July 7, 2015

MEMORANDUM

TO: Presidents

FROM: Loren J. Blanchard  
Executive Vice Chancellor for Academic and Student Affairs

SUBJECT: Clarifications to Executive Order 943 Policy on University Health Services

Per the recommendations put forward in the Student Health Services Systemwide Audit Report 13-58, this coded memorandum provides additional clarification to Executive Order 943 Policy on University Health Services. This memorandum clarifies campus responsibilities regarding the provision of health-care related services and specifies Chancellor’s Office oversight responsibilities regarding university health services, including health-related services provided in conjunction with academic degree, certificate, and credential programs and related clinics, internships, preceptorships, and other practical experience and training settings. Additionally this memorandum stipulates systemwide policy relating to campus participation in governmental and other agency programs, student health center participation in educational programs or preceptorships, athletics medicine quality assurance program, and athletic department administration of over-the-counter and prescription medications.

Chancellor’s Office Oversight Responsibilities for University Health Services

The Division of Academic Affairs, Student Academic Support, shall continue to monitor systemwide student health center activities with the assistance of the systemwide student health services advisory committee as outlined in Executive Order 943.

The Division of Academic Affairs, Student Academic Support, shall biennially (every two years) review, with consultation from athletic directors or designees, team physicians and athletic trainers, athletic department compliance with systemwide athletic medicine activities as stipulated in Executive Order 943, Article XIII. Athletic Medicine, and this coded memorandum.

CSU Campuses
- Bakersfield
- Channel Islands
- Chico
- Dominguez Hills
- East Bay

Fresno
- Fullerton
- Humboldt
- Long Beach
- Los Angeles
- Maritime Academy

Monterey Bay
- Northridge
- Pomona
- Sacramento
- San Bernardino
- San Diego

San Francisco
- San José
- San Luis Obispo
- San Marcos
- Sonoma
- Stanislaus
Commencing in fall 2015, the Division of Academic and Student Affairs biennially shall disseminate to campus Presidents updated policies regarding health-care related services provided in association with academic degree programs, certificates, and credentials. Campuses shall investigate and subsequently certify in the following spring term whether campus health care services provided in association with academic degree, credential, and certificate programs meet or exceed all applicable policies, laws and regulations. Reports of areas out of compliance shall include an action plan and timeframe for achieving compliance by the end of that spring term. Certifications shall be submitted to the Division of Academic and Student Affairs, Academic Programs and Faculty Development Department.

Clarifications to Policies and Procedures for University Health Services

Student Health Centers

Government and Other Agency Programs: The following guidelines shall apply when participating in governmental and other agency programs.

- Campuses who wish to apply to become providers for governmental and other agency programs (e.g., Family PACT or Medi-Cal) can do so with the approval of the President or designee.

- Once approved, the campuses will continue to offer all standard basic services at no additional cost to students.

- For fees associated with basic services (see Executive Order 943, section III.D) that have a charge and for augmented services covered under governmental or other agency programs, campuses may offer these services at no additional cost to students, and may then invoice governmental or other agency programs for reimbursement for the services.

- Guidelines in Executive Order 943 for determining reasonable and affordable user fee levels for students must be followed. Student health centers may not bill governmental or other agency programs more than the amount charged to students paying user charges directly.

Educational Training Programs: The student health center may participate in educational training programs (e.g., residency programs, nursing school programs, etc.) that involve the provision of health care as long as student health center staffing, expertise, and resources are appropriate, services to students are not compromised, and legal and scope of practice
requirements as well as the standards of external accrediting organizations are met. Participation in such programs requires the approval of the campus President or designee, and a contract or a memorandum of understanding between the educational entity and the campus that has been approved by the California State University (CSU) Office of General Counsel, as well as oversight by the student health center director or designee. Indemnification should be provided to the student health center by the parent institution of the training program at a level appropriate for the student duties during their rotation schedules. CSU students should be granted priority for their rotations as much as possible.

**Athletic Medicine**

**Quality and Risk Management:** The intercollegiate athletic director shall be responsible for developing a quality assurance program and a risk management program similar to that used by the student health center for health care activities. Intercollegiate athletic departments shall also demonstrate compliance with applicable national athletic association (i.e., National Collegiate Athletic Association and National Association of Intercollegiate Athletics) requirements.

**Administration of Over-the-Counter and Prescription Medications:** The maintenance and dispensing of medications in the athletic training room shall be kept to a minimum essential quantity and purpose described in law and in written policies and procedures for purchase, storage, security, labeling, expiration dates, and record keeping. In addition to the requirements listed in Executive Order 943, section XIII. Athletic Medicine, athletic departments shall comply with the following:

- Only a California licensed physician may be involved in the purchase of prescription items for use in CSU athletic departments. Prescription items must be maintained and administered under the control and direct supervision of a California licensed physician. Certified athletic trainers should not be assigned duties that may be performed only by physicians or pharmacists. A team physician cannot delegate diagnosis, prescription-drug control or prescription-dispensing duties to athletic trainers.

- Over-the-counter medications shall also be limited to the minimum essential quantities and shall be purchased in small, appropriately labeled dispensing packets. Labels should bear the name of the item, the expiration date, and instructions for use. Only medical and certified athletic training staff may dispense these items.
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Campus Health Care Services provided in Association with Academic Degree, Credential, and Certificate Programs

Executive Order 943, sections VII. Qualifications of Providers of Health Care at CSU Campuses, IX. Health Facility Safety and Cleanliness, X. Medical Records, XII. Security of Health Facilities, and XVI. Insurance and Liability Coverage, also govern campus-based and campus-sponsored health-care related services provided in association with academic degree, certificate, and credential programs. Examples of such academic program-related services include, for example, screening, examination, evaluation, assessment, diagnostic test, procedure, clinical research activity, counseling, diagnosis, treatment, counseling, advice, therapy, or rehabilitation provided by university faculty, staff, students or authorized volunteers functioning in a university capacity in clinical, laboratory, therapy or similar settings and associated with academic degree, credential or certificate programs.

The President or designee is responsible for disseminating policy and ensuring regular review of health-services policy compliance in academic program-related health services.

Executive Order 943 is available online at http://www.calstate.edu/EO/EO-943.html.

Questions about student health centers and athletic medicine may be directed to Mr. Ray Murillo, Director, Student Programs, Student Academic Support, at (562) 951-4707 or rmurillo@calstate.edu or Dr. Sabrina Sanders, Assistant Director, Student Programs, Student Academic Support, at (562) 951-4693 or ssanders@calstate.edu.

Questions about campus health care services provided in association with academic degree, credential, and certificate programs may be directed to Dr. Christine Mallon, Assistant Vice Chancellor, Academic Programs and Faculty Development, at (562) 951-4672 or cmallon@calstate.edu.

LJB/rm

c: Dr. Timothy P. White, Chancellor
   Mr. Larry Mandel, Vice Chancellor and Chief Audit Officer
   Mr. Framroze Virjee, General Counsel
   Mr. Eric Forbes, Assistant Vice Chancellor, Student Academic Support
   Dr. Christine Mallon, Assistant Vice Chancellor, Academic Programs and Faculty Development
   Mr. Ray Murillo, Director, Student Programs
   Dr. Sabrina Sanders, Assistant Director, Student Programs
Provosts and Vice Presidents for Academic Affairs
Vice Presidents for Student Affairs
Associate Vice Presidents, Academic Affairs
Deans of Arts and Humanities
Deans of Education
Deans of Graduate Studies
Deans of Health and Human Services
Deans of Liberal Arts
Deans of Social Sciences
Deans of Undergraduate Studies
Directors of Student Health Centers
Directors of Athletics