



**California State University, Sacramento  
Office of Academic Affairs**

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December 16, 2010

**MEMORANDUM**

**TO:** Academic Faculty, Administration, and Staff

**FROM:** Joseph F. Sheley  
Provost

A handwritten signature in black ink, appearing to read 'J. Sheley', written over a large, faint watermark of the number '2'.

**SUBJECT:** Procedures for Off-Campus Activities regarding Academic Internships

For many years most academic programs on campus have come to value internships as an important community engagement activity for our students. Internships promote student learning through active participation within the professional environment in planned and meaningful ways. As important as these experiences are for our students, it is equally important that we become increasingly attentive to the potential risks to our students in internship settings. Indeed, a recent audit by the Chancellor's Office found that the campus needs to implement concrete and explicit procedures, in compliance with Executive Order 715 (<http://www.calstate.edu/eo/EO-715.pdf>) and Executive Order 849 (<http://www.calstate.edu/eo/EO-849.pdf>), designed to minimize the risk exposures and safety issues associated with placement of students in off-campus experiences. Many programs on campus have considerable experience in implementing risk management procedures for student internships. However, some programs are operating with unclear, inconsistent, and inadequate procedures thus increasing the risk to the University and to our students.

In compliance with various executive orders and system policies, we have instituted the following procedure now required for all academic internships:

The administration of internships is the responsibility of deans and department chairs in consultation with faculty members/internship coordinators whose work and teaching result in the placement of students in approved internship programs. Approved internship programs are those that involve the university in some active way such as awarding credit for the experience or taking an active role in placing the student with a specified organization/agency.

This procedure is intended to: 1) increase student safety, 2) decrease liability exposure to the University, and 3) reduce the liability of faculty members as they – in good faith and after their due diligence – recommend internship sites to students. Therefore, prior to recommending internship placement sites to students, departments and faculty members shall:

- Exercise due diligence to: (a) identify reasonably foreseeable hazards (legal, physical, environmental, technological), and (b) acquaint themselves to the extent possible with the applicable policies of the organization. In situations where site visits have not been conducted

the Department/Program must have evidence that demonstrates knowledge of and familiarity with the organization, location and environment of the internship. In cases where site visits have been conducted, documentation should include evidence of the visit such as date and persons met.

- Provide student orientations prior to each internship placement. Topics must include health/safety information, emergency contact information and emergency preparedness instructions, and student internship code of conduct. Participating students must also be notified in writing of identified hazards and steps taken to mitigate them or steps the students should take to mitigate known hazards.
- Obtain signed liability waivers from all prospective participating internship students.
- Retain evidence (see document retention policy below) that emergency contact information was made available to participants.
- Obtain fully executed placement agreements with internship community partners that specify minimum insurance requirements and appropriate hold-harmless provisions. Exceptions to the insurance provision may be permitted where the student intern is also in a valid employee-employer relationship in which the employer has provided the employee with the customary insurance and liability protections as is required of employers.
- Obtain fully documented placement agreements that, among other things, identify a contact within the organization whose duties will include supervision and evaluation of the intern and that specify the factors that will guide evaluation of the intern's experience, including number of hours and types of duties.

It is the responsibility of Department Chairs to retain all required documentation to support evidence of site visits, student orientations, student release of liability forms, and placement agreements for three years commencing with the date the internship ended for each student. Because this requirement for document retention may create space/storage issues for departments with large numbers of internships, it is permissible to send the required documents for archiving in accordance with the records management policy linked below. For further information about records management and the archiving process, please visit the following link:

<http://www.csus.edu/aba/records-management/index.html>

With your support, we will strengthen our internship programs in very positive ways. It is important that we adhere to these procedures to reinforce our commitment to quality internship programs, reduce risks for our students as they engage in learning opportunities within various communities, reduce risk to faculty members who arrange for student internships, and ensure compliance with appropriate university requirements.

Additionally, the University Office of Risk Management has developed various guidelines and forms to assist you in implementing the procedures outlined above. Please contact that office or visit their website at:

<http://www.rms.csus.edu/riskmanagement>

Finally, it should be noted that while these procedures will enable us to comply with the Chancellor's Audit requirements in the short term, we also recognize there will soon be a need to further revise and clarify these policies for the long term. Therefore, after a period of initial implementation, we will commence a process to review and update the policy on internships consistent with any changes we anticipate from the Chancellor's Office and pedagogical situations on this campus. Questions related to the implementation of this policy should be directed to Dr. Donald Taylor at 278-5933 or [dtaylor@csus.edu](mailto:dtaylor@csus.edu) in my office.