

OFF-CAMPUS ACTIVITIES
SAN JOSÉ STATE UNIVERSITY

Audit Report 09-63
March 31, 2010

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ABBREVIATIONS

CCLL	Center for Community Learning and Leadership
CSU	California State University
EO	Executive Order
FTIP	Foreign Travel Insurance Program
GC	Government Code
IES	International and Extended Studies
IPS	International Programs and Services
NSE	National Student Exchange
OCA	Off-Campus Activities
REP	Resolution of the Committee on Educational Policy
SJSU	San José State University
SL	Service Learning

EXECUTIVE SUMMARY

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

We visited the San José State University campus from September 29, 2009, through November 20, 2009, and audited the procedures in effect at that time.

Our study and evaluation did not reveal any significant internal control problems or weaknesses that would be considered pervasive in their effects on off-campus activities controls. However, we did identify other reportable weaknesses that are described in the executive summary and body of this report. In our opinion, 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 satisfactory. Numbers in brackets [] refer to page numbers in the report.

STUDY ABROAD [6]

Several aspects of the study abroad and exchange program administration needed improvement. In recent years, there has been a negative imbalance in the National Student Exchange program.

FIELD TRIPS [9]

The campus field trip policy was unclear and administration of field trips was highly decentralized without a system for monitoring department compliance.

COMMUNITY ENGAGEMENT [11]

Documentation for academic internships needed improvement. The campus could not assure compliance with service learning (SL) policies, procedures and best practices and the process for accumulating and validating SL statistics needed improvement.

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 San José State University, there are organizational entities involved in OCA similar to the chancellor’s office that report to different vice presidents. The provost and vice president for academic affairs has responsibility for International and Extended Studies and the Center for Community Learning and Leadership. The vice president for administration and finance oversees the University Risk and Compliance office.

PURPOSE

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

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

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

SCOPE AND METHODOLOGY

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

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

Specifically, we reviewed and tested:

- ▶ Identification of risks and implementation of risk mitigation measures for service learning, community service, academic internships, field trips, study abroad, and student exchange programs.
- ▶ Service learning best practices including site visits and learning agreements with community partners.
- ▶ Involvement with volunteer initiatives.
- ▶ Selection and approval of internships.
- ▶ Field trip notifications and procedures.
- ▶ Execution of study abroad contracts.
- ▶ Relationships with study abroad providers.
- ▶ Student exchange reciprocity.

OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

STUDY ABROAD

PROGRAM ADMINISTRATION

Several aspects of the study abroad and exchange program administration needed improvement.

Our review of the study abroad and exchange programs disclosed the following:

- ▶ The campus' web presentation of exchange relationships was confusing and the meaning of various documents was unclear. International and Extended Studies (IES) maintained a separate listing of various documents that was different from agreements on file with International Programs and Services (IPS).
- ▶ IPS did not closely coordinate at least one of the college-based programs for study abroad. This program also had an informed consent liability waiver form that did not include California State University (CSU) indemnification.
- ▶ The campus had renewed two older exchange program contracts but lacked sufficient file documentation on the renewal.
- ▶ Faculty leaders in college-based programs signed provider contracts without delegations of authority or involvement of contracting officers with the Tower Foundation (an auxiliary organization) or the campus. Some of these contracts that were commitments against funds held in the Tower Foundation identified the campus as the contracting party.
- ▶ The campus did not use the Foreign Travel Insurance Program (FTIP) for students traveling independently in study abroad and exchange programs. Students signed a campus-developed form, *Independent Travel and Hold-Harmless Statement*, and obtained insurance from a non-FTIP source.
- ▶ Three college-based programs were donor-funded and administered through the Tower Foundation.

Executive Order (EO) 745, *Self-Support Campus-Based Study Abroad Programs*, dated June 7, 2000, states that self-supporting campus-based study abroad programs are operated by the continuing or extended education divisions.

EO 1041, *California State University Student Travel Policy*, dated July 1, 2009, requires that student air travel shall be conducted in ways which offer the least risk to the safety of participants and to the liability of the CSU and that use of scheduled or chartered transportation services must be reviewed and approved by the president or designees for campus-based programs.

CSU Policy Manual for Contracting and Procurement §102 requires campus presidents to maintain documentation on delegations of purchasing authority and that responsibility for the preparation of campus internal policies and procedures, consistent with the provision of the manual, remains with the campus presidents. Should campus presidents choose to further delegate their purchasing authority, campuses must maintain documentation of such delegation.

CSU 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.

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.

The assistant director of IPS stated that there were limited resources for additional program coordination and improvements in study abroad and exchange programs.

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.

Recommendation 1

We recommend that the campus:

- a. Improve the web presentation of exchange arrangements.
- b. Regularly review all study abroad and exchange program documents for inclusion of proper terms and conditions and documentation of renewals.
- c. Clarify delegations of authority for execution of study abroad and exchange program contracts.
- d. Reconsider requiring FTIP coverage for students.
- e. Administer study abroad and exchange programs through accounts administered by IES.

Campus Response

We concur. We will complete management remedial action to:

- a. Improve the web presentation of exchange arrangements by the end of May 2010.
- b. Implement a routine, by the end of May 2010, to regularly review all study abroad and exchange program documents for inclusion of proper terms and conditions and documentation of renewals.
- c. Clarify delegations of authority for execution of study abroad and exchange program contracts by the end of May 2010.
- d. Reconsider requiring FTIP coverage for students. We will consult with the chancellor's office to seek confirmation that our current coverage is approved and adequate, or needs to be switched to FTIP by the end of June 2010.
- e. Bring all study abroad and exchange programs into IES administered accounts by the end of June 2010.

EXCHANGE RECIPROCITY

In recent years, there has been a negative imbalance in the National Student Exchange (NSE) program.

The NSE is a domestic counterpart with approximately 250 member institutions to exchange programs conducted on an international basis. Incoming NSE students pay fees to either the host or receiving institution (plan A) or the home institution (plan B). Under the plan B option, any incoming NSE students would not pay any fees to San José State University (SJSU).

In the four-year period of 2005/06 through 2008/09, SJSU has hosted more NSE students under plan B than the number of SJSU students outgoing under NSE as follows:

YEAR	PLAN B INCOMING	SJSU OUTGOING
2008/09	26	1
2007/08	13	1
2006/07	17	4
2005/06	10	3

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. No specific EO exists for domestic exchanges but it would be a reasonable expectation that the basic

economic considerations for applicable international exchanges also apply to domestic exchange programs.

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.

The assistant director of student outreach and recruitment stated that the number of outgoing NSE students was low because the campus had not been effectively promoting participation.

Inadequate reciprocity under exchange agreements exposes the campus and CSU to criticisms of fiscal improprieties.

Recommendation 2

We recommend that the campus re-evaluate NSE participation and if the program is continued, establish a schedule for periodic reporting and future reviews.

Campus Response

We concur. We will re-evaluate NSE participation and if the program is continued, establish a schedule for periodic reporting and future reviews by the end of May 2010.

FIELD TRIPS

The campus field trip policy was unclear and administration of field trips was highly decentralized without a system for monitoring department compliance.

During our review of the campus-wide field trip policy and field trip procedures in four academic departments and the university risk and compliance office, we found that:

- ▶ The campus policy for field trips was ambiguous. It invited faculty to determine what constituted an “unusually high risk” without including defined criteria or parameters that would allow for consistent reporting. Specifically, Section II.3 in the SJSU *Field Trip Policy*, revised December 16, 2008, states that “if a field trip poses an unusually high risk, consult with Risk Management to determine if a Hold Harmless Agreement form must be filled out, signed by all participants, and filed in the Department office before departing on the field trip.”

- ▶ The current form used for field trips, Student Travel Informed Consent, contains a more robust distribution than required by the policy. This form states that one copy should be submitted to the SJSU academic department, one copy to the SJSU university police dispatch, and one copy to risk and compliance services (the former name for the university risk and compliance office).
- ▶ The campus did not have an accurate and reliable procedure for monitoring compliance with the field trip policy.
- ▶ The university risk and compliance office had received Student Travel Informed Consent forms for approximately 22 2008/09 field trips, far fewer than likely occurred.
- ▶ Three of four academic departments had multiple field trips that they did not report to the university risk and compliance office.

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

- ▶ Plan and include in the itinerary all destinations and alternatives if an emergency prevents entry to the original destination. Send a copy of the itinerary to campus public safety.
- ▶ Review emergency preparedness processes and the crisis response plan. Distribute a handout for students with emergency phone numbers and contacts.

SJSU *Field Trip Policy*, dated March 2007 (revised December 16, 2008), states that if a field trip poses an unusually high risk, consult with risk management to determine if a hold harmless agreement form must be filled out, signed by all participants, and filed in the department office before departing on a field trip.

SJSU Presidential Directive 2005-01, *Risk Management*, dated September 22, 2005, states that it recommends faculty members consult with risk management prior to engaging in off-campus trips.

The bottom of the campus Student Travel Informed Consent form states that one copy of the completed form should be submitted to the academic department office, one copy to the university police dispatch, and one copy to risk and compliance services prior to departure.

The associate director of risk and compliance stated that they have to rely on faculty members to consult with them due to the high volume of field trips, and it was likely that, in most cases, the faculty had determined it was not necessary because the degree of risk was not high.

The lack of adequate compliance with policies and procedures to control the risks associated with off-campus field trips unnecessarily exposes participating students to undue risk and increases the potential for loss to the campus and the CSU.

Recommendation 3

We recommend that the campus:

- a. Establish and document a more precise and prescriptive field trip policy.
- b. Require preparation and distribution of the Student Travel Informed Consent form on all field trips.
- c. Implement a reliable process to monitor and enforce compliance with established field trip requirements.

Campus Response

We concur. We will complete management remedial action to:

- a. Establish and document a more precise and prescriptive field trip policy by the end of July 2010.
- b. Require preparation and distribution of the Student Travel Informed Consent form on all field trips by the end of June 2010.
- c. Implement a reliable process to monitor and enforce compliance with established field trip requirements by the end of June 2010.

COMMUNITY ENGAGEMENT

ACADEMIC INTERNSHIPS

Documentation for academic internships needed improvement.

Our review of academic internship practices in five academic departments disclosed that:

- ▶ The campus used different contract forms with companies hosting academic internships, some of which did not address indemnification.
- ▶ Most student documentation on internships lacked emergency contact information and hold harmless statements.

EO 715, *California State University Risk Management Policy*, dated October 27, 1999, states that the campus is responsible to manage and control risks. Using third-party waivers or hold harmless agreements is one way to minimize liability and exposure related to internship activities.

EO 849, *California State University Insurance Requirements*, dated February 5, 2003, documents insurance requirements for agreements and contracts. In addition, it states that placement agreements

for course-required work experience must be in writing and shall specify appropriate hold harmless provisions based on the needs of the contracting parties.

The individual departments contacted stated that they did not actually place students in internships so EO 849 requirements did not apply. They further stated that information provided by all students in MySJSU (a custom web portal application) was adequate for emergency contacts.

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 4

We recommend that the campus:

- a. Develop and implement procedures to ensure appropriate and complete contract terms for academic internships.
- b. Include emergency contact information and hold harmless statements on student documentation for academic internships.

Campus Response

We concur. We will complete management remedial action to:

- a. Develop and implement procedures to ensure appropriate and complete contract terms for academic internships by the end of July 2010.
- b. Include emergency contact information and hold harmless statements on student documentation for academic internships by the end of June 2010.

SERVICE LEARNING

The campus could not ensure compliance with service learning (SL) policies, procedures, and best practices.

Our review of SL disclosed that:

- ▶ A majority of SL activity is decentralized to academic departments. There is no central monitoring of SL compliance in the academic departments.
- ▶ The Center for Community Learning and Leadership (CCLL) maintained SL agreements with approximately 49 community partners and nothing with other companies hosting students.

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 SL 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 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 associate director of CCLL stated that reliance on academic departments without monitoring was necessary because of resource limitations.

Failure to monitor compliance with SL best practices exposes the university to liability and/or embarrassment due to misunderstandings of risk and responsibilities.

Recommendation 5

We recommend that the campus monitor academic department compliance with SL policies, procedures, and best practices.

Campus Response

We concur. We will design and implement a procedure under the oversight of the Department of Undergraduate Studies to monitor academic department compliance with SL policies, procedures, and best practices by the end of July 2010.

STATISTICS

The process for accumulating and validating SL statistics needed improvement.

In the 2008/09 Call to Service Report, CCLL reported SL program metrics as follows:

Number of SL courses offered	191
Number of new courses developed	7
Total student enrollment in SL courses	5,018
Estimated total SL hours in the community	100,360
Estimated community partner sites	40

These statistics were all estimates and validation was not possible. CCLL has attempted some alternatives to get better data. However, at present, these numbers cannot be reconciled to the Academic Planning Database, nor can they be independently re-created.

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 associate director of CCLL stated that the campus needed to estimate SL statistics because academic departments do not code SL correctly and accumulation by other means is inaccurate and unreliable.

Unreliable statistics on SL activity creates misleading information on program accomplishments and jeopardizes campus credibility.

Recommendation 6

We recommend that the campus improve the process for accumulating and validating SL statistics.

Campus Response

We concur. We will strengthen the methodology to improve the process for accumulating and validating SL statistics by the end of June 2010.

APPENDIX A: PERSONNEL CONTACTED

<u>Name</u>	<u>Title</u>
Jon Whitmore	President
Marcella Anthony	Assistant Director, Student Outreach and Recruitment
Sheila Bienenfeld	Chair, Department of Psychology
John Boothby	Chair, Department of Biological Sciences
Bill Briggs	Chair, Department of Journalism and Mass Communications
Bill DeVincenzi	Lecturer, Accounting and Finance
Gloria Edwards	Curriculum Analyst, Undergraduate Studies
Michael Fallon	Associate Director, Center for Community Learning and Leadership
Xuan Duong Francis	Student Program Coordinator, College of Engineering
Sharon Glazer	Associate Professor, Psychology
Jennifer Gregg	Assistant Professor, Psychology
Megumi Hosoda	Professor, Psychology
Dennis Jaehne	Associate Vice President, Undergraduate Studies
Christian Jochim	Chair, Department of Humanities
Barbara Keltner	Contract Analyst Lead, Procurement and Support Services
Elena Klaw	Associate Professor, Psychology and Director, Center for Community Learning and Leadership
Josee Larochelle	Associate Vice President, Finance
Rose Lee	Vice President, Administration and Finance
Minjie Li	Accounts Payable Technician, International and Extended Studies (IES)
Mark Loftus	Associate Director of Risk and Compliance
John Loomis	Director, School of Art and Design
Kenneth Louden	Professor and Chair, Department of Computer Science
Blanca Millan	International Undergraduate Evaluator
Mark Novak	Associate Vice President/Dean, IES
Dora Ozawa	Information Technology Consultant, Registrar Services
Jon Pearce	Professor, Computer Science
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, IES
Marian Sofish	Registrar
Leslie Speer	Assistant Professor, Art and Design
Pam Stacks	Associate Vice President, Graduate Studies and Research
Helen Stevens	Director, International Programs and Services
Suzanne Sundholm	Risk Analyst
Lynne Trulio	Chair, Department of Environmental Studies
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



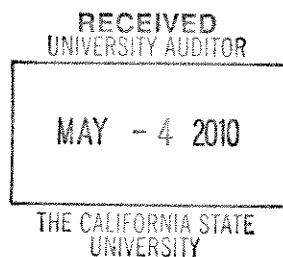
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May 4, 2010

Mr. Larry Mandel
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The California State University
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**Campus Response to "Off Campus Activities" Audit (09-63) at
San José State University**

Enclosed is San José State University's response to the "Off Campus Activities Audit". The campus is committed to addressing the issues identified in this audit report.

Please let me know if I can provide you with additional information.

A handwritten signature in cursive script that reads 'Rose L. Lee'.

ROSE L. LEE
Vice President for Administration and Finance

Enclosure

cc: Jon Whitmore, President
Ninh Pham-Hi, Director, Internal Control

The California State University:

Chancellor's Office, 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 Louis Obispo, San Marcos, Sonoma, Stanislaus

**OFF-CAMPUS ACTIVITIES
SAN JOSÉ STATE UNIVERSITY**

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STUDY ABROAD

PROGRAM ADMINISTRATION

Recommendation 1

We recommend that the campus:

- a. Improve the web presentation of exchange arrangements.
- b. Regularly review all study abroad and exchange program documents for inclusion of proper terms and conditions and documentation of renewals.
- c. Clarify delegations of authority for execution of study abroad and exchange program contracts.
- d. Reconsider requiring FTIP coverage for students.
- e. Administer study abroad and exchange programs through accounts administered by IES.

Campus Response

We concur. We will complete management remedial action to:

- a. Improve the web presentation of exchange arrangements, by end of May 2010.
- b. Implement a routine, by end of May 2010, to regularly review all study abroad and exchange program documents for inclusion of proper terms and conditions and documentation of renewals.
- c. Clarify delegations of authority for execution of study abroad and exchange program contracts, by end of May 2010.
- d. Reconsider requiring FTIP coverage for students. We will consult with the CO to seek confirmation that our current coverage is approved and adequate, or needs to be switched to FTIP, by end of June 2010.
- e. Bring all Study abroad and Exchange programs into IES administered accounts, by end of June 2010.

EXCHANGE RECIPROCITY

Recommendation 2

We recommend that the campus re-evaluate NSE participation and if the program is continued, establish a schedule for periodic reporting and future reviews.

Campus Response

We concur. We will re-evaluate NSE participation and if the program is continued, establish a schedule for periodic reporting and future reviews, by end of May 2010.

FIELD TRIPS

Recommendation 3

We recommend that the campus:

- a. Establish and document a more precise and prescriptive field trip policy.
- b. Require preparation and distribution of the *Student Travel Informed Consent* form on all field trips.
- c. Implement a reliable process to monitor and enforce compliance with established field trip requirements.

Campus Response

We concur. We will complete management remedial action to:

- a. Establish and document a more precise and prescriptive field trip policy, by end of July 2010.
- b. Require preparation and distribution of the Student Travel Informed Consent form on all field trips, by end of June 2010.
- c. Implement a reliable process to monitor and enforce compliance with established field trip requirements, by end of June 2010.

COMMUNITY ENGAGEMENT

ACADEMIC INTERNSHIPS

Recommendation 4

We recommend that the campus:

- a. Develop and implement procedures to ensure appropriate and complete contract terms for academic internships.
- b. Include emergency contact information and hold harmless statements on student documentation for academic internships.

Campus Response

We concur. We will complete management remedial action to:

- a. Develop and implement procedures to ensure appropriate and complete contract terms for academic internships, by end of July 2010.
- b. Include emergency contact information and hold harmless statements on student documentation for academic internships, by end of June 2010.

SERVICE LEARNING

Recommendation 5

We recommend that the campus monitor academic department compliance with SL policies, procedures, and best practices.

Campus Response

We concur. We will design and implement a procedure under the oversight of the Department of Undergraduate Studies to monitor academic department compliance with SL policies, procedures, and best practices, by end of July 2010.

STATISTICS

Recommendation 6

We recommend that the campus improve the process for accumulating and validating SL statistics.

Campus Response

We concur. We will strengthen the methodology to improve the process for accumulating and validating SL statistics, by end of June 2010.

THE CALIFORNIA STATE UNIVERSITY
OFFICE OF THE CHANCELLOR



BAKERSFIELD

CHANNEL ISLANDS

June 17, 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 09-63 on *Off-Campus Activities*,
San José State University

LONG BEACH

LOS ANGELES

MARITIME ACADEMY

In response to your memorandum of June 17, 2010, I accept the response as submitted with the draft final report on *Off-Campus Activities*, San José State University.

MONTEREY BAY

NORTHRIDGE

POMONA

CBR/amd

SACRAMENTO

SAN BERNARDINO

SAN DIEGO

SAN FRANCISCO

SAN JOSÉ

SAN LUIS OBISPO

SAN MARCOS

SONOMA

STANISLAUS