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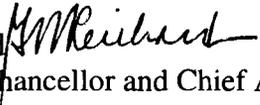
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September 26, 2007

To: Presidents

Code: AA - 2007 - 25

From: Gary W. Reichard 
Executive Vice Chancellor and Chief Academic Officer

Subject: **Third-Party Program Provider Study Abroad and Administrative Safeguards**

California State University campuses have provided a variety of study abroad opportunities for their students. These have traditionally included the systemwide study abroad programs as well as programs sponsored by individual campuses. As interest in international opportunities has increased, CSU campuses have expanded the offerings available to their students. Supplementing both campus-based and systemwide programs are study abroad opportunities offered to students by outside organizations, both non-profit and for-profit. Such third-party program providers offer CSU students a still-wider range of opportunities than can be offered by CSU campuses on their own.

The Chancellor's Office has reviewed CSU campus practices with regard to third-party program providers. This review has revealed no violations of federal or state law or regulations on the part of CSU international offices and personnel. Nevertheless, proper public agency concern for transparency, and for avoiding even the appearance of conflict of interest, has led to the issuance of Executive Order 1022.

This memorandum is issued to further the purposes of Executive Order 1022, and announces additional safeguards designed to promote confidence on the part of our students, the campus community, and the general public that our programs are administered with respect for high ethical standards and best practices.

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

I. Program Provider Lists

CSU campuses are advised to adhere to the following practices, ensuring that student academic and programmatic needs take priority in the creation and administration of a list of approved third party-provided study abroad programs:

1. Campuses that maintain a list of approved programs for student use shall, on the list itself, clearly state all criteria used in deciding to include those programs on the approved list.
 - a. Those criteria should focus on program offerings, student support services, variety in program destination and curricular focus, and risk management issues.
2. The selection of program providers for inclusion on a list shall provide for a systematic consideration, according to uniform criteria and consistent information, of the potential benefits for students as well as the quality of service provided to students and the campus.
 - a. Campuses are encouraged to utilize a consistent process in developing lists of approved programs, and in considering the respective benefits and services provided by program providers.
 - b. Campuses are encouraged to consult broadly with faculty, administration and relevant campus committees in considering a program for approval.
 - c. Approval of a program or agreements with program providers should be signed by the President or designee.
3. In the development of an approved list of program providers, campuses are encouraged to refer to *NAFSA'S Guide to Education Abroad for Advisors and Administrators* (p. 431), as well as to all applicable federal and state statutes and regulations, and existing CSU system and campus policies and procedures.
4. No interaction with third-party program providers shall include any solicitation of financial or other benefits to the campus, or its personnel, in exchange for inclusion on the list.
5. The campus approval process for approved program lists should include a provision for renewal at least once every five years, and campuses should make appropriate updates to the lists and the respective programs and services from each program provider on an annual basis to ensure that the information provided to prospective students remains accurate and current.

II. Campus Practices Relative to Program Providers

The following is to provide specific guidance on unacceptable and acceptable practices.

Unacceptable Practices

No CSU campus, and no employee, or agent of any CSU campus, may:

- Solicit any program provider for financial or other benefits or services to the campus or its personnel;
- Serve as a paid consultant to any program provider or serve in a paid capacity on an advisory board to such a provider;
- Accept any travel paid for by a third-party provider, specifically including travel to study abroad program sites offered by current or prospective program provider partners;
- Enter into an exclusive agreement with a third-party provider whose terms limit or deny access to other programs;
- Accept from any program provider any of the following:
 - Payments or offerings of other benefits in exchange for inclusion on a campus approved program list;
 - Equipment or supplies (including computer software) as a gift or made available at below market rental or cost for use in campus operations;
 - Payment of conference or training registration fees, transportation, or lodging costs for an employee of the campus or campus-affiliated organization;
 - Printing or distribution of catalogs, handbooks, and other official university publications or materials at reduced or no cost;
 - Fees for advertisements in official publications of the campus or financial aid office that are designed to fulfill the institution's requirements to disclose financial assistance and institutional information to enrolled or prospective students;
 - Refreshments or meals for campus meetings or other events intended to promote a specific program.

Acceptable Practices

CSU campuses, and their employees and agents, may accept:

- Fellowships or professional development opportunities for staff or faculty provided by governments or foundations with the intent of increasing knowledge and awareness of education in a region or country;
- Travel, benefits, and/or compensation related to teaching or administration of a program abroad within CSU outside employment guidelines;
- Information materials provided by a program provider that describe their programs and services, provided that the materials and their display or distribution on campus are in conformance with campus time, place and manner regulations governing commercial solicitation (California Code of Regulations, 542350.6);
- Meals, refreshments, and receptions that are scheduled in conjunction with meeting, training or conference events if the meeting or conference involves a broad (e.g. state, regional, national) base of representatives from postsecondary education institutions;
- Meals or refreshments in conjunction with a pre-departure orientation or re-entry event for selected or participating students;
- Promotional prizes or items of nominal value that are offered as a form of generalized marketing or advertising or to create good will;
- Participation of representatives of a program provider in university-sponsored campus activities; and
- Award of student scholarship funds.

Questions related to program providers and study abroad programs may be directed to Leo Van Cleve, Director of International Programs, at (562) 951-4790 or lvancleve@calstate.edu.

c: Dr. Charles B. Reed, Chancellor
Provosts and Vice Presidents, Academic Affairs
Vice Presidents for Student Affairs
Dr. Barry Pasternack, Chair, ASCSU