment generating more than half of annual gross sales from alcohol) at which alcohol is given away, sold or otherwise provided to those present. This includes any event held in, at or on the property of a tavern as defined above for purposes of fundraising. However, a chapter may rent or use a room or area in a tavern as defined above for a closed event held within the provisions of this policy, including the use of a Third Party Vendor and guest list. An event at which alcohol is present may be conducted or co-sponsored with a charitable organization if the event is held within the provisions of this policy.
7. No chapter may co-sponsor, co-finance or attend or participate in a function at which alcohol is purchased by any of the host chapters, groups or organizations.
8. All recruitment or rush activities associated with any chapter will be non-alcoholic. No recruitment or rush activities associated with any chapter may be held at or in conjunction with a tavern or alcohol distributor as defined in this policy.
9. No member or pledge, associate/new member or novice shall permit, tolerate, encourage or participate in "drinking games." The definition of drinking games includes but is not limited to the consumption of shots of alcohol, liquor or alcoholic beverages, the practice of consuming shots equating to one’s age, “beer pong,” “century club,” “dares” or any other activity involving the consumption of alcohol which involves duress or encouragement related to the consumption of alcohol.
10. No alcohol shall be present at any pledge/associate member/new member/novice program, activity or ritual of the chapter. This includes but is not limited to activities associated with “bid night,” “big brother–little brother” events or activities, / “big sister-little sister” events or activities, “family” events or activities and initiation.

Third Party Vendor Policies

Should a “Third Party Vendor” be hired to serve alcohol, each chapter will be in compliance with its national or inter/national policies when items listed in this section can be documented. Be sure to check with your national or inter/national organization to make sure this checklist will be in compliance with its policy. Further, each chapter is expected to adhere to the laws of the Commonwealth of Pennsylvania, Pennsylvania Liquor Control Board, the Borough of West Chester (and municipalities where chapter events are hosted), and West Chester University as they pertain to the consumption of alcohol and other substances as well as building and fire safety codes.

THE VENDOR MUST:

1. Be properly licensed by the appropriate local and state authority. This might involve both a liquor license and a temporary license to sell on the premises where the function is to be held.
   a. The vendor must be “RAMP (Responsible Alcohol Management Program) certified.
2. Be properly insured with a minimum of $1,000,000 of general liability insurance, evidenced by a properly completed certificate of insurance prepared by the insurance provider.
   a. The above “certificate of insurance” must also show evidence that the vendor has, as part of his/her coverage, “off premise liquor liability coverage and non-owned and hired auto coverage.”
   b. The certificate of insurance must name as additional insured (at a minimum) the local chapter of the fraternity hiring the vendor as well as the national fraternity with whom the local chapter is affiliated.
3. Agree in writing to cash sales only, collected by the vendor, during the function. (If Third Party Vendor Program Agreement is filled out properly, then requirements #3 and #4 will have been fulfilled.)
4. Agree in writing all the responsibilities that any other purveyor of alcoholic beverages would assume in the normal course of business, including but not limited to:
   a. Checking identification cards upon entry;
   b. Not serving minors;
   c. Not serving individuals whom appear to be intoxicated;
   d. Maintaining absolute control of ALL alcoholic containers present;
e. Collecting all remaining alcohol at the end of a function (no excess alcohol, opened or unopened, is to be given, sold, or furnished to the chapter)
f. Removing alcohol from premises

The Third Party Vendor Guidelines and Agreement will be signed by chapter representatives as well as the vendor. (Appendix 1)

THE ORGANIZATION MUST ENSURE:
1. Themes of the event are in good taste.
2. Entrance and exits of the event are monitored.
3. Invitations and guest lists are used to monitor attendees.
4. Food and non-alcoholic beverages are provided to attendees.
5. Members of the organization are serving as monitors for the event.
6. Attendees must be marked/identified as over/under the legal drinking age.

BYOB Policies

The BYOB policies provided are suggestions for safe and practical implementation. Individual chapters must still follow their own national or inter/national policies, if said policies are more specific and/or more stringent. If questions arise, be advised that this checklist does not supersede the local, city, state, general fraternity/sorority, or national laws, statues and policies – or common sense. Be sure to contact your national or inter/national fraternity to make sure the stipulations are consistent with general fraternity standards.

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1. Themes of the event are in good taste.
2. Entrance and exits of the event are monitored.
3. Invitations and guest lists are used to monitor attendees.
4. Food and non-alcoholic beverages are provided to attendees.
5. Attendees are marked/identified as over/under the legal drinking age.
6. Members of the organization are serving as monitors for the event.
7. Limited quantity of alcohol may be brought by of age guests
8. The service distribution center must be managed by members of the organization
Third Party Vendor Procedures

The Third Party Vendor procedures provided are suggestions for safe and practical implementation. Individual chapters must still follow their own national or inter/national policies, if said policies are more specific and/or more stringent. If questions arise, be advised that this checklist does not supersede the local, city, state, general fraternity/sorority, or national laws, statues and policies – or common sense. These guidelines are designed to help you implement a Third Party Vendor event. Questions you may have regarding the logistics of a Third Party Vendor event are most likely answered throughout this checklist. Be sure to contact your national or inter/national fraternity to make sure the stipulations are consistent with general fraternity standards.

1. Themes must be in good taste
   a. A full description of the theme is required on the Social Event Notification and Planning Form.

2. Entrance and exits must be monitored
   a. One well-lit entrance, controlled and monitored by security or an individual member
   b. Monitors check to see if those seeking entry are members or have an invitation and are on the guest-list
   c. Members and guests are required to show a picture ID. For those consuming alcohol at the event, an ID with a birth date is required.
   d. A guest’s name is checked once entry into the event location has been made.
   e. At least one or more exits must be made available due to fire codes and laws; however, exits cannot be used as entrances

3. Invitations and guest lists are used to monitor attendees.
   a. Invitation guest lists with specific names and birthdays of all non-members who have been invited should be generated for each function
   b. Social events (with alcohol) open to the entire fraternity or sorority community or student population encourage the likelihood of accidents and risky behavior and are prohibited
   c. A copy of the Guest List used during the event will be submitted to the appropriate council officer no later than one week after the event.

4. Food and non-alcoholic beverages must be provided for guests
   a. The amount of non-alcoholic beverages should at least equal the number of underage members and guests at the event
   b. Food, and non-alcoholic and alcoholic beverages should be contained within one centralized location
   c. Non-alcoholic beverages should be served from closed containers (cans, plastic bottles, or fountain dispersing machines)
   d. Non-alcoholic beverages are to be presented in an attractive and accessible manner.
   e. During the last 30 minutes of an event, alcohol service should stop. A new non-alcoholic beverage and a new food item should be served for those who wish to switch beverages and begin winding down

5. Attendees are marked/identified as over/under the legal drinking age.
   This could be done by:
   a. Members and guests receive a non-adjustable wristband that identifies if they are over/under the legal drinking age.
      i. *Governing councils will provide wristbands for up to four events per month per chapter
   b. Underage guests have their hands stamped with large X’s.
6. Members of the organization are serving as monitors for the event.
   a. Monitors are charged with regulating social events and maintaining the risk prevention policy of the chapter(s) involved
   b. One monitor for every 25 guests is advised
   c. If hired security is not used, monitors from every cosponsoring organization must be used to ensure that the rules are applied to all attendees equally
      i. For co-sponsored events, a minimum of four monitors will be provided from each cosponsoring organization
         1. One with a car (for emergency purposes only, not for personal rides home)
         2. One at the entrance
         3. Two roaming the party
   b. If a first year member is serving as a monitor, a non-first year member will be supervising/mentoring.
   d. Specialty clothing may be worn by the monitors to set them apart from the rest of the party-goers
   e. Chapter presidents, risk management chairs, and social chairs should limit their use of alcohol (if consuming at all) during social events so that they can, along with the monitors, ensure that a safe social environment is maintained
      i. The Chapter President must attend or designate a member of the Executive Board to serve as the Crisis Management point-person
   f. Monitors have the right to deny access to the event to anyone they think is already impaired by alcohol or other drugs, even if the person is on the invitation guest list

**BYOB Procedures**

The BYOB procedures provided are suggestions for safe and practical implementation. **Individual chapters must still follow their own national or inter/national policies, if said policies are more specific and/or more stringent.** If questions arise, be advised that this checklist does not supersede the local, city, state, general fraternity/sorority, or national laws, statues and policies – or common sense. These guidelines are designed to help you implement a BYOB event. Questions you may have regarding the logistics of a BYOB event are most likely answered throughout this checklist. Be sure to contact your national or inter/national fraternity to make sure the stipulations are consistent with general fraternity standards.

1. Themes must be in good taste
   a. A full description of the theme is required on the Social Planning Form.
2. Entrance and exits must be monitored
   a. One well-lit entrance, controlled and monitored by security or an individual member
   b. Monitors check to see if those seeking entry are members or have an invitation and are on the guest-list
   c. Members and guests are required to show a picture ID. For those consuming alcohol at the event, an ID with a birth date is required.
   d. A guest’s name is checked once entry into the event location has been made.
   e. At least one or more exits must be made available due to fire codes and laws; however, exits cannot be used as entrances

3. Invitations and guest lists are used to monitor attendees.
a. Invitation guest lists with specific names and birthdays of all non-members who have been invited should be generated for each function.

b. Social events (with alcohol) open to the entire fraternity or sorority community or student population encourage the likelihood of accidents and risky behavior and are prohibited.

c. A copy of the Guest List used during the event will be submitted to the appropriate council officer no later than one week after the event.

4. Food and non-alcoholic beverages must be provided for guests
   a. The amount of non-alcoholic beverages should at least equal the number of underage members and guests at the event.
   b. Food, and non-alcoholic and alcoholic beverages should be contained within one centralized location.
   c. Non-alcoholic beverages should be served from closed containers (cans, plastic bottles, or fountain dispensing machines).
   d. Non-alcoholic beverages are to be presented in an attractive and accessible manner.
   e. During the last 30 minutes of an event, alcohol service should stop. A new non-alcoholic beverage and a new food item should be served for those who wish to switch beverages and begin winding down.

5. Attendees are marked/identified as over/under the legal drinking age. This could be done by:
   a. Members and guests receive a non-adjustable wristband that identifies if they are over/under the legal drinking age.
      i. The wristbands must be distributed to the chapters at a predetermined time of the chapter’s choosing.
      ii. *Governing councils will provide wristbands for up to four events per month per chapter.
      iii. The member who checks in the alcohol of of-age guests writes the type of alcohol on their wristband and amount (BL 1 2 3 4).
   b. Chapters must check alcohol into the Distribution Center at the predetermined time agreed upon by participating chapters.
   c. Individuals checking alcohol into the event receive a hand-stamp on each hand (this is to show that the individual has already entered the event and checked in alcohol).
   d. Of-age guests and members who do not check in alcohol DO NOT receive a stamp or a wristband (only those who bring alcoholic beverages are allowed to consume alcoholic beverages).
   d. Underage guests have their hands stamped with large X’s.

6. Members of the organization are serving as monitors for the event.
   a. Monitors are charged with regulating social events and maintaining the risk prevention policy of the chapter(s) involved.
   b. One monitor for every 25 guests is advised.
   c. If hired security is not used, monitors from every cosponsoring organization must be used to ensure that the rules are applied to all attendees equally.
      i. For co-sponsored events, a minimum of four monitors will be provided from each cosponsoring organization.
         1. One with a car (for emergency purposes only, not for personal rides home).
         2. One at the entrance.
         3. One roaming the party.
         4. One at alcohol distribution center.
d. If a first year member is serving as a monitor, a non-first year member will be supervising/mentoring.

e. Specialty clothing may be worn by the monitors to set them apart from the rest of the party-goers.

f. Chapter presidents, risk management chairs, and social chairs should limit their use of alcohol (if consuming at all) during social events so that they can, along with the monitors, ensure that a safe social environment is maintained.
   i. The Chapter President must attend or designate a member of the Executive Board to serve as the Crisis Management point-person.

g. Monitors have the right to deny access to the event to anyone they think is already impaired by alcohol or other drugs, even if the person is on the invitation guest list.

7. Limited Quantity of alcohol is recommended to be brought by of age guests.
   a. The following stipulations are recommended per person, for a typical four hour function. It is acceptable for multiple people to purchase alcohol together and one person bring this alcohol, which is checked in with all those consuming present. *For example, four people can bring in one case of beer.*
      a. Six (6), twelve (12) ounce cans of beer
      b. Four (4), ten (10) ounce wine coolers
      c. Four (4), six (6) ounce bottles of wine
      d. Four (4), 1.7 ounce bottles of liquor (*please note that many national risk management policies do not permit liquor*)
   b. No kegs
   c. No squeeze bottles, beer bongs, party balls, pitchers, tumblers, or other containers
   d. No alcohol for common use in members’ rooms
   e. No glass bottles (except wine coolers or the equivalent of a wine cooler, which is 4-6% alcohol that are poured into plastic cups before redistribution)
   f. No shots, drinking games, or other activities that encourage inappropriate drinking behavior

8. The service distribution center must be managed by members of the organization.
   a. One centralized location should be established for the distribution of all food, non-alcoholic beverages, and for the distribution of all alcoholic beverages.
   b. No other location, especially members’ rooms, can be used for the distribution of alcoholic beverages.
   This could be done by:
      i. Anyone who wishes to acquire an alcoholic beverage that s/he brought to the event, must present show the wristband and return an empty can if this is not the first request (returning the cans assists the chapter with its recycling efforts and helps ensure that alcohol is not being given to others once it leaves the service center).
      ii. A cooling area for the alcohol brought to the function by members and guests, is as simple as a large rubber trash can filled with ice.
      iii. The service monitors will mark on the wristband each time an alcoholic beverage is served.
      iv. The service monitors must not serve anyone who is intoxicated, even if the person has alcohol remaining.
      v. Only one beverage may be acquired at a time.
      vi. Left-over alcohol can be picked up the following day; otherwise it is to be discarded.
a. For co-sponsored events, the sober monitors for the chapter not hosting the location will take the leftover alcohol to a central location to be picked up the following day.

**Fraternity – Sorority Co-Sponsored Events Policy (Mixers)**

Co-sponsored events (between two or more chapters) will have the following restrictions:

1. Events where alcohol is present must follow the BYOB or Third Party Vendor Guidelines set forth in this document.
   a. Each individual chapter will follow its National Policy which may or may not give permission for a co-sponsored event with alcohol to take place at a non-third party vendor location.
   i. Documentation of this permission must accompany the Social Planning Form paperwork submitted.

**Resolutions regarding specific areas of Risk Management:**

The following are statements on the basic risk prevention issues that are central in fraternity and sorority life. The resolutions include alcohol, illegal drugs, hazing, sexual assault and harassment, fire safety, and weapons. The Resolution from the fraternity and sorority governing councils is then followed by the West Chester University Policy and the FIPG Guideline on the specific issue.

**Alcohol and Illegal Drug Policy**

**Fraternity and Sorority Governing Councils Resolution on Alcohol and Illegal Drugs:**

All member organizations shall follow local, Commonwealth of Pennsylvania and Federal laws, the West Chester University Student Code of Conduct, and FIPG Guidelines pertaining to alcohol and illegal drug use.

**West Chester University Resource Guide – Alcohol and Illegal Drugs:**

http://www.wcupa.edu/_services/stu.lif/ramseyeview/policies/coc_standards.asp

**Policy Statement and Purpose**

West Chester University is a dry campus, so any violation of the University’s alcohol policy, as set forth in the Ram’s Eye View Student Handbook, (www.wcupa.edu/_services/stu.lif/ramseyeview) shall be construed as a violation of this section. Any off-campus violation is a violation of this section when such off-campus use violates local, state, or federal laws. This section shall include, but is not limited to, (a) display of empty alcohol containers in any University facility, residence hall, or any affiliated University housing, (b) sale, exchange, use, possession, or consumption of alcoholic beverages on campus, (c) underage use, possession, or consumption of alcoholic beverages, (d) open containers of alcoholic beverages, (e) public intoxication, and (f) driving under the influence. As it is a violation of this policy to possess alcohol, demonstrating that a student has knowledge of the location of alcohol and/or the intent to exercise control over the alcohol shall constitute possession. In the absence of extraordinary or mitigating circumstances, a sanction of suspension or expulsion may be imposed on any student found responsible of (g) selling and/or furnishing alcohol to minors.
Students who exhibit drug use or abuse or any other violation of the University’s drug policy, as set forth in the Ram’s Eye View Student Handbook (www.wcupa.edu/_services/stu.lif/ramseyview), shall be considered in violation of this section. This includes, but is not limited to, (a) possession or use of any illegal or controlled substance, drug, and/or (b) possession of drug paraphernalia, (c) possession of a significant quantity, distribution, or sale of drugs, and/or (d) driving under the influence. Any off-campus violation is a violation of this section when such off-campus use or possession is in violation of local, state, or federal laws. Demonstrating that a student has knowledge of the location of any illegal or controlled substance, drug or drug paraphernalia, and/or the intent to exercise control over such items shall constitute possession. Use of legal substances (e.g., inhalants) in a fashion designed to alter one’s mental or physical state will be considered reckless behavior as described in the Infliction of Harm section (see I.C.1.c).

**FIPG Guidelines - Alcohol: refer to page 7-8.**

**FIPG Guidelines - Drugs:**
The possession, sale or use of any ILLEGAL DRUGS or CONTROLLED SUBSTANCES while on chapter premises or during a fraternity event, or at any event that an observer would associate with the fraternity, is strictly prohibited.

### Hazing

**Fraternity and Sorority Governing Councils Resolution:**
No chapter, colony, student or alumnus shall conduct nor condone hazing activities, and all will support and follow the West Chester University Anti-Hazing Policy and FIPG Guidelines.

**West Chester University Anti-Hazing Policy:**
http://www.wcupa.edu/_services/stu.greeklife/documents/WCU_AntiHazing_Policy.pdf

Hazing involving West Chester University students or student groups is strictly prohibited. Hazing is defined by the State of Pennsylvania Law (Act 175) as any action or situation that recklessly or intentionally endangers the mental or physical health or safety of a student for the purpose of initiation or admission into or affiliation with any organization operating under the sanction of an institution of higher education. The term shall include, but not be limited to, any brutality of a physical nature, such as whipping, beating, branding, forced calisthenics, exposure to the elements, forced consumption of any food, liquor, drug or other substance, or any other forced physical activity that could adversely affect the physical health and safety of the individual and shall include any activity that would subject the individual to extreme mental stress, such as sleep deprivation, forced exclusion from social contact, forced conduct that could result in extreme embarrassment, or any other forced activity that could adversely affect the mental health or dignity of the individual. For purposes of this definition, any activity as described in this definition that the initiation or admission into or affiliation with an organization is directly or indirectly conditioned shall be presumed to be “forced” activity, the willingness of an individual to participate in such activity notwithstanding. In addition, the following specific actions and activities are strictly prohibited and include but are not limited to:

**Physical Hazing:**
1. Causing excessive physical fatigue through physical and psychological shocks;
2. Forcing, requiring, or endorsing calisthenics, such as sit-ups, push-ups, and runs;
3. Conducting a new member-related activity between the hours of midnight and 7 a.m. or awakening individuals during these hours;
4. Forcing, requiring, or endorsing less than seven continuous hours of sleep for associates/new members each night;
5. Pushing, shoving, tackling, paddle swats, or any other act that may cause harm;
6. Forcing, requiring, or endorsing new members/associate members to drink alcohol, take any illegal drugs, or eat any food or other substance;
7. Dropping food (e.g., eggs, grapes, liver, etc.) into mouths;
8. Forcing, requiring, or endorsing branding, scarring, or tattooing;
9. Throwing anything (whipped cream, garbage, water, paint, etc.) at or on an individual;
10. Forcing, requiring, or endorsing theft of any personal property under any circumstances;
11. Assigning or endorsing “pranks” or harassing another organization;
12. Forcing, requiring, or endorsing the defacing of trees, ground, or buildings on or off campus;
13. Conducting unauthorized quests, treasure hunts, scavenger hunts, paddle hunts, big sister/brother or little sister/brother hunts;
14. Forcing, requiring, or endorsing the carrying of items that will interfere with daily activities;

**Mental Hazing:**
15. Conducting activities that do not allow adequate time for study during the new member period;
16. Yelling and screaming or directing negative comments at associates/new members;
17. Deceiving new members prior to the ritual designed to convince an associate/new member that he/she will not be initiated or will be hurt;
18. Forcing, requiring, or endorsing the playing of extremely loud music or music repeated over and over, or any other audible harassment;
19. Not permitting new members/associate members to talk for periods of time;
20. Forcing, requiring, or encouraging nudity at any time;
21. Messing up the house or a room for the associate members/new members to clean;
22. Forcing, requiring, or endorsing the running of unreasonable personal errands (servitude);
23. Forcing, requiring, or endorsing engagement in unauthorized activity that involves compelling an individual or group to remain at a certain place or transporting anyone anywhere, within or outside the Borough of West Chester (drop offs, kidnaps, etc.);
24. Forcing, requiring, or endorsing engagement in public stunts and shenanigans;
25. Forcing, requiring, or endorsing shaving of head or body hair;
26. Forcing, requiring or encouraging new members/associate members to act like animals or other objects;
27. Wearing public apparel that is conspicuous and not “normally” in good taste.

In addition to the above stipulations, West Chester University's Anti-Hazing Policy also includes the following regulations:
1. Individuals and/or student organizations that force, require, and/or endorse violations will be held directly responsible through the University's judicial process and if appropriate, through local authorities, which may pursue criminal action.
2. The negligence or consent of a student or any assumption of risk by the student is not a defense to an action brought pursuant to this policy.
3. Any student organization wishing to proceed with a membership intake process must first get approval from the Director of Fraternity and Sorority Life and/or the Director of Student Leadership and Involvement.
4. No intake activities are permitted during official holiday or break days, including but not limited to fall break, Thanksgiving break, winter break and spring break.
5. New Member programs must not interfere with the rights and activities of others and should always reflect the best interests of the members of the organization it represents and the University community as a whole.
6. In all cases of alleged violations of this policy, faculty and alumni advisors and the national/international headquarters of any organization will be notified.
7. Members of student organizations having new member periods and new members/associates must file Anti-Hazing Compliance Forms with the Assistant Director of Student Involvement or designee (located in 238 Sykes Union) within three days of the start of the new member program. Organizations recognized under the Office of Fraternity & Sorority Life must submit paperwork in accordance with communications from the office staff.
8. All BLGC, IFC and Panhellenic recognized student organizations must complete their new member programs within seven weeks or less in any given semester. All other student groups must complete their programs within a maximum of eight weeks from start to initiation.
9. New Member programs and initiations must end, at a minimum, fourteen days prior to the start of final examinations. Copies of the comprehensive Anti-Hazing Compliance Forms are available in the Office of Student Leadership & Involvement, 238 Sykes Union. Specific questions regarding the Anti-Hazing Policy may be directed to the Assistant Director of Student Involvement and Fraternity and Sorority Life or the Director of Fraternity and Sorority Life.
10. Organizations wishing for an exemption, on any portion of the Anti-Hazing Policy as it reads, should schedule a meeting with the Director of Student Leadership & Involvement or designee to discuss the policy issues that are of concern and the rationale for exemption. In the event the issues are not resolved at this stage, the student group may formally apply for an exemption through the Office of the Assistant Dean of Student Involvement.

FIPG Guidelines - Hazing:
Fraternity and Sorority Councils Risk Prevention Policies and Procedures

No chapter, colony, student or alumnus shall conduct nor condone hazing activities. Hazing activities are defined as: "Any action taken or situation created, intentionally, whether on or off fraternity premises, to produce mental or physical discomfort, embarrassment, harassment, or ridicule. Such activities may include but are not limited to the following: use of alcohol; paddling in any form; creation of excessive fatigue; physical and psychological shocks; quests, treasure hunts, scavenger hunts, road trips or any other such activities carried on outside or inside of the confines of the chapter house; wearing of public apparel which is conspicuous and not normally in good taste; engaging in public stunts and buffoonery; morally degrading or humiliating games and activities; and any other activities which are not consistent with academic achievement, fraternal law, ritual or policy or the regulations and policies of the educational institution or applicable state law."

Sexual Abuse and Harassment

Fraternity and Sorority Governing Councils Resolution:
No chapter will tolerate or condone any form of sexually abusive behavior on the part of its members, whether physical, mental, or emotional. This is to include any actions which are demeaning to women or men including but not limited to date rape, gang rape, or verbal harassment.

West Chester University Sexual Misconduct Policy:
West Chester University is committed to creating and maintaining a campus environment where safety, health, and well-being are priorities for all. Sexual misconduct includes a variety of acts that are perpetrated against another without consent or when an individual is unable to freely give consent. Accordingly, the University will not tolerate any form of sexual misconduct, including sexual assault, harassment, exploitation, and stalking. All forms of sexual misconduct are serious offenses with serious consequences. In addition to violating the WCU Student Code of Conduct, some forms of sexual misconduct are both criminal and civil offenses that are punishable by law. Students found guilty of sexual misconduct may face disciplinary actions up to and including expulsion.

DEFINITIONS OF SEXUAL MISCONDUCT
The Sexual Misconduct Policy at West Chester University covers a variety of acts that are perpetrated against another without consent or when an individual is unable to give consent freely. Anyone can be a victim regardless of their gender or sexual orientation. Sexual misconduct includes, but is not limited to the following prohibited behaviors:

1. Sexual Harassment
2. Sexual Assault
3. Sexual Exploitation
4. Stalking
5. Dating Violence
6. Domestic Violence

Please refer to the full policy document found here: www.wcupa.edu/sexualmisconduct

FIPG Guidelines – Sexual Abuse and Harassment:
Fraternities and sororities will not tolerate or condone any form of sexist or sexually abusive behavior on the part of its members, whether physical, mental or emotional. This is to include any actions which are demeaning to women and men, including but not limited to, date rape, gang rape or verbal harassment.
**Fire Safety**

**FIPG Guidelines – Fire, Health and Safety:**
1. All houses should meet all local fire and health codes and standards.
2. All chapters should post emergency numbers for fire, police and ambulance and should have evacuation routes from houses, common areas and sleeping rooms posted in said areas and on the back door of each sleeping room.
3. All chapters should comply with engineering recommendations as reported by the insurance company.
4. The possession and/or use of firearms or explosive devices of any kind within the confines and premises of the house are expressly forbidden.
5. Events in houses should limit the number of people in basement rooms to consider fire safety occupancy.
   a. Chapters that choose to host events with alcohol will provide documentation that the location has passed inspection and is up to date on all fire codes. This documentation should include a confirmation of the occupancy requirement for the spaces desired to host events.

**Campus and Personal Safety**

**Fraternity and Sorority Governing Councils Resolution on Campus Safety:**
Each chapter is to encourage their members to practice good habits of personal and campus safety, and take advantage of the safety services provided by the WCU Public Safety and the surrounding West Chester and West Goshen Police Departments.

**Substance-Free Events**

**Fraternity and Sorority Governing Councils Resolution:**
1. All fraternities and sororities are required to host one (1) substance-free social event per semester during the school year.
2. All alcohol-free events must be reported on the Chapter Excellence Assessment Program (administered by the Office of Fraternity and Sorority Life)
APPENDIX 1: Third Party Vendor Checklist

Should a “Third Party Vendor” be hired to serve alcohol, each chapter will be in compliance with its national or inter/national policies when items listed in this section can be documented. Be sure to check with your national or inter/national organization to make sure this checklist will be in compliance with its policy. Further, each chapter is expected to adhere to the laws of the Commonwealth of Pennsylvania, Pennsylvania Liquor Control Board, the Borough of West Chester (and municipalities where chapter events are hosted), and West Chester University as they pertain to the consumption of alcohol and other substances as well as building and fire safety codes.

THE VENDOR MUST:

_____ 1. Be properly licensed by the appropriate local and state authority. This might involve both a liquor license and a temporary license to sell on the premises where the function is to be held.

   a. The vendor must be “RAMP (Responsible Alcohol Management Program) certified.

ATTACH COPIES OF STATE AND LOCAL LICENSES TO THIS CHECKLIST.

_____ 2. Be properly insured with a minimum of $1,000,000 of general liability insurance, evidenced by a properly completed certificate of insurance prepared by the insurance provider.

   The above “certificate of insurance” must also show evidence that the vendor has, as part of his/her coverage, “off premise liquor liability coverage and non-owned and hired auto coverage.”

   The certificate of insurance must name as additional insured (at a minimum) the local chapter of the fraternity hiring the vendor as well as the national fraternity with whom the local chapter is affiliated.

ATTACH A COPY OF THE CERTIFICATE OF INSURANCE AND HIGHLIGHT REQUIRED CLAUSES

_____ 3. Agree in writing to cash sales only, collected by the vendor, during the function. (If Third Party Vendor Program Agreement is filled out properly, then requirements #3 and #4 will have been fulfilled.)

_____ 4. Agree in writing all the responsibilities that any other purveyor of alcoholic beverages would assume in the normal course of business, including but not limited to:

   A. Checking identification cards upon entry;
   B. Not serving minors;
   C. Not serving individuals whom appear to be intoxicated;
   D. Maintaining absolute control of ALL alcoholic containers present;
   E. Collecting all remaining alcohol at the end of a function (no excess alcohol, opened or unopened, is to be given, sold, or furnished to the chapter)
   F. Removing alcohol from premises

ATTACH A WRITTEN AGREEMENT SIGNED AND DATED BY THE CHAPTER PRESIDENT AND THE VENDOR STIPULATING AGREEMENT TO THE ITEMS REQUIRED IN #3 AND #4 ABOVE.
This checklist must also be signed and dated by both the chapter president and the vendor. In doing so, both parties understand that only through compliance with these stipulations will the chapter be in compliance with their risk prevention policy.

__________________________  _________________________
Chapter President’s Signature and Date  Vendor’s Signature and Date

APPENDIX 2: Third Party Vendor Agreement

(Name of Vendor ) ________________________________ will be operating as a “Third Party Vendor” to serve alcohol at a social function on ___________________________ (Date) at ___________________________ (Location). Both the vendor and the chapter or chapters involved agree to the salary of $______________ to be paid in full prior to the social function in question. This salary is designed to cover the costs involved with the hiring of ___________ security persons and ________ _________ bartenders and permit costs totaling $______________. It is agreed that__________ ________________ is responsible for managing access to the event. There will be no collecting money at the door. The aforementioned vendor agrees to cash sales only that will be collected by the vendor’s employees only, during the function. The predetermined amount of beverages will be $______________ _____ well drinks, to be served in _______________ oz. cups, and $ ________________ drafts, to be served in _________oz. cups. The aforementioned vendor also agrees to comply with the following risk prevention guidelines for Third Party Vendors:

- check identification upon entry
- to serve alcohol only to persons of legal drinking age
- not to serve individuals who appear to be intoxicated
- to maintain absolute control of all alcoholic containers present
- to collect all remaining alcohol at the end of the function
- and to remove all alcohol from the premises

This form must be signed and dated by both the authorized chapter representative(s) and the authorized vendor representative. In doing so, all parties involved understand that only through compliance with these stipulations, and the additional requirements and rules of the Risk Prevention Guidelines, will the chapter(s) be in compliance with risk prevention requirements.

__________________________
Chapter President’s Signature and Date

__________________________
Chapter Risk Management’s Signature and Date

__________________________
Chapter Social Chair’s Signature and Date

__________________________
Authorized Vendor Representative’s Signature and Date
APPENDIX 3: BYOB Pre-Event Checklist*

The following Pre Event Checklist is designed so that you can quickly determine whether or not you have implemented risk-reducing steps for your chapter’s social event. This page may be copied and used for each of your social events throughout the academic year. Be sure to keep working until you are able to make a yes for each question.

Yes  No  Our event is theme oriented, complete with activities that do not directly relate to alcohol consumption, drinking games, or alcohol abuse.

Yes  No  We are providing plenty of juice, soda, water and other inviting, alcohol-free beverages throughout the duration of the event.

Yes  No  We have plenty of substantial food items for the duration of the event.

Yes  No  We are limiting the types and amounts of alcohol to what is permitted by these policies or by our inter/national organization’s policy (whichever is more strict).

Yes  No  We have one entrance to the event...with one or more exits available if an emergency were to occur.

Yes  No  We have an guest list that has names and birthdays of all members and guests who were issued an invitation (name specific) prior to this event.

Yes  No  We are administering wristbands to all of-age (21 year old) members and guests who have checked in alcohol for this function.

Yes  No  We have a co-ed team composed of members who are of-age and initiated, non-drinking, and sober, from each sponsoring organization serving as monitors and workers for this event.

Yes  No  For each person who has checked alcohol into the function, we have recorded the type and amount on the guest list and the service monitor will check off on the wristband each time the individual consumes an alcoholic beverage.

Yes  No  At the door, all alcohol is checked in and then taken by a designated monitor to a holding tank where it will be distributed later via the system we have worked out in advance.

Yes  No  We have just one central location for all food, snacks, non-alcoholic drinks, and alcoholic beverages that members and guests have brought for the evening.

Yes  No  Alcohol not brought in cans is poured into cups before being distributed. If drinking from a can, additional drinks are given only in exchange for empty cans thereby assisting with our clean-up and recycling efforts.

Yes  No  No alcohol leaves the social event once it has been checked into the event. We have determined a system for the alcohol to return to its owner the following day.

Yes  No  We have discussed the event with both our national or inter/national fraternity and chapter advisor.

*If a co-sponsored event, representatives from both chapters need to sign this form.*
By signing below, all parties involved understand that only through compliance with these stipulations, and the additional requirements and rules of the Risk Prevention Guidelines, the chapter(s) will be in compliance with risk prevention requirements.

__________________________________________________________
Chapter President’s Signature and Date

__________________________________________________________
Chapter Risk Management’s Signature and Date

__________________________________________________________
Chapter Social Chair’s Signature and Date

__________________________________________________________
Authorized Governing Council Vice President Signature and Date

Approved as of September 28, 2016