

OFF-CAMPUS ACTIVITIES

SYSTEMWIDE

Audit Report 09-54

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ABBREVIATIONS

AA	Academic Affairs
CSU	California State University
EO	Executive Order
GC	Government Code
ICSUAM	Integrated CSU Administrative Manual
MYSLP	My Service Learning Placement
NSE	National Student Exchange
OCA	Off-Campus Activities
REP	Resolution of the Committee on Educational Policy
SEARS	Social Behavioral Research Institute
SNAPS	Student Needs and Priorities Survey

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 nine campuses from April 13, 2009, through November 20, 2009, and audited the procedures in effect at that time. Campus-specific findings and recommendations have been discussed and reported individually. Some areas of systemwide concern include policy clarity and completeness, knowledge of existing policies, and the absence of systems to effectively monitor policy compliance.

Our study and evaluation revealed certain conditions that, in our opinion, could result in significant risk exposures if not corrected. Specifically, adequate internal controls were not in place in key areas at the campus level. 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 November 20, 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.

GENERAL ENVIRONMENT [7]

Systemwide policies and procedures for OCA administration were inadequate in multiple areas discussed throughout this report. Acceptance of digital signatures from students on participation consent forms for off-campus activities has started in the California State University (CSU) without adequate systemwide policies or use of an approved methodology.

STUDY ABROAD [9]

Student documentation for study abroad courses/programs was not always complete or consistently obtained and the execution and maintenance of study abroad/exchange program agreements needed improvement at all nine campus visited. Reciprocity in student exchange programs needed improvement at five of the nine campuses visited. The CSU has not adequately addressed requirements when students travel independently to/from study abroad and international exchange program locations.

FIELD TRIPS [15]

Systemwide policies for field trips were outdated and did not address record retention of field trip documents. Administration of field trips at most campuses was highly decentralized without a system for adequate training or monitoring of compliance.

COMMUNITY ENGAGEMENT [18]

Processes for accumulating and validating service learning statistical estimates were inefficient and potentially error-prone. Implementation of service learning best practices needed improvement. The campuses did not consistently maintain documentation for internships.

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. 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 the campus level, there are organizational entities involved in OCA similar to the chancellor’s office that report to different vice presidents.

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.

During the course of the audit, we visited nine campuses: Bakersfield, Fullerton, Humboldt, Los Angeles, Northridge, Pomona, Sacramento, San Diego, and San Jose. We interviewed campus personnel and audited procedures in effect at the time of audit.

OBSERVATIONS, RECOMMENDATIONS, AND MANAGEMENT RESPONSES

GENERAL ENVIRONMENT

POLICY FRAMEWORK

Systemwide policies and procedures for administration of off-campus activities (OCA) were inadequate in multiple areas discussed throughout this report.

At the campuses visited and in the chancellor's office, we found numerous OCA policy issues involving various academic and administrative operating units with different reporting lines. The traditional system of executive orders and coded memorandums augmented with campus policies and procedures was incoherent, ineffective, and subject to:

- ▶ Incomplete, outdated or unclear policies and procedures.
- ▶ Policies and procedures not being communicated and disseminated.
- ▶ A lack of policy and procedure training for appropriate faculty and staff.

A separate systemwide initiative already underway pertaining to the development of the Integrated California State University Administrative Manual (ICSUAM) may provide a model for OCA policies. Thus far, ICSUAM has emphasized financially related policies and procedures. The California State University (CSU) has not adopted an ICSUAM-type document for non-financial policy matters.

Government Code (GC) §13402 and §13403 require a system or systems of internal accounting and administrative controls so that reasonable assurances can be given that measures to safeguard assets, check the accuracy and reliability of accounting data, promote operational efficiency, and encourage adherence to prescribed managerial policies are being followed.

Failure to implement, communicate, provide training, and update appropriate OCA policies and procedures increases the risk of misunderstandings, inconsistencies in compliance, and undue risk exposures.

Recommendation 1

We recommend that the chancellor's office consider revising the process for OCA policy formulation and dissemination to include consolidation of OCA policies, improvement in OCA policy distribution, training for all appropriate staff on OCA policies, and establishment of a specific means for future review and maintenance of OCA systemwide policies.

Management Response

We concur. Academic Affairs (AA) will designate staff to be responsible for policy development and review to be posted on an OCA website. This site will also aggregate policies related to the various activities under this rubric. Finally, AA will develop a plan for distribution and training in these areas. This will be completed by August 1, 2011.

RELEASE FORM/DIGITAL SIGNATURES

Acceptance of digital signatures from students on participation consent forms for off-campus activities has started in the CSU without adequate systemwide policies or use of an approved methodology.

Signing a consent form is a general prerequisite for students to participate in off-campus activities such as service learning. There were a number of different legacy forms in use for this purpose at the campuses visited. The CSU has recently completed a *Release of Liability, Promise Not To Sue, Assumption of Risk and Agreement to Pay Claims* form intended to consolidate and supersede all previously used documents; however, it has not yet been distributed as official CSU systemwide policy.

One campus of the nine campuses visited was particularly advanced in allowing students to sign participation consent forms for service learning electronically through its student portal. This campus makes a persuasive case that obtaining student participation consent via digital signatures through the portal is a good use of technology, as students already use the portal application for other purposes, including online registration and accepting financial aid offers.

The older online participation consent forms and the newer *Release of Liability, Promise Not To Sue, Assumption of Risk and Agreement to Pay Claims* form contain certain representations and understandings with potential financial and legal ramifications that require a student signature and date and if the student is under 18 years old, a signature and date by a parent or guardian.

GC §16.5 and California Code of Regulations §22000 address digital signatures and regulations for acceptance of such signatures which include use of a methodology approved by the California Secretary of State.

Adoption of a systemwide digital signature policy has been drafted in the ICSUAM initiative, but it has not yet been finalized and issued.

The inconsistent use of student consent forms and absence of digital signatures unnecessarily exposes the university to liability and/or embarrassment, increases the risk of misunderstandings with student participants, and potentially compromises evidence in claims/litigation.

Recommendation 2

We recommend that the chancellor's office:

- a. Establish a systemwide policy requiring use of the *Release of Liability, Promise Not To Sue, Assumption of Risk and Agreement to Pay Claims* form for students participating in off-campus activities.
- b. Finalize a systemwide digital signature policy and specifically clarify whether electronic acknowledgments by students of the *Release of Liability, Promise Not To Sue, Assumption of Risk and Agreement to Pay Claims* forms through student portals are acceptable.
- c. Establish requirements to ensure that staff receives appropriate training on policies integral to performance of their responsibilities relating to digital signatures.

Management Response

We concur. Systemwide Risk Management and the Office of General Counsel have developed and codified through Executive Order (EO) 1051 the approved "waiver of liability." This executive order was disseminated to campus presidents on July 23, 2010.

Systemwide Risk Management, working with the Office of General of General Counsel, will develop policy related to the use of electronic signatures on the waiver of liability and like kind of documents. Said policy will also establish requirements to ensure that staff receives appropriate training on policies integral to the performance of their responsibilities relating to digital signatures. This will be completed by February 1, 2011.

STUDY ABROAD

PARTICIPANT DOCUMENTATION

Documentation for student participation in study abroad programs was not always complete or consistently obtained.

Three of the campuses visited had not obtained liability releases or student health insurance information for all programs reviewed. At two campuses, documentation for certain programs could not be located and were not available for review.

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.

GC §13402 and §13403 require a system or systems of internal accounting and administrative controls so that reasonable assurances can be given that measures to safeguard assets, check the accuracy and reliability of accounting data, promote operational efficiency, and encourage adherence to prescribed managerial policies are being followed.

Campus management cited various reasons for not maintaining student documentation for study abroad courses/programs, including misunderstanding of the documentation requirements on recently implemented programs and the division of responsibility between campus offices for collecting the information.

Failure to obtain appropriate student participant documentation unnecessarily exposes the university to financial loss and/or embarrassment and increases the risk of misunderstandings with student participants.

Recommendation 3

We recommend that the chancellor's office remind the campuses of the need to obtain necessary documentation for student participation in study abroad programs including, but not limited to, the liability releases and student health information.

Management Response

We concur. AA International staff will prepare an AA coded memorandum including the policies, updates, and reminders resulting from the audit. The issue will be raised at the provosts meeting and at a meeting of the senior international officers. This will be completed by November 1, 2010.

AGREEMENTS

The execution and maintenance of study abroad/exchange program agreements needed improvement at all nine campus visited.

Our review of study abroad/exchange program agreements disclosed the following:

- ▶ Three campuses did not always obtain and/or refresh study abroad/exchange agreements at periodic intervals. There were inconsistencies among the campuses in the length of time for demonstrating and documenting reciprocity, specifically, whether it had to be annually or whether averaging over a multiple year period (e.g., three to five years) was acceptable.
- ▶ At six campuses, agreements did not include the appropriate hold harmless clause and/or indemnification language between the university partner and the campus, and three campuses maintained agreements that renewed indefinitely.
- ▶ Six campuses did not document delegations of authority to sign agreements.

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, states, in part, that campus presidents or their designees may initiate agreements with foreign institutions of higher education, governmental agencies, or non-profit corporations or associations in order to enhance international goodwill and understanding through the exchange of students.

EO 775, *Acquisition of Personal Property and Services*, dated June 6, 2001, states that authority is hereby delegated to each campus president or designee to acquire personal property and services including information technology resources, goods, and services where applicable provisions of *The California State University Policy Manual for Contracting and Procurement*, issued and maintained by the Office of the Chancellor, have been followed.

EO 849, *California State University Insurance Requirements*, dated February 5, 2003, states that a placement agreement, typically used when students are placed at an agency or institution for the purpose of course-required work experience, shall contain minimum insurance requirements applicable to the contracting parties and shall contain hold harmless provisions representative of the needs of the contracting party.

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 California State University Policy Manual for Contracting and Procurement §240.1 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.

Campus management stated that program agreements were not always properly executed and maintained due to imprecise guidance on the length of time that could be covered by an agreement, resource constraints, and a lack of awareness of necessary contracting language.

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

Recommendation 4

We recommend that the chancellor's office:

- a. Establish policy on the maximum period of time that study abroad/exchange agreements should be extended without formal review and renewal.
- b. Remind the campuses of the need to maintain current, complete, and properly authorized agreements for all study abroad/exchange programs.
- c. Ensure that appropriate delegations of authority are in place for those who sign study abroad and exchange agreements.

Management Response

We concur. AA International staff will prepare an AA coded memorandum including the policies, updates, and reminders resulting from the audit. AA will work with the Office of General Counsel to establish a standard duration for study abroad and exchange agreements. The issue will be raised at the provosts meeting and at a meeting of the senior international officers.

AA will further remind campuses that the authority to enter into agreements is delegated to the campus president and of the need to have a process for review and delegation of authority properly filed for those who sign agreements related to international activity. This will be completed by November 1, 2010.

EXCHANGE RECIPROACITY

Reciprocity in student exchange programs needed improvement at five of the nine campuses visited.

Four campuses had not adequately documented the value received under exchange agreements; and at one campus in recent years, there has been a negative imbalance in the National Student Exchange (NSE) program. Additionally, the definition of comparability was subject to interpretation and could involve a mix of students and faculty exchanges as part of the same agreement.

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, authorizes campuses to participate in student exchange agreements provided that comparable expenses are met or waived by, or on behalf of, the foreign entity entering into the agreement.

GC §8314 states that it is unlawful for a state employee to use or permit others to use public resources for personal or other purposes which are not authorized by law.

GC §13402 and §13403 require a system or systems of internal accounting and administrative controls so that reasonable assurances can be given that measures to safeguard assets, check the

accuracy and reliability of accounting data, promote operational efficiency, and encourage adherence to prescribed managerial policies are being followed.

Campus management stated that they were either unaware of the requirement to perform reviews of exchange programs for reciprocity or their existing reviews did not check for this requirement. Regarding the NSE program, the campus with the negative imbalance indicated that the number of students was low because the campus had not been effectively promoting participation.

Failure to adequately document and demonstrate the value received under exchange agreements exposes the campuses and CSU to criticisms of fiscal improprieties.

Recommendation 5

We recommend that the chancellor's office:

- a. Clarify the types of comparable expenses acceptable in student exchange programs.
- b. Remind the campuses of the need to adequately document and demonstrate reciprocity in student exchange agreements.

Management Response

We concur. AA International staff will prepare an AA coded memorandum including the policies, updates, and reminders resulting from the audit. The issue will be raised at the provosts meeting and at a meeting of the senior international officers. This will be completed by November 1, 2010.

INDEPENDENT TRAVEL

The CSU has not adequately addressed requirements when students travel independently to/from study abroad and international exchange program locations.

Independent travel to/from study abroad and international exchange program locations is a common occurrence. Under this type of arrangement, the majority of campuses and the chancellor's office international programs office routinely obtain transportation specifics for these students such as the name of the air carrier, the flight number, the date and time of departure, and the date, time, and location of arrival. However, one campus we visited took the position that systemwide policy was unclear and that, in the absence of specific direction, proceeding to collect similar information would have implied some liability for the travel. Despite this argument, the campus did comply with other components of systemwide travel policy such as making the required written notifications to traveling students and obtaining the necessary student acknowledgments.

EO 1041, *California State University Student Travel Policy*, dated July 1, 2009, states that student travel required in CSU-affiliated programs shall be conducted in compliance with Trustee Policy on Student Travel, Board of Trustees' Resolution REP 1-92-02. The resolution defines applicability of

the policy to student travel sponsored by, or pursuant to, a program of the CSU or any campus of the CSU. A number of additional requirements then apply including:

- ▶ Conducting the travel in ways that offer the least risk to the safety of participants and to the liability of the CSU.
- ▶ Review and approval on the use of scheduled or chartered transportation services by the president or designees for campus-based programs by the chancellor or designees in the case of student travel conducted on a systemwide basis.
- ▶ Minimum travel insurance.
- ▶ Written notification to the students that program participation is voluntary and that travel involves risks to personal safety that could result in damage to property, injury, or death.
- ▶ A signed written acknowledgement from students participating in the affiliated programs stating that they have been informed of the risks, certifying that they undertake such travel voluntarily, and that they release and hold harmless CSU institutions and persons.

EO 715, *California State University Risk Management Policy*, dated October 27, 1999, states that the systemwide office of risk management shall provide guidance on the application of risk management techniques and procedures appropriate to the CSU.

EO 1013, *California State University Emergency Management Program*, dated August 7, 2007, requires that each campus develop a campus emergency plan.

GC §13402 and §13403 require a system or systems of internal accounting and administrative controls so that reasonable assurances can be given that measures to safeguard assets, check the accuracy and reliability of accounting data, promote operational efficiency, and encourage adherence to prescribed managerial policies are being followed.

The Forum on Education Abroad's *Standards of Good Practice for Short-Term Education Abroad Programs* states that programs should be organized with close attention to risk management issues.

Ambiguity in the administration of study abroad and exchange programs exposes the university to liability and/or embarrassment due to misunderstandings of risks and responsibilities and increases the risk of inadequate response to emergencies abroad before and after CSU-affiliated programs.

Recommendation 6

We recommend that the chancellor's office:

- a. Clarify and document systemwide policy on whether campuses should obtain emergency contact and arrival information on students traveling independently to/from CSU-related programs at international locations.

- b. Advise campuses of policies on students traveling independently.
- c. Establish requirements for campuses to monitor policy compliance for students traveling independently.

Management Response

We concur. Systemwide Risk Management will distribute a technical letter recommending that campuses collect applicable contact and travel itinerary information from students who travel independently to/from CSU-related programs at international locations. The technical letter will include recommended policies and good practices for a campus to implement related to student's independent travel, including, but not limited to, the establishment of requirements for campuses to follow in monitoring policy compliance and adherence to good foreign travel practices. This will be completed by February 1, 2011.

FIELD TRIPS

DOCUMENTATION AND RECORD RETENTION

Systemwide policies for field trips were outdated and record retention requirements for field trip documents were unclear.

The primary source for systemwide guidance on field trips is EO 715, *California State University Risk Management Policy*, dated October 27, 1999. This policy is over ten years old, and it does not address record retention of required field trip documentation.

Our review of nine campuses disclosed several instances in which field trip documentation was not available for review:

- ▶ For seven campuses, signed liability waivers were not available for all field trip participants.
- ▶ For seven campuses, evidence that student emergency contact information had been obtained prior to the field trip taking place was not documented for all field trips reviewed.
- ▶ For six campuses, documentation that participants had received a detailed instructional agenda that included such topics as health/safety information, emergency procedures, and student code of conduct was not available for all field trips reviewed.
- ▶ For three campuses, evidence that instructors had visited the field trip site or demonstrated sufficient knowledge of the area prior to the field trip taking place was not available for all field trips reviewed.

In addition, four of the campuses reviewed specifically stated that field trip documentation had been collected but was not available for review because there were no requirements to maintain the documentation after the field trip had taken place.

EO 1031, *Systemwide Records/Information Retention and Disposition Schedules Implementation*, dated February 27, 2008, discusses record retention requirements but the schedules referenced therein also do not specifically identify and establish retention periods for field trip documents completed by student participants.

GC §911.2 provides general provisions for the length of time during which an individual or entity can file a claim against the state and its respective agencies for a particular activity and thereby creates a basis for the amount of time defensive documentation must be retained after a campus-sponsored activity is completed.

GC §13402 and §13403 state that management is responsible for establishing and maintaining a system of internal administrative controls, which includes documenting the system, communicating system requirements to employees, and assuring that the system is functioning as prescribed and is modified, as appropriate, for changes in conditions. Further, administrative controls are the methods through which reasonable assurance can be given that measures adopted by state agency heads to safeguard assets and promote operational efficiency are being followed.

At several campuses, responsibility for retention of field trip documentation had been delegated to the individual faculty members who were unaware of retention requirements and frequently discarded documentation on a premature basis when the trip concluded or after the end of the academic term.

The absence of current and complete field trip policies and procedures increases the risk of misunderstandings related to the responsibilities of the campus in obtaining and maintaining appropriate field trip documentation, unnecessarily exposes participating students to undue risk, and increases the potential for loss to the campus and the CSU.

Recommendation 7

We recommend that the chancellor's office:

- a. Review and update existing field trip systemwide policies and records retention schedules to specifically identify field trip documentation and address required retention periods.
- b. Establish a specific means for future review and maintenance of systemwide field trip policies to ensure that they are updated and communicated at appropriate intervals.
- c. Remind the campuses of the need to retain field trip documentation for appropriate periods.

Management Response

We concur. AA, working with Risk Management, will identify required documentation and retention periods. The responsibility for policy implementation is delegated to the campus president. This will be completed by August 1, 2011.

ADMINISTRATION

Administration of field trips at most campuses was highly decentralized without a system for adequate training or monitoring of compliance.

We noted that:

- ▶ Administration of field trips varied by campus, but generally there was no centralized record to identify classes with off-campus field trips. Individual instructors or departments were responsible for identifying classes that conducted field trips and for maintaining field trip documentation. Due to this decentralization, it was difficult to obtain a complete listing of field trips that had taken place.
- ▶ Although risk management or other similar offices within the campuses were often involved in the creation of field trip policies, these policies did not provide for adequate departmental training or monitoring of departmental compliance, nor were these offices involved in the training or monitoring function. Seven of nine campuses reviewed were specifically cited in this area.

EO 715, *California State University Risk Management Policy*, dated October 27, 1999, includes multiple guidelines to control risk in off-campus activities. It further states that campus policy to implement these guidelines should include a provision for documenting compliance, and that campus policy and procedures should be reviewed annually.

GC §13402 and §13403 require a system or systems of internal accounting and administrative controls so that reasonable assurances can be given that measures to safeguard assets, check the accuracy and reliability of accounting data, promote operational efficiency, and encourage adherence to prescribed managerial policies are being followed.

Campus management cited various reasons for not monitoring field trips including the decentralized operation of academic departments and the frequency of field trips.

The failure to track and identify classes that involve off-campus field trips and to ensure that these classes are in compliance with field trip policies and procedures unnecessarily exposes participating students to undue risk and increases the potential for loss to the campus and the CSU.

Recommendation 8

We recommend that the chancellor's office:

- a. Establish a policy requiring campuses to identify all classes involving off-campus field trips.
- b. Reinforce the requirement of campuses to monitor and document compliance with field trip policies and procedures.

Management Response

We concur. AA will develop a policy for campuses to identify all classes with a field trip and to monitor compliance with field trip policies. The responsibility for implementation is delegated to the campus president. This will be completed by August 1, 2011.

COMMUNITY ENGAGEMENT

STATISTICS

Processes for accumulating and validating service learning statistical estimates were inefficient and potentially error-prone because of estimates that could not be verified.

A patchwork of different systems were utilized on the campuses to estimate data on the extent of service learning such as the number of course sections, the number of students involved, and the number of hours contributed to the community. Four campuses were specifically cited for a need to improve systems for gathering and documenting information about service learning. Systemwide, various resources have been utilized for collecting and reporting service learning statistics including:

- ▶ The Academic Planning Database reports the number of service learning course sections; but it can be inaccurate depending on whether the data can be successfully corroborated with academic departments and the extent to which other variables are not accounted for, such as course sections with different service learning hours or courses where the service learning component is optional.
- ▶ Annual Reports for the California Call to Service.
- ▶ Various discontinued surveys conducted at different intervals which included service learning components such as the Student Needs and Priorities Survey (SNAPS), the Student Expenses and Resources Survey (SEARS), and the CSU Technology Metrics Questionnaire administered by the Social and Behavioral Research Institute at California State University, San Marcos.
- ▶ Federal work-study funds designated for community service placements.

The systems at the campuses and systemwide level have produced estimates or projections of service learning activity, but not accurate numbers with adequate verifiable supporting documentation.

Service learning activity is subject to campus and systemwide reporting for various purposes including recognition through The Carnegie Foundation of the Advancement of Teaching that annually selects colleges and universities for community engagement classification awards.

GC §13402 and §13403 require a system or systems of internal accounting and administrative controls so that reasonable assurances can be given that measures to safeguard assets, check the accuracy and reliability of accounting data, promote operational efficiency, and encourage adherence to prescribed managerial policies are being followed.

Some campuses stated that the capability to capture and report statistics changed with the transition to the Common Management Systems and that system coding by academic departments was unreliable.

Inefficient systems and unreliable statistics on service learning activity create misleading information on program accomplishments and jeopardize CSU credibility.

Recommendation 9

We recommend that the chancellor's office work with the campuses to improve the way in which service learning statistics are generated and documented.

Management Response

We concur. Community Engagement will work with campuses to improve data collection in three areas: possible implementation of Monterey Bay's PeopleSoft module, My Service Learning Placement (MYSLP) with a majority of campuses; strengthen the Academic Planning Database data collection process on individual campuses; and secure an annual or biannual systemwide survey of students' community engagement efforts. This will be completed by August 1, 2011.

PARTNER AGREEMENTS AND SITE VISITS

Implementation of service learning best practices needed improvement.

Seven campuses had not visited enough community partner locations, and six campuses did not have an adequate number of partnership agreements for service learning. Documentation of community orientations, service learning placement records, and emergency contact information was weak at some campuses.

The 2002 CSU publication *Best Practices for Managing Risks in Service Learning* provides for:

- ▶ Community orientation.
- ▶ Student learning plans.

- ▶ Site visits.
- ▶ Community partner agreements.
- ▶ Inclusion of service learning requirements in course descriptions.
- ▶ Student service logs.
- ▶ Service learning placement records.
- ▶ Identification of emergency contacts.

EO 715, *California State University Risk Management Policy*, dated October 27, 1999, states that the campus is responsible for managing and controlling risks.

Recognition of site visits and partner agreements were not universally endorsed as a requirement on all campuses, and other campuses cited resource limitations restricting more thorough implementation of best practices. Some campuses cited the volume of partner locations as an impediment to doing more site visits and agreements given existing resource limitations.

Failure to do site visits and obtain appropriate agreements with internship partners affects student safety and exposes the university to liability due to misunderstandings of risks and responsibilities.

Recommendation 10

We recommend that the chancellor's office revisit *Best Practices for Managing Risks in Service Learning* and establish, document, and communicate realistic policy and minimum standards for required service learning activities, particularly site visits and community partnership agreements.

Management Response

We concur. Systemwide Risk Management and AA/Community Engagement will review its *Best Practices* manual and update or amend as applicable. The updated manual will be distributed systemwide, and it will establish, document, and communicate realistic policy and minimum standards for required service learning activities. This will be completed by August 1, 2011.

INTERNSHIPS

The campuses did not consistently maintain documentation for internships.

In our review of internships, we noted that multiple campuses did not document:

- ▶ Familiarity with the internships location.
- ▶ Adequate orientation of hosting companies and students.
- ▶ Placement agreements addressing insurance and hold harmless provisions.
- ▶ Emergency planning arrangements.

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 715 contains appendices for various types of risk exposures but there is not one specifically labeled for internships. Internships also lack the same type of systemwide guidance provided to service learning through the 2002 CSU publication *Best Practices for Managing Risks in Service Learning*.

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 U.S. Department of Labor has also recently issued new rules for educational internships that apply a six-part test from the Fair Labor Standards Act particularly applicable to unpaid internships at for-profit companies.

Some campuses or individual departments stated that since they did not actually place students in internships, EO 849 requirements did not apply because it was part of the student's learning experience to locate and make the internship arrangement on their own. Some campuses or individual departments also indicated they might need to treat internships differently based on variables such as whether the internship was paid or unpaid, optional or required, or when students do not opt to apply for academic credit.

Failure to address adequate terms in internship contracts and obtain appropriate student documentation affects student safety and exposes the university to liability and/or embarrassment due to misunderstandings of risk and responsibilities.

Recommendation 11

We recommend that the chancellor's office:

- a. Establish and issue appropriate policies for the different types of internships.

- b. Remind the campuses of the need to obtain internship documentation and monitor compliance with systemwide internship policies and procedures.

Management Response

We concur. In discussions with Risk Management, AA will establish policies for internships (other than in the areas of teacher preparation and clinical placements, which owing to their specialized nature are governed separately). The responsibility for implementing those policies is delegated to the campus president. This will be completed by August 1, 2011.

APPENDIX A: PERSONNEL CONTACTED

<u>Name</u>	<u>Title</u>
<u>Office of the Chancellor</u>	
Judy Botelho	Interim Director, Center for Community Engagement
Gail Brooks	Vice Chancellor, Human Resources
Jeri Echeverria	Executive Vice Chancellor and Chief Academic Officer (At time of review)
Phil Garcia	Senior Director, Analytic Studies
Bruce Gibson	Senior Director, Systemwide Benefits
Zachary Gifford	Assistant Systemwide Risk Manager
Dean Kulju	Director, Student Academic Support
Charlene Minnick	Assistant Vice Chancellor, Risk Management and Public Safety
Benjamin F. Quillian	Executive Vice Chancellor and Chief Financial Officer
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David Beadle	Director, Safety and Risk Management
Mustafah Dhada	Assistant Vice President, Academic Programs
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Michael Neal	Vice President, Business and Administrative Services
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Mandy Rees	Chair, Theatre Department
Amanda Thrasher	Multiple and Single Subject Evaluator, Department of Teacher Education
Douglas Wade	Associate Vice President, Fiscal Affairs

APPENDIX A: PERSONNEL CONTACTED

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John Beisner	Director, Risk Management
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John Carroll	Chair, Department of Geography
Pat Carroll	Executive Assistant
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APPENDIX A: PERSONNEL CONTACTED

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Jerry Luedders	Assistant Provost
Howard Lutwak	Director of Internal Audit
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APPENDIX A: PERSONNEL CONTACTED

California State University, Northridge (cont.)

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Joice Xiong	Director, Internal Audits

APPENDIX A: PERSONNEL CONTACTED

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San Diego State University

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San José State University

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John Boothby	Chair, Department of Biological Sciences
Bill Briggs	Chair, Department of Journalism and Mass Communications
Bill DeVincenzi	Lecturer, Accounting and Finance
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Sharon Glazer	Associate Professor, Psychology
Jennifer Gregg	Assistant Professor, Psychology
Megumi Hosoda	Professor, Psychology
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Kenneth Louden	Professor and Chair, Department of Computer Science
Blanca Millan	International Undergraduate Evaluator
Mark Novak	Associate Vice President/Dean, International and Extended Studies
Dora Ozawa	Information Technology Consultant, Registrar Services

San José State University (cont.)

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Ninh Pham-Hi	Director, Internal Control
Dorothy Poole	Assistant Vice President, Administration and Finance
Annabel Prins	Associate Professor, Psychology
Shirley Reekie	Chair, Department of Kinesiology
Dave Rudel	Assistant Director, International Programs and Services
Richard Sedlock	Chair, Department of Geology
Namrata Shukla	Financial Operations Manager, International and Extended Studies
Marian Sofish	Registrar
Leslie Speer	Assistant Professor, Art and Design
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Chris Tseng	Professor, Computer Science
George Vasquez	Associate Dean, College of Social Sciences
Iris Wang	Off Campus Program Specialist, College of Engineering
Belle Wei	Dean, College of Engineering
Charles Whitcomb	Vice Provost, Academic Administration and Personnel



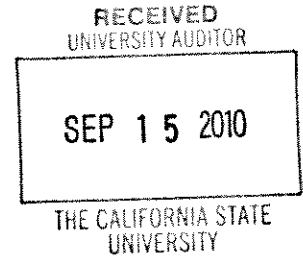
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Ephraim P. Smith
Executive Vice Chancellor
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Email esmith@calstate.edu

September 14, 2010

MEMORANDUM



TO: Mr. Larry Mandel
University Auditor

FROM: Ephraim P. Smith
Executive Vice Chancellor and Chief Academic Officer

SUBJECT: Management Response to Recommendations of Off-Campus Activities
Systemwide Audit (09-54)

The findings and recommendations included in the Off-Campus Activities Audit Report number 09-54 have been reviewed by Academic Affairs and Business and Finance. Our response to each of the recommendations appears on the attachment.

We appreciate the opportunity to review and comment on the recommendations that address off-campus activities policies and procedures. Please feel free to contact me if you have any questions about our response to the audit recommendations.

EPS/jkt

c: Dr. Benjamin F. Quillian
Dr. Lorie Roth
Mr. Leo Van Cleve

Attachment

CSU Campuses
Bakersfield
Channel Islands
Chico
Dominguez Hills
East Bay

Fresno
Fullerton
Humboldt
Long Beach
Los Angeles
Maritime Academy

Monterey Bay
Northridge
Pomona
Sacramento
San Bernardino
San Diego

San Francisco
San José
San Luis Obispo
San Marcos
Sonoma
Stanislaus

OFF-CAMPUS ACTIVITIES

SYSTEMWIDE

Audit Report 09-54

GENERAL ENVIRONMENT

POLICY FRAMEWORK

Recommendation 1

We recommend that the chancellor's office consider revising the process for OCA policy formulation and dissemination to include consolidation of OCA policies, improvement in OCA policy distribution, training for all appropriate staff on OCA policies, and establishment of a specific means for future review and maintenance of OCA systemwide policies.

Management Response

We concur. Academic Affairs will designate staff to be responsible for policy development and review to be posted on an "Off-Campus Activities" website. This site will also aggregate policies related to the various activities under this rubric. Finally, Academic Affairs will develop a plan for distribution and training in these areas. To be completed by August 1, 2011.

RELEASE FORM/DIGITAL SIGNATURES

Recommendation 2

We recommend that the chancellor's office:

- a. Establish a systemwide policy requiring use of the *Release of Liability, Promise Not To Sue, Assumption of Risk and Agreement to Pay Claims* form for students participating in off-campus activities.
- b. Finalize a systemwide digital signature policy and specifically clarify whether electronic acknowledgments by students of the *Release of Liability, Promise Not To Sue, Assumption of Risk and Agreement to Pay Claims* forms through student portals are acceptable.
- c. Establish requirements to ensure that staff receives appropriate training on policies integral to performance of their responsibilities relating to digital signatures.

Management Response

We concur. Systemwide Risk Management and the Office of General Counsel have developed and codified through Executive Order 1051 the approved "waiver of liability". This executive order was disseminated to campus Presidents on July 23, 2010.

Systemwide Risk Management in working with the Office of General of General Counsel will develop policy related to the use of electronic signatures on the waiver-of-liability and like kind of documents. Said guidelines will also establish requirements to ensure that staff receives appropriate training on policies integral to performance of their responsibilities relating to digital signatures. This will be completed by February, 2011.

STUDY ABROAD

PARTICIPANT DOCUMENTATION

Recommendation 3

We recommend that the chancellor's office remind the campuses of the need to obtain necessary documentation for student participation in study abroad programs including, but not limited to, the liability releases and student health information.

Management Response

We concur. AA International Staff will prepare an AA Coded Memorandum including the policies, updates, and reminders resulting from the audit. The issue will be raised at the Provosts meeting and at a meeting of the Senior International Officers. To be completed by November 1, 2010.

AGREEMENTS

Recommendation 4

We recommend that the chancellor's office:

- a. Establish policy on the maximum period of time that study abroad/exchange agreements should be extended without formal review and renewal.
- b. Remind the campuses of the need to maintain current, complete, and properly authorized agreements for all study abroad/exchange programs.
- c. Ensure that appropriate delegations of authority are in place for those who sign study abroad and exchange agreements.

Management Response

We concur. AA International Staff will prepare an AA Coded Memorandum including the policies, updates, and reminders resulting from the audit. AA will work with General Counsel to establish a

standard duration for study abroad and exchange agreements. The issue will be raised at the Provosts meeting and at a meeting of the Senior International Officers.

AA will further remind campus that the authority to enter into agreements is delegated to the campus President and of the need to have a process for review and delegation of authority properly filed for those who sign agreements related to international activity. To be completed by November 1, 2010.

EXCHANGE RECIPROCITY

Recommendation 5

We recommend that the chancellor's office:

- a. Clarify the types of comparable expenses acceptable in student exchange programs.
- b. Remind the campuses of the need to adequately document and demonstrate reciprocity in student exchange agreements.

Management Response

We concur. AA International Staff will prepare an AA Coded Memorandum including the policies updates and reminders resulting from the audit. The issue will be raised at the Provosts meeting and at a meeting of the Senior International Officers. To be completed by November 1, 2010.

INDEPENDENT TRAVEL

Recommendation 6

We recommend that the chancellor's office:

- a. Clarify and document systemwide policy on whether campuses should obtain emergency contact and arrival information on students traveling independently to/from CSU-related programs at international locations.
- b. Advise campuses of policies on students traveling independently.
- c. Establish requirements for campuses to monitor policy compliance for students traveling independently.

Management Response

We concur. Systemwide risk management will distribute a technical letter recommending that campuses collect applicable contact and travel itinerary information from students who travel independently to/from CSU-related programs at international locations. The technical letter will include recommended policies and good practices for a campus to implement related to student's independent travel including but not limited to the establishment of requirements for campuses to follow in monitoring policy compliance and adherence to good foreign travel practices. To be completed by February, 2011.

FIELD TRIPS

DOCUMENTATION AND RECORD RETENTION

Recommendation 7

We recommend that the chancellor's office:

- a. Review and update existing field trip systemwide policies and records retention schedules to specifically identify field trip documentation and address required retention periods.
- b. Establish a specific means for future review and maintenance of systemwide field trip policies to ensure that they are updated and communicated at appropriate intervals.
- c. Remind the campuses of the need to retain field trip documentation for appropriate period.

Management Response

We concur. AA working with Risk Management will identify required documentation and retention periods. The responsibility for policy implementation is delegated to the campus President. To be completed by August 1, 2011.

ADMINISTRATION

Recommendation 8

We recommend that the chancellor's office:

- a. Establish a policy requiring campuses to identify all classes involving off-campus field trips.
- b. Reinforce the requirement of campuses to monitor and document compliance with field trip policies and procedures.

Management Response

We concur. AA will develop a policy for campuses to identify all classes with a field trip and to monitor compliance with field trip policies. The responsibility for implementation is delegated to the campus President. To be completed by August 1, 2011.

COMMUNITY ENGAGEMENT

STATISTICS

Recommendation 9

We recommend that the chancellor's office work with the campuses to improve the way in which service learning statistics are generated and documented.

Management Response

We concur. Community Engagement will work with campuses to improve data collection in three areas: possible implementation of Monterey Bay's PeopleSoft module, MYSLP (My Service Learning Placement) with majority of campuses, strengthen the APDB data collection process on individual campuses, and secure an annual or bi-annual systemwide survey of students' community engagement efforts. To be completed by August 1, 2011.

PARTNER AGREEMENTS AND SITE VISITS

Recommendation 10

We recommend that the chancellor's office revisit *Best Practices for Managing Risks in Service Learning* and establish, document, and communicate realistic policy and minimum standards for required service learning activities, particularly site visits and community partnership agreements.

Management Response

We concur. Systemwide Risk Management and AA/Community Engagement will review its "Best Practices" manual and update or amend as applicable. The updated manual will be distributed systemwide and it will establish, document, and communicate realistic policy and minimum standards for required service-learning activities. To be completed by August 1, 2011.

INTERNSHIPS

Recommendation 11

We recommend that the chancellor's office:

- a. Establish and issue appropriate policies for the different types of internships.
- b. Remind the campuses of the need to obtain internship documentation and monitor compliance with systemwide internship policies and procedures.

Management Response

We concur. In discussions with Risk Management AA will establish policies for internships (other than in the areas of teacher preparation and clinical placements which owing to their specialized nature are governed separately). The responsibility for implementing those policies is delegated to the campus President. To be completed by August 1, 2011.

THE CALIFORNIA STATE UNIVERSITY
OFFICE OF THE CHANCELLOR



BAKERSFIELD

CHANNEL ISLANDS

September 20, 2010

CHICO

MEMORANDUM

DOMINGUEZ HILLS

EAST BAY

TO: Mr. Larry Mandel
University Auditor

FRESNO

FULLERTON

FROM: Charles B. Reed
Chancellor

HUMBOLDT

SUBJECT: Draft Final Report 09-54 on *Off-Campus Activities, Systemwide*

LONG BEACH

LOS ANGELES

In response to your memorandum of September 20, 2010, I accept the response as submitted with the draft final report on *Off-Campus Activities, Systemwide*.

MARITIME ACADEMY

MONTEREY BAY

NORTHRIDGE

CBR/amd

POMONA

SACRAMENTO

SAN BERNARDINO

SAN DIEGO

SAN FRANCISCO

SAN JOSÉ

SAN LUIS OBISPO

SAN MARCOS

SONOMA

STANISLAUS