

Frequently Asked Questions

Reporting Obligations for Campus Security Authority (CSA)

The “**Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act**” is a federal law that requires institutions of higher education in the United States to disclose campus security information (including crime statistics and information about safety-related policies). The Clery Act was named in memory of a student, Jeanne Clery, who was murdered and raped in her dorm room at Lehigh University in 1986. Her attacker was also a student at the University whom Jeanne did not know prior to the attack. Her parents championed laws requiring the disclosure of campus crime information, and the federal law that now bears their daughter's name was enacted in 1990.

The Act is intended to provide current and potential students and their families, as higher education consumers, with accurate, complete and timely information about safety on our campuses or “Clery Act geography” so they can make informed decisions. It is the University, along with all Campus Security Authorities who are responsible for reporting.

What is a Campus Security Authority and how do I know if I am a CSA?

A Campus Security Authority or CSA is defined in the federal regulation as any individual with significant responsibility for student and campus activity, including but not limited to student housing professional staff, student discipline, coaches, campus police and security. Also included are many Rowan employees, who have been designated as a CSA by the head of their unit or school (often a VP or a Dean) in consultation with the Clery Compliance Office. For example: Advisors, Administrators, Deans, Directors, and certain students. You have been notified by the Clery Compliance Office if you have been identified as a CSA due to the function of your position or role you serve for students. Identification is completed through a review process, involving audits being conducted by University departments of their staff and notification of their position through notice from the Clery Compliance Office.

A Campus Security Authority is a mandated reporter to the Clery Compliance Office or other designated University office for reported allegations of Clery Act crimes for inclusion in the annual disclosure of crime statistics. The Clery Act requires all institutions to collect crime reports from a variety of individuals and organizations that are considered to be “Campus Security Authorities” under the law.

Who is a Campus Security Authority?

A Campus Security Authority (CSA) is a Clery Act-specific term that encompasses four groups of individuals and organizations associated with an institution.

- A campus police department or a campus security department of an institution.
- Any individual or individuals who have responsibility for campus security but who do not constitute the campus police department or campus security department.
- Any individual or organization specified in an institution’s statement of campus security policy as an individual or organization to which students and employees should report criminal offenses.
- An official of the University who has significant responsibility for student and campus activities, including, but not limited to, student housing, student discipline and University Leadership. An official is defined as any person who has the authority and the duty to act or respond to particular issues on behalf of the institution.

Some Examples of a Campus Security Authority include but are not limited to:

- Rowan University Police and Security Officers
- Dean of Students Office
- Residential Learning & University Housing professional staff, Community Directors and Community Assistants
- Student conduct (Office of Community Standards) staff
- Student Center & Student Activities staff
- Orientation and Student Leadership Programs staff
- Director of Athletics and Coaches
- Faculty advisors to student groups
- Title IX Coordinator
- Director of Wellness Center
- Victim advocates or others who are responsible for providing victims with advocacy services, such as assisting with housing relocation, disciplinary action or court cases, etc.

Examples of individuals who would not meet the criteria for being a Campus Security Authority include:

- Faculty member who does not have any responsibility for student and campus activity beyond the classroom.
- Professional and Pastoral Counselors
- Clerical or cafeteria staff

Campus “Pastoral Counselors” and Campus “Professional Counselors”:

When acting as such, a pastoral and professional counselor is not considered to be a Campus Security Authority and is not required to report crimes for inclusion in the annual disclosure of crime statistics. The pastoral or professional counselor exemption is intended to ensure that these individuals can provide appropriate counseling services without an obligation to report crimes they may learn about. This exemption is intended to protect the counselor-client relationship. However, even the legally recognized privileges acknowledge some exemptions, and there may be situations in which counselors are in fact under a legal obligation to report a crime. They are encouraged if and when they deem it appropriate to inform person being counseled of the procedures to report crimes on a voluntary basis for inclusion into the annual statistics. Counselors review all options for reporting the crime to appropriate authorities (*for example: Campus Police, Clery Compliance, Student Equity & Compliance*) as well as confidentially reporting the crime for statistical purposes.

- **Pastoral Counselor** is defined as a person who is associated with a religious order or denomination, is recognized by that religious order or denomination as someone who provides confidential counseling and is functioning within the scope of that recognition as a pastoral counselor.
- **Professional Counselor** is defined as 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. This definition applies even to professional counselors who are not employees of the institution but are under contract to provide counseling at the institution.

A Campus Security Authority is identified by the function of their position, through an annual review process, involving audits being conducted by database reviews, University departments of their staff and notification of their position through notice from the Clery Compliance Office. The list of CSAs is maintained by the Clery Compliance Office. Training is provided to Campus Security Authorities (CSAs) through on-line and in-person presentations. The Clery Compliance Officer (856) 256-4562, can assist you with any questions.

Is a Campus Security Authority the same as a Responsible Employee under Title IX?

No. Title IX is the law requiring equal opportunity regardless of gender in the educational environment. Title IX requires that Rowan promptly redress allegations of sexual discrimination and harassment and the law requires that “Responsible Employees” promptly report acts of harassment and discrimination, that come to their attention, to the Office of Student Equity & Compliance for review by the Title IX Coordinator, (856) 256-5830.

A **Responsible Employee** is any employee (full-time, part-time or volunteer) who has the authority to take action to redress sexual harassment. In addition the employee has the duty to report to appropriate school officials sexual harassment or any other student misconduct (i.e., plagiarism, alcohol/drug violations, or other student code of conduct violations); or students would reasonably believe has the aforementioned authority or responsibility. For further information and any questions about Responsible Employees, please contact the Title IX Coordinator. A Responsible Employee, who is also a CSA, is not required to complete an additional CSA report to any required reporting to the Office of Student Equity & Compliance.

What does being a Campus Security Authority mean?

A CSA is responsible for reporting allegations of *Clery Act* crimes that are reported to them in their capacity as a CSA. This means that CSAs are **not** responsible for investigating or reporting incidents that they overhear students talking about in a hallway conversation; that a classmate or student mentions during an in-class discussion; that a victim mentions during a speech, workshop, or any other form of group presentation; or that the CSA otherwise learns about in an indirect manner. CSAs are not responsible for determining whether crime took place, apprehend the alleged perpetrator, or convince a victim to contact law enforcement if the victim chooses not to do so.

What are Clery Act reportable incidents?

A Campus Security Authority is mandated to report the following criminal offenses, hate crimes and Violence Against Women Act incidents that took place on Rowan University "Clery Act" designated geography (as explained further in these FAQs).

Criminal Offenses:

- Aggravated Assault, Arson, Burglary, Robbery, Motor Vehicle Theft (Not a theft from a vehicle)
- Criminal Homicide: These offenses are separated into two categories: Murder and Non-negligent Manslaughter, and Manslaughter by Negligence.
- Sexual Assault (Sex Offenses): Rape, Fondling, Incest and Statutory Rape

Hate Crimes:

A criminal offense that manifests evidence that the victim was intentionally selected because of the perpetrator's bias against the victim. Reportable incidents include any of the previous criminal offenses and any incidents of Larceny/Theft, Simple assault, Intimidation or Criminal Mischief (destruction/damage/vandalism of property)

Bias Categories: Race, Religion, Sexual Orientation, Gender, Gender Identity, Ethnicity, National Origin and Disability

Violence Against Women Act (VAWA Offenses):

- Dating Violence
- Domestic Violence
- Stalking

Arrests and Referrals (referrals are collected from the Office of Community Standards):

- Liquor/Drug law violations
- Weapon law violations

What is Rowan University's Clery Act geography?

For the purpose of collecting statistics for submission to the U.S. Department of Education and for inclusion in the Rowan University Annual Security & Fire Safety Report (ASFSR), Clery geography includes buildings and property that are part of the University's campuses, which include a subset of on-campus student housing where applicable), the University's non-campus buildings or property, and the public property within or immediately adjacent to and accessible

from the campuses. Rowan University has multiple campuses which include the Glassboro Main Campus, West Campus (South Jersey Technology Park), Cooper Medical School of Rowan University (CMSRU), Camden Academic Building (RUCAB), Rowan-Virtua School of Osteopathic Medicine – Stratford and Sewell (Rowan-Virtua SOM), Rowan University at Rowan College of South Jersey-Gloucester and Rowan University at Rowan College of Burlington County. This is further explained as follows:

On-Campus is considered under the Clery Act:

- Any building or property owned or controlled by an institution within the same reasonably contiguous geographic area and used by the institution in direct support of, or in a manner related to, the institution’s educational purposes, including residence halls; and
- Any building or property that is within or reasonably contiguous to the property above that is owned by the institution but controlled by another person, is frequently used by students, and supports institutional purposes (such as a food or other retail vendor).

Note: Statistics for the University’s on-campus student housing are recorded and included in both the on-campus category and the on-campus residential category.

Non-Campus buildings or property is considered under the Act:

- Any building or property owned or controlled by a student organization that is officially recognized by the institution; or any building or property owned or controlled by an institution that is used in direct support of or in relation to the institution’s educational purposes, is frequently used by students, **and is not within the same reasonably contiguous geographic area** of the institution (ex. Certain classes not on the main campus but held at off campus sites, study aboard, off campus trips.)

Note: Off Campus Academic Space Use and Student Travel (Domestic/International)” must be reported to the Clery Compliance Office by completing the form at:

[Confirmation of Off-Campus Domestic/International Student Trip/Academic Space Use](#)

Public Property is considered under the Act:

- All public property, including thoroughfares, streets, sidewalks, and parking facilities, is within the campus or immediately adjacent to and accessible from the campus.
- Does not include property that is not accessible from the on-campus property; for example, if there is a fence between the campus property and the non-campus sidewalk, the sidewalk may not be within the Clery Act geography.

Some examples of public property include:

- Glassboro: Route 322 through the Glassboro Main campus, including the sidewalks on those portions of the road that go through the campus.
- Harrison Twp. /Mantua Twp.: Route 322 through the West Campus (South Jersey Technology Park), including the sidewalks on those portions of the road that go through the campus.
- Stratford: East Laurel Road, including the sidewalks on those portions of the road that border the Rowan-Virtua SOM campus.
- City of Camden: South Broadway and the sidewalks on those portions of the street that are adjacent to the Cooper Medical School of Rowan University (CMSRU).
- City of Camden: Cooper Street and the sidewalks on those portions of the street that are adjacent to the Camden Academic Building (RUCAB).

What are some locations which not included in the Clery Act geography?

- Off-campus locations for internships, externships, clinical training, residencies or student teaching, where the agreement is limited to the program rather than for use of the physical space.
- Field trips (one day) to locations Rowan does not own or control.
- Study Abroad locations or facility that Rowan does not own or control.

How does a Campus Security Authority submit a report of a criminal incident that occurred on the Clery Act geography?

In most cases a CSA will report a criminal incident directly to the Rowan University Police Department in real time when it is occurring on campus, adjacent to campus, or in a non-campus location. If the criminal incident is brought to the CSA's attention later, the form below should be utilized for reporting to the Clery Compliance Office: [Rowan University Campus Security Authority \(CSA\) Reporting Form](#)

Sexual violence, Domestic/Dating Violence, Stalking and Bias/Hate incidents should also be reported to the Rowan Title IX Coordinator (Office of Student Equity & Compliance). The Rowan University Police Department is designated as the official collector of all **crime report information** for all campuses.

As a Campus Security Authority, what steps should be taken to report?

In review:

Step 1 – Obtain and record the facts from the reporting party

Step 2 – Report the facts as completely and accurately as possible to the Rowan University Police Department – directly or in a non-emergency report by using the online CSA Reporting Form.

Be complete on reporting (missing information may result in not properly being able to classify the incident.)

- When (date and time(s) of the occurrence)
- Where (exactly the incident occurred, be specific)
- Who (was involved in the incident)
- What (happened, be specific)

“Special Considerations” in reporting as a Campus Security Authority?

In most cases a CSA will report Clery reportable crimes and incidents directly to the Rowan University Police Department (RUPD), especially if in progress. Or through the on-line CSA Reporting Form in a delayed report where the information is received as outlined in these FAQs. However, there are some special reporting considerations to this process for these specific CSAs:

- **Community Assistants/Community Directors/Residential Learning & University Housing staff:** In most cases, general incidents are reported directly to RUPD and then through the appropriate Maxient reporting form. The Clery Compliance Office receives copies of these reports, which are reviewed for Clery purposes.
- **Rowan University sponsored trips off-campus, or off-site events:** Report it immediately to the law enforcement agency for that location (usually call 911), especially if in progress. Then follow-up by reporting to RUPD and use the online CSA reporting form.
- **Rowan University classes held on the campuses of other Non-Rowan colleges** (ex. Rowan College at Burlington County): Report it immediately to Public Safety/Security at that campus. RUPD is not the responding agency at these non-Rowan campuses. Then follow-up by reporting to RUPD and use the online CSA reporting form.

If a student reported an incident to a Campus Security Authority in confidence, does it still need to be reported for Clery Act purposes?

All incidents which meet the criteria described above must be reported to the Clery Compliance Office for statistical collection purposes. If the victim does not want to submit their name, initials should be used as an identifier in order to avoid double-counting.

In most cases it is possible for a CSA to fulfill his or her responsibilities while still maintaining victim confidentiality. CSA reports are used by the University to compile statistics for Clery Act reporting and to help determine if there is a serious or continuing threat to the safety of the campus community that would require a mass notification (i.e., Rowan Alert or Rowan Timely Warning). Alerting responsibilities can usually be met without disclosing personally identifiable information. A CSA report does not need to automatically result in the initiation of a police or disciplinary investigation if the victim does not want to pursue this action.

Only those CSAs who are professional mental health and pastoral counselors are exempt from the requirement from disclosing reported offenses. This applies only to the information learned while acting in the role of pastoral or professional counselors. Counselors may encourage the student to make a voluntary anonymous report to RUPD, on a confidential basis, or may report the incident with no personal identifiers for inclusion in the annual disclosure of crime statistics.

What fines and sanctions could Rowan receive if a Campus Security Authority fails to report an incident?

- **Monetary Fines:** Colleges and Universities found in violation can be “fined” per incident by the U.S. Department of Education (ED) for any material misrepresentation of information (*what we report, or what we fail to report*).
- **Disqualification:** Non-compliance with the Clery Act can have a negative impact on the University’s ability to receive federal financial aid or qualify for federal grant programs.
- **Reputational Damage:** Clery Act violations can have national attention and consequences. The Department of Education uses adverse publicity to incentivize compliance by other universities.

What are some additional resources for a Campus Security Authority?

- Annual Security and Fire Safety Report: https://sites.rowan.edu/publicsafety/docs/annual_security_report.pdf
- CSA Information: <https://sites.rowan.edu/publicsafety/clery/csa/index.html>
- Office of Community Standards: <https://sites.rowan.edu/communitystandards/index.html>
- Office of Student Equity & Compliance: <https://sites.rowan.edu/diversity-equity-inclusion/departments/osec/index.html>
- Wellness Center: <https://sites.rowan.edu/wellness/index.html>

Questions on the Clery Act:

The Clery Act Appendix for Federal Student Aid (October 2020): This Appendix to the Federal Student Aid Handbook was developed by the U.S. Department of Education to assist postsecondary institutions in meeting the campus safety and security requirements of the Higher Education Act of 1965, as amended. Other than the statutory and regulatory requirements included in this document, the contents of the Appendix do not have the force and effect of law and are not meant to bind the public. The document is intended only to provide clarity to the public regarding existing requirements under the applicable statutory and regulatory provisions.

<https://www2.ed.gov/admins/lead/safety/cleryappendixfinal.pdf>

Rowan University Clery Act Policy: Compliance with Clery Act Policy, PS:2021:02, 9-1-23

<https://confluence.rowan.edu/display/POLICY/Clery+Act+Policy>

NOTE: The CSA FAQs provides you with many resources and links to on line material, which were current as of the time of the release of this overview. Due to upgrades and changes to Rowan websites, links may change over time. If so, please refer to the Rowan University's main web page.

Any questions, please contact the Office of Clery Compliance at (856) 256-4562 or cleryact@rowan.edu.