

Report of External Review



University of Nevada Las Vegas

April 22, 2022

Registered Student Organization Policies and Procedures

Report

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INTRODUCTION

In response to a request from the executive vice president and provost (provost) and vice president for student affairs (vice president), NASPA-Student Affairs Administrators in Higher Education (NASPA) proposed an external review to evaluate the University of Nevada Las Vegas (UNLV; the University) registered student organizations (RSOs), including fraternity and sorority life, policies and procedures. Specifically, the Review Team assessed registered student organization policies, procedures, and practices related to safety, well-being, and event management. The project was informed by best practices within the field of student affairs and is not intended to be a formal legal or compliance review.

The NASPA Review Team for this project consisted of two subject matter experts and one NASPA staff member. The subject matter experts were Dr. Kevin Bailey, vice chancellor for student affairs, University of North Carolina at Charlotte; and Dr. Patricia Whitely, senior vice president for student affairs, University of Miami; and the NASPA staff member was Ms. Abby Vollmer, director of NASPA Advisory Services.

METHODOLOGY

NASPA worked directly with the provost and his designees for project activities. The review consisted of the following activities: (1) introductory project call with the project leadership; (2) project participant brief; (4) document and data review; (5) select remote interviews and survey; and (6) report of findings, analysis, and recommendations.

INTRODUCTORY PROJECT CALL

NASPA coordinated an introductory project call with the provost, vice president, and their respective chief of staffs on February 2, 2022. The purpose of this call was to formally launch the project; review and discuss the project scope and priorities; discuss documents and data for NASPA to review; and clarify anticipated remote interviews.

PROJECT PARTICIPANT BRIEF

NASPA drafted and shared a project participant brief with the provost and his designees for distribution to participants of the external review. This document provided a high-level overview of the project activities and timeline. NASPA encouraged the provost and his designees to distribute it among all project participants prior to the project launch.

DATA COLLECTION AND REVIEW

NASPA developed a draft list of relevant documents and data for review. The Appendix of this report lists the types of documents shared with NASPA to inform the review.

REMOTE INTERVIEWS AND SURVEY

NASPA developed and shared a list of remote interview requests consisting of individual and group meetings to help provide additional clarity to the documents and data provided to the Review Team. NASPA met with various members of the UNLV community during the remote interviews including staff in Student Union and Event Services, Student Involvement, and Fraternity and Sorority Life. A list of meeting participants from the remote interview period is in the Appendix.

The Review Team also identified the need to solicit feedback from registered student organization leaders. NASPA worked with UNLV to provide registered student organization leaders access to the custom survey. The survey was distributed to 1,691 students on March 7, 2022. NASPA compiled the aggregate responses from the survey. Summaries were then shared with members of the Review Team for consideration in our analysis.

REPORT OF FINDINGS, ANALYSIS, AND RECOMMENDATIONS

This report contains NASPA's findings, analysis, and recommendations based on all project activities. It is intentionally structured around major themes and findings that emerged through all project activities including NASPA's review of documents, remote interviews, and custom survey.

FINDINGS AND ANALYSIS

Overview

The University of Nevada Las Vegas is a large, doctoral-degree-granting university that has recently emerged as an R1 “very high research activity” institution. UNLV is primarily a non-residential campus that is located less than two miles from the Las Vegas Strip. The University serves 31,142 students, 25,864 of which are undergraduate students who are predominantly from in-state and are 24 years of age or younger.¹ As a minority-serving institution, UNLV “provides access to world-class educational experiences that are responsive to the needs of our students and stakeholders; engages in ground-breaking research, scholarship, professional and creative activities that have impact and cross boundaries; and offers high-value, cutting-edge interdisciplinary physical and mental health care to support our community. We [UNLV] create value for the individuals we serve by fostering a climate of innovation, stimulating economic diversification and workforce development, promoting social justice and inclusion of all voices and enriching cultural vitality.”²

The Division of Student Affairs is a robust division that provides numerous programs and services to facilitate student learning, support personal development, and foster a safe and vibrant campus community. The Division is led by the vice president for student affairs. Within the Division, there are multiple functional units, including the Student Life unit which encompasses departments and programs such as Campus Recreation, Housing and Residential Life, Service Learning and Leadership, Student Life Maintenance and Technology, Student Diversity and Social Justice, Student Involvement and Activities, Student Life Business Services, and Student Union and Event Services. The Student Life unit is led by the associate vice president for student life.

¹ <https://nces.ed.gov/ipeds/>

² <https://www.unlv.edu/about/mission>

Student Involvement and Activities (SIA) supports more than 350 registered student organizations and includes Fraternity and Sorority Life (FSL) which provides oversight to over thirty-eight chapters. An executive director of student engagement supervises SIA. A director for student involvement and activities reports to the executive director; that director supervises the assistant director for fraternity and sorority life, who is the highest ranking FSL professional in the unit. (This position was recently filled and the person in this role is still considered an interim.)

Student Union and Event Services (SUES) work closely with SIA and registered student organizations, including fraternities and sororities, to facilitate on-campus space and resource needs. This area is led by a director for student union and events services. Professional and student staff within SUES manage the event reservation process.

The following sections are based on the Review Team’s analysis of UNLV’s registered student organizations, including fraternities and sororities, policies and procedures. A thorough review of policies and procedures must also include an exploration into how policies and procedures are put into practice and how current staffing models and organizational systems support or inhibit effective utilization of the policies and procedures.

These sections draw from relevant areas within the CAS Standards and Guidelines³ (including Campus Activities Programs, Fraternity and Sorority Advising Programs, and Conference and Event Programs) and the co-published resource from NASPA and the Association of Fraternity/Sorority Advisors, *Recommendations for Excellence in Fraternity and Sorority Life*⁴. Individual excerpts from the CAS standards and NASPA/AFA recommendations report, where applicable, are *italicized* with corresponding areas listing respective strengths, challenges, and recommendations.

³ Council for the Advancement of Standards in Higher Education (2019). *CAS professional standards for higher education* (10th Ed.). Washington, DC: Author. To learn more about CAS and purchase full copies of the standards, visit: <https://www.cas.edu/standards>

⁴ The full report, released in September 2021, is available for download here: https://www.naspa.org/files/dmfile/Excellence_FSL_Report_2021.pdf

Policies, Procedures, and Practices

General

Campus Activities Programs (CAP) must have written policies and procedures on operations, transactions, or tasks that have legal implications. CAP must have and follow a timeline for reviewing policies and procedures. The creation and revision of policies and procedures must be informed by available evidence, and policies and procedures that inform the management of higher education. CAP must have policies and procedures consistent with institutional policy for responding to threats, emergencies, and crisis situations. (9.4, Policies and Procedures, Campus Activities Programs, CAS)

Fraternity and Sorority Advising Programs (FSAP) must have written policies and procedures on operations, transactions, or tasks that have legal implications. FSAP must have and follow a timeline for reviewing policies and procedures. The creation and revision of policies and procedures must be informed by available evidence, and policies and procedures that inform the management of higher education. FSAP must have policies and procedures consistent with institutional policy for responding to threats, emergencies, and crisis situations. (9.4, Policies and Procedures, Fraternity and Sorority Advising Programs, CAS)

Institutions and organizations should have a consistent, focused, and documented approach to support all students and stakeholders. (NASPA/AFA Report, Communication Standards Between Organizations and Institutions Working Group Recommendations, Section 3, page 22)

RSOs have a comprehensive manual that was most recently revised in 2021. Student Involvement and Activities has a robust website⁵ with many easy to navigate links and virtual resources for students interested in organizations, RSO leaders, and RSO advisors.

Fraternity and Sorority Life has a partnership agreement document that articulates the relationship between Greek chapters, the governing councils, and the University. The document indicates that this agreement was established in 2008 and its most recent amendment was in 2017. Current FSL staff shared a lack of understanding of how this agreement informed daily practices and how issues of accountability on any of the involved partners were addressed. The Review Team was also provided with a detailed Fraternity and Sorority Life Philanthropy/Fundraising Competition

⁵ <https://www.unlv.edu/sia>

Policy document; however, staff indicated this document was not currently being utilized to manage FSL philanthropic events.

The Review Team recognizes the depth of the existing manuals and guiding documents that exist within SIA and FSL. However, it is important that all guiding documents and resource repositories be kept current, are relevant, and have a regular review process.

Additionally, within the RSO policies it recommends, but does not require registered student organizations to have a constitution or by-laws. However, the RSO manual regularly references how organizations should have various elements, such as fiscal management processes, outlined within their RSO constitution.

Finally, the Review Team appreciates that UNLV emphasizes the use of liability waivers by RSOs and provides student organizations with links to approved waivers. However, there is a lack of clarity around the maintenance and duration of storage of these waivers. The Review Team also noted that despite the sample waiver being provided, not all RSOs appear to be using the same waiver template (e.g., documents shared with the Review Team included Kappa Sigma philanthropic event waivers that appear to have come from their national organization.)

Recommendations:

- 1) All guiding documents for RSOs, including those specific to FSL, should undergo regular, annual review.
- 2) The FSL partnership agreement needs to undergo a significant evaluation. Review the recommendations provided in the NASPA/AFA report by the Communication Standards Between Organizations and Institutions Working Group on how to approach revisions to this agreement.
- 3) Eliminate the FSL philanthropy/fundraising competition policy document. FSL chapters should be expected to follow the same policies and procedures outlined for all RSOs.
- 4) Consider requiring all student organizations to have constitutions and by-laws on file with the Involvement Center. The creation of constitution and by-laws should be a pre-requisite for organization registration and eligibility for CSUN and other University-affiliated funding sources.

- 5) Clarify expectations around the necessity of, access to, and storage of liability waivers.
- a) All student organizations, including FSL chapters, should be using the standard waiver approved by UNLV Risk Management and General Counsel as indicated in the RSO Risk Management online training (slide 6). (In the case of Kappa Sigma, the “participant contract” appears that it is from the national fraternity and not UNLV. Further, that participant contract required a notary and none of the recent contracts provided to the Review Team were notarized.)
 - b) RSOs should be expected to store digital copies of the waivers in a shared location for an agreed upon timeline approved by UNLV Risk Management and General Counsel. The shared location should be accessible by Involvement Center and FSL staff.
 - c) RSOs should receive further guidance on how to safely store (and eventually destroy after the appropriate amount of time) paper copies of waivers.
 - d) Provide additional training that outlines under what circumstances a waiver is required and who needs to be engaged in making the determination.

Training and Education

Campus Activities Program leaders must ensure that personnel are knowledgeable about and trained in safety, emergency procedures, identifying threatening conduct or behavior, crisis prevention, response, and reporting. (7.3, Personnel Training and Development, Campus Activities Programs, CAS)

Fraternity and Sorority Advising Program leaders must ensure that personnel are knowledgeable about and trained in safety, emergency procedures, identifying threatening conduct or behavior, crisis prevention, response, and reporting. (7.3, Personnel Training and Development, Fraternity and Sorority Advising Programs, CAS)

Fraternity and Sorority Advising Programs must facilitate or provide resources, workshops, programs, retreats, and seminars on relevant topics for members (e.g., multicultural competence, leadership development, recruitment and intake, and risk management). FSAP must support members in coordinating life safety, facility management, and risk management programs in conjunction with local agencies. (2.2, Program Information and Services, Fraternity and Sorority Advising Programs, CAS)

Campus Activities Programs must provide advisors with training on legal issues and institutional policies, especially regarding risk management. (2.2, Program Information and Services-Advising Student Organizations, Campus Activities Programs, CAS)

Student Involvement and Activities, via the assistant director for student involvement and the program coordinator for campus activities, facilitates all registered student organization leader and advisor trainings. New student organizations must complete the registration process through the Involvement Center and complete the required RSO Leader Training via the Canvas learning management system. They must also attend a New RSO Meeting. Existing student organizations must re-register annually and complete the aforementioned RSO Leader Online training. Both new and existing student organizations must have their organization's UNLV-affiliated advisor submit their online Advisor Agreement Form annually, of which one of the items includes affirmation that they have reviewed the RSO Training. New advisors must complete an onboarding training but returning advisors do not have to complete any additional or advanced training.

The online RSO Leader Training consists of twenty-eight slides covering numerous topics including basic risk management, hazing, Title IX, and the Clery Act. The review team was provided with the script and slide deck but did not view the actual presentation. It is not clear if there is any type of assessment associated with the training to gauge participant learning. One role play scenario is included in the training yet there is no mechanism for students to ask questions about that scenario or others or to learn from their peers.

The RSO Manual includes a brief section on Risk Management as well as a Risk Management Matrix tool that students are encouraged, but not required, to consider using when event planning. The role play scenario in the online RSO Risk Management Training does not make mention of the Matrix tool. The training is silent on the liability of student organization leaders as contract signers and does not clarify that RSO leaders could be held legally responsible for contract violations. Both the training and the manual emphasize the use of waivers and provide information on how to access template waivers. Fraternity and Sorority Life staff shared they offer an attendance-optional "Risky Business" series that covers a variety of risk management-related topics.

While a framework exists for registered student organization leaders and their advisors to receive risk management training, the current scope of this training is limited and the application of risk management practices, beyond the use of liability waivers, is encouraged rather than required. It is also unclear how the role of the UNLV faculty/staff advisor is differentiated from the student leader in relationship to risk management expectations. (Additionally, as will be outlined in the next section, the burden of risk management presently seems to fall on the SUES team for on-campus events.)

Recommendations:

- 6) Increase the required RSO training on risk management to include more practical application exercises involving the Risk Management Matrix tool.
- 7) Require RSOs to complete and share the Risk Management Matrix with their RSO advisor and submit it to SUES as a part of the event planning process.
 - a) This documentation should be also digitally stored in a shared location where professional staff in the Involvement Center and FSL can have access, as needed.
- 8) The RSO training should make plain the liability that accrues with contract signers, organizational leaders, and potentially others who knew of risk yet did nothing to intervene or alert someone in authority that it should be mitigated.

Event Management

Conference and Event Programs (CEP) must have written policies and procedures on operations, transactions, or tasks that have legal implications. CEP must have and follow a timeline for reviewing policies and procedures. The creation and revision of policies and procedures must be informed by available evidence, and policies and procedures that inform the management of higher education. CEP must have policies and procedures consistent with institutional policy for responding to threats, emergencies, and crisis situations. (9.4, Policies and Procedures, Conference and Event Programs, CAS)

Regardless of organizational structures, CEP must work in close consultation and collaboration with others with expertise and resources to meet the needs and interests of students and designated clients. (2.3, Program Structure and Framework, Conference and Event Programs, CAS)

Student Union and Event Services (SUES) is the umbrella unit that includes the Conference and Event Services department at UNLV. Both SUES and Conference and

Event Services have extensive policy and procedure manuals that have been recently revised, as well as a structured online reservation process.

RSOs who want to reserve most on-campus spaces must work through the SUES reservation process. To reserve a space and receive the benefits of an RSO, the registrant must be from an organization that is identified in the Involvement Center as an active, registered student organization. Additionally, the registrant must be on record in the Involvement Center as the Scheduling Liaison for that organization. The online reservation form includes a series of questions regarding event needs including date, time, space, set-up requirements, and a series of 'declarations' that may identify if an event should be flagged for further review. These declarations include considerations such as the engagement of an outside speaker/facilitator, live band/performers, vendors, media presence, food, beverage or alcohol requests, and the collection of money, such as admission.

The event form then gets submitted to a shared inbox that is accessible by SUES front desk student staff. Student Reservation Assistants review that submission to determine if the event can proceed as is, needs correction (such as not having the appropriate Scheduling Liaison identified), or needs to be elevated for further review. If the student team flags an event for further review, it first goes to a Reservations Coordinator (a professional staff member) for assessment. The Reservations Coordinator determines whether an event can proceed to scheduling or needs to be assigned to an Events Coordinator. The Events Coordinator facilitates a meeting with the RSO Scheduling Liaison to complete event set up needs and facilitates any necessary University Risk Management & Safety requirements and notifications. For on-campus events that are clearly identified as high-risk or inherently dangerous events, there appears to be strong protocols in place for mitigating risk. One example of this practice is that for the use of on-campus fire pits, UNLV requires a fire certificate and access to appropriate fire prevention equipment.

A highly structured process exists for the support of RSO on-campus events. However, there are also opportunities to enhance this process. First, while the declarations on the form can serve as a filter for the student Reservation Assistants, there is no checklist or standard flow chart to indicate that something must be sent to professional staff for review. (It was shared with the Review Team that the

exceptions to this are events that involve youth or alcohol which are required to be sent to the Reservations Coordinator.)

Additionally, the online form allows for a generic event title (such as “Group Meeting”) and there is no minimum text required for the description of the event. Establishing enhanced parameters here could help prevent events that seem to have minimal risk but in actuality are more complex from being fast-tracked through the reservations process.

Further, the RSOs form includes the name of the advisor that is identified within the Involvement Center records. This advisor is notified via the confirmation email only when an event has been confirmed by SUES. Presently, staff in the Involvement Center do not see event submission forms. Staff in FSL only receive a notification if they are the default advisor of record in the Involvement Center.

There is little to no oversight of registered student organizations, including fraternity and sorority chapter, off-campus events. Current practice allows student organizational leaders to enter contracts with off-campus venues; UNLV advisors and SIA staff do not have to be made aware of the events or the related contractual agreements.

The relationship between the university and student organizations is a complex one. On one hand, minimalist oversight by university personnel creates a distance from student organizations that may not equate to supervision or even tacit endorsement of their purpose or programs even though the public may have a different perception of the relationship. On the other hand, maximum oversight and approval of programs leaves no room for universities to claim ignorance about an organization’s purpose or programs. The answer for UNLV, we believe, lies somewhere in the middle.

Recommendations:

- 9) Define more clearly the event reservation process (through a required checklist or flow chart) by which events get flagged for professional staff review.
 - a) Consider requiring RSOs to attach the Risk Management Matrix with their submission. This would serve as a supplemental document and should not supersede SUES internal flags.

- 10) The online form should require events to have a descriptive title and detailed event description. If an event does not have a clearly articulated event name or explanation of the event, it should not proceed and instead the front-line staff should follow up to request a correction before it can advance for further review.
- 11) Professional staff in the Involvement Center and Fraternity and Sorority Life should be notified if a general RSO or FSL event has been flagged for professional staff review. They do not necessarily need to be involved in the SUES event management process but can help serve as a resource and support to the RSO.
- 12) With consideration to off-campus events, there should be an RSO event registration or review process that is comparable to the event registration procedures for on-campus events. Specific to FSL, fraternities and sororities should be required to collaborate with their designated full-time staff to register their events, provide proof of liability insurance, and waivers as required for on-campus events. Examples of applicable events could include off-campus social events at third-party venues and sponsored off-campus philanthropy events.
 - a) The University can have a clearly stated policy that no student can contract on its behalf. In the event an organization is seeking approval of a high-risk activity on or off-campus, the University can also require review and approval of the event by the organization's national office.

Fiscal Management

Students who have fiscal responsibility relative to CAPS programs and services must be provided with information and training regarding institutional regulations and policies that govern accounting and the appropriate handling of funds. Student organizations may be required to maintain funds with the institution's business office in which an account for each group is established and where bookkeeping and auditing services are provided. Within this framework, CAP should work collaboratively with student organizations on matters of bookkeeping, budgeting, and other matters of fiscal accountability, including contract negotiations, consistent with institutional practices. (2.2, Program Information and Services-Stewardship of Student Activity Fees, Campus Activities Programs, CAS)

UNLV currently does not broadly enable RSOs to have University accounts; if an RSO has a UNLV account it is most often an organization that is financially sponsored by a UNLV department. To manage their fiscal resources, RSOs usually have a non-UNLV bank account. SIA provides basic guidance for managing accounts to both student leaders and advisors within the general RSO manual and a brief budget

training module. Advisors are instructed to not serve as signature authorities for off-campus bank accounts and RSOs are provided instructions on how to establish their own Employer Identification Number (EIN)/Tax ID number. Additionally, RSOs must manage their own contracts and are not able to utilize University processes to ensure best practices around contract negotiation. SIA does not track or have access to RSO bank account or contract information.

Staff in SIA shared that there have been multiple attempts to create University accounts for registered student organizations, yet they have been met with resistance from senior administration. Staff in SIA recognize that with the current “off-campus” model they have a significant lack of account oversight, and it is much more difficult to effectively audit the use of student fee dollars. Staff also recognize that if University accounts were established this could also help create a pathway by which RSO contracts could be routed through University channels for enhanced evaluation. If this were to happen, staff articulate the need for additional human resources to manage this process given the high number of student organizations at UNLV.

Recommendations:

- 13) If RSO leaders are going to be expected to enter legally binding contracts as the signature authorities, more training is critical. Increase training to RSO leaders and advisors on contract management, with an emphasis on understanding liability and indemnification. If the university is unwilling to provide this service, a third party can be contracted who can.
- 14) Consider models for RSO campus bank accounts from other institutions within the Nevada System of Higher Education. The University of Nevada Reno was mentioned as a peer that allows student organizations to have on campus bank accounts.
- 15) RSO should be expected to have a minimum set of documented fiscal management and fiscal decision-making standards. These should include expectations around where contracts and account information are stored.

Leadership, Staffing, and Structure

Professional Staff

It is recommended that...directors/senior fraternity/sorority advisors (FSAs) are considered peers to other department directors. If you are operating a fraternity/sorority advising operation at a flagship institution, this recommendation is a MUST...Given the risks associated with FSL, it is critical to reduce the number of reporting levels between the senior FSA and the SSAO. (NASPA/AFA Report, Fraternity and Sorority Life Staffing Working Group Recommendations, Organizational Positioning, page 51)

The level of Fraternity and Sorority Advising Programs staffing must be established and reviewed regularly with regard to demands, enrollment, diversity of services offered, institutional resources, and other services available on the campus and in the local community. (7.1, Staffing and Support, Fraternity and Sorority Advising Programs, CAS)

Campus Activities Programs (CAP) must identify the level of staffing necessary to achieve its mission and goals. (7.1, Staffing and Support, Campus Activities Programs, CAS)

Conference and Event Programs (CEP) must identify the level of staffing necessary to achieve its mission and goals. (7.1, Staffing and Support, Conference and Event Services, CAS)

Robust policies and procedures are only as effective as the staff and structures that exist to develop, monitor, and enact them. The Review Team heard from staff across all the primary units involved in this review (SUES, SIA, and FSL) about recent or on-going staff vacancies. For example, the senior most FSL staff member is an interim assistant director who just began in their role in January 2022; currently, there are two full-time staff members in FSL. At the time of the review, SUES was down almost 50% of their event management staff. Both areas are in critical need of a staffing audit. According to the Director of SIA, neither she nor her supervisor, the Executive Director, have any explicit FSL responsibilities in their job descriptions. The perception is that the small FSL team, who are relatively inexperienced, operate largely autonomously.

Recommendations:

- 16) Critically evaluate the staffing models in all involved units, especially FSL.
- a) In FSL, the Review Team strongly encourages that UNLV consider the recommendations from the NASPA/AFA report, specifically the Fraternity and Sorority Life Staffing Working Group.
 - i) FSL should be led by someone at a director-level or equivalent position. Elevation of the senior most position to director-level or equivalent would also foster greater access to and communication Division senior-leadership.
 - ii) A second option, or additional option, would be to articulate an enhanced scope of responsibility around FSL oversight and supervision for the Director of SIA and the Executive Director.
 - b) The Review Team appreciates the robust student employment model that is utilized by SUES for their event management processes; however, the utilization of para-professional staff cannot replace the hiring of qualified professional staff who serve as the critical gatekeepers of risk mitigation.

Advisors

Campus Activities and Programs must define the role and responsibilities of advisors outside of department personnel. (2.2, Program Information and Services- Stewardship of Student Activity Fees, Campus Activities Programs, CAS)

All registered student organizations, including fraternity and sorority life chapters, must have a UNLV staff or faculty member on record as their advisor. Training is offered both in-person and via Canvas at the inception of becoming an advisor yet nothing ongoing is offered. All advisors must complete a simple advisor agreement before they can be listed as the advisor within the Involvement Center system. While the SIA website provides some clickable resources related to the definition of an advisor⁶, both the resources and the agreement provide a lot of latitude in how the role of advisor can be interpreted. The resources also describe the unique relationship between UNLV and registered student organizations; however, the resources do not address, even broadly, advisor liability.

⁶ <https://www.unlv.edu/sia/student-orgs/advising>

Further, at the time of the review, almost 80% of fraternity and sorority chapters did not have a true UNLV faculty/staff advisor; instead, FSL staff, by default, were listed as the primary UNLV advisor for purposes of registration in the Involvement Center. In addition to UNLV advisors, FSL organizations also have chapter advisors; however, the chapter advisor is typically not a UNLV faculty/staff member. The unique roles and responsibilities of these two advisors is unclear.

Recommendations:

- 17) Clarify the definition and responsibilities of the UNLV faculty/staff advisor and FSL chapter advisors.
 - a) FSL staff should not be serving as the UNLV faculty/staff advisor for the majority of the organizations. This role should only be briefly assumed by FSL staff during times of advisor transition.
 - b) While balancing the weight of the volunteer advisor involvement with the importance of student organization autonomy is a delicate task, advisors need to be more aware of their RSOs activities. Create (or promote) mechanisms by which information can be easily shared between RSO leaders, their advisors, and SIA staff.

Student Organization Leaders

Fraternity and Sorority Advisor Programs must assist members and chapters in understanding their rights and responsibilities as part of the institution. (2.2, Program Information and Services, Fraternity and Sorority Advising Programs, CAS)

The University places clear expectations on student organization presidents related to organization registration, on-campus space usage, and roster management. Student organization presidents must sign the RSO President Acknowledgement Statement which outlines many of the aforementioned obligations, but also includes elements related to liability and risk. One such element indicates that presidents are considered Campus Security Authorities (CSA) and must complete a related online training. However, the RSO manual indicate that only advisors are CSAs. The Review Team also noticed in our review of documents that there were inconsistencies in rosters.

Recommendations:

- 18) It is unique that UNLV has designated RSO Presidents as Campus Security Authorities. The Review Team encourages UNLV to review this practice and ensure that, if this designation is to continue, that training and support for RSO Presidents is comparable to the weight of this responsibility. Additionally, ensure that all documentation, both in manuals and online is consistent with the identification of who is and who is not a CSA.
- 19) Roster management is especially critical for FSL chapters. FSL staff should collaborate with national offices and chapters to reconcile rosters and track members at least twice annually.
- 20) It would benefit the University to develop a method to communicate the expectations for student organizations with all members of the community. This could be a once per semester email that outlines items such as involvement expectations, advisor responsibilities, and risk management practices.

SUMMARY OF RECOMMENDATIONS

In order to successfully support registered student organizations, UNLV should engage in the following:

Policies, Procedures, and Practices: General

- 1) All guiding documents for RSOs, including those specific to FSL, should undergo regular, annual review.
- 2) The FSL partnership agreement needs to undergo a significant evaluation. Review the recommendations provided in the NASPA/AFA report by the Communication Standards Between Organizations and Institutions Working Group on how to approach revisions to this agreement.
- 3) Eliminate the FSL philanthropy/fundraising competition policy document. FSL chapters should be expected to follow the same policies and procedures outlined for all RSOs.
- 4) Consider requiring all student organizations to have constitutions and by-laws on-file with the Involvement Center. The creation of constitution and by-laws should be a pre-requisite for organization registration and eligibility for CSUN and other University-affiliated funding sources.
- 5) Clarify expectations around the necessity of, access to, and storage of liability waivers.
 - a) All student organizations, including FSL chapters, should be using the standard waiver approved by UNLV Risk Management and General Counsel as indicated in the RSO Risk Management online training (slide 6). (In the case of Kappa Sigma, the “participant contract” is from the national fraternity and not UNLV. Further, that participant contract required a notary and none of the contracts provided to the review team are notarized.)
 - b) RSOs should be expected to store digital copies of the waivers in a shared location for an agreed upon timeline approved by UNLV Risk Management

and General Counsel. The shared location should be accessible by Involvement Center and FSL staff.

- c) RSOs should receive further guidance on how to safely store (and eventually destroy after the appropriate amount of time) paper copies of waivers.
- d) Provide additional training that outlines under what circumstances a waiver is required and who needs to be engaged in making the determination.

Policies, Procedures, and Practices: Training and Education

- 6) Increase the required RSO training on risk management to include more practical application exercises involving the Risk Management Matrix tool.
- 7) Require RSOs to complete and share the Risk Management Matrix with their RSO advisor and submit it to SUES as a part of the event planning process.
 - a) This documentation should be also digitally stored in a shared location where professional staff in the Involvement Center and FSL can have access, as needed.
- 8) The RSO training should make plain the liability that accrues with contract signers, organizational leaders, and potentially others who knew of risk yet did nothing to intervene or alert someone in authority that it should be mitigated.

Policies, Procedures, and Practices: Event Management

- 9) Define more clearly the event reservation process (through a required checklist or flow chart) by which events get flagged for professional staff review.
 - a) Consider requiring RSOs to attach the Risk Management Matrix with their submission. This would serve as a supplemental document and should not supersede SUES internal flags.
- 10) The online form should require events to have a descriptive title and detailed event description. If an event does not have a clearly articulated event name or explanation of the event, it should not proceed and instead the front-line staff should follow up to request a correction before it can advance for further review.
- 11) Professional staff in the Involvement Center and Fraternity and Sorority Life should be notified if a general RSO or FSL event has been flagged for professional

staff review. They do not necessarily need to be involved in the SUES event management process but can help serve as a resource and support to the RSO.

- 12) With consideration to off-campus events, there should be an RSO event registration or review process that is comparable to the event registration procedures they follow for on-campus events. Specific to FSL, fraternities and sororities should be required to collaborate with their designated full-time staff to register their events, provide proof of liability insurance, and waivers as required for on campus events. Examples of applicable events could include off campus social events at third party venues and sponsored off campus philanthropy events.
 - a) The University can have a clearly stated policy that no student can contract on its behalf. In the event an organization is seeking approval of a high-risk activity on or off campus the University can also require review and approval of the event by the organization's national office.

Policies, Procedures, and Practices: Fiscal Management

- 13) If RSO leaders are going to be expected to enter legally binding contracts as the signature authorities, more training is critical. Increase training to RSO leaders and advisors on contract management, with an emphasis on understanding liability and indemnification. If the university is unwilling to provide this service, a third party can be contracted who can.
- 14) Consider models for RSO campus bank accounts from other institutions within the Nevada System of Higher Education. The University of Nevada Reno was mentioned as a peer that allows student organizations to have on campus bank accounts.
- 15) RSO should be expected to have a minimum set of documented fiscal management and fiscal decision-making standards. These should include expectations around where contracts and account information are stored.

Leadership, Staffing, and Structure: Professional Staff

- 16) Critically evaluate the staffing models in all involved units, especially FSL.

- a) In FSL, the Review Team strongly encourages that UNLV consider the recommendations from the NASPA/AFA report, specifically the Fraternity and Sorority Life Staffing Working Group.
 - i) FSL should be led by someone at a director-level or equivalent position. Elevation of the senior most position to director-level or equivalent would also foster greater access to and communication Division senior-leadership.
 - ii) A second option, or additional option, would be to articulate an enhanced scope of responsibility around FSL oversight and supervision for the Director of SIA and the Executive Director.
- b) The Review Team appreciates the robust student employment model that is utilized by SUES for their event management processes; however, the utilization of para-professional staff cannot replace the hiring of qualified professional staff who serve as the critical gatekeepers of risk mitigation.

Leadership, Staffing, and Structure: Advisors

- 17) Clarify the definition and responsibilities of the UNLV faculty/staff advisor and FSL chapter advisors.
- a) FSL staff should not be serving as the UNLV faculty/staff advisor for the majority of the organizations. This role should only be briefly assumed by FSL staff during times of advisor transition.
 - b) While balancing the weight of the volunteer advisor involvement with the importance of student organization autonomy is a delicate task, advisors need to be more aware of their RSOs activities. Create (or promote) mechanisms by which information can be easily shared between RSO leaders, their advisors, and SIA staff.

Leadership, Staffing, and Structure: Student Leaders

- 18) It is unique that UNLV has designated RSO Presidents as Campus Security Authorities. The Review Team encourages UNLV to review this practice and ensure that, if this designation is to continue, that training and support for RSO Presidents is comparable to the weight of this responsibility. Additionally,

ensure that all documentation, both in manuals and online is consistent with the identification of who is and who is not a CSA.

19) Roster management is especially critical for FSL chapters. FSL staff should collaborate with national offices and chapters to reconcile rosters and track members at least twice annually.

20) It would benefit the University to develop a method to communicate the expectations for student organizations with all members of the community. This could be a once per semester email that outlines items such as involvement expectations, advisor responsibilities, and risk management practices.

APPENDIX

Documents

This section provides an overview of the types of document UNLV shared with NASPA to help inform this review.

Facilities and Room Reservation Policies

- SUES Reservation Process and SIA Registered Student Organization Process (February 2022)
- UNLV Student Union & Event Services Conference & Event Services Notebook (undated)
- UNLV Student Union & Event Services Department Manual (revised May 2021)
- UNLV Student Union & Event Services General Reservation Policy (revised October 2021)

Fraternity and Sorority Life Documents

- Philanthropy/Fundraising Competition Policy (revised February 2019)
- Philanthropy Dates, Excel, undated
- University of Nevada, Las Vegas & Social Greek Letter Organizations Housed in Fraternity and Sorority Life Partnership Agreement (amended June 27, 2017)

Kappa Sigma Documents (*list denotes documents provided that were considered relevant for review)*

- Historical Information on Other Events:
 - General Reservation Request 65948, email, 11/6/2019
 - 64958 Reservation Summary, email, 11/7/2019
 - Change/Cancellation Request, email, 11/11/2019
 - Space Not Available, email correspondence, 11/12/2019
 - Updated Reservation, email correspondence, 11/12/2019
 - 69458 Reservation Summary Confirmation and Diagram, email correspondence, 11/13/2019
 - 69458 Reservation Summary, printed 11/7/2019
 - 69458 Reservation Summary 2, printed 11/12/2019
- Kappa Sigma re-registration 2021-2022

- Philanthropy Documents:
 - Boot Camp Event:
 - KSig Boot Camp Packet, 2008
 - Boot Camp, philanthropy documents, 2010
 - KS Boot Camp Packet, 2014
 - KSig Boot Camp Packet, 2015
 - Boot Camp Packet, 2017
 - Kappa Sigma Bootcamp Packet, 2020
 - Fight Night 2021:
 - General Reservation Request 70613, email, 10/4/2021
 - Event 70613, email, 10/11/2021
 - Fight Night Participant Verification
 - Kappa Sigma Certificate of Liability Insurance
 - Kappa Sigma Incident Contact Sheet
 - Kappa Sigma Roster, 11/23/2021
 - Participant Contracts, scanned copies
 - Reservation Summary 70613, printed, 11/12/2021
 - Scheduling Liaison-Response Requested 70613, email, 10/5/2021
 - Sigma Alpha Epsilon Roster, 11/23/2021
 - Venue Contract, Sahara Events Center, undated
 - 70613 Reservation Summary Confirmation and Diagram, email correspondence, 11/12/2021
 - 70613 Updated Reservation Summary Confirmation and Diagram, email correspondence, 10/12/2021

Organizational Charts/Staffing Information

- Division of Student Affairs Organizational Chart (updated February 2022)
- Division of Student Affairs-Student Life Unit, Department-Management Organizational Chart (updated November 29, 2021)
- Student Life Employee Listing (updated February 2022)

Registered Student Organization Documents

- Registered Student Organization Manual (revised 2021)
- RSO Advisor Agreement (form view, November 29, 2021)
- RSO President Agreement (form view, undated)
- RSO Required Training (slide deck, undated)
- RSO Training Canvas Module script (undated)
- Student Involvement & Activities website (printable view, January 24, 2022)

Remote Interview Schedule

Friday, February 25, 2022

12:30 pm-1:00 pm	Student Union & Event Services (Group) <ul style="list-style-type: none">• <i>Tristan Clark</i>• <i>Shanna Kinzel</i>
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Monday, February 28, 2022

11:00 am-11:30 am	Director Student Involvement (Interview) <ul style="list-style-type: none">• <i>Savannah Baltera</i>
11:30 am-12:00 pm	Fraternity and Sorority Life (Group) <ul style="list-style-type: none">• <i>Craig Shook</i>• <i>Jordan Fischette</i>
12:30 pm-1:00 pm	Assistant Vice President for Student Life (Interview) <ul style="list-style-type: none">• <i>Renee Watson</i>



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