



# The College Alcohol Responsibility Program

## I. Overview

The problems of underage and abusive drinking are especially severe among college students. The Responsible Retailing Forum (RRForum) has, since 2004, been researching ways in which licensees and communities can reduce underage sales and service of beverage alcohol and excessive drinking in licensed establishments. Marquette University, an RRForum partner in an alcohol responsibility initiative in Milwaukee, introduced RRForum to the International Town & Gown Association (ITGA), an organization of college and university communities whose members report that student alcohol use and abuse has a major impact upon other students and upon the host communities. In February 2016, RRForum formed a strategic alliance with ITGA to develop an Alcohol Responsibility Program (“ARP”) that could be employed in college communities to enhance the responsible sale, service and use of beverage alcohol and compliance with the alcohol sales laws.

RRForum and ITGA issued an RFP to ITGA member communities in June 2016 to participate in a pilot project to promote responsible alcohol sales, service and use in college and university communities. The pilot project had three objectives:

- I. Develop a comprehensive Alcohol Responsibility Program that assists all alcohol beverage licensees in complying with alcohol sales laws prohibiting sales and service to underage and intoxicated individuals.

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- II. Identify unique implementation challenges in communities with large student populations and the unique opportunities in serving mature town and gown coalitions.

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- III. Identify additional areas of concern and potential programmatic activities that could be incorporated into the ARP model.

Eighteen ITGA member communities submitted applications describing their town and gown coalitions and their unique problems and past experiences with alcohol issues. Of these, six that reflected a range of college communities were selected for the project:

- California Polytechnic State University / San Luis Obispo / Cuesta College, CA
- University of Colorado / Boulder, CO
- Miami University / Oxford, OH

- Oklahoma State University / Stillwater, OK
- Oregon State University / Corvallis, OR
- University of Massachusetts / Amherst, MA

In each community, a steering committee consisting of college and town public health, safety and hospitality stakeholders and other community leaders helped adapt the RRForum model to local laws and preferences. The pilot project was conducted between September 2016 and January, 2018.

## II. Implementation and Outcomes

**Objective #1: Develop a comprehensive Alcohol Responsibility Program that assists all alcohol beverage licensees in complying with the alcohol sales laws and promotes Responsible Retailing practices.**

The ARP is a community-based model that engages individual alcohol beverage licensees within the context of a community-wide responsible retailing system. The ARP combines four strategies for enhanced responsible retailing that were developed by RRForum under research awards from the National Institutes of Health<sup>1,2</sup> and the U.S. Department of Justice<sup>3</sup> for achieving compliance with the alcohol sales laws.

### Strategy #1 Underage Sales Prevention

*Reducing access to commercial sources of beverage alcohol for those under age 21 is central to an overall strategy for reducing the societal and personal costs of underage drinking. Reducing underage sales has been recommended by the Institute of Medicine report, *Reducing Underage Drinking: A Collective Responsibility*<sup>4</sup>, the Federal Trade Commission's Report to Congress, *Alcohol Marketing and Advertising*<sup>5</sup>, and the U.S. Surgeon General's Call to Action<sup>6</sup>.*

*Over the past 12 years, RRForum has validated a strategy to improve age-verification and underage sales refusal that is based upon periodic feedback to alcohol beverage licensees on actual staff ID-checking conduct. Each quarter, mystery shoppers who are of*

<sup>1</sup> NIAAA award 5R44AA021593-03

<sup>2</sup> NIAAA award R44 AA024992-02

<sup>3</sup> 2012-AH-FX-4004

<sup>4</sup> Institute of Medicine and National Research Council. (2003). *Reducing Underage Drinking: A Collective Responsibility*. Committee on Developing a Strategy to Reduce and Prevent Underage Drinking, Richard J. Bonnie and Mary Ellen O'Connell, Editors. Board on Children, Youth and Families, Division of Behavioral and Social Sciences and Education. Washington, D.C.: The National Academies Press.

<sup>5</sup> Federal Trade Commission. Report to Congress: Alcohol Marketing and Advertising, 2003.

<sup>6</sup> U.S. Department of Health and Human Services. The Surgeon General's Call to Action to Prevent and Reduce Underage Drinking. US Department of Health and Human Services, Office of the Surgeon General. 2007.

*legal age – but young enough (age 21–25) to trigger an ID check – ask to buy or be served an alcoholic beverage. If a clerk, server or bartender requests an ID, the mystery shopper presents the staff member with a green card, explaining the purpose of the visit and congratulating staff on verifying age. If staff was prepared to sell or serve alcohol without first requesting an ID, the mystery shopper presents a red card, explaining the purpose of the visit and warning staff of the consequences had this been a law enforcement compliance check. Owners/operators receive written follow-up reports.*

Because the mystery shoppers are of legal age, no harm or risk is involved for staff or the establishment, even if no ID check is performed. Individual results are nevertheless kept confidential. Since mystery shop reports are also “teachable moments,” RRForum includes information on responsible retailing Best Practices when it distributes the mystery shop reports. A four-state, 16-community study of this model by the Prevention Research Center / PIRE found that mystery shop feedback and Responsible Retailing resources were associated with a two-fold increase in the odds of checking IDs,  $OR = 2.05, p < .001$ .

The following table shows the results of ID-checking mystery shops in the pilot communities.

| <b>Community</b>       | <b>1st MS</b> | <b>2nd MS</b>     | <b>3rd MS</b> | <b>4th MS</b> |
|------------------------|---------------|-------------------|---------------|---------------|
| <b>Amherst</b>         | Dec 16-Jan 17 | March-17          | Oct. 2017     | Dec. 2017     |
|                        | 100%          | 62%               | 90%           | 65%           |
| <b>Boulder</b>         | Dec 16-Jan 17 | Jan-17            | Aug-17        |               |
|                        | 100%          | 100%              | 96%           |               |
| <b>Corvallis</b>       | March - 17    | May -17           | Oct-17        | Jan-18        |
|                        | 92%           | 64%               | 85%           | 90%           |
| <b>Oxford</b>          | Feb-17        | Apr-17            | Aug-17        | Nov-17        |
|                        | 95%           | 100%              | 83%           | 86%           |
| <b>San Luis Obispo</b> | Jan-17        | May-17            | Sep-17        | Nov-17        |
|                        | 93%           | 93%               | 89%           | 79%           |
| <b>Stillwater</b>      | Mar-17        | Apr-17*           | Sep-17        | Dec-17        |
|                        | 92%           | FAKE ID SHOPS 16% | 82%           | 76%           |

\*This inspection involved a different protocol, discussed below in Section III.

## Strategy #2 Over-service Prevention

*College students drink more frequently and more heavily than other young adults and drinking in college on-premises establishments has been associated with heavy consumption<sup>7,8,9</sup> and a range of problems including assault, fighting, risky sex, and drinking and driving<sup>10,11,12</sup>. Servers and bartenders are an important first line of prevention for reducing over-service to patrons as well as the incidence of DWI.*

The College ARP engages bars and restaurants on the importance of cutting off service to impaired customers (“over-service”) in an approach similar to underage sales prevention. “Pseudo-Intoxicated” Mystery Shoppers (P-IMS) visit bars, clubs and restaurants with a large volume of alcohol service. These trained actors ask to be served a beverage while exhibiting obvious signs of intoxication that staff would regularly encounter: slurred speech, imbalance, loss of concentration and confusion, etc. If the staff member declines to sell or serve alcohol, the P-IMS would repeat the request (e.g., “What, you won’t serve me?”); but after refusal is reaffirmed, the P-IMS accepts the decision (“Well, you’re probably right”) and departs. If the staff member, however, was willing to serve a beverage, the actors “discover” a text message (e.g., to meet a friend) and depart before being served. Confidential written reports to owner-operators and managers describe the results. All serving establishments, whether visited or not, receive a report of aggregate over-service rates in the community and a link to our website for a brief video that shows how the P-IMS behaved during their inspections and demonstrates over-service refusal skills for staff.

RRForum conducted two rounds of P-IMS inspections. The first, in fall 2016, was to validate the need for addressing over-service in college communities under RRForum’s award from the National Institute on Alcohol Abuse and Alcoholism. No reports were given to individual licensees and no aggregate report of prevalence was published. A second round of P-IMS was conducted in late 2017 – early 2018. These inspections were followed by confidential reports to licensees with their individual results. Aggregate reports of over-service rates, and links to our

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<sup>7</sup> JD Clapp, MR Holmes, MC Reed, AM Shillington, B Freisthler & JE Lange. Measuring college students' alcohol consumption in natural drinking environments: field methodologies for bars and parties. *Eval Rev*, 31(5), 469-489, 2007. doi: 10.1177/0193841x07303582

<sup>8</sup> JD Clapp, MB Reed, MR Holmes, JE Lange & RB Voas, RB. Drunk in public, drunk in private: the relationship between college students, drinking environments and alcohol consumption. *Am J Drug Alcohol Abuse*, 32(2), 275-285, 2006. doi: 10.1080/00952990500481205

<sup>9</sup> DL Thombs, R O'Mara, AL Tobler, AC Wagenaar, & JD Clapp. Relationships between drinking onset, alcohol use intensity, and nighttime risk behaviors in a college bar district. *Am J Drug Alcohol Abuse*, 35(6), 421-428, 2009.

<sup>10</sup> MM Bersamin, MJ Paschall, RF Saltz & BL Zamboanga. Young adults and casual sex: the relevance of college drinking settings. *J Sex Res*, 49(2-3), 274-281, 2012.

<sup>11</sup> C Cotti, RA Dunn & N Tefft. Alcohol-impaired motor vehicle crash risk and the location of alcohol purchase. *Soc Sci Med*, 108, 201-209, 2004.

<sup>12</sup> T Huckle, P Gruenewald & WR Ponicki. Context-Specific Drinking Risks Among Young People. *Alcohol Clin Exp Res*, 40(5), 1129-1135, 2006.

S-STOP™ (Stop Service to Obviously - impaired Patrons) website for training in over-service prevention, were sent to all licensees in the communities.

*FALL 2016*

| <b>Community</b>       | <b># Shops</b> | <b># Served</b> | <b># Refused</b> | <b>% Refused</b> |
|------------------------|----------------|-----------------|------------------|------------------|
| Amherst, MA            | 13             | 12              | 1                | 7.70%            |
| Boulder, CO            | 13             | 12              | 1                | 7.70%            |
| Milwaukee, WI          | 13             | 13              | 0                | 0.00%            |
| Stillwater, OK         | 13             | 9               | 4                | 30.80%           |
| <b>TOTAL FALL 2016</b> | <b>52</b>      | <b>46</b>       | <b>6</b>         | <b>11.50%</b>    |

*FALL 2017 – WINTER 2018*

| <b>Community</b>                     | <b># Shops</b> | <b># Served</b> | <b># Refused</b> | <b>% Refused</b> |
|--------------------------------------|----------------|-----------------|------------------|------------------|
| Amherst, MA                          | 14             | 12              | 2                | 14.30%           |
| Boulder, CO                          | 13             | 8               | 5                | 38%              |
| Corvallis, OR                        | 16             | 13              | 3                | 19%              |
| <b>TOTAL FALL 2017 - WINTER 2018</b> | <b>43</b>      | <b>33</b>       | <b>10</b>        | <b>23%</b>       |

**Strategy #3 Developing Community Responsible Retailing Resources**

Neither state alcohol regulations nor local laws stipulate what actions licensees should take after they refuse sales or service to a customer who is underage or obviously impaired. *What should staff do with an ID they suspect is fake ID? What should staff do when they suspect that an adult who purchased alcohol is furnishing it to someone under age 21 (a "3<sup>rd</sup>-party sale")? What safe ride home services are available for a patron who may be impaired? When and how should law enforcement be contacted?*

Each pilot site was asked to develop a guidance for licensees with information and recommendations regarding specific steps that licensees and their staff might take when these problems arise. These guidance documents for each community (except Boulder and Amherst, whose steering committees did not complete the guidance) are included in the appendix.

**Strategy #4 Enhanced communication and collaboration among public – private stakeholders**

Collaboration among public – private stakeholders contributes to alcohol responsibility. Each College ARP is advised by a steering committee representing public health and safety stake-

holders for the town and higher education institution. Alcohol licensees, and their beer and wine-spirits distributors, also live and work in college communities and are important stakeholders in the ARP.

Reports on aggregate community ID-checking rates were distributed to all licensees, and to community stakeholders, along with Best Practices resources. In Amherst, the ARP used the reports as a way to also communicate with retailers about discounted serving trainings being held in the area in the fall of 2017 and to invite alcohol retailers to a forum being held in the spring of 2018. In Corvallis, the local radio stations picked up on the Corvallis ARP press release and got the word out about the program and the importance of responsible retailing in college communities.

### III. Discussion

#### Underage sales prevention

College communities are high alcohol law enforcement environments with high yearly staff turnover for licensees and also of customers. Local liquor stores and serving establishments typically receive periodic compliance checks for underage sales and for minors-in-possession. Only Boulder, however, showed consistently high ID-checking rates of  $\geq 90\%$ ; in the other five sites, rates were more varied, indicating that and ID-checking is not yet performed consistently in licensed establishments.

Many college-area bars have doormen to check IDs before entering (often, doormen were added as a result of earlier infractions of sales-to-minors and minors-in-possession laws). Since the RRForum mystery shopper protocol only determines whether an ID was requested, virtually all licensed establishment with a doorman passed their mystery shop inspections. But the use of doormen in bars, and the requesting of IDs, has not removed concerns that underage customers are drinking in these establishments, especially with the many state licensees shown by students.

In Stillwater, the ARP employed a protocol to test this concern. Two female legal-age mystery shoppers were provided with expired licensees that had been confiscated by the Stillwater Police Dept. In eight inspections of liquor stores, clerks in only two stores recognized that the license was expired and refused to sell. In the 17 inspected bars and restaurants, staff in only two establishments recognized that the license was expired and refused to serve. In the four instances in which sales / service was refused, neither the two liquor store clerks nor the two waitstaff who recognized that the license was expired also recognized that the license did not belong to the customer who presented the ID.

Many college students have obtained fake IDs to allow them access to drinking establishments. Some IDs are very sophisticated, embedded with coded date-of-birth data corresponding to the date-of-birth on the front of the ID: a careful visual inspection of the ID, or even many ID-

readers, would show the ID to be authentic and the bearer to be of legal age. In Oxford, the ARP has scheduled the use of sophisticated electronic ID-scanners in spring 2018.

## Over-Service Prevention

The Pseudo-Intoxicated Mystery Shop (P-IMS) inspections showed the high rates of over-service found in the research literature. The first round of P-IMS showed that bartenders and wait staff were willing to serve alcohol to an obviously-impaired patron in 88% of the inspections. (The degree of impairment exhibited by the P-IMS can be viewed at [www.S-STOP.org](http://www.S-STOP.org).) A second round showed an over-service rate of 77%. The Steering Committees generally expected that over-service might be high and these results clearly indicate that over-service in licensed establishments in these town & gown communities is a pervasive problem. If periodic P-IMS inspections with feedback to licensees on actual staff conduct improves over-service recognition and refusal – which the current field effectiveness trial in 20 town & gown communities is validating – S-STOP™ will be an important element of the ARP.

## Objective #2: Identify unique implementation challenges in communities with large student populations and the opportunities in serving mature town & gown coalitions

RRForum staff visited each of the six pilot sites to meet with the steering committees and with the larger community town & gown coalitions to present the goals of the ARP. These town & gown coalitions, as evidenced by the proposals, were mature and included public health and safety staff from both the educational institutions and the local government as well as business and hospitality stakeholders.

Prior to the pilot project, a June 2016 meeting of RRForum's advisory board recommended that each individual ARP community be given wide discretion in adapting the model to the laws and concerns of that community. This proved logistically challenging because decision-making involved entire coalitions. But it also showed the unique opportunity when the "client" is the town & gown community itself. The use of expired IDs to detect whether doormen and staff are *inspecting* (as opposed to merely *asking for*) IDs could otherwise never be conducted without the participation of Stillwater police and the Oklahoma ABLE Commission. In Oklahoma and Colorado, changes in alcohol laws would permit many additional retailers to sell full-strength beers and the ARPs mystery shop program for ID checks was modified to include these new retailers. (Objective 3, below, discusses these opportunities further.)

RRForum also conducted focus groups and interviews with licensees in four of the pilot sites to further examine licensee concerns and issues relating to alcohol responsibility in their communities. The participants agreed that ID-checking was already ingrained in staff awareness due to frequent compliance checks. Alcohol over-service continues to be a problem. The participants cited several issues that make it harder to monitor patrons in a college town. A few noted how hard it is to know whether someone is "truly drunk" or merely "excited" when they come in, and that it is easier to detect impairment when a customer has been at the establishment for a while. Others cited the problem that students "pre-game" (preload) beforehand, which means that customers may look fine when they come in but in short order become impaired. Another

difficulty was that some patrons sit quietly without displaying any obvious signs of impairment. In one community, participants complained about nearby stores selling “nips” (small bottles of alcohol) for only \$1 that patrons sneak into their establishment.

Most participants thought that having pseudo-intoxicated actors check staff conduct was a good idea, especially to check on staff with fewer years on the job. Many establishments in college towns post a staff member at the entrance to check IDs and turn away patrons who appear to be impaired, in which case the visits could be adapted to check both doormen and server behavior. Concerns about drunk driving, however, have been reduced due to the availability of Uber, which was seen as a better way to reduce drunk driving than a designated driver.

As noted, college communities are typically high alcohol law enforcement environments. Because the deterrent effect of a compliance check is short lived – a compliance check will impact the *future behavior* of clerks and servers for only a brief period – compliance checks may be repeated throughout the year. One unintended consequence of enhanced enforcement, however, is that some licensees wonder why, after repeatedly passing compliance checks, they continue to be inspected with such frequency. Licensees that are cited for violations may feel that the actions of local police or licensing commissions may be overly aggressive and harsh. What can emerge is a fraught relationship between public agencies and parts of the licensee community. This strained relationship between licensees and public agencies was apparent in one of the pilot sites. In a second, licensees reported that participation in the ARP could improve community relations. But in other sites, licensees reported a very positive relationship with law enforcement and other community stakeholders.

### Objective #3: Identify additional areas of concern and programmatic activities that could be incorporated into the ARP model

The principal content of the ARP is currently directed towards alcohol beverage sales and service and measures to enhance responsible retailing. The Steering Committees and the larger town and gown coalitions, however, are clearly impacted by other alcohol-related issues unconnected to licensed establishments that greatly impact their communities.

### Game Day

Major sporting events are associated with heavy alcohol consumption. A presentation at the April 2017 RRForum conference, repeated in modified form at the June 2017 ITGA conference, addressed how the implementation of responsible retailing training and practices can reduce alcohol incidents, even when beer sales are (re-)introduced in many major college stadia. The use of Game Day Best Practices for alcohol sales, use and enforcement in stadia, including the adjoining parking areas (“the breeding grounds of bad behavior”), would be a useful addition to the ARP.



## Sexual violence

The incidence of sexual assault is particularly high on college campuses, with 12-38% reported sexual assault since entering college.<sup>13</sup> In licensed establishments, staff could also play a role in reducing sexual violence. RRForum is hoping to develop BARS Recognizing Sexual Violence for Prevention (BARS RSVP), a short training video in recognizing and intervening in situations involving sexual harassment or potential sexual assault and responding to patrons who seek assistance for themselves or for other customers.

(In Oxford, the ARP offered free sexual assault / harassment intervention training to alcohol licensees through a national program that trains bar staff to recognize and respond to situation that could be link to sexual and interpersonal violence.)

## Public Policy and Responsible Retailing

The ARP focuses upon retailers and on-premises serving establishments in order to assist these licensees to comply with the alcohol sales laws. An additional means of addressing the performance of licensees, and of increasing the uptake of responsible retailing best practices, is through policies and practices adopted by the city or town. For example, the use of electronic age-verification scanners has been increased in some jurisdictions by granting an *affirmative defense* for licensees who employ such a device. Some communities have afforded benefits to licensees (like extended hours of operation, or free sampling) that have conducted training or have no alcohol sales violations over a prior period of years. RRForum has developed a deferred prosecution program for the City of Milwaukee that allows licensees to void a citation by passing a series of mystery shops. (An examination of how communities and states have increased the uptake of responsible retailing can be found in [Public Policy and Responsible Retailing](#).) A relationship between RRForum and the town & gown community must first be developed before an ARP becomes a platform for public policy.

## IV. Sustainability

Two additional questions addressed during the ARP pilot program were: What would be the cost for operating an ARP? How can funding for the ARP be achieved?

### Cost model

The cost of an ARP consists of direct field expenses, most of which are for mystery shop inspections, and program administration. The cost of the mystery shop program is related to the number of licensees. But in smaller communities, most or all of the licensees will receive multi-

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<sup>13</sup> C. Krebs, C Lindquist, M Berzofsky, B Shook-Sa, K Peterson, M Planty, J Stroop. (2016). Campus climate survey validation study final technical report. *Bureau of Justice Statistics Research and Development Series*.

ple visits; and in larger communities, only a percentage of licensees are visited in any round of mystery shops. As a result, the mystery shop expenses may not vary greatly among communities. The cost of 100 ID-checking mystery shops (@ \$50) would be \$5,000. Pseudo-intoxicated mystery shops of bars and restaurants would be \$1,500 - \$2,500. Management for the program would be \$2,500. So the cost of a comprehensive ARP would +/- \$10,000 a year.

## Funding mechanisms

RRForum has conducted community alcohol responsibility programs in behalf of prevention agencies, regulators, city agencies, and alcohol distributors and their suppliers. Cities and colleges have typically not addressed alcohol responsibility programs in their budgets; but steering committee members in several of the pilot sites indicated that funds could be sought within the institutions, or through supplemental and grant funding, but that a long lead time would be needed to obtain such funds.