

**OFF-CAMPUS ACTIVITIES**  
**HUMBOLDT STATE UNIVERSITY**

**Audit Report 09-62**  
**February 17, 2010**

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**BOARD OF TRUSTEES**  
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## **ABBREVIATIONS**

CMS	Common Management Systems
CNRS	College of Natural Resources and Sciences
CSU	California State University
EO	Executive Order
GC	Government Code
HSU	Humboldt State University
OCA	Off-Campus Activities
REP	Resolution of the Committee on Educational Policy

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## **EXECUTIVE SUMMARY**

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

We visited the Humboldt State University campus from September 29, 2009, through November 6, 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 6, 2009, taken as a whole, were sufficient to meet the objectives stated below.

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

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

### **STUDY ABROAD [6]**

The campus had not adequately documented value received under student exchange agreements, and agreements for study abroad and student exchanges did not contain appropriate language.

### **FIELD TRIPS [8]**

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

### **COMMUNITY ENGAGEMENT [9]**

The process for accumulating and validating service learning statistics and obtaining participant documentation for service learning activities was ineffective. The campus did not execute agreements with the internship community partners nor perform site visits to community partner locations. The campus did not consistently maintain student documentation for internships.

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## INTRODUCTION

### **BACKGROUND**

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

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

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

#### **Service Learning**

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

#### **Community Service**

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

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

#### **Internships**

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

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

### **Field Trips**

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

### **Study Abroad**

Study abroad includes the international programs administered on a systemwide basis in the Office of the Chancellor as well as campus-based programs. 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 Humboldt State University, there are organizational entities involved in OCA similar to the chancellor’s office that report to different vice presidents. The vice president for academic affairs has responsibility for the Service Learning Center, Youth Educational Services, and various colleges and departments. The vice president for administration and finance oversees the Department of Contracts and Procurement and the Office of Safety and Risk Management.

## **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.



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# OBSERVATIONS, RECOMMENDATIONS, AND CAMPUS RESPONSES

## STUDY ABROAD

### EXCHANGE RECIPROCITY

The campus had not adequately documented value received under student exchange agreements.

In the table below, “inbound” describes students from other universities attending Humboldt State University (HSU) under exchange arrangements and “outbound” means HSU students studying abroad on exchange programs. Data on the number of inbound and outbound students was available as follows:

Year	Inbound	Outbound	Difference
2006-07	12	8	4
2007-08	16	12	4
2008-09	23	9	14
2009-10	18	9	9
<b>Total</b>	<b>69</b>	<b>38</b>	<b>31</b>

Executive Order (EO) 605, *Delegation of Authority to Approve International Student Exchanges, Tuition Waivers for International Students, and Tuition Waivers for Nonresident U.S. Graduate Students*, dated July 21, 1993, 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.

The international programs director and the study abroad advisor stated that they were unaware of comparable expenses.

Inadequately documenting the value received under exchange agreements exposes the campus and California State University (CSU) to criticisms of fiscal improprieties.

### Recommendation 1

We recommend that the campus establish a system to formally review international exchange program reciprocity and limit inbound and outbound students as required.

### Campus Response

We concur. The international programs director is reviewing expenses to compare the fees waived for HSU students studying abroad on an exchange program with that of fees waived for students from abroad attending HSU on an exchange program. As of now, HSU has stopped accepting exchange students from partners with whom we have the greatest discrepancy in numbers. Going forward the

international program department will review international exchange program reciprocity and limit inbound and outbound students as required by EO 605.

Expected Completion Date: June 30, 2010

## **AGREEMENTS**

Study abroad and exchange agreements did not contain appropriate language.

We noted that exchange agreements did not include the appropriate hold harmless clauses between the exchange partner and the campus.

HSU's *Agreement and Release for Humboldt State University Bilateral Exchange Programs* contained certain provisions for indemnification (§6) and release /hold harmless for air travel (§7) which differed from the language in EO 590, *Student Air Travel*, dated March 26, 1992, and EO 1041, *California State University Student Travel Policy*, dated July 1, 2009.

*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.

The international programs director stated that he had discovered the language inconsistencies after reviewing the forms for compliance with the recently issued EO 1041.

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

### **Recommendation 2**

We recommend that the campus include appropriate language in study abroad and exchange agreements.

### **Campus Response**

We concur. HSU has updated the *Agreement and Release for Humboldt State University Bilateral Exchange Programs* with the language in EO 590, *Student Air Travel*, and EO 1041, *California State University Student Travel Policy*. The agreements now contain the appropriate hold harmless clauses between the exchange partner and the campus.

Expected Completion Date: Fully Implemented

## FIELD TRIPS

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

Our review of 21 field trips to off-campus locations during academic year 2008/09 disclosed that:

- ▶ For ten field trips, the campus lacked participant documentation.
- ▶ For ten field trips, the campus did not document that participants had received detailed instructional agendas that should have included such items as health and safety information.
- ▶ For 12 field trips, participants had not completed the release of liability and travel authorization forms. The campus had not maintained the documentation for three of these field trips.
- ▶ For ten field trips, the campus did not collect student emergency contact information or emergency medical information prior to the start of the field trip.

The HSU *Field Trip Policy*, Executive Memoranda 11-2006 (06-11) effective November 2006, states that the following items are required: site visits, a detailed instructional agenda including health and safety instructions for all participants, a completed field trip participant roster, release of liability forms, and medical authorizations for trips greater than 48 hours.

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

Government Code (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.

The extended education director stated that he was not aware of the requirement for the liability forms. The associate dean, college of natural resources and sciences (CNRS) stated that CNRS did not adopt and implement the field trip policy until the fall 2009 term. The remaining departments either could not locate the forms or were under the impression that the policy was still in draft form.

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

### **Recommendation 3**

We recommend that the campus:

- a. Reiterate existing field trip policies.
- b. Implement a reliable process to monitor and enforce compliance with such policies.

### **Campus Response**

We concur. The university will remind the campus departments to review and comply with the Field Trip Policy posted on the university's risk management website. The risk management website also has a Field Trip Guidelines/Checklist to assist with compliance with the policy. Each campus department is responsible for monitoring compliance with the Field Trip Policy. Prior to any field trip taking place, the department will ensure the policy has been adhered to.

Expected Completion Date: June 30, 2010

## **COMMUNITY ENGAGEMENT**

### **STATISTICS**

The process for accumulating and validating service learning statistics was ineffective.

Our review of service learning courses indicated that:

- ▶ Five of the courses reviewed were not actually service learning. These courses were erroneously identified in the Common Management Systems (CMS) as service learning.
- ▶ Three of the service learning courses reviewed were unable to provide required participant documentation such as service learning agreements, learning plans, activity logs, or emergency contact information before the end of fieldwork.

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 service learning director stated the CMS listing is used for reporting the service learning information to the chancellor's office and for the California Call to Serve Reports. She added that faculty is responsible for marking their courses, which include service learning components in CMS. The departments have stated that some of their courses were identified in error, as they do not have service learning components. In addition, the departments that were correctly identified as service learning did not know they were required to maintain the service learning documentation.

Unreliable statistics for service learning activities creates misleading information on program accomplishments and jeopardizes campus credibility.

#### **Recommendation 4**

We recommend that the campus:

- a. Implement a process for accumulating and validating service learning statistics.
- b. Collect and maintain required participant documentation for all service learning activities.

#### **Campus Response**

We concur. At the start of each semester, faculty will review CMS and ensure the appropriate courses are listed as service learning courses. Based on the courses identified as service learning, the service learning department will maintain participant documentation of learning agreements, learning plans, activity logs, and emergency contact information.

Expected Completion Date: June 30, 2010

### **COMMUNITY PARTNER AGREEMENTS AND SITE VISITS**

The campus did not execute agreements with the internship community partners nor perform site visits to community partner locations.

We reviewed 19 community partners that provided internships and service learning placements (nine internship and ten service learning partners, respectively) and found that:

- ▶ The campus lacked executed agreements with the community partner for eight internships. The campus did not have partner agreements with the internship partners prior to the initiation of on-site credit-bearing internship activities. The agreements did not address insurance coverage for internships.
- ▶ The campus could not provide evidence that it performed a preliminary site visit or that it had sufficient familiarity with the community partner for any of the 19 placements.

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

EO 715, *California State University Risk Management Policy*, dated October 27, 1999, states that, in the process of developing and implementing any off-campus activities involving students, site visits should identify the risks to the students and any steps taken to mitigate those risks for the students and the university. The site visit shall be part of the partner agreement process and shall be done before the execution of such an agreement.

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

The department chairs stated that they had found it easier to work informally with the local organizations for the setup and management of student internships. In addition, they stated that they were unaware of the requirement to maintain the student documentation, have agency agreements, perform site visits, and provide health and safety information for the internships and service learning activities.

Failure to obtain appropriate agreements with internship partners affects student safety and exposes the university to liability and/or embarrassment due to misunderstandings of risks and responsibilities.

### **Recommendation 5**

We recommend that the campus:

- a. Perform site visits at all community partner locations.
- b. Obtain internship agreements for all community partners.
- c. Ensure sufficient insurance coverage for all community partners.

### **Campus Response**

We concur. The university is developing a campus policy on internships. The policy will dictate when site visits will be performed and alternative documentation required to demonstrate sufficient familiarity with the internship if a site visit is not feasible. The campus is reviewing its community partnerships that provide internships and service learning placements and is documenting agency agreements, health and safety information, and student documentation. In addition, the campus is documenting compliance with EO 849 and ensuring sufficient insurance coverage for its partners.

Expected Completion Date: June 30, 2010

### **INTERNSHIPS**

The campus did not consistently maintain student documentation for internships.

The review of nine internships disclosed that:

- ▶ Six did not maintain the student service log after the end of the semester.
- ▶ Seven did not require liability waivers or the students' emergency information.
- ▶ Five did not provide health and safety information to the students.

The 2002 CSU publication *Best Practices for Managing Risks in Service Learning* provides for orientation presentations and student placement records.

EO 715, *California State University Risk Management Policy*, dated October 27, 1999, states that, in the process of developing and implementing any off-campus activities involving students, site visits should identify the risks to the students and any steps taken to mitigate those risks for the students and the university. The site visit shall be part of the partner agreement process and shall be done before the execution of such an agreement.

The department chairs stated that they were unaware of the requirement to maintain the student documentation, perform site visits, and provide health and safety information for the internships.

Failure to maintain student program documentation and communicate appropriate information regarding policies, procedures, and risk in community engagement activities jeopardizes student safety and exposes the university to liability and/or embarrassment due to misunderstandings of risks and responsibilities.

#### **Recommendation 6**

We recommend that the campus retain sufficient student program documentation for all internships.

#### **Campus Response**

We concur. As noted in recommendation 5, the university is developing a campus policy on internships. The campus is reviewing its community partnerships that provide internships and documenting agency agreements, health and safety information, and student documentation. The student documentation will include student service logs and liability waivers or emergency information.

Expected Completion Date: June 30, 2010

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## **APPENDIX A: PERSONNEL CONTACTED**

<u>Name</u>	<u>Title</u>
Rollin C. Richmond	President
Joy Adams	Assistant Professor, Geography Department
Jyl Barnett	Service Learning Community Partner Liaison
Annie Bolick-Floss	Director, Service Learning
Lorena Boswell	Program Manager, Youth Educational Services
David Bugbee	Director, Contracts, Procurement, and Risk Management
Mary Ann Creadon	Chair, Department of English
Donna Gephart	Administrative Assistant, College of Professional Studies
Carl Hansen	Director, Extended Education and International Programs
Kenna Hyatt	Administrative Support Coordinator, Department of World Languages and Cultures
Kim King	Administrative Support Assistant, Plant Operations
Mark Larson	Chair, Department of Journalism and Mass Communication
Thomas Mays	Chair, Department of History
Michelle McCall-Wallace	Director of Reese Bullen Gallery
Burt Nordstrom	Vice President of Administrative Affairs
Lynne Sandstrom	Director, Financial Services
Penelope Shaw	Study Abroad Advisor
Steve Smith	Associate Dean, College of Natural Resources and Sciences
Carol Terry	Associate Vice President, Business Services
Harry Wells	Associate Dean, College of Arts, Humanities and Social Sciences





**HUMBOLDT STATE UNIVERSITY**

Vice President of Administrative Affairs

RECEIVED  
UNIVERSITY AUDITOR

APR - 2 2010

THE CALIFORNIA STATE  
UNIVERSITY

March 24, 2010

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

**Audit Report 09-62 - Off-Campus Activities**

Dear Mr. Mandel:

Please find enclosed Humboldt State University's response to Audit Report 09-62 - Off-Campus Activities, findings #1 through #6.

Please review the information and let us know if there are any questions, concerns, or if we can provide additional information. We appreciate the effort you and your staff have made to indicate areas where our procedures could be strengthened.

Please direct questions regarding the responses to Lynne Sandstrom, CPA, Financial Services at (707) 826-4031 or [les37@humboldt.edu](mailto:les37@humboldt.edu).

Sincerely,

Burt Nordstrom  
Vice President

Enclosures

cc: Rollin C. Richmond, President (w/o enclosures)  
Carol Terry, Associate Vice President of Business Services (w/o enclosures)

**OFF-CAMPUS ACTIVITIES**  
**HUMBOLDT STATE UNIVERSITY**

**Audit Report 09-62**

**STUDY ABROAD**

**EXCHANGE RECIPROCITY**

**Recommendation 1**

We recommend that the campus establish a system to formally review international exchange program reciprocity and limit inbound and outbound students as required.

**Campus Response**

We concur. The International Programs Director is reviewing expenses to compare the fees waived for HSU students studying abroad on an exchange program with that of fees waived for students from abroad attending HSU on an exchange program. As of now HSU has stopped accepting exchange students from partners with whom we have the greatest discrepancy in numbers. Going forward the International Program department will review international exchange program reciprocity and limit inbound and outbound students as required by Executive Order 605.

Expected Completion Date: June 30, 2010

**AGREEMENTS**

**Recommendation 2**

We recommend that the campus include appropriate language in study abroad and exchange agreements.

**Campus Response**

We concur. HSU has updated the Agreement and Release for Humboldt State University Bilateral Exchange Programs with the language in EO 590, Student Air Travel, and EO 1041, California State University Student Travel Policy. The agreements now contain the appropriate hold harmless clauses between the exchange partner and the campus.

Expected Completion Date: Fully Implemented

## FIELD TRIPS

### Recommendation 3

We recommend that the campus:

- a. Reiterate existing field trip policies.
- b. Implement a reliable process to monitor and enforce compliance with such policies.

### Campus Response

We concur. The University will remind the Campus departments to review and comply with the Field Trip Policy posted on the University's risk management website. The risk management website also has a Field Trip Guidelines/Checklist to assist with compliance with the policy. Each Campus department is responsible for monitoring compliance with the Field Trip Policy. Prior to any field trip taking place the department will ensure the Policy has been adhered to.

Expected Completion Date: June 30, 2010

## COMMUNITY ENGAGEMENT

### STATISTICS

### Recommendation 4

We recommend that the campus:

- a. Implement a process for accumulating and validating service learning statistics.
- b. Collect and maintain required participant documentation for all service learning activities.

### Campus Response

We concur. At the start of each semester Faculty will review Common Management Systems and ensure the appropriate courses are listed as service learning courses. Based on the courses identified as Service Learning, the Service Learning Department will maintain participant documentation of learning agreements, learning plans, activity logs and emergency contact information.

Expected Completion Date: June 30, 2010

## COMMUNITY PARTNER AGREEMENTS AND SITE VISITS

### Recommendation 5

We recommend that the campus:

- a. Perform site visits at all community partner locations.
- b. Obtain internship agreements for all community partners.
- c. Ensure sufficient insurance coverage for all community partners.

### Campus Response

We concur. The University is developing a Campus policy on Internships. The Policy will dictate when site visits will be performed and alternative documentation required to demonstrate sufficient familiarity with the internship if a site visit is not feasible.

The Campus is reviewing its community partnerships that provide internships and service learning placements and is documenting agency agreements, health and safety information, and student documentation. In addition, the Campus is documenting compliance with Executive Order 849 and ensuring sufficient insurance coverage for its partners.

Expected Completion Date: June 30, 2010

## INTERNSHIPS

### Recommendation 6

We recommend that the campus retain sufficient student program documentation for all internships.

### Campus Response

We concur. As noted in recommendation 5, the University is developing a Campus policy on Internships. The Campus is reviewing its community partnerships that provide internships and documenting agency agreements, health and safety information, and student documentation. The student documentation will include student service logs and liability waivers or emergency information.

Expected Completion Date: June 30, 2010

THE CALIFORNIA STATE UNIVERSITY  
OFFICE OF THE CHANCELLOR

BAKERSFIELD

April 30, 2010

CHANNEL ISLANDS

CHICO

**MEMORANDUM**

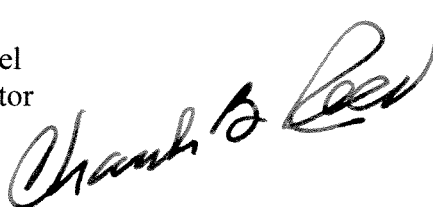
DOMINGUEZ HILLS

EAST BAY

TO: Mr. Larry Mandel  
University Auditor

FRESNO

FROM: Charles B. Reed  
Chancellor



FULLERTON

HUMBOLDT

SUBJECT: Draft Final Report 09-62 on *Off-Campus Activities*,  
Humboldt State University

LONG BEACH

LOS ANGELES

In response to your memorandum of April 30, 2010, I accept the response as submitted with the draft final report on *Off-Campus Activities*, Humboldt State University.

MARITIME ACADEMY

MONTEREY BAY

NORTHRIDGE

CBR/amd

POMONA

SACRAMENTO

SAN BERNARDINO

SAN DIEGO

SAN FRANCISCO

SAN JOSÉ

SAN LUIS OBISPO

SAN MARCOS

SONOMA

STANISLAUS