

THE PENNSYLVANIA STATE UNIVERSITY
FREEH RECOMMENDATIONS REVIEW AND IMPLEMENTATION PROJECT
STATUS REPORT AS OF OCTOBER 10, 2012

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Status summary as of October 10, 2012

Complete or Substantially Complete	40
Ongoing, with Initial Step Complete	4
In Progress and On Track	75
Behind Schedule, Intervention Required	0

All University Policies referred to herein may be found at www.guru.psu.edu/policies.

THE PENNSYLVANIA STATE UNIVERSITY
FREEH RECOMMENDATIONS REVIEW AND IMPLEMENTATION PROJECT STATUS

1. Culture

RECOMMENDATION	BOARD COMMITTEE	UNIVERSITY DEPARTMENT	STATUS
<p>1.1: Culture</p> <p>Organize a Penn State-led effort to vigorously examine and understand the Penn State culture in order to: 1) reinforce the commitment of all University members to protect children; 2) create a stronger sense of accountability among the University's leadership; 3) establish values and ethics-based decision making and adherence to the Penn State Principles as the standard for all University faculty, staff and students; 4) promote an environment of increased transparency into the management of the University; and 5) ensure a sustained integration of the Intercollegiate Athletics program into the broader Penn State community.</p> <p>This effort should include the participation of representatives from the Special Faculty Committee on University Governance; Penn State's Coalition on Intercollegiate Athletics; Penn State's Rock Ethics Institute; students, alumni, faculty and staff; as well as representatives from peer institutions with experience in reviewing and improving institutional culture in academic settings.</p>	All	University-wide	<p>In Progress & On Track</p> <p>There are many cultures at Penn State, such as a culture of research, a culture of student-centeredness and a culture that embraces diversity. The majority of these cultures are effective in promoting the mission and values of the University. All University members are committed to protecting children, promoting accountability among the University's leadership, reinforcing the University's values and commitment to ethical decision making, promoting transparency and continuing the integration of the University's Intercollegiate Athletics programs into the broader University community. These efforts are being undertaken with the participation and contributions of representatives of the entire University community, including but not limited to the groups identified in the recommendation.</p>

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1.2: Ethics Officer Appoint a University Ethics Officer to provide advice and counsel to the President and the Board of Trustees on ethics issues and adherence to the Penn State Principles; develop and provide, in conjunction with the Rock Ethics Center, leadership and ethics training modules for all areas of the University; and coordinate ethics initiatives with the University's Chief Compliance Officer. * (See also Recommendation 4.0)	Legal & Compliance	President	In Progress & On Track Consideration is being given to combining the Ethics Officer position with the Chief Compliance Officer position. This preference has been expressed by each of the finalists for the Chief Compliance Officer position. It has also been the recommendation of our faculty experts in the field. The Compliance position will be filled shortly.
1.2.1: Ethics Officer Establish an "Ethics Council" to assist the Ethics Officer in providing advice and counsel to the President and the Board on ethical issues and training.	Legal & Compliance	President	In Progress & On Track The Ethics Officer or the Compliance and Ethics Officer will complete this function.
1.2.2: Conflict of Interest Finalize and approve the proposed modifications to the Institutional Conflict of Interest Policy, identify the senior administrative and faculty positions to which the policy should apply, and implement the policy throughout the University.	Legal & Compliance	General Counsel	In Progress & On Track The University currently has an Institutional Conflict of Interest Policy, as well as an Institutional Conflict of Interest Committee. Discussions began a couple of years ago to expand its scope. The General Counsel will review the proposed changes, make final recommendations and move the policy through the approval process for completion.
1.3: Search Processes Conduct open and inclusive searches for new employees and provide professional training for employees who undertake new responsibilities.	Subcommittee on Human Resources	Human Resources	In Progress & On Track The University's job posting system has been updated to allow for simultaneous posting of staff jobs both internally and externally (previously all postings were required to only be posted internally prior to posting to external applicants) as well as daily posting of jobs to encourage use of the system for all positions (part-time, faculty, etc.) This has allowed for more robust and diverse candidate pools. The Recruitment and Compensation group will continue to identify and implement processes and procedures that encourage open and inclusive searches and human resources best practices. The University's Center for Workplace Learning and Performance is developing enhanced training procedures for new employees and employees who take on new responsibilities.

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1.4: Continuous Improvement Continue to benchmark the University's practices and policies with other similarly situated institutions, focus on continuous improvement and make administrative, operational or personnel changes when warranted.	Subcommittee on Human Resources; Outreach, Development and Community Relations	All	Ongoing/Continuous The University will continue to benchmark practices and policies and make changes as appropriate. This recommendation will also be addressed by implementing other Freeh recommendations that relate to improved policy and practice development.
1.5: Policy Communication Communicate regularly with University students, faculty, staff, alumni and the community regarding significant University policies and issues through a variety of methods and media.	Subcommittee on Human Resources; Outreach, Development and Community Relations	Human Resources; University Relations	In Progress & On Track The University will continue its extensive communications practices regarding significant policies and issues. By way of example, extensive efforts have been put forth to communicate the implementation of University Policies AD39 (<i>Minors Involved in University-Sponsored Programs or Programs Held at the University and/or Housed in University Facilities</i>) and HR99 (<i>Background Check Process</i>), including open forum sessions for all those involved in managing and/or implementing these policies, including all campuses; frequently asked question documents for distribution to employees; individualized training sessions and updates to senior leadership, colleges and units (including multiple sessions in Intercollegiate Athletics); University-wide communications; and input for multiple articles in the local and national media. These efforts are ongoing. On a semester basis, the Office of Human Resources will partner with Administration and Public Information to disseminate a message to all faculty, staff and students regarding reporting resources.
1.6: Transparency Emphasize and practice openness and transparency at all levels and within all areas of the University.	All	All	Ongoing/Continuous Efforts have been continuous and made at all levels of the University. At the Board of Trustees level, the Board has created more opportunities for public attendance at Board and committee meetings; established a forum for public comment at Board meetings; instituted monthly communications from the Board Chair with respect to University matters; and created a new Board website to provide relevant information to the public and University stakeholders, all in an effort to be more open and transparent. At the administrative level, the University is enhancing and improving internal and external communications, encouraging more open discussion of relevant issues among the President's Council and taking steps to keep the public and University stakeholders informed of relevant issues, including the publication of monthly status reports on the implementation of the Freeh recommendations.

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2. Administration & General Counsel: Structure, Policies & Procedures

RECOMMENDATION	BOARD COMMITTEE	UNIVERSITY DEPARTMENT	STATUS
2.1: Review organizational structures and make adjustments for greater efficiency and effectiveness.			See below
2.1.1: Presidential Responsibilities Evaluate the span of control of the University President and make adjustments as necessary to ensure that the President's duties are realistic and capable of the President's oversight and control.	Governance and Long-Range Planning	President; Board of Trustees	In Progress/On track The Board Chair and Vice Chair, along with the Governance Committee, are reviewing the President's span of control. The Chair and Vice Chair will consult with outside experts, such as the Association of Governing Boards, in connection with their analysis.
2.1.2: Senior VP Finance & Business Evaluate the span of control and responsibility of the Senior Vice President – Finance and Business ("SVP-FB") and make adjustments as necessary to ensure that the SVP-FB's duties are realistic and capable of the SVP-FB's oversight and control.	Governance and Long-Range Planning	President	In Progress & On Track The Chair of the Board's Governance and Long Range Planning Committee has begun conversations with the President and the Senior Vice President for Finance and Business on this topic. Benchmarking against Committee on Institutional Cooperation peers will be performed and adjustments, if appropriate, will be implemented.
2.1.3: Vice President of Human Resources Upgrade the position of the Associate Vice President for Human Resources to a Vice President position reporting directly to the University President.	Governance and Long-Range Planning	President; Finance & Business	In Progress & On Track Benchmarking against Committee on Institutional Cooperation peers has been performed. Concur with the recommendation to upgrade the position to vice president status, but insufficient rationale exists to shift reporting to the President. The Vice President will continue to report to the Senior Vice President for Finance and Business but will have regular access to the President and will participate in the President's Council.
2.1.4: President's Council Evaluate the size, composition and procedures of the President's Council and make adjustments as necessary.	Governance and Long-Range Planning	President; President's Council	In Progress & On Track Action will be taken based on the results of the analysis referred to in Sections 2.1.1 and 2.1.2.
2.2: Continuous Improvement Review administrative processes and procedures and make adjustments for greater efficiency and effectiveness.	All	All	In Progress & On Track This recommendation will be addressed by implementing the other Freeh recommendations and by continually reviewing policies and procedures.

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2.2.1: Office of Human Resources Location Separate the University's Office of Human Resources ("OHR") from the University's Finance and Business organization.	Subcommittee on Human Resources; Finance, Business and Capital Planning	President; Finance & Business	In Progress & On Track See 2.1.3.
2.2.2: Office of Human Resources Expansion Assign all human resources ("HR") policy making responsibilities to OHR and limit the ability of individual departments and campuses to disregard the University's human resources policies and rules	Subcommittee on Human Resources; Finance, Business and Capital Planning	President; Finance & Business	Complete/Substantially Complete A small group of Office of Human Resources representatives, college and administrative HR representatives, and other key areas of the University will constitute a review group to ensure engagement and ownership of HR policy changes and revisions. Initial key stakeholders will be brought together to discuss a possible policy review group model (similar to the University's Records Retention Group); initial key stakeholders for discussion purposes to include the Office of Planning and Institutional Assessment, the Office of Human Resources and the Provost's Office.
2.2.3: Office of Human Resources Centralization Centralize HR functions, where feasible, such as background checks, hiring, promotions, terminations, on-board orientation and management training, while recognizing the unique requirements of University components and Commonwealth campuses, and their need for measured autonomy.*	Subcommittee on Human Resources; Finance, Business and Capital Planning	President; Finance & Business	In Progress/On Track See 2.2.4. This administrative change will lead to better centralization and coordination of HR functions. President's Council meetings will be used to bring administrative units into alignment where deficient.
2.2.4: Office of Human Resources Reporting Designate the Vice President for Human Resources ("VP-HR") as the hiring authority for HR representatives throughout the University and establish a "dotted-line" reporting relationship between the HR representatives and the VP-HR similar to that used in the Finance and Audit areas.	Subcommittee on Human Resources; Finance, Business and Capital Planning	President; Finance & Business	In Progress & On Track Subject to final review and approval, a memorandum from the President will be sent to deans, chancellors and unit heads advising that all college/campus/unit chief HR administrators will have a dual reporting line to their unit head and the Vice President of HR and abide by all University HR policies and guidelines.

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2.2.5: Job Descriptions Develop job descriptions for all new key leadership positions and incumbent positions if none exist.	Subcommittee on Human Resources	Human Resources	Complete/Substantially Complete The Recruitment and Compensation group of the Office of Human Resources developed the description for the newly created University Compliance Director position and developed the position description for the new General Counsel, which was used in the search. Additional job descriptions will be developed for other leadership positions.
2.2.6: Office of Human Resources Staff Evaluate the size of the OHR staff, benchmark its human capital capacity against public universities of similar size and scope of responsibility, and modify as necessary.	Subcommittee on Human Resources	Human Resources	Complete/Substantially Complete The Employee Relations group benchmarked the organizational structure of the Human Resources function against a mix of Association of American Universities and Big Ten universities and shared that information with the Human Resources Subcommittee of the Board. Consulting firms have been pre-qualified through a competitive RFP to assist the Office of Human Resources in a detailed organizational analysis. That analysis will include a detailed review of HR service delivery and alignment. In accordance with University Policy HR03 (<i>Delivery of Human Resources Services</i>), the Associate Vice President will review and approve all position requirements for human resource related positions. In addition, the Associate Vice President for Human Resources shall direct that periodic assessments be conducted of both central and work unit programs and services to ensure that established standards, guidelines and policies are being followed and report to senior leadership accordingly.
2.2.7: Human Resource Information System Adopt a Human Resource Information/Capital Management System ("HRIS/HCM") with sufficient growth capacity for use at University Park and all Commonwealth campuses.	Subcommittee on Human Resources; Finance, Business and Capital Planning	Human Resources; Information Technology Services	In Progress & On Track Information Technology strategic plan development is under way. There is continual discussion and collaboration between Finance and Business and the Information Technology Services groups. An RFP for a new Human Resource Information system is being developed.
2.2.8: Performance Management Engage external HR professionals to assist in the development of the University's next performance management system.	Subcommittee on Human Resources	Human Resources	In Progress & On Track There is a recognized need to re-engineer the current performance management practices in order to create a process that truly rewards exceptional performance and includes greater accountability, consistency and opportunities for employee growth and development. A consultant has been retained and this process is under way.
2.2.9: Executive Compensation Provide the OHR with complete access to executive compensation information and utilize the OHR, in conjunction with the University Budget Office, to benchmark and advise the administration and the Board of Trustees on matters of executive compensation.	Compensation Council; Subcommittee on Human Resources	Finance & Business; Human Resources	In Progress & On Track The Associate Vice President for Human Resources has been given access to executive compensation data. The Recruitment and Compensation group has been involved in several benchmarking requests for senior leadership positions. The Office of Human Resources is coordinating with the Controller's Office on the executive appointment and compensation process.

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2.2.10: Track Training Develop a mechanism to provide and track all employee training mandated by state and federal law and University policies.	Legal & Compliance; Subcommittee on Human Resources	Human Resources; University Compliance	In Progress & On Track A partnership was established between the Office of Human Resources and the University's IT Training Services group to address these needs together. Initial mandated trainings focus on: mandated reporting, Clery Act, background checks, and management/leadership training. Efforts are under way to expand to other areas. In general, mandated training programs exist in all relevant areas. Additional work is necessary to coordinate all of the training efforts and track employee attendance.
2.2.11: Background Checks Update, standardize, centralize, and monitor background check procedures.*	Subcommittee on Human Resources	Human Resources	Complete/Substantially Complete This has been completed with the implementation of University Policy HR99 (<i>Background Check Process</i>).
2.2.12: Update Background Checks Require updated background checks for employees, contractors and volunteers at least every five years.*	Subcommittee on Human Resources	Human Resources	In Progress & On Track Annual checks are done for individuals who work with children. For others, the University will review this recommendation for feasibility after the initial implementation of background checks has been completed.
2.2.13: Audit Background Checks Audit periodically the effectiveness of background check procedures and the University's self-reporting system for employees.*	Audit and Risk	Internal Audit	Complete/Substantially Complete New background check Policy HR99 (<i>Background Check Process</i>) became effective July 5, 2012. An audit plan will be developed. Such a plan will incorporate operational monitoring and compliance testing, on a University-wide basis.
2.2.14: Computer Use Policy Update computer-use policies and regularly inform employees of the University's expectations and employee responsibilities with regard to electronic data and materials.	Finance, Business and Capital Planning	Information Technology Services	In Progress & On Track The Office of Human Resources and the Security Operations and Services group will coordinate to review computer use policies and how they are communicated.
2.2.15: Employee Roll-off and Access Revocation Develop a procedure to ensure that the University immediately retrieves keys and access cards from unauthorized persons.*	Subcommittee on Human Resources	Human Resources	Complete/Substantially Complete Employee Relations conducted a survey of a cross-section of University Park work units and Commonwealth campuses to collect existing practices. HR will communicate to all units the mandate to retrieve keys and access cards.
2.3: Complete the development of the University's Office of General Counsel ("OGC").			See 2.3.1 through 2.3.4 below.

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2.3.1: Office of General Counsel Mission Develop a mission statement for the OGC that clearly defines the General Counsel's responsibilities and reporting obligations to the University and the Board of Trustees.	Legal & Compliance	General Counsel	In Progress & On Track The General Counsel will prepare a mission statement that clearly defines reporting lines, including to the Board of Trustees. The mission statement will be posted on the Office of General Counsel's website. Reporting lines will be discussed with the President and the Board Committee on Legal and Compliance. The issue of the General Counsel's role and reporting obligations will be covered in training for new trustees and in annual meetings with the Legal and Compliance Committee. The General Counsel will work with the Legal Subcommittee to prepare operating guidelines for that subcommittee.
2.3.2: General Counsel Select and hire a permanent General Counsel ("GC").	Full Board	President	Complete/Substantially Complete This recommendation was completed on July 16, 2012 with the hiring of Stephen S. Dunham.
2.3.3: Office of General Counsel Staffing Expand the General Counsel's office staff to provide broader coverage of routine legal issues including employment law.	Legal & Compliance	General Counsel	In Progress & On Track Position descriptions for three new positions were prepared and posted in September. The three positions are: employment, research and health law. In addition, the Office has announced that it will add another 4-6 lawyers during 2013. The subject matter areas are still being considered. New space in the Rider Building has been arranged to accommodate this growth. The President has approved the general growth plan. The University hopes to hire the first three additional lawyers by December 31, 2012 and several more lawyers by December 31, 2013.
2.3.4: Office of General Counsel Support Appropriate sufficient budget to the OGC to hire specialized outside counsel when needed.	Legal & Compliance	General Counsel; Provost	Complete/Substantially Complete The Office of General Counsel has been provided sufficient authority to hire outside counsel in specialized areas.
2.4: Executive Searches Advertise all senior executive positions externally and engage educational search experts to broaden the talent pools for senior executive positions.*	Subcommittee on Human Resources	President; Provost; Human Resources	In Progress & On Track The Office of Human Resources is developing a revised policy to address this recommendation.
2.5: Professional Development Integrate faculty and staff from different disciplines and areas in University-wide professional development/leadership training to increase their exposure to other University personnel, programs, challenges and solutions.*	Subcommittee on Human Resources	Human Resources	In Progress & On Track As part of the Center for Workplace Learning and Performance's curriculum in Leadership and Management, a program will be offered that brings faculty and staff together to discuss University priorities, share best practices and collaborate in problem solving. The goal of the program will be to create an opportunity for faculty and staff to work together to find solutions to existing University needs. The existing offerings of scheduled programs and certificate programs will be updated and restructured to reflect many new concepts, such as updated policies, Penn State's competencies and current adult-focused learning theories.

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2.6: Record Retention Implement consistent, state-of-the art records management and retention procedures.	Audit and Risk	University Libraries	In Progress & On Track The Provost's Office will play an important role in communicating via Academic Leadership Council the importance of adherence to documentation management and records retention. The President's Office will play the same role with the administrative units. The Records Management Program, part of the University Libraries and administered by the University Archives, was established in 1989 at the behest of then University President Bryce Jordan to assure that University offices were in compliance with legal requirements and records retention schedules. In accordance with delineated procedures outlined in Administrative Policy AD-35 (<i>University Archives and Records Management</i>), the Records Management program provides extensive support to University faculty and staff in the form of educational training, professional development and compliance coordination.
2.7: Student Conduct Provide sufficient support and oversight of the Office of Student Affairs to make certain that all students follow the same standards of conduct.*	Academic Affairs and Student Life	Student Affairs	In Progress & On Track The Office of Student Affairs applies the same standards of conduct to all students and has sufficient resources to do so.
2.8: Designate an individual, administrative entity or committee to approve and review all new and modified University policies.			In Progress & On Track See 2.8.1 and 2.8.2
2.8.1: Policy Development Review Develop guidelines for creating, standardizing, approving, reviewing and updating University policies.	As Applicable	General Counsel; Administration	In Process & On Track University-wide policies are collected and disseminated in an organized way on the University's GURU website. See www.guru.psu.edu/policies . The General Counsel will work with the Vice President for Administration to prepare a Policy on Policies that will provide a structure to policy development that will cover the process for creating, standardizing, approving and updating University policies.
2.8.2: Policy Review Review periodically all University policies for relevance, utility and necessity, and modify or rescind as appropriate.	As Applicable	General Counsel; Administration	In Process & On Track In conjunction with developing the Policy on Policies, an inventory of University policies will be developed. Following the inventory, a timeline for periodic reviews of policies in different areas will be established.

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3. Board of Trustees: Responsibilities & Operations

RECOMMENDATION	BOARD COMMITTEE	UNIVERSITY DEPARTMENT	STATUS
3.1: Board Composition and Function Review the administrative and governance issues raised in this report, particularly with regard to the structure, composition, eligibility requirements and term limits of the Board, the need to include more members who are not associated with the University, and the role of the Emeriti. In conducting this review, the Board should seek the opinions of members of the Penn State community, as well as governance and higher education experts not affiliated with the University. The Board should make public the results and recommendations generated from the review.	Governance and Long-Range Planning	Board of Trustees	In Process & On Track Governance is an ongoing process. Many of the recommendations cited in this section have already been reviewed and completed. The Board already has taken action and reduced the amount of time a board member can serve. A meeting is being planned with emeriti members and governance committee to define roles of emeriti trustees. The Governance Committee of the Board will continue to examine issues related to governance and make recommendations to the full Board.
3.2: Board Of Trustees Conflict Review, develop and adopt an ethics/conflict of interest policy for the Board that includes guidelines for conflict management and a commitment to transparency regarding significant issues.	Legal & Compliance	Board of Trustees; General Counsel	In Process & On Track A conflict of interest policy exists; however, benchmarking is being done and consideration is being given to amending the policy based on best practices.
3.2.1: Board of Trustees Orientation Include training on ethics and oversight responsibilities in the current regulatory environment in Board member orientation.	Legal & Compliance	Board of Trustees; General Counsel	Complete/Substantially Complete An orientation session for new members includes a meeting with the General Counsel that will focus on ethics and oversight responsibilities. This topic will also be discussed in the Legal and Compliance Committee.
3.2.2: Board Of Trustees Conflict of Interest Disclosure Require full and public disclosure by Board members of financial relationships between themselves and their businesses and the University.	Governance and Long-Range Planning	Board of Trustees; General Counsel	In Process & On Track See Recommendation 3.2

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3.3: Board Of Trustees Committee Restructuring Implement the Board's proposals for revised committee structures to include a committee on Risk, Compliance, Legal and Audit and subcommittees for Audit and Legal matters; and a subcommittee for Human Resources as part of the Committee on Finance, Business and Capital Planning.*	All	Board of Trustees	Complete/Substantially Complete This recommendation was completed in March 2012 and revised in July 2012.
3.3.1: Board Of Trustees Committee Rotation Rotate Committee Chairs every five years or sooner.	All	Board of Trustees	In Process & On Track An assessment of whether any Committee Chairs have served five years or more in their roles will be conducted. The Board's governance documents will be amended to reflect a five-year term limit for committee chairmanship. A succession-planning concept for leadership will be discussed and implemented.
3.4: Communication Increase and improve the channels of communication between the Board and University administrators.	All		Complete/Substantially Complete This recommendation is being implemented through, among other avenues, more frequent meetings between Board leadership and the President's Council.
3.4.1: Board Of Trustees Reporting Ensure that the University President, General Counsel and relevant members of senior staff thoroughly and forthrightly brief the Board of Trustees at each meeting on significant issues facing the University.*	All	Board of Trustees; President's Counsel; General Counsel	In Progress & On Track For positions reporting to the Provost, and matters pertaining to Academic Affairs, issues will be brought to regular Board committee seminars for discussion. Updates and communications from the President and General Counsel are regular, routine and not confined to formal meeting times. The General Counsel has weekly meetings with the Legal Subcommittee. The President has a weekly conference call with the Board chair and vice chair.
3.4.2: Risk Reporting Require regular Risk Management, Compliance and Internal Audit reports to the Board on assessment of risks, pending investigations, compliance with federal and state regulations as well as on measures in place to mitigate those risks.	Audit & Risk; Legal & Compliance	General Counsel; Finance & Business	Complete/Substantially Complete With creation of Audit and Risk Committee and the Legal and Compliance Committees, the framework is in place to implement this recommendation. The Legal and Compliance Committee is developing operating guidelines.

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3.4.3: Legal and Risk Reporting Require that the SVP-FB, the GC and/or their designee to provide timely briefings to the Board on potential problem areas such as unusual severance or termination payments, faculty and staff emeriti appointments, settlement agreements, government inquiries, important litigation and whistleblower complaints.	Subcommittee on Human Resources; Legal & Compliance	General Counsel; Finance & Business; Provost	In Progress & On Track The General Counsel will propose a set of guidelines as to which legal and risk matters should be taken to the Board for briefings. This will be discussed, approved and mandated by the Legal and Compliance Committee of the Board. Risk reporting will also continue to be made to the Audit and Risk Committee. The Senior Vice President for Finance & Business will report unusual severance or termination payments or other significant items that are deemed problematic or unusual to the appropriate subcommittee or committee of the Board.
3.4.4: Board Of Trustees Executive Session Use the Board's Executive Session/Question Period with the President to make relevant and reasonable inquiry into substantive matters and to facilitate sound decision-making.	n/a	Board of Trustees; President	Complete/Substantially Complete This recommendation has been implemented. In addition, bi-weekly meetings among the President, the Board Chair and the Board Vice Chair serve as a good platform for open dialogue.
3.4.5: Annual Reviews Review annually the University's <i>Return of Organization's Exempt from Income Tax Form (990)</i> , Clery Act reports, and the compensation and performance of senior executives and leaders.*	Audit & Risk; Compensation Council	Board of Trustees; President; Finance & Business	In Process & On Track The University's Right to Know Report, which incorporates Form 990, and the compensation and performance of the senior executives and leaders, are reviewed by the Board or an appropriate committee. The Clery Act reports will be reviewed on an annual basis.
3.4.6: Clery Review and Training Conduct an informational seminar for the Board and senior administrators on Clery Act compliance and reporting procedures.	n/a	Board of Trustees; Finance & Business	In Process & On Track This seminar is planned for November 2012
3.4.7: Board Of Trustees Media Reporting Continue to provide all Board members with regular reports of local, national and academic media coverage of the University.*	n/a	Board of Trustees; University Relations	Complete/Substantially Complete Daily News Issues Updates are distributed. The University also offers subscriptions to several periodicals: The Collegian, Chronicle of Higher Education; Association of Governing Boards' Trusteeship Magazine; and Penn State Pulse surveys.
3.5: Communication Increase and improve the channels of communication between the Board and the University community.	n/a	n/a	Complete/Substantially Complete The University has instituted Chairman Updates on a monthly basis, a public comment period at public board meetings and is continuing to explore other avenues of communication. Several "listening sessions" with the Chair and Vice Chair have been held with faculty members, students, staff, alumni and other University stakeholders. These sessions are ongoing.

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3.5.1: Board Of Trustees Confidentiality Establish and enforce rules regarding public and press statements made by Board members and Emeriti regarding confidential University matters.	Governance and Long-Range Planning	Board of Trustees	In Process & On Track General Counsel has been asked to develop a proposal to deal with this issue, which will be discussed with the Governance and Long-Range Planning Committee prior to the November Board meeting. In addition, a communications policy for trustees is being developed.
3.5.2: Board Of Trustees Communication to Board by Public Increase and publicize the ways in which individuals can convey messages and concerns to Board members.	n/a	Board of Trustees	In Process & On Track The Outreach and Development and the Governance and Long-Range Planning Committees will review processes for individuals to communicate with the Board.
3.5.2.1: Board Of Trustees Contact Provide Board members with individual University email addresses and make them known to the public.	Outreach, Development and Community Relations	Board of Trustees	In Process & On Track The Outreach and Development and the Governance and Long-Range Planning Committees are reviewing processes for establishment of individual Board of Trustees email addresses for posting on public website.
3.5.2.2: Board Of Trustees Social Media Use common social media communications tools to communicate with the public on various Board matters.	Outreach, Development and Community Relations	Board of Trustees; University Relations	In Process & On Track The University's external and internal communications teams are working on a strategy to use social media tools to convey the University's messages.
3.6: Crisis Communications Plan Develop a critical incident management plan, including training and exercises, for the Board and University administrators.	Outreach, Development and Community Relations	Board of Trustees; University Relations	In Process & On Track A Board crisis management plan is in development. Once it is finalized, a Board training program will be developed and implemented.
3.7: Board Of Trustees Self-Assessment Continue to conduct and publicize periodic internal and external self-assessments of Board performance.*	Governance and Long-Range Planning	Board of Trustees	In Process & On Track A Board self-assessment seminar is planned for January 2013.

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4. Compliance

RECOMMENDATION	BOARD COMMITTEE	UNIVERSITY DEPARTMENT	STATUS
4.1: Hire Chief Compliance Officer Establish and select an individual for a position of "Chief Compliance Officer,"* The Chief Compliance Officer should:	Legal & Compliance	Administration; Finance & Business	In Process & On Track The search process for this position is near completion. Three finalists have been identified and concluding interviews will be completed by late October.
4.1.1: Chief Compliance Officer Duties Head an independent office equivalent to the Office of Internal Audit.	Legal & Compliance	Finance & Business	In Process & On Track This will be part of the job description for the Director of University Compliance, who shall be the Chief Compliance Officer. Once hired, the Director of University Compliance will head an office similar to the Office of Internal Audit. The Director of University Compliance will be on a dual reporting line to the Board of Trustees (through the Committee on Legal and Compliance) and the Senior Vice President for Finance and Business.
4.1.2: Chief Compliance Officer Duties Chair a Compliance Council.	Legal & Compliance	Finance & Business	In Process & On Track Once the Director of University Compliance is hired, a Compliance Council will be formed that the Director will chair and convene on a regular basis.
4.1.3: Chief Compliance Officer Duties Coordinate compliance functions in a manner similar to the Office of Internal Audit.	Legal & Compliance	Finance & Business	In Process & On Track Once hired, the Director will organize and coordinate compliance functions in a manner similar to the Office of internal Audit.
4.1.4: Chief Compliance Officer Duties Have similar access to, and a reporting relationship with the Board, as does the Internal Auditor.	Legal & Compliance	Finance & Business	In Process & On Track See 4.1.1 above.
4.1.5: Chief Compliance Officer Duties Coordinate the Chief Compliance Officer's responsibilities with the Office of General Counsel, the Director of Risk Management and the Director of Internal Audit.	Legal & Compliance	Finance & Business	In Process & On Track The Director will work closely with the Office of General Counsel, Risk Management and the Office of Internal Audit. Plans are for all of those offices to be set up in proximate locations for ease of communications and interaction.
4.1.6: Chief Compliance Officer Duties Direct further review of any incidents or risks reported to the Compliance Officer.	Legal & Compliance	Finance & Business	In Process & On Track This will be part of the job description for the Chief Compliance Officer.
4.2: Clery Officer Assign full-time responsibility for Clery Act compliance to an individual within the University Police Department and provide the individual with sufficient resources and personnel to meet Clery Act regulations.* The individual responsible for Clery Act compliance should:	Legal & Compliance	Finance & Business	Complete/Substantially Complete This was accomplished in February 2012 with the hiring of Gabriel R. Gates, the Clery Compliance Coordinator.

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4.2.1: Clery Policy Establish a University policy for the implementation of the Clery Act.	Legal & Compliance	General Counsel; Finance & Business	In Progress & On Track A draft of University Policy AD 74 (<i>Compliance with the Clery Act</i>) has been prepared and was approved in October.
4.2.2: Clery Master List Create a master list of names of those persons with Clery Act reporting responsibilities, notify them annually of the Clery Act responsibilities and publish the list to the University community.	Legal & Compliance	Finance & Business; Police Services	Complete/Substantially Complete This was accomplished with assistance from the Office of Human Resources. Approximately 3,000 employees were recently notified of their responsibilities. This notification will be repeated annually. Consideration is being given as to how best to communicate the list within the University community.
4.2.3: Campus Security Authorities Training Require, monitor and track training, and periodic retraining for Campus Security Authorities ("CSAs") on Clery Act compliance.	Legal & Compliance	Finance & Business; Police Services	Complete/Substantially Complete Initial training has been completed. Annual updates are being developed
4.2.4: Clery University-wide Training Provide information to the OHR on Clery Act responsibilities, reporting suspicious activity to CSAs and whistleblower protection for inclusion in the general training for all employees.	Legal & Compliance	Finance & Business; Police Services; Human Resources	In Progress & On Track The Office of Human Resources is in the process of establishing a "common area" on its website that will include resources for employees, management and HR representatives on all of the recent policies/requirements including Policies AD39 (<i>Minors Involved in University-Sponsored Programs or Programs Held at the University and/or Housed in University Facilities</i>), AD72 (<i>Reporting Suspected Child Abuse</i>), AD74 (<i>Compliance with the Clery Act</i>) and HR99 (<i>Background Check Process</i>). A combined PowerPoint presentation for all four areas has been created in a joint effort among the Office of Human Resources, Risk Management and University Police. Links will be provided to other websites such as the Ethics website and Clery website. The Center for Workplace Learning and Performance is partnering with the Clery Compliance Officer to develop online Clery Training, which will include information on all aspects of campus security authority responsibilities under the Clery Act.
4.2.5: Incident/Threat Notifications Coordinate timely notices of incidents and threat warnings with the Vice President for Student Affairs, the Chief Compliance Officer and the General Counsel.	Legal & Compliance	Police Services; University Relations	In Progress & On Track The Clery Compliance Coordinator and the Assistant Vice President for Police and Public Safety are working to accomplish this in a way that does not slow down or interfere with prompt warnings.
4.2.6: Clery Review Review annual Clery Act reports with the President's Council, the Board of Trustees and the Compliance Officer.	Legal & Compliance	Finance & Business; Police Services	Complete/Substantially Complete The 2012 reports for all campuses were issued on September 30, 2012 and these meetings will be scheduled. An information session has been scheduled for the November Board of Trustees meeting. Links to the reports have been sent to the Trustees, the President's Council and the Academic Leadership Council.

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4.2.7: Clery Campus Training Coordinate Clery Act training and compliance with responsible officials at the Commonwealth campuses.	Legal & Compliance	Police Services; Commonwealth Campuses	Complete/ Substantially Complete In May and June 2012, the Clery Compliance Officer conducted a “train the trainer” session attended by representatives from each campus. These trainers will have responsibility for training all those at their respective campuses identified as campus security authorities (i.e., those with Clery responsibilities.) Campuses will have all Clery security officers trained by December 31, 2012. The infrastructure is in place to provide ongoing training for current employees and specified training for new employees.
4.2.8: Clery Audit Arrange for periodic internal and external audits of Clery Act compliance.	Audit & Risk; Legal & Compliance	Internal Audit	In Progress & On Track Similar to the auditing of background checks as noted in recommendation 2.2.13, the auditing of Clery Act compliance will be dependent on the operational aspects of compliance with the Act and compliance monitoring performed by the Clery Compliance Officer and the University’s Compliance Officer. Internal Audit will work with the Clery Compliance Officer and the University’s new Director of Compliance to develop appropriate periodic audits of Clery Act compliance.
4.3: Enterprise Risk Reporting Update regularly and prioritize the University’s list of institutional risks; determine the appropriate implementation and audit schedule for those risks; and present the results to the Board.	Audit & Risk	Finance & Business	Complete/Substantially Complete The University has maintained a list of “enterprise risks” for several years. This list is broken down by major/key risks and lesser risks. For the past four years, risk issues were discussed at the Board’s Audit Subcommittee meeting each May, with the last such subcommittee discussion taking place in May 2012. A presentation with respect to major/key risks was made to the newly created Audit and Risk Committee of the Board at its September meeting. Other risks will be reviewed at the January 2013 committee meeting.
4.4: Semester Ethics Communication Send a communication to all University students, faculty and staff at the beginning of each academic term that encourages the reporting of misconduct; describes the channels for direct or anonymous reporting; and explains the University’s whistleblower policy and protection from retaliation.	Legal & Compliance	Administration; University Relations	In Process & On Track Such an announcement was sent via email to all faculty, staff and students at the beginning of the Summer 2012 and Fall 2012 semesters.

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4.5: Hotline Awareness Publicize the employee misconduct hotline regularly and prominently throughout the University on a variety of platforms including social media networks and the webpages of individual University components.*	Audit & Risk	Internal Audit	In Process & On Track The University's Financial and Compliance Hotline ("Hotline") is currently publicized throughout the University using postcards and posters. In addition, all of the units throughout the University currently have publicity for and links to the Hotline. Also, the University newswire service runs regular news stories on the Hotline, including its purpose and how to access it. Finally, the staff handbook also contains information on the Hotline. The University will continue to make use of the current publicity venues described above with recurring news wire articles and regular periodic updates to printed materials and unit web pages. Such updates will occur at least on an annual basis. With respect to social media, the University will assess if social media is an appropriate venue for advertising the Hotline and if so, what particular social media should be used.

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5. Athletics

RECOMMENDATION	BOARD COMMITTEE	UNIVERSITY DEPARTMENT	STATUS
5.1: Intercollegiate Athletics Organizational Structure Revise the organizational structure of the athletic department to clearly define lines of authority, responsibilities and reporting relationships.	All	President; Intercollegiate Athletics	Complete/Substantially Complete Changes in the organization structure have been made with respect to a number of senior members of Intercollegiate Athletics responsible for football operations, compliance, human resources and communications.
5.2: Athletic Facilities Access Evaluate security and access protocols for athletic, recreational and camp facilities and modify as necessary to provide reasonable protections for those using the facilities.*	Finance, Business and Capital Planning	Finance & Business ; Intercollegiate Athletics	Complete/Substantially Complete Security and access protocols for athletic, recreational and camp facilities were tightened through the issuance of new Policy AD73 (<i>Reporting Suspected Child Abuse</i>) in July 2012. The implementation of the security and access system is under way.
5.3: Intercollegiate Athletics Organizational National Searches Conduct national searches for candidates for key positions, including head coaches and Associate Athletic Director(s) and above.	Subcommittee on Human Resources	Human Resources ; Intercollegiate Athletics	In Progress & On Track The University's hiring policies are being revised to provide for national searches for candidates for head coaching positions and positions in Intercollegiate Athletics with the titles of Associate Athletic Director and above, with exceptions as approved by the President of the University.
5.4: Academic Support for Athletes Integrate, where feasible, academic support staff, programs and locations for student-athletes.*	Academic Affairs and Student Life	Undergraduate Education	Complete/Substantially Complete The academic and athletics programs are already fully integrated. The current location of offices is programmatically appropriate and is consistent with the availability of space. However, consideration is being given to consolidating the physical locations of academic support facilities, when and if feasible, in order to maximize convenience and effectiveness.
5.5: Athletic Compliance Provide the University's Athletic Compliance Office with additional staff and adequate resources to meet its many responsibilities.*	Legal & Compliance	Intercollegiate Athletics	Complete/Substantially Complete An additional full-time administrative staff member was hired in July 2012. This represents the second full-time staff addition in the past two years. In addition, a clerical position was upgraded to a professional administrative position handling financial aid. The newly upgraded position was subsequently filled by a highly experienced professional and represents an appropriate level of staffing based on current operations of the office. The Associate Athletic Director for Compliance and Student Services is currently reviewing software products to assist with monitoring and efficiency with the hope of implementing a product for the 2013-14 academic year.
5.5.1: Benchmark Intercollegiate Athletics Compliance Benchmark against peer institutions to determine an appropriate staffing level for the office.	Legal & Compliance	Human Resources ; Intercollegiate Athletics	Complete/Substantially Complete Benchmarking with Big Ten peer institutions has been completed. Consideration is being given to hiring an additional staff member to handle eligibility certification.

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5.5.2: Compliance Reporting Relationship Establish an effective reporting relationship with the University Compliance Officer.	Legal & Compliance	Intercollegiate Athletics ; University Compliance	Complete/Substantially Complete The Associate Athletics Director for Compliance and Student Services and the Athletics Integrity Officer will report to the University's Chief Compliance Officer.
5.5.3: Intercollegiate Athletics Compliance Realignment Realign the compliance-related responsibilities of Athletic Department staff members to ensure that the Athletic Compliance Office has oversight of the entire program.	Legal & Compliance	Intercollegiate Athletics ; University Compliance	Complete/Substantially Complete Based on the expansion of the Intercollegiate Athletics Compliance staff, some duties that have traditionally been handled outside of Compliance will transition to compliance control. Specifically, the Intercollegiate Athletics Compliance staff will take over primary responsibility for the following topical areas: playing and practice season declarations (June 2012), coaching limitations (October 2012) and review of team schedules / compliance with minimum and maximum contest limits (June 2013).
5.5.4: Compliance Education Ensure that new hires and incumbent compliance personnel have requisite working knowledge of the NCAA, Big Ten Conference and University rules.	Legal & Compliance	Intercollegiate Athletics ; University Compliance	Complete/Substantially Complete The Intercollegiate Athletics compliance staff has conducted in-person training on an on-going basis, and has maximized the use of education via email and mail. Attendance at training and knowledge of NCAA and Big Ten rules and regulations will be emphasized in the performance evaluation of compliance staff.
5.6: Compliance Training Ensure that Athletic Department employees comply with University-wide training mandates.	Legal & Compliance; Subcommittee on Human Resources	Intercollegiate Athletics; University Compliance; Human Resources	Complete/Substantially Complete Intercollegiate Athletics employees are required to comply with University-wide training mandates without exception. For example, training sessions for Intercollegiate Athletics employees have been conducted on mandated reporter requirements and the implementation of University Policies AD39 (<i>Minors Involved in University-Sponsored Programs or Programs Held at the University and/or Housed in University Facilities</i>) and HR99 (<i>Background Check Process</i>). Thirty in-person mandated reporter and Clery Act trainings were conducted May-July 2012. More than 1,000 Intercollegiate Athletics staff members from following areas completed the training: camps, football, museum, touring groups and any other areas that work with minors. Additional Mandated Reporter & Clery Act trainings were conducted in September. The trainings target employees who work in areas that deal directly with minors. New policies are being developed to ensure subsequent training of new hires and existing employees, as appropriate.
5.6.1: Track Compliance Training Provide and track initial and on-going training for athletic staff in matters of leadership, ethics, the Penn State Principles and standards of conduct, abuse awareness, and reporting misconduct pursuant to the Clery Act and University policy.	Legal & Compliance; Subcommittee on Human Resources	Intercollegiate Athletics; University Compliance; Human Resources	Complete/Substantially Complete The University has provided and will continue to provide initial and ongoing training for Intercollegiate Athletics staff members on a variety of topics, including the topics identified in this recommendation. For example, the University's Center for Workplace Learning and Performance provided mandated reporter training and Clery Act training to Intercollegiate Athletics employees. All Intercollegiate Athletics employees will be required to take this training on an annual basis (online). Additional training programs have been conducted in the areas of leadership and ethics and more are planned.

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5.6.2: Management Training Opportunities Include Athletic Department employees in management training programs provided to other University managers.	Subcommittee on Human Resources	Intercollegiate Athletics ; Human Resources	In Progress & On Track Intercollegiate Athletics employees will be made aware of, and be given opportunities to participate in, management training programs offered to other managers in the University. An action plan to ensure that Intercollegiate Athletics employees are made aware of these training opportunities is being developed.

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6. University Police Department

RECOMMENDATION	BOARD COMMITTEE	UNIVERSITY DEPARTMENT	STATUS
6.1: External Review of Police Arrange for an external examination of the University Police department's structure, organization, policies and procedures through a professionally recognized accreditation body, with a particular emphasis on the University Police Department's training for and qualifications of sex abuse investigators.*	Finance, Business and Capital Planning	Finance & Business	In Progress & On Track The University has contacted Commission on the Accreditation on Law Enforcement (CALEA) to conduct this review. University Police is pursuing full accreditation by CALEA.
6.2: Senior Vice President Finance & Business, Police Review the organizational placement of the University Police department in the University's Finance and Business area in conjunction with the review of the span of control of the SVP-Finance & Business. (See Section 2.0)	Finance, Business and Capital Planning	President; Finance & Business	Complete/Substantially Complete A benchmark review of 15 peer universities was conducted in July 2012. Eleven of 15 chief law enforcement/public safety officers report to the chief administrative officer or business officer. It is recommended that the current line of reporting for University Police and Public Safety to the Senior Vice President for Finance and Business be maintained.
6.3: Public Safety Resources and Authority Provide the Vice President/Director of Public Safety with sufficient administrative authority and resources to operate effectively and independently.	Finance, Business and Capital Planning	President; Finance & Business	In Process & On Track The University has undertaken an assessment of the extent to which additional authority and/or resources need to be allocated to the Assistant Vice President for Police and Public Safety. Approval has been given and funding provided for two additional positions, a financial assistant and the Clery Compliance Coordinator.
6.4: Records Management Review records management procedures and controls and revise where needed.*	Finance, Business and Capital Planning	Finance & Business; Police Services	Complete/Substantially Complete Completed July 2012.
6.4.1: Police Reports to Office of Human Resources (OHR) Establish a policy to ensure that all police reports alleging criminal conduct by Penn State students, faculty and staff are reported to the OHR.	Finance, Business and Capital Planning	Finance & Business; Police Services	Complete/Substantially Complete Employee Relations established an internal database to manage the employee reports of misconduct. Policies HR99 (<i>Background Check Process</i>) and AD39 (<i>Minors Involved in University-Sponsored Programs or Programs Held at the University and/or Housed in University Facilities</i>) require all employees, or individuals engaged by the University that are working with minors, to self-disclose criminal arrests and/or convictions as outlined in the Penn State Arrest and Conviction self-disclosure form within a 72-hour period of their occurrence. The University's plan for mandatory annual training includes confirmation by employees of their understanding of this requirement.

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6.4.2: Police Incident Reporting Establish or reinforce protocols to assign a timely incident number and proper offense classification to all complaints received.*	Finance, Business and Capital Planning	Police Services	Complete/Substantially Complete Practice was completed in July 2012. Policy was completed in October 2012.
6.4.3: Police Incident Reporting Follow-Up Include the final disposition of each complaint in the original or follow-up report (e.g., founded, unfounded, exceptionally cleared).	Finance, Business and Capital Planning	Police Services	Complete/Substantially Complete This has been the practice and will continue to be done.
6.5: Police Assistance and Conflict of Interest Establish a policy to request assistance from other law enforcement agencies in sensitive or extraordinary cases or where a conflict of interest may exist.	Finance, Business and Capital Planning	Police Services	Complete/Substantially Complete Completed August 2012.
6.6: Police Training Standardization Implement consistent law enforcement standards and practices, through regular training at all Penn State campuses.	Finance, Business and Capital Planning	Police Services	Complete/Substantially Complete Law enforcement standards and practices are consistent at all campuses that have a University Police presence. Certain campuses are policed by local municipal police agencies.
6.7: Investigation of Employees Review and update with the General Counsel, the current policies pertaining to the investigation of various categories of offenses involving Penn State employees.	Finance, Business and Capital Planning	Finance & Business; Police Services	In Progress & On Track The University will develop a policy that confirms the appropriate independence of the University Police in conducting investigations and taking other police actions.
6.8: Child Sexual Abuse Training Provide specialized training to investigators in the area of sexual abuse of children.	Finance, Business and Capital Planning	Finance & Business; Police Services	In Progress & On Track A University Police detective and another officer attended a training session on child sexual abuse and will train other University police officers in December 2012.

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7. Management of Child Programs & Access

RECOMMENDATION	BOARD COMMITTEE	UNIVERSITY DEPARTMENT	STATUS
7.1: Children's Camps Increase the physical security and access procedures in areas frequented by children or used in camps and programs for children.*	Finance, Business and Capital Planning	Outreach; Intercollegiate Athletics	In Process & On Track A group led by the University Police and Public Safety Department developed Policy AD73 (<i>Accessing Athletic and Recreational Facilities</i>). An implementation plan is currently being developed. Existing Policy AD39 (<i>Minors Involved in University Programs or Programs Held at the University and/or Housed in University Facilities</i>) provides clear instructions on the supervision on youth involved in formal programming.
7.2: Mandatory Reporter Training Require and provide abuse awareness and mandatory reporter training to all University leaders, including faculty, coaches and other staff, volunteers and interns.*	Subcommittee on Human Resources	Human Resources	Ongoing/Continuous Under Policy AD39 (<i>Minors Involved in University-Sponsored Programs or Programs Held at the University and/or Housed in University Facilities</i>) and as part of the Pennsylvania Coalition Against Rape/PSU partnership, the Office of Human Resources Center for Workplace Learning and Performance has been leading the development of mandated reporter training and is in the process of developing an on-line interactive training on mandated reporting.
7.2.1: Mandatory Reporter Training Consolidate the responsibility for abuse awareness training and mandatory reporting in the OHR and coordinate an abuse awareness training program throughout the University's campuses.*	Subcommittee on Human Resources	Human Resources	In Progress & On Track Mandated reporter training is being provided, led by the Center for Workplace Learning and Performance, for all Penn State employees and volunteers. Primary focus initially is for authorized adults under Policy AD39 (<i>Minors Involved in University-Sponsored Programs or Programs Held at the University and/or Housed in University Facilities</i>). Training will move to an online format in January 2013. All University employees will be required to complete mandated reporter training each year.
7.3: Oversight of Programs for Minors Consolidate oversight of the University's policies and procedures for programs involving non-student minors in the OHR and appoint a coordinator to oversee the implementation of those policies. The Coordinator should have sufficient authority to:	Finance, Business and Capital Planning	Outreach; Intercollegiate Athletics	In Progress & On Track Discussions are ongoing as to whether the Office of Human Resources is the appropriate office to manage this operational function.
7.3.1: Inventory of Children's Programs Develop and maintain an inventory of all University programs for children.*	Finance, Business and Capital Planning	Outreach; Intercollegiate Athletics	In Process & On Track A comprehensive list of youth related activities are being developed.

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RECOMMENDATION	BOARD COMMITTEE	UNIVERSITY DEPARTMENT	STATUS
7.3.2: AD-39 Update, revise or create policies for unaccompanied children at University facilities, housing and University programs.*	Subcommittee on Human Resources	Human Resources	In Progress & On Track University Policy AD39 (<i>Minors Involved in University-Sponsored Programs or Programs Held at the University and/or Housed in University Facilities</i>) was approved and became effective in June 2012. This policy was revised to include minors involved in University-sponsored programs or programs held at the University facilities. This was in addition to the already established guidelines for programs involving minors housed in University facilities. Key updates to this policy included: background check guidelines for authorized adults, mandated reporter training requirements, self-disclosure of arrests or convictions, requirements for two authorized adults to be present at all times during programs involving minors, as well as guidelines related to communications and transportation of minors. The Employee Benefits group is working with child care vendors to amend contracts to include University Policy AD39 (<i>Minors Involved in University-Sponsored Programs or Programs Held at the University and/or Housed in University Facilities</i>); working with University owned and operated child care facilities to implement University Policy AD39 (<i>Minors Involved in University-Sponsored Programs or Programs Held at the University and/or Housed in University Facilities</i>).
7.3.3: Minor Policy Enforcement Enforce all policies relating to non-student minors involved in University programs at all Penn State campuses.	Audit & Risk	President's Council; Academic Leadership Council	In Progress & On Track This is a priority and will continue to be so in the future. Continued discussion will be held within President's Council and the Academic Leadership Council, with briefings and updates from various University offices as needed (Affirmative Action, Office of Human Resources, etc.). Continued discussion with Commonwealth Campuses, with briefings and updates and in-depth discussion from relevant University offices as needed (Affirmative Action, Office of Human Resources, Risk Management, Legal Counsel, etc.).
7.3.4: Camp and Youth Program Supervision Assist the University's camp and youth program administrators in ensuring that staff and volunteers are appropriately supervised.	Outreach	Outreach	In Progress & On Track All "authorized adults" supervising staff and volunteers will receive annual training by the coordinator or his or her designee (see 7.3 above) to ensure that they have a clear understanding of University Policy AD39 (<i>Minors Involved in University-Sponsored Programs or Programs Held at the University and/or Housed in University Facilities</i>), the required action to take with respect to specific activities and the process for reporting to a higher authority when policies and procedures are not being followed. On an annual basis the ratio of counselors to participants will be evaluated and modified as appropriate.
7.3.5: Parent Information for Youth Programs Provide information to parents of non-student minors involved in University programs regarding the University's safety protocols and reporting mechanisms for suspicious or improper activity.	Finance, Business and Capital Planning	Outreach; Intercollegiate Athletics	In Progress & On Track This recommendation is closely aligned with recommendations 7.3 and 7.3.1.

KEY: [Green – Complete/Substantially Complete] [Blue – Ongoing/Continuous] [Yellow-In Progress & On Track] [Red-Behind Schedule/Intervention Required]

An asterisk (*) indicates that the recommendation is being implemented or has been completed as of June 2012, per the Freeh Report. See page 128 of the Freeh Report.

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8. Monitoring Changes

RECOMMENDATION	BOARD COMMITTEE	UNIVERSITY DEPARTMENT	STATUS
8.1: Internal Monitors Designate an internal monitor or coordinator to oversee the implementation of recommendations initiated, or adopted, by the Board and/or the University administration. The monitor/coordinator would:	All	President; Board of Trustees	Complete/Substantially Complete An Administrative Implementation Team has been charged with overseeing the review and implementation of the recommendations. The team is conducting interviews with those assigned responsibility for analyzing and implementing the recommendations.
8.1.1: Oversight and Implementation of Recommendations Chair a panel of the individuals responsible for developing and implementing these and other approved recommendations and for establishing realistic milestones.	All	Administration; Finance & Business; General Counsel	In Process & On Track See 8.1. The analysis, work plan, milestones and status as recommended by the Administration are being reviewed with an appropriate committee of the Board to provide additional oversight.
8.1.2: Advisory Council Select a practical and diverse number of members of the University community and solicit input from the larger University community, to provide insights and recommendations to the monitor. (See Recommendation 1.0)	All	President; Board Of Trustees	In Process & On Track An Advisory Council, made up of faculty members, chancellors, administrators, staff, students and other University stakeholders, has been formed to review and comment on the work of the Administration. The Vice Chair of the Board of Trustees acts as chair of the Advisory Council. This group will meet bi-weekly to review progress of the implementation effort.
8.1.3: Status Reporting Report actions and accomplishments regularly to the Board of Trustees and University administration.*	All	Administration; Finance & Business; General Counsel	In Process & On Track This will be done on a regular and ongoing basis.
8.2: External Monitor Provide the monitor, or the Chief Compliance Officer, with the authority and resources to hire appropriate external evaluators/compliance auditors to certify that milestones for implementation of these recommendations are being met.	All	President; Board of Trustees	In Progress & On Track The University is considering how best to implement this recommendation.
8.3: Status Reporting Conduct a review of the University's progress 12 months from the acceptance of this report using internal and external examiners and provide the findings to University administrators, the Board and the public.	All	Administration; Finance & Business; General Counsel	In Process & On Track See 8.2.

KEY: [Green – Complete/Substantially Complete] [Blue – Ongoing/Continuous] [Yellow-In Progress & On Track] [Red-Behind Schedule/Intervention Required]

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RECOMMENDATION	BOARD COMMITTEE	UNIVERSITY DEPARTMENT	STATUS
8.4: Status Reporting Conduct a second review of the University's progress 24 months from the acceptance of this report using internal and external examiners and provide the findings to University administrators, the Board and the public.	All	Administration; Finance & Business; General Counsel	In Process & On Track See 8.2.

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