

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

The table below provides information regarding key duties and responsibilities associated with examples of occupations or positions considered sensitive. For each category, additional background check requirements beyond the minimally required background check (employment verification, education verification, reference check, and criminal records check) have been defined. New hires as well as current employees who are newly appointed, transferred, promoted, reassigned, or reclassified into a sensitive position are subject to these requirements. **The list of positions and tasks is illustrative and is not exhaustive.** For example, healthcare professionals include but are not limited to positions such as physician assistants, dentists, nurses, physicians, veterinarians, therapists, medical assistants, and speech pathologists.

Key Duties and Responsibilities	Examples of Occupation/Position	Examples of position functions or task	In addition to the minimally required background check, include:
Responsibility for the care, safety, and security of people (including children and minors), animals, and CSU property	<ul style="list-style-type: none"> <li>▪ Childcare services personnel</li> <li>▪ Coaches</li> <li>▪ Camp and Clinic Counselors and Coaches</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 counseling services</li> <li>▪ Provides health care and related services</li> <li>▪ Has access to computers and other valuable equipment</li> <li>▪ Provides services for and/or work with animals</li> </ul>	Sexual offender registry check for those who perform work involving regular or direct contact with minor children and those who are identified as mandated reporters of child abuse and neglect under Executive Order 1083 and California Penal Code §11165.7(a).
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 over, 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> <li>▪ Employees with access to Level 1 information assets (<a href="#">Level 1 data</a> is "Confidential Information" that include but are not limited to: PINs (Personal Information Numbers), tax IDs with name, Social Security Number and name, health insurance information, biometric information, criminal background check results, electronic or digitized signatures, and private keys (digital certificates).) through campus data centers/systems</li> <li>▪ Other employees whose duties require access to or control over the above information</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>	

Responsibility or access/possession of building master or sub-master keys for building access	<ul style="list-style-type: none"> <li>▪ Building Engineers</li> <li>▪ Facilities personnel</li> <li>▪ Custodians</li> <li>▪ Locksmiths</li> <li>▪ Maintenance personnel</li> </ul>	<ul style="list-style-type: none"> <li>▪ Access to master keys</li> <li>▪ Access to offices for maintenance or repair of equipment</li> <li>▪ Access to residences and other facilities for ongoing maintenance</li> <li>▪ Maintains building security</li> <li>▪ Access to 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>▪ Other faculty or staff 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>▪ Access to drugs</li> <li>▪ Access to potentially hazardous chemicals</li> </ul>	
Access to and responsibility for detailed personally identifiable information about students, faculty, staff, or alumni that is protected, personal, or sensitive	<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>▪ PC Coordinators</li> <li>▪ Student Affairs Officers</li> <li>▪ Counselors</li> <li>▪ Registrars</li> <li>▪ Employees with access to Level 1 information assets (<a href="#">Level 1 Data</a>) through campus data centers/systems</li> </ul>	<ul style="list-style-type: none"> <li>▪ Access to employee records</li> <li>▪ Access to student records</li> <li>▪ Access to personal or other restricted, sensitive or confidential data (e.g., Level 1 data)</li> <li>▪ Access to protected health information</li> <li>▪ Access to restricted data</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	<ul style="list-style-type: none"> <li>▪ Athletic Trainers</li> <li>▪ Attorneys</li> <li>▪ Counselors</li> <li>▪ Diving/Water Safety</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> <li>▪ Renders safety services</li> </ul>	Professional licensing, certification, and/or credential verification
Responsibility for operating commercial vehicles, machinery or equipment that could pose environmental hazards or cause injury, illness, or death	<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>	Motor Vehicle Records/Licensing Check