OFF-CAMPUS ACTIVITIES
SAN DIEGO STATE UNIVERSITY

Audit Report 09-57
October 21, 2009

Members, Committee on Audit
Melinda Guzman, Chair
Raymond W. Holdsworth, Vice Chair
Herbert L. Carter  Carol R. Chandler
Kenneth Fong  Margaret Fortune
George G. Gowgani  William Hauck
Henry Mendoza

Staff
University Auditor:  Larry Mandel
Senior Director:  Michelle Schlack
Audit Manager:  Jim Usher
Senior Auditor:  Wendee Shinsato

BOARD OF TRUSTEES
THE CALIFORNIA STATE UNIVERSITY
## CONTENTS

Executive Summary ................................................................................................................................. 1

Introduction ............................................................................................................................................... 2
  Background ........................................................................................................................................ 2
  Purpose ............................................................................................................................................. 4
  Scope and Methodology ..................................................................................................................... 4

### OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

Study Abroad ........................................................................................................................................ 6
  Agreements ........................................................................................................................................ 6
  Third-Party Study Abroad Agreements .............................................................................................. 7
  Participant Documentation .................................................................................................................. 8

Field Trips ............................................................................................................................................. 9

Community Engagement ..................................................................................................................... 11
  Community Partner Agreements ........................................................................................................ 11
  Site Visits and Participant Documentation ....................................................................................... 12
CONTENTS

APPENDICES

APPENDIX A: Personnel Contacted
APPENDIX B: Campus Response
APPENDIX C: Chancellor’s Acceptance

ABBREVIATIONS

AA  Academic Affairs
CSU  California State University
EO  Executive Order
FY  Fiscal Year
IP  International Programs
OCA  Off-Campus Activities
OIP  Office of International Programs
REP  Resolution of the Committee on Educational Policy
SDSU  San Diego State University
SLA  Service Learning Agreement
EXECUTIVE SUMMARY

As a result of a systemwide risk assessment conducted by the Office of the University Auditor during the last quarter of 2008, the Board of Trustees, at its January 2009 meeting, directed that Off-Campus Activities (OCA) be reviewed. The Office of the University Auditor has never reviewed OCA as a combined subject but certain aspects have received some coverage as part of the Risk Management and Insurance and Student Activities audits in 2003 and 2004, respectively.

We visited the San Diego State University campus from June 8, 2009, through July 10, 2009, and audited the procedures in effect at that time.

Our study and evaluation revealed certain conditions that, in our opinion, could result in significant risk exposures if not corrected. Specifically, the campus did not maintain adequate internal control over the following areas: field trips and community engagement. These conditions, along with other weaknesses, are described in the executive summary and body of this report. In our opinion, except for the effect of the weaknesses described above, the operational and administrative controls of off-campus activities in effect as of July 10, 2009, taken as a whole, were sufficient to meet the objectives stated below.

As a result of changing conditions and the degree of compliance with procedures, the effectiveness of controls changes over time. Specific limitations that may hinder the effectiveness of an otherwise adequate system of controls include, but are not limited to, resource constraints, faulty judgments, unintentional errors, circumvention by collusion, and management overrides. Establishing controls that would prevent all these limitations would not be cost-effective; moreover, an audit may not always detect these limitations.

The following summary provides management with an overview of conditions requiring attention. Areas of review not mentioned in this section were found to be satisfactory. Numbers in brackets [ ] refer to page numbers in the report.

STUDY ABROAD [6]

Delegations of authority to sign agreements for study abroad programs were not documented. Third-party study abroad agreement terms were not always appropriate. In addition, student documentation for study abroad courses/programs was not always complete and available for review.

FIELD TRIPS [9]

Field trip policies and procedures did not address all of the required health and safety issues outlined in California State University systemwide policies nor provide for adequate training or monitoring of department compliance.

COMMUNITY ENGAGEMENT [11]

Appropriate agreements were not consistently used in practicum, internship, and service learning courses. The campus did not consistently perform site visits and orientations, or maintain student documentation for community engagement courses.
INTRODUCTION

BACKGROUND

In 1999, former Governor Gray Davis called for a community service requirement for all students of California’s public higher education institutions. In response, the Board of Trustees passed a Resolution of the Committee on Educational Policy (REP) 03-02-00, Community Service: Responding to the Governor’s Call, which requires campus presidents to ensure that all students have opportunities to participate in community service/service learning. The resolution further required that the chancellor annually report by to the Board of Trustees on efforts to provide those opportunities to all students.

In November 2005, the Board of Trustees also enacted changes to California Code of Regulations, Title 5 §41301, Student Code of Conduct, through REP 11-05-07 that updated expectations and clarified the applicability of the code to off-campus behaviors.

Some Off-Campus Activities (OCA) definitions provided in the 2002 California State University (CSU) publication Best Practices for Managing Risks in Service Learning include:

**Service Learning**

A teaching method that promotes student learning through active participation in meaningful and planned service experiences in the community that are directly related to course content. Through reflective activities, students enhance their understanding of course content, general knowledge, sense of civic responsibility, self-awareness, and commitment to the community.

**Community Service**

Any work provided by individuals that contributes to the quality of life in the community. Community service work can be provided in several ways and for different purposes. Students may be involved in community service on their own, with a group or club, or through academic course work.

Other major OCA components are internships, field trips, study abroad, and student exchange programs.

**Internships**

There is no common, CSU systemwide definition of internships. One campus defines them as follows:

Internships are processes of education, which formally integrate the students' academic study with practical experience in cooperating organizations. Through this interaction of study and practical experience, students enhance their academic knowledge, their personal development, and their professional preparation. The teaching faculty and the on-site supervisors share in the educational process of internship.
Field Trips

Similar to academic internships, the CSU does not specifically define field trips on a systemwide basis. One campus defines field trips as “required activities outside the regularly scheduled classroom/laboratory environment led by the faculty and/or university staff,” while another campus uses a somewhat shorter definition of “supervised, curriculum-related activities held off-campus.”

Study Abroad

Study abroad includes the international programs administered on a systemwide basis in the Office of the Chancellor as well as campus-based programs. In 2009/10, the systemwide international program operated through 19 country sites.

Campuses have authority to establish campus-based, study abroad programs that do not compete with the systemwide program. Campus-based, study abroad programs can be either state-funded or self-supporting. They also have to be short-term (one year or less in duration) and cannot be offered as degree programs. In addition, the continuing or extended education divisions of the campus have to operate the self-supporting study abroad programs.

Student Exchange Programs

Student exchange programs are discussed in Education Code §89705(b) and Executive Order 605, Delegation of Authority to Approve International Student Exchanges, Tuition Waivers for International Students, and Tuition Waivers for Nonresident U.S. Graduate Students, dated July 21, 1993, as:

Agreements with foreign institutions of higher education, governmental agencies, or nonprofit corporations or associations executed by the campuses in order to enhance international goodwill and understanding through the exchange of students.

Various CSU campuses also participate in at least one domestic student exchange program – the National Student Exchange.

In the Office of the Chancellor, the Division of Academic Affairs administers OCA primarily through the Center for Community Engagement and the Office of International Programs. The California State University Risk Management Authority and the Office of Risk Management in the Business and Finance Division at the chancellor’s office also provides some program oversight and certain insurances applicable to OCA. At San Diego State University (SDSU), there are organizational entities involved in OCA similar to the chancellor’s office that report to different vice presidents. The vice president for academic affairs has responsibility for the Office of International Programs. The vice president for administration and finance oversees the Risk Management office that is also involved in OCA by administering foreign travel insurance, establishing field trip guidelines, and assisting in the identification of risks and risk mitigation measures. In addition, student activities in community service at SDSU are coordinated by the Student Life office, which reports to the vice president for student affairs.
PURPOSE

The overall audit objective was to ascertain the effectiveness of existing policies and procedures related to the administration of OCA and to determine the adequacy of controls that ensure compliance with relevant governmental regulations, Trustee policy, Office of the Chancellor directives, and campus procedures.

Within the overall audit objective, specific goals included determining whether:

- Accountability for off-campus functions has been clearly defined and documented including delineation of roles and responsibilities, provisions for formulation of goals/objectives, and measurement of outcomes.
- OCA policies, procedures, and standard forms are current and comprehensive and aligned with relevant federal and state laws/regulations and CSU directives.
- The chancellor’s office and the campuses have established adequate mitigating measures for risks in service learning, community service, academic internships, field trips, study abroad, and student exchange programs.
- Internal controls in service learning, community service, academic internships, field trips, study abroad, and exchange programs operate as intended.
- There is an equitable balance in the number of incoming versus outgoing students in exchange programs.
- Access to automated systems containing OCA information is controlled and limited to authorized users; data backup procedures are in place; and physical security over system hardware is adequate.

SCOPE AND METHODOLOGY

The proposed scope of the audit as presented in Attachment B, Agenda Item 2 of the January 27-28, 2009, meeting of the Committee on Audit stated that Off-Campus Activities includes service learning, study abroad programs, internships, field trips, and club sports. Subsequent to this presentation, the audit of club sports was deferred based on substantial CSU work-in-progress to develop and implement a systemwide club sports manual.

Our study and evaluation were conducted in accordance with the International Standards for the Professional Practice of Internal Auditing issued by the Institute of Internal Auditors, and included the audit tests we considered necessary in determining whether operational and administrative controls are in place and operative. This review emphasized, but was not limited to, compliance with state and federal laws, Board of Trustee policies, and Office of the Chancellor and campus policies, letters, and directives. The audit review focused on procedures in effect for primarily fiscal year 2008/09.
Specifically, we reviewed and tested:

- Identification of risks and implementation of risk mitigation measures for service learning, community service, academic internships, field trips, study abroad, and student exchange programs.

- Service learning best practices including site visits and learning agreements with community partners.

- Involvement with volunteer initiatives.

- Selection and approval of internships.

- Field trip notifications and procedures.

- Execution of study abroad contracts.

- Relationships with study abroad providers.

- Student exchange reciprocity.
OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

STUDY ABROAD

AGREEMENTS

Delegations of authority to sign agreements for study abroad programs were not documented.

Our review of 12 international exchange agreements and six third-party study abroad program agreements disclosed the following:

- Although initial study abroad agreements were signed by the president, subsequent renewals were signed by the assistant vice president of international programs (IP) without a delegation of authority.

- All six of the third-party study abroad program agreements and 1 of the 12 international exchange agreements were signed by the assistant vice president of IP, the dean of undergraduate studies, or the provost without delegation of authority from the president.

- Although 2 of the 12 international exchange agreements reviewed had expired and were not yet renewed, students continued to be exchanged under the agreements.

San Diego State University (SDSU) guidelines for international exchange agreements, maintained by the Office of International Programs (OIP), state that because exchange agreements are legal contracts and affect the entire university, the president authorizes and signs all agreements.

Executive Order (EO) 605, Delegation of Authority to Approve International Student Exchanges, Tuition Waivers for International Students, and Tuition Waivers for Nonresident U.S. Graduate Students, dated July 21, 1993, delegates authority to the campus president or designee to initiate and conduct student international exchange agreements.

EO 1022, Study Abroad Through Non-CSU Program Providers, dated September 24, 2007, delegates authority to the campus president or designee to initiate and conduct study abroad programs with non-CSU providers.

The California State University Policy Manual for Contracting and Procurement §102 requires campus presidents to maintain documentation on delegations of purchasing authority as follows:

Responsibility for the preparation of campus internal policies and procedures consistent with the provision of this manual remains with the campus presidents. Should campus presidents choose to further delegate their purchasing authority, campuses must maintain documentation of such delegation.

The assistant vice president of IP stated his belief that the original agreements that were not signed by the president were all older agreements that were signed before the current campus practice
requiring the president’s signature went into effect. He further stated that he was delegated the
authority to sign renewal agreements; however, he was not aware that this delegation needed to be
documented in writing. He added that the two expired exchange agreements had undergone
negotiation for some time and that his office expects the renewals to be completed shortly.

The absence of appropriate authorizations for study abroad agreements increases the risk of
misunderstandings and potential legal liabilities.

**Recommendation 1**

We recommend that the campus:

a. Determine who should sign international exchange and third-party study abroad agreements and
   complete an official delegation of authority from the president for this purpose.

b. Implement controls to ensure that study abroad agreements are timely renewed.

**Campus Response**

We concur. The campus will:

a. Complete a delegation of authority from the president authorizing the signer for international
   exchange and third-party study abroad agreements. This will be completed by February 26,
   2010.

b. Implement controls to ensure timely renewal of agreements. This will be completed by
   February 26, 2010.

**THIRD-PARTY STUDY ABROAD AGREEMENTS**

The terms of third-party study abroad agreements were not always appropriate.

Our review of six third-party study abroad agreements disclosed that:

- Four of the agreements were renewable indefinitely.

- Two agreements included clauses that could be interpreted as providing compensatory benefits to
  the California State University (CSU). Specifically, terms in these agreements indicated possible
  remuneration for costs associated with travel of CSU personnel to study abroad program sites
  and other financial considerations.

EO 1022, *Study Abroad Through Non-CSU Program Providers*, dated September 24, 2007, states
that in the course of cooperating with a program provider, neither a CSU campus nor any employee
or agent of any CSU campus shall accept payments or other benefits in exchange for being an
approved program.
Academic Affairs coded memorandum AA 2007-25, *Third-Party Program Provider Study Abroad and Administrative Safeguards*, dated September 26, 2007, states that the campus approval process for approved program providers should include a provision for renewal at least once every five years.

The assistant vice president of IP stated that the agreements in question were old agreements that were signed prior to the current CSU requirements going into effect.

Inappropriate terms in study abroad agreements may create an appearance that a conflict of interest exists between the university and its study abroad program providers.

**Recommendation 2**

We recommend that the campus review all third-party study abroad agreements for compliance with CSU systemwide policies and revise the agreements as appropriate.

**Campus Response**

We concur. The compliance review of third-party study abroad agreements will be completed by February 26, 2010.

**PARTICIPANT DOCUMENTATION**

Student documentation for study abroad courses/programs was not always complete and available for review.

Our review of student documentation for 28 study abroad or exchange courses/programs that occurred in calendar year 2008/09 noted the following:

- Student insurance information was not available for review for three of the courses/programs reviewed.
- Liability waivers were not available for review for two of the courses/programs reviewed.
- Not all liability waivers and/or insurance information were present, or were not appropriately completed for five of the courses/programs reviewed.

The SDSU *Study Abroad Handbook* requires students to fill out and return health insurance and liability waiver forms before traveling abroad. In addition, OIP requires all programs traveling to the Tijuana/Baja California border region to meet certain requirements, including attending a pre-departure orientation, purchasing appropriate health insurance, and completing the SDSU study abroad agreement packet.

EO 590, *Student Air Travel*, dated March 26, 1992, requires minimum travel insurance for students and the use of a release of liability waiver for all programs that involve air travel.
EO 998, Study Abroad Programs, dated January 25, 2007, requires students to carry medical insurance that will be valid in the host country(s) for all study abroad programs.

The assistant vice president of IP stated that the courses in question were faculty-led programs that were not run through the International Student Center or the Center for Extended Studies. He also stated that the colleges were responsible for collecting information and retaining the required documents.

Failure to obtain appropriate student insurance information and liability waivers for study abroad courses/programs unnecessarily exposes the university to liability and/or embarrassment and increases the risk of misunderstandings with student participants.

**Recommendation 3**

We recommend that the campus obtain student insurance information and liability waivers for all student participants in study abroad courses/programs.

**Campus Response**

We concur. Procedures will be completed by April 30, 2010, to ensure that insurance information and liability waivers will be obtained for all students participating in study abroad courses/programs.

**FIELD TRIPS**

Field trip policies and procedures did not address all of the required health and safety issues outlined in CSU systemwide policies nor provide for adequate training or monitoring of department compliance.

Our review of 13 classes that involved field trips to off-campus locations during fiscal year (FY) 2008/09 disclosed that:

- For five classes reviewed, the Warning, Waiver and Release of Liability forms were not on file for any of the participant students. The form for one student in an additional class was missing and the Risk Management office had not received the forms for any of the 13 classes reviewed.
- Evidence that the instructors had visited the sites or demonstrated sufficient knowledge of the areas prior to the field trips was not available for six classes.
- The campus did not document that participants had received a detailed instructional agenda that included such items as health/safety information, emergency procedures, and student code of conduct for ten classes.
- For eight classes, there was no documented evidence that student emergency contact information was obtained prior to participation in the field trip.
For one class, guests (e.g., non-student, faculty, or SDSU volunteer) participated in the field trip without completing liability forms.

The SDSU Risk Management office website provides guidelines for field trips requiring the use of a Warning, Waiver and Release of Liability form, which should be forwarded to Risk Management.

EO 715, California State University Risk Management Policy, dated October 27, 1999, states that the campus is responsible to manage and control risks, and that one way in which liability and exposure related to activities linked to the mission of the CSU could be minimized is the use of third-party waivers or hold harmless agreements. Additionally, the policy includes multiple guidelines to control risk in off-campus activities, and states that campus policy should address at a minimum the topics included in the guidelines and include a provision for documenting compliance. These guidelines include, but are not limited to:

- Visit the general area where the activity will be held prior to the field study course or demonstrate sufficient knowledge of the area.
- Prepare a detailed day-to-day instructional agenda including health and safety instructions for all participants.
- Review emergency preparedness processes and the crisis response plan. Distribute a handout for students with emergency phone numbers and contacts.
- Communicate codes of conduct for staff and students.

The associate vice president for academic affairs stated that the colleges were aware of the document requirements for field trips and that efforts to ensure consistent document retention among the colleges could be improved. The risk management officer stated that the scope of her responsibilities involved the general campus insurance program and that the responsibility for waiver forms related to class field trips was the responsibility of the colleges. She further stated that these exceptions were related to academic programming and the responsibility of the professors and their administrative staff under the direction of the college dean.

Failure to maintain appropriate documentation for off-campus field trips unnecessarily exposes participating students to undue risk and increases the potential for loss to the campus and the CSU.

Recommendation 4

We recommend that the campus:

a. Review and update field trip policies and procedures to address CSU systemwide guidelines and provide training to constituents on the revised requirements.

b. Implement a reliable process to monitor and enforce compliance with field trip policies and procedures.
Campus Response

We concur. The campus will review and update field trip policies and procedures, train faculty and staff on the requirements, and implement a process to monitor compliance. This will be completed by April 30, 2010.

COMMUNITY ENGAGEMENT

COMMUNITY PARTNER AGREEMENTS

Appropriate agreements were not consistently used in practicum, internship, and service learning courses.

We reviewed ten student nursing courses, ten student teaching courses, ten academic internship courses, and seven service learning courses for FY 2008/09 and found that:

- Six student nursing agreements did not contain appropriate hold harmless provisions. Additionally, one of these six agreements did not contain appropriate insurance requirements.

- Eight student teaching agreements did not contain appropriate indemnification language.

- Appropriate placement agreements with the community partner were not in place for nine academic internship courses. We found that agreements were not always executed or the agreements did not conform to the campus standard service learning agreement (SLA) and did not contain appropriate insurance and hold harmless language. These courses sent students to over 50 different off-campus locations.

- Placement agreements with the community partner were not on file for five service learning courses. For two additional courses, the agreements on file did not include insurance or indemnification provisions.

The SDSU Contracts and Procurement website states that any time a student is engaged in an off-campus service learning experience in conjunction with a course for credit, a SLA is needed in order to protect the student and the university. The website further provides standard SLA templates.

EO 849, California State University Insurance Requirements, dated February 5, 2003, documents insurance requirements for agreements and contracts. In addition, it states that placement agreements for course-required work experience must be in writing and shall specify minimum insurance requirements applicable to the contracting parties and appropriate hold harmless provisions based on the needs of the contracting parties.

The contracts and procurement manager stated that the departments were informed of the SLA requirement through memos and the Contracts and Procurement website and that the departments are
observing her department that a SLA is needed. She further stated that the standard SLA form used by the campus to comply with CSU’s best practices manual for service learning was recently updated by her office to include the required hold harmless provisions. The contracts and procurement manager also stated that the sampled items might have been older agreements that were executed before this change was made.

Failure to obtain appropriate partner agreements in community engagement arrangements affects student safety and exposes the university to liability and/or embarrassment due to misunderstandings of risks and responsibilities.

**Recommendation 5**

We recommend that the campus:

a. Communicate with colleges and departments to ensure that they are aware of, and are using, the appropriate SLA for community engagements.

b. Review SLAs currently on file for compliance with CSU systemwide requirements and revise them as appropriate.

**Campus Response**

We concur. The campus will:

a. Communicate with colleges and departments to ensure that they are using the appropriate SLAs. This will be completed by April 30, 2010.


**SITE VISITS AND PARTICIPANT DOCUMENTATION**

The campus did not consistently perform site visits and orientations, or maintain student documentation for community engagement courses.

Our review of ten academic internship courses and seven service learning courses from FY 2008/09 disclosed that:

- Evidence that a preliminary site visit was performed or that sufficient familiarity with the community partner existed was not available for six academic internship courses and three service learning courses.

- Students were not provided with appropriate orientation information for eight academic internship courses and three service learning courses. This information could include health/safety instructions, codes of conduct, emergency procedures, and policies, procedures and risks specific to the student activity.
For six academic internship courses and five service learning courses, the Warning, Waiver and Release of Liability forms were not on file for any of the participant students. Students completed the forms for one academic internship course and two service learning courses; however, forms were missing for several other students.

Student placement records were not retained for four service learning courses. Due to this lack of recordkeeping, we were unable to ascertain where the student performed the off-campus service learning activity.

The 2002 CSU publication *Best Practices for Managing Risks in Service Learning* provides for site visits to community-based organizations, orientation presentations, and student placement records.

EO 715, *California State University Risk Management Policy*, dated October 27, 1999, states that the campus is responsible to manage and control risks, and that one way in which liability and exposure related to activities linked to the mission of the CSU can be minimized is using third-party waivers or hold harmless agreements. Additionally, it provides multiple guidelines to control risk in off-campus activities, including:

- Visit the general area where the activity will be held prior to the field study course or demonstrate sufficient knowledge of the area.
- Prepare a detailed day-to-day instructional agenda including health and safety instructions for all participants.
- Review emergency preparedness processes and the crisis response plan. Distribute a handout for students with emergency phone numbers and contacts.
- Communicate codes of conduct for staff and students.

The associate vice president for academic affairs stated that the colleges were aware of the document requirements for academic internships and service learning courses and that efforts to ensure consistent document retention among the colleges could be improved. The risk management officer stated that where SLAs are in place with the community partner, it is her belief that liability waivers are not required since the liability and responsibilities of each party are addressed in the agreements. Additionally, she stated that the colleges are responsible for obtaining the liability waivers when there is no SLA in place with the university.

Failure to visit service learning sites and communicate appropriate information regarding policies, procedures, and risks in community engagement arrangements affects student safety and exposes the university to liability and/or embarrassment due to misunderstandings of risk and responsibilities.

**Recommendation 6**

We recommend that the campus perform site visits and orientations, and maintain student documentation for all community engagement courses.
Campus Response

We concur. The campus will develop procedures to determine whether site visits are required and will document the results. In addition, the campus will conduct student orientations for community engagement courses and retain supporting documents. Procedures will be developed by April 30, 2010.
### APPENDIX A:

#### PERSONNEL CONTACTED

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stephen L. Weber</td>
<td>President</td>
</tr>
<tr>
<td>Cathie Atkins</td>
<td>Associate Dean of Undergraduate Studies, College of Science</td>
</tr>
<tr>
<td>Scott Burns</td>
<td>Associate Vice President, Financial Operations</td>
</tr>
<tr>
<td>Robert Carolin</td>
<td>Assistant Director for Education Abroad, International Student Center</td>
</tr>
<tr>
<td>Kevin Carter</td>
<td>Director, Travel Study</td>
</tr>
<tr>
<td>Valerie Carter</td>
<td>Director, Audit and Tax</td>
</tr>
<tr>
<td>Miriam Castanon</td>
<td>International/Graduate Programs Coordinator, Imperial Valley Campus</td>
</tr>
<tr>
<td>Teresa Cisneros-Donahue</td>
<td>Director, College of Business Administration</td>
</tr>
<tr>
<td>Nancy Flitcraft</td>
<td>Instructional Support Assistant</td>
</tr>
<tr>
<td>Maribel Franco</td>
<td>Study Abroad Coordinator</td>
</tr>
<tr>
<td>Rebekah Fuganti</td>
<td>International Programs Coordinator</td>
</tr>
<tr>
<td>Cathy Garcia</td>
<td>Manager, Contracts and Procurement</td>
</tr>
<tr>
<td>Jim Gerber</td>
<td>Director, International Business Program</td>
</tr>
<tr>
<td>Mozelle Harding</td>
<td>Assistant to the Associate Dean, College of Arts and Letters</td>
</tr>
<tr>
<td>Olita Harris</td>
<td>Associate Dean, College of Health and Human Services</td>
</tr>
<tr>
<td>Jane Kalionzes</td>
<td>Associate Director, International Student Center</td>
</tr>
<tr>
<td>James Lackritz</td>
<td>Associate Dean for Academic Affairs, College of Business</td>
</tr>
<tr>
<td>Kathryn LaMaster</td>
<td>Associate Dean, College of Professional Studies and Fine Arts</td>
</tr>
<tr>
<td>Patricia Lozada-Santone</td>
<td>Assistant Dean for Student Affairs, College of Education</td>
</tr>
<tr>
<td>Janelle Ortiz</td>
<td>Associate Director, Civic Learning and Community Engagement</td>
</tr>
<tr>
<td>Janet Park</td>
<td>Administrator Coordinator II</td>
</tr>
<tr>
<td>Timothy Quinnan</td>
<td>Associate Vice President, Campus Life</td>
</tr>
<tr>
<td>Francesca Ringland</td>
<td>Director, Credit Community Education</td>
</tr>
<tr>
<td>Sally Roush</td>
<td>Vice President, Business and Financial Affairs</td>
</tr>
<tr>
<td>Marti Ruel</td>
<td>Associate Vice President, Student Services</td>
</tr>
<tr>
<td>Rhonda Russell</td>
<td>Risk Management Officer</td>
</tr>
<tr>
<td>Ethan Singer</td>
<td>Associate Vice President, Academic Affairs</td>
</tr>
<tr>
<td>Alan Sweedler</td>
<td>Assistant Vice President, International Programs</td>
</tr>
<tr>
<td>Catherine Todero</td>
<td>Director, School of Nursing</td>
</tr>
<tr>
<td>Jan Wahl</td>
<td>Associate Dean, College of Extended Studies</td>
</tr>
<tr>
<td>Brian West</td>
<td>Buyer</td>
</tr>
</tbody>
</table>
January 8, 2010

Mr. Larry Mandel
University Auditor
The California State University
401 Golden Shore, 4th Floor
Long Beach, CA 90802

Dear Mr. Mandel:

Attached is San Diego State University’s response to Audit Report 09-57, *Off-Campus Activities*. Documentation of policy and control changes will follow under separate cover.

Should you have any questions or require additional information, please contact Valerie Carter, Audit and Tax Director, at (619) 594-5901.

Sincerely,

[Signature]

Stephen L. Weber
President

Attachment

cc: Nancy A. Marlin, Provost
Sally F. Roush, Vice President for Business and Financial Affairs
James Kitchen, Vice President for Student Affairs
Ethan Singer, Associate Vice President, Academic Affairs
Alan Sweedler, Assistant Vice President, International Programs
Scott Burns, Associate Vice President, Financial Operations
Valerie Carter, Director, Audit and Tax
OFF-CAMPUS ACTIVITIES
SAN DIEGO STATE UNIVERSITY
Audit Report 09-57

STUDY ABROAD

AGREEMENTS

Recommendation 1

We recommend that the campus:

a. Determine who should sign international exchange and third-party study abroad agreements and complete an official delegation of authority from the president for this purpose.

b. Implement controls to ensure that study abroad agreements are timely renewed.

Campus Response

We concur. The campus will:

a. Complete a delegation of authority from the president authorizing the signer for international exchange and third-party study abroad agreements. This will be completed by February 26, 2010.

b. Implement controls to ensure timely renewal of agreements. This will be completed by February 26, 2010.

THIRD-PARTY STUDY ABROAD AGREEMENTS

Recommendation 2

We recommend that the campus review all third-party study abroad agreements for compliance with CSU systemwide policies and revise the agreements as appropriate.

Campus Response

We concur. The compliance review of third-party study abroad agreements will be completed by February 26, 2010.
PARTICIPANT DOCUMENTATION

Recommendation 3

We recommend that the campus obtain student insurance information and liability waivers for all student participants in study abroad courses/programs.

Campus Response

We concur. Procedures will be completed by April 30, 2010 to ensure that insurance information and liability waivers will be obtained for all students participating in study abroad courses/programs.

FIELD TRIPS

Recommendation 4

We recommend that the campus:

a. Review and update field trip policies and procedures to address CSU systemwide guidelines and provide training to constituents on the revised requirements.

b. Implement a reliable process to monitor and enforce compliance with field trip policies and procedures.

Campus Response

We concur. The campus will review and update field trip policies and procedures, train faculty and staff on the requirements, as well as implement a process to monitor compliance. This will completed by April 30, 2010.

COMMUNITY ENGAGEMENT

COMMUNITY PARTNER AGREEMENTS

Recommendation 5

We recommend that the campus:

a. Communicate with colleges and departments to ensure that they are aware of, and are using, the appropriate SLA for community engagements.

b. Review SLAs currently on file for compliance with CSU systemwide requirements and revise them as appropriate.
Campus Response

We concur.

a. The University will communicate with colleges and departments to ensure that they are using the appropriate SLAs. This will be completed by April 30, 2010.

b. The University will review, by April 30, 2010, current SLAs for compliance.

SITE VISITS AND PARTICIPANT DOCUMENTATION

Recommendation 6

We recommend that the campus perform site visits and orientations, and maintain student documentation for all community engagement courses.

Campus Response

We concur. The University will develop procedures to determine whether site visits are required and will document the results. In addition, the University will conduct student orientations for community engagement courses and retain supporting documents. Procedures will be developed by April 30, 2010.
February 4, 2010

MEMORANDUM

TO: Mr. Larry Mandel
   University Auditor

FROM: Charles B. Reed
      Chancellor

SUBJECT: Draft Final Report 09-57 on Off-Campus Activities,
         San Diego State University

In response to your memorandum of February 4, 2010, I accept the response as submitted with the draft final report on Off-Campus Activities, San Diego State University.

CBR/amd