



(Updated October 2024)

Campus Security Authorities Policy

Under the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act, more commonly known as the Clery Act, a Campus Security Authority (CSA) is defined as an individual who is an official of the institution and has significant responsibility for student and campus activities.¹ New York Law School (NYLS) has designated the following school officials as CSAs:

- Matthew Gewolb, Senior Associate Dean for Academic Affairs and General Counsel
- Michael Siller, Chief Compliance Officer and Counsel
- Dennis DeQuatro, Vice President for Security and Community Affairs
- Oral Hope, Dean of Students and Registrar
- Shani Darby, Assistant Dean for Student Life
- Nina Jody, Co-Title IX Coordinator
- Florence Hutner, Co-Title IX Coordinator
- Paul Repetto, Vice President of Facilities and Building Operations
- Sean Frett, Manager of Security and Life Safety
- All uniformed security personnel

These individuals were designated to be CSAs because they are generally the persons to whom students would ordinarily report issues or concerns regarding campus safety (i.e., campus security personnel, the Office of Student Life, the Title IX co-coordinators) or who are responsible generally for compliance with legal obligations generally and Clery Act requirements specifically (i.e., General Counsel, Chief Compliance Officer, Vice President for Security and Community Affairs and Vice President of Facilities and Building Operations).

¹ 34 CFR § 668.46(a), part of the federal regulations enacted in support of the Clery Act, defines Campus Security Authorities as:

- (i) A campus police department or a campus security department of an institution.
- (ii) Any individual or individuals who have responsibility for campus security but who do not constitute a campus police department or a campus security department under paragraph (i) of this definition, such as an individual who is responsible for monitoring entrance into institutional property.
- (iii) 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.
- (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.

CSA RESPONSIBILITIES

The Clery Act requires institutions of higher education such as NYLS to compile and report, in our annual Campus Security Report, www.nyls.edu/campus-security-and-fire-safety-report, information about all campus crime and fire safety statistics for the past three years as gathered by the Office of Security and Life Safety. The Office of Security and Life Safety shall maintain a daily crime log. Crimes that occur in the following locations shall be recorded in the daily crime log and are subject to the compilation and reporting requirement in the Campus Annual Security Report: (i) on-campus property, (ii) non-campus property,² and (iii) public property that is reasonably contiguous to the Law School.

A crime is reported when a victim, witness, other third party or even the offender brings this crime to the attention of a CSA or local law enforcement personnel. It does not matter whether the individual/s involved in the crime or reporting the crime are associated with the institution.

If a member of the NYLS community reports a crime to a CSA, or if a CSA is made aware of any crime that occurred on campus that may not have been reported to the New York City Police Department (NYPD), the CSA should promptly notify the Chief Compliance Officer, the General Counsel, and the Vice President for Security and Community Affairs. The CSA should call 911 in case of an emergency and promptly inform the Chief Compliance Officer, the General Counsel, and the Vice President for Security and Community Affairs of having done so.

If a campus official (such as a faculty member, administrator, or staff member) who is not a CSA, becomes aware of any crime that occurred on campus, on non-campus property, or on public property (as defined above) they should immediately report it to a CSA.

If a CSA reports information about a crime to the Chief Compliance Officer, General Counsel, and Vice President for Security and Community Affairs (or if any of these school officials have had information about a crime reported directly to them), these school officials will promptly confer. After conferring, if these school officials believe the report was made to a CSA in good faith, one of these school officials will report the crime to the NYPD, unless the victim of the crime has expressed a desire that the crime not be so reported. "In good faith" means there is a reasonable basis for believing that the information is not simply rumor or hearsay. CSAs are not responsible for investigating crimes. Their role is to report all incidents immediately, as detailed above, no matter how minor an incident may seem. All investigations and crime classifications are the responsibility of sworn law enforcement personnel.

Per the NYLS Timely Warning and Emergency Notification Policy, www.nyls.edu/timely-warning-and-emergency-notification-policy, the Vice President for Security and Community Affairs has a responsibility to notify the NYLS community about any crimes that may pose an ongoing threat to the community.

All CSAs will receive annual training regarding their obligations under this Policy.

Questions concerning this Policy may be directed to Chief Compliance Officer and Counsel Michael Siller, at 212-431-2100, x-4408, or msiller@nyls.edu.

² 34 CFR § 668.46(a) defines "Noncampus building or property," as:

- (i) Any building or property owned or controlled by a student organization that is officially recognized by the institution; or
- (ii) 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.