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September 9, 2011

**MEMORANDUM**

**TO:** CSU Presidents

**FROM:** Charles B. Reed  
Chancellor



**SUBJECT:** Student Internships—Executive Order No. 1064

Attached is a copy of Executive Order No. 1064, which establishes guidelines for campus internship policy and procedures.

In accordance with policy of the California State University, the campus president has the responsibility for implementing executive orders where applicable and for maintaining the campus repository and index for all executive orders.

If you have questions regarding this executive order, please contact the Office of International Programs at (562) 951-4790.

CBR/bjc

Attachment

c: Executive Staff, Office of the Chancellor

**THE CALIFORNIA STATE UNIVERSITY**  
**Office of the Chancellor**  
**401 Golden Shore**  
**Long Beach, California 90802-4210**  
**(562) 951-4790**

**Executive Order:** 1064  
**Effective Date:** September 9, 2011  
**Supersedes:** No Prior Executive Order  
**Title:** Student Internships

This executive order is issued pursuant to the Standing Orders of the Board of Trustees, Section II (a) and (c). The California State University recognizes the beneficial educational purpose of student internships, as well as the need to maximize the educational experience while mitigating the risks to participants and minimizing the university's liability exposure.

**I. Purpose**

This executive order establishes guidelines for campus student internship policy and procedures and delegates responsibility for implementation to the campus president.

**II. Delegation of Authority**

The president is delegated the responsibility for the development, implementation and maintenance of the campus student internship policy, and to ensure there is a means for future review of the policy that is updated and communicated to faculty and staff at appropriate intervals.

**III. Terms and Definitions**

An internship formally integrates the student's academic study with practical experience in a cooperating organization. It is an off-campus activity designed to serve educational purposes by offering experience in a service learning<sup>1</sup>, business, non-profit, or government setting. For the purpose of this executive order "internship" does not include teacher preparation placements or clinical placements such as for nursing, counseling, physical therapy or occupational therapy.

An internship site is the organization at which the internship takes place.

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<sup>1</sup> See "Managing Risk in Service Learning" [http://www.calstate.edu/cce/resource\\_center/servlearn\\_risk.shtml](http://www.calstate.edu/cce/resource_center/servlearn_risk.shtml) for additional guidance.

#### IV. Campus Student Internship Policy

Each campus is required to develop, implement, maintain and publish a student internship policy governing internships where the university makes the placement. Electronic copies of internship-related documents are permissible. See technical letter RM 2011-01 and the accompanying *Release of Liability Handbook*.

General internship policy shall, at a minimum, include the following:

##### A. Internship Planning

- Individual to be responsible for oversight of the policy;
- Academic policies for establishing an internship;
- Awarding of academic credit;
- Accommodation plan for students with special needs;
- Emergency response plan;
- Student compensation, if applicable; and
- Minimum requirements for agreements between the internship site and university.

##### B. Placement Assessment

Prior to placing students, an assessment of the appropriateness of the internship site as a placement for CSU students shall be conducted. A written assessment summary of the internship site shall be completed and retained by the responsible campus office and be available for review. That summary shall respond, at minimum, to the following considerations:

- The potential for the internship site to provide an educationally appropriate experience;
- Identification of the potential risks of the internship site;
- Identification of an appropriate individual from the host organization to supervise the student at the internship site;
- Evaluation of the educational environment;
- Evaluation of the potential for student academic experience and its relationship to the student's academic study;
- Selection criteria and basic skills required of the student; and
- Agreement of internship site to meet campus expectations, including a signed placement agreement between the internship site and the CSU that addresses both the internship site's and the campus's role in the internship, as well as the student's responsibilities.

##### C. Internship Site Visits

Campus policy shall include criteria for when to conduct a site visit. The site visit may be bypassed if the campus can demonstrate and document sufficient knowledge of the internship site. This could be accomplished through online review, published materials or direct contact with the site.

D. Placement and Orientation

Before the student begins the internship, the following steps shall be completed:

- Student orientation that includes conduct expectations, health and safety instructions, and emergency contacts;
- Student emergency contact form to be completed. If the internship placement is not required as part of the student's academic program, the student must complete the liability waiver form (see Executive Order 1051); and
- Learning agreement form signed by the student, internship site supervisor and university representative. The form addresses the work to be provided by the student, the learning outcomes, and the placement logistics (including hours and pay).

Documentation of the above items shall be retained by the campus supervising office or a designated campus office.

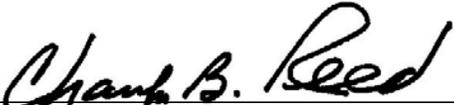
E. Annual Review

Campus policy shall include a plan for annual review of the internships, both for educational purposes and for safety to the students. This review should take into account information gathered from on-site supervisors, faculty, university staff, and student experience.

V. **Document Retention**

The campus is expected to retain documents related to each internship consistent with systemwide and campus document retention guidelines. See Executive Order 1031.

It is recommended that the instructional agenda, name and contact information for the internship site, student information, and executed liability waiver be retained together after the conclusion of the semester/quarter during which the internship took place. Electronic copies of the documents are permissible. See technical letter RM 2011-01 and the accompanying *Release of Liability Handbook*.

  
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Charles B. Reed, Chancellor

Date: September 9, 2011

## Campus Statement for E.O. 1064: Section A

### I. Internship Planning

#### a. Individual to be responsible for oversight of the policy

- i. The Vice President for Student Affairs in consultation with campus partners appoints the person responsible.

#### b. Academic policies for establishing an internship

- i. For-credit internships<sup>1</sup> are usually offered as academic courses that are listed according to College. Academic policies regarding courses are contained in the current version of SDSU University Senate *Policy File*. Course development link: <http://www-rohan.sdsu.edu/~acserv/>

#### c. Awarding of academic credit

- i. The awarding of academic credit varies according to College, School and academic department. Course development materials are contained in the curriculum guide (link: <http://www-rohan.sdsu.edu/~acserv/>). The i-footnote is used to designate internship courses.

#### d. Accommodation plan for students with special needs

- i. SDSU Student Disability Services administers items related to students with special needs: [http://go.sdsu.edu/student\\_affairs/sds/](http://go.sdsu.edu/student_affairs/sds/)

#### e. Emergency response plan

- i. Emergency response plans are required as part of the Internship Site Questionnaire (ISQ). See item 9 of the current ISQ for this statement: <http://bfa.sdsu.edu/prosrvcs/servlearning.htm>
- ii. The University emergency plan at this link: <http://bfa.sdsu.edu/emergency/>.

#### f. Student Compensation, if applicable

- i. If employers offer an internship as “unpaid and for-credit” only, the employer should be encouraged to review this decision with their human resources area, and refer to the Fair Labor Standards Act: <https://www.dol.gov/whd/regs/compliance/whdfs71.pdf>

#### g. Minimum requirements for agreements between the internship site and university

- i. The university requires a fully executed Service Learning Agreement (SLA) and Internship Site Questionnaire (ISQ).
- ii. Links to the Service Learning Agreement and Internship Site Questionnaire will be active here: <http://bfa.sdsu.edu/prosrvcs/servlearning.htm>

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<sup>1</sup> In this document the term “internship” represents “internships where the university makes a placement,” and includes any internship taken for-credit. ([Executive Order 1064, page 2](#)).

## Campus Standards for E.O. 1064 Section B

### I. Placement Assessment

Per E.O. 1064: Prior to placing students, an assessment of the appropriateness of the internship site as a placement for CSU students shall be conducted. A written assessment summary of the internship site shall be completed and retained by the responsible campus office and be available for review. That summary shall respond to the following considerations:

#### a. The potential for the internship site to provide an educationally appropriate experience

- i. Academic areas shall determine the minimum criteria (and means to assess these criteria) for potential internship sites to meet in providing students an educationally appropriate experience.
  1. Be familiar with the Fair Labor Standards Act guidelines regarding internships (<https://goo.gl/iEJrbz>).
  2. Be familiar with Americans with Disabilities Act as this factor may be relevant to internship placement (<https://goo.gl/AYJMOG>).
  3. Be familiar with the CSU Learning Plan and personalize it to be in alignment with departmental and educational factors (<https://goo.gl/bsxp3L>).

#### b. Identification of the potential risks of the internship site

San Diego State University manages reviews relating to risk via the Internship Site Questionnaire. The current online system for managing the Internship Site Questionnaire is AdobeSign\* (<https://goo.gl/FYHskz>). A departmental contact needs to coordinate and manage the Internship Site Questionnaire. The Internship Site Questionnaire can also be used to coordinate annual outreach and site reviews. \*All SDSU faculty and staff have access to AdobeSign. Go to <http://it.sdsu.edu/help.aspx> to request an AdobeSign account.

#### c. Identification of an appropriate individual from the host organization to supervise the student at the internship site

- i. For San Diego State University, an “appropriate” site supervisor would be an individual who is selected by the academic unit offering the internship experience.
- ii. Basic criteria to use in selecting an internship site supervisor include the following: the selected individual a) could fulfill expectations from the academic unit, the University, b) be available / responsive to ongoing communication regarding the internship experience, and c) be a full-time professional staff member.

- iii. Additional guidelines for identifying an “appropriate” site supervisor would need to account for the internship site: a) the organization’s structure, b) on the formal / informal nature of its internship program, and c) its experience with hosting interns (including how long the organization has existed and its purpose for recruiting interns).<sup>1</sup>

**d. Evaluation of the educational environment**

Broadly defined, the “educational environment” would be those factors that impact the quality, function and accountability related to the internship.

- i. Guidelines for evaluation of the educational environment:
  - 1. Quality: Syllabus, course requirements and alignment with a discipline would be determined by the academic unit in conjunction with its affiliate College.
  - 2. Function: Ongoing risk assessment would be encompassed by this category. For new internship sites, this item is addressed above. See item I. b., Internship Site Questionnaire. For a discussion of ongoing risk assessment, see items contained under [Annual Review, Section E](#) of this document.<sup>2</sup>
  - 3. Accountability: Reporting on items related to site contact, changes in risks associated with student involvement, and end-of-semester evaluation.
    - a. This information will be used by academic unit and affiliate College for course development and succession planning.
    - b. This information will be used in aggregate by San Diego State in preparing for University (CSU, California State University) audits.

**e. Evaluation of the potential for student academic experience and its relationship to the student’s academic study.**

- i. See items [a. – c. above](#).
- ii. Recommended areas for review:
  - 1. Be familiar with the advice offered to organizations intending to host interns / offer internships (<https://goo.gl/Em5gMb>).
  - 2. Be familiar with Fair Labor Standards Act regarding internships (<https://goo.gl/jEJrbz>).

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<sup>1</sup> Include relevant information from screening criteria used in SDSU Career Services.

<sup>2</sup> For information about Site Review documents, see [Section A \(Internship Planning\) of this document](#), and [Section E \(Annual Review\) of this document](#).

3. Be familiar with [Section C](#) of this document about internship site reviews<sup>3</sup>
4. Consider developing a statement for the academic unit about the relevance of internships (as high-impact practices) to students' educational experience.
5. Be familiar with items that could trigger a site review. See Internship Site Questionnaire: <http://bfa.sdsu.edu/prosrvcs/servlearning.htm>

**f. Selection criteria and basic skills required of the student.**

Academic areas determine requirements relevant for the internship experience that they deem appropriate for students within their unit.

The following are recommended as possible items for review in addressing this item:

- i. Require position descriptions from organizations for each internship.
  1. Provide internship site with an internship position template (<https://goo.gl/zTbRVz>)
- ii. Register organizations and internship postings in Aztec Career Connection (<http://career.sdsu.edu>)
  1. System allows for the following items to be used in CSU audits:
    - a. Identifying originations with a Service Learning Agreement (and where needed disabling of organization accounts)
    - b. Tracking of internship postings and applications
    - c. Improved student access
  2. Recommend consulting with Career Services to access and navigate Aztec Career Connection (<http://career.sdsu.edu>)
- i. Be familiar with the CSU Learning Plan and personalize it to be in alignment with departmental and educational factors (<https://goo.gl/bsxp3L>)

**g. Agreement of internship site to meet campus expectations, including signed placement agreement (at SDSU the Service Learning Agreement) between the internship site and the CSU that addresses both the internship site's and the campus's role in the internship, as well as the student's responsibilities**

- i. See items [a. – f. above](#) and [Section A: Internship Planning](#)

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<sup>3</sup> At a minimum include statements about internship projects, tracking/reporting internship hours, and emergency contact information.

## Campus Standards for E.O. 1064 Section C

### I. Internship Site Visits

[Per E.O. 1064](#): Campus policy shall include criteria for when to conduct a site visit. The site visit may be bypassed if the campus can demonstrate and document sufficient knowledge of the internship site. This could be accomplished through online review, published materials or direct contact with the site.

An internship site review should be conducted once during an academic year. Academic areas placing students in internship sites and/or awarding academic credit should conduct site visits to assess sites for the educational and risk factors noted in [Executive Order 1064](#). At a minimum, the Internship Site Questionnaire and any College- or Departmental-level requirements shall be included as criteria for conducting site visits.

Internship site visits can be completed without an in-person visit to the site when sufficient information can be gained via an Internship Site Questionnaire and ongoing communication with the site via a representative of the internship site.

An internship site review should be used to determine at a minimum the following:

- a. Current site contact, and to verify contact information
  - i. Direct site contact should occur within one academic year of the last student from San Diego State University to intern at the site.
  - ii. Verify location of site contact, e.g. personal residence, office, virtual.
- b. That the site is still functioning, and at the address(es) listed in the Service Learning Agreement (and Internship Site Questionnaire), and that work will not be completed 100% remotely or virtually (see e. iii and iv below for additional information) by the student.
- c. That risk and educational factors identified in previous site reviews of the internship site are verified.
- d. Identify if changes or updates noted in the current internship site review warrant additional actions such as an on-site review, cancellation of the current Service Learning Agreement, and/or the need to update related items such as educational factors.
- e. If applicable,
  - i. Student concerns registered about the site are reviewed with the site during the internship site visit.
  - ii. Verify knowledge of problems with an internship site, including factors such as crimes at or near the site, closure of the site or risks to students interning at the internship site.

- iii. If the site is “virtual” that the student has an internship site supervisor who can guarantee that the student is learning via the internship and guides the internship experience.
- iv. The site supervisor also needs to ensure that the “virtual” experience does not place students at risk when engaged with the site or the training that it provides.

## Campus Standards for E.O. 1064 Section D

### I. Placement and Orientation

Per E.O. 1064: Before the student begins the internship, the following steps shall be completed:

Documentation of the following shall be retained by the campus supervising office or a designated campus office. Further, documentation shall be maintained and managed by the department offering the internship with guidance from the College where the department resides.

- a. Student orientation that includes conduct expectations, health and safety instructions and emergency contacts.
  - i. The internship site should provide an internship orientation that at a minimum includes conduct expectations, the internship program and participants in the program, any relevant policies and procedures, and, where appropriate, health and safety instructions (e.g., exiting the facility in an emergency, working with heavy items or in environments where they may have exposure to fumes from machines).
- b. Student emergency contact form to be completed. If the internship placement is not required as part of the student's academic program, the student must complete the release of liability waiver form per Executive Order 1051 (<https://www.calstate.edu/eo/EO-1051.html>); and
- c. Learning Plan form signed by the student, internship site supervisor and university representative. The form addresses the work to be provided by the student, the learning outcomes, and the placement logistics (including hours and pay).
  - i. Learning Plan may be covered by the course syllabus (and assignments outlined in the syllabus).
  - ii. Learning Plans are also explained in the California State University Resource Guide for Risk in Service Learning.
    1. Link to California State University Resource Guide for Risk in Service Learning- <https://goo.gl/N8jRpp>
      1. Go to The Learning Plan as a Tool for Risk Management section that includes the Learning Plan template (pages 43-47).
    2. Link to California State University Resource Guide for Risk in Service Learning Agreement website: <https://goo.gl/bsxp3L>
      1. Click on Forms and Templates link and then on Learning Plan link to view the template
  - iii. Academic units determine how this document might be used in defining the internship experience.

## Campus Standards for E.O. 1064 Section E

### I. Annual Review

Per E.O. 1064: Campus policy shall include a plan for annual review of the internships, both for educational purposes and for safety to the students. This review should take into account information gathered from on-site supervisors, faculty, university staff and student experience.

Academic areas placing students in internship sites should conduct on an annual basis a review of the internships affiliated with their area. Per Section C of this statement, internship site reviews that have as their bases the Internship Site Questionnaire, Service Learning Agreement and ongoing communication with the internship site, should provide the ability to acquire and report on information that this Section of the Executive Order outlines. Also, at a minimum annual reviews should provide the following:

- a. Current site contact, and to verify contact information
  - i. Direct site contact should occur within one academic year of the last student from San Diego State University to intern at the site.
  - ii. Verify location of site contact, e.g. personal residence, office, virtual.
- b. That the site is still functioning, and at the address(es) on the Service Learning Agreement (SLA).
  - i. If the address has changed, contact Contract & Procurement Management to have the address changed (<https://goo.gl/Ob6nmY>).
  - ii. If the name of the site has changed, an updated SLA will need to be processed and the previous SLA canceled.
  - iii. If the organization has multiple sites, an amendment to the original SLA will need to be processed to add the additional sites. Contact Contract & Procurement Management to start the amendment process (<https://goo.gl/Ob6nmY>).
- c. Those educational factors identified in previous internship site reviews / annual reviews with the site remain in effect.
- d. That no new risk factors have been identified.
  - i. If new risk factors are identified, determine if additional action is warranted such as an on-site review, cancellation of the current Service Learning Agreement, and/or the need to update related items such as educational factors.
  - ii. Any new risk factors and related actions should be documented and held on file with the academic area for future reference.