

## CSU SENSITIVE POSITIONS

Sensitive positions are designated by the CSU as requiring heightened scrutiny of individuals holding the position, based on potential for harm to children, concerns for the safety and security of the people, animals, or property, or heightened risk of financial loss to the CSU or individuals in the university community. Whether a CSU position should be considered sensitive is determined by the duties and responsibilities of the position and not the job title or classification. The campus President is responsible for determining which specific positions at the campus fall into these categories and, if so, what the minimum background check requirements shall be.

The posted position description shall state that the position has been designated to be a sensitive position. In addition to identifying any specific background checks all posted position descriptions for sensitive positions should include an identifier (e.g., checkbox) indicating whether or not the position will have access to Level 1 data.

The table below provides information regarding key duties and responsibilities associated with sensitive positions. In some cases, candidates for those positions must undergo additional types of job-related background checks beyond those required of all new employees. **The list of positions and tasks is illustrative and is not exhaustive.**

Key Duties and Responsibilities	Examples of Occupation/Position	Examples of major position functions or tasks
Responsibility for the care, safety, and security of people (including children and minors), animals	<ul style="list-style-type: none"> <li>▪ Childcare services personnel<sup>1</sup></li> <li>▪ Coaches</li> <li>▪ Camp and Clinic Staff</li> <li>▪ Counseling services</li> <li>▪ Health Care services</li> <li>▪ Public Safety services</li> <li>▪ Recreation related services</li> <li>▪ Healthcare professionals</li> </ul>	<ul style="list-style-type: none"> <li>▪ Provides services for and/or directly works with children and minors</li> <li>▪ Provides student and employee psychological counseling services</li> <li>▪ Provides health care and related services</li> <li>▪ Provides services</li> </ul>
Authority to commit financial resources of the university through contracts greater than \$10,000	<ul style="list-style-type: none"> <li>▪ Contracts and Procurement Managers and Staff</li> <li>▪ Buyers</li> <li>▪ Controllers</li> <li>▪ Financial Managers</li> <li>▪ Administrative Managers</li> </ul>	<ul style="list-style-type: none"> <li>▪ Approves contracts</li> <li>▪ Approves bids and RFP's</li> <li>▪ Approves vendors or products</li> <li>▪ Approves payments</li> <li>▪ Ability to commit funds and services for programs and projects</li> </ul>
Access to, or control on a regular basis of amounts greater than \$10,000 in cash, checks, credit cards, and/or credit card account information	<ul style="list-style-type: none"> <li>▪ Business and Accounting Managers and staff</li> <li>▪ Procurement</li> <li>▪ Collections</li> <li>▪ Cashiers</li> </ul>	<ul style="list-style-type: none"> <li>▪ Transfers, withdraws, and/or deposits money</li> <li>▪ Uses a company-issued credit card to purchase items</li> <li>▪ Handling/receipt of funds</li> </ul>
Possession of building master or sub-master keys for building access, or unsupervised access to CSU property	<ul style="list-style-type: none"> <li>▪ Building Engineers</li> <li>▪ Facilities personnel</li> <li>▪ Custodians</li> <li>▪ Locksmiths</li> <li>▪ Maintenance personnel</li> <li>▪ Other employees who have access to master or sub-master keys for building access</li> </ul>	<ul style="list-style-type: none"> <li>▪ Enters workspaces for maintenance or repair of equipment</li> <li>▪ Works in residences and other facilities for ongoing maintenance</li> <li>▪ Maintains building security</li> <li>▪ Enters facilities for installation and/or cleaning</li> </ul>
Access to controlled or hazardous substances	<ul style="list-style-type: none"> <li>▪ Pharmaceutical personnel</li> <li>▪ Healthcare professionals</li> <li>▪ Custodians</li> <li>▪ Employees with access to hazardous chemicals or controlled substances</li> </ul>	<ul style="list-style-type: none"> <li>▪ Dispenses prescription medication</li> <li>▪ Maintains drug formulary</li> <li>▪ Duties requiring access to controlled substances</li> <li>▪ Uses hazardous chemicals</li> </ul>

<sup>1</sup> Sexual offender registry check required for those who perform work involving regular or direct contact with minor children

Key Duties and Responsibilities	Examples of Occupation/Position	Examples of major position functions or tasks
Access to and responsibility for detailed personally identifiable information about students, faculty, staff, or alumni as defined in CSU Information Security Standards	<ul style="list-style-type: none"> <li>▪ Auditors</li> <li>▪ HR and Payroll Managers and staff</li> <li>▪ Information Technology (IT) personnel</li> <li>▪ Information Systems personnel</li> <li>▪ Programmers</li> <li>▪ Healthcare staff</li> <li>▪ Registrars</li> <li>▪ Employees with access to Level 1 data through campus data centers/systems</li> </ul>	<ul style="list-style-type: none"> <li>▪ Works with Level 1 data as defined under CSU Information Security Standards<sup>2</sup></li> <li>▪ Work requiring access to patient files in a healthcare facility</li> <li>▪ Systems maintenance</li> </ul>
Control over campus business processes, either through functional roles or system security access	<ul style="list-style-type: none"> <li>▪ IT management</li> <li>▪ HR management</li> <li>▪ Information Officers</li> <li>▪ Information Security</li> <li>▪ Business and Finance management</li> </ul>	<ul style="list-style-type: none"> <li>▪ Control over/ability to modify employee, student, financial databases</li> </ul>
Responsibilities that require the employee to possess a license, degree, credential or other certification in order to meet minimum job qualifications and/or to qualify for continued employment in a particular occupation or position <sup>3</sup>	<ul style="list-style-type: none"> <li>▪ Athletic Trainers</li> <li>▪ Attorneys</li> <li>▪ Counselors</li> <li>▪ Diving/Water Safety Professionals</li> <li>▪ Engineers</li> <li>▪ Healthcare professionals</li> <li>▪ Heavy Equipment Operators</li> <li>▪ Pest Control</li> <li>▪ Police Officers</li> </ul>	<ul style="list-style-type: none"> <li>▪ Counsels employees or students</li> <li>▪ Designs or build facilities and offices</li> <li>▪ Provides legal advice</li> <li>▪ Renders medical services</li> </ul>
Responsibility for operating commercial vehicles, machinery or equipment that could pose environmental hazards or cause injury, illness, or death <sup>4</sup>	<ul style="list-style-type: none"> <li>▪ Automotive technicians</li> <li>▪ Equipment operators</li> <li>▪ Environmental health and safety officers</li> <li>▪ Groundskeepers</li> <li>▪ Police officers</li> <li>▪ Transit drivers</li> </ul>	<ul style="list-style-type: none"> <li>▪ Operation of University or commercial vehicles</li> <li>▪ Operation of heavy equipment or machinery</li> <li>▪ Responders to emergencies involving potentially hazardous substances</li> </ul>

In applying this information, campuses must consider factors such as the frequency, nature, and duration of potentially sensitive duties as well as level of supervision. For example, a faculty member’s interactions with students in the classroom or during office hour settings do not constitute *responsibility* for the care, safety, and security of people; therefore, these activities do not make their positions “sensitive.” Likewise, incidental contact with college students who are minors during classes or office hours do not by itself make a faculty position “sensitive.” However, a background check is appropriate when a major portion of the faculty member’s responsibilities involve working directly with minor populations.

In addition, individuals who provide one-time services (e.g., public talks, guest lectures, conference presentations, workshop facilitations) are exempt from the background check requirement. These activities are typically non-sensitive and provide low levels of risk to the organization.

<sup>2</sup> Link: <http://www.calstate.edu/icsuam/sections/8000/8030.0.shtml>

<sup>3</sup> Appropriate professional licensing, certification, and/or credential verification is required

<sup>4</sup> Motor Vehicle Records/Licensing check is required