I What will this policy do?
The risk management policy seeks to ensure the safety of students placed in academic credit-bearing off-campus activities including internships, CIP, service-learning and pre-enrollment required service.

II Why do we have to make these changes?
The CSU Chancellor’s Office requires all CSU campuses to comply with Risk Management procedures including placement agreements, evidence of insurance and learning plans for internships and service-learning. See Student Internships—Executive Order No. 1064.

III Will these changes restrict faculty or departmental autonomy over internships?
No, faculty/departments will continue to structure their placements in complete autonomy including requirements for students’ participation, supervisory assignments, program orientations, and program design.

IV Do faculty or departments have to stop placing students on site until the risk management policy and procedures are done?
No, please continue to place students. The roll out of these changes will happen gradually over several years. We will begin implementing processes and software over the next year. We will adjust and make changes from there.

V Will this policy eliminate partnering with organizations I work with?
Other CSUs tell us that there are some types of organizations and projects that are more challenging to work with under the new guidelines. This doesn’t mean that faculty will no longer be able to work with them or send students to work with them. It means that the process is a bit slower and/or the process burden may be higher for faculty, administrators, and the CCE. These are:
1. Work taking place in private homes.
2. Projects in which students are driving as the activity, for example, delivering food for Meals on Wheels. Driving to the activity is not a concern.
3. Large national organizations, the American Red Cross, for example, with local affiliates in which the local affiliate does not have authorization to enter into contracts and the national organization does not prioritize our partnership.
4. Very small organizations operating out of private homes.
5. Grassroots, nontraditional, and unincorporated organizations.

It is worth noting that other CSUs do not report special challenges in working with organizations in distant locations.

VI Isn’t there a deadline for when departments and faculty have to implement the new policy and procedures?
The proposed procedures reflect that different departments and community partners need different timelines and for this reason, the hard deadline will be in several years, giving all a chance to adjust.

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VII Why are faculty and departments working with the CCE to implement these changes?
It is important for compliance with CSU regulations and also for consistency across internship experiences that our campus has a unit that helps coordinate credit-bearing internships, and on our campus, that unit is the CCE. We know that some departments have been working directly with Contracts and Procurement, and they may continue to do so for the next 24 months. Contracts and Procurement does not have the capacity to work with additional departments that are not currently working with them.

VIII Do all faculty and departments have to implement the exact steps outlined in CCE procedures? What are the minimum requirements?
Departments and faculty don’t need to change anything now, unless they want to. In the long run, at a minimum:
1. All partnering sites will need to have insurance information on file and an agreement in place with SSU. Faculty will need to check the system to see if the site is approved. If it is not, faculty will send an email using a provided template to the site so that the process of completing the agreement can begin. In most cases, students can begin working with the site while the agreement process is being completed. CCE will assist faculty and partnering sites with completing the agreement.
2. Departments will need to require students to register in the online system. This includes the completion of an Orientation video (in the online system), Media Release form (in the online system), and Liability Waiver (printed from the online system). The Liability Waiver will be scanned and uploaded to the online system so that duplication of all three documents is unnecessary throughout the students’ SSU career. This means that if students are already registered in the online system, departments can skip this step and the Liability Waiver mentioned below.
3. Departments will keep Liability Waiver with Internship Agreement form/syllabi active for three years.

The policy states that supervising faculty are responsible for the following:
1. Verify that the internship is undertaken only by students with sufficient academic background to benefit from the experiences (minimum GPA, class status, major, etc.).
2. Collaborate with the appropriate internship supervisor of the host organization that the internship opportunity provides an educationally appropriate experience.
3. Verify that the internship takes place outside the traditional classroom and that the practical learning component of an internship assignment shall total at least forty-five hours per unit of credit.
4. Develop and approve the Internship Agreement form with the student prior to the end of registration.
5. Designate mechanisms that guarantee oversight of the internship experience during the semester, including progress on academic learning objectives and providing for integration...
of academic and practical learning. Keep adequate records of the scope, objectives, and criteria for evaluation of all academic internships.

6. Collect and review evaluations by the students and on-site supervisors.
7. Upon completion of internship, evaluate student’s performance and assign a grade.
8. If a grade of incomplete is to be assigned, the faculty supervisor coordinates with the site supervisor to outline the remaining work to be completed for the assignment of a final grade.

IX What risk do faculty take on when managing internships?
The risk that faculty take when managing internships is similar to that involved in teaching a course, but the individual placements and the work with community partners does increase the complexity of risk management. The purpose of the policy and procedures is to lower the risk. If faculty are compliant with the internship policy, the CSU system will represent you in the case of legal action as a result of an internship the faculty member sponsors. Faculty may also want to investigate the professional liability insurance that is provided to all CFA members.

X Has this been done at other campuses?
Yes. The Center for Community Engagement is using best practices and lessons learned from other campuses to implement risk management procedures at SSU. In addition to years of discussions, written materials were also reviewed.

Most of the internship risk management procedures follow the procedures laid out in the CSU’s Resource Guide to Managing Risk in Service Learning. SSU’s draft procedures most closely follow the model set by SFSU and approved by the Office of the Chancellor. These are unfortunately not available online.

SSU’s draft policy most closely resembles CSU San Marcos Student Internships Policy. Additional input came from:

- CSU, Bakersfield Internships, Service Learning, and Volunteer Programs Policy & Process Guidelines
- CSU, Channel Islands Academic Internship Policy
- CSU, Chico Internship Policy
- CSU, East Bay Educational Program for Field Placements & Internships focuses on accessibility and not available online
- CSU, Fullerton Policy on Academic Internships
- CSU, Monterey Bay Internship Policy
- CSU, Northridge Undergraduate Academic Internship Policy
- CSU, Stanislaus Policy for Student Internships
- Fresno State University Student Experiential Learning Policy in draft form and not available online
- Humboldt State University Policy on Academic Internships
- San Jose State University Standards for Academic Internship Contracts
XI How have faculty, staff and administrators been involved in the development and vetting process of the policy and procedures?

As of September 2015, Merith Weisman was assigned the work of developing the draft internship policy for SSU. She began by reviewing and borrowing language from all the other CSU internship policies. Up to this point, the document has been vetted and edited by:

- Karen Moranski, AVP
- Melinda Milligan, Chair, EPC and Professor, Sociology (Summer 2017)
- Laura Watt, Chair, EPC and Professor, Geography and Environmental Planning (Summer 2017)
- Melinda Barnard, AVP
- Brent Boyer, Disability Services for Students
- Ianthe Brautigan Swensen, Internship Coordinator for the School Arts and Humanities
- Marco Calavito, Chair, Communication Studies
- Lorna Catford, Psychology Internship Coordinator
- Duane Dove, School of Business & Economics
- Donna Garbesi, Advisor, Hutchins
- Lena McQuade, Department of Women & Gender Studies
- Becky Petrow, International Student Coordinator
- Margie Purser, Department of Anthropology
- Jeremy Qualls, Director of Academic Planning and Resources, School of Science & Technology
- Beth Warner, School of Extended & International Education
- Richard Whitkus, Interim AVP
- Department of Communication Studies
- FSAC
- EPC

It was also circulated digitally to other faculty members and departments. Almost all recommendations made by faculty have been incorporated into the draft policy. When recommendations have not been incorporated, it is due to conflicts with other recommendations or context from the CO.

The Academic Senate requested that the policy be approved by faculty governance, so formal vetting is occurring with EPC in spring 2018.

The draft process was developed with Risk Management and Contracts & Procurement. Faculty, students and community partners were invited to an Open House on May 5, 2016 to provide input and feedback on the draft process. Almost all recommendations made at the Open House have been incorporated into the draft process. The only one that has not been integrated is a path for
students, faculty, and partners to waive liability protection circumventing the need for a contract. This path was not approved by Risk Management and Contracts & Procurement.

XII What are the next steps?

- Edits and approval of the policy by faculty governance.
- Testing of the process by three departments (Chicano & Latino Studies, Kinesiology, Psychology), three organizations (Cypress School, Community Action Partnership of Sonoma County, Sustainable North Bay), and three students.
- Adjustments to process resulting from testing.
- Gradual implementation of process on a department-by-department basis with ongoing adjustments as we learn.