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Notice of Intended Regulatory Action (NOIRA) Agency Background Document

Agency name	Department of Criminal Justice Services
Virginia Administrative Code (VAC) Chapter citation(s)	6 VAC 20-270
VAC Chapter title(s)	Regulations Relating to Campus Security Officers
Action title	Comprehensive Review and Update of Regulations Relating to Campus Security Officers
Date this document prepared	06/22/2026

This information is required for executive branch review and the Virginia Registrar of Regulations, pursuant to the Virginia Administrative Process Act (APA), Executive Order 19 (2022) (EO 19), any instructions or procedures issued by the Office of Regulatory Management (ORM) or the Department of Planning and Budget (DPB) pursuant to EO 19, the Regulations for Filing and Publishing Agency Regulations (1 VAC 7-10), and the *Form and Style Requirements for the Virginia Register of Regulations and Virginia Administrative Code*.

Brief Summary

Provide a brief summary (preferably no more than 2 or 3 paragraphs) of the subject matter, intent, and goals of this regulatory change (i.e., new regulation, amendments to an existing regulation, or repeal of an existing regulation).

This regulatory action will amend five sections and repeal one section of 6VAC20-270, Rules Relating to Compulsory Minimum Training Standards for Campus Security Officers. The action will also update associated forms and administrative processes by revising eight forms and eliminating two forms that are no longer necessary or relevant. These amendments are intended to ensure that the regulation remains current, reflects statutory requirements, incorporates best practices, and improves the efficiency and clarity of training and certification processes for campus security officers employed in the Commonwealth. The Department of Criminal Justice Services, through the Virginia Center for School and Campus Safety, consulted with an advisory group comprised of campus police chiefs, campus security officers, supervisors, and other relevant stakeholders to identify needed revisions to the regulation and associated forms. The goal of this action is to modernize the regulatory framework, improve administrative efficiency, and ensure that training standards and requirements continue to meet the needs of campus security personnel while supporting public safety objectives.

Acronyms and Definitions

Define all acronyms or technical definitions used in this form.

Board: Criminal Justice Services Board, DCJS' policy board
DCJS: Department of Criminal Justice Services
CJSB: Criminal Justice Services Board, DCJS' policy board
Department: Department of Criminal Justice Services
CSO: Campus Security Officer
VCSCS - Virginia Center for School and Campus Safety

Mandate and Impetus

Identify the mandate for this regulatory change and any other impetus that specifically prompted its initiation, (e.g., new or modified mandate, petition for rulemaking, periodic review, or board decision). For purposes of executive branch review, "mandate" has the same meaning as defined in the ORM procedures, "a directive from the General Assembly, the federal government, or a court that requires that a regulation be promulgated, amended, or repealed in whole or part."

The impetus for this regulatory action is the Department of Criminal Justice Services' statutory responsibility under § 9.1-102(46) of the Code of Virginia to establish and maintain minimum standards for the employment, training, and certification of campus security officers. Following a review of the existing regulation, the Department identified provisions that require updating to ensure consistency with current statutory requirements, operational practices, and administrative processes governing campus security officers in the Commonwealth.

In accordance with § 9.1-102(46), DCJS convened and consulted with an advisory group consisting of college administrators, campus police chiefs, campus security department chiefs, local law-enforcement officials, supervisors, and subject matter experts to evaluate the existing regulation and identify necessary revisions. Based on the advisory group's recommendations and the Department's review, the Criminal Justice Services Board approved the initiation of an emergency regulatory action on October 10, 2024, to consider amendments to 6VAC20-270, including revisions to five regulatory sections, the repeal of one section, and updates to associated forms and administrative requirements. Although it was later determined, in consultation with the Office of the Attorney General, that this action did not meet the requirements for an emergency action, DCJS is moving forward with the regulatory amendments already approved by the Board. There has been no recent mandate or directive from the General Assembly, the federal government, or a court that requires the regulation to be amended or repealed in whole or in part.

Legal Basis

Identify (1) the promulgating agency, and (2) the state and/or federal legal authority for the regulatory change, including the most relevant citations to the Code of Virginia and Acts of Assembly chapter number(s), if applicable. Your citation must include a specific provision, if any, authorizing the promulgating agency to regulate this specific subject or program, as well as a reference to the agency's overall regulatory authority.

The promulgating agency for this regulatory action is the Department of Criminal Justice Services (DCJS). Pursuant to § 9.1-102 of the Code of Virginia, the Department, under the direction of the Board as the policy-making body, is authorized to adopt regulations in accordance with the Administrative Process Act (§ 2.2-4000 et seq.) for the administration of Chapter 1 of Title 9.1. Specific authority for this regulatory action is provided in § 9.1-102(46) of the Code of Virginia, which directs DCJS to establish minimum standards for the employment, job-entry and in-service training curricula, and certification requirements for campus security officers. This regulatory action is undertaken pursuant to that authority to amend and update 6 VAC 20-270, Rules Relating to Compulsory Minimum Training Standards for Campus Security Officers.

Purpose

Describe the specific reasons why the agency has determined that this regulation is essential to protect the health, safety, or welfare of citizens. In addition, explain any potential issues that may need to be addressed as the regulation is developed.

DCJS has determined that this regulation is essential to protecting the safety and welfare of students, faculty, staff, and visitors on college and university campuses throughout the Commonwealth. Pursuant to § 9.1-102(46) of the Code of Virginia, the Department is responsible for establishing minimum standards for the employment, training, and certification of campus security officers. Maintaining current and effective training and certification standards helps ensure that campus security officers possess the knowledge and skills necessary to perform their duties, respond appropriately to emergencies, and contribute to a safe campus environment.

This regulatory action will provided an opportunity to review and update existing requirements to ensure consistency with statutory authority, current operational practices, and stakeholder needs. Through the regulatory process, the Department plans to continue to work with campus security professionals, educational institutions, and other stakeholders to evaluate whether additional revisions are needed to improve clarity, administrative efficiency, training requirements, certification processes, and associated forms. The proposed amendments, already approved by the Board, are intended to promote transparency, consistency, and accountability while supporting the continued effectiveness of campus security programs across the Commonwealth.

Substance

Briefly identify and explain the new substantive provisions that are being considered, the substantive changes to existing sections that are being considered, or both.

This regulatory action will amend five sections of 6 VAC 20-270, Rules Relating to Compulsory Minimum Training Standards for Campus Security Officers, to update training, certification, administrative, and procedural requirements. The amendments being proposed include revisions necessary to align the regulation with current statutory requirements, clarify existing provisions, improve administrative processes, and ensure that training and certification standards remain current and effective. The action will also repeal 6 VAC 20-270-70, which is no longer necessary to the administration of the program, as well as the revision of eight associated forms to improve clarity, accuracy, and usability. In addition, two forms will be

repealed because they are no longer relevant or necessary to support the CSO training and certification program.

Alternatives to Regulation

Describe any viable alternatives to the regulatory change that were considered, and the rationale used by the agency to select the least burdensome or intrusive alternative that meets the essential purpose of the regulatory change. Also, include discussion of less intrusive or less costly alternatives for small businesses, as defined in § 2.2-4007.1 of the Code of Virginia, of achieving the purpose of the regulatory change.

There are no viable alternatives to the regulatory changes that are being proposed, as the updates to this regulation were legislatively mandated and were codified in § 9.1-102(46) in the Code of Virginia, as of several years ago. The changes were not, however, incorporated into the regulatory text at that time, so DCJS is of the belief that there are no alternatives to promulgating these changes. The revisions are neither burdensome nor intrusive to small businesses.

Periodic Review and Small Business Impact Review Announcement

If you wish to use this regulatory action to conduct, and this NOIRA to announce, a periodic review (pursuant to § 2.2-4017 of the Code of Virginia and the ORM procedures), and a small business impact review (§ 2.2-4007.1 of the Code of Virginia) of this regulation, keep the following text. Modify it as necessary for your agency. Otherwise, delete the paragraph below and insert "This NOIRA is not being used to announce a periodic review or a small business impact review."

This NOIRA is not being used to announce a periodic review or a small business impact review.

Public Participation

Indicate how the public should contact the agency to submit comments on this regulation, and whether a public hearing will be held, by completing the text below. In addition, as required by § 2.2-4007.02 of the Code of Virginia, describe any other means that will be used to identify and notify interested parties and seek their input, such as regulatory advisory panels or general notices.

INSERT:

The Department of Criminal Justice Services is providing an opportunity for comments on this regulatory proposal, including but not limited to (i) the costs and benefits of the regulatory proposal, (ii) any alternative approaches, and (iii) the potential impacts of the regulation.

Anyone wishing to submit written comments for the public comment file may do so through the Public Comment Forums feature of the Virginia Regulatory Town Hall web site at: <https://townhall.virginia.gov>. Comments may also be submitted by mail, email or fax to Kristi Shalton, 1100 Bank Street, Richmond, VA 23219, (804) 786-7801, or Kristi.shalton@dcjs.virginia.gov. In order to be considered, comments must be received by 11:59 pm on the last day of the public comment period.

THEN, INSERT EITHER:

A public hearing will not be held following the publication of the proposed stage of this regulatory action.