UCLA GREEK SYSTEM AUDIT

AUDIT REPORT #23-2204

Audit & Advisory Services

March 2024

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# Background

In accordance with the Campus fiscal year 2023-24 audit plan, Audit & Advisory Services (A&AS) conducted an audit of the UCLA Greek System.

The UCLA fraternity and sorority community includes approximately 3,500 student members across 60 Greek organizations, which represent 13% of the undergraduate student population. The majority of fraternities and sororities have an inter/national headquarters organization that oversees and supports the Campus-based chapters. Six governing councils also provide a governance structure for the fraternity and sorority chapters.

UCLA’s fraternities and sororities are independent organizations, with coordination and guidance provided by staff in the Office of Fraternity & Sorority Life (OFSL). Specifically, OFSL staff provide support to governing council and chapter leadership, including with training, monitoring completion of chapter recognition and paperwork requirements, and leading chapter advisor quarterly meetings, among other areas. OFSL advises within a portfolio model approach. Each OFSL staff member directly supports each one of the councils while advising chapters across the six different councils. The Director of OFSL provides oversight of OFSL operations and is supported by two OFSL staff members.

# Purpose and Scope

The purpose of the review was to evaluate the adequacy and efficiency of internal controls surrounding the Greek system. Where applicable, compliance with University policies and procedures was also evaluated. The scope of the audit covered the following areas:

Policies and Procedures

Education and Training

Monitoring and Reporting

The review was conducted in conformance with the *International Standards for the Professional Practice of Internal Auditing* and included interviews, tests, and other procedures considered necessary to achieve the objective.

# Summary Opinion

Based on the results of the work performed within the scope of the audit, OFSL has established internal controls and business practices to help ensure that the objectives of the department are met. However, the review did find areas where controls and practices could be further strengthened within OFSL and across the University.

*Hazing Prevention*

* The University should establish a senior leader-endorsed mandate for Campus-wide hazing prevention to be carried out by a committee of representative Campus stakeholders (e.g., OFSL, Athletics, Dean of Students Office, Student Organizations, Leadership and Engagement (SOLE), Recreation, New Student Orientation, Residential Life). This ongoing committee should be charged with developing and meeting goals to enhance Campus-wide hazing prevention, in accordance with best practices and potential upcoming legislation related to hazing (e.g., Report and Education About Campus Hazing (REACH) Act).

*Expectations of Recognition*

* OFSL should continue to work with Greek chapters to ensure that all members complete Title IX and other applicable trainings within required timeframes and reinforce the importance of maintaining compliance with training requirements (through make-up training sessions, e-mail reminders, chapter president/advisor meetings, etc.).
* OFSL should continue to investigate the feasibility of developing a Risk Management Policy template for local chapters without a national policy.
* OFSL should continue monitoring efforts to ensure that required steps and paperwork are properly completed, in accordance with OFSL Recognition and New Member Recruitment/Intake requirements. This effort could include developing automated e-mail reminders for chapter members that have pending MyUCLA invitations.

*Alcohol and Other Drug (AOD) Prevention*

* The University should consider the feasibility of establishing AOD prevention training and education to Greek organizations and other student group organizations. Enhanced guidance, under the direction of Student Affairs, could be provided through a UCLA Alcohol website (e.g. either leverage existing website or create a new domain name), which would apply universally to all UCLA student groups.

*Greek Organization Insurance Requirements*

* OFSL should consider working with appropriate Campus stakeholders (e.g. UCLA Insurance Risk Management) to begin to develop formal written policies and procedures or guidelines related to the certificate of insurance process for Greek organizations. This could include establishing minimum insurance policy limits for Greek organizations (for those with inter/national headquarters), requiring policies to name the University of California as an additional insured, establishing guidance/protocols for local chapters that may not have insurance, and developing a tracking mechanism to monitor policy expirations.

*Assembly Bill 524 Reporting Requirements*

* To ensure alignment with AB 524 reporting requirements, OFSL should continue to work with UCLA Student Affairs Information Technology (SAIT) to enhance the Community Report to include the average grade point average (GPA) for new members of Campus-recognized sororities and fraternities.

Monitoring and Reporting

* A&AS supports Office of Student Conduct (OSC) efforts to improve the timeliness of case investigations, including continuing to prioritize cases, establishing realistic timelines, and monitoring progress.

Clery Act Training

* OFSL should work with the UCLA Clery Compliance Officer to determine whether all OFSL staff members should be deemed a Campus Security Authority (CSA) under the University of California – Clery Act Policy, which would require relevant staff to complete Clery Act trainings.

Audit Results and Recommendations:

| # | OBSERVATION and  CRITERIA, where applicable | RECOMMENDATION | MANAGEMENT’S RESPONSE |
| --- | --- | --- | --- |
| HAZING PREVENTION | | | | |
| The UCLA Student Code of Conduct (102.12) and Student Group Code of Conduct (Section 202.12) prohibit hazing, which is defined as “participating in, engaging in, or supporting hazing or any method of initiation or pre-initiation into a Student Group or other activity engaged in on behalf of the organization, by the organization or members of the organization at any time that causes, or can reasonably cause, physical injury or personal degradation or disgrace resulting in psychological harm.” Greek Chapters are responsible for communicating the University Hazing Policy to all members and ensuring that the program does not involve activities defined as hazing.  Audit work included the following:   * Discussions with OFSL, Student Affairs, Athletics, Office of Student Conduct, and Student Organizations, Leadership and Engagement (SOLE), to gain an understanding of hazing prevention measures, resources, education, and training. * Reviewed the UCLA Student Group Conduct Code and Campus hazing information and resources located in OFSL and other UCLA websites (e.g., SOLE, Dean of Students). * Reviewed hazing prevention best practices and resources developed by the StopHazing organization.   The following observation was noted below. | | | | |
|  | Hazing Prevention Program  The University should enhance Campus-wide hazing awareness and prevention efforts.  Based on A&AS’s review, the following was identified:   * The University does not have a centralized Campus-wide program or website to provide a comprehensive and consistent hazing prevention framework for all student groups. Currently, the approach for hazing prevention varies by Campus department and guidance/resources related to hazing are located in various UCLA department websites (e.g., OFSL, SOLE). * Hazing is broadly defined and listed as a prohibited behavior in the UCLA Student Group Code of Conduct. Campus-wide guidance could help educate community members on prohibited activities.      * The University does not provide Campus-wide hazing prevention training to all students. OFSL indicated that there is an ongoing project to develop an Anti-hazing workshop for Greek Chapter leadership members, but there have been delays due to resource constraints and on-boarding/training of new team members. OFSL indicated that they are targeting to offer the workshop during the 2023-24 academic year. | The University should establish a senior leader-endorsed mandate for Campus-wide hazing prevention to be carried out by a committee of representative Campus stakeholders (e.g., OFSL, Athletics, Dean of Students Office, SOLE, Recreation, New Student Orientation, Residential Life). This ongoing committee should be charged with developing and meeting goals to enhance Campus-wide hazing prevention in accordance with best practices and potential upcoming legislation related to hazing (e.g., Report and Education About Campus Hazing (REACH) Act).  Potential enhancement areas to consider include:   * Re-evaluate the definition of hazing based on best practices and guidance/requirements from potential upcoming hazing legislation (e.g., REACH Act). * Develop enhanced hazing awareness and prevention guidance, including clear examples of prohibited activities. * Provide comprehensive research-based hazing prevention training and education for students, staff, faculty, and other appropriate Campus stakeholders. * Develop a Campus-wide hazing website to disseminate hazing awareness/prevention information and resources to all Campus stakeholders. | Response: A hazing prevention committee is being developed by the Cultural and Recreational Affairs Chief Risk Officer with identified Campus leadership. This committee will also work to develop Campus wide hazing prevention trainings to the appropriate constituents.    Point Person: Cultural and Recreational Affairs Chief Risk Officer, Interim Dean of Students, and OFSL Director  Timeline: Group identification by Spring 2024 with meetings commencing during that time frame. Development of hazing prevention programs during the 2024-2025 academic year for subsequent implementation.  Response: The OSC will work with UCOP and Legal Counsel to update both the student conduct code and student group conduct code on the definition of hazing.  Point Person: Interim Dean of Students  Timeline: The target timeline is during the 2024-2025 academic year.  Response: As of Fall 2023, UCOP created the UC Principles of Community-Hazing Prevention to assess and determine hazing prevention needs across all ten campuses.  Timeline: Ongoing  Response: Student Affairs websites are going through a rebranding and the hazing prevention committee will work with Student Affairs IT to develop a central website to disseminate information and resources. The goal is there will be a standalone site that will also have pop-outs with Campus constituents such as OSC, Dean of Students (DOS), SOLE, OFSL, Res Life, Recreation, etc.  Point Person: Cultural and Recreational Affairs Chief Risk Officer /Associate Vice Chancellor, Campus Life/Student Affairs IT  Timeline: Fall 2024 for the initial draft and built out from there. |
| EXPECTIONS OF RECOGNITION | | | | |
| The University recognizes and affiliates itself with fraternities and sororities through OFSL. OFSL developed an Expectations of Recognition document that communicates and outlines minimum standards for all social fraternities and sororities at UCLA. These minimum standards are monitored, reviewed, and reaffirmed by OFSL to ensure that required steps and paperwork are properly completed by each chapter.  OFSL provides each chapter quarterly status letters that show the status of the chapter’s expectations of recognition of requirements, including what items have been completed and/or missing items. When all expectations are upheld, the organization is deemed fully recognized and in good standing with the University. When a chapter fails to meet the expectations, it is subject to a restriction of chapter/Campus privileges and/or disciplinary actions, ranging from educational sanctions to a suspension of recognition.  Audit work included the following:   * Discussions with OFSL to gain an understanding of procedures and key requirements for Greek organizations to be fully recognized and in good standing with the University. * Reviewed OFSL policies and procedures, including Expectations of Recognition and Recruitment and Intake Procedures. * Reviewed Title IX training attendance records and documentation (FY 2022-23) maintained by OFSL for chapter president/council meetings and workshops. * Sample testing of six Greek organizations (FY 2022-23) to ensure that required steps and paperwork were completed in accordance with OFSL Expectation of Recognition requirements.   The following observations are noted below: | | | | |
|  | Title IX Training  Greek chapter members do not always complete required Title IX training, in accordance with OFSL’s Expectations of Recognition.  Of the six Greek chapters reviewed, three chapters had members that did not complete Title IX training (Alpha Phi Alpha – one member, Kappa Psi Epsilon – one member, Theta Kappa Phi – three members) during the 2022-23 academic year and are facing chapter sanctions.  Furthermore, based on OFSL’s analysis, there were a total of 34 chapter members (less than 1%) from all Greek organizations that did not complete training and are facing chapter sanctions.  \_\_\_\_\_\_\_\_\_\_\_\_\_  Criteria:  OFSL Fraternity and Sorority Expectations of Recognition require each chapter to “be in compliance with the University of California’s Office of the President (UCOP) Title IX training and education requirements by the announced fall quarter deadline. Chapters not in compliance will face event restrictions.” | OFSL should continue to work with Greek chapters to ensure that all members complete Title IX and other applicable trainings within required timeframes, and reinforce the importance of maintaining compliance with training requirements (through make-up training sessions, e-mail reminders, chapter president/advisor meetings, etc.). | Response: OFSL will continue to track chapters’ completion rates for Title IX trainings and communicate with members and chapters as to their progress. OFSL will work with the Title IX office to identify updates in protocols for make-up sessions and requirements for students who do not complete the training. OFSL will better document completion and restrictions for chapters who do not reach 100%.  Point Person: OFSL Director  Timeframe: Spring 2024 for rest of the changes with the Title IX Office with a Fall 2024 implementation. |
|  | Risk Management Policy  Of the six chapters tested, two chapters (Phi Lambda Rho and Theta Kappa Phi) did not submit a copy of their Risk Management Policy to OFSL, which is a requirement under OFSL’s Expectations of Recognition. OFSL was aware of this deficiency and indicated that the two chapters were local chapters that did not have a formal risk management policy (typically, chapters with inter/national headquarter organizations have this in place).  To resolve this issue, OFSL indicated that they are working on developing a Risk Management policy template for local chapters without a national policy.  \_\_\_\_\_\_\_\_\_\_\_\_\_\_  Criteria:  OFSL’s Expectations of Recognition requires Greek chapters to “place a copy of their inter/national and/or chapter Risk Management Policy on file with the Office of Fraternity and Sorority Life before the first social function of the academic year.” | OFSL should continue to investigate the feasibility of developing a Risk Management Policy template for local chapters without a national policy. | Response: OFSL is already working with Campus Life’s Risk Management team and UCLA Insurance & Risk Management (IRM) to develop a template risk management plan to provide to local and regional chapters who do not have an inter/national policy.  Point Person: OFSL Coordinator/Cultural and Recreational Affairs Chief Risk Officer  Timeline: Completed template by Summer 2024 for implementation for 2024-2025 academic year. |
|  | New Member Recruitment and Intake Paperwork  Greek chapters do not always complete required steps and paperwork, in accordance with OFSL Recruitment and Intake Procedures for all Chapters.  Based on review of chapter documents maintained for six Greek organizations, the following was identified:   * Five chapters had chapter members with pending MyUCLA invitations, which could impact the accuracy/completeness of Academic Grade and Performance Reports published in the OFSL website for each Greek Organization. * One chapter (Alpha Phi Alpha) did not complete and submit all required paperwork for their new member education/intake program, in accordance with OFSL procedures. Specifically, the chapter did not submit a copy of their inter/national and/or chapter New Member/Aspirant education program, calendar/outline of events, and New Member Educator/Intake Coordinator Checklist.   It should be noted that OFSL was aware of the omissions and the missing items were reflected in the quarterly status reports provided to Chapter leadership.  \_\_\_\_\_\_\_\_\_\_\_\_\_  Criteria:  OFSL Recruitment and Intake Procedures require all Chapters to submit the New Member/Aspirant Education form at least a week prior to the recruitment/intake period beginning, including chapter specific documents such as (1) copy of the inter/national and/or chapter New Member/Aspirant Education program or member intake process; (2) calendar/outline detailing the specific events included in the program/process; and (3) completed New Member Educator/Intake Coordinator Checklist. New Members/Aspirants must also accept their invitation to join the MyUCLA chapter portal within 7 days from the date of invitation. Chapter officers are responsible to update their roster to show these members as “new members.” | OFSL should continue monitoring efforts to ensure that required steps and paperwork are properly completed in accordance with OFSL Recognition and New Member Recruitment/Intake requirements. This could include developing automated e-mail reminders for chapter members that have pending MyUCLA invitations. | Response: OFSL will continue to track chapters’ completion of all related documentation. OFSL will evaluate tracking procedures and identify new ways to receive and document required materials. OFSL is currently in process with Student Affairs IT to create reminder e-mails for MyUCLA invitations.  Point person: OFSL Director/OFSL Coordinator  Timeline: Completion date Spring 2024 for implementation 2024-2025. |
| ALCOHOL AND OTHER DRUGS (AOD) EDUCATION AND PREVENTION | | | | |
| In accordance with the UCLA Student Group Code of Conduct, student groups that serve or allow possession of alcoholic beverages and/or controlled substances at their functions or group sponsored events, on or off Campus, may be disciplined if they commit violations of alcoholic beverage laws, the UCLA Student Alcohol Policy, and other University regulations. The University requires all first-year and transfer students to complete an online alcohol education and prevention program (AlcoholEdu for College). Greek organizations must also adhere to their chapter’s local, inter/national, and/or governing council policies and procedures related to hosting social events with alcohol.  Audit work included the following:   * Discussions with OFSL, Student Affairs, and Athletics to gain an understanding of training, resources, and safety practices related to AOD education and prevention. * Reviewed the UCLA Student Alcohol Policy and UCLA Interfraternity Council Risk Management Policy related to AOD and social events.   The following observations are noted below: | | | | |
|  | Alcohol and Other Drugs (AOD) Prevention Education  The University does not have a dedicated Campus unit or specialist to help provide specialized (on-going) AOD prevention education to Greek organizations and other student groups. Currently, student groups would have to go outside the University to find external entities who provide specialized training around alcohol, fentanyl and other drugs. Student organizations would have to pay for this training due to funding/resource issues with the University. | The University should consider the feasibility of establishing AOD prevention training and education to Greek organizations and other student group organizations.  Enhanced guidance, under the direction of Student Affairs, could be provided through a UCLA Alcohol website (e.g. either leverage existing website or create a new domain name), which would apply universally to all UCLA student groups. | Response: UCLA is reconstituting Campus committees to address AOD on Campus through education, policy, and protocol updates. OFSL will work with these committees, including the Drug Free Schools Committee and the Substance Abuse Partnership Committee, to develop and create a new focus on education and practices within the community. OFSL will work to coordinate these outreach efforts for chapter and council presidents' meetings and other community trainings.  Point person: OFSL Coordinator  Timeline: Begin outreach by Spring 2024, Summer 2024 identify opportunities and implement for 2024-2025. |
| GREEK ORGANIZATION INSURANCE REQUIREMENTS | | | | |
| Audit work included the following:   * Discussions with OFSL and UCLA Recreation regarding processes and procedures for ensuring that proper insurance is maintained for on-Campus events held by Greek organizations. * Reviewed UCLA Recreation written procedures and guidelines for on-Campus event insurance requirements. * Sample testing for five Greek chapter events (FY 2022-23) hosted on-Campus through UCLA Recreation to ensure that proper insurance coverage was maintained for the event.   The following observation was identified: | | | | |
|  | Certificates of Insurance  Prior to Fall 2023, OFSL did not monitor and obtain certificates of insurance (COI) from Greek Chapters to ensure that chapters have appropriate levels of liability insurance coverage to protect against potential lawsuits from chapter activities.  Management indicated that, starting in Fall 2023, Greek organizations will be required to submit their certificates of insurance to OFSL as part of the requirements for Expectations of Recognition. | OFSL should consider working with appropriate Campus stakeholders (e.g. UCLA Insurance Risk Management) to begin to develop formal written policies and procedures or guidelines related to the certificate of insurance process for Greek organizations. This could include establishing minimum insurance policy limits for Greek organizations (for those with inter/national headquarters), requiring policies to name the University of California as an additional insured, establishing guidance/protocols for local chapters that may not have insurance, and developing a tracking mechanism to monitor policy expirations. | Response: OFSL began requiring COI documents during the 2023-2024 academic year from chapters who are insured inter/nationally. OFSL will work with IRM/Legal Counsel to identify the required language to require chapter’s headquarters to include UCLA as an additionally insured party. OFSL will also work on communication strategy with headquarters colleagues.  Point Person: OFSL Coordinator /OFSL Director  Timeline: Summer 2024 for 2024-2025 implementation is the ideal timeline with a 2025-2026 secondary option for headquarters to be aligned with the requirement as it may take more time for their insurance policies to be adapted.  Response: In prior years, OFSL has worked  with CampusConnexions (UCLA’s group  insurance broker) to identify coverage for  chapters who do not have insurance  coverage from an inter/national  headquarters. OFSL will create a more in-  depth step-by-step how-to document to that will be made available on the website.  Point Person: OFSL Coordinator Timeline: Summer 2024  Response: OFSL currently utilizes an Excel  document to track that insurance is  received, but each chapter’s insurance  starts on a different timeline. OFSL will develop a way to update the tracking  mechanism to identify expiration dates.  Point Person: OFSL Coordinator  Timeline: Summer 2024 |
| ASSEMBLY BILL (AB) 524 REPORTING REQUIREMENT | | | | |
| As part of the AB 524 (2022) Campus-Recognized Sorority and Fraternity Transparency Act approved in September 2022, Campus-recognized sororities and fraternities are required to self-report to their institution specified information concerning the sorority or fraternity members and their conduct (e.g., number of active/new members, average grade point average, community service hours, total amount of money fundraised). The bill required each institution to compile and maintain the collected information in a publicly accessible report on the Greek Life internet homepage (or its equivalent) by October 1, 2023.  Audit work included the following:   * Discussions with OFSL regarding the process for collecting and compiling required AB 524 information from Greek chapters. * Reviewed the 2022-23 UCLA Fraternity and Sorority Community Report compiled by OFSL to ensure that required information was included in accordance with AB 524.   The following observation was noted: | | | | |
|  | Fraternity & Sorority Transparency Act (FSTA) Reporting Requirement - Average GPA for New Members  OFSL worked with UCLA Greek chapters to collect and compile specified information required under AB 524 into the 2022-23 UCLA Fraternity and Sorority Community Report, which was published on the UCLA OFSL website.  Based on A&AS’s review, the Community Report did not include the average grade point average (GPA) for new Chapter members, which is a requirement under AB 524 (2022). Currently, the Community Report includes the average GPA for all chapter members (active and new). OFSL indicated that there were some difficulties compiling this information and is currently working with UCLA Student Affairs IT (SAIT) to address this issue.  \_\_\_\_\_\_\_\_\_\_\_\_\_\_  **Criteria:**  The AB 524 Campus-Recognized Sorority and Fraternity Transparency Act states that “beginning on or before July 1, 2023, and annually thereafter, campus-recognized sororities and fraternities must submit to their campus…. the average grade point average of new members of the campus-recognized sorority or fraternity.” | To ensure alignment with FTSA reporting requirements, OFSL should continue to work with SAIT to enhance the Community Report to include the average GPA for new members of Campus-recognized sororities and fraternities. | Response: OFSL is working with SAIT to modify the community report to include new member grade point averages for each chapter. The report update is currently in progress with SAIT.  Point Person: OFSL Director /OFSL Coordinator  Timeline: Completion by Winter 2024 to implement for Winter 2024 or Spring 2024 grade reports. |
| MONITORING AND REPORTING | | | | |
| Beginning in January 2021, the Office of Student Conduct (OSC) became the primary adjudicator of misconduct allegations under the UCLA Student Group Conduct Code (excluding sexual misconduct allegations which is handled by the Title IX Office). For the period January 2021 through January 2023, there were 14 cases of alleged misconduct by Greek organizations that went through the OSC investigation process.  Audit work included the following:   * Discussions with OFSL and OSC regarding the investigation process for misconduct allegations related to Greek chapters. * Reviewed Student Group Conduct Code procedures for investigating alleged violations of internal policies. * Reviewed a listing of all Student Conduct cases dated between January 2021 and January 2023 and performed an analysis to identify the number of cases that are currently open and how many cases have been closed (including determining the number of days it took to complete the case investigation). * Walkthrough and review of documentation retained by OSC for the investigation of one student group conduct case (e.g., notification letter to Greek Chapter, letter of recommended sanctions, final investigation report, student group acknowledgement).   The following observation was identified: | | | | |
|  | Case Investigation Timelines  Due to resource constraints, OSC has experienced extended delays in completing investigations of alleged student group misconduct related to Greek organizations.  Based on review of the case summary report, eight of 14 Greek student group conduct cases have been completed and closed as of September 2023. The number of days it took to complete the eight cases (incident date/date reported to the final resolution date) ranged from 164 days to 807 days, with an overall average of 513 days. Six cases remained open as of September 2023, of which three cases are over two years old (related to COVID-19 social distancing restrictions).  OSC indicated that the delays were primarily due to resource constraints and staff turnover during the pandemic as existing staff was used to absorb the student group conduct process in January 2021, with no additional headcount provided.  As of April 2023, OSC is fully staffed and an additional headcount has been approved to assist with student group cases which will improve the timeliness of investigations going forward. | A&AS supports OSC’s efforts to improve the timeliness of case investigations, including continuing to prioritize cases, establishing realistic timelines, and monitoring progress. | Response: OSC is working to establish internal timelines for case completion and to support staff training for report writing. OSC will review Fraternity Executives Association (FEA) and Association for Student Conduct Administrators (ASCA) best practices to identify opportunities to modify current case practices to align with industry standards.  Responsible Party: Interim Dean of Students/Associate Dean of Students  Timeline: Spring 2024 |
| CLERY ACT TRAINING | | | | |
| Audit work included the following:   * Reviewed training completion reports generated from the UCLA Learning Management System (LMS) as of July 2023 to determine whether OFSL employees completed Clery Act training.   The following observation was noted: | | | | |
|  | Review of LMS records revealed that no OFSL employees have completed Clery Act training provided through UCLA Student Affairs Risk Management. | OFSL should work with the UCLA Clery Compliance Officer to determine whether all OFSL staff members should be deemed Campus Security Authorities (CSA) under the University of California – Clery Act Policy, which would require relevant staff to complete Clery Act trainings. | Response: OFSL staff did not receive the training because of either staff family leave or because they are all new hires. OFSL will work with Student Affairs Risk Management and our Clery Coordinator to both complete the required trainings by this year and identify the annual training timeline.  Point Person: OFSL Coordinator  Timeline: Spring 2024 for this year’s training and Fall 2024 for ongoing annual training. |

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