



LIST OF ACTIONS TAKEN BY PENN STATE SINCE 2011:

Clery specific

- Hired in March 2012, Penn State’s first [Clery compliance coordinator](#) to answer centrally to University administration to ensure the institution's overall compliance with the Clery Act and associated regulations at all campuses. One of few universities to have dedicated Clery Compliance Coordinator position. Penn State also hired a second individual dedicated to Clery compliance.
- Formalized and centralized the availability of Clery Act information through the creation of a Clery-designated web site: <http://police.psu.edu/clery>. Found at the site are the following:
 - Online Clery Act training
 - Incident report form
 - Annual Campus Safety and Security Report for every campus
 - Timely warnings
- Created [Policy AD74, “Compliance with the Clery Act”](#), to outline responsibilities and provide whistleblower protection for anyone reporting a crime under the Clery Act.
- In 2014, began using Penn State's PSUAlert emergency messaging system to send timely warnings, in an effort to more closely match the guidelines of the Clery Act. The University now uses text messages and mass emails for all timely warnings.
- Worked with two leading Clery Act organizations in the country – the Clery Center for Security on Campus and Margolis Healy & Associates, a professional services firm specializing in campus security -- to standardize reporting procedures, establish accountability protocols and create guidelines for individuals, including those identified as Campus Security Authorities to ensure compliance for all 23 campuses.

- Created Clery Act maps for 23 campuses to ensure compliance with specified Clery geography.
- Established and implemented policies to facilitate assistance from law enforcement agencies outside of the university when appropriate.
- Reviewed all employees and volunteers within the University to identify who has responsibility to report wrongdoing under the Clery Act, known as a “Campus Security Authority (CSA).” Created a master list of more than 4,000 CSAs and now notify them annually of their Clery Act responsibilities and publish the list to the University community.
- Launched Clery Act training program for employees to increase awareness of the law’s requirements. Both the Clery Act training and mandatory reporter training are [accessible online to the entire University](#). Since 2013, nearly 29,400 people have participated in Clery Act training.
- Established a confidential online incident reporting form to be used to report Clery Act crimes.
- Automated the process to distribute the Annual Security Report (ASR) to all prospective employees and students. In May 2013 – University bylaws were amended to provide Trustees with the annual Clery report.
- Created a Clery Interdisciplinary Team which provides senior level oversight to Clery compliance initiatives.

Sexual misconduct and Title IX

- Established and updated policies — Policy AD 85 - Discrimination, Harassment, Sexual Harassment and Related Inappropriate Conduct (2014, updated in 2016, continually evaluating for further updates.
- Established presidential Task Force on Sexual Assault and Sexual Harassment that launched 18 recommendations aimed at fighting sexual misconduct on all Penn State campuses.

- Developed and implemented a [comprehensive action plan](#) to ensure compliance with Title IX requirements and to address national concern about sexual assault on campuses.
- Created a new, stand-alone Title IX office. Reviewed all policies, programs and protocols related to sexual misconduct and harassment.
- [Hired dedicated Title IX coordinator](#) to oversee many of the University’s initiatives to prevent sexual assault and misconduct.
- Implemented a new process for responding to reports of sexual misconduct that employs a hybrid investigative/hearing model.
- [Hired a new investigative specialist](#) in the Office of Student Conduct to specifically handle cases of sexual misconduct.
- Implementing mandatory training for all employees so they understand the issues involved in sexual misconduct, the resources available, what it means to be a “responsible employee”, and their reporting responsibilities.
- Administered a University-wide climate survey of students to better understand their experiences and views on sexual misconduct and the resources available.
- Held a “Call to Action” to raise awareness about the issues and publicly note the University’s commitment to being a leader in addressing sexual assault and sexual misconduct.
- Implemented bystander intervention training. Teaching students, faculty and staff how to step in and diffuse potentially problematic situations.
- Maintain an online system for anonymous reporting of sexual misconduct. Replaces current sexual assault hotline with a more effective means for receiving reports.

Drug Free Schools and Communities Act

- Developed policy for University-wide compliance: [Policy AD 87](#)— Compliance with the Drug-Free Schools and Communities Act. Establishes the parameters for compliance with the federal law.
- Penn State requires all first-year students to complete an online alcohol education program prior to arrival on campus. In addition to

this first-year requirement, Penn State provides a wide array of drug and alcohol education and intervention programs.

- Penn State requires all students with an alcohol-related Emergency Department visit and/or a first time offense for DUI, public drunkenness or underage drinking to complete the Brief Alcohol Screening and Intervention (BASICS) program.
- Penn State has an off-campus misconduct policy. "Student behavior off the premises of the campus that may have violated any local, state, or federal law, or yields a complaint from others alleging law violations or student misconduct will be reviewed and the student may face sanctions by the University" (Office of Student Conduct website).
- Penn State has a parental notification policy. Parents of any student who is found responsible for an alcohol violation will be notified of the violation, unless the student can prove their independence or has reached the age of 24.

Overall Compliance Initiatives

The University recognizes that Clery Act compliance cannot be an end unto itself, but is rather part of a broader culture of compliance. Compliance is being integrated at the highest levels and following are some related initiatives:

- All other employees are required to obtain a standard background check that must be completed prior to the first day of work/engagement with the University. Since 2011, 98,524 employees have received this background check.
- In March 2013, Penn State hired its first director [of University ethics and compliance](#), who reports to the Legal and Compliance Committee of the Board of Trustees and the Senior Vice President for Finance and Business.
- Created an [Office of Ethics and Compliance](#), and the Ethics and Compliance Council to coordinate, integrate and oversee all University compliance functions.

- Developed [comprehensive compliance and ethics training and education programs](#).
- Established Penn State Hotline where University employees and students can report issues and/or ask questions via phone at 1-800-560-1637 or [online](#).
- Undertook a University-wide effort to promote a “see something, say something” climate and to [enforce the University’s anti-retaliation policy](#).
- Produce quarterly University-wide report from the Office of Ethics and Compliance to highlight University-wide ethics and compliance issues.