

## **THE UNIVERSITY OF ALABAMA'S ACTION PLAN**

The University of Alabama at Tuscaloosa (“University”), has adopted an Action Plan to enhance the University’s ability to prevent and respond to discrimination based on race or national origin, characteristics that are protected by federal civil rights laws, and to further the University’s progress in increasing diversity in its fraternity and sorority system (“Greek system”).

In the Fall of 2013, in response to allegations of race discrimination in the selection process for new members in the University’s traditionally white sororities, the United States Department of Justice contacted the University to inquire about the allegations and the University’s response. At that time, the University was already undertaking a series of efforts to demonstrate the University’s commitment to a discrimination-free campus environment and increase diversity in the University’s recognized Greek organizations. Those efforts resulted in increasingly diverse 2013, 2014, and 2015 new member classes for University sororities. Since that time, the University has continued to explore ways to remove barriers to the Greek system and improve how the University responds to allegations of discrimination. This Action Plan is the result of that work.

The University believes that the full implementation of this Action Plan, coupled with the momentum generated by the University’s existing efforts, will strengthen the diversity of the University’s Greek system and enhance the University’s ability to prevent and address discrimination by: clarifying expectations for students and student organizations; establishing clear and consistent procedures for reporting, investigating, and responding to allegations of discriminatory conduct; and providing all students a supportive and welcoming campus climate free from racial hostility or exclusion.

### **I. The University commits to effective discrimination and harassment policies, effective complaint and investigation procedures, and consistent enforcement of these policies and procedures.**

- A. The Dean of Students is responsible for resolving formal and informal allegations of discrimination and harassment involving students and student social organizations, and for ensuring that the University is effectively implementing and enforcing applicable laws and University policies, regulations, procedures, and protocols related to discrimination and harassment (collectively, “Policies”).
- B. The University has reviewed and, where appropriate, revised, applicable Policies as well as related materials (*e.g.*, complaint forms, student and employee handbooks) to assist the University in promptly and appropriately responding to allegations of discrimination against students based on, among other things, race and national origin. To that end, the University has, among other things, drafted any necessary additional or amended Policies to include clear and comprehensive procedures for:
  - i. Prompt and accurate reporting of complaints to the Dean of Students, including protocols on:
    - 1. Referring complaints of discrimination levied against a social fraternity/sorority or its individual members to the Dean of Students; and

2. Coordination between the Dean of Students and the Office of Fraternity and Sorority Life (OFSL), including when and how to notify the appropriate governing council and/or national chapter about complaints of discrimination.
  - ii. Reporting and responding to formal and informal complaints, anonymous reports, and complaints from witnesses who are not the victims of the discriminatory conduct, in addition to guidance regarding whether and how any such allegations of discrimination or harassment implicate the Policies;
  - iii. Maintaining and preserving records related to allegations of discrimination and harassment, including notifications of complaints, interview notes, investigation summaries and reports, and documentation of remedial actions;
  - iv. Promptly and effectively responding to allegations of discrimination and harassment, including protocols for conducting and recording interviews with complainants, victims, alleged perpetrators, and witnesses; obtaining and maintaining necessary documents and other materials; preparing investigation summaries and reports; and identifying potential remedial measures and consequences;
  - v. Determining and administering consequences for violations of the University's Policies, such as written warnings, probations, mandatory training classes, restricted privileges, restitution, community service, and, where necessary, exclusionary discipline including suspensions and expulsions, as well as organizational sanctions.
- C. The University will continue to review applicable Policies and revise them as necessary to meet the above objectives.
- D. Beginning August 2016, all student organizations will be required to complete the following tasks in order to obtain or maintain University recognition:
  - i. All student organization Constitutions must contain the following statement: "Membership in registered student organizations shall be open to all students of The University of Alabama, without regard to race, religion, sex, disability, or national origin, color, age, disability, gender identity or expression, sexual identity, or veteran status except in cases of designated fraternal organizations exempted by federal law from Title IX regulations concerning discrimination on the basis of sex."
  - ii. All student organizations must be trained annually on University Policies, the discrimination/harassment complaint process (including procedures for the reporting, investigation, and resolution of complaints), as well as appropriate penalties for violations. Greek organizations must also prepare and submit to OFSL a Chapter Diversity Plan detailing initiatives and educational programs aimed at creating an environment of inclusivity and non-discrimination. Organizations that fail to participate in the training or submit a Chapter Diversity Plan may be subject to sanctions, including the loss of University recognition.
  - iii. All Greek organizations must submit to OFSL a copy of their current local and national non-discrimination policies, specifically those pertaining to membership selection and chapter operations.

- E. All Greek and Student Affairs publications must contain accurate information concerning the University's Policies. Notices concerning the Policies must be posted in appropriate locations throughout the campus, including in all student residential facilities, Greek housing included. Throughout the year, OFSL will spot check Greek system facilities for compliance with this posting requirement. Organizations not in compliance will be referred to the Office of Student Conduct.
- F. For 2015-2016, Panhellenic added a Director of Community Development and Outreach position as a permanent addition to its Executive Board. This individual acts as a liaison between the Greek governing councils and has specific oversight for those educational initiatives relating to risk management, peer education, diversity, nondiscrimination, and new member education.
- G. Organizations interested in constructing new chapter houses must submit a description of the organization's commitment to the recruitment of a diverse student membership and to the development of the intercultural competence of its members as it relates to the University's Strategic Plan for Diversity pursuant to Policy #FA-4 "Student Organization Construction Project Guidelines."

**II. The University will effectively communicate its commitment to diversity and inclusion to students, faculty, and staff and provide appropriate training and education on its non-discrimination policy and procedures.**

- A. The University has ensured that recruitment activities that showcase or involve the Greek system are designed to familiarize students with all of the social fraternities or sororities, facilitate increased cross-racial exposure, and encourage students to consider diversity in their recruitment, rush, and membership intake decisions.
  - i. The University will partner with appropriate offices and individuals on campus to identify students of diverse racial, ethnic, and national origin backgrounds for special recruitment initiatives. The University will develop a partner list of top feeder schools for minority students for special recruitment initiatives: targeted emails, invitations to Greek-specific events, and contacts with current Greek students.
  - ii. The University will also continue to offer throughout the year, to prospective students and their parents, fraternity and sorority life informational sessions (e.g. Bama Bound and University Days) showcasing the University's commitment to creating a welcoming and inclusive Greek community. Greek life informational sessions will either be All-Greek or gender specific (e.g. Fraternity Life at the Capstone) to give prospective students and their parents an overview of the various membership opportunities. Greek Ambassadors and OFSL staff members will make these presentations.
- B. OFSL will continue to maintain the *Update on Greek Integration* webpage. By July 1, 2016, the University will add a new section to the OFSL website that will link to various resources related to racial diversity and non-discrimination. Included among those resources will be webinars that provide a broad overview of Greek life and information on the recruitment and registration process for all Greek organizations. Each webinar provided a broad overview of

UA fraternity and sorority life, as well as information on diversity, non-discrimination, and the recruitment, registration and policies for all Greek governing councils. The *Update* and the new anti-discrimination and diversity resources page will be reviewed quarterly and updated appropriately.

- C. Training and education of the students, faculty, and staff who are part of the selection process and chapter operations is vital to increasing access to Greek organizations. The University provides on-going training on discrimination and harassment policies, the discrimination/harassment complaint process, as well as appropriate penalties for violations. Chapters will be required to submit documentation verifying that officers, members, and advisors are trained on and follow their local, national, and/or international chapters' non-discrimination policies as well as those of the University. Examples of training programs include:
- i. Greek-specific diversity training for Chapter Presidents and Greek Council Officers at the beginning of the spring semester as part of the Greek Leadership Summit. A diversity specific presentation has been permanently added to the curriculum and will be presented by an individual with expertise in this area. Records of attendance will be kept on file by OFSL and the failure to attend may result in sanctions.
  - ii. The University will also continue to host the Panhellenic Chapter Presidents' Sustained Dialogue Group to address diversity and inclusion issues. The presidents meet regularly during the academic year with the Director of Crossroads Community Center, UA's office for intercultural engagement to explore and make action plans for addressing issues of diversity and inclusion in the Panhellenic sororities. Using the same Sustained Dialogue model, Executive Council Inter-Greek Dinner Dialogues will be held on a regular basis in the 2015-16 academic year. These programs measure increased learning on issues of diversity and inclusion using pre and post event/dialogue anonymous evaluations. The review of these evaluations will aid in determining the program's effectiveness. The Crossroads Community Center will maintain the evaluations.
  - iii. Greek-specific diversity training for Greek Ambassadors at the beginning of the fall and spring semesters. Effective Spring 2016, the Greek Ambassador program was redesigned to allow any Greek Ambassador, regardless of Greek affiliation, to meet with a prospective student interested in fraternity and sorority membership.
  - iv. Inclusivity training specific to recruitment/rush/membership intake, such as the Ethical Recruiting Workshop for all Recruitment, Rush and Membership Intake Coordinators; the All-Greek Inclusive Recruitment Workshop; and the Panhellenic Diversity and Inclusion Leadership Workshop. OFSL will be responsible for ensuring qualified trainers and for keeping records of attendance.
  - v. The University will develop and implement in time for fall recruitment 2016 a training module for Sorority Recruitment Counselors, Judicial Board members, New Member Educators and Recruitment Directors on non-discrimination policies and the complaint process to be offered the week prior to fall recruitment.

- vi. OFSL will develop and implement in time for fall recruitment 2016 a training module to train recruiters, advisors, and other University employees regarding Greek life matters listed above so they are prepared to answer questions from prospective and current students. Those persons who participate in the training will complete pre and post training assessment to measure the effectiveness of the training. The assessments will be reviewed and retained by OFSL to measure the effectiveness of the training over time.

**III. The University will provide a welcoming and inclusive Greek Life program characterized by access, opportunity, and the embracing of diversity.**

- A. In addition to increasing access to information about the recruitment process and encouraging broader participation by students of diverse racial, ethnic, and national origin backgrounds in Greek life, the University intends to take or support additional steps to address other perceived barriers, including race, to the recruitment process. For example:
  - i. Developing with UA Panhellenic a generic Panhellenic recommendation form that can be submitted in lieu of a chapter-specific recommendation during the recruitment process. Obtaining recommendations for membership can be a challenge for women who are not connected to the Greek system through family, friends, or other legacy. Adding a generic recommendation will facilitate the application process for many, including students of diverse racial, ethnic, and national origin backgrounds, who may have otherwise been discouraged from participation due to this requirement.
  - ii. Supporting the Greek governing councils as they explore the possibility of funding financial need-based scholarships. The financial commitment associated with Greek membership can discourage participation in the process, with a particular impact on students of diverse racial, ethnic, and national origin backgrounds. Scholarships would assist members with their dues and would help facilitate the recruitment and retention of new members.
  - iii. Encouraging fraternity and sorority members and advisors to use their alumni networks to identify and encourage students of diverse racial, ethnic, and national origin backgrounds to participate in recruitment.
- B. The University reserves the right through OSFL to require recognized fraternities and sororities to implement other mechanisms (e.g., maintaining a national chapter presence during recruitment activities, permitting all fraternities and sororities to engage in a continuous open bidding process, etc.) to remove any perceived or real obstacles to recruitment for students of diverse racial, ethnic, and national origin backgrounds.

**IV. The University will monitor and evaluate the effectiveness of the programs and initiatives set out in this document.**

- A. OFSL will collect and maintain accurate records regarding the membership of each social fraternity and sorority by race and ethnicity, and it may compile similar information for all students participating in recruitment activities. The OFSL also will periodically evaluate the data to identify disparities and trends that relate to the implementation of this Agreement.

- B. Student Affairs will collect information regarding all discrimination complaints filed against student organizations, evaluate the data to identify patterns or trends, and take appropriate steps to resolve any concerns. Student Affairs also will retain appropriate records concerning its review and subsequent responsive actions. In addition, OFSL will collect information regarding all complaints filed about fraternities and sororities; evaluate the data to identify recurring problems or particular issues; and take appropriate steps to resolve any such problems.
- C. The University will conduct a bi-annual campus climate survey that assesses, among other things, the campus climate with regard to diversity, harassment, and discrimination, the effectiveness of the University's Policies, the University's commitments to diversity and inclusion, and access to and inclusion in University programs and activities, including the Greek system. The University will share the results of its annual survey and conduct listening sessions with the campus community.
- D. The University will continue to promote and modify, as needed, the initiatives documented herein to ensure that the University's student organizations are free of discrimination on the basis of race or national origin.

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The University is implementing this Action Plan of its own volition; nothing in this Plan should be construed as an admission by the University that its current Policies do not comply with existing law.

June 29, 2016