

Who's Who

Are You a Campus Security
Authority?

SUNY Student Conduct Institute



Learning Objectives

01

Be Able to Identify
Campus Security
Authorities

- Responsibilities of the
CSA

02

Be Able to Train
Campus Security
Authorities

- Notification &
Education

03

Be Able to
Document Reports
From Campus
Security Authorities

Administrative Capability

Scalable For Different Institutions

- The Secretary's standards of administrative capability require an institution to employ "an adequate number of qualified persons," as well as to ensure that program activities are undertaken with appropriate "checks and balances in its system of internal controls." 34 C.F.R. § 668.16(b)(2); 34 C.F.R. § 668(c)(1)
- An administratively capable institution also must have "written procedures for or written information indicating the responsibilities of the various offices with respect to ... the preparation and submission of reports to the Secretary." 34 C.F.R. § 668.16(b)(4). These standards apply to all aspects of the Title IV program regulations, including the Clery Act.

How to Identify Your CSAs

Multidisciplinary Effort

- Clery Compliance Officer
- Campus Public Safety
- Student Affairs
- Greek Life
- **Human Resources – Verify by Job Description (Recommended Practice)**

Maintain a List of Current CSAs

Contact Information

Archive List of CSAs for 7 Years

Who is a CSA?

(i) Campus Public Safety

(ii) Other Security Personnel

- Access Monitors
- Guards

(iii) Personnel/Offices Institution Directs Crimes to be Reported to

Officials With Specific Responsibilities

34 CFR §668.46(a)

(iv) An ***official*** of an institution who has ***significant responsibility*** for ***student and campus activities***, including, but not limited to, student housing, student discipline, and campus judicial proceedings. If such an official is a pastoral or professional counselor as defined below, the official is not considered a campus security authority when acting as a pastoral or professional counselor.

Professional counselor. A person whose official responsibilities include providing mental health counseling to members of the institution's community and who is functioning within the scope of the counselor's license or certification.

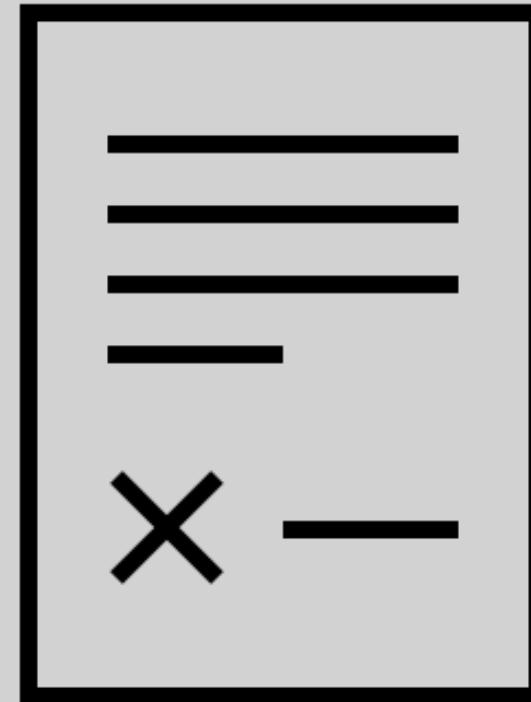
Case Studies

- It is reported to the assistant coach of the men's soccer team that one of his players has been sending her threatening messages via text and social media to another student-athlete at the school. The most recent came in during today's practice on campus.
- A commuter student walked into the Dean of Students office and disclosed to the administrative assistant at the front desk that she had been raped two weeks prior by another student in the parking lot of a remote classroom in a strip-mall.

Identifying a Group IV CSA – A Case-by-Case Assessment

Justify & Document

- Official
 - “holding an office : having authority” (Merriam-Webster)
 - Can Act on Behalf of Institution
- Significant Responsibility
- Campus & Student Activities
 - Student Housing
 - Student Discipline
 - Campus Judicial Proceedings



Campus Security Authorities

- *Not Necessarily an Employee*
 - Ed. Dept. Examples (1999)
 - Director of Athletics
 - Team Coach
 - Faculty Advisor to a Student Group
 - *Not Clerical Staff*
-
- Dean of Students
 - Student Discipline/Integrity
 - Title IX Coordinator
 - Residence Life Director
 - RAs
 - Athletic Director
 - Team Coaches
 - Greek Life

Campus Security Authority (CSA) Do's and Don'ts

- Do Report Allegations of Clery Crimes to Office/Official Designated to Collect Crime Report Information (Clery Compliance Officer)
 - Received in Their Capacity as a CSA, Not in an Indirect Manner
- *Do Provide “Survivors Brochure” When Sexual Misconduct is Reported*
- Don't Investigate
- Don't Try to Apprehend a Suspect
- Don't Try and Convince a Victim to Contact Law Enforcement
 - Can Offer Options & Assistance to Report

Training

- *“While CSA training is not a Title IV requirement per se, it is, for all practical purposes, impossible for an institution to fully comply with the Clery Act without it.”*
- *University of North Carolina-Chapel Hill, Campus Crime Final Program Review Determination (August 23, 2019)*
- *Administrative Capability*

Training

- In-Person/Virtual
 - Recorded
 - Written Notification
 - *Different Options Based on Level of Responsibility*
- What a CSA is
 - Why a CSA is IMPORTANT
 - Part of Crime Prevention Framework
 - Define Clery Geography
 - Define Clery Crimes
 - Where to Report

CSA Reporting

- *Not a Once-a-Year Process*
- Establish a Channel
 - Paper Form (Not Recommended)
 - E-Mail
 - Electronic Form (Best Practice)
- Immediate Review for Timely Warning
- Ongoing Review for Classification & Counting
- Retain for 7 Years
 - Database With Audit Trail

Questions?

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