

**OFF-CAMPUS ACTIVITIES**  
**CALIFORNIA STATE UNIVERSITY,**  
**SACRAMENTO**

**Audit Report 09-61**  
**February 9, 2010**

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## **ABBREVIATIONS**

AA	Academic Affairs
CEC	Community Engagement Center
CSU	California State University
CSUS	California State University, Sacramento
CUHK	Chinese University of Hong Kong
EO	Executive Order
FY	Fiscal Year
GE	General Education
HR	Human Resources
MOU	Memorandum of Understanding
OCA	Off-Campus Activities
OGE	Office of Global Education
OIG	Outbound International Group
REP	Resolution of the Committee on Educational Policy
RMG	Risk Management Guideline
SAFECLIP	Student Academic Field Experience for Credit Liability Insurance Program

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## **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 California State University, Sacramento (CSUS) campus from August 10, 2009, through September 25, 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: study abroad, field trips, and academic internships. 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 for off-campus activities in effect as of September 25, 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 satisfactory. Numbers in brackets [ ] refer to page numbers in the report.

### **STUDY ABROAD [7]**

State-funded Outbound International Group programs were not always administered and conducted as regular CSUS offerings. Study abroad exchange agreements were not always formalized and certain agreements were either expired or renewable indefinitely. A third-party study abroad provider was represented as an approved provider by one academic program, although there was no official agreement with the provider. Memorandums of understanding with out-of-country providers used in continuing education programs did not contain standard terms and conditions to indemnify and protect students and the university.

### **FIELD TRIPS [11]**

The campus' field trip policies and procedures did not provide for adequate training or monitoring of department compliance. For four courses that used university vehicles as transportation, neither the campus colleges nor the campus risk manager could provide university volunteer forms for students who drove university vans, forms for authorization of these students or of the instructors to drive on university

business, or records of completion of a defensive driving course. This is a repeat finding from the Risk Management and Insurance audit from 2003.

### **COMMUNITY ENGAGEMENT [14]**

The campus had not maintained adequate documentation of site visits and orientations and had not consistently maintained student documentation for service learning. In one internship program, students were not required to complete release of liability waivers.

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## 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 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 class room/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 and independent programs operated by third party providers. 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 provide some program oversight and certain insurances applicable to OCA. At CSUS, 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 Global Education and the Community Engagement Center. The vice president of administration and business affairs oversees Risk Management Services. In addition, some internships and community service activities are coordinated by the Career Center, 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 third party study abroad providers.
- ▶ Student exchange reciprocity.

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## **OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES**

### **STUDY ABROAD**

#### **OUTBOUND INTERNATIONAL GROUP PROGRAMS**

One Outbound International Group (OIG) study abroad program, Engineers Without Borders, was not administered and conducted as a regular offering of California State University, Sacramento (CSUS) and was not credit bearing. Additionally, documentation for student participation in this program was incomplete.

OIG programs occur largely in the summer and are faculty-led, grant-funded and/or self-supporting, CSUS-affiliated programs. The Office of Global Education (OGE) provides oversight of these programs.

Our review of two OIG programs that took place in Summer 2008 found that Engineers Without Borders was not affiliated with any course, and was not credit-bearing.

Our review further disclosed that required study abroad documentation had not been collected for all participants, as follows.

- ▶ Three students did not provide adequate proof of health insurance that would be applicable abroad.
- ▶ Two students did not complete and sign the release and hold harmless statement.
- ▶ One student did not sign the certificate of health form.
- ▶ One student did not sign the authorization for medical treatment.

CSUS procedures for OIG programs require each participant to fill out and sign a statement of health and accident insurance, a certificate of health and medical examination, a release and hold harmless statement, and a statement authorizing emergency medical treatment.

Executive Order (EO) 744, *State-Funded Campus-Based Study Abroad Programs*, dated June 7, 2000, states that if an instructional program in any respect employs appropriated public funds to support its operation, the program is state-funded. State-funded campus study abroad programs must be administered and conducted as regular offerings of the California State University (CSU) campus, and academic offerings must satisfy CSU campus graduation requirements.

EO 590, *Student Air Travel*, dated March 26, 1992, requires 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(ies) for all study abroad programs.

The chief international officer and director of Global Education stated that senior administrators made the decision that OGE would oversee these programs in an effort to ensure that the programs are properly regulated and that risk management is performed for these types of trips abroad. He further stated that although the OGE has created procedures and guidelines for OIG programs, it is difficult to obtain 100 percent compliance from the faculty members who lead the OIG trips.

Using state resources to run self-supporting or non-course related programs increases the risk of public misperceptions. Failure to obtain appropriate participant documentation unnecessarily exposes the university to liability and increases the risk of misunderstanding with student participants.

### **Recommendation 1**

We recommend that the campus:

- a. Transfer responsibility for oversight of grant-funded and self-supporting study abroad programs that are not regular, credit-bearing courses to an appropriate office consistent with CSU systemwide policy.
- b. Improve participant documentation for the Engineers Without Borders program.

### **Campus Response**

We concur. Academic affairs will review and identify campus-sponsored international programs, including self-supporting study abroad programs, grant-supported study abroad programs, travel study programs (no academic credit), and outbound international group programs. Based on this review, actions will be taken to ensure international programs are administered by the appropriate office consistent with CSU policy. Additionally, academic affairs will create a policy regarding the establishment and approval of international programs. This policy will define scope, purposes, procedures, and documentation requirements. Academic affairs will reinforce with the campus community the need to adhere to study abroad documentation requirements. These actions will be completed by August 31, 2010.

## **EXCHANGE AGREEMENTS**

Study abroad exchange agreements were not always current and formalized.

Our review of 17 programs with student exchange activity in fiscal year (FY) 2008/2009 disclosed the following:

- ▶ Three universities and the Regional Academic Mobility Program did not have formal exchange agreements with CSUS on file.
- ▶ Four of the exchange agreements had expired and had not yet been renewed, but students continued to be exchanged under the agreements.

- ▶ Six of the exchange agreements were still in effect; however, they were renewable indefinitely and therefore were between 7 and 21 years old.

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.

Government Code §13402 and §13403 state, in part, that state agencies are responsible for the establishment and maintenance of a system of internal accounting and administrative control. This includes an established system of practices to be followed and an effective system of internal review.

The chief international officer and director of Global Education stated that the programs without agreements were older programs that had been started before detailed guidance on study abroad policies had been published. In addition, he stated that due to a very small staff, the priority has been on student advising and administration, rather than on reviewing older exchange agreements.

The absence of appropriate execution or authorization for student exchange agreements increases the risk of misunderstandings and potential legal liabilities.

### **Recommendation 2**

We recommend that a regular review (at least yearly) be made of exchange agreements in order to ensure that they are current and properly formalized and executed.

### **Campus Response**

We concur. OGE will conduct an annual review of international memoranda of understanding (MOU). As of October 2009, OGE identified the purpose for the annual review and the review criteria to ensure the exchange agreements are current, and properly formalized and executed. By August 31, 2010, the documentation for this process will be finalized.

## **GENERAL EDUCATION HONORS PROGRAM**

The General Education (GE) Honors Program recommended a third-party study abroad provider to students, although the campus had not signed an agreement with the provider.

Our review of the GE Honors Program disclosed that the director of the program recommended a study abroad course at the Chinese University of Hong Kong (CUHK). Although students made their own decision to attend the program at CUHK, the GE Honors Program kept copies of the student applications, passports and visas, and also required the students to provide emergency contact information, a copy of their health insurance information, and a release of liability form. Because the GE Honors Program recommended the non-CSU study abroad course, and became involved in the application process, the CUHK appeared to be a CSUS-approved third-party provider.

EO 1022, *Study Abroad Through Non-CSU Program Providers*, dated September 24, 2007, states that each CSU campus should have a process for approving study abroad program providers and determining whether to enter into an agreement with the program provider. The president or designee has the authority to enter into affiliation agreements with study abroad program providers.

Academic Affairs (AA) Coded Memorandum 2007-25, *Third-Party Program Provider Study Abroad and Administrative Safeguards*, dated September 26, 2007, states that outside organizations can supplement both campus-based and systemwide study abroad opportunities. It further states that approval of a program or agreements with program providers should be signed by the president or designee.

The associate dean of undergraduate studies stated that his knowledge of the quality of the program was the reason that the study abroad course at the CUHK was recommended to GE Honors Program students. He further stated that the GE Honors Program was involved in the student application process, including copying forms and collecting health insurance cards, liability waivers, and emergency contact information to mitigate the risk to the university.

The absence of appropriate agreements with approved third-party study abroad providers increases the risk of misunderstandings and potential legal liabilities.

### **Recommendation 3**

We recommend that the campus consider whether to establish a formal relationship with CUHK. If the campus desires a formal relationship, the president should sign an agreement with CUHK. If not, the application process should be managed by academic affairs in the same manner that all other third-party, independent study abroad programs are administered.

### **Campus Response**

We concur. Academic affairs will review course offerings at CUHK, and determine if this activity constitutes a study abroad program. Based on that review and determination, the campus will take appropriate action regarding the administration of any activity involving CUHK. These actions will be completed by August 31, 2010.

## **CONTINUING EDUCATION AGREEMENTS**

Study abroad agreements for the continuing education program did not contain standard terms and conditions to indemnify and protect CSUS and its students while traveling abroad.

Our review of out-of-country arrangements for continuing education programs found that these were primarily arranged through MOUs with travel agencies or institutions in the host country. These MOUs did not contain standard terms and conditions related to service agreements, such as indemnification or insurance requirements.

*The California State University Policy Manual for Contracting and Procurement* §240.1, revised April 28, 2008, states that it is the campus' responsibility to include, in each contract, terms and conditions necessary to protect the interests of the CSU, comply with applicable laws, reasonably mitigate risks and provide best value to the CSU. It further states that standard terms and conditions have been developed for campus use.

*The California State University Policy Manual for Contracting and Procurement* §702, revised March 19, 2001, states that a memorandum of understanding is used when campuses enter into agreements between themselves.

The director of procurement and contract services stated that the campus believed that the study abroad MOUs fall under the guidelines of student/staff travel and are not subject to standard terms and conditions applied to other contracts.

The absence of appropriate language to protect the university and its students in study abroad agreements affects student safety and exposes the university to liability and/or embarrassment due to misunderstandings of risks and responsibilities.

#### **Recommendation 4**

We recommend that campus procurement and contract services consult with campus risk management and legal counsel to include applicable service agreement terms and conditions and to make any other necessary changes to comply with CSU policy and to protect the interests of the university.

#### **Campus Response**

We concur. By August 31, 2010, financial services will ensure that study abroad agreements for continuing education programs contain standard terms and conditions necessary to indemnify and protect the campus and its students.

## **FIELD TRIPS**

Field trip policies and procedures did not provide for adequate training or monitoring of department compliance.

Our review of 12 courses or programs that held field trips in FY 2008/2009 disclosed the following:

- ▶ For four courses that used university vehicles as transportation, neither the campus colleges nor the campus risk manager could provide university volunteer forms for students who drove university vans, forms for authorization of these students or of the instructors to drive on university business, or records of completion of a defensive driving course. This is a repeat finding from the Risk Management and Insurance audit from 2003.

- ▶ Liability waivers were not provided for three courses. The campus indicated that waivers had been collected, but had been destroyed at the end of the semester. Another course that collected waivers did not have signatures for every student. Additionally, the English Language Institute program used liability waivers, but did not consistently require students to provide their full names and signatures.
- ▶ The campus did not document that it provided participants with detailed written instructions for such items as health/safety information, emergency procedures, and student code of conduct for three courses.
- ▶ Five courses lacked documented evidence that the campus collected student emergency contact information prior to the field trip. The campus indicated that the documentation had been destroyed for three of these courses and had not been collected for the remaining two courses.

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 through the use of third-party waivers or hold harmless agreements. Additionally, the policy includes multiple guidelines to control risk in off-campus activities, including preparation of a detailed day-to-day instructional agenda including health and safety instructions for all participants and review of an emergency preparedness process and the crisis response plan, including emergency phone numbers and contacts.

CSUS Risk Management Guideline (RMG) 02-003, *Field Trip Guideline*, revised October 12, 2005, requires release of liability waivers to be filled out, signed by all participants, and filed in their respective department before departing on the field trip. In addition, it requires a safety briefing to be conducted for students of potential hazards and emergency preparedness.

RMG 02-008, *Driver Authorization Process*, revised May 2006, requires all employees who drive on university business to sign an application for vehicle operation authorization and to send the original to risk management. In addition, a defensive driving course is required every four years if the employee drives on university business more than one time per month or 12 times per year.

*CSU Use of University and Private Vehicles Policies and Regulations*, dated March 2002, states that the campus must ensure compliance with all relevant policies and regulations, including:

- ▶ The requestor is a university employee. Employees include CSU faculty, staff, student assistants, and persons appointed as university volunteers.
- ▶ Written approval of the use has been given by an individual authorized by the president to grant such approval.
- ▶ The requestor has a valid state driver license and maintains a good driving record.

- ▶ The requestor has satisfactorily completed a CSU-approved defensive driving course (if driving on university business more than once a month).

Human Resources (HR) Coded Memorandum 2005-26, *Volunteer Policy*, states that CSU volunteers are required to sign and date CSU volunteer documentation that, at a minimum, contains the following information:

- ▶ Name, address, and telephone number.
- ▶ Emergency contact information.
- ▶ Additional information such as social security number or date of birth to conduct Department of Motor Vehicle checks for volunteers who drive vehicles on state business.
- ▶ Written approval of the use has been given by an individual authorized by the president to grant such approval.

The associate vice president and dean of academic programs stated that field trip administration is the responsibility of the departments and faculty members. He also stated that without clear guidelines on retention of documents, the departments had been unaware that it was necessary to keep liability waivers, driver authorization documentation, and emergency contact information past the end of the semester.

The lack of adequate policy and procedure implementation to control the risks associated with off-campus field trips and driving of university vehicles unnecessarily exposes participating students to undue risk and increases the potential for loss to the campus and the CSU.

### **Recommendation 5**

We recommend that the campus:

- a. Develop retention policies for field trip documentation.
- b. Provide training to constituents on the new retention policies and reiterate existing field trip and driver authorization policies.

### **Campus Response**

We concur. Academic affairs will implement retention procedures regarding field trip documentation. Additionally, training will be provided regarding field trip policies, to include documentation requirements, adherence to driver authorization policies and procedures, and retention requirements. These actions will be completed by August 31, 2010.

## COMMUNITY ENGAGEMENT

### GEOLOGY FIELD CAMPS

The campus did not require the use of site visits or evidence of familiarity with the location, health/safety orientations, liability waivers, or emergency contact information for off-campus geology field camps.

The campus required students pursuing a Bachelor of Science degree in Geology to attend a geology field camp. Since CSUS did not offer this type of camp, the geology department provided a list of pre-approved camps that students could attend, or students could choose another camp after receiving departmental approval. The departmental requirement and pre-approval of the off-campus site lent liability to the campus for students attending these camps.

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 through the use of third-party waivers or hold harmless agreements. Additionally, the policy includes multiple guidelines to control risk in off-campus activities, including:

- ▶ Visit the general area where the activity will be held 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.

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 made 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 chair of the geology department stated that it is a common practice for geology programs to send their students to other university's geology camps. He added that the department had not seen the need for liability waivers since the department considered the field camps to be analogous to courses that students take at other institutions, with the liability borne by the teaching institution.

Failure to obtain liability waivers and to communicate appropriate information regarding risks in off-campus 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 campus risk management review the geology field camp program to determine what measures would best protect the campus from liability and implement these accordingly.

### **Campus Response**

We concur. By the fall 2010 semester, the geology department plans to offer a course that would replace the external field camp requirement. The campus course would adhere to existing field trip policies. These actions will be completed by August 31, 2010.

## **ACADEMIC INTERNSHIPS**

The campus did not consistently perform site visits and orientations, or maintain student documentation for academic internships.

Our review of 20 academic internships that took place in FY 2008/2009 disclosed that:

- ▶ The campus lacked documented evidence of site visits for 17 classes.
- ▶ The campus lacked documented evidence of a briefing or orientation covering such topics as health/safety information, emergency preparedness instructions, and student code of conduct for 12 classes.
- ▶ The campus lacked documentation of executed placement agreements with internship community partners for 19 classes. For the remaining class, all but one student had documented placement agreements on file.
- ▶ Seventeen classes had no signed liability waivers.
- ▶ The campus did not collect emergency contact information for 17 classes.

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 could be minimized is through the use of third-party waivers or hold harmless agreements. Additionally, the policy includes 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.

EO 849, *California State University Insurance Requirements*, dated February 5, 2003, states that placement agreements for course-required work experience must be documented 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 associate vice president and dean of academic programs stated that due to university furloughs and the timing of the audit, it was difficult to gather all of the requested information for the audit. Moreover, departments may not have been aware of administrative oversight and documentation requirements for academic internships because of turnovers in academic positions and inadequate communications of updated procedures related to document retention schedules.

Failure to visit and communicate with internship sites and to maintain appropriate student documentation affects student safety and exposes the university to liability and/or embarrassment due to misunderstandings of risk and responsibilities.

### **Recommendation 7**

We recommend that the campus develop and implement procedures to perform site visits and orientations and maintain student documentation for all community engagement courses.

### **Campus Response**

We concur. Academic affairs will implement procedures related to community engagement courses. These procedures will include site visits, student orientations, and retention of site and student documentation. These actions will be completed by August 31, 2010.

### **SERVICE LEARNING**

The campus had not maintained adequate documentation of site visits and orientations and had not consistently maintained student documentation for service learning courses.

Our review of 11 service learning courses that took place in FY 2008/2009 disclosed that:

- ▶ None of the 33 students in one course signed the release of liability waiver. Three other courses each had one student who signed the release of liability waiver, but only after the service learning had taken place.

- ▶ The campus lacked service learning agreements and documented evidence of site visits for eight of the service learning partners.

CSUS service learning guidelines for faculty require community partners to be selected from organizations that have a service learning agreement with the university, in order to provide risk management coverage for faculty and students. The guidelines also advise faculty to meet with all community partners before sending students to their sites. Guidelines for students require the completion of a liability waiver before commencing service learning activities.

The 2002 CSU publication, *Best Practices for Managing Risks in Service Learning*, provides for site visits to community-based organizations.

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 through the use of third-party waivers or hold harmless agreements.

EO 849, *California State University Insurance Requirements*, dated February 5, 2003, 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 administrative director of the Community Engagement Center (CEC) stated that the CEC forms relationships and visits the site of every approved community partner, and that the CEC requires students to sign liability waivers. She added that faculty who teach service learning courses do not always follow CEC policies and procedures, and the CEC does not have the ability to enforce them.

Failure to visit and communicate with community engagement sites and to maintain appropriate student documentation affects student safety and exposes the university to liability and/or embarrassment due to misunderstandings of risk and responsibilities.

### **Recommendation 8**

We recommend that the campus reinforce the requirement to administer service learning courses through the CEC and remind the colleges and departments to follow CEC policies and procedures.

### **Campus Response**

We concur. Academic affairs will review existing procedures related to service learning courses to ensure inclusion of site visits, student orientations, and retention of site and student documentation. Additionally, academic affairs will reinforce that service learning courses are administered through the CEC, and that colleges and departments must adhere to the applicable policies and procedures. The revised procedures and a campus-wide memorandum will be completed by August 31, 2010.

## **COMMUNITY SERVICE**

The campus did not use release of liability waivers for the Sutter Volunteer Program.

The Sutter Volunteer Program, sponsored by the Career Center, places approximately 30-60 student volunteers per semester at local hospitals. Our review of student documentation for five students who participated in the Sutter Volunteer Program in FY 2008/2009 found that the campus did not collect liability waivers from these students.

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 through the use of third-party waivers or hold harmless agreements.

The associate director of the Career Center stated that risk management provided guidance regarding liability coverage for students when the Sutter Volunteer Program was implemented in August 2007. Risk management indicated that the insurance program, the Student Academic Field Experience for Credit Liability Insurance Program (SAFECLIP), was a blanket policy for all students participating in internship-like programs. SAFECLIP was first available as of July 2007. The Career Center did not complete liability waiver forms, since they deemed these students were covered under SAFECLIP.

Failure to obtain release of liability waivers exposes the university to liability and/or embarrassment due to misunderstandings of risk and responsibilities.

### **Recommendation 9**

We recommend that all campus-sponsored volunteer and community service programs require students to fill out release of liability waivers before participating in these programs.

### **Campus Response**

We concur. As of January 2010, the Career Center required that students participating in the Sutter Volunteer Program complete and submit a release of liability form prior to participation in the program. By August 31, 2010, the Career Center will ensure that release of liability forms will be completed and submitted for students participating in campus-sponsored volunteer and community service programs coordinated by the Career Center.

Additionally, by August 31, 2010, academic affairs will reinforce that campus-sponsored volunteer and community service programs must adhere to student documentation requirements.

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## **APPENDIX A: PERSONNEL CONTACTED**

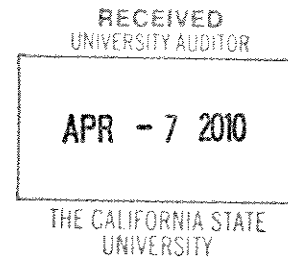
<u>Name</u>	<u>Title</u>
Alexander Gonzalez	President
Bonnie Burnell	Director, Business Student Services – College of Business
Michael Christensen	Interim Assistant Vice President, Risk Management Services
Brigitte Clark	Associate Director, Career Center
Felice Dinsfriend	Financial Services Manager, College of Continuing Education
Dave Evans	Chair, Geology Department
Monica Freeman	Coordinator, International Programs
Stephen Garcia	Vice President for Administration and Business Affairs
Jack Godwin	Chief International Officer and Director, Global Education
Bernadette Halbrook	Interim Associate Dean, College of Continuing Education
Deborah Hansen	Program Coordinator, College of Continuing Education
Yavette Hayward	Senior Management Auditor
Justine Heartt	Interim Associate Vice President, Financial Services
Mike Lee	Associate Vice President and Dean for Academic Programs
Sheila Macias	Administrative Director, Community Engagement Center
Jill Matsueda	Senior Program Manager, College of Continuing Education
Manuela McClary	Senior Program Coordinator, College of Continuing Education
Kathi McCoy	Director, Auditing Services
Brendan McVeigh	Community Partnerships Coordinator, Community Engagement Center
Beth Merritt-Miller	Director Academic Advising and Career Center
Roberto Pomo	Director, General Education Honors Program
David Shannon	Director, Procurement and Contract Services
Janis Silvers	Study Abroad Advisor
Barbara Sloan	Associate Director, Outreach, Admissions and Records
Kirtland Stout	Interim Risk Manager
Alice Tom	Dean, College of Continuing Education
Jing Wang	Director of Institutional Research
Gregory Wheeler	Associate Dean, Undergraduate Studies



California State University, Sacramento  
Office of the Vice President for Administration  
6000 J Street • Sacramento Hall 272 • Sacramento, CA 95819-6038  
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April 6, 2010

Larry Mandel  
University Auditor  
The California State University  
401 Golden Shore  
Long Beach, CA 90802-4210



Subject: Campus Response to Recommendations of Off Campus Activities Audit,  
Report #09-61

Dear Mr. Mandel:

Please find enclosed California State University, Sacramento's response to the recommendations of the audit. The campus is committed to addressing and resolving the issues identified in the audit report.

If you have any questions or require additional information, please contact Kathi McCoy, Director of Auditing Services, at 916 278-7439.

Sincerely,

Stephen G. Garcia  
Vice President & Chief Financial Officer

SGG: sf

Attachment

cc: David Evans, Chair of Geology Department  
Jack Godwin, Chief International Officer, and Director of Global Education  
Alexander Gonzalez, President  
Justine Heartt, Interim Associate Vice President for Financial Services  
Ming-Tung Lee, Associate Vice President and Dean for Academic Programs  
Sheila Macias, Director of Community Engagement Center  
Kathi McCoy, Director, Auditing Services  
Beth Merritt Miller, Director, Academic Advising and Career Center  
Ed Mills, Associate Vice President for Enrollment and Student Support  
Joseph Sheley, Vice President for Academic Affairs and Provost  
Donald Taylor, Director of Academic Programs and Global Engagement  
Jill Trainer, Dean, College of Natural Sciences and Mathematics  
Lori Varlotta, Vice President for Student Affairs

**OFF-CAMPUS ACTIVITIES**  
**CALIFORNIA STATE UNIVERSITY,**  
**SACRAMENTO**

**Audit Report 09-61**

**STUDY ABROAD**

**OUTBOUND INTERNATIONAL GROUP PROGRAMS**

**Recommendation 1**

We recommend that the campus:

- a. Transfer responsibility for oversight of grant-funded and self-supporting study abroad programs that are not regular, credit-bearing courses to an appropriate office consistent with CSU systemwide policy.
- b. Improve participant documentation for the Engineers Without Borders program.

**Campus Response**

We concur. Academic Affairs will review and identify campus-sponsored international programs, including self-supporting study abroad programs, grant-supported study abroad programs, travel study programs (no academic credit), and outbound international group programs. Based on this review, actions will be taken to ensure international programs are administered by the appropriate office consistent with CSU policy.

Additionally, Academic Affairs will create a policy regarding the establishment and approval of international programs. This policy will define scope, purposes, procedures, and documentation requirements. Academic Affairs will reinforce with the campus community the need to adhere to study abroad documentation requirements. These actions will be completed by August 31, 2010.

**EXCHANGE AGREEMENTS**

**Recommendation 2**

We recommend that a regular review (at least yearly) be made of exchange agreements in order to ensure that they are current and properly formalized and executed.

### **Campus Response**

We concur. Office of Global Education (OGE) will conduct an annual review of international memoranda of understandings (MOU). As of October 2009, OGE identified the purpose for the annual review, and the review criteria to ensure the exchange agreements are current, and properly formalized and executed. By August 31, 2010, the documentation for this process will be finalized.

## **GENERAL EDUCATION HONORS PROGRAM**

### **Recommendation 3**

We recommend that the campus consider whether to establish a formal relationship with CUHK. If the campus desires a formal relationship, the president should sign an agreement with CUHK. If not, the application process should be managed by academic affairs in the same manner that all other third-party, independent study abroad programs are administered.

### **Campus Response**

We concur. Academic Affairs will review course offerings at CUHK, and determine if this activity constitutes a study abroad program. Based on that review and determination, the campus will take appropriate action regarding the administration of any activity involving CUHK. These actions will be completed by August 31, 2010.

## **CONTINUING EDUCATION AGREEMENTS**

### **Recommendation 4**

We recommend that campus procurement and contract services consult with campus risk management and legal counsel to include applicable service agreement terms and conditions and to make any other necessary changes to comply with CSU policy and to protect the interests of the university.

### **Campus Response**

We concur. By August 31, 2010, Financial Services will ensure that study abroad agreements for continuing education programs contain standard terms and conditions necessary to indemnify and protect the campus and its students.

## **FIELD TRIPS**

### **Recommendation 5**

We recommend that the campus:

- a. Develop retention policies for field trip documentation.

- b. Provide training to constituents on the new retention policies and reiterate existing field trip and driver authorization policies.

**Campus Response**

We concur. Academic Affairs will implement retention procedures regarding field trip documentation. Additionally, training will be provided regarding field trip policies, to include documentation requirements, adherence to driver authorization policies and procedures, and retention requirements. These actions will be completed by August 31, 2010.

**COMMUNITY ENGAGEMENT**

**GEOLOGY FIELD CAMPS**

**Recommendation 6**

We recommend that campus risk management review the geology field camp program to determine what measures would best protect the campus from liability and implement these accordingly.

**Campus Response**

We concur. By the fall 2010 semester, the Geology Department plans to offer a course that would replace the external field camp requirement. The campus course would adhere to existing field trip policies. These actions will be completed by August 31, 2010.

**ACADEMIC INTERNSHIPS**

**Recommendation 7**

We recommend that the campus develop and implement procedures to perform site visits and orientations and maintain student documentation for all community engagement courses.

**Campus Response**

We concur. Academic Affairs will implement procedures related to community engagement courses. These procedures will include site visits, student orientations, and retention of site and student documentation. These actions will be completed by August 31, 2010.

## **SERVICE LEARNING**

### **Recommendation 8**

We recommend that the campus reinforce the requirement to administer service learning courses through the CEC and remind the colleges and departments to follow CEC policies and procedures.

### **Campus Response**

We concur. Academic Affairs will review existing procedures related to service learning courses to ensure inclusion of site visits, student orientations, and retention of site and student documentation. Additionally, Academic Affairs will reinforce that service learning courses are administered through the CEC, and that colleges and departments must adhere to the applicable policies and procedures. The revised procedures and a campus-wide memorandum will be completed by August 31, 2010.

## **COMMUNITY SERVICE**

### **Recommendation 9**

We recommend that all campus-sponsored volunteer and community service programs require students to fill out release of liability waivers before participating in these programs.

### **Campus Response**

We concur. As of January 2010, the Career Center required that students participating in the Sutter Volunteer Program complete and submit a release of liability form prior to participation in the program. By August 31, 2010, the Career Center will ensure that release of liability forms will be completed and submitted for students participating in campus-sponsored volunteer and community service programs coordinated by the Career Center.

Additionally, by August 31, 2010, Academic Affairs will reinforce that campus-sponsored volunteer and community service programs must adhere to student documentation requirements.

THE CALIFORNIA STATE UNIVERSITY  
OFFICE OF THE CHANCELLOR



BAKERSFIELD

May 5, 2010

CHANNEL ISLANDS

CHICO

**MEMORANDUM**

DOMINGUEZ HILLS

EAST BAY

TO: Mr. Larry Mandel  
University Auditor

FRESNO

FROM: Charles B. Reed  
Chancellor

FULLERTON

HUMBOLDT

SUBJECT: Draft Final Report 09-61 on *Off-Campus Activities*,  
California State University, Sacramento

LONG BEACH

LOS ANGELES

In response to your memorandum of May 5, 2010, I accept the response as submitted with the draft final report on *Off-Campus Activities*, California State University, Sacramento.

MARITIME ACADEMY

MONTEREY BAY

NORTHRIDGE

CBR/amd

POMONA

SACRAMENTO

SAN BERNARDINO

SAN DIEGO

SAN FRANCISCO

SAN JOSÉ

SAN LUIS OBISPO

SAN MARCOS

SONOMA

STANISLAUS