LAST Call

for

High-Risk Bar Promotions That Target College Students

A Community Action Guide

Debra F. Erenberg and George A. Hacker

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PREFACE

Recently, the Harvard School of Public Health College Alcohol Study examined the nature and scope of heavy episodic alcohol use among a national sample of American college students and the problems it engenders for binge drinkers and others on campus. In a representative sample of 140 colleges and over 17,000 students, we found that most college students drink alcohol (84%) and that half of these drinkers (44% of the total student population) are binge drinkers who consume five or more drinks in one sitting. In fact, one out of five (19%) students binges more than once a week.

Binge drinking is not evenly distributed across all student groups. Some, like fraternity and sorority members and students involved in athletics, are more often binge drinkers. Nor is it distributed evenly at all colleges. Indeed, binge drinking ranges from 1% of students at the college with the lowest rate to 70% at the highest. Colleges with dormitories, with NCAA Division I athletic teams and with alcohol outlets within one mile of campus have higher binge-drinking rates.

Binge drinking has many consequences, some quite serious. We found that binge drinkers hurt themselves through lost educational opportunities, antisocial or illegal behavior, high-risk sexual practices or physical injuries. They hurt others through physical assaults, sexual harassment or disturbing the peace.

The desire to drink heavily and the ability to obtain alcohol develops long before students arrive at college. Half of college binge drinkers also binged in high school. They came to college expecting to continue drinking heavily. In fact, at campuses with a high rate of binge drinking, incoming freshmen who binge do so within the first week of arrival. Every one of nearly 1,000 freshmen in a special study at 13 colleges reported that alcohol was very easy to obtain. All were 18 or younger. So much for the enforcement of minimum drinking age laws!

The problems produced by binge drinking are college and community problems, and the solutions must stem from joint efforts. Heavy episodic drinking is a product of many factors, but the critical ingredient is a supply of cheap alcohol in large volume, often available to underage drinkers. Bar owners in many college communities supply that ingredient, advertising special deals that encourage students to drink heavily every night of the week. Those ads contribute to students' perception that binge drinking is the norm and encourage individual students to increase their consumption to keep up with their peers.

That is why this guide is particularly valuable. It addresses the ways community groups can work to reduce this high-volume/low-cost supply that is so conducive to heavy drinking. It provides a range of strategies to curtail high-risk marketing practices, reduce the pressure on students to binge and alleviate the problems that heavy drinking creates.

Colleges cannot tackle this problem alone. Those that try to reduce student drinking without community support simply may move the site of alcohol abuse off campus. Only with community involvement can real progress be achieved.

Henry Wechsler, Ph.D.
Principal Investigator
Harvard School of Public Health
College Alcohol Study

Many people consider drinking a normal and integral part of the college experience. Despite this expectation, researchers from the Harvard University School of Public Health made headlines in 1994-95 when their nationwide survey revealed that almost half of all college students "binge drink" (five or more drinks in a row for men, four or more for women). The survey found heavy-drinking students more likely to suffer from a variety of health and academic consequences. Even students who don't drink heavily suffer second-hand effects from their fellow students' binging, including interrupted sleep or studying, property damage, and sexual or other assaults.

On and around campus, students see a variety of messages about drinking. Most campuses now offer "prevention" and "alcohol awareness" programs, but those programs compete for student attention with happy hours, keg parties and bar crawls. Wellness campaigns are too often lost in an environment that, on the whole, supports heavy drinking.

Although heavy student drinking has remained constant, the campus environment has changed noticeably since the early 1980s. Brewing companies, once highly visible at many campus events and activities, now maintain a more subtle presence. Beer ads no longer dominate student newspapers. In their absence, local bars have increased their advertising. Some advertise drink specials and other promotions that encourage students to drink excessively. Examples of common high-risk marketing practices include all-you-can drink specials, "twofers," "coin nights," ladies nights, "bladder busts" and bar crawls.

This guide was created to help members of college communities take action to create a healthier campus environment and ease the pressure on students to drink.

Chapter 1 considers drinking and its consequences, for college students and others in the community.

Chapter 2 examines alcohol marketing and promotional practices on campus and in campus media. It also discusses strategies to reduce irresponsible marketing and service practices at bars frequented by students.

Chapter 3 looks at laws and policies that restrict alcohol advertising on college campuses.

Chapter 4 discusses laws designed to limit high-risk promotions.

Chapter 5 presents community-based approaches to reducing problems associated with heavy drinking at area bars.

Chapter 6 puts all the pieces together, offering tips for organizing a coalition, gathering information, developing a strategic plan, and taking action to change bar marketing and service practices.

Who should use this guide?

This guide is for anyone who lives on or near a college campus and wants to defend students and other community members from irresponsible marketing practices that encourage heavy drinking. Whether you are a college administrator, student, parent, public health professional, member of a community coalition or a neighbor who has grown tired of late-night noise and vandalism, this manual provides the tools you need to combat the marketing practices that invite students to binge.

As you read, we encourage you to consider strategies that might work where you live. Share this guide with others as you're getting started, and refer to it as you develop and implement a strategic plan.

A note about terminology

Throughout this guide, the terms "college" and "university" are used interchangeably. Although most of the studies we cite focus on four-year institutions, the strategies we present apply to any college community. Two-year, commuter colleges will, of course, face different challenges than four-year, residential institutions. In the final chapter, we suggest steps for tailoring a strategic plan to meet the specific needs of your community.

We use the terms "liquor control board," "alcoholic-beverage control board," or "ABC" to refer to the state entity that enforces laws governing the sale and promotion of alcohol. In some states, authority over establishments that sell alcoholic-beverages rests with a single state entity. In others, the state shares enforcement and licensing authority with local agencies.

Problem? What Problem? —
Some Basic Facts About the Drinking Culture

Take a Sunday morning stroll around many college campuses and you're likely to encounter the wreckage of the previous evening's partying. Keep an eye out for broken bottles as you make your way toward the dorms. Notice the scattered plastic cups and beer cans that mark the path and the bleary-eyed coeds making the "walk of shame" home from an unplanned sexual encounter. A banner announcing the upcoming book sale may have fallen under the weight of some would-be Tarzan, but the nearby kiosk still bears brightly colored fliers proclaiming next week's drink specials — $1 pitchers at the Black Horse Tavern tomorrow, quarter shots on Tuesday!

If you live near a college campus or work or study on one, you know that alcohol often permeates the environment. Alcohol-related social and recreational opportunities typify the university experience: wine-and-cheese gatherings with the faculty, tailgate parties before the big game, and happy-hour bonding with classmates. Less often acknowledged is how drinking interferes with the academic character of the campus, the tranquility of neighborhoods, and the health and safety of the entire community.

Too often, we take alcohol use for granted, even among underage students. On too many campuses, drinking has become a big joke, and alcohol problems, which plague drinkers and non-drinkers alike, have been tolerated as the natural fallout of an important rite of passage.

Student drinking, particularly the heavy drinking in which so many engage, is no joke. It drains the resources of colleges and communities and sacrifices the vast potential that students bring to academia.

The big picture: How much do students really drink?

In a survey of students at 140 colleges by researchers from the Harvard University School of Public Health, 44% reported binge drinking (five or more drinks in a row for men, four or more for women during the past two weeks). Half of all males binged, compared with 39% of females. The study classified 19% of all students as "frequent binge drinkers" who binge three or more times in two weeks (23% of men and 17% of women). Binge-drinking rates at different schools ranged from 1% to 70%. At almost one-third of the colleges surveyed, more than half of students reported binge drinking.[1]

Although women drink less than men on average, they are catching up. The number of college women who drink to get drunk has increased from 10% to 35% in the past 10 years.[2]

Students who live in a fraternity or sorority house are the heaviest drinkers by far. Eighty-six percent of fraternity residents and 80% of sorority residents report binge drinking.[3]

Is Drinking a Laughing Matter?

Student humor about drinking contrasts sharply with the reality of alcohol-related problems on campus. The following list has been circulating among colleges via e-mail, adding new "jokes" as it goes.

Signs you have a drinking problem:

- *The glass keeps missing your mouth!*
- *You have to hold onto the lawn to keep from falling off the earth!*
- *Hi ocifer. I'm not under the affluence of incohol.*
- *You think the Four Basic Food Groups are Caffeine, Nicotine, Alcohol, and Women.*
- *Your doctor finds traces of blood in your alcohol stream!*
- *The parking lot seems to have moved while you were in the bar!*
- *You've fallen and you can't get up!*
- *BeerTender! Get me another Bar!*
- *School interfering with your drinking.*
- *The shrubbery's drunk too, from frequent watering.*
- *When hangovers become an attractive alternative lifestyle — please pass the ice pack!*

Most kids learn to drink during their high school years. After graduation, when they begin living away from home (and have more friends who live on their own), their consumption increases. In general, the heaviest drinking occurs between the ages of 18 and 24. College students of that age are more likely to drink, and to drink heavily, than their peers who do not attend college.[4]

The Harms of Heavy Drinking

Almost half of frequent-binging students have experienced five or more of these problems since the beginning of the school year as a result of their drinking:

- required medical treatment for alcohol overdose
- engaged in unplanned or unprotected sexual activity
- got hurt or injured
- damaged property
- got into trouble with campus or local police
- forgot where they were or what they did
- got behind in school work
- did something they regret
- missed a class
- argued with friends.

Source: H. Wechsler, et al., "Health & Behavioral Consequences of Binge Drinking in College," *JAMA*, Vol. 272, No. 21 (Dec. 1994).

Consequences for drinkers

The consequences of binge drinking go far beyond hangovers, which many students wear as a badge of honor identifying them as "party animals." According to the Harvard study, students who binge frequently experience many more drinking-related problems than those who do not binge or who binge less often.

Despite the consequences, frequent binge drinkers do not generally perceive themselves as having a "drinking problem." Binge drinking and its associated hazards have become so interwoven into college life that students, friends, residence advisors and faculty can easily miss early signs that a student may need help controlling his or her drinking.

As students drink more heavily, their academic achievement, on average, declines. Grade-point averages (GPAs) fall as students' number of drinks per week rises.[5] Alcohol is a factor in more than a third of all academic problems and more than a quarter of all dropouts.[6]

Here's to your health?

When they drink heavily, students place themselves at greater risk of a variety of health and safety crises. At the University of Richmond, for example, 24% of students had injured themselves as a result of excessive drinking. Thirteen percent of those surveyed reported having been exploited sexually after having too much to drink, and 5% admitted to having taken advantage of a drunk person.[7] More than 29% of University of Iowa undergraduates reported engaging in "unplanned" sexual activity during or after drinking at least once in the previous year.[8] A study of students at Vanderbilt University found that acute alcohol intoxication requiring emergency room treatment was common, particularly among freshmen. About a fifth of students treated for intoxication had also suffered an injury related to a fall.[9]

One for the road

Despite the proliferation of "Friends don't let friends drive drunk" messages on most campuses, students continue to drink and drive, and they get away with it. Although more than one-third of students surveyed by Southern Illinois University's Core Institute reported driving while intoxicated during the past year, only 1.4% were arrested for driving under the influence.[10] Drivers 21 to 24 years old involved in fatal crashes are more likely to have alcohol in their systems and more likely to have a blood-alcohol content above 0.10 (the legal limit in most states) than those in any other age group.[11]

Other alcohol-related crime

When students drink heavily, the likelihood that they will commit or fall victim to a crime increases. Colleges reported nearly 10,000 violent crimes on campus in 1994, including 20 murders.[12] In one-half to two-thirds of campus homicides and serious assaults, alcohol is present in the offender,

the victim or both.[13] According to one study, 90% of all reported campus rapes occurred when alcohol was used by the assailant or the victim.[14]

Drinking or possessing alcohol is itself a crime for a substantial proportion of students. In 1994, there were more than 20,000 arrests for liquor law violations on campus (1.4 for every 1,000 students). Arrests for liquor law violations amount to about three times the number of arrests for illicit drugs.[15]

Student vandalism, including trashing dormitories, stealing property and writing graffiti, goes hand-in-hand with heavy drinking. A study of 12,651 college students conducted by the Towson University (Md.) Campus Violence Prevention Center found that more than 60% of students who destroyed or damaged property on campuses reported they were drunk at the time.[16] In a survey of students from 68 colleges and universities, one in 10 admitted to an act of vandalism under the influence of alcohol in the past year. Nearly one-quarter of heavy-drinking students had engaged in vandalism.[17]

Many residents of college communities have grown tired of the crime and petty annoyances that flow from the bars that cluster around campus. Complaints of late-night noise, public urination and littering are common. While these problems have a regular impact on neighbors' quality of life, periodic short-term disturbances (or riots) can cause far greater damage. In October 1996, for example, the mayor of Cedar Falls, Iowa, ordered bars along the "strip" adjacent to the University of Northern Iowa to close early after they became overcrowded with drunken revelers from the homecoming football game. Intoxicated students responded by throwing bricks, overturning cars and causing serious damage to nearby property and businesses.

"Second-hand" effects

The effects of heavy drinking are widespread and not limited to vandalism and noise. Two-thirds of students responding to the Harvard survey reported experiencing at least one adverse consequence of another student's drinking during the school year. On campuses where a majority of students binge, students who don't drink heavily are almost four times more likely to experience one of those problems than their counterparts on campuses where binging students are in the minority.[18]

"Second-Hand" Effects of Other Students' Drinking

College students reported experiencing the following problems due to other students' drinking:

- 44% had to "babysit" an intoxicated student;
- 43% had sleep or study interrupted;
- 27% had been insulted or humiliated;
- 22% had a serious argument;
- 21% had experienced an unwanted sexual advance;
- 13% had been pushed, hit or assaulted;
- 12% had property damaged;
- 2% had been the victim of a sexual assault or "date rape."

Source: H. Wechsler, et al., "The Adverse Impact of Heavy Episodic Drinkers on Other College Students," *Journal of Studies on Alcohol*, v. 56, n. 6, p. 628, November 1995.

Gimme shelter!

Like other exhausted and exasperated members of the community, students have grown less tolerant of the late-night noise, vandalism, disorderly behavior and other problems that occur when their peers drink heavily. Peer education programs, alcohol-free activities and university policies that reduce the presence of alcohol on campus have all gained popularity over the past decade. When asked whether they would prefer to have alcohol available and used at social events on and around campus, one-third of students said they would prefer alcohol not be available.[19] Two-thirds of students who do not binge would prefer to live in an alcohol-free campus environment.[20]

The increasing demand for substance-free housing illustrates student willingness to give up some convenience (being able to drink in their rooms) in exchange for a safe and quiet place to live and study. Initially, university officials who considered offering

"Substance-free residence halls work great at connecting and supporting the non-users."
— Andy Hill, Health Educator, Old Dominion University

this housing option thought students would select it only under pressure from parents. To the surprise of many, most students make this choice on their own, and both drinkers and abstainers enjoy this living arrangement.

At schools that offer substance-free housing, the number of students choosing this option continues to grow. At the University of Michigan, 2,400 students (one-third of those living in University housing) opted for substance-free dorms in 1996, up from 500 when the program began in 1989. At the University of Maryland, one-eighth of on-campus residents chose substance-free dorms in that program's third year,[21] and the program's popularity has since grown.

Substance-free housing has the added benefit of reducing vandalism. Western Washington University in Bellingham turned the first two floors of the dorm with the worst reputation for vandalism into a drug-free living area. Although it is the residence hall closest to the downtown bars, vandalism costs declined from several thousand dollars a year to only $60. Vandalism expenses at the school's other dorms have not declined.[22]

"The substance-free policy is great in terms of reducing wear and tear on the dorms."
— Dan Herbst, Washington University

Source: J. Epstein & P. Finn, Preventing Alcohol-Related Problems on Campus: Vandalism (1995).

Dangerous misperceptions

Although students may drink a lot compared with the general population, the actual amount pales in comparison to what they believe their fellow students consume. In general, students perceive their peers' drinking levels to be higher than their own and higher than they actually are.[23] Exaggerated perceptions of others' drinking causes some students to increase their own consumption in order to "keep up."[24] This relation between perception and behavior reflects how the normalization of drinking in the college environment may feed the binge-drinking epidemic.

Many factors in the campus environment conspire to convince students that they need to drink heavily to fit in. In addition to their own observations and reports from friends, students learn about drinking by taking cues from parents, older siblings, professors and college administrators. Campus media and the campus landscape may also emphasize alcohol-related pursuits or alternative activities. It's easy to understand why students develop inflated perceptions of their fellow students' consumption if they routinely see messages that promote drinking — on their way to class, in the student paper, at sporting events and concerts, and in the residence halls and cafeterias.

Advertising and Marketing to the College Student

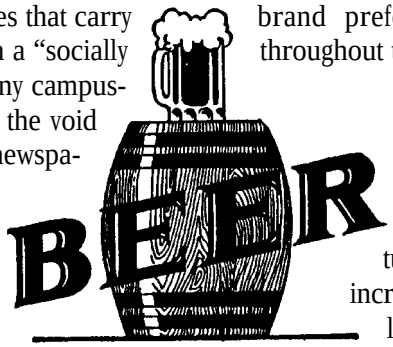
Saturday Coin Night: 9-11, Any Coin - Any Drink
— *The Rocky Mountain Collegian,* Colorado State University, March 8, 1996.

Thursday Free Beer, Pizza, and Kamikazes 'Til Midnight!
— *Northern Iowan,* University of Northern Iowa, March 12, 1996.

Ladies Drink Free All Night Long; $1 Shots Every Night After Midnight
— *Daily Reveille,* Louisiana State University, March 13, 1996.

Ease your mind before FINAL EXAMS with our "MIND ERASER" Drink Special
— *Auburn Plainsman,* Auburn University (AL), March 7, 1996.

On-campus marketing practices have changed over the past two decades. Unlike the 1980s, when brewers dominated the campus landscape, the most egregious alcohol ads today come from local bars. Under pressure from health advocates, parents and educators, brewers have toned down their campus marketing, focusing instead on "alcohol awareness" messages that carry their product logo along with a "socially responsible" tagline. On many campuses, however, bars have filled the void left by the brewers. Student newspapers, campus bulletin boards and kiosks are often plastered with ads proclaiming drink specials at nearby pubs.



Tuition, room, board . . . and beer

When they drink, students overwhelmingly choose beer. Each year, American college students quaff some 4 billion cans' worth, accounting for about 10% of total beer company sales.[1] That figure translates into approximately $1.37 billion in sales for Anheuser Busch and $429.7 million for Miller Brewing Company.[2]

For brewers, student drinking spells not just current sales, but future profits as well. Marketing research indicates that most people develop loyalty to a specific beer between the ages of 18 and 24.[3] College campuses, therefore, provide brewers with the opportunity to reach large numbers of "entry-level" drinkers at a time when they are developing brand preferences that may continue throughout their lives.

For families, who already pay 41% of their median income for tuition, room and board at a private institution,[4] the cost of education increases as students invest heavily in the consumption of alcohol. Each year, college students spend approximately $5.5 billion on alcoholic beverages ($446 per student) — more than they spend on soft drinks, tea, milk, juice, coffee and books combined.[5]

To secure a share of this lucrative market, brewers and other alcohol producers spend millions of dollars each year promoting their products to college students. One conservative estimate places annual alcoholic-beverage producer expenditures for college marketing between $15 million and $20 million.[6] That total does not include

marketing by local retailers and distributors, sponsorships, "alcohol awareness" messages, logo products, Spring Break promotions, advertisements in youth-oriented periodicals, or commercials on televised programs with a wide college audience. Because producers do not release this proprietary information and industry groups don't track advertising targeted at college students,[7] a better estimate of the value of these marketing tactics is not available.

Brewers go to college: On-campus marketing

UNC-Wilmington Seahawk, 9/18/96

Beginning in the 1970s, brewers maneuvered to increase their presence on college campuses and in other places where students gather. The major brewing companies and their local distributors hired students as "campus reps" to promote their brands. The Budweiser Clydesdale horses entertained crowds before football games, while the Bud Light Daredevils took the court to perform acrobatics during halftime at college basketball games. Inflatable beer cans sprouted on campus lawns and in front of fraternity houses. Brewers stormed Spring Break, dispatching squadrons of scantily clad marketing representatives to give away logo-emblazoned merchandise on the beach, at brewer-sponsored parties in local bars and at other student hot spots.

University Reporter (Wash., DC), 3/97

Many schools, including the University of North Carolina-Chapel Hill, have banned 'tailgate' parties in stadium parking lots because they increase drunkenness, injuries, fights, and other problems at sporting events.

Beer marketing targeted at college students waned after Congress passed legislation in 1984 encouraging states to adopt a minimum drinking age of 21. By 1987, all 50 states had adopted that standard. As a result, a large proportion of the undergraduate population now falls below the legal drinking age. By the late 1980s, challenges from public health activists, campus administrators, parents, community members, the media and government regulators peaked.

Facing negative publicity, potential legal liability, and increasing demands for university policies and government regulations to restrict access to students, brewers backed off — at least to the extent necessary to appease the critics. On-campus beer marketing has become noticeably less aggressive.[8] For example, brewers have all but discontinued the use of student reps to promote their brands on campus.[9]

The power of the press

College newspapers provide a powerful example of brewers' departure from campuses since the late 1980s. For students, the papers provide not just news, but also information about campus attitudes and priorities, as well as updates on social activities. Many cues about social norms come from advertisements that appear in the newspaper. On some campuses, a large proportion of those ads promote heavy drinking, giving the impression that this activity is an integral part of campus life.

About 35% of all college newspaper advertising revenue comes from alcohol ads.[10] In 1977-78 and again in 1984-85, researchers analyzed those advertisements in a representative sample of college newspapers.[11] The Center for Science in the Public Interest (CSPI) conducted a similar analysis in 1996.[12]

Average Column Inches: National (Brand) Ads per Issue[13]

Product:	1977/78	1984/85	1996
Alcohol	34.6	23.8	0.9
Books	1.4	1.3	1.2
Soft Drinks	1.2	0.5	0.4

Figure 1

Compared with the earlier studies, CSPI found brewers conspicuously absent from the pages of college newspapers. In 1984-85, ads for alcoholic-beverage products appeared in 21 out of 50 papers, and beer accounted for 97% of these ads. In 1996, only seven out of 75 papers carried alcohol product advertisements, and six of those were beer ads (the seventh was for hard cider).

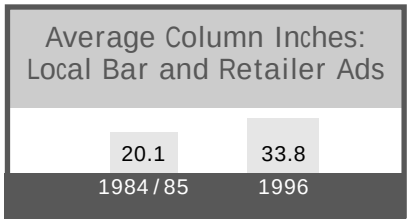


Figure 2

While beer ads have largely disappeared from the pages of college newspapers, promotions for local retailers, bars, taverns and distributors have grown. Since 1984, the average number of column inches devoted to advertising by local alcohol outlets has increased by more than half.

Irresponsible advertising

Some ads in college newspapers promote heavy drinking through pictures, phrases, or promotions. Among other pitches, they offer deeply discounted drinks (often in the middle of the week), use women as "bait" to attract male drinkers, announce price increases as the evening progresses ("ladder pricing" or "beat the clock" specials) or offer students all they can drink for a single low price.

Towson State Univ. (MD) Tower Light, 2/29/96

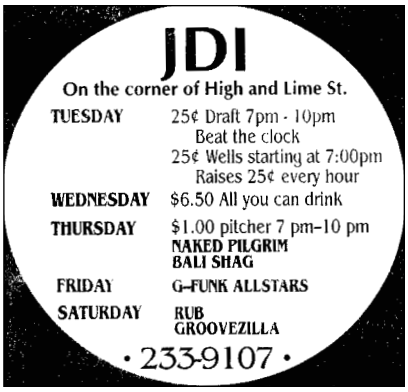
Such irresponsible marketing practices have a highly visible effect on the academic environment and on student safety. Whether they offer students "all-you-can-drink" or charge a penny for a pitcher of beer, bars suggest that students will continue to be served as long as they can stagger to the bar. "Beat the clock" specials, in which prices increase as the night progresses, draw students with the promise of cheap drinks, then increase the prices as their ability to gauge how much they are spending decreases. These and similar promotions demonstrate a disdain for responsible business practice and jeopardize the health and safety of the entire community.

Most irresponsible alcohol advertising in student papers comes from local bars. The few brewer ads that now appear generally avoid urging heavy drinking, relying instead on logos and images of the products to increase brand awareness.

In contrast, ads for local purveyors often blatantly encourage students to drink excessively. In 1996, one-third of the local alcohol ads we analyzed promoted heavy drinking. In 14 of the 61 papers that ran bar ads, more than half of that ad space was devoted to the promotion of heavy drinking. Often, the ads complement articles that glamorize or normalize heavy drinking. For example, columns reviewing nearby bars or describing a "night on the town" appear regularly in many college papers.

University Daily, Texas Tech. Univ., 3/13/96

"The ads say 'come and drink, and drink heavily.' Universities need to take action to preclude this kind of unconscionable marketing."
— Dr. Philip Meilman, Cornell University



University of Kentucky-Kernel, 3/7/96

"[D]rinking — often heavy drinking — is portrayed as the norm for college students."
— Breed, et al, "Alcohol Advertising in College Newspapers: A 7-Year Follow-Up," May 1990.

Other marketing on and around campus

Bars also rely on a variety of other marketing techniques to attract students. Bar promoters distribute handbills to students between classes, post fliers on campus kiosks and dormitory bulletin boards, and stuff student mailboxes with listings of the week's drink specials. Bars, liquor stores and brewers also reach students through free "unofficial" college publications, such as the *University Reporter*, that inform students of upcoming social events and contain numerous alcohol ads.

LSU Daily Reveille, 3/13/96

"Women are lured to bars through the promise of cheap drinks. Men, in turn, are lured by the implicit promise of access to women who are disinhibited by alcohol." — William DeJong, Higher Ed. Ctr. for Alc. & Other Drug Prevention

Some of the marketing practices used by bars to attract college students also promote unsafe drinking. Bars may ask popular students to serve as "guest bartenders" to attract more student business. "Guest bartenders" rarely, if ever, receive training in laws against serving intoxicated patrons, techniques for safely handling an unruly customer, ways to prevent drunk driving, or other strategies to safeguard the individuals they serve.

Sometimes promotions that encourage heavy drinking come disguised as safety programs. For example, some bars attract students by offering a ride home, sponsoring a "drunk bus" or other "safe-ride" program. Others may offer free non-alcoholic beverages to designated drivers. While such programs have the laudable aim of preventing drunk driving, they also encourage non-driving students to drink excessively by suggesting, implicitly, that "drinking responsibly" simply means not drinking and then driving.

Bar crawls, in particular, promote excessive and unsafe drinking. During the crawls, which often have a brand tie-in (usually Miller or Budweiser), participants travel to a number of bars within a few blocks of each other, consuming discounted drinks at each and becoming progressively more intoxicated. Because patrons drink over a period of several hours in different establishments, it is difficult, if not impossible, for servers to monitor drinking levels and slow or cut off service to drinkers who show signs of intoxication.

"National campaigns may encourage 'how people think' about alcohol, but local promotions and marketing impact 'how people drink.' "
— Rick Kozin, Nebraska Council to Prevent Alcohol & Drug Abuse (March 1995).

Increasingly, promoters dress up a full day's binging as a socially responsible activity by associating their bar crawls with a charitable organization. "Crawlers" bring canned food for a local shelter or soup kitchen, or a percentage of the proceeds may go to charity. These tie-ins allow participants to feel that they are helping the needy as they drink to abandon.

Targeting students off campus

For the distilled spirits industry, constrained by a Code of Good Practice that prohibits advertising in campus media, nearby bar promotions have become especially popular. For example, Jaegermeister, a 70-proof liqueur with herbal flavors, has done very little media advertising.[14] Instead, the company sponsors parties at college bars and deploys a 900-member marketing squad: the Jaegerettes. These young women in tight black dresses and high heels roam bars handing out hats, shirts and other prizes to

"It's probably a real cheap T-shirt, but just to have one is like an accomplishment — like you earned it."
— Louisiana State University freshman Michael Risey, *Wall Street Journal* (May 13, 1994).

customers who shout the Jaegermeister name or buy a "tooter" (a frozen test tube filled with a 5/8 ounce shot). Between parties and Jaegerettes, Jaegermeister spends approximately $7 million annually marketing to college students.[15]

Inspired by Jaegermeister's success, other distilled spirits producers have adopted similar tactics. According to a Jaegermeister representative, no fewer than 23 spirits brands have recently used attractive young women to promote their products in bars.[16] Most of these promotions persuade and teach students to drink shots of hard alcohol.

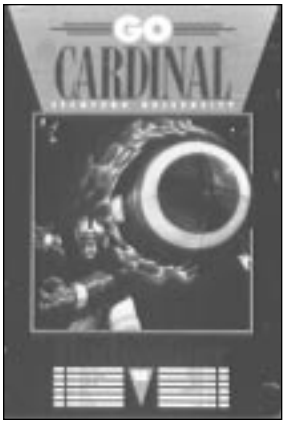
In addition to bars near campus, brewers continue to target Spring Break hot spots, such as Fort Lauderdale and Daytona Beach, Florida, and Lake Havasu, Arizona. Although not as aggressively as in the 1980s, brewers sponsor parties at bars frequented by vacationing students, giving away T-shirts and other items bearing company logos. Visitors to Budweiser's home page on the World Wide Web <http://budweiser.com> can choose from several popular Spring Break destinations and view pictures of bikini-clad students enjoying Budweiser products.

Music & sports sponsorship

Of all alcohol producers, brewers most actively sponsor rock concerts and sporting events to link their products with activities that young people associate with fun, excitement and sex appeal. Approximately three-fourths of the nation's major concert facilities have beer company sponsors, who pay between $100,000 and $500,000 annually to attach their names to concert venues and

"We hold about 20,000 to 30,000 parties a year. We teach the people how to drink Jaegermeister in bars, and it rubs off in stores."
— Sidney Frank, Chairman, Sidney Frank Importing Co., *Impact* (March 1 & 15, 1995)

University Reporter (Wash., DC), 4/96



tickets.[17] Brewers also sponsor the concert tours of numerous individual rock and country music acts. For example, Budweiser sponsors the "Budweiser concert series" at locations across the country and in 1997 sponsored the New Edition concert tour.

Sports and beer go hand in hand, particularly in the minds of brewers' main target: young men. In 1990, the Coors Brewing Co. embodied this relationship in a special-edition Coors Light can commemorating the University of Nebraska Cornhuskers' championship football season. To reinforce this association throughout the sports season, brewers and their local distributors sponsor the printing of season schedules and advertise in game programs.

Brewers also advertise during broadcasts of college and professional sporting events. In addition to commercials, "non-standard advertising" (stadium signs, logos on scoreboards and brief product sponsorships) has become common. Now that the distilled spirits industry has revised its Code of Good Practice to permit broadcast advertising, liquor ads have begun to join beer commercials on those programs.

College bars in Oxford, England also lure students with dormitory fliers.

"Personal responsibility" is just part of the picture

As they work off campus to increase student consumption and gain student loyalty, brewers and distillers sponsor a variety of "alcohol awareness" messages and activities on campus to demonstrate their interest in the "responsible" consumption of their products. Industry-sponsored organizations with a high profile on college campuses include BACCHUS (Boost Alcohol Consciousness Concerning the Health of University Students), the Century Council, and Beer Drinkers of America (BDA).

In general, these organizations promote the prevention of drunk driving and underage drinking or sponsor vague messages advising students to "know their limits." They focus on individual responsibility without acknowledging the role that alcohol advertising and promotions and other factors play in perpetuating unhealthy drinking norms on campus.

The Lumberjack, 2/28/96

"Shots may be fun, but they're not responsible. It's pushing consumption of a product that endangers the welfare of people."

— Michel Roux, president of Grand Metropolitan's Carillon Importers, *Wall Street Journal* (May 13, 1994).

Standards for Alcohol Marketing On Campus

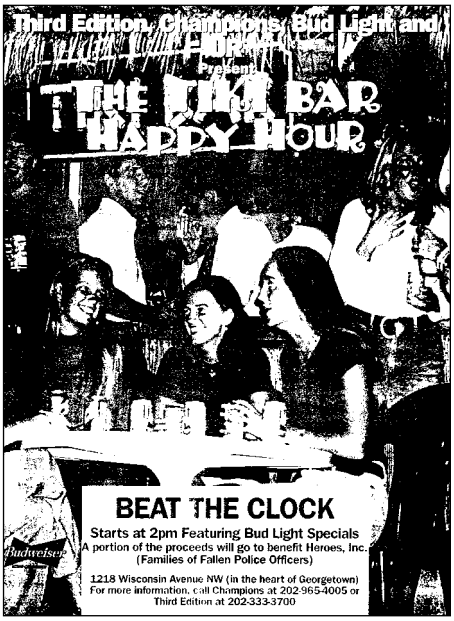
Combating heavy-drinking promotions may require a look at all of the alcohol advertising on campus and a review of the laws and policies that apply to that advertising. Sources of advertising standards include newspaper editorial policies, college alcohol policies, industry advertising codes, and state and local laws. Consider using these standards to challenge non-conforming ads and strengthen the policies that apply on your campus.

Restraint by the industry

The trade associations representing American brewing companies (the Beer Institute), vintners (the Wine Institute), and distillers (the Distilled Spirits Council of the United States, or DISCUS) have adopted codes for the responsible marketing of their products. Those codes contain some restrictions that apply to campus marketing. Generally, the guidelines tend to be vague and unenforceable.

All three associations prohibit advertising that promotes excessive or irresponsible consumption. In fact, most on-campus advertising by alcoholic-beverage producers does not promote heavy drinking. Off campus, however, brewers occasionally target students with ads that seem to violate the Beer Institute's standard against advertising that depicts beer "being consumed excessively, in an irresponsible way."

The Beer Institute and DISCUS place specific restrictions on college marketing. The DISCUS Code of Good Practice prohibits any advertising on campus or in college newspapers. The Beer Institute advertising code permits beer advertising and marketing activities on campus or at college-sponsored events "only when permitted by appropriate college policy." Another brewer restriction advises that ads "*should* not portray consumption of beer as being important to education, nor shall advertising directly or indirectly degrade studying" (emphasis added).



University Reporter (Wash., DC), 4/97

Do "Beat the Clock" happy hours suggest irresponsible drinking?

Beer Institute Advertising Code (excerpts):

"Beer advertising and marketing materials should not depict situations where beer is being consumed excessively, in an irresponsible way."

"Beer advertising and marketing activities on college and university campuses or in college media, should not portray consumption of beer as being important to education, nor shall advertising directly or indirectly degrade studying. Beer may be advertised and marketed on college campuses or at college-sponsored events only when permitted by appropriate college policy."

Distilled Spirits Council of the U.S. (DISCUS) Code of Good Practice (excerpts):

"Distilled spirits should not be advertised on college and university campuses or in college and university newspapers."

"Promotional activities for distilled spirits should not be conducted on college and university campuses except in licensed retail establishments located on such campuses."

Hospitality industry standards

Many bar owners have responded to increasing community pressure and liability concerns by adopting voluntary "responsible hospitality" marketing and service standards that aim to protect the well-being of patrons and limit the establishments' potential liability while maintaining a healthy profit margin. Those bars follow the principles described below.[1] We include ads that illustrate marketing practices which defy standards of responsible ownership.

Signs of a Responsible Establishment

• Pricing to prevent intoxication

The responsible establishment will set prices so as not to encourage heavy consumption and intoxication. Non-alcoholic products will generally be priced competitively with alcoholic products.

• Monitoring drinking

The responsible establishment sets safe drinking limits for guests. The establishment will not promote the sale of drinks in a manner that encourages the service of more than one standard drink to a guest at one time. Management, servers and security staff will monitor guest behavior for signs for intoxication.

• Managing the intoxicated guest

When a guest is approaching his or her limit or displaying visible signs of intoxication, servers will take the necessary steps to pace drinking, offer food, delay service, or contact a manager to refuse service. In no instance will a supervisor or manager override the decision of the server if service is being refused.

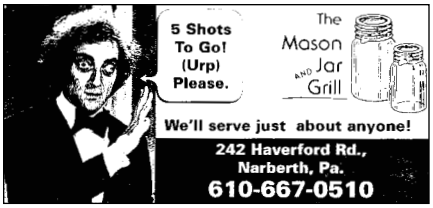
• Marketing responsible beverage service

The responsible establishment promotes its philosophy, policies, and service practices to the public. It informs guests that staff have received specific training in recognizing and dealing with intoxication, age identification, sale of alternative beverages, responsible serving practices, and the laws regarding beverage alcohol sale and service.

The advertisements that appear in this section disregard many, if not all, of these principles. They reflect owners' frequently expressed belief that they must use these dangerous promotions to compete for student patrons and stay in business. Although hospitality industry groups such as the North American Partnership for Responsible Hospitality and the National Licensed Beverage Association (the trade association for bars and other licensed establishments) endorse these or similar guidelines, they have no means of enforcing them. Indeed, few of the bar owners who place such ads belong to those associations.

N. Illinois University Northern Star, 3/7/97

Louisiana State Univ. Daily, 3/14/96



University Reporter (Philadelphia, PA), 4/95

Other voluntary codes

Other groups have developed voluntary guidelines for marketing alcoholic beverages to college students. The organizations that promote the guidelines highlighted below receive financial backing from alcoholic-beverage producers, and those producers have voiced support for their respective advertising codes.

Inter-Association Task Force

The Inter-Association Task Force on Alcohol and Substance Use (IATF), made up of associations of student affairs professionals and industry-funded "alcohol awareness" groups, promotes voluntary guidelines (see Appendix 2) that provide a reasonable starting point for campus efforts to remove ads that promote excessive consumption.

Inter-Association Task Force on Alcohol and Substance Use Guidelines for Beverage Alcohol Marketing on College and University Campuses (excerpts):

1. Alcohol beverage marketing programs specifically targeted for students and/or held on campus should conform to the code of student conduct for the institution and should avoid demeaning sexual or discriminatory portrayal of individuals.

2. Promotion of beverage alcohol should not encourage any form of alcohol abuse nor should it place emphasis on quantity or frequency of use.

. . .

12. Local off-campus promotional activities, primarily directed to students, should be developed with the previous knowledge of appropriate institutional officials.

The IATF guidelines have been endorsed by some industry trade associations. According to the Beer Institute, brewers support these guidelines, which "help ensure that campus beer marketing activities are conducted responsibly, with the approval of appropriate campus officials."[2] The National Licensed Beverage Association (NLBA) also supports the IATF advertising guidelines.[3] Despite such official support, many bar and tavern owners routinely disregard the unenforceable suggestions.

The Century Council

At its inception in 1991, the Century Council, an association of distillers, vintners and the Stroh Brewery Co., adopted a Code of Responsible Marketing and Advertising Practices. Members agree to follow the Code's provisions and to submit an annual report on compliance efforts to the Council.[4] While the advertising codes adopted by the wine and distilled spirits industries tend to be stricter than the Century Council's, the Beer Institute's advertising guidelines are less restrictive.

College and university policies

Campus policies concerning alcohol use and promotion have evolved as the relationship between institutions of higher learning and students has changed. Before the 1960s, most colleges took a paternalistic approach to students, enforcing restrictions on drinking, nighttime curfews and other standards of behavior. The 1960s and '70s, however, witnessed an upheaval in social values, and college-aged individuals assumed an increasingly adult place in society. Factors including the new national voting age of 18, the lowered minimum drinking age in some states, military service in Vietnam, and the presence of older, non-traditional students on campus convinced institutions to shift away from their role in loco parentis and relax campus alcohol controls.

Those societal and campus-based changes led to a dramatic increase in alcohol and other drug problems at colleges across

The Century Council Code of Responsible Marketing & Advertising Practices includes the following restrictions:

No <u>active</u> promotion of licensed beverage products at any event where <u>most</u> of the audience is likely to be below the legal drinking age (emphasis added);

No marketing of licensed beverages at any event on a college campus or any college-sponsored event, or advertising in campus media, except (1) in conformity with policies promulgated by appropriate college officials, or (2) in the absence of such formal policies, with prior approval of appropriate college officials, provided that all other provisions of the Code are satisfied.

No advertising in any tv or radio program or print medium that glamorizes or condones overconsumption "or otherwise irresponsible consumption."

the country.[5] In response, Congress passed legislation in 1984 that caused all 50 states to establish a minimum drinking age of 21 (by 1987) and passed the Drug-Free Schools and Communities Act Amendments in 1989. Those measures require colleges and universities to implement policies designed to reduce illegal alcohol and drug use on campus.

This federal mandate motivated institutions to reconsider the role of alcohol in campus life and debate a variety of possible approaches to mitigating alcohol problems. While some schools have used the policy-development process to initiate a campus-wide dialogue on student drinking and the place of alcohol promotion in college life, others have simply enacted policies with minimal student input. Many policies do little more than define where and when students may drink.[6] If a school's policy refers to alcohol advertising at all, it most likely concerns the advertisement of parties and events sponsored by university-affiliated organizations.

"Unwise alcohol use . . . undermines the intellectual climate of the university. It distracts students from the purposes of higher education and . . . dampens academic motivation and interest."
— Alcohol Policy, University of North Carolina at Chapel Hill, effective Jan. 1, 1996.

Public health professionals, such as former Surgeon General C. Everett Koop, and organizations concerned with the health and safety of young people have urged universities to adopt tough policies restricting alcohol promotion on campus. In 1990 the National Commission on Drug-Free Schools recommended that colleges prohibit all alcohol advertising in school newspapers, at stadiums and at all school events.[7] Because alcohol is illegal for about a third of the undergraduate population and because the presence of alcohol frustrates efforts to create a healthy environment for learning, the Commission argued that colleges should not allow alcohol promotion anywhere on campus. While some schools have responded by adopting advertising restrictions, most have not.

Policies restricting alcohol marketing

No matter what voluntary guidelines alcoholic beverage producers adopt and what legislation the government may enact, the campus environment will be shaped in large measure by policies adopted at each institution. Researchers have tracked changes in alcohol policies at 330 four-year colleges and universities every three years since 1979.[8] Half of the schools which responded to the 1994 College Alcohol Survey reported having a policy that addresses sponsorship of events and promotions by the alcoholic-beverage industry. This figure represents an increase from 41% of schools claiming such a policy in 1991. Of those schools, the percentage that prohibit specific types of sponsorships and promotions has increased significantly between 1991 and 1994.

"Higher education must give shape to the social, legal, and economic environment that influences the decisions that students make about alcohol."
— William DeJong, Ph.D.

Many schools also restrict advertising by local bars and taverns. Those schools may ban advertisements by local bars entirely, prohibit bars from promoting drink specials or limit the locations where establish-

Percentage of Schools Prohibiting Producer Ads, Promotions & Sponsorship[9]

	1991	1994
Alcohol industry advertising **(e.g. brand preference ads)**	24%	34%
Alcohol industry promotions **(e.g. free T-shirts, mugs, scoreboards)**	25%	34%
Alcohol industry official sponsorship **(e.g. charity, athletic events)**	21%	30%

Figure 3

ments may place ads and fliers. More than half of the schools responding to the survey prohibit off-campus establishments from advertising on campus bulletin boards and radio stations. Eighty percent reject the distribution of fliers in dining areas.

Other policies

Campuses that do not explicitly prohibit alcohol promotions or advertising often have formal or informal policies that result in *de facto* bans on certain types of ads. For example, the Campus Poster Policy at the College of Saint Rose in New York requires all signs and fliers to be approved by the Student Affairs Office; unapproved signs don't last long. According to the school's director of alcohol and other drug prevention services, the office routinely rejects advertisements that promote excessive drinking. At the University of North Carolina-Wilmington, marketing guidelines prohibit degrading or sexist images and other offensive ads. In practice, however, the policy is much stricter. The Office of the Dean of Students removes any alcohol ad that refers to brand, quantity or price.

"Alcohol advertising on campus or in campus media . . . shall not portray drinking as a solution to personal or academic problems of students or as an enhancement to social, sexual, or academic status."
— Florida State University Alcohol Policy

Student newspaper policies

Often schools that regulate on-campus alcohol advertising exempt the student-run newspaper. The 1994 College Alcohol Survey found that 83% of responding schools allowed off-campus alcohol establishments to advertise in student newspapers. Some schools that permit alcohol advertising restrict the content of those ads, such as prohibiting ads that refer to happy hours, drink discounts or specific brands of alcohol.

Restrictions on advertisements in student newspapers prove much more controversial than those concerning other forms of promotion. Often, student newspapers function as autonomous organizations, not subject to university regulation. Journalists may oppose attempts to limit alcohol advertisements on both financial and free speech grounds. Students and faculty members may perceive university-imposed restrictions as censorship that runs counter to the principals of academic freedom.

Implementing an Effective Alcohol Advertising Policy

Developing a strong advertising policy is only half the battle. If the policy does not have the backing of key campus constituencies, they may resent it, protest against it, or simply disregard it. The following suggestions may help you gain broad support.

- The alcohol policy committee should include both campus and community representatives. Student representatives will include the student body president, the editor of the campus newspaper, and representatives from the Greek system and other influential student organizations.[10] Community representatives may include the local police, alcoholic beverage control, business owners and responsible tavern owners.
- Solicit feedback from faculty, students and other members of the community. Circulate early policy drafts for comment. Allow for discussion and questions at meetings with campus organizations, focus groups and public hearings.[11]
- Distribute the policy to faculty, students, staff, alumni and parents. Acknowledge participants in the policy's development whenever the new rules are publicized, both to give them credit and to show that all segments of the school were actively involved in the policy's formation.[12]

The entire policy-development process can serve as an educational opportunity. At public hearings and similar meetings, you can discuss alcohol-related problems on campus and the role of alcohol advertising in subverting the university's academic mission.

College Policies on Newspaper Alcohol Ads

"Advertisements for alcoholic beverages may be accepted for non-academic university publications with primary readerships over the legal drinking age. The editors of such publications will reject advertisements which in their judgment encourage excessive use of alcoholic beverages. *The university does not regulate. . . advertisements in. . . student newspapers, but encourages the editorship to make responsible decisions regarding advertising for alcoholic beverages."*

— Policy Statement on Alcohol-Related Advertising & Promotions, Johns Hopkins University, MD (emphasis added).

"No group, including the *Ithacan* and other College publications, may solicit or advertise . . . businesses which indicate that alcoholic beverages are free or sold at reduced prices, or otherwise appear to encourage unlimited or excessive drinking of alcohol."

— General Solicitation & Advertising Guidelines, Ithaca College, NY.

In addition to ethical concerns, universities may face legal constraints on their ability to restrict newspaper ads. The First Amendment probably protects the right of journalists at public institutions to accept alcohol advertising if they choose. Because the First Amendment only guards against censorship by the government, however, in most circumstances newspapers at private universities would not have the same protection.

"A paper could have a 'no alcohol policy' but if the business manager wants to run a 'drink til you puke' ad, there is nothing that the school president can do about it."
— Julio Fernandez, former business manager, *Miami Hurricane*, University of Miami

Some schools use less coercive means to change a newspaper's advertising policy. The dean of students or another administrator may meet periodically with the paper's editorial board to encourage more restrictive advertising policies, but may leave the final decision to the paper's editors. This process may be cumbersome, as editorial boards change frequently. With some editors, it may lead to greater sensitivity in the paper's overall coverage of alcohol issues. Others may continue to focus only on the financial benefits of alcohol advertising.

Even without administration involvement, alcohol issues can be contentious. At Bellarmine College in Kentucky, the issue of alcohol advertising in the *Concord* became so divisive that the editorial board put the question of whether to ban alcohol advertising to a student vote. Students reaffirmed the existing policy permitting the ads.

Many papers subject alcohol advertising to the same standards as ads for any other product. *The Colonnade* at Georgia College, for example, will publish ads for any product, except firearms, subject to editorial discretion. This policy gives editors the freedom to refuse any ad without comment if they feel it is inappropriate for the campus. While such a policy may simplify procedures for the editorial staff, it does not provide much guidance for either advertisers or editors. An ad which may be deemed inappropriate during one semester may be accepted in another, depending on the particular editor's viewpoint and the newspaper's financial needs at the time.

Editorial boards that have explicitly addressed alcohol advertising have developed a variety of policies to balance the papers' financial interests with their campuses' interest in maintaining a safe and healthy learning environment. Some newspapers require alcohol advertisements to carry a statement urging students to drink responsibly. Others define specific types of alcohol ads that will not be accepted. Still others have adopted policies which simply state that the paper will not accept advertisements that promote excessive or irresponsible consumption of alcohol.

State laws restricting on-campus marketing

Although the federal government has yet to take action to challenge alcohol marketing on campus (other than Federal Trade Commission oversight of misleading, deceptive or unfair ads), some states have passed laws intended to reduce campus-based promotions and advertising. The following examples highlight their differing strategies.

Newspaper Policies

"The advertisement must . . . not encourage or promote an unhealthy consumption of alcohol, and must comply with applicable alcohol advertising state and federal laws."
—*Daily Aztec*, San Diego State University, CA.

"I. *The Courier* will reject alcohol advertising which promotes or encourages excessive and/or irresponsible drinking.
II. The Courier will require alcohol advertisements to carry disclaimers promoting responsible and sensible drinking practices.
A. Liquor store ads will carry a proof-of-age policy or disclaimer.
B. Drinking establishment ads will carry a disclaimer promoting socially responsible alcohol consumption."
—*Western Courier*, Western Illinois University.

"*The Daily Kent Stater* will not accept alcohol advertising that:

- encourages alcohol abuse or emphasizes quantity and frequency of use.
- portrays drinking alcohol as a solution to problems or necessary to social, sexual or academic success.
- associates alcohol consumption with tasks that require skill, including operation of motor vehicles or machinery.
- includes such phrases as "All you can drink" or "unlimited drinks."
- violates state laws or policies of the Ohio Liquor Control Commission."

—*Daily Kent Stater*, Kent State University, OH.

"*The Echo* will not accept advertising that promotes excessive and/or irresponsible consumption of alcohol."
—*Eastern Echo*, Eastern Michigan University.

Michigan & Washington: Promotions prohibited

In 1985, the Michigan Liquor Control Commission proposed rules to bar alcohol industry representatives from college campuses and remove alcohol advertisements from student newspapers.[13] That proposal, the first of its kind in the nation, drew strong opposition from alcohol industry representatives, who insisted that they had a right to promote drinking to Michigan's half million college students. They lobbied for a less restrictive rule.[14]

With its final rulemaking, Michigan's Liquor Control Commission stopped short of the all-out ban that industry representatives feared. Michigan's rule prohibits any activities on campuses in the state designed to promote the sale or consumption of alcohol, as well as participation by alcohol producers or licensed wholesalers in activities sponsored by any student group that has a majority of members under 21.[15] This prohibition effectively eliminated the use of campus representatives by beer producers and distributors.

The rule's exceptions allow industry representatives to maintain a limited presence on campus. Alcohol ads may still appear in student newspapers and periodicals, and the industry may still sponsor some campus activities and organizations, with restrictions.[16] Liquor licensees must obtain approval from the Liquor Control Commission to sponsor alcohol awareness programs on campus or to provide financial assistance to campus organizations. To request Liquor Control Commission approval, licensees must provide the Commission with written approval from the governing body of the college or university and a letter providing information about the nature of the sponsorship or contribution.[17]

"[Our] concern is those ads that promote excessive drinking . . . where the inference is that you can't be a big man on campus without having a couple of swigs of brew."
— Liquor Control Commission member Alex Laggis, *Detroit Free Press* (2/19/85)

Washington's state legislature passed a similar measure, with similar exceptions, during the same year. The law prohibits promotional activities for any alcoholic beverage on any college or university campus, as well as activities that facilitate or promote the consumption of alcoholic beverages by college or university students.[18]

Virginia: Sponsorship and advertising restrictions

Virginia relied on the state's authority to regulate underage drinking to justify rules against alcohol advertising in college student publications. Unless in reference to a "dining establishment," alcohol advertising is prohibited in any college or university publication that "is distributed or is intended to be distributed primarily to persons under 21 years of age."[19] Advertisements by a dining establishment may not refer to brand names or prices.[20] Virginia permits alcohol awareness advertising in student newspapers, as long as the sponsoring company's logo occupies no more than 10% of the advertising space and the ad contains no reference to or pictures of the sponsor's brands.[21]

Virginia also limits alcoholic beverage advertising in connection with the sponsorship of public events. Any sponsorship "on a college level" is prohibited.[22] However, the regulations permit manufacturers to sponsor and wholesalers to co-sponsor off-campus charitable events.[23] This provision would permit the sponsorship of "charity" bar crawls in college communities.

Utah: Sponsorship and advertising prohibited

Also citing its authority to regulate underage drinking, Utah's Alcoholic Beverage Control Board issued a rule that prohibits alcohol advertising in college or university media and sponsorship of any college or university activity by alcohol retailers or manufacturers.[24]

New York: Trying to bring it all together

During the 1993-94 legislative session, then-Governor Mario Cuomo submitted a proposal to the New York State Legislature that would have limited promotional and advertising activities by individuals or establishments licensed under the state alcoholic beverage control law.

Although it did not pass, we highlight this legislation as a model for efforts to limit alcohol advertisements and promotions on campus. The bill resulted in positive changes on campuses in New York. It called attention to troubling marketing practices. Also, it convinced many bar owners that in order to eliminate the perception that legislative restriction of on-campus marketing was needed, they had to work with campus officials to develop mutually acceptable advertising guidelines.

The New York proposal would have prohibited ABC licensees from:

- Placing any advertisement or promotional scheme directed to promote the use of alcoholic beverages in any college or university newspaper;
- Engaging in any advertisement or promotional scheme on the grounds of any college or university that requires the purchase or consumption of an alcoholic beverage in order to participate in any promotion, program, or activity; and
- Distributing written materials which promote or encourage the sale, use, or consumption of alcoholic beverages by minors on the grounds of a college or university.

Free speech issues

Washington and Michigan each considered, then rejected, restricting advertisements in student newspapers. Wherever legislatures have proposed such measures,

alcohol-industry representatives have protested that the restrictions unconstitutionally violate their First Amendment right to freedom of speech.

Although the First Amendment issues have not all been resolved, "commercial speech" has generally received less constitutional protection than political speech. The First Amendment allows the government to restrict advertising if it shows a compelling interest in doing so. The restriction must directly advance this government interest and be no more extensive than necessary.

Legislatures that have limited alcohol advertising in college newspapers and on campus have addressed this constitutional test by framing the legislation as a means to reduce illegal underage drinking. Restrictions on alcohol advertising on campus and in the campus media could be upheld if the state can present evidence that the restriction would be an effective, if not the only, means of reducing alcohol consumption by minors.

Federal law

Federal law does not provide much help in restricting campus alcohol advertising. The Drug-Free Schools and Communities Act Amendments of 1989 require institutions of higher learning to certify to the Department of Education that they have implemented a policy that prohibits the *unlawful* possession, use or distribution of drugs or alcohol on college property, or as part of a college activity. Schools must distribute to each student annually a document describing: health risks of using illicit drugs and alcohol; available counseling programs; local, state and federal legal sanctions for illegal use or possession of alcohol and other drugs; and the institution's own sanctions. Finally, each school must ensure consistent enforcement of these sanctions and review its policy every two years. Since 1994, efforts have been made in Congress to expand the act to include restrictions on alcohol advertising, but those changes are not expected soon.

Checking Out Campus Advertising Standards

Does the advertising violate an industry code?

- ☐ Contact the advertiser and the industry trade association to discuss the violation.
- ☐ If the ad appeared in the newspaper, inform the editors that the ad violates industry standards.
- ☐ If the ad appeared on campus, contact the office of student affairs or the president's office.

Does the advertising violate campus policy?

- ☐ Contact the office responsible for policy enforcement, the office of student affairs, or the president's office. Ask that the ad be removed and that the president send a letter of complaint to the advertiser and the liquor control board.
- ☐ Contact the advertiser to discuss the violation.

Does the advertising violate newspaper policy?

- ☐ Contact the editor-in-chief to discuss the newspaper's enforcement of its ad policy.
- ☐ Contact the paper's faculty adviser.
- ☐ Contact the advertiser.

Does the advertising violate state law?

- ☐ Report the violation to the liquor control board.
- ☐ Contact the college president's office to request that the college send a letter of complaint to the advertiser and the liquor control board.
- ☐ Contact the advertiser.

Know the codes

Once you have identified the advertising standards that apply on campus, you can work to strengthen and enforce them. You can:

- meet with the editorial board of the college newspaper to discuss the problems that high-risk bar promotions cause for students, and offer to help develop an advertising policy that rejects those practices,

- talk with the university president or student government about developing a policy restricting alcohol advertising on campus, or

- work with other college communities in your state to pass legislation restricting campus alcohol ads.

Selling Drinks: Rules of the Game

Just as widespread participation in the creation of alcohol advertising policy contributes to its acceptance on campus, the involvement of students and other segments of the college community can increase the ability of neighborhood efforts to put pressure on establishments that encourage heavy drinking. Students, neighborhood residents and business owners can find common ground working to stop the marketing and server practices that place the health and safety of the entire community at risk.

The alcoholic-beverage control laws in your state and community provide a variety of legal tools to help stop marketing practices that lure students off campus to overindulge.[1] The laws described below may already be in place in your community. If so, you may wish to advocate increased enforcement. In communities that do not have some of these laws on the books, a campaign to pass such legislation can be a powerful motivator for establishments to agree to voluntary controls. Where bar owners remain uncooperative, enforcement of new laws may be needed to change your community's drinking environment.

Laws restricting drink specials

Many bars attract price-conscious students by offering drink specials and similar promotions that encourage customers to consume excessive amounts of alcohol. Responding to the health and safety risks created by these marketing practices, 24 states have enacted laws or regulations that prohibit or limit some of those promotions.[2] Appendix 3 highlights these laws. Bars violating them may lose their licenses or face other administrative penalties.

"All-you-can-drink" specials

Bars that offer "all-you-can-drink" or an unlimited quantity of alcohol for one low price acknowledge an intention to serve patrons regardless of their level of intoxication. Because such specials tend to be time-limited (for example, "all-you-can-drink from 9 'til midnight"), customers feel pressure to drink quickly, making it more difficult for them to

On premises where alcoholic beverages are sold by the drink, a licensee . . . may not sell . . . an unlimited number of alcoholic beverages . . . during a set period of time for a fixed price.

Alaska Statutes § 04.16.015(a)(4) (Oct. 1994)

N. Iowa University, Northern Iowan, 3/15/96

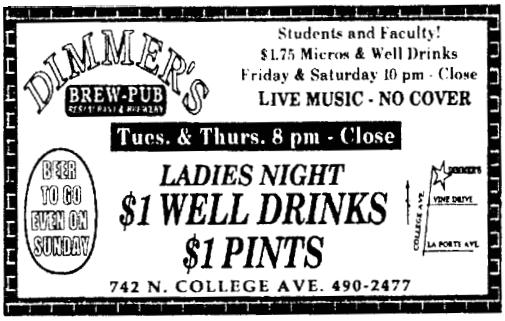
[I]t shall be unlawful for any licensee: To establish a single retail price based upon the required purchase of two or more drinks.

Alabama Admin. Code Supp. § 20-X-6.14(1)(b) (Sept. 1990)

gauge how drunk they become. For this reason, 18 states prohibit or restrict "all-you-can-drink" specials.

"Two-fers"

Bars that offer patrons two or more drinks for the price of one essentially force customers to order their "next" drink before they've consumed their current drink. Like "all-you-can-drink" specials, "two-fers" make it difficult for customers to pace their drinking or monitor their level of intoxication. Because servers usually deliver two drinks at once, patrons may also drink faster to get to the second drink before it becomes flat or warm. Fourteen states specifically prohibit or restrict selling two or more drinks for the price of one.



Rocky Mtn. Collegian, Colorado State Univ., 3/8/96

Happy hours

Like other time-limited drink specials, "happy hours" encourage customers to consume a large number of drinks in a short time. Six states prohibit happy-hour drink specials, while seven others restrict the hours during which bars may offer discounts. Although New Hampshire allows happy hours, bars may not refer to "happy hour" in their advertisements.[3] As we go to press, a measure banning happy-hour drink specials in Florida is gaining momentum in the state legislature.[4]

Ladies nights

On "ladies nights," bars offer special discounts to female customers with the expectation that they will attract larger crowds of males who pay full price. Like other drink specials, ladies nights encourage women to drink more than they might normally. Although males pay full price, they too will presumably increase their consumption to keep up with or out-drink their female companions.

It is unlawful for a holder of a retailer's permit to: Sell alcoholic beverages during a portion of the day at a price that is reduced from the . . . established price that the permittee charges during the remainder of that day.

Indiana Stat. Ann. § 7.1-5-10-20(a)(1) (1991)

Few state laws specifically refer to "ladies nights." Laws prohibiting licensees from offering drinks to one group of persons at a price lower than that offered to other customers would, however, proscribe the practice. Based on this definition, seven states ban ladies nights, and four others restrict the hours during which bars may offer "ladies night" specials. In addition, the Minnesota Department of Human Rights has ruled that this marketing practice constitutes illegal gender-based discrimination.

Other laws restricting bar promotions

When laws prohibit specific marketing practices, bars may develop new specials that the legislature had not even considered. For instance, they may respond to a prohibition against offering two drinks for the price of one by offering a single drink that happens to be twice as large as the usual serving or offering to add a second shot of liquor to a mixed drink ("make it a double") for little or no additional charge. To counter this strategy, nine states prohibit or restrict drink

An on-premise permittee . . . shall not give away a drink or sell one at a price that is different from the usual. . . price charged for the drink for any period of time less than one full business day. Free or reduced drinks under this provision shall be offered to all customers, not just a segment of the population.

North Carolina Admin. Code § 4.2S.0232(b) (1994)

specials in which bars charge their usual price for a larger drink.

Bars may get around restrictions against all-you-can-drink specials or free drinks by charging ridiculously low prices for drinks, sometimes in conjunction with a cover charge (a fee for admission to the bar). "Coin nights," "nickel pitchers" and "quarter shots" all encourage customers to drink excessively. In some states, "happy hour" laws may prohibit these practices. Texas prohibits bars from charging a cover price for admission, then selling penny drinks or drinks for "any coin."[5] Massachusetts bans any promotion that results in the sale of drinks at a price that is lower than the bar's cost.[6] Maine rejects any marketing practice that has the specific purpose "to encourage customers to drink to excess."[7]

The table in Appendix 3 refers to state statutes and regulations that can help eliminate some of the bar practices which place customers, and the community, at greatest risk. Check with the local liquor control board to find out what restrictions apply in your community.

Service to intoxicated persons

Most states prohibit licensed establishments from serving alcohol to intoxicated patrons. Servers who violate those laws are usually subject to misdemeanor criminal charges (a fine and possible imprisonment), while licensees (bar owners) face administrative penalties (license suspension or revocation) as well as fines. These laws appear ready-made to prevent excessive consumption *and* marketing practices that promote this behavior. Unfortunately, their enforcement is spotty and the penalties may be insufficient deterrents.

When enforcement is weak, establishments may find it financially advantageous to continue serving intoxicated patrons and pay the occasional fine. In Oregon, for example, the law prohibits licensees from "knowingly" serving alcoholic beverages to a "visibly intoxicated" person.[8] However, the alcoholic beverage commission can only issue letters of reprimand for the first three violations of this provision within a two-year period. Blessed with a high standard of proof, weak enforcement and even weaker penalties, Oregon bar owners have little reason for concern until they have received one or two letters of reprimand.

The holder of a permit issued by the department of liquor control . . . shall not: Increase the volume of alcoholic beverages contained in a serving without increasing proportionately the price charged for such serving.

Ohio Admin. Code § 4301:1-1-50 (3) (1994)

Rocky Mtn. Collegian, Colorado State Univ., 3/7/96

Is the bar that placed this ad offering to violate Colorado's law against selling alcoholic beverages to a visibly intoxicated person?

Ultimately, the enforcement of laws prohibiting service to intoxicated patrons requires a significant commitment of resources. Officers must be in the bars monitoring patrons' consumption and noting which servers continue to bring them drinks. One study found that it took an average of 1.5 hours of observation for officers to witness one request for alcohol service by an

"No licensee or employee of any licensee shall in any manner provide or allow possession of an alcoholic beverage to or by a person who is intoxicated or incapacitated by alcohol and/or other drugs."
- Nebraska Liquor Control Act, Rules & Regulations R6-019.N

intoxicated person.[9] However, national studies indicate that the benefits of increased enforcement in accident-related costs alone far outweigh the enforcement costs.[10]

Zero in on problem bars

Focusing law enforcement efforts on problem establishments can help make the most of limited resources. Police in many areas now track "last drink data," identifying the last place to serve a drunk driver before he or she got behind the wheel. By targeting bars that regularly serve drivers to the point of intoxication, police may be able to prevent future tragedies.

Targeting advertisements can also help. Many of the bar ads depicted in this guide virtually guarantee students that they will continue to be served when intoxicated. Community members can aid enforcement efforts by bringing those ads to the attention of alcoholic-beverage control and police officers.

Community monitoring can help in other ways, too. If patrons are seen stumbling away from a particular bar, citizen complaints can direct law enforcement efforts. Of course, community members can also go into the bars and note violations. The information from an "undercover" visit to a bar may spur police action. Alternatively, a well-publicized monitoring campaign that promises in advance to share information about violations with police and the press may intimidate some owners into changing their serving practices, if only temporarily.

Beef up enforcement

Stricter enforcement of laws prohibiting sales to intoxicated customers (or the threat of stricter enforcement) can benefit the community. In Washtenaw County, Michigan (home of the University of Michigan), officials took a multi-step approach to promoting compliance with laws against serving intoxicated customers. First, the police invited the county's 205 licensees to a presentation explaining the enforcement effort. Once the effort began, licensees who were visited by undercover officials but not cited received a post-visit report notifying them that they had been objects of enforcement. Officials maintained visibility by encouraging media coverage of the enforcement effort and its effects on establishments. Those reminders from the media and police kept bar owners vigilant.

Officers concentrated their efforts on the establishments responsible for the greatest number of drunk drivers, as reported by individuals arrested for driving while intoxicated (DWI). This focus led to increased enforcement at bars serving college students, which were responsible for 15 times the number of DWIs as restaurants and other establishments not frequented by students.[11]

Washtenaw County's efforts led to measurable improvements. Refusals of alcohol service to intoxicated patrons increased by more than 300% immediately after the program began. Although refusals declined over time (indicating that "refresher" meetings and continued enforcement efforts are needed to reinforce these changes), servers continued to refuse to provide drinks to intoxicated customers at more than double the previous rate one year after the program's introduction. Over the same period, the proportion of DWIs coming from bars also declined by one-quarter.[12]

To ensure that enforcement efforts continue over time, consider working for an ordinance that requires a minimum number of compliance checks each year at each licensed premise. See Appendix 4 for a sample of a proposed ordinance.

Stop the pub crawl

In April 1996, residents of Pacific Beach, California (near San Diego State University), prevented a planned "pub krawl" by using a law prohibiting service to intoxicated patrons. The event's organizers pulled out after receiving complaints from the district's councilman and a letter from the Department of Alcoholic Beverage Control threatening to close down participating bars for 15 days if it found anyone who was already intoxicated being served.[13]

Work with your alcoholic beverage control board and interested political figures to put pressure on bars that participate in crawls or offer irresponsible specials in your community. Once they are on notice that these specials invite close scrutiny of their practices, bar owners may market their goods more responsibly.

Laws promoting responsible bar policies

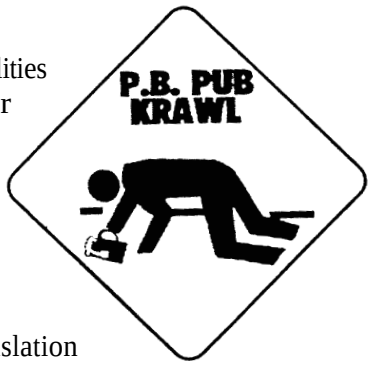
Some states have enacted laws that encourage voluntary changes in bar policies. These include mandatory server training and dram shop liability. The laws provide incentives for bar owners to change their marketing practices and for servers to monitor patrons for signs of intoxication. They complement laws against serving intoxicated patrons by increasing compliance with those laws without adding much to enforcement costs.

Although these laws focus on *server* practices, they also influence bar advertising and promotional practices. Most manager and owner training programs include information on responsible marketing practices. The programs' review of state happy hour laws and laws against service to intoxicated patrons can also deter high-risk promotions. Similarly, "dram shop laws," which hold bar owners or servers liable for damages caused by their drunk patrons, can discourage promotions that might lead patrons to drink excessively and cause harm to others.

Mandatory server training

Since the early 1980s, support for server training programs has grown among state liquor control boards, health activists, insurance companies and bar owners themselves. Many state liquor boards offer voluntary programs, and insurance companies may offer reduced rates for bar owners who require this training for their employees.

Seven states and many municipalities now mandate server education or make employment of trained servers virtually a necessity for establishments.[14] Appendix 4 contains a model city ordinance requiring server training.



The Daily Aztec, San Diego State Univ., 4/25/96

In 1985 Oregon passed legislation requiring that all servers, managers and owners attend a state-approved course every five years. By the end of 1991, all Oregon servers had completed the course, which includes information about alcohol's effect on the body, Oregon alcohol service and drunk-driving laws, effective server intervention techniques and alcohol marketing practices for responsible beverage service.

Studies of Oregon's experience have concluded that legislation mandating server training has a beneficial effect on public health and safety. Servers demonstrate greater awareness and knowledge of how to count and space drinks for customers to avoid intoxication. Managers and owners become more supportive of those server techniques and more aware of their own potential liability for risky policies and practices. Oregon's law has also helped significantly reduce the number of single-vehicle nighttime car crashes.[15]

Training in responsible beverage service can help prevent excessive student drinking at bars in college communities.

Combining training with regulations that ban happy hours and similar drink specials can be particularly effective by ensuring that establishments practicing responsible alcohol service will not be competitively disadvantaged in relation to other bars.[16] Mandatory server training will also discourage the practice of bringing in student "guest bartenders," unless those students have attended an approved training program.

Dram shop liability

Dram shop liability refers to the legal principal that bar owners and servers may be held financially responsible for injuries or property damage caused by an intoxicated or underage customer who is served by the establishment. In most cases, a third party who has been injured by a drunk driver will bring a civil suit under the state's dram shop law against the bar that served the driver to the point of intoxication and allowed him or her to get behind the wheel. Thirty-six states have statutes establishing some form of dram shop liability, while the courts in seven other states and the District of Columbia recognize dram shop liability based on common law.[17]

Although dram shop laws originated to provide a means of financial recovery for the victims of alcohol-related injuries, the Model Alcoholic Beverage Retail Licensee Liability Act of 1985 creates additional incentives for bar owners to adopt responsible business practices.[18] Part of the Model Act requires courts to look specifically at a defendant bar's business practices as a way of evaluating the extent to which the bar meets current industry and community standards.[19] Establishments that have adopted responsible business practices may claim those practices in defense of an action. The section gives licensees a strong incentive to adopt responsible policies and work with members of the community to prevent alcohol-related problems.

Publicizing existing server-liability laws can help persuade bar owners to adopt more responsible policies. Bar owners in Iowa City, home of the University of Iowa, have been re-evaluating their marketing and server practices since a February 1997 jury decision found a popular night spot liable for $1.3 million in damages in a crash caused by a student that severely injured a family of four.[20] The case has stimulated discussion of bar practices throughout the community.

Other ways to fight high-risk promotions

Challenged to develop innovative solutions to enduring problems, states and communities have come up with a number of strategies that can help fight irresponsible marketing and server practices at bars in college communities. Some are described below:

Section 10 of the Model Alcoholic Beverage Retail Licensee Liability Act calls on the jury to consider the licensee's business practices, including:

- the adequacy and training of the licensee's staff;
- the existence of written policies regarding the sale of alcoholic beverages;
- the existence of standardized hiring and reprimand policies;
- the availability of alternative safe transportation;
- the availability of food and nonalcoholic beverages; and
- the extent of cooperation between the licensee and the surrounding community in the prevention effort.

- Sting operations: The term refers to the surprise appearance of officers at a bar or other retailer, usually to check IDs and issue citations to minors found with alcohol or to fine vendors caught selling to underage or intoxicated persons. Stings can lead to real changes in sale policies only if officers cite bar owners (not just patrons or servers) for violations and if they are well-publicized and repeated over time.

- Automatic license revocation for repeat violations: California recently enacted legislation providing for the revocation of an establishment's liquor license after three convictions for selling to minors within a three-year period.[21] Ideally, "three strikes laws" would call for license revocation after three convictions for any liquor law violation, including sales to minors or intoxicated individuals.

- Consumer-protection laws: State laws generally prohibit unfair, deceptive or misleading advertising. It may be misleading for a bar to advertise "all-you-can-drink for $5" when the law prohibits service to intoxicated individuals, even if they are still capable of drinking.

- Bounties: Community members and enforcement agencies can offer financial rewards to individuals who report bars that serve intoxicated patrons.

- Minimum age of 21 to enter bars: Once they enter a bar, younger students can often find someone to buy beer for them or even buy it themselves. Because these younger students tend to binge more than older students, keeping them out of bars can reduce alcohol-related problems off campus.

You can take a number of actions to implement effective laws in your community. Start by learning the law, monitoring enforcement levels and looking for areas where improvement may be needed. Consider working with state or local lawmakers to pass laws such as those described in this chapter or to increase funding for the enforcement of existing measures. You can help increase compliance with those laws by educating bar owners and other community members about legal requirements governing bar marketing practices and calling attention to violations of those requirements.

Daily Iowan, University of Iowa, 3/14/96

Local Action to Clean Up the Bar Scene

Although there's a lot that you can do using state laws and regulations,[1] don't pass up opportunities in your own community. Local jurisdictions often share authority with states to pass some of the requirements described in the previous chapter. In addition, local jurisdictions have powerful measures of their own to challenge high-risk practices at problem bars.

City or county council members may be more responsive than remote state lawmakers. Moreover, local reforms can set precedents. By passing an ordinance that changes bar practices in your community, you provide a model for other communities and set the stage for passage of statewide legislation in the future.

This section examines the use of license challenges, local planning ordinances and other community-based strategies to dilute the high concentration of bars found in many college communities and address problems caused by individual bar practices.

Making the licensing process work

The liquor licensing process provides a vehicle for community activists to express concerns about the impact that an additional bar or liquor store may have on a neighborhood or to challenge the practices of an existing establishment. The licensing process will vary by state, but the following outline provides a general description of typical procedures.[2]

The typical licensing process

A business owner wishing to sell alcoholic beverages must first file an application with the Alcoholic Beverage Control Board (ABC) and post a notice of intent to sell alcoholic beverages on the premises. Groups that want to review an application may request that the ABC and local agencies inform them of pending applications. Normally, there is a waiting period of 30 days from application, during which the ABC will accept protests from the public, local police, the city attorney and the city council.

Protests constitute formal objections to the issuance of a license by the ABC. They must be supported by specific sections of the ABC code and its associated administrative rules. For example, one could protest a liquor license requested by a convenience store that is adjacent to an elementary school if the ABC code prohibits sales of alcohol within 500 feet of a public school. However, a protest based on general neighborhood concerns that an additional bar might increase crime in the area would likely fail.

The ABC reviews applications to determine whether licenses may be issued under the provisions of the ABC code. In addition, city authorities review applications for compliance with relevant planning and zoning ordinances. The ABC will not approve applications for licenses that would violate a local zoning ordinance.

The ABC may hold hearings based on protests, complaints and accusations against the establishment. Complaints based on specific sections of the ABC code notify the ABC of problems with the operation of an existing outlet. If an ABC investigation finds specific code violations, the agency will file a formal accusation. During hearings, the applicant and the public will have an opportunity to comment on the alleged violations. Finally, the applicant will have the right to appeal (for example, to the city council) if the ABC refuses to grant a license.

This process offers several chances for input into the decision to grant or renew a

liquor license. Where violations and problems caused by a business have been documented, you may succeed in blocking a license renewal or having a license suspended or revoked. For new license applications, calling attention to reasons that the license should not be granted — for example, excessive outlet density that violates zoning requirements — may effectively block it.

Learn the licensing requirements where you live and use them to define standards of acceptable marketing practices. Dennis McBee, Alcohol and Drug Education Coordinator at the University of Vermont in Burlington, convinced his local licensing board to consider bar advertising on campus as evidence pertaining to "responsible ownership" (a requirement under city laws for alcoholic beverage establishments). As a result of McBee's prodding, the city invited license holders to a meeting addressing advertisements, posters and fliers that promote abusive drinking. City officials then issued warnings of license suspension to owners who placed irresponsible ads. They have succeeded in eliminating most on-campus advertisements that promote high-risk drinking.

Licensing requirements can also be used to persuade bar owners to make voluntary changes. At Northern Illinois University, where irresponsible advertising has been a regular problem, the vice president for student affairs sends a form letter to owners whenever they place objectionable ads on campus. In the letter, he threatens to write to the mayor and the liquor commissioner to have the bar's liquor license revoked. To soften the blow, his letter also offers to acknowledge bars that agree to advertise responsibly in the campus newspaper. Although the vice president has no special influence with the liquor commissioner, this strategy has usually proven successful.

Zoning for community safety

The Alestle/ Southern Illinois Univ.-Edwardville, 3/14/96

Changing individual bar practices in most communities will not resolve all of the problems created by student drinking. The bars' very presence near campus and their concentration in one area of town may in itself be a significant source of problems. Bars and liquor stores line the periphery of many campuses, and this density of alcohol outlets gives rise to increased alcoholism, drunk driving and violence.[3] According to one national study, the amount that students drink, the likelihood that an individual student will drink and the likelihood that he or she will binge all increase significantly when a greater number of outlets licensed to sell alcoholic beverages exist near campus.[4]

Local land use ordinances provide a useful tool to combat problems that arise as a result of having too many liquor licensees clustered within a small area. Although states may reserve the exclusive right to license and regulate the manufacture and sale of alcoholic beverages,[5] communities have the right to impose zoning restrictions that can help reduce alcohol problems. Depending on state law, your city or county government may be able to limit the number of alcohol outlets in particular geographic regions, require minimum spacing between outlets, require specific structural features (such as outdoor lighting) and prohibit sales at particular types of businesses (such as gas stations or convenience stores).[6]

In Oakland, California, individuals loitering outside liquor stores committed offenses ranging from littering and public urination to drug trafficking and illegal gambling. The City Council responded to complaints from neighbors and the flight of other businesses from downtown with a series of ordinances designed to change the face of

the community. The Council passed a one-year moratorium on new liquor licenses on specific streets with an already-high density of alcohol outlets. In addition, Council action prohibited new liquor stores within 1,000 feet of any existing one. Finally, the City Council passed an ordinance charging a $600 annual fee to stores which sell alcohol. That fund supports community police officers and other officials who are specifically detailed to inspecting liquor stores.

Oakland's "strike force" responds to complaints about problem liquor stores. Officers will conduct an inspection and draw up a list of conditions (more trash cans, better lighting) that the store must correct. Further complaints lead to additional inspections, for which the retailers must pay $200 each, and possibly added conditions. If the store fails to comply, it goes on trial before the City Council and could lose its land use permit.[7]

Preventing alcohol-related problems at the local level:

- use planning and zoning ordinances, including conditional use permits;
- develop server training programs;
- target local problem-solving efforts toward problematic alcohol settings as part of a community prevention program;
- participate in state, national, and institutional initiatives.

From F.D. Wittman, Reducing Environmental Risk of Alcohol Problems (1985).

Communities may also have authority to clean up problem alcohol outlets on a case-by-case basis by imposing "conditional use" or "special use" permits. These permits allow jurisdictions to impose restrictions on how a business must be operated as a prerequisite to receiving a business license. Violations of the restrictions can lead to penalties, including loss of the business license. Cities may impose land-use conditions related to public nuisances, requiring the licensee to take steps to prevent public drunkenness, harassment of passersby, gambling, public urination, littering, loitering, noise, etc. Or they may impose land use conditions related to the sale of alcohol, such as requiring server training, prohibiting sales of single cans of beer, or limiting hours of operation.

In Berkeley, California, home to a large college campus, the city uses its zoning ordinance and conditional use permit process to address nuisance complaints. First, city staff, police and neighbors work with the bar or liquor store to try to reach a mutually acceptable solution to community problems. If they cannot resolve the issue, the city's Zoning Adjustment Board hears complaints and renders findings, which may include ordering a business to close. Owners may appeal the Board's decision to the City Council, then to the state's Superior Court.

Berkeley has had notable success with this process. As a result of nuisance complaints from city residents, three liquor outlets have been ordered closed by the Zoning Adjustment Board since 1994. The Zoning Adjustment Board also amended the conditional use permits of problem bars, requiring nightclubs to hire additional security personnel and comply with other restrictions after receiving complaints from neighbors about nuisance and crime problems. City police credit the process with fostering neighborhood involvement and increasing cooperation among bar owners, residents and police.

"Town/Gown" Cooperation

Off-campus student drinking can drive a wedge between a college and the surrounding community or it can motivate institutions to play a more active role in addressing local alcohol concerns. Historically, university leaders have often resisted involvement in community activities to prevent alcohol problems out of fear that their participation might be viewed as an admission that the school has exacerbated those problems. Increasingly, however, college presidents

recognize that on-campus prevention efforts need community support to succeed. No matter how tough a school's alcohol policies, they will have little effect if the campus is surrounded by bars that promote unsafe drinking practices.

When colleges work with their surrounding communities to confront alcohol-related problems, both benefit. The participation of school presidents in community prevention efforts enhances the credibility of community coalitions. Their involvement also sends a clear message to students that the school is serious about addressing alcohol and other drug problems, and helps instill a sense of responsibility in students for the neighborhood in which they live.[8] Numerous successful town-gown collaborations provide models for community efforts to fight irresponsible bar promotions.

Responsible Hospitality Council

Figure 4

Responsible Hospitality Councils

The Lincoln/Lancaster County (Nebraska) Responsible Hospitality Council (RHC) includes representatives from the University of Nebraska, the Lincoln Council on Alcoholism and Drugs, the Lincoln Package Beverage Association, the Police Department, the Mayor's Office, the City Council, Mother's Against Drunk Driving, the Health Department, insurance companies, alcoholic-beverage distributors, bars and other area businesses. In addition to offering server and manager training and service guidelines, the RHC sponsors community forums that bring together businesses, university representatives, students and community members to discuss ways to prevent alcohol-related problems and improve the quality of life in the downtown area.

In its first two years the RHC challenged several irresponsible bar marketing practices. One bar had developed a promotion in which patrons who consumed a "Gumbay Smash" (a gallon jug containing approximately 11 drinks) within one hour would have their names engraved in a brick at the bar. To qualify, the bar required patrons to keep the drink in their system (no bathroom breaks or vomiting) and leave the premises immediately afterward. When an employee from another bar was hospitalized after taking the challenge, the owner of that bar contacted the RHC. The Council held several meetings, even discussing the development of laws restricting high-risk promotions. Those meetings provided an opportunity for other bar owners to "really come down hard" on the owner of the bar that offered the promotion. Ultimately, the group shamed the owner into discontinuing the special.

To follow up on this success, the RHC sent a letter to all area bars and restaurants discouraging irresponsible promotions. The RHC's combination of peer pressure and threats of additional regulation proved a successful formula to change marketing practices.

"This proves that when the university works with the city we can make progress. . . in making Lincoln a better place to live and learn."
— University of Nebraska Chancellor James Moeser, *Daily Nebraskan*, Aug. 9, 1996.

The RHC also sponsored a community forum to discuss Lincoln's "birthday bar crawl," a longstanding tradition in which students celebrate their 21st birthday by traveling to dozens of bars, receiving free drinks at each one. Bars at the end of the crawl experienced the greatest problems with drunk crawlers starting fights, damaging property, vomiting and passing out. However, bar owners feared they would lose student business if they stopped serving free drinks to birthday celebrants.

The RHC called a community forum to discuss various aspects of the problem (downtown clean-up, law enforcement, alcohol poisoning, residence hall noise and vandalism, liability for bars). They formed a subcommittee to recommend alternative birthday promotions that would not put patrons at risk. The RHC included students in this process, to ensure that the resulting changes would have their support. Following intense negotiations, 37 bars pledged to stop offering free drinks to celebrants. Instead, the bars agreed to offer non-alcoholic incentives to recognize birthdays, such as coupons for discounts on compact discs.

The agreement to end the birthday bar crawls received enthusiastic support from the city government, the university and the press. The mayor held a joint press conference with the chancellor of the University of Nebraska to praise the bars that had signed the agreement. The RHC's ability to bring positive media attention to bars that adopt responsible business practices provided an added incentive for bars to cooperate and encouraged other bar owners and community groups to join RHC activities. As a result, reforming bar practices has become a higher priority for community members, law enforcement officers and the City Council, leading to the revocation of three liquor licenses in 1996.

The RHC organizes an ongoing program to increase awareness of alcohol issues among both students and bar owners. It trains students to perform on-site risk assessments at the most popular student bars. They observe server practices and take notes about the general atmosphere in the bars. Then they write reports and meet with owners to discuss their findings and encourage changes in the bars' marketing and server practices that will reduce risks to patrons and other community members.

Committee on Town/Gown Relations

Another group that has successfully changed bar marketing practices is the Albany Committee on University and Community Relations, formed in 1990 in response to community complaints about vandalism and noise caused by students returning from downtown bars. Members include the State University of New York (SUNY) at Albany, the College of Saint Rose, students, neighborhood associations, bar and tavern owners, and the Albany police department. The Committee meets twice monthly with community residents to discuss issues ranging from bar practices and student parties to theft prevention and public safety.

Problems with student drinking off campus and irresponsible advertising on campus led the Committee to propose a tavern-owners' advertising agreement (see Appendix 5). The head of the tavern-owners' association strongly supported the agreement, largely because the New York state legislature was considering a proposal to ban

all alcohol advertising on college campuses (discussed in chapter three). Tavern owners hoped that the voluntary measure would decrease the perception that stricter regulation was necessary. All local bars have now signed the agreement, and bar advertisements have become noticeably more responsible both on and off campus.

Tavern owners now routinely clear proposed ads with University representatives before distributing them on campus. Although bar owners feared that other bars might break the agreement to gain a competitive advantage, the College of Saint Rose has not had a non-complying ad posted on campus in over a year. One bar had a history of placing wildly objectionable ads on school bulletin boards. However, since Committee members explained to the owner that the college pays students to remove ads that don't conform to the schools' posting policies, the bar's advertising has promoted musical acts rather than drink specials.

The Committee's organizers believe their success comes from maintaining a non-adversarial process and convening regular meetings. Police support (including community safety forums and bar owner/server training) has been crucial, as has rewarding participants with positive media attention and special recognition. The Committee hopes to expand to include representatives from Albany's five other colleges in the near future.[9]

Elements of a successful town/gown committee

Town/gown partnerships depend on communication among the diverse interests in the community. Successful partnerships hold regular meetings to discuss alcohol-related issues in a non-adversarial forum. Committee organizers actively recruit and encourage participation from students, tavern owners, police, campus administrators, business owners and neighbors.

When this non-adversarial process fails to persuade bars to give up high-risk promotions, the coalitions gradually increase the pressure. Cooperating bar owners have proved very effective at explaining business reasons that justify more responsible practices and persuading their peers to "play by the rules."

Successful partnerships use media events to recognize responsible bar owners and highlight positive changes. They hold recognition dinners and awards ceremonies to promote establishments committed to responsible marketing practices. Those events encourage continued cooperation, attract new members and raise public awareness of alcohol-related issues.

Other local strategies

Try out a variety of techniques to confront irresponsible bar promotions. If one approach doesn't succeed, move on to another. Here are a few ideas to get started:

- ***Complain*** to police, city council representatives and bar owners about marketing practices, noise, litter and other problems caused by irresponsible bars;
- ***Picket*** outside of bars that use marketing and server practices that place the community at risk;
- ***Call neighborhood meetings*** to discuss problems and encourage more people to take action;
- ***Start a letter-writing campaign*** to bars, city council members, the mayor's office, police and the local newspaper;

- ***Contact parent and alumni organizations*** and encourage them to protest irresponsible advertising on campus;

- ***Contact the university president*** and encourage her to speak out against bars that inappropriately target students;

- ***Write letters to the editor*** of the local paper, opinion articles and editorials;

- ***Hold a media event*** or issue a press release to call attention to problem establishments;

- ***Threaten a lawsuit,*** and be prepared to make good on your threat if the objectionable condition persists;

- ***File a lawsuit*** against a nuisance bar (you may be able to find an attorney who will give you free advice about the legal requirements for a nuisance-abatement suit);

- ***Call for increased enforcement*** of liquor laws, business permit requirements, fire code regulations, and other legal standards against problem bars;

- ***Go to small claims court*** to sue a bar for property damage caused by drunken patrons;

- ***Meet with local politicians***, such as your city council representative and elected law enforcement officials.

Take note!

Whatever steps you take, keep detailed records. Write down every problem or violation that you see at an area bar, along with the time, date, and location. Note whether you contacted police, the liquor control board or the bar owner and what the response was. Save a copy of any written complaints, and take notes when you make complaints by phone. Keep track of meetings that you attend and any decisions made at those meetings.

The information you collect will have many uses. You will be able to document violations when challenging a bar's liquor license. You'll have a paper trail to support a lawsuit. You'll be able to provide the local media with background information for reports on local alcohol problems. And you will go into meetings with bar owners, politicians and community groups looking and feeling well-prepared and serious about challenging high-risk bar practices. In short, you'll be a force to be reckoned with!

Putting It All Together

In the preceding chapters, we've reviewed student drinking patterns, the results of binge drinking and the promotions that encourage unsafe drinking. We've also described an array of voluntary actions, policies, laws, and regulations that activists around the country have used to discourage irresponsible marketing and service practices. Now we turn to information-gathering and coalition-building techniques that will help build support for any strategy you choose.

"The Way It Is" — Needs assessment

Any effort to change policies begins with a thorough understanding of alcohol marketing and how it affects student drinking and the quality of life in the community. In this section, we describe basic steps for determining how excessive alcohol consumption affects the community and how marketing and server practices contribute to those problems. The first steps involve figuring out what different groups in the community think about the issue and informally surveying the environment to develop a community profile. The next steps require gathering and analyzing information from statistical sources, government officials, media reports, surveys and other resources.

Developing a community profile

To get a feel for the community's attitudes, start by examining the conditions on and off campus, focusing on alcohol marketing and the consequences of heavy student drinking. Pick up a copy of the student newspaper and other periodicals geared toward students, and become familiar with the ways in which local bars advertise to student readers.

Every community is different. To understand the approaches that will have the greatest salience for your community, start by looking, listening and making notes about the differing perspectives you encounter. This process of developing a community profile will not only help gauge the problem, it will also serve as a valuable first step in identifying and approaching potential allies for your efforts.[1]

Building A Campaign

1. Develop a community profile.
2. Gather and analyze information.
3. Organize a coalition.
4. Develop a strategic plan.
5. Evaluate your activities.

Asking the questions that come to mind most easily will help you to discover the community's special character and attitudes. You may find, for example, that neighbors worry about vandalism and late-night noise, but do not think drink specials present a problem. Use your conversations to open people's eyes about the link between bar promotions and the alcohol-related problems that matter to them.

Talk to a broad range of groups and individuals. Meet with campus health officials, fraternity and sorority members, student journalists, civic groups, parents and neighbors. You will probably find that different groups have very different perceptions of the nature of alcohol problems in the community. For example, neighborhood residents may complain about littering and rowdiness, students may express a desire for a wider range of social activities that don't involve alcohol, and local business owners may believe that a high concentration of bars scares off retail customers. Pay attention to differences between groups and listen for areas of common concern.

Treat everyone you meet during this process as a potential ally. Rather than taking an accusatory tone with the college administrator whom you feel has been

lax in enforcing campus alcohol policies or with the head of the tavern-owner's association whose members advertise irresponsible drink specials on campus, listen to the unique perspective of each. Support can come from any quarter — do not alienate anyone by adopting a combative stance from the start. Court allies by demonstrating a willingness to consider (if not necessarily agree with) different viewpoints.

At every step, frame questions and comments with care. Students may become defensive if you start by telling them that student drinking is bothering their neighbors. However, if you first inquire about whether they have suffered any problems as a result of other people's drinking, you may gain some valuable information. Non-judgmental questions may prod some students to realize that their peers' heavy drinking is at the root of a variety of annoyances in their lives and may help motivate them to work for change.

Look around the community. Review police reports and follow "community interest" stories in the media. Is vandalism a recurring theme in the local newspaper (or has it become so prevalent that it is no longer even news)? Are certain areas routinely "trashed" on Saturday or Sunday morning? Do billboards deliver a pro-drinking message directly to area school yards or playgrounds? Do fraternity parties keep the entire neighborhood up into the wee hours every weekend?

Walk around campus. If the school has a policy regarding alcohol advertising on campus, see whether it appears to be enforced. Are bulletin boards and lampposts plastered with fliers announcing drink specials? Do bars get around a "no-posting" policy by writing chalk messages on the pavement outside the freshman dorms? Does the student newspaper seem to be devoted largely to telling students where and how to drink? Are campus social events sponsored by brewing companies or distributors?

Examine the availability and accessibility of alcohol in the community. Are bars and liquor stores clustered along the campus boundaries? Do they make deliveries to residence halls on campus? Are alternative activities available, or do most of the community's social opportunities involve drinking? Is the minimum drinking age enforced at bars and liquor stores near the campus?

Be ready to network, from day one. As you look around the community and ask questions, be alert for opportunities to recruit allies. When respondents seem particularly troubled by alcohol-related problems or interested in your future plans, don't hesitate to invite them to get more involved.

Knowledge is power

To diagnose the alcohol-related problems in your community and strengthen your campaign to reduce them, you'll need hard data. You will probably want to research factors such as local drunk-driving arrests, alcohol-related vandalism and student infractions of the campus alcohol policy. Note that some of this information may be found from both on- and off-campus sources.

Keep track of information needs as you develop a community profile. For example, if community members complain about vandalism, find out just how prevalent the problem really is – how much it costs the community each year, how many vandalism complaints police receive, whether the incidents occur predominately in a particular part of town, and what kind of damage results. Information resources include hospitals, the chamber of commerce, university administration, local newspapers, city and campus police departments, the liquor control

board, local libraries, the state health department, residence hall and student affairs officials, the student health service, and local non-profits working to prevent alcohol-related problems.

Information gathering and analysis take time and effort but pay off in the long run. The more knowledge you have before beginning a campaign, the better your chances of success. A thorough analysis will help determine your next steps and shape the strategies you employ.

For example, students from the Alcohol and Drug Abuse Prevention Team (Project ADAPT) at the University of Missouri-Columbia found advertisements for high-risk drink specials on campus and in the campus newspaper. They wanted to convince bar owners to stop running those ads but knew from earlier conversations that the owners feared losing student customers if they stopped. To find out whether this perception was accurate, Project ADAPT members conducted phone interviews with their peers. They learned that drink specials were less important to students than "good bands or music" or "a good place to meet people." Most students reported that their choice of bars would not change if their chosen bar stopped offering drink specials. Project ADAPT will use this information to show bar owners that they can appeal to students without running high-risk promotions.[2]

"A little help from my friends" — Organizing

Throughout the profiling and information-gathering stages, you will encounter individuals and groups that share your concerns about alcohol-related problems. Organizing involves bringing those separate interests together and empowering them to work toward a common goal. A committed group can accomplish more than any individual working alone.

Community Risk Assessment: Indicators of Alcohol-Related Problems

- Hospital admissions for alcohol overdose and injury
- Alcohol-related vandalism and property damage
- Alcohol-related sexual assaults and other violence
- Drinking and driving crashes and arrests
- Sales of alcohol to minors
- Large parties that get out of control and turn violent
- Alcohol-related academic failures and suspensions
- Public intoxication
- Failure to enforce alcohol laws and policies
- Community members (including students) criticizing enforcement of alcohol rules and laws (letters to editor, etc.)
- Alcohol-related infractions of the student code of conduct
- Alcoholic-beverage promotions targeting students on-campus, advertising in newspapers, and on radio
- Bar promotions that encourage excessive consumption

Adapted from R.J. Rappaport and P.A. Norton, Putting the Pieces Together. Mid-State Substance Abuse Commission, Clare, MI, 1992

Be alert for individuals who seem willing and able to take on a share of the leadership responsibilities. Trying to do everything yourself may alienate those best equipped to help — and exhaust you in the process. Campus/community coalitions tend to have the greatest longevity and impact when five to 10 dedicated people share the burdens of leadership.

Recruiting students: The key to success

Involving students from the start is critical. Identify student opinion leaders on campus. These students may not be in formal leadership positions, and they may not be alcohol abstainers. The student government, the dean's office, residence hall advisors, the athletic department and the interfraternity council may be able to refer you to appropriate contacts.

Coalition Building: Involving the Community

Stakeholders:

students, merchants, community members, bar owners and tavern-owners association

Potential campus allies:

chancellor's office; vice president for student affairs; student activity directors; student health services and wellness coordinators; residence hall advisors; service clubs; recovering community; social clubs, health, and athletic groups; student judicial affairs and campus law enforcement officials; student government; health sciences, sociology, political science, marketing, and communications students and faculty

Potential community allies:

mayor's office, churches, law enforcement officials, service clubs and organizations, city and county council, business associations, families, health and medical facilities, recovering community, MADD and similar organizations, local school board, liquor control board

Media:

student newspaper, campus radio and television stations, community paper(s), local broadcast media.

The student newspaper will also serve as a resource for identifying student collaborators. Watch for letters to the editor about alcohol-related problems. A student who is sufficiently troubled to write a letter to the editor may be motivated to take other actions to address the problem. Also, look for announcements from student groups about activities taking place on Thursday through Saturday nights. The students who participate in those groups may not place such a heavy recreational value on drinking and may be interested in working for changes in the campus drinking culture.

Bring on the bars

At some point, you will want to include bar owners, restaurateurs and servers in your discussions. Carefully consider when and how to approach them. Think about how their involvement is likely to affect the coalition's agenda. In some communities, organizers have invited bar owners to become involved from the earliest planning stages. This approach can foster communication and lead to their greater investment in the outcome, but it may also lead the group away from strategies that could prove most effective, such as periodic "sting" operations and legislation prohibiting happy-hour drink specials. Other organizers have chosen to work with non-bar community members first and have contacted bar members only after they have developed an action plan.

During the community profiling and information-gathering process, note bars and restaurants that stand out for their use of responsible marketing and server practices, not just those that feature irresponsible practices. In all likelihood, the owners of those bars share your desire to end high-risk promotions at other establishments and sympathize with your goals. They may believe that other bars unfairly entice students away from their own establishments or they may worry that community resentment against problem bars will lead to a backlash against all establishments, including theirs. The local tavern owners' association or the owners of a few responsible establishments can help bring valuable peer pressure to bear on owners who target students with high-risk promotions. Gaining the support of bar owners can also help generate positive media coverage for your efforts.

When arranging a meeting, keep in mind that bar owners and managers don't work a traditional nine-to-five schedule. They may not come into the bar until late in the day, when they must give full attention to business. Some coalitions have experienced problems with bar owners who fail to show up for scheduled meetings. Be sensitive to scheduling difficulties, but recognize when a bar owner simply opts not to pursue a cooperative relationship.

Developing a strategic plan

Once you bring together a broad cross-section of community members dedicated to reducing binge-drinking promotions, determine which problems to focus on and what the group hopes to achieve. If the coalition is large, you may get more done by starting with a broad discussion that includes the entire group, then appointing task forces to develop specific goals.

Define the coalition's purpose and goals. Goals articulate the overall purpose or direction of a campaign. They should be broad enough to encompass everything you hope the coalition will eventually achieve, but they should be realistic. For example, "enacting a campus policy that prohibits alcohol advertising" is a more realizable goal than "eliminating alcohol and other drug abuse on and off campus."[3]

Use agreed-upon goals to develop a written strategic plan for the coalition's activities. Community coalitions that develop written plans achieve more than groups that do not.[4]

How are you doing?

From the beginning, evaluating your activities is essential. Your evaluation points should closely mirror coalition goals and objectives. Follow each goal or objective with the question, "Did we achieve what we set out to do?" The more specific the goal, the easier it will be to answer this question. Use evaluation data to publicize successes and to keep your prevention efforts on course.[5]

Choose to succeed

We have offered examples of prevention efforts in other communities to demonstrate the range of strategies at your disposal. Because each community's situation may differ, the same strategies may produce very different results. To develop a strategic plan suited to your community, look to the strengths of coalition partners, the priorities and concerns of neighbors, and the power and influence of those who may oppose your efforts.

Prevention strategies may be cooperative, confrontational, legal, administrative or legislative. Don't limit your efforts to one category. It may be advantageous to pursue non-adversarial and more coercive approaches simultaneously. The specter of legislation or legal action may help persuade reticent bar owners to cooperate more fully in voluntary activities.

Whatever strategies you choose, aim to start with a success. Plan to make the first activity immediate and do-able.[6] For example, bar owners in your community may be reluctant to stop offering drink specials but more willing to accept server training programs. Working with them and the liquor control board, police, and community members to develop and promote a voluntary server training program can open the lines of communication and cooperation, bring about healthy changes in the community and attract positive attention to your coalition.

Think Strategically

A strategic plan usually includes:

- specific goals for the coalition. For example: "The number of complaints for alcohol-related vandalism will decline by 5% each year."
- programs that are related to achieving established goals.
- ways to monitor progress toward the goals.
- a regular public report of the progress made and a means of adjusting goals to changing circumstances.

Join Together. *Leading From the Ground Up: The Third National Survey of the Community Movement Against Substance Abuse.* Boston, 1996.

The Strategy Spectrum

Cooperative strategies

A. Promoting server training
B. Responsible hospitality councils, town/gown committees
C. University policies concerning:
   1. Alcohol advertising and promotion
   2. Sponsorship by alcohol industry
   3. Availability of alcohol-free activities and housing
   4. Disincentives to drink heavily: Friday exams, Saturday morning classes, increased academic expectations
D. Student newspaper advertising policies
E. Merchants' advertising agreement

Confrontational strategies

A. Negative media coverage of problem bars
   1. Press releases
   2. Letters to the editor
   3. Opinion articles, editorials
B. Complaints to bar owner/manager (marketing practices, noise, service to minors and intoxicated individuals)
C. Complaints to law enforcement officials, liquor control board, city council
D. Monitoring service practices (by police or community members)
E. Threats of lawsuits
F. Demonstrations
G. Peer pressure from other bar owners, neighboring businesses.

Legal and administrative strategies

A. Enforcement of legal requirements regarding service to underage and intoxicated patrons, hours of service, fire codes
B. "Sting" operations
C. Dram shop actions
D. Liquor-license challenges
E. Nuisance-abatement actions
F. Enforcement of consumer protection laws prohibiting unfair, misleading or deceptive advertising
G. Conditional/Special Use Permits issued through the zoning process
H. Enforcement of laws against public drunkenness.

Legislative strategies

A. State laws against alcohol advertising on campus
B. Legislation to eliminate drink discounting/happy hours
C. Mandatory server training (city or state law)
D. Legislation to penalize owners for service by staff to intoxicated patrons
E. Zoning to prevent high density of licensees
F. Moratorium on new liquor licenses.

Strategies that work

In this section, we bring together the many strategies discussed in the previous chapters. The list is by no means exhaustive but provides some ideas that may work well in your community. Be creative!

Getting the word out

Whatever strategies you choose, consider ways to attract media attention to your efforts. Local media can help inform the public about your campaign, educate students and other community members, galvanize supporters and persuade policymakers.

Communicating ideas and messages will be your primary tool in raising awareness and motivating action to change bar practices. Be creative, but keep a few simple rules in mind:

- Know your audience. Speak to people in their own language about things that matter to them.
- Have a clear, consistent message. All of your campaign components should complement and reinforce each other.
- Look for opportunities to repeat your message. The effectiveness of any communication program builds over time with repeated messages.
- If there is an action you think the audience should take, say what it is.
- Ask community leaders and organizations to help communicate your message to their constituencies. People are more receptive to a message when it is delivered through a channel they know and trust.[7]

Framing: Telling your story

Present the issues in a way that allows you to define the terms of the debate. For example, bar owners may attempt to convince the public that efforts to regulate alcohol advertising interfere with their right to free speech. The debate may shift away from alcohol promotions that target students to a dispute over First Amendment rights.[8] Try to focus public and media attention on promotional practices and the problems they create for the community.

Working for Policy Change

- Establish a relationship with legislators.
- Provide your legislative allies with background statistics and anecdotes that describe the problem. Use these materials to illustrate community support and to show how the proposal would improve the situation.
- Work with legislators to draft and file legislation.
- Follow the bill's progress closely. When the legislation is reviewed at a committee hearing, be prepared to present testimony. Bring allies from districts represented by other members of the committee. Provide materials to other witnesses, the committee, and the news media covering the hearing.
- Use media contacts to publicize the legislative initiative and to gain editorial endorsements to persuade legislators to vote for your bill.

Join Together, *Save Lives! Recommendations to Reduce Underage Access to Alcohol & Action Steps for Your Community*, Boston, 1996.

Focus on the community. Talk about alcohol problems and high-risk promotions in terms of community norms, not individual behavior. If people see drinking as solely a personal rather than a social issue, support for policy-oriented approaches may decline. Distinguish designated driver programs and "Know when to say when" slogans from approaches that focus on changing marketing practices and the campus environment. Demonstrate ways in which environmental and social factors contribute to alcohol problems.

Fashion the message for your audience. Most students will not support an "anti-alcohol" movement, but they may support efforts to prevent alcohol-related *problems*. Similarly, though they may reject restrictions on free speech, many student groups will protest against sexist, demeaning or disrespectful ads.

Find interesting new ways to present the issue. Use "social math" to present data in a new and interesting way. For example, "Students at State U. drink enough beer each year to fill an Olympic-sized pool for each of our seven dorms." or "Alcohol-related vandalism costs State U more money in one year than it spends on its entire library system in 10 years."

Use humor! Develop witty quotes and media bites. Often the pithy quote will get the most attention.[9] Humor also helps to dispel the notion that you or your group are party-poopers out to ruin everyone's fun.

Media tools

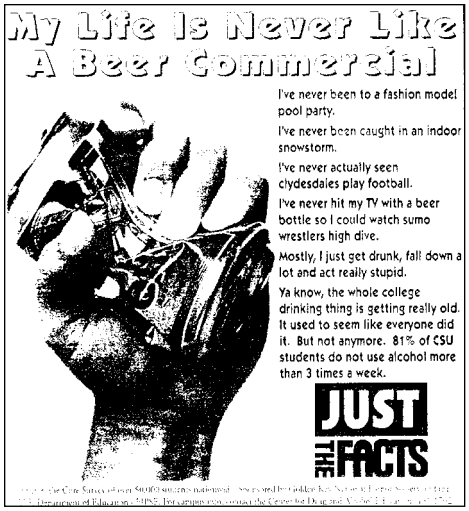
Once you have framed the message and developed several interesting ways to present the information, you're ready to go. Many groups have sponsored successful press events to promote a new initiative or to celebrate a victory and praise those who helped bring it about. Some simple ways to get your message out include letters to the editor, editorials, opinion articles, public service announcements, press releases, rallies, demonstrations and other media events.[10]

Be alert for alcohol-related national and local news stories on which to "piggy-back." For example, if a national survey makes headlines with a finding that half of all college students binge, take the opportunity to write a letter to the editor talking about marketing practices in your community that contribute to binge-drinking problems.

Better yet, time an event to coincide with the scheduled release of national or state data or prepare a press release showing how local data compare with national averages.

Celebrate!

Always be alert for the opportunity to declare victories, however small. Have a party or a press conference to announce a new policy that has resulted from your efforts. Acknowledge and thank everyone involved. In particular, praise those who may have taken a tough stand. Did one responsible bar owner facilitate meetings with other owners and convince them to sign an advertising agreement? Did a legislator stand up for your bill despite pressure from brewers or retailers? Seeing your allies praised in the local media may attract others to join future efforts.



Rocky Mtn. Collegian, Colorado State Univ., 3/7/96

A word about social marketing

Social marketing uses the media to promote changes in individual attitudes and behavior. For example, many schools now place advertisements in the student paper that provide students with accurate information about campus drinking norms. Those ads help correct exaggerated student perceptions of their peers' drinking and, as a result, may reduce the pressure that students feel to binge.[11] A media campaign promoting healthy drinking norms on campus can help create a supportive environment for policy initiatives to combat high-risk drinking promotions. Such a campaign would de-emphasize the importance of heavy drinking in the campus culture.

Conclusion and Recommendations

As you find out more about policies, practices, and attitudes in your community, tailoring a strategic plan to address specific local concerns will become easier. Form a coalition to develop localized strategies and to take action aimed at stopping bars from targeting students with irresponsible ads. Try a few of the approaches we've described, and develop some of your own. Let us know what you come up with and what results you achieve.

By following the advice provided in this guide, members of college communities can increase awareness about the relationship between marketing practices and alcohol-related problems and promote policies that stop bars from profiting at the expense of the health and safety of students and other community members. Communities will benefit from reductions in vandalism, noise, litter, sexual assault, fighting, drunk driving, and other troubles, both large and small. Academia can get on with its primary mission: the education and intellectual development of the next generation of America's leaders.

Key policy recommendations to reduce binge-drinking promotions

- Colleges, states and the federal government should adopt and enforce policies restricting alcohol advertising, as well as sponsorships and promotions by alcoholic-beverage producers, on college campuses and in college publications.
- Campus newspapers should adopt policies refusing alcohol ads that promote heavy and irresponsible drinking.
- Communities should enforce laws against sales to minors and intoxicated individuals.
- States should adopt legislation restricting all-you-can-drink specials, happy hours, ladies' nights and other drink promotions.
- Communities should use zoning ordinances and license moratoria to reduce the density of alcohol outlets around campus.

Notes

Chapter 1 *Problem? What Problem?*

1. H. Wechsler, et al, "Health and Behavioral Consequences of Binge Drinking in College," *JAMA*, v. 272, n. 21, pp 1674-5 (Dec. 7, 1994).
2. H. Wechsler & N. Isaac, "Binge Drinkers at Massachusetts Colleges: Prevalence, Drinking Style, Time Trends and Associated Problems." *JAMA*, Vol. 267, No. 21, pp. 2929-2931 (1992).
3. W.H. Honan, "Study Ties Binge Drinking to Fraternity House Life," *New York Times*, B16 (Dec. 6, 1995).
4. L.D. Johnston, et. al., National Survey Results on Drug Use from the Monitoring the Future Study, 1975-1994, University of Michigan Institute for Social Research (1995).
5. C.A. Presley, et. al., *Alcohol and Drugs on American College Campuses*, Vol. III: 1991-93, The Core Institute, Southern Illinois University at Carbondale, January 1996. [Core 1996]
6. David S. Anderson and Angelo F. Gadaleto, *Results of the College Alcohol Survey*, George Mason University Center for the Advancement of Public Health, 1994.
7. Andrea Wojtaszek, "Binge Drinking Common Practice at Richmond," *Richmond Collegian*, Feb. 1, 1996.
8. Barbara Petroff and Lisa Broek, *The University of Iowa Alcohol and Other Drug Use Assessment: Spring Semester, 1990*. Student Health Service, University of Iowa, 1990.
9. Sandra G. Boodman, "Freshman Drinking Often Leads to the ER," *Washington Post*, July 16, 1996 (Health, p. 4).
10. Core 1996.
11. National Highway Traffic Safety Administration, *Traffic Safety Facts 1995: Alcohol*.
12. U.S. Department of Education, National Center for Education Statistics, *Campus Crime and Security at Postsecondary Education Institutions*, January 1997.
13. *Substance Abuse: The Nation's Number One Health Problem, Key Indicators for Policy*. Inst. for Health Policy, Brandeis University (Oct. 1993).
14. Center on Addiction and Substance Abuse at Columbia University, *Rethinking Rites of Passage: Substance Abuse on America's Campuses*, p. 21, 1994.
15. U.S. Department of Education, National Center for Education Statistics, *Campus Crime and Security at Postsecondary Education Institutions*, January 1997.
16. Epstein, J. & Finn, P., *Preventing Alcohol-Related Problems on Campus: Vandalism*, The Higher Education Center for Alcohol & Other Drug Prevention, 1996.
17. Engs, R.C., & Hanson, D.J. Boozing & Brawling on Campus: A National Study of Violent Problems Associated With Drinking Over the Past Decade. *Journal of Criminal Justice* 22: 171-189, 1994.
18. H. Wechsler, et al., The Adverse Impact of Heavy Episodic Drinkers on Other College Students. (*J. of Studies on Alcohol* 56(6): 630 - 633, 1995).
19. Core 1996.
20. Presley, Cheryl A., Ph.D, and Philip W. Meilman, Ph.D. *Alcohol and Drugs on American College Campuses: A Report to College Presidents*, So. Illinois University (1992), p. 14.
21. Fern Shen, "These Dorms a Study in Sobriety," *Washington Post* (September 3, 1996, A1).
22. Ibid.
23. Core 1996.
24. Baer, JS; Sacy, A; & Larimer, M. Biases in the perception of drinking norms among college students. (*J. of Studies on Alcohol* 52(6):580-586, 1991).

Chapter 2 *Advertising and Marketing to the College Student*

1. Lewis Eigen, *Alcohol Practices, Policies, and Potentials of American Colleges and Universities: An OSAP White Paper* (Rockville, MD: US Dept of Health and Human Services, OSAP, 1991).
2. *Jobson's Beer Handbook 1995*, Jobson Publishing Corp. (New York).
3. "A New Prohibition," *Newsweek on Campus*, April 1985, pp 7-13.
4. U.S. Department of Education, National Center for Education Statistics, IPEDS "Fall Enrollment" and "Institutional Characteristics" surveys, 1995. Tuition, room, and board for in-state students at *public* universities average 14% of median family income.
5. Eigen, *Alcohol Practices, Policies, and Potentials of American Colleges and Universities.*
6. Bonnie Wilford & Jacqueline Morgan, *Alcohol Advertising and Marketing: Consumer and Government Involvement*, Intergovernmental Health Policy Project, George Washington University, November 1992.
7. C. Reidy, "Questions Arise on Liquor Marketing: Firms deny targeting hub with its large student population," *Boston Globe* (Apr. 6, 1995).
8. Barbara E. Ryan and James F. Mosher, *Progress Report: Alcohol Promotion on Campus*, Marin Institute for the Prevention of Alcohol and Other Drug Problems (San Rafael, CA, Nov. 1991).
9. C. Reidy, "Questions Arise on Liquor Marketing: Firms deny targeting Hub with its large student population," *Boston Globe*, April 6, 1995.
10. Advocacy Institute, *Raising More Voices Than Mugs: Changing the College Alcohol Environment Through Media Advocacy*, 1994.
11. Breed, et al, "Alcohol Advertising in College Newspapers: A 7-Year Follow-Up," *JACH*, Vol. 38, p. 255 (May 1990).
12. A description of survey methodology and findings is available from CSPI.
13. Breed, et al, and CSPI supra.
14. Although it has not advertised extensively in the past, Sidney Frank Importing Co. recently announced a $1 million television campaign for Jaegermeister on local stations and regional cable channels in New York, California and Nevada. Manu, D., "Premium Spirits Volumes Rise in 1996, As Long-Running US Decline Is Broken," *Impact*, vol. 26, no. 24 (Dec. 15, 1996).
15. "'Hot Brands' Bring Excitement to Alcoholic Beverage Market," *Impact*, vol. 25, nos. 5 &6, March 1 & 15, 1995.
16. Hwang, S., "College-Age Drinkers Do Shots in Flavors That Pack a Wallop," *Wall Street Journal*, May 13, 1994.
17. Grein, P., "Suds 'n' Bucks 'n' Rock 'n' Roll," *Los Angeles Times*, July 30, 1989.

Chapter 3 *Standards for Alcohol Marketing On Campus*

1. *Model House Policies*, Responsible Beverage Service (R.B.S.) Council Standards Committee. The R.B.S. Council is an international membership association of the Responsible Hospitality Institute. It was established in 1987.
2. Beer Institute World Wide Web Page <www.beerinst.org>, Education: College Programs (December 1996).
3. Debra Leach, Executive Director, National Licensed Beverage Association, personal communication (May 14, 1996).
4. "Century Council Ad/Marketing Code With [*sic*] Stifle Many Beer Provisions," *Kane's Beverage Week* 52 (21), May 27, 1991.
5. Ryan & Mosher, *Progress Report: Alcohol Promotion on Campus.*

6. Numerous examples of college and university alcohol policies have been posted on the World Wide Web by the Higher Education Center for Alcohol and Other Drug Prevention <http://www.edc.org/hec/> and the George Mason University Center for Health Promotion <gopher://vision.gmu.edu:70/11/.college/.policy>. For the alcohol policy of a specific institution, check that school's home page or contact the student affairs office.
7. National Commission on Drug-Free Schools, *Toward a Drug-Free Generation: A Nation's Responsibility* (Final Report, September 1990). Lauro F. Cavazos (then-Secretary of Education) and William J. Bennett (then-Director of the Office of National Drug Control Policy) co-chaired the Commission.
8. David S. Anderson, Ph.D., Associate Research Professor, Center for Health Promotion, George Mason University, and Angelo F. Gadaleto, Ph.D., Professor, Department of Counselor, Secondary, and Professional Education, West Chester University. Results of the 1994 *College Alcohol Survey*: Comparison with 1991 results and baseline year.
9. Derived from Anderson and Gadaleto (ibid.). These figures differ from those in the survey report, which lists the percentage of schools *with policies* addressing sponsorship/promotion that prohibit these activities. This table charts the percentage of *all responding schools* which prohibit sponsorships or promotions. These questions appeared for the first time in the 1991 survey.
10. See, Gerardo M. Gonzalez, "Alcohol Policy Development: A Necessary Component for a Comprehensive Alcohol Education Program on Campus," in Joan S. Sherwood (ed.), *Alcohol Policies and Practices on College and University Campuses* (NASPA, 1987).
11. W. DeJong & S. Langenbahn, *Setting and Improving Policies for Reducing Alcohol and Other Drug Problems on Campus: A Guide for School Administrators* (Higher Education Center for Alcohol and Other Drug Prevention,1995).
12. Ibid.
13. Goldberg, S., "Plan to ban liquor ads on campuses causes stir," *Detroit Free Press*, A3 (2/19/85).
14. Ibid.
15. Michigan R 436.1861(1)(a) and (b) (effective Jan. 1, 1986).
16. Michigan R 436.1861(2)(a).
17. Michigan R 436.1861(2)(d) and (e), as explained in Oct. 22, 1985 letter from Daniel L. Sparks, Director, Office of Executive Services, Michigan Liquor Control Commission to licensees.
18. Wash. Rev. Code § 66.28.160 (1996).
19. 3 VAC 5-20-40.B.3 (1996).
20. Ibid.
21. 3 VAC 5-20-40.B.5 (1996).
22. 3 VAC 5-20-100.B.1 (1996).
23. 3 VAC 5-20-100.B.9 (1996).
24. Utah Admin. R. 81-1-17.11(j)(iv) (1996).

Chapter 4 *Selling Drinks: Rules of the Game*

1. Every effort has been made to ensure the accuracy of the information contained in this section. Laws and administrative regulations change frequently, however. Identical language may be interpreted and enforced quite differently from state to state or even from county to county. We encourage readers to contact their local liquor control board or police department to learn about specific laws in their communities.
2. D. Fernandez, "Last call looking more likely for happy hour drink deals," *Orlando Sentinel*, Feb. 24, 1997.

3. New Hampshire Rev. Stat. Ann. § 179:31(XVI) (1994).
4. D. Fernandez, "Last call looking more likely for happy hour drink deals," *Orlando Sentinel*, Feb. 24, 1997.
5. 16 Texas Admin. Code § 45.103(h)(5) (1996).
6. 204 Code Mass. Reg. § 2.04(1) (1993).
7. West's Maine Rev. Stat. Ann. § 28-A-709.1.A(5) (1995 pocket part).
8. §471.412.
9. A.J. McKnight, "Factors Influencing the Effectiveness of Server-Intervention Education, *J. Stud. Alcohol* 52(5): 389-397 (1991).
10. D. Levy & T. Miller, *A Cost-Benefit Analysis of Increased Enforcement to Reduce Serving Intoxicated Patrons*. University of Baltimore and the Urban Institute (1992).
11. A.J. McKnight and F.M. Streff, "The Effect of Enforcement Upon Service of Alcohol to Intoxicated Patrons of Bars and Restaurants," *Accident Anal. & Prev.*, Vol. 26, No. 1, pp 79-88 (1994).
12. Ibid.
13. Todd Plate, "There Will Be No Krawling at the Pub Krawl," *The Daily Aztec*, April 25, 1996.
14. A.J. McKnight and F.M. Streff, "The Effect of Enforcement Upon Service of Alcohol to Intoxicated Patrons of Bars and Restaurants," *Accident Anal. & Prev.*, Vol. 26, No. 1, pp 79-88 (1994).
15. H.D. Holder and A.C. Wagenaar, "Mandated Server Training and Reduced Alcohol-Involved Crashes: A Time Series Analysis of the Oregon Experience," *Accident Anal. and Prev.*, Vol. 26, No. 1, pp. 89-97, 1994.
16. B. Howard-Pitney, et al, "Responsible Alcohol Service: A Study of Server, Manager, and Environmental Impact, *American J. Public Health*, Vol. 81, No. 2, pp. 197-199, 1991.
17. The following states *do not* recognize dram shop liability as a legal cause of action: Arizona, Delaware, Kansas, Maryland, Nebraska, Nevada, and Virginia. Digest of State Alcohol-Highway Safety Related Legislation, U.S. Department of Transportation National Highway Traffic Safety Administration, Thirteenth Edition (Jan. 1, 1995).
18. "The Model Alcoholic Beverage Retail Licensee Liability Act of 1985," *Western State Law Review*, Vol. 12, No. 2 (Spring 1985).
19. J.F. Mosher and V.J. Colman, "Prevention Research: The Model Dram Shop Act of 1985," *Alcohol Health and Research World*, Vol. 10(4) (Summer 1986).
20. B. Brown, "Bar Owners Request Review of Laws," *Daily Iowan*, Feb. 12, 1997.
21. California Business and Professional Code § 25658.1(b).

Chapter 5 *Local Action to Clean Up the Bar Scene*

1. States differ in the amount of authority over liquor licensing and alcoholic beverage control delegated to local jurisdictions. Check with your local alcoholic beverage control board or the state liquor control authority to determine the regulatory authority of each level of government in your area.
2. The process described in this section was derived from F.D. Wittman & R. Burhenne, *Planning, Zoning & Alcohol Outlets in San Diego: Community Planning for the Prevention of Alcohol Problems* (1985).
3. "Alcohol Availability and Alcoholism," *JAMA*, Vol. 274, No. 23, p. 1832 (1995); R.A. Scribner, et al, "The Risk of Assaultive Violence and Alcohol Availability in Los Angeles County," *Am. J. Pub. Health* Vol. 85, No. 3, pp 335-340 (1995).
4. F.J. Chaloupka & H. Wechsler, "Binge Drinking in College: The Impact of Price, Availability, and Alcohol Control Policies," *Contemporary Economic Policy*, Vol. XIV, pp 112-124 (Oct. 1996).

5. E.g., California Constitution, Art. XX, § 22. California has not delegated authority to local jurisdictions to act on issues related to liquor licensing and preempts local action to a greater extent than other states.
6. J.F. Mosher & R.M. Works, *Confronting Sacramento: State Preemption, Community Control and Alcohol-Outlet Blight in Two Inner-City Communities*, Marin Institute for the Prevention of Alcohol and Other Drug Problems (San Rafael, CA, 1994).
7. I. Jones, "Industry Fears Oakland Liquor Ordinance May Set Precedent," *Food & Drink Daily*, Vol. 3, No. 596 (August 23, 1993).
8. J. Epstein, "Town & Gown," *Catalyst*, Vol. 1, No. 2 (Higher Education Center for Alcohol and Other Drug Prevention, 1995).
9. T.L. Gebhardt and J. Ellis, *Town-Gown Relations: The Committee on University and Community Relations*, 1996 National Meeting on Alcohol, Other Drugs and Violence Prevention in Higher Education (Oct. 1996).

Chapter 6 *Putting It All Together*

1. For a comprehensive review of this process and useful forms to help guide and track your efforts, see B.E. Ryan, T. Colthurst, & L. Segars, *College Alcohol Risk Assessment Guide: Environmental Approaches to Prevention* (1994). Available from the National Clearinghouse for Alcohol and Drug Information, (800) 729-6686.
2. A.H. Goodwin & K. Dude. *Drink Specials, Alcohol Consumption, & Alcohol-Related Problems: A Survey of College Students*. University of Missouri-Columbia, unpublished manuscript, 1996.
3. F.M. Harding, *Networking for Healthy Campuses: NYS College Alcohol and Other Drug Abuse Prevention Programs*, New York State Office of Alcoholism and Substance Abuse Services (1996).
4. Join Together. *Leading from the Ground Up* (Boston, 1996).
5. Center for Substance Abuse Prevention. *Teen Drinking Prevention Program: Community Action Guide* (1995).
6. B.E. Ryan, T. Colthurst, and L. Segars, *College Alcohol Risk Assessment Guide: Environmental Approaches to Prevention*, UCSD Extension, University of California-San Diego, 1994.
7. Center for Substance Abuse Prevention. *Teen Drinking Prevention Program: Community Action Guide* (1995).
8. B.E. Ryan, T. Colthurst, and L. Segars, *College Alcohol Risk Assessment Guide*.
9. Ibid.
10. For sample news releases, letters to the editor, and opinion articles and for additional tips on working with the media, see H. Richardson, *Raising More Voices Than Mugs: Changing the College Alcohol Environment Through Media Advocacy* or the Center for Substance Abuse Prevention's *Teen Drinking Prevention Program: Communicator's Guide* (DHHS Publication No. (SMA) 95-3026). Both are available from the National Clearinghouse for Alcohol and Drug Information, (800) 729-6686.
11. "NIU Attacks Binge Drinking via Students' Perceptions," *National On-Campus Report*, vol. 24, no. 23 (Dec. 2, 1996).

Inter-Association Task Force on Alcohol and Substance Use

Guidelines for Beverage Alcohol Marketing on College and University Campuses

1. Alcohol beverage marketing programs specifically targeted for students and/or held on campus should conform to the code of student conduct for the institution and should avoid demeaning sexual or discriminatory portrayal of individuals.

2. Promotion of beverage alcohol should not encourage any form of alcohol abuse nor should it place emphasis on quantity or frequency of use.

3. Beverage alcohol (such as kegs or cases of beer) should not be provided as free awards to individual students or campus organizations.

4. No uncontrolled sampling as part of campus marketing programs should be permitted and no sampling, or other promotional activities, should include "drinking contests."

5. Where controlled sampling is allowed by law and institutional policy, it should be limited as to time and quantity. Principles of good hosting should be observed including availability of alternative beverages, food, and planned programs. The consumption of beer, wine, or distilled spirits should not be the sole purpose of any promotional activity.

6. Promotional activities should not be associated with otherwise existing campus events or programs without the prior knowledge and consent of appropriate institutional officials.

7. Display or availability of promotional materials should be determined in consultation with appropriate institutional officials.

8. Informational marketing programs should have educational value and subscribe to the philosophy of responsible use of the products represented.

9. Beverage alcohol marketers should support campus alcohol awareness programs that encourage informed and responsible decisions about the use or non-use of beer, wine, or distilled spirits.

10. If permitted, beverage alcohol advertising on campus or in institutional media, including that which promotes events as well as product advertising, should not portray drinking as a solution to personal or academic problems of students or as necessary to social, sexual, or academic success.

11. Advertising or other promotional campus activities should not associate beverage alcohol consumption with the performance of tasks that require skilled reactions such as the operation of motor vehicles or machinery.

12. Local off-campus promotional activities, primarily directed to students, should be developed with the previous knowledge of appropriate institutional officials.

Selected State Laws & Regulations Prohibiting Alcohol Promotions*

	Unlimited drinks at 1 price	2 or more drinks at 1 price	Happy hours	Ladies Nights	Increasing alc. vol. w/o increasing price proportionately	Other
Alabama Admin. Code	20-X-6-.14(1)(a)	20-X-6-.14(1)(b)	After 9pm	20-X-6-.14(1)(c)	20-X-6-.14(1)(d)	
Alaska Statutes	4.16.015(a)(4)		4.16.015(a)(3)	4.16.015(a)(5)		Free drinks. 4.16.015(a)(1)
Arizona Rev. Stat.	Art. 3 4-244.24					
Illinois 235 ILCS	5/6-28(b)(2)		5/6-28(b)(3)	5/6-28(b)(3)	5/6-28(b)(4)	
Indiana Stat. Ann.		7.1-5-10-20(a)(3)	7.1-5-10-20(a)(1)			
Kansas Stat. Ann.	41-2640(1)(3)		41-2640(1)(4)	41-2640(a)(4)	41-2640(a)(5)	Free drinks. 41-2640(a)(1). Selling drinks at less than cost. 41-2640(a)(2)
Maine Rev. Stat. Title 28-A	709.1.A(3)					Free drinks. 709.1.A(1). Any other practice the specific purpose of which is to encourage customers to drink to excess. 709.1.A(5)
Michigan Admin. Code	R436.1438(1)	R436.1438(2)				
Nebraska Rev. Stat.	019.01U1	019.01U2				
New Jersey Admin. Code	13:2-23.16(a)(1)	13:2-23.16(a)(2)				
North Carolina Admin. Code Title 4	2S.0232(a)(1)	2S.0232(a)(1)	2S.0232(b)	2S.0232(b)		Free drinks. 2S.0232(b)
Ohio Admin. Code	4301:1-1-50 (A)(1)(b)	4301:1-1-50 (A)(1)(a)	After 9 pm 4301:1-1-50 (B)	After 9 pm 4301:1-1-50 (A)(1)(c)	4301:1-1-50 (A)(3)	
Oklahoma Stat. Ann. Title 37	537(B)(4)(c)	537(B)(4)(b)	537(B)(4)(b)	537(B)(4)(b)	537(B)(4)(e)	
Pennsylvania Liquor Board Reg. Subchapter C	13.102(a) (3)	13.102(a) (1)	After 12 a.m. or >2 consecutive hrs. 13.102(a)	After 12 a.m. or >2 consecutive hrs. 13.102(a)	13.102(a) (2)	Ladder pricing, beat-the-clock, bladder busts. 13.102(a) (4)
Rhode Island Gen. Laws	3-7-26(a)(3)	3-7-26(a)(1)			3-7-26(a)(2)	Advertising or promoting happy hours, 2-for-1 nights, or free drink specials. 3-7-26(b)
South Carolina Code Ann.		61-13-875	Except 4-8 pm 61-13-875	Except 4-8 pm 61-13-875		Selling drinks for less than half the regular price. 61-13-875
Tennessee ABC Rules Ch. 100-1 TCA 51-1-209	if actual cost exceeds the fixed price.(15)(b)	after 10 pm (16)(b)	after 10 pm (16)(b)	after 10 pm (16)(b)	after 10 pm (16)(c)	
Texas Admin. Code Title 16	45.103(c)(3)	45.103(c)(1)	After 11 pm 45.103(b)	45.103(h)(3)	45.103(c)(5)	Cover charges for penny drinks or drinks for "any coin." 45.103(h)(5)
Virginia Admin. Code Title 3	5-50-160.B.7	5-50-160.B.4	After 9 pm 5-50-160. B.1		5-50-160.B.3	Free drinks. 5-50-160.B.6. Print or broadcast ads referring to "Happy Hour" or similar terms. 5-20-40.A.3

* As of November 1996.

Proposed Ordinances Requiring Licensee Compliance Checks and Server Training*

1. General license restrictions: Responsibility of licensee, right to search, and compliance checks

The City shall hold every licensee responsible for the conduct of his or her place of business and the conditions of sobriety and order in it, as required by Minnesota Statute Section 340A.501. The act of any employee of the licensed premises authorized to sell intoxicating liquor there is deemed the act of the licensee as well, and the licensee shall be liable for all penalties provided by this ordinance equally with the employee, except criminal penalties.

Section 1. Requirements.

The issuing authority and/or the City Police Department shall:
(a) Have, as a condition of the license, the right to enter, inspect, and search the licensed premises without a search and seizure warrant during the hours in which the licensed premises are open for the sale of alcoholic beverages; and
(b) Conduct at least two (2) compliance checks each year, and shall issue citations to any licensee violating the provisions of their license or any relevant provisions of Minnesota Statute §340A.

2. Server training

Section 1. Licensees.

(a) All persons licensed under [insert citation to non-temporary liquor license ordinances] shall attend all mandatory liquor license training seminars required by the city. If the license is in the name of an entity other than an individual person, a person or persons must be designated to attend the seminar on behalf of the licensee. This designee must have the authority to set, implement or change the licensee's practices for selling and serving alcohol.
(b) All persons applying for a temporary liquor license under [insert citation to temporary liquor license ordinance] and all persons employed by them in selling, serving or managing the selling or serving of alcohol shall have completed a city approved server education class or liquor license training seminar within two (2) years prior to the issuance of the temporary liquor license.
(c) All persons licensed under [insert citation to non-temporary liquor license ordinance] who are engaged in the selling or serving of alcoholic beverages or the managing thereof, shall complete a city approved server education class:
(1) Within ninety (90) days of beginning such activities; and
(2) Every other year thereafter unless probationary extension is granted for hardship reasons.
(d) All persons licensed under [insert non-temporary liquor license ordinances] shall require all their employees who are engaged in selling or serving of alcoholic beverages or the managing thereof, to complete a city approved server education class:
(1) Within ninety (90) days of beginning such activities; and
(2) Every other year thereafter unless probationary extension is granted for hardship reasons.
OR

(d) All persons licensed under [insert citation to non-temporary liquor license ordinances] shall require all their employees who are engaged in the selling, serving, delivering, or managing the selling or serving of alcohol to obtain a license under the [insert citation to server license ordinance].

Section 2. Penalties.

The penalties for violation of this section shall be as follows:
a) For the first violation, a fine not exceeding fifty dollars ($50).
b) For subsequent violations, a fine not exceeding seven hundred dollars ($700) and suspension of the licensee's liquor license for thirty (30) days.

* From L. Bosma, et al., Model Local Alcohol Control Ordinances, University of Minnesota, 1995.

Tavern-Owner Advertising Agreement

Albany Committee on University & Community Relations

I/we, the undersigned, representing the specific establishment written below, agree beginning with the date below to review the content of any and all advertising with the intention to promote: (1) the responsible and lawful consumption of alcoholic beverages and (2) appropriate as well as civil behavior when leaving my establishment. I/we also agree to comply with attached current policies and regulations concerning the posting and distribution of advertisement for the City of Albany (NYS Penal Code, Section 145.30 and Unlawful Posting Advertisements and Handbill Ordinance, City of Albany), the University at Albany, State University of New York and the College of Saint Rose. If I am/we are not aware of other policies, I/we will seek out written information concerning these guidelines.

Specifically, I/we will fashion our advertising as follows:

(1) Include a statement asking all my patrons to behave responsibly and in a civil manner in the surrounding neighborhood when leaving my establishment. For example, "Please remember to be a good neighbor and behave appropriately when leaving our establishment." or "Responsible patron behavior when leaving encouraged."

(2) Emphasize the necessity of being 21 years of age or older and possessing the appropriate valid means of identification to prove such at my establishment if one wishes to consume alcoholic beverages. For example, "Valid forms of identification verifying age of 21 years or older required to consume alcohol." or "Appropriate proof required."

(3) Avoid terminology which promotes the irresponsible consumption of alcoholic beverages. For example, the following would be viewed as promoting the overindulgence and irresponsible consumption of alcoholic beverages:

- "Toxic Thursdays"
- "Progressive Pitchers"
- "Free Beer"
- "Sponsored by Drinkers Unlimited"
- "Penny 'Til You Pee Beer Specials"

(4) Promote and advertise non-alcoholic beverage and food specials as much as alcoholic beverage specials.

A sheet of logos denoting your establishment as a "Cooperating Tavern" are attached for use in your advertisements. A sign for posting in your tavern is also included.

Name of Establishment: _____

Address: _____

_____

_____

Signature(s) **Printed Name/Title** **Date**

_____

INFORMATION RESOURCES

Center for Science in the Public Interest, Alcohol Policies Project, 1875 Connecticut Avenue, N.W., Washington, DC 20009-5728, (202) 332-9110, ext. 385, (202) 265-4954 (fax), http://www.cspinet.org. Contact the Alcohol Policies Project or visit our website for information about policies to prevent alcohol-related problems, action alerts, and details about alcohol industry representatives and industry-sponsored organizations active on college campuses.

Federal Government

Center for Substance Abuse Prevention (CSAP), Substance and Mental Health Services Administration, Rockwall II, 5600 Fishers Lane, Room 800, Rockville, MD 20857, (301) 443-0373.

Department of Education: The U.S. Department of Education offers a variety of publications on-line at http://www.ed.gov. The Department's National Center for Education Statistics provides on-line data concerning a variety of campus issues at http://www.ed.gov/NCES. The Fund for the Improvement of Postsecondary Education (FIPSE) in the Office of Postsecondary Education offers materials that support prevention activities on campus, descriptions of funded programs, and evaluation materials. Drug Prevention Programs, 7th & D Streets, SW, Washington, DC 20202-5175, (202) 708-5750.

National Clearinghouse for Alcohol and Drug Information (NCADI): The nation's largest repository of audiovisual and print materials concerning substance abuse. Free fact sheets, resource guides, posters, statistics, grant information, and data-base searches on request. P.O. Box 2345, Rockville, MD 20847-2345, (800) 729-6686, (301) 468-2600 (in Metropolitan Washington, DC), (301) 468-6433 (fax). On-line access to NCADI services is also available through PREVline (see on-line sources).

State and Local Government

Alcohol Beverage Control Board/ Liquor Control Commission: Responsible for administering state liquor control laws. In "control" states, these offices manage the sale of alcoholic beverages, which are sold through special state-run stores.

Chamber of Commerce: Information about the general business climate in the community, as well as specific requirements (licenses, permits, etc.) for area businesses.

City/County Council: Your city or county council representative should be able describe recent legislative initiatives and direct you to local ordinances governing alcohol sales.

Drug and Alcohol Agency: Implements state alcohol and drug prevention and treatment priorities and administers state and federal funds, particularly those from the Substance Abuse and Mental Health Services Administration (SAMHSA). Headed by the state drug program coordinator, the state's agency may be located within the state department of health, social or rehabilitative services.

Police Department: Your state and local police departments may have statistics on the involvement of alcohol in various crimes; arrests for crimes such as vandalism, drunk driving, and sexual assault; and citations made by police officers for underage drinking and sales to underage or intoxicated patrons.

Regional Alcohol and Drug Awareness Resource (RADAR) Network Agency: This program distributes alcohol and drug abuse

prevention and education materials at the state and local level. Information activities are coordinated nationally by the National Clearinghouse for Alcohol and Drug Information (NCADI). For the RADAR agency nearest you, contact NCADI at (800) 729-6686.

State Education Department: The office of the state superintendent of education may have surveys of student alcohol use or information on the amount of money spent on prevention in public institutions.

State Health and Mental Health Departments: These departments may be a good source of information concerning alcohol's toll on families. They should be able to provide information on a variety of consequences of alcohol consumption including Fetal Alcohol Syndrome (FAS), domestic violence, and deaths attributable to alcohol-related causes, such as falls, drownings, and suicides.

State Legislature: Your state senator or representative should be able to direct you to any recent legislation on alcohol marketing practices. Most state legislatures have research offices, but these may have to be accessed through your representatives.

Uniform Crime Reports (UCR) contact: The state UCR office is responsible for assembling state offense, arrest, and other crime statistics. The UCR office should have data on the number of alcohol-related crimes in your state and city. The contact may be located in the justice department, department of corrections or department of public safety. Similar information should also be available from state and local law enforcement agencies.

Zoning Control Board/City Planning Department: Your local agency responsible for zoning decisions and land use planning should be able to provide information about requirements specific to alcohol outlets, as well as general business requirements that also govern establishments that sell alcohol.

Resources On Campus

Campus police: Campus law enforcement officials track and report data about crimes that occur on-campus.

Dean of Students/Student Affairs Office: Contact this office for information on campus alcohol policies, bulletin board posting policy, and campus activities.

Greek Coordinator: The campus administrator responsibe for fraternity and sorority affairs may have information about alcohol problems within the greek system and may be able to identify potential allies within that system.

Judicial Affairs Director: Judicial affairs officers should be able to provide data on alcohol-related suspensions, expulsions, and violations of the student code of conduct.

Prevention/Health Specialist: Most campuses now have a specialist in alcohol and other drug prevention. Contact this individual for information about prevention activities, peer counseling, and alcohol problems on campus.

Residence Life Office: This office should have information about alcohol problems in residence halls, availability of and demand for substance-free housing, and the campus policy regarding drinking and alcohol advertising in traditional residence halls.

Student Government: Student government officials may have information about past efforts to change the campus alcohol policy and about students or groups involved in alcohol issues.

Student Health Services: The student health service should track the incidence of alcohol-related injuries, alcohol poisoning,

health problems, and sexually transmitted diseases.

Student Newspaper: Contact the editorial board or the newspaper's faculty advisor for information about the paper's policies regarding alcohol advertising, coverage of events involving alcohol, and publication of letters or opinion pieces by community members.

Resource Organizations

Alcohol Epidemiology Program, University of Minnesota School of Public Health: Website contains model alcohol control ordinances and journal articles on underage drinking prevention and other alcohol policy issues at http://www.epi.umn.edu. For more information, call (800) 774-8636 or 612-626-3500 or e-mail wick@epivax.epi.umn.edu.

Core Institute: Southern Illinois University institute provides nationwide data on alcohol and drug use on college campuses. The Core Survey and national survey results may be downloaded from the institute's website at http://www.siu.edu/~coreinst/. For more information, call (618) 453-4366 or e-mail coreinst@siu.edu.

Drug Abatement Research Discussion Group (DRUGHIED): Listserve (e-mail) discussion of campus prevention issues. Previous messages to the listserve may be viewed at the Higher Education Center's website (listed below). To subscribe, e-mail LISTSERV@TAMVM1.TAMU.EDU. Your message should contain only: subscribe DRUGHIED.

Higher Education Center for Alcohol & Other Drug Prevention: A resource center for colleges and universities established by the Department of Education, the Center offers information services, technical assistance, training, publications, and national meetings. Website offers publications, examples of college alcohol policies, and links to other resources and campus websites. Higher Education Center for Alcohol & Other Drug Prevention, 55 Chapel Street, Newton, MA 02158, 1-800-676-1730, http://www.edc.org/hec.

Join Together: Available on the Internet via most computer networks, Join Together Online keeps advocates aware of substance abuse news, technical assistance, funding news and public policy developments. For further information, contact Join Together, 441 Stuart Street, Boston, MA 02116, (617) 437-1500, (617) 437-9394 (fax). E-mail info@jointogether.org. World Wide Web users contact http://www.jointogether.org.

Marin Institute for the Prevention of Alcohol and Other Drug Problems: Searchable online database with citations and abstracts of articles about the alcoholic beverage industry, alcohol policy, and prevention efforts. Links to prevention and industry websites. Marin Institute, 24 Belvedere Street, San Rafael, CA 94901, (415) 456-5692, http://www.marininstitute.org.

PREVline: This on-line service provides information concerning alcohol, tobacco, and other drug problem prevention. PREVline is a service of the Center for Substance Abuse Prevention (CSAP). PREVline can be accessed through the Internet via telnet (ncadi.health.org — press ENTER, User-ID: new) or via telephone to: (301) 770-0850, User-ID: new.) In addition, it can be accessed through many commercial data services (GOPHER: gopher.health.org; World Wide Web: http://www.health.org; FTP: ftp.health.org). For further information about PREVline, contact NCADI, (800) 729-6686.

Project Cork Institute: Online database of substance abuse information, resource materials, and bibliographies available on the World Wide Web at http://www.dartmouth.edu/~cork/. Project Cork Institute, Dartmouth Medical School,

14 S. Main Street, Suite 2F, Hanover, NH 03755, (603) 646-3935. E-mail project.cork@dartmouth.edu.

Quick Facts: Provides free access to the most current data from the Alcohol Epidemiologic Data System (AEDS) of the National Institute on Alcohol Abuse and Alcoholism (NIAAA). Features data tables and text information on alcohol issues and trends including per capita consumption, economic costs, tax revenues, and alcohol-related illnesses and mortality. Information is available to anyone with a computer and a modem, using the following specifications: BBS number (202) 289-4112; Modem settings 2400 or lower bps, N, 8, 1. AEDS , c/o Cygnus Corporation, 1400 Eye Street, N.W., Suite 1275, Washington, DC 20005, (202) 289-4992.

Security on Campus, Inc.: On-line database including campus crime statistics, legislative information and links to campus law enforcement websites at http://www.soconline.org. Security on Campus, 215 West Church Road, Suite 200, King of Prussia, PA 19406-3207, (610) 768-9330, e-mail soc@soconline.org.

VISION: George Mason University's Center for Health Promotion maintains this site, which includes "Promising Practices: Campus Alcohol Strategies," descriptions of community- and campus-based prevention programs, and examples of campus alcohol policies. Access via the World Wide Web at http://vision.gmu.edu and by gopher at gopher://vision.gmu.edu:70. Center for Health Promotion, MS 1F5, George Mason University, Fairfax, VA 22030, (703) 993-3697.

Other Resource Organizations

American College Health Association, P.O. Box 28937, Baltimore, MD 21240-8937, (410) 859-1500.

Center on Addiction and Substance Abuse (CASA) at Columbia University, 152 West 57th Street, New York, NY 10019, (212) 841-5200, http://www.casacolumbia.org.

Community Anti-Drug Coalitions of America (CADCA), 701 North Fairfax, Alexandria, VA 22314, (703) 706-0563.

FACE Project, Mid-State Substance Abuse Commission, 105 W. Fourth Street, Clare, MI 48617, (517) 386-2315 (phone), (517) 386-3532 (fax), http://FACEproject.org.

North American Partnership for Responsible Hospitality, 4113 Scotts Valley Drive, Scotts Valley, CA 95066, (408) 438-1404 (phone), (408) 438-3306 (fax), NAPRH@aol.com (e-mail).

Publications and Presentations

Alcohol and Drugs on American College Campuses: Use, Consequences, and Perceptions of the Campus Environment: Provides analysis and statistics from the Core Alcohol and Drug Survey. The Core Institute, Student Health Program, Southern Illinois University, Carbondale, IL 62901, (618) 453-4366.

Binge Drinking on American College Campuses: A New Look at an Old Problem: Information about the extent of binge drinking by American college students, demographic characteristics of binge drinkers, consequences for bingers, and "second hand" effects of binge drinking. Available from the Harvard School of Public Health, College Alcohol Study, Department of Health and Social Behavior, 677 Huntington Avenue, Boston, MA 02115. A bulletin summarizing survey results, *Binge Drinking on Campus: Results of a National Study is available from the Higher Education Center for Alcohol & Other Drug Prevention*, 55 Chapel Street, Newton, MA 02158, (800) 676-1730, http://www.edc.org/hec.

College Alcohol Risk Assessment Guide: Environmental Approaches to Prevention: This guide provides tools for information gathering about campus alcohol-related problems and the campus environment, data analysis, response/ strategies to reduce problems, and assessment of prevention activities. Available from the National Clearinghouse for Alcohol and Drug Information, (800) 729-6686.

College Alcohol Survey: Conducted every three years since 1979, asks administrators at four-year colleges and universities about alcohol and other drug policies, programs, and problems. Other resources include *Drug and Alcohol Survey of Community, Junior, and Technical Colleges and Promising Practices* guide to innovative campus prevention programs. David Anderson, George Mason University Center for Health Promotion, Fairfax, VA 22030, (703) 993-3697.

Jean Kilbourne, 51 Church Street, Boston, MA 02116, (617) 482-3593 (phone), (617) 426-8019 (fax). Lecture and film programs include: *The Naked Truth: Advertising's Image of Women, Under the Influence: The Pushing of Alcohol via Advertising*, and *Alcohol Advertising: Calling the Shots*.

National Survey Results on Drug Use from the Monitoring the Future Study, Vol. 2: College Students and Young Adults: Available from the National Clearinghouse for Alcohol and Drug Information, (800) 729-6686.

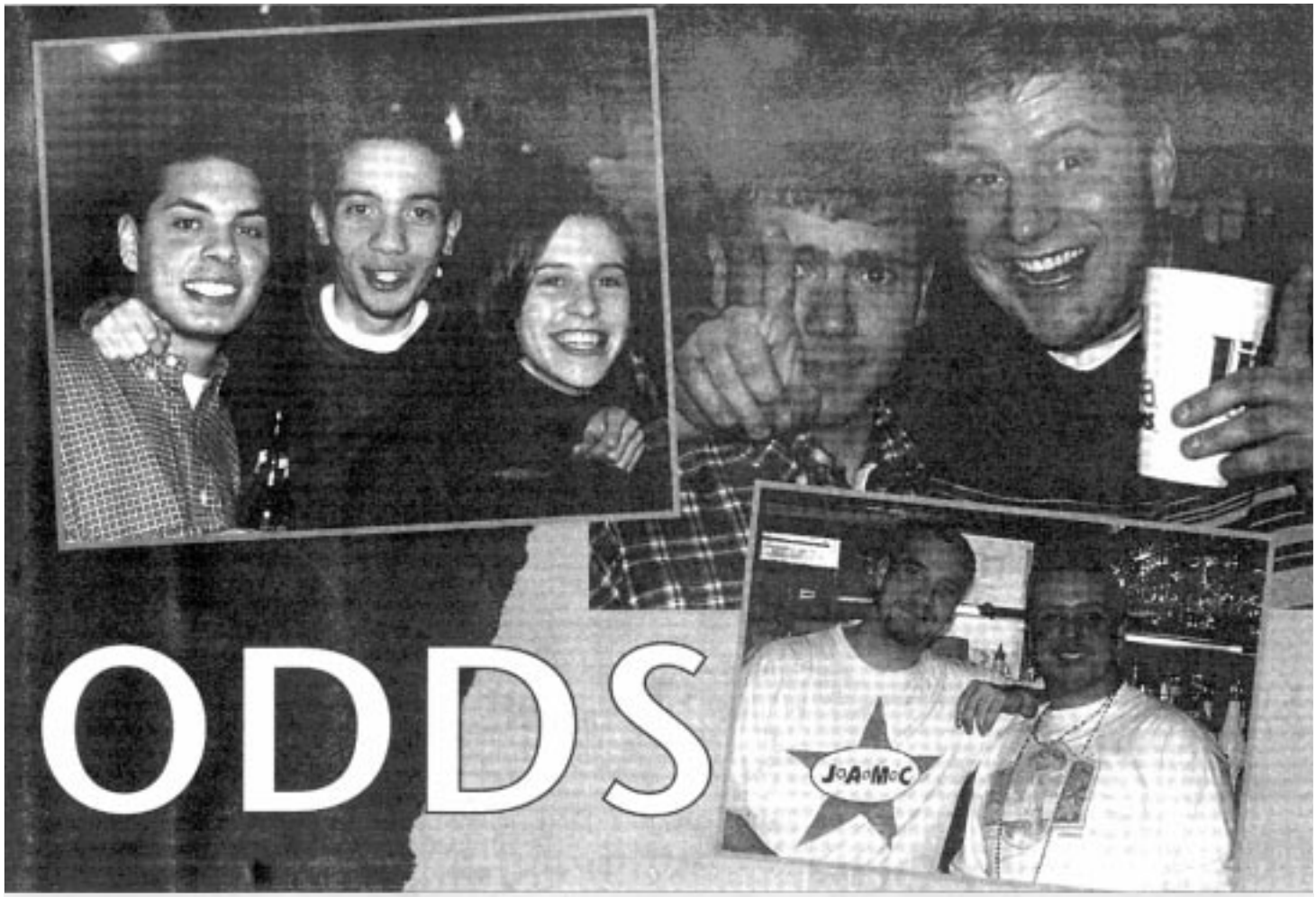
Networking for Healthy Campuses describes a public health approach to preventing alcohol and other drug problems on campus and provides step-by-step instructions to conducting a campus needs assessment, developing goals and objectives, implementing and publicizing prevention programs, and evaluating the programs. Available by writing to the New York State Office of Alcoholism & Substance Abuse Services (OASAS), Bureau of Communications and Community Relations, 1450 Western Avenue, Albany, NY 12203-3526.

Prevention File, a quarterly magazine, reportso n current research, trends and activites aimed at reducing problems related to alcohol tobacco and other drug use. Once a year, *Prevention File* publishes a special issue exclusively concerned with alcohol and other drug issues in higher education. To request a free copy of that issue, contact the Higher Education Center. For a one-year subscription ($25), contact The Silver Gate Group, 4635 W. Talmadge Drive, San Diego, CA 92116-4834, (619) 554-0485 (to fax credit card orders). Questions can be sent by e-mail to colth@ix.netcom.com.

Raising More Voices Than Mugs: Changing the College Alcohol Environment Through Media Advocacy: A guide to media advocacy on alcohol issues in college communities. Available from the National Clearinghouse for Alcohol and Drug Information, (800) 729-6686.

Responsible Beverage Service: An Implementation Handbook for Communities: Provides information about the principles of responsible beverage service and guidelines for communities seeking to establish a responsible beverage service council. Contact the Health Promotion Resource Center, Stanford University, 1000 Welch Road, Palo Alto, CA 94304-1885, (415) 723-0003.

Setting and Improving Policies for Reducing Alcohol and Other Drug Problems on Campus: A Guide for School Administrators: Describes an environmental-management approach to reducing alcohol and other drug problems on campus. Available from the *Higher Education Center for Alcohol & Other Drug Prevention*, 55 Chapel Street, Newton, MA 02158, (800) 676-1730, http://www.edc.org/hec.



MON	TUE	THU	FRI	SAT
MON-TUE HAPPY HOUR 1/2 PRICED DRINKS, 4-8PM				
MELROSE MADNESS 1/2 PRICED DRINKS 8pm to Close	PITCHERS 25¢ ALL NIGHT	JIMMY BUFFET "CHEESEBURGER IN PARADISE" HAPPY HOUR $1.50 CORONAS $2 CHEESEBURGERS 4-8PM 8pm to Close All U Drink Draft & Mixed Drinks	BIG ASS HAPPY HOUR 4-8PM 22oz RAIL OR DRAFT FOR $1 All U Can Drink Draft 8pm-12	$1 PITCHERS TIL MIDNIGHT $1 ROLLING ROCK BOTTLES ALL NIGHT

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