Academic Senate

AGENDA

April 30, 2020
Via Zoom

3:00 – 5:00pm

Report of the Chair of the Faculty – L. A. Watt
Approval of Agenda
Approval of Minutes

Consent Items:


Business


2. From FSAC: Policy revision: RTP policy - G. Levels and Sequence of RTP Review #2 and #3 – First Reading – P. Lane TC 3:35

3. From EPC: Internship Policy – First Reading – J. Lillig TC 3:50

Standing Reports

1. President of the University - (J. Sakaki)
2. Provost/Vice-President, Academic Affairs - (L. Vollendorf)
3. Vice Chair of the Senate - (M. Milligan)
4. Vice President/Admin & Finance - (J. Lopes)
5. Vice President for Student Affairs – (W. G. Sawyer)
6. Vice-President of Associated Students – (M. Kadar)
7. Statewide Senators - (C. Nelson, W. Ostroff)
8. Staff Representative – (A. Sandoval)
9. Chairs, Standing Committees:
   Academic Planning, Assessment & Resources – (S. Place)
   Educational Policies – (J. Lillig)
   Faculty Standards & Affairs – (P. Lane)
   Student Affairs – (H. Smith)
10. CFA Chapter President – (E. Sims)

Occasional Reports

1. Senate Diversity Subcommittee – (K. Altaker)
2. Lecturers Report – (C. Torres)
3. Graduation Initiative Committee (GIG)

Good of the Order
Abstract


Present: Laura Watt, Melinda Milligan, Hope Ortiz, Sam Brannen, Missy Garvin, Catherine Nelson, Wendy Ostroff, Jeffrey Reeder, Joshua Glasgow, Puspa Amri, Angelo Camillo, Rajeev Virmani, Chiara Bacigalupa, Rita Premo, Carlos Torres, Sakina Bryant, Izabela Kanaana, Mary Ellen Wilkosz, Adam Zagelbaum, Kevin Fang, Amal Munayer, Cookie Garrett, Judy Sakaki, Lisa Vollendorf, Joyce Lopes, Wm. Gregory Sawyer, Melissa Kadar, Arcelia Sandoval, Sean Place, Jenn Lillig, Paula Lane, Hilary Smith, Sally Hurtado de Lopez, Erma Jean Sims

Guests: Hollis Robbins, Justin Lipp, Jerlena Griffin-Desta, Mary Wegmann, Kara Rabbit, Katie Musick, Karen Moranski, Merith Weismann, Ellen Carlton, Michelle Jolly

Approval of Agenda – Approved.

Approval of Minutes of 4/2/2020 – Approved.

Information item: Temporary Modification to University Policies 1987-4, Credit/No Credit Policy, 2009-5 Withdrawal from Courses, 2009-4 Academic Probation, Disqualification, and Progress, Due to Special Circumstances of the COVID-19 Pandemic

Chair Report – L. Watt

The Chair reported on the PBAC meeting Wednesday. The fall budget is mostly unknown at this point. Fall instruction is also unknown, in terms of whether we’ll be able to return to face-to-face or need to stay with remote instruction by then. She and Vice Chair will meet with the Faculty Center tomorrow to explore options for expanded training for people who might want to prep over summer for possibly staying on-line.
In regards to the info item, Michelle Jolly will be joining in around 4:15 for business item #3, and she can also answer any questions people might have about the info item. She and the Vice Chair met last Friday with chair-elect Jeffrey Reeder and vice-chair-elect Laura Krier to help them prep for their service next academic year.

President Report – J. Sakaki

J. Sakaki reported she talks daily to the Chancellor and other CSU Presidents on the phone. The recent conversations centered around the CARES money from the Federal Government that is allocated to universities. She noted the money has not been received yet but will be allocated by a formula to each CSU campus. She expected SSU’s allocation to approximately 9 million dollars. Half of that figure is designated for financial aid for students affected by the pandemic. She discussed the National Guard setting up beds on campus to support the pandemic needs. A member asked what the other half of the CARES money will be allocated to on the campus. J. Sakaki responded that this will be the next conversation among the Presidents as they seek to understand the framework for the money as the first priority is to the students. J. Lopes offered that the campus may not see a budget until September or October. The campus needs to prepare for reductions. There is a lot to work through as the pandemic unfolds.

Provost Report – L. Vollendorf

L. Vollendorf reported on current searches in Academic Affairs. She announced the Dean of SEIE has agreed to serve until next year, and that search for his replacement will continue in the summer, pending how things shape up with COVID. She discussed the current thinking about planning for the Fall semester and potentially having to continue remote learning. She appreciated the hard work of faculty center directors across the CSU helping our curriculums be taught remotely and helping faculty adapt. A member asked whether faculty may have more work over summer to prepare more for online learning. The Provost responded that she was aware of one institute focusing on this topic at the Chancellor’s Office and she believes regional opportunities for training and assistance will be coming online. She understood the need to support faculty during this fluid time and recognized the disparity among faculty as some have expertise in online learning and some do not. As she knows more, she will share it. The member voiced concern about doing student assessment in the online environment, particularly in regards to cheating. A member asked if faculty will receive pay for training over the summer. The Provost said there was no requirement for faculty to do this training. As this discussion continues, compensation will be part of the process of balancing priorities.

Vice Chair Report – M. Milligan

M. Milligan reported that S&F finished all appointments to search committees. S&F has decided not to move forward with revisions to the Constitution and By-Laws this year. They will write up the recommendations and send that to next year’s committee due to all the uncertainty.
Vice President of Administration and Finance Report – J. Lopes

J. Lopes reported that the campus may receive some budget information in May, but will probably not get a budget until September or October. There will be another meeting of campus CFO’s in May. She reported on construction projects. She said the Stevenson Hall remodel is going forward, but they are still working out how the surge will be accomplished. She said she would keep the campus updated on the activities of the County on campus with patients coming to SSU. A member asked if student tuition will increase. J. Lopes said it was too early to know. A member voiced concern about how moving out of Stevenson and how social distancing will work in the library spaces for faculty. J. Lopes said the campus will have to take a hard look at this and have not landed on an answer yet.

Resolution that Funding Sources Share Sonoma State University’s Inclusive Values – Second Reading – E. Carlton

E. Carlton reminded the members of the purpose of the resolution. A member, while supporting the resolution, suggested that the campus could receive money from foundations that don’t support our inclusive values, but put that money towards things/ causes that do support our values. A guest asked at what point in development work would these sorts of questions come up. E. Carlton said the resolution was aspirational and could not contain every situation. It is just asking the campus to be more conscious and be consistent with values. A member noted that at the first reading, it was noted that the resolution was not asking for investigations. E. Carlton argued against adding “known actor” to the resolution due to concerns about people using “I didn’t know” when they accept money from sources that do not align with our inclusive values – how would that be dealt with?

Motion to amend: add knowingly to Second Resolved Clause: Sonoma State University demonstrate its support of our LBGTQ+ community by not knowingly accepting funding from individuals, businesses and foundations that have a history of donating to anti-LGBTQ+ organizations. Second.

Vote on Motion to amend: Approved.

E. Carlton asked what would happen if, for example, someone in Athletics took money from Chik-Fil-A and said they didn’t know about their anti-LGBT funding. The Provost reminded the members that a resolution was a recommendation. Anything about fundraising policy would come from another part of the institution and it might not be productive for the Senate to image different scenarios. She thought the strongest statement the Senate wanted to make was more appropriate.

Vote on Resolution – Yes = 20, No = 0 – Approved.

Resolution that Funding Sources Share Sonoma State University’s Inclusive Values

RESOLVED: Sonoma State University limit soliciting and receiving donations to individuals, businesses and foundations that share our values of diversity and inclusion.
RESOLVED: Sonoma State University demonstrate its support of our LBGTQ+ community by not knowingly accepting funding from individuals, businesses and foundations that have a history of donating to anti-LGBTQ+ organizations.

RESOLVED: Sonoma State University demonstrates its support of our LBGTQ+ community by not accepting funding from Chick-Fil-A and its Foundation.

Vice President for Student Affairs Report – Wm. Gregory Sawyer

Wm. G. Sawyer reported that both the Student Health Center and CAPS have seen over 100 students last week, via teleconference. 1822 students have filled out their intention to return to the residence halls in the fall. This is assuming we come back to campus in the fall. He discussed the recognitions being planned for affinity groups of students. This will not replace graduation, but will help the students. A member asked the VP to put into context the 100 students seen by the Health Center and CAPS. Wm. G. Sawyer responded that it was about the same number they usually see, but without a waiting list. He said the CARE team saw 459 cases compared to last year’s total of about 200 cases.

Associated Students Report – M. Kadar

M. Kadar reported on the tie in the AS election. The AS is working on their budget and the food pantry is seeing about 20 students a day.

Statewide Senators Report – C. Nelson

C. Nelson reported on temporary suspensions of curricular policies in the Chancellor’s Office for this Spring to hold students as harmless as possible during this pandemic. The system is waiting for the Governor’s office to waive the regulations for the eligibility index for Fall 2021 admissions. She explained how the current eligibility index is set. The change proposed is just to use GPA, A-G and use supplemental criteria. The Chancellor’s Office is on telecommuting until mid-May. At the Board of Trustees meeting, she was expecting the addition of an ethnic studies requirement in Title V as a first reading. The CSU is being asked to project a 2% or 5% budget cut and send that to the finance office.

Staff Representative Report – A. Sandoval

A. Sandoval reported that the Staff Council is now meeting on Tuesdays and is meeting on Zoom. The Staff Council website has all the information. The meetings help staff stay informed about the shelter-in-place and the pandemic.

Resolution Regarding Evaluation of Teaching Performance and RTP Review During the COVID-19 Emergency – Second Reading – L. Watt

L. Watt noted that at the first reading it was suggested to add AVP Roberts to the distribution list and a Senator suggested that a word change happen in one of the resolved clauses.
Motion to add: AVP Roberts to distribution list and to change: An individual faculty member’s decision to add request an additional year to their time to tenure because of the COVID-19 pandemic. . . Second. Approved.

Point of order – voting needs to allow abstentions, so the Chair cannot just ask for No votes and just proceed to assume all the rest are Yes votes.

A member asked if the resolution has a timeline. L. Watt responded that the resolution addresses Spring 2020 only.

Vote on amended resolution – Yes = 24, No = 0. Approved.

Resolution Regarding Evaluation of Teaching Performance and RTP Review During the COVID-19 Emergency

RESOLVED: That the Sonoma State University (SSU) Academic Senate urge the SSU Administration to allow the following actions due to the COVID-19 emergency:

• Inclusion of Spring 2020 Student Evaluation of Teaching Effectiveness (SETE) at the sole discretion of the faculty under review;

• No faculty be penalized in any way for exercising their right to exclude the results of their surveys of student evaluations of teaching from their PAF during this period;

• Should a faculty member be unable to complete any previously scheduled peer observations, or should they choose not to participate in the peer observation via an online format, no faculty member shall be penalized for failure to include the appropriate number of peer observations during the Spring semester.

• RTP reviews of probationary faculty impacted by the COVID-19 crisis be conducted with sensitivity to the difficulties those faculty experienced during the crisis and with as much flexibility as is possible;

• Presidential authorization of a deviation in the normal six (6) year probationary period to allow for an optional seventh (7) probationary year for all probationary faculty with a start date before August 2020;

• An individual faculty member’s decision to request an additional year to their time to tenure because of the COVID-19 pandemic should result in no negative effect to their eventual tenure review;

and be it further

RESOLVED: That the SSU Academic Senate urge that a copy of this resolution be placed in every faculty member’s Personnel Action File (PAF) to provide the context for
understanding the circumstances surrounding the periods including Spring 2020, Summer 2020, and potentially Fall 2020, and their potential impact on RTP processes and outcomes; and be it further

RESOLVED: That this resolution be distributed to President Sakaki, Provost Vollendorf, AVP Moranski, AVP Roberts, the School Deans, Department Chairs, Program Directors, RTP Chairs, CFA Sonoma State Chapter President Erma Jean Sims, ASCSU Chair Catherine Nelson, and CFA President Charles Toombs.

From University Standards and EPC: Revision to Withdrawal Policy – First Reading – M. Jolly

M. Jolly introduced the item by noting that University Standards had been wanting to revise this policy for some time and now the current circumstances demand that this be done. The policy has incorrect language. The most significant change is to the Total Withdrawal section. There was some clean up language and she added a chart to help advisors, students and faculty understand the process. She noted that a technological process will help students receive the correct form for withdrawals. First reading completed.

The Chair noted that M. Jolly could address any questions about the information item. M. Jolly noted that the new EO orders from the Chancellor’s Office will be incorporated into these temporary measures.

APARC Report – S. Place

S. Place reported that APARC continues to work on priority recommendations. They will hold off on the classroom conditions survey given the current disruptions. This will allow them to add some questions about classroom layout.

EPC Report – J. Lillig

J. Lillig reported that EPC passed the Internship policy. She was pleased that this was completed since it started in 2010. She said all the FAQ and feedback will be sent forward with the policy. They finished the content area criteria for lower and upper division D. The Overlays are next. EPC spent a lot of time talking about online teaching in the fall. They are working on policy type language to help faculty navigate the new situation. The new Chair of EPC will be Emily Ascencio. A member asked if the new policies will allow faculty to continue to teach online when the shelter-in-place lifts. J. Lillig said this was under discussion.

FSAC Report – P. Lane

P. Lane reported that FSAC will bring forward a single change to the RTP policy without opening up the whole policy. This is concerning FERP faculty on RTP committees. The full revision to the policy will come forward in the Fall. She reported on her research to incentivize SETE responses. On Canvas there will be a big banner about SETE responses and in the fall, students will receive all the links to all their courses in one email instead of an email for each course. She noted she brought a document about teaching sensitive materials to the Ex Com, but they
decided it was not ready and offered to give feedback to AFS and PDS to clarify the document. She noted she was re-elected as Chair of FSAC and was looking into the possibility of co-chairing with Mary Wegmann. A member asked if FSAC was considering updating the actual SETE questions. P. Lane responded that the SETE questions do need to be changed, since they have not changed since they were first developed. She is thinking about setting up a subcommittee to do this work after the disruptions have calmed down. The member thanked the committee for taking on that work and argued that updating these questions was a high priority even in this time of disruption.

SAC Report – H. Smith

H. Smith reported that the Priority Registration subcommittee is reviewing the latest application for priority registration. She has been working with the basic needs initiative about granting emergency relief to students. At the next meeting, they will elect next year’s Chair.

CFA Report – E. J. Sims

E. J. Sims reported on CFA’s advocacy on the temporary administrative leave policy. This policy change helped include non-benefits faculty. CFA also helped extend the timeline to 256 days. She noted CFA had a very successful virtual happy hour. The next one will be on May 7th at 5:30 and all attendees that register ahead of time will be mailed a cocktail care package. She noted the CFA President is sending out CFA and Covid-19 updates weekly. CFA will monitor the allocation and transparency of the CARES Act dollars that will be used on the CSU campuses. All CFA contract obligations are still in full effect during the pandemic. A member asked whether CFA was freezing negotiations for salary increases. E. J. Sims said she has not heard anything along that line yet.

Adjourned.

Minutes prepared by L. Holmstrom-Keyes and reviewed by Senate Secretary
Revision of the SSU Policy on Withdrawal from Courses
Spring 2020

Rationale:
The university Policy on Withdrawal from Courses was created in 2009 in response to CSU Executive Order 1037, which encouraged campuses to tighten restrictions on withdrawing from courses. Tight budget times combined with high enrollments meant that campuses were encouraged to establish administrative barriers to discourage students from withdrawing from courses after the drop deadline. Although the E.O. is still in force, the campus context has changed. Our emphasis is more on reducing administrative barriers where possible and supporting student success. University Standards is revising several policies with this in mind.

However, University Standards Committee has been motivated to revise the withdrawal policy at this moment for three reasons:

1. Most urgently, the language in the section on Total Withdrawal is incorrect and, as it turns out, has been incorrect since the last policy revision. Students wishing to withdraw from the university (or drop all their courses during a semester) do NOT follow the same procedure as students withdrawing from a single course. Instead of filing a petition, acquiring 4 signatures, and paying a fee for each individual course, students fill out one form. This form requires no fees, no signatures from instructors or departments, and is routed to housing, financial aid, and international student affairs as appropriate. This language needs to be corrected, particularly as some students will be wanting to withdraw completely in response to the coronavirus upset.

2. Also in response to our move to remote teaching, the committee realized that there was some language (now in section II.A.3.b) that needed to be amended to include class participation online.

3. Finally, since we were revising the policy, the committee has retitled and renumbered some sections and added some clarifying language to make the policy more useful to students and advisors. We have also created a chart to help users navigate the procedures. We are working with the registrar’s office to create an online form that will be piloted in Spring 2020.

With this cover sheet, we have included four documents:

- The existing Withdrawal from Courses policy
- An Edited Withdrawal from Courses policy showing the changes and the rationales for them.
- A Clean Copy of the Edited policy
- A draft of the chart we are developing with the Registrar's Office and Advising to help students and advisors navigate the procedures to use when withdrawing from classes.

We hope to move this policy through governance this semester so that the correct will be available to students, parents, and advisors.
Withdrawal from Courses

Recommended By: Academic Senate
Approved: Ruben Armiñana, President
Issue Date: Monday, June 1, 2009
Current Issue Date: Monday, June 1, 2009
Effective Date: Saturday, August 1, 2009
Contact Office: Office of the Registrar
Policy number: 2009-5

In accordance with CSU Executive Order No. 1037, it is the policy of Sonoma State University that:

I. Unit Limit for Withdrawal from Courses:
Undergraduate students may withdraw from no more than 18 total semester units of coursework attempted at Sonoma State University. Withdrawals for “serious and compelling” reasons, which are documented and approved according to the procedures below, will not count toward the maximum of 18 semester units.

II. Definitions of “Serious and Compelling” and “Appropriate Documentation”:
A. For the purposes of withdrawal, the University defines “serious and compelling reasons” as follows:

1. The standard of “serious and compelling” applies to situations, such as illness or accident, clearly beyond the student’s control. All situations require documentation.

2. The following situations are typical of those for which “serious and compelling” is appropriate justification for withdrawal:

   a. An extended absence due to verifiable accident, illness, or personal problem serious enough to cause withdrawal from the university;
   b. An extended absence due to a death in the immediate family;
   c. A necessary change in employment status that interferes with the student’s ability to attend class;
   d. Errors made by SSU;
   e. Other unusual or very special cases will be considered on their merit by the University Standards Committee.
3. The following situations DO NOT fall under the intent of “serious and compelling”:
   a. Grade anticipated in class is not sufficiently high, or student is doing failing work (including situations where the student has been penalized with a failing grade for academic dishonesty);
   b. Failure to attend class in person and/or participate online when appropriate, complete assignments, or take a test;
   c. Dissatisfaction with the course material, instructional method, or instructor;
   d. Class is harder than expected;
   e. Pressure of other classes, employment, and/or participation in extracurricular activities;
   f. A change of major;
   g. Lack of awareness of the withdrawal process or procedures.

4. This standard shall be available to students, faculty, and administrators online and on the Petition to Withdraw from a Course Form.

B. All petitions for withdrawal after the census date must be accompanied by appropriate documentation of the “serious and compelling” reasons for withdrawal. Documentation may include:
   1. Verification of accident or illness (such as a letter on letterhead from the treating physician or licensed counselor, or copies of medical bills);
   2. Death certificate;
   3. Employer verification of change of work status;
   4. PeopleSoft records;
   5. Other like documentation as appropriate.

III. Dropping or Withdrawing from one or more – but not all – courses during the current semester

A. Dropping a Course:
   1. Students may drop a course (or courses) online and without penalty until the drop deadline (check Academic Calendar).
   2. A course dropped before the drop deadline will not appear on the student’s transcript.

B. Withdrawing from a course or courses after the drop deadline:
   1. When a student withdraws from a course or courses after the drop deadline, these courses will remain on the student’s transcript and be
marked with a non-punitive grade of “W” (a “W” does not count toward the student’s GPA).

2. From the drop deadline through the “last day to Drop with W” (check Academic Calendar),
   a. During this period, students without “serious and compelling” reasons may withdraw from a course (or courses) through PeopleSoft.
   b. Withdrawing from a course (or courses) for reasons that are not “serious and compelling” will count toward the 18-unit maximum.
   c. Students withdrawing from a course or courses for “serious and compelling” reasons should file a Petition to Withdraw, accompanied by documentation and appropriate signatures, instead of withdrawing through PeopleSoft.
   d. Students may withdraw from the university (or withdraw from ALL current courses) for any reason during this period by filing a Petition to Withdraw.

3. From the “last day to Drop with W” and prior to the last 20% of instruction (check Academic Calendar),
   a. Students must have documented “serious and compelling” reasons in order to withdraw from a course, multiple courses, or all courses.
   b. During this period, students must obtain the signatures of the course instructor and the student’s faculty advisor (or professional academic advisor if the student is undeclared).
   c. Such withdrawals will not count against the maximum number of units in Section I above.

4. During the last 20% of instruction (see Academic Calendar),
   a. Students must have documented “serious and compelling” reasons clearly beyond the student’s control in order to withdraw from a course, multiple courses, or all courses.
   b. While in many cases withdrawing from a course may be the best option, students may wish to consult with the course instructor about whether an incomplete is practicable.
   c. Procedures are the same as for Section B above. However, for this period, the registrar has the final authority to approve or disapprove the petition.
   d. Such withdrawals will not count against the maximum number of units in Section I above.
IV. **Total Withdrawal (Withdrawing from all courses and from the university)**

A. During the period between the Drop Deadline and the “last day to withdraw with a W online,”
   1. A student wishing to completely withdraw from the semester (drop all courses) must complete the online Petition to Withdraw.
   2. During this period, a student may withdraw completely for any reason.
   3. However, if the student has documented “serious and compelling” reasons for withdrawing, the units will not count toward the maximum number of units in Section I above.

B. During the period from the census date to the end of instruction,
   1. A student wishing to completely withdraw from the semester may do so ONLY for “serious and compelling reasons,” which must be documented, using the online Petition to Withdraw.
   2. Such withdrawals will not count against the maximum number of units in Section I above.

V. **Retroactive Withdrawal (after a semester has ended)**

A. After a given semester has ended, students may petition to retroactively withdraw from an entire semester if there are “serious and compelling” reasons for such a withdrawal.
B. Students may withdraw from a single course retroactively if and only if there are “serious and compelling” reasons affecting a single course (such as being unable to finish a PE course due to a broken leg).
C. The student must file the online Withdrawal form, which must be accompanied by documentation of the “serious and compelling” reasons.
D. The petition must be supported by the student’s faculty advisor or by a professional academic advisor if the student is undeclared.
E. The University Standards Committee has the final authority approve or deny such petitions.
F. Retroactive withdrawals for “serious and compelling” reasons will not count against the maximum number of units in Section II, A above.
Withdrawal from Courses

Recommended By: Academic Senate
Approved: Judy Sakaki, President
Issue Date: Monday, June 1, 2009
Current Issue Date:
Effective Date:
Contact Office: Office of the Registrar
Policy number: 2009-5

In accordance with CSU Executive Order No. 1037, it is the policy of Sonoma State University that:

I. Unit Limit for Withdrawal from Courses:
Undergraduate students may withdraw from no more than 18 total semester units of coursework attempted at Sonoma State University. Withdrawals for “serious and compelling” reasons, which are documented and approved according to the procedures below, will not count toward the maximum of 18 semester units.

II. Definitions of “Serious and Compelling” and “Appropriate Documentation”:
A. For the purposes of withdrawal, the University defines “serious and compelling reasons” as follows:

   1. The standard of “serious and compelling” applies to situations, such as illness or accident, clearly beyond the student’s control. All situations require documentation.

   2. The following situations are typical of those for which “serious and compelling” is appropriate justification for withdrawal:

      a. An extended absence due to verifiable accident, illness, or personal problem serious enough to cause withdrawal from the university;
      b. An extended absence due to a death in the immediate family;
      c. A necessary change in employment status that interferes with the student’s ability to attend class;
      d. Errors made by SSU;
      e. Other unusual or very special cases will be considered on their merit by the University Standards Committee.
3. The following situations DO NOT fall under the intent of “serious and compelling”:

a. Grade anticipated in class is not sufficiently high, or student is doing failing work (including situations where the student has been penalized with a failing grade for academic dishonesty);
b. Failure to attend class in person and/or participate online when appropriate, complete assignments, or take a test;
c. Dissatisfaction with the course material, instructional method, or instructor;
d. Class is harder than expected;
e. Pressure of other classes, employment, and/or participation in extracurricular activities;
f. A change of major;
g. Lack of awareness of the withdrawal process or procedures.

B. All petitions for withdrawal after the census date must be accompanied by appropriate documentation of the “serious and compelling” reasons for withdrawal. Documentation may include:

1. Verification of accident or illness (such as a letter on letterhead from the treating physician or licensed counselor, or copies of medical bills);
2. Death certificate;
3. Employer verification of change of work status;
4. PeopleSoft records;
5. Other like documentation as appropriate.

III. Dropping or Withdrawing from one or more – but not all – courses during the current semester

A. Dropping a Course:
1. Students may drop a course (or courses) online and without penalty until the drop deadline (check Academic Calendar).

2. A course dropped before the drop deadline will not appear on the student’s transcript.

B. Withdrawing from a course or courses after the drop deadline:

1. When a student withdraws from a course or courses after the drop deadline, these courses will remain on the student’s transcript and be marked with a non-punitive grade of “W” (a “W” does not count toward the student’s GPA).
2. From the drop deadline through the “last day to Drop with W” (check Academic Calendar),
   a. During this period, students without “serious and compelling” reasons may withdraw from a course (or courses) through PeopleSoft.
   b. Withdrawing from a course (or courses) for reasons that are not “serious and compelling” will count toward the 18-unit maximum.
   c. Students withdrawing from a course or courses for “serious and compelling” reasons should file a Petition to Withdraw, accompanied by documentation and appropriate signatures, instead of withdrawing through PeopleSoft.
   d. Students may withdraw from the university (or withdraw from ALL current courses) for any reason during this period by filing an online Petition to Withdraw.

3. From the “last day to Drop with W” and prior to the last 20% of instruction (check Academic Calendar),
   a. Students must have documented “serious and compelling” reasons in order to withdraw from a course, multiple courses, or all courses.
   b. During this period, students must obtain the signatures of the course instructor and the student’s faculty advisor (or professional academic advisor if the student is undeclared).
   c. Such withdrawals will not count against the maximum number of units in Section I above.

4. During the last 20% of instruction (see Academic Calendar),
   a. Students must have documented “serious and compelling” reasons clearly beyond the student’s control in order to withdraw from a course, multiple courses, or all courses.
   b. While in many cases withdrawing from a course may be the best option, students may wish to consult with the course instructor about whether an incomplete is practicable.
   c. Procedures are the same as for Section B above. However, for this period, the registrar has the final authority to approve or disapprove the petition.
   d. Such withdrawals will not count against the maximum number of units in Section I above.
IV. Total Withdrawal (Withdrawing from all courses and from the university)

A. During the period between the Drop Deadline and the “last day to withdraw with a W online,”

   1. A student wishing to completely withdraw from the semester (drop all courses) must complete the online Petition to Withdraw Form.

   2. During this period, a student may withdraw completely for any reason.

   3. However, if the student has documented “serious and compelling” reasons for withdrawing, the units will not count toward the maximum number of units in Section I above.

B. During the period from the census date to the end of instruction,

   1. A student wishing to completely withdraw from the semester may do so ONLY for “serious and compelling reasons,” which must be documented, using the online Petition to Withdraw form.

   2. Such withdrawals will not count against the maximum number of units in Section I above.

V. Retroactive Withdrawal (after a semester has ended)

A. After a given semester has ended, students may petition to retroactively withdraw from an entire semester if there are “serious and compelling” reasons for such a withdrawal.

B. Students may withdraw from a single course retroactively if and only if there are “serious and compelling” reasons affecting a single course (such as being unable to finish a PE course due to a broken leg).

C. The student must file the online Withdrawal form, which must be accompanied by documentation of the “serious and compelling” reasons.

D. The petition must be supported by the student’s faculty advisor or by a professional academic advisor if the student is undeclared.

E. The University Standards Committee has the final authority to approve or deny such petitions.

F. Retroactive withdrawals for “serious and compelling” reasons will not count against the maximum number of units in Section II, A above.
In accordance with CSU Executive Order No. 1037, it is the policy of Sonoma State University that:

I. Dropping a Course:
   Students may drop a course (or courses) online and without penalty until the drop deadline (check Academic Calendar)

II. Withdrawal from a Course or Courses after the drop deadline:
   A. Unit Limit for Withdrawal from Courses: Undergraduate students may withdraw from no more than 18 total semester units of coursework attempted at Sonoma State University. Withdrawals for “serious and compelling” reasons, which are documented and approved according to the procedures below, will not count toward the maximum of 18 semester units.
   B. Definition of Serious and Compelling: For the purposes of withdrawal, the University defines “serious and compelling reasons” as follows:
      1. The standard of “serious and compelling” applies to situations, such as illness or accident, clearly beyond the student’s control. All situations require documentation.
      2. The following situations are typical of those for which “serious and compelling” is appropriate justification for withdrawal:
         a. An extended absence due to verifiable accident, illness, or personal problem serious enough to cause withdrawal from the university;
         b. An extended absence due to a death in the immediate family;
         c. A necessary change in employment status that interferes with the student’s ability to attend class;
         d. Errors made by SSU;
         e. Other unusual or very special cases will be considered on their merit by the University Standards Committee.
      3. The following situations DO NOT fall under the intent of “serious and compelling”:
         a. Grade anticipated in class is not sufficiently high, or student is doing failing work (including situations where the student has been penalized with a failing grade for academic dishonesty);
         b. Failure to attend class, complete assignments, or take a test;
         c. Dissatisfaction with the course material, instructional method, or instructor;
         d. Class is harder than expected;
e. Pressure of other classes, employment, and/or participation in extracurricular activities;
f. A change of major; g) Lack of awareness of the withdrawal process or procedures.

4. This standard shall be available to students, faculty, and administrators online and on the Petition to Withdraw from a Course form.

C. From the drop deadline through the “last day to Drop with W” (check Academic Calendar),
   1. Students may withdraw from a course (or courses) online for any reason.
   2. Students who withdraw during this period shall receive a non-punitive grade of “W”.
   3. Withdrawing from a course (or courses) for reasons that are not “serious and compelling” will count toward the 18-unit maximum.
   4. Students withdrawing from a course or courses for “serious and compelling” reasons should file a Petition to Withdraw, accompanied by documentation, rather than withdrawing online.
   5. Students withdrawing from all courses should see Section III below (Total Withdrawal).

D. After the “last day to Drop with W” and prior to the last 20% of instruction (check Academic Calendar), students may withdraw with a “W” from a course (or courses) ONLY for “serious and compelling” reasons, which must be documented. Students must pay a fee and file a petition (available at Admissions & Records) for each course, stating their reasons for withdrawal and providing documentation, which must accompany the petition. Students must obtain the signatures of the course instructor and the chair of the department in which the course is taught for the petition to be approved. Such withdrawals will not count against the maximum number of units in Section II, A above.

E. During the last 20% of instruction (see Academic Calendar), students may withdraw with a “W” from a course (or courses) ONLY for documented “serious and compelling reasons” clearly beyond the student’s control. Procedures are the same as for Section D above. However, for this period, the registrar has the final authority to approve or disapprove the petition. Such withdrawals will not count against the maximum number of units in Section II, A above. Note: While in many cases withdrawing from a course may be the best option, students may wish to consult with the course instructor about whether the amount of work remaining to be completed and the nature of the “serious and compelling reasons” would make an incomplete practicable.

III. Total Withdrawal
   A. During the period between the Drop Deadline and the “last day to withdraw with a W online,” a student wishing to completely withdraw from the semester (drop all courses) must complete a Withdrawal Form for each course. If the student’s reasons for dropping are “serious and compelling,” the reasons must be documented and approved. If “serious and compelling” reasons for withdrawing are documented and approved, the units will not count toward the maximum number of units in Section II, A above.

   B. During the period from the census date to the end of instruction, students wishing to completely withdraw from the semester may do so ONLY for “serious and compelling reasons,” which must be documented. As in Section II, D and E above, students must pay a fee and file a petition for each course, stating their
reasons for withdrawal and providing documentation. Students must obtain the signatures of each course instructor and the chair of the department in which each course is taught for the petition to be approved. If the petition is filed during the last 20% of instruction, the Registrar has the final authority to approve or disapprove the petition. Such withdrawals will not count against the maximum number of units in Section II, A above.

IV. Retroactive Withdrawal
After a given semester has ended, students may petition to retroactively withdraw from an entire semester if there are “serious and compelling” reasons for such a withdrawal. The student must file a petition, which must be accompanied by documentation of the “serious and compelling” reasons. The petition must also be supported by the student’s department advisor or by an academic advisor if the student is undeclared. The Registrar and the University Standards Committee have the final authority approve or deny such petitions. Students may withdraw from a single course retroactively if and only if there are “serious and compelling” reasons affecting a single course (such as being unable to finish a PE course due to a broken leg). Retroactive withdrawals for “serious and compelling” reasons will not count against the maximum number of units in Section II, A above.

V. Documentation
All petitions for withdrawal after census date must be accompanied by documentation of the “serious and compelling” reasons for withdrawal. Documentation may include: verification of accident or illness (such as a letter from the treating physician or copies of medical bills); a letter from a licensed counselor; death certificate; employer verification of change of work status; PeopleSoft records; and other like documentation as appropriate.

Updated by SSU.policies@sonoma.edu
| From the start of the semester to the Drop Deadline (end of week 2 -- see Academic calendar) | • Drop a class using Peoplesoft; no form, signatures, or fees required  
• Course will no longer show on transcript  
• For any reason; "serious & compelling" not required  
• Does not count toward the 18 maximum units of withdrawal |
|---|---|
| From the Drop Deadline to the Census date (end of week 4 -- see Academic calendar) | • Withdraw from one or more classes using Peoplesoft; no form, signatures, or fees required unless “serious & compelling” reasons  
• Course will appear on transcript with a "W" which does not count in the student's GPA  
• For any reason; "serious & compelling" not required  
• Counts toward 18 maximum units of withdrawal UNLESS "serious & compelling" reasons are cited and documented |
| From the Census date to the last 20% of instruction (end of week 12 -- see Academic calendar) | • Withdraw from one or more classes using Withdrawal Form (see Registrar's Office forms); signatures and fees required  
• Course will appear on transcript with a "W" which does not count in the student's GPA  
• "Serious & Compelling" reasons required -- see definition. Must be documented.  
• Does not count toward 18-unit maximum units of withdrawal. |
| Last 20% of instruction (end of week 12 until last day of instruction -- see Academic calendar) | • Withdraw from one or more classes using Withdrawal Form (see Registrar's Office forms); signatures and fees required  
• Student and instructor should determine if an incomplete would be appropriate.  
• Course will appear on transcript with a "W" which does not count in the student's GPA  
• "Serious & Compelling" reasons required -- see definition. Must be documented.  
• Does not count toward 18-unit maximum units of withdrawal. |
| Total withdrawal from all classes during the current semester (after the Drop Deadline) or from the University if not enrolled | • Withdraw from all classes using the Withdrawal Form. Some signatures required, no fee.  
• Course will appear on transcript with a "W" which does not count in the student's GPA  
• "Serious & Compelling" reasons required -- see definition. Must be documented.  
• Does not count toward 18-unit maximum units of withdrawal. |
| Retroactive Withdrawal from all classes during finals week or after a semester ends | • Withdraw from all classes in the semester (unless serious & compelling reasons apply narrowly to a specific course). Signatures and advisor support required. No fee.  
• Course will appear on transcript with a "W" which does not count in the student's GPA  
• "Serious & Compelling" reasons required -- see definition. Must be documented.  
• Does not count toward 18-unit maximum units of withdrawal. |
April 20, 2020

Policy Revision: University Reappointment, Tenure, and Promotion Procedures, Criteria, and Standards for Tenured and Probationary Faculty

Faculty Standards and Affairs Committee (FSAC) is bringing the attached document forward for approval by the Senate in order to correct a minor problem between the language in the Collective Bargaining Agreement (CBA), and that of the University Reappointment, Tenure, and Promotion Policy (URTP).

In the fall of 2019, a problem was discovered that had heretofore not been addressed regarding eligibility of FERP (Faculty Early Retirement Program) faculty serving on RTP committees. Though perhaps not realized prior to the fall of 2019, and common practice until that time, allowing FERP faculty to serve on RTP committees was rejected by the office of Faculty Affairs. Schools were notified that no FERP faculty could serve on RTP committees. Because of incongruities in language between the URTP Policy and the CBA the office of Faculty Affairs could not allow and send forward for approval to the President, the names of any FERP Faculty as members of any department or school RTP Committee. The requests by several schools to allow FERP faculty to serve on either department or school RTP committees was denied. Considered completely unintentional, the problem is easily addressed with small changes in language to the URTP Policy.

At the center of the issue is the specific language in the URTP Policy stating that to be eligible to serve on RTP Committees, a faculty member must be fulltime. FERP faculty are by definition, not fulltime.

The experience that FERP faculty provide on RTP Committees cannot be stated strongly enough as their participation, or lack thereof, affect workload, sharing of content knowledge, teaching and research experience, insight with institutional memory, skill as writers of the evaluation genre, and sensibilities that can only support and strengthen the process of evaluation of peers. This high stakes process should have as much expertise as possible for the reasons mentioned above.

There are several ways in which the language might be changed in the subordinate URTP Policy resulting in no lack of parity with the CBA—it is a problem that can be easily be remedied by removing the word “fulltime” in two places in the URTP Policy.

From the URTP Policy:

G. Levels and Sequence of RTP Review
#2. b. Committee Membership and Eligibility. To be eligible, a faculty member must be full-time and tenured, and must hold a rank equal to or above the rank to which advancement of the candidate is being considered. If a Department has fewer than three eligible faculty members, the Committee shall be composed of eligible faculty members within the Department, augmented by tenured faculty members of appropriate rank from related disciplines. The Department Chair, if tenured, may, at the discretion of the Department, be a member of the Department RTP Committee. Committee membership shall be for at least one year, contingent on an eligible faculty’s availability for the entire year.

#3. a. Committee Membership and Eligibility. Members of the School RTP Committee shall be full-time and tenured, and shall hold a rank equal to or above the rank to which advancement of the candidate is being considered. Members of the School Committee shall be elected by tenured and probationary faculty from their School according to each School's election procedures, with a minimum of three members serving staggered two-year terms.

From the CBA:

Under Article 15 Evaluation, Provision 15.2 the verbiage is;

15.2 Faculty unit employees, students, academic administrators, and the President may contribute information to the evaluation of a faculty unit employee. Information submitted by the faculty unit employee and by academic administrators may include statements and opinions about the qualifications and work of the employee provided by other persons identified by name. Only tenured faculty unit employees and academic administrators may engage in deliberations and make recommendations to the President regarding the evaluation of a faculty unit employee. At the request of a department, the President may agree that a faculty unit employee participating in the Faculty Early Retirement Program may also engage in deliberations and make recommendations regarding the evaluation of a faculty unit employee. However, faculty committees established for this purpose may not be comprised solely of faculty participating in the Faculty Early Retirement Program.
To: Members of the SSU Academic Senate

From: Jennifer Lillig, EPC Chair

Re: SSU Internship Policy

April 20, 2020

EPC unanimously recommends this SSU Internship Policy for consideration by the Academic Senate. The need for an internship policy began in 2011 as a result of an Executive Order (EO 1064: https://www.csun.edu/sites/default/files/Student-Internships-Executive-Order-1064.pdf).

Since that time, the draft policy underwent multiple revisions, the most recent of which during academic year 2018-2019. This led to a brand new simplified draft with all process language removed. This newest version began in faculty governance with a first reading on August 29, 2019 after which it was released to campus for feedback. As meeting time permitted, EPC discussed plans for how to organize and address the incoming feedback and worked with Academic Programs to consult with risk management and CSU general counsel. This led to development of two GoogleDocs of feedback (Parts 1 and 2 below) for EPC to work from for modifying the policy and addressing concerns as well as an FAQ (also below) to streamline general answers to questions. Updated policy and process documents as well as the FAQs were sent to the faculty for further feedback in mid-February and the second reading began on February 27, 2020. EPC discussed feedback over multiple meetings and months until the last discussions on April 2nd and April 16. On April 2nd, EPC felt comfortable with the final direction of the policy but took two additional weeks for clarification of language and purpose to make sure we felt we had addressed the concerns of the campus. On April 16th, we made final modifications to the policy that we felt addressed the remaining major concerns and the policy was passed unanimously.

EPC recognized a lot of concern regarding faculty liability and the safeguarding of current internships. Throughout the feedback process EPC worked to clarify these issues. First, the role of this policy is to establish the requirements for how an internship gets established at SSU. The role of this policy is not 1) decide which internships are allowed or 2) directly absolve faculty of liability. Internship sites undergo a virtual site evaluation when they register with our campus. This site evaluation (the risk management questionnaire) was developed by the Chancellor’s Office to be in-line with CSU-wide insurance requirements. These are not SSU decisions, however, it is the goal of the Center for Community Engagement (CCE) to help sites provide clarification and mitigate any problems. It is the existence of and adherence to an official SSU Internship Policy that provides protection for faculty liability. As it stands, current
SSU internships are not being assessed for risk-management and faculty are not following an SSU policy. Therefore, we are not in compliance with the executive order which means we are not protected.

In addition to review of all feedback, major curricular concerns, prior to this EPC-approved version, that were discussed in depth included:

- the 45-hour on-site requirement (per credit hour)

EPC conclusion: based on the CS # (36) for internships and the associated descriptions of faculty time spent, the 45-hour on-site requirement was appropriate for an internship and in-line with other internship policies.

- the distinctive roles of the faculty vs. CCE in internships

EPC conclusion: CCE serves as an internship facilitator to interface with Risk Management while the faculty role is to develop the curriculum of the internship. EPC worked to delineate these roles in the policy.

EPC found this new policy version to be streamlined and to meet the requirements of the executive order, thus allowing us to be covered by the CSU-wide insurance policy. We hope the members of the Academic Senate will carefully read the proposed Internship Policy, associated process documents (list below), and responses to the campus feedback we obtained (list also below) in order to facilitate the discussion at Senate.

Best Regards,
Jenn Whiles
~Your Friendly Neighborhood Virtual EPC Chair~

Included Process Documents related to this policy:
- Recommendations and Additional Information for Departmental Internship Policies
- Learning Contract
- SSU Risk Management Process
- SSU Center for Community Engagement, Types of Community Engaged Experiential Education

Supplementary Information, Campus Feedback and Responses:
- General Internship Policy and Process Questions and Discussion Items for EPC Part 1
- General Internship Policy and Process Questions and Discussion Items for EPC Part 2
• Internship Policy and Process FAQs
SSU Internship Policy

I. Background
On September 9, 2011, the California State University Office of the Chancellor issued Executive Order 1064 (EO 1064) concerning Student Internships. EO 1064 states “each campus is required to develop, implement, maintain and publish a student internship policy governing internships where the university makes the placement.”

II. Purpose
This policy establishes a policy for campus student internships and delegates responsibility for implementation to the Associate Vice President for Programs.

III. Internships and Risk Management
EO 1064 defines an internship as a formal agreement which: 
*Integrates the student’s academic study with practical experience in a cooperating organization. It is an [on campus or] off-campus activity designed to serve educational purposes by offering experience in a service learning, 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. The internship Site is the organization at which the internship takes place.*

Service-learning and the Community Involvement Program (CIP) are excluded from this policy for Sonoma State and, for the purposes of risk management, are handled through a separate insurance policy.

This policy will be applied to all academic internships at Sonoma State University. Academic internships must earn academic credit. An internship is an on-the-job experience at an on-or off-campus work setting directly related to career interests and major field of study. It is a paid or unpaid work experience that is supervised, in which students learn about the demands and requirements of a profession and industry under the direction of intentional learning goals. Salaried financial compensation for internship activities, if applicable, must be no less than minimum wage. Internships with for-profit businesses must be paid except when they meet all criteria set by the US Department of Labor, Wage and Hour Division. Internships taken for academic credit require tuition payment in the same way as any course. Enrollment of students in internship courses and internship experiences not compliant with this Internship Policy could result in university and faculty liability.
Non-credit bearing experiences are not subject to this policy, and Sonoma State’s Career Center and related programs in the Division of Student Affairs will act as facilitators for providing information on these experiences to students and alumni; however, the University will assume no responsibility for these non-credit bearing experiences. Students may pursue them on their own and they will not receive academic credit.

The Center for Community Engagement (CCE), in consultation with faculty and the Campus Risk Manager, will develop procedures, minimum requirements, and applicable form templates, consistent with existing policies and best practices, for the following internship components: internship procedures, minimum requirements, and templates and these items will be reviewed and approved by EPC on an annual basis. CCE will report to EPC on an annual basis.

A. Site Evaluation/Visit

1. A Safety Evaluation must be completed by the CCE prior to students beginning internships at a site. The Safety Evaluation will be updated every five years at the time the University-Agency Agreement is renewed.

2. A University-Agency Agreement, which includes proof of liability insurance, must be initiated by the CCE at the time the organization registers to host internships but does not have to be completed before students begin internship experiences.

3. If necessary, the CCE will conduct all virtual site visits and Sonoma County in-person site visits when required due to Safety Evaluation responses and will work with supporting faculty to address in-person site visit needs for organizations outside the County or in out-of-state or international locations. The institution will develop processes to deal with faculty concerns related to the site evaluation process.

B. Faculty Responsibilities

Faculty are responsible for developing LC with students and the internship site prior to the placement of individual students at the site. The LCs must include assessment of the appropriateness of the internship site as a placement for the individual student and should include evaluation of the potential for the internship site to provide an educationally appropriate experience that relates to the student’s academic pursuits at SSU. LCs must also include the CSU Release of Liability form signed by the student.

Faculty should verify through the LC that internships take place outside the traditional
classroom and that the practical learning component of an internship assignment shall total at least 45 hours on-site, per unit of credit, in accordance with the CSU Course Classification (CS code) of 36. A department may decide to require additional hours of the student’s time in any given internship for reflection, processing, and academic integration.

No more than 12 units of internship credit shall be among the units applied toward the Bachelor's Degree, with no more than 8 units applied in a department.

Faculty are responsible for providing oversight for internships. This responsibility includes verifying that the internship is undertaken only by students with sufficient academic background to benefit from the experiences (departments may determine policies related to minimum GPA, class status, major, etc.). This also includes designating mechanisms that guarantee oversight of the internship experience during the semester and evaluating progress on learning goals described in the LC and collecting and reviewing evaluations by the students and on-site supervisors. Faculty are responsible for sharing with the CCE any concerns they have about the educational appropriateness or safety of the site that is gathered from these evaluations. CCE will then address any concerns.

The LCs will also verify that internships will be completed during the semester in which the student is enrolled, following standard academic regulations for course enrollments (add/drops, incompletes, and course withdrawals). Academic departments may develop departmental policies that contain any additional internship criteria deemed relevant to the educational experience, including whether internships are required for a given major, the maximum number of internship credits that may be applied towards a major, and limits on repetition of internship units (see Guidelines for Departmental Internship Policies for other suggested policies).

Faculty are responsible for ensuring that if a qualified intern with a verified disability identifies the need for an accommodation. The site, in collaboration with SSU Disability Services for Students (DSS) and the faculty member, should provide an accommodation that will allow the individual equal access to perform the essential functions of the position.

Faculty and staff who develop internships shall coordinate their plans with the appropriate department chair or school personnel and complete a Learning Contract in coordination with the student and the supervisor from a site approved in part A above.

C. Student Responsibilities
Students enrolled in internships must abide by the SSU Student Code of Conduct. They must also abide by the SSU Internship Policy and by departmental internship policies. Students must sign the CSU Release of Liability form.

IV. Document Retention
SSU will retain documents related to each internship site and internship experience consistent with system-wide and campus document retention guidelines (see Executive Order 1031).
Campus Comments to EPC RE: 1st Reading of new Internship Policy and related process documents

FAQs now provided at Link to FAQs
https://docs.google.com/document/d/1q0_1dX71XUSD9SSeoUpMJCUpg8ZkHHxWxDSyD5CVPbtzY/edit# and changes to policy indicated with track changes in Link to Internship Policy Revision
https://docs.google.com/document/d/11Lyzp62b36v8luUYCsbE9IEZ7ZWznm0f/edit. Additional responses provided in side comments.

I think it would be wise to, to the extent possible, document any and all questions that were sent to Procurement and Risk Management regarding the internship policy, and their responses -- and specifically, if their response was "no," that we get some specifics about WHY they said no -- i.e. is this just their preference, or is it due to legal or CSU-level policy requirements.

Otherwise, we may end up with faculty continuing to ask those same questions, and not giving them adequate explanation when the answer "no" comes back. (Laura W.)

1. Prior concerns document in EPC policies in waiting folder:

I have heard Procurement and Risk Management have discussed the liability and other implications for everyone concerned but we haven't seen what that was to assess it in light of the proposed policy. That's huge given that risk assessment defines legal responsibilities in ways that have not existed until now.

The policy indicates that departments can develop their own policy, which

We are considering given unique aspects of our internship and curriculum, but it's unclear how this will affect liability of faculty or others. The policy as written appears to offer little choice, especially given the assertion that Contacts and Procurement can't do any more than they are.

Why can't Risk Assessment be involved outside CCE? Regardless, the opportunities for departments to develop their own policies and procedures should be made more feasible and cleaner so that such departments are able to make decisions about obtaining legal representation from CSU.

Commented [1]: See FAQ #4.

Commented [2]: See FAQ #4.

Commented [3]: See FAQ #5.

Commented [4]: See FAQ #6.

Commented [5]: See FAQ #5.
2. Prior concerns

The policy as drafted still doesn’t protect individual faculty members and the CSU transfers liability and risk. Any adoption of such a policy will expose individual faculty members to risk. CCE and SSU and individual Departments / faculty are exposing themselves to risk here that the CSU legal team cannot provide assurances otherwise.

3.

1. The policy too vague concerning the power of the Campus Risk Manager

The policy states that the Campus Risk Manager will develop procedures and set minimum requirements concerning Site Evaluation and Faculty Responsibilities – consistent with policy. But then, the policy statements within the Site Evaluation section are extremely vague. Hence, the Campus Risk Manager will be able to set standards that impact internship programs significantly, and faculty will have no recourse. Below, I make suggestions on how the Site Evaluation section could and should be made clearer. That will allow faculty/departments/schools to have more input on the bounds within which the Campus Risk Manager operates. But, I also believe that the policy should establish a process by which the “procedures and minimum requirements” set by the Campus Risk Manager are reviewed. Perhaps the policy can state explicitly that the Campus Risk Manager must have those procedures approved by EPC. That would build a feedback loop into the system.

The Site Selection policy needs to be clearer

a. What kind of insurance is being referred to in “proof of insurance?” And, if the University is defaulting to a CSU standard on this issue, then this University Policy should embed a link to that policy directly in this Section.

b. If an organization does not have adequate (or any) insurance, can students purchase insurance through a third-party agency? If so, what are the minimum requirements for that? And, if not, why not??
i. The statement that CCE will “work with faculty to address site visits needs for organizations outside the County” is entirely too vague.

For one, it is not clear from the Excel spreadsheet “9.19.FINAL PROCESS” that CCE is involved in all internship programs in the first place. If CCE is not responsible, then who do faculty work with to approve international internships? The Internship policy needs to state this more clearly.

Second, whoever is in charge of approving international internships will have enormous responsibility. What assurances do faculty/departments/schools have that the person will have the time and wherewithal to process these in a timely fashion? I foresee a huge bottleneck. The internship policy should establish minimum expectations so that faculty have recourse if internships are not being processed.

Third, this policy should state directly whether or not the University supports internships outside the country – like in Africa. If it does, then the policy should provide some clarity on what the University is willing to do to ensure that that option still exists. If it does not, then the policy should be clear about that.

- CSU Release of Liability is hidden

The Internship policy does not mention the CSU Release of Liability. I found it by clicking on a tiny little link at the bottom of the new Learning Contract Form. I have no problem with this release form being part of the process. I just think that it should be more front and center in the Policy. Below, I suggest that this could be mentioned under Student Responsibilities.

- It is not clear what “SSU Engage” is. All internship pathways appear to funnel through SSU Engage, but it is not clear what exactly that is. I believe that the Internship Policy should have a “background section” or some other means to specify the role of SSU Engage. I am concerned that SSU Engage may introduce “barriers” to the process that are currently hidden.

- There is a lack of clarity concerning age.

Within the Excel Spreadsheet “9.19.FINAL PROCESS,” the references to SSU Engage indicate that Students under 18 will need to wait until they are 18 to use the program. That gives the impression that students cannot participate in an internship until they are...
The new Learning Contract has a signature line for parents if students are under 18. The Internship policy should be clear about any age requirements. Below, I suggest that this could be mentioned under a Student Responsibilities Section.

There are no Student Responsibilities in the policy

I believe that there should be a section outlining student responsibilities. That section could refer to:

- Age requirements
- Signing of certain forms – such as release of reliability
- Conduct expectations (as representatives of SSU)

The policy needs to be clearer about how internships occur over the summer

The policy states that internships will be completed during the semester in which the student is enrolled. The policy needs to clarify the Institution through which they process summer internships (Extended Ed? State-side?). And, the policy should take a position on how the University intends to ensure that students do not pay a high price for summer internships. If they go through Extended Ed, then Extended Ed should be able to charge a fee to administer the internship, but that fee should not be high. If faculty are paid, then that fee schedule should be clear (and it should not be high).

The 12 units of internship for Bachelor’s Degree is too high

I understand that Departments can set their own unit maximums for their majors. But the University policy is important as well. Given that this policy excludes the majors that have special internship needs (e.g. education, clinical placements), I do not believe that a student should be able to substitute the equivalent of 3 4-unit courses with an internship. In my opinion, that is too high.

EO 1064 defines an internship as a formal agreement which: Integrates the student’s academic study with practical experience in a cooperating organization. It is an [on campus or] off-campus activity designed to serve educational purposes by offering experience in a service learning,
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. The internship Site is the organization at which the internship takes place."

“An internship is on-the-job experience at an on- or off-campus work setting directly related to career interests and major field of study.”

Our questions with regard to the above language:

Given the breadth of the EO’s language and the way that SSU is interpreting it, would the following scenarios now have to be characterized as internships and thus subject to the same guidelines for site evaluation and faculty responsibilities: Graduate and undergraduate students conducting off-campus research for Special Studies courses or for their MA thesis research (e.g., participating in a field school, or collecting data at a National Park). Students conducting off-campus research for regular courses during the semester. In most of our Methods courses (e.g., ANTH 314: Primate Observational Methods, ANTH 415: Ethnographic Methods), students visit an off-campus site regularly to conduct observational research. They fill out the appropriate Field Trip paperwork, but do not obtain explicit permission from, and are not supervised by, site managers. Sites may include zoos or other captive animal settings, museums, or even a local mall.

“Site Evaluation 1. A Safety Evaluation must be completed by the CCE prior to students beginning internships at a site. The Safety Evaluation will be updated every five years at the time the University-Agency Agreement is renewed. 2. A University-Agency Agreement, which includes proof of insurance, must be initiated by the CCE at the time the organization registers to host internships but does not have to be completed before students begin internship experiences. 3. The CCE will conduct Sonoma County site visits that are required due to Safety Evaluation responses and will work with supporting faculty to address site visit needs for organizations outside the County.” Our questions with regard to the above language: Internships do not always occur at one “site” that can be evaluated. For example, if a student interns with the Council on Aging and is placed with the Meals on Wheels program, where would the Safety Evaluation be conducted?

Commented [22]: See FAQs #3 and #14.

Commented [23]: See #15 and #16.
How exactly will the CCE “work with supporting faculty to address site visit needs for organizations outside the County”? This might apply to the following scenarios: a MA student who is interning at Plumas National Forest; an undergraduate student who is living at home in Los Angeles, taking SSU courses online, and interning at a local organization; domestic students interning abroad” (from page 8 of the policy).

Faculty are responsible for providing oversight for internships. This responsibility includes verifying that the internship is undertaken only by students with sufficient academic background to benefit from the experiences (minimum GPA, class status, major, etc.). This also includes designating mechanisms that guarantee oversight of the internship experience during the semester and evaluating progress on learning goals described in the LC and collecting and reviewing evaluations by the students and on-site supervisors. Faculty are responsible for sharing with the CCE any concerns they have about the educational appropriateness or safety of the site that is gathered from these evaluations. CCE will then address any concerns.

Our comments with regard to the above language:

The process of supervising student internships will become increasingly onerous for faculty members. During the semester – when it’s part of meeting one’s workload obligations – this may be manageable. But our majors sometimes conduct internships over the Summer. This amount of oversight may be so burdensome as to prevent research, travel abroad, etc.

5. A. Site Evaluation

1. A Safety Evaluation must be completed by the CCE prior to students beginning internships at a site. The Safety Evaluation will be updated every five years at the time the University-Agency Agreement is renewed.
We have students doing internship beyond Sonoma County and in other countries. Indeed, Global Studies degree strongly encourages student internships in other countries. This is central to the program’s pedagogy. The policy destroys that possibility.

2. A University-Agency Agreement, which includes proof of insurance, must be initiated by the CCE at the time the organization registers to host internships but does not have to be completed before students begin internship experiences. Many civil society groups do not have the ability to provide insurance. Why not allow students to purchase their own coverage, or seek other alternatives for insurance. And why not insert a note to see page 8 re. international internships here on page 2.

B. Faculty Responsibilities

Faculty are responsible for developing Learning Contracts (LC) with students and the internship site prior to the placement of individual students at the site.

Does this refer only to the Contract Course agreement? If so, say so. If more is expected, need to be explicit and indicate mode of faculty compensation.

Pg 3 - Faculty are responsible for providing oversight for internships. This responsibility includes verifying that the internship is undertaken only by students with sufficient academic background to benefit from the experiences (minimum GPA)

Why place a minimum GPA on this? Because a student struggles with in-class learning in no way extends to their ability to learn through practical experience and frankly with our achievement gap for URM students, you threaten to exclude those groups from interning.

Commented [27]: The internship policy includes sites outside of Sonoma Country (see FAQ #9).

Commented [28]: See FAQ#6.

Commented [29]: Not sure what this refers to - the current draft policy is 4 pages.

Commented [30]: The Learning Contract is included in the packet of Internship Policy as part of the process materials.

Commented [31]: The policy does not necessitate a requirement for a minimum GPA. Additional language was added to the policy (pg 3) to clarify that departments may include their own additional requirements in departmental policies. See also FAQ#5.
1. Since there is no single site in the internship, how would a "site visit" be done? Would it be the organization's office?

2. Regarding DSS. There are physical limitations to such field-work based internships that are not easy to overcome. For example, wheelchair accessibility is not practical in a field site. Would that preclude these types of internships being offered with this policy since we couldn't provide equal access to all students?

EPC Discussion Items (to frame meeting discussion time):

1. If implemented; will generate a large amount of student confusion. Given the dubious likelihood that resources and personnel for effecting the process will be in place in advance will exacerbate the confusion.

Some terms are undefined and worrisome—e.g., “registration.” The 4.4 intern agreement deadline seems to imply that the agreement is restricted to faculty and students but as we know site supervisors and their processing of forms can take highly variable lengths of time, especially when background clearances must be obtained prior to completion of an agreement.

The policy also says that a “majority” of the internship must be completed during the semester the student is enrolled. What is “majority”? This is one of many terms whose meanings will only become clear when someone at some point decides to impose a definition.

The policy clearly has workload implications for faculty. Have these been taken into account? Have Deans been consulted? They will have to work with chairs and faculty intern supervisors to deal with load issues. It will definitely lead to huge increases in workload during the “transition” period. Educating and explaining changes and future structure while trying to work with CCE and site supervisors, site visit time, energy, and resource commitments can and will be substantial.

2. Commented [32]: See FAQs #15 ad #19.

Commented [33]: See FAQ #20.

Commented [34]: See FAQ #21.

Commented [35]: There is not a Section 4.4 in this policy.

University-Agency agreements must be initiated by CCE when an organization signs-up to host internships— but it does not have to be completed before a student internship experience begins (Section III.A.2).

See also FAQs #9, #10, and #19 for information regarding site visits and concerns regarding approval timelines.

Commented [36]: This language is no longer in the policy.

Commented [37]: See FAQ #22.

Also, the internship policy has been presented to the entire campus for comment and undergone substantial revisions based on these comments over the last few years.
The current draft of the policy sec. 4.3 states that “the practical learning component of an internship assignment shall total at least forty-five hours per unit of credit.” This does not seem to be neutral between the two approaches. A student in department QQQQ who does 180 on-site hours but no corresponding academic work will get four units of credit; for a student who also must do some scholarly reading that pairs up with their internship work and write two papers, they’d still have to do the 180 hours to get 4 units. This imbalance seems to put pressure on us to either offer fewer credit hours of internship for the same amount of total learning hours (including academic and practical work); or to require students to do more total (academic + practical) work than their peers in other departments for the same number of units. Both of these results seem unfair. As a third option, we could not require an academic component or we could separate academic and practical hours into separate classes, but that would cost students an internship option that integrates theory and practice. A more neutral policy might be to require the minimum number of hours to be the same as it is for our regular classes—15 hours of face-to-face practical hours, just as regular classes get 15 hours of face-to-face classroom time—for each unit of credit. Then whether the extra hours, to get to 45 total hours of work per unit, are practical, as in department QQQQ, or academic, or some mix of the two, would be left to each department.

More on this issue:

Hi- maybe if you could give me a description of how your current internship courses run it might help EPCs discussion of the 45 units with respect to the cs code and faculty time? Like what do the students do- do they meet with you regularly, do you spend your workload in direct contact teaching or is it grading or working with the partner....?

Jenn

Hi Jenn,

Well, for one thing we run them a variety of ways with respect to this question. Each student has an internship that is tailored in such a way that it makes the best sense for
them. So, some of our students do 45 hours/unit of on-site learning. But for others it makes more sense to do more academic integration. For those students, we require a minimum of 15 hours/unit of on-site learning, and then the rest of the hours can be tailored. Another other things, their work might involve doing research related to their on-site work and doing reflections based on how their on-site work connects with what they’ve been studying in other classes. When I supervise—and sometimes others supervise, and they may do things differently—I typically ask for a couple of face-to-face meetings with them (at the beginning and end of the semester) and do the rest by email. Again, we believe that this sort of adaptability is in the students' best interests.

But this isn’t a question of my workload, since it’s above and beyond our normal workload (that is to say, I don’t get a course release or any other offset or compensation for my internship supervision, and I already cover my other service and advising responsibilities in other capacities). It’s a question of what the students are getting out of it.

4.

For many majors on this campus, internships are central to their curriculum. For those majors that emphasize local internships, this policy will not impact their programs significantly. But for those majors that emphasize national and international internships, this policy will have a profound impact on their programs and curriculum. Given the special role that internships play within curriculums across majors, I believe that standard governance procedures are not adequate for this particular issue. I respectfully request that EPC establish a special process for reviewing this policy to ensure that faculty, departments and schools have adequate time to review the policy, assess its impacts, provide meaningful feedback, and receive assurances that the final policy will not undermine their ability to deliver their curriculum.

● Section III.A: “We have interns who work at far-flung sites, such as in Los Angeles or Washington, DC. If there is some alternate site visit procedure for these locations (as suggested in A.3), shouldn’t it be stated explicitly? If there is no such alternative, why

Commented [38]: This seems to be a comment directly related to a specific course. There is a disconnect between faculty, department policy, and definitions of internships vs. service learning vs. just a regular class with field trips. EPC should discuss and decide. Also see FAQ #3 and #23.

Commented [39]: Yes. EPC is currently on its 3rd major round of drafting, taking campus comments, and revising this policy. EPC’s goal is to support faculty purview over curriculum as the campus moves into compliance with the EO requiring a campus internship policy so that we can minimize our risk. Additional language was added to the policy to require annual review of policy and procedures by EPC.
are we requiring that for local sites? (And in general, the fewer barriers to site registration, the better!)

- Section III.B: “The rule of 45 hours per credit unit should not be restricted to “practical learning” only. Some departments (including my own) wish to blend practical learning with academic work (such as writing essays or doing research connected to their on-side work). This work, if it amounts to 45 hours/unit, should be eligible for the same amount of academic unit credit as students who do 45 hours/unit at an external site. In April 2018, there was an email exchange between Jenn Lillig, Merith Weisman, Katie Musick, and myself, and it was reported the Katie and Jenn had tracked down that this was actually CSU policy as mandated in a memorandum from the Chancellor’s office. In short, while the total amount of work needs to be 45 hours/unit, that can be divided in a variety of ways between “practical learning” (should that be defined in this policy?) and academic integration and reflection. Policy should be written in such a way as to give departments maximum leeway within that range.”

- FACULTY OPTIONS FOR IMPLEMENTING RISK MANAGEMENT PROTOCOLS:

Chart: “Why should students have to release their images in order to participate in internships? That seems like an undue imposition on their privacy.”

I have talked to several of the internship coordinators in Social Sciences and one of the consistent themes is concern about why CCE needs to be the liaison for this process. There are concerns that faculty will have additional workload resulting from the requirements of this process, but resources will go to CCE for management when it doesn’t seem necessary for CCE to be involved at all.

Those I have spoken with so far are hoping for more specific information about what kind of support for faculty for site visits both in and out of Sonoma county will be provided...it is not

Commented [40]: The language in this section was modified to clarify the inclusion of sites everywhere. Also see FAQs #9 and #10.

Commented [41]: Same comment as above. EPC should discuss and decide. Also see FAQs #3 and #24 also.

Commented [42]: The chart has now been converted to an Internship Process document. See FAQ #23.

Commented [43]: CCE will coordinate with the Office of Risk Management and Contracts and Procurement to coordinate the site approval process while faculty lead the curricular and degree related aspects of internships. These groups are the only ones who can sign contracts and they do not have the capacity to work with individual departments. According to the process document, departments that are currently working directly with contracts can continue to do so for 24 months.
enough to say that they will rarely be required. Faculty want to know what the protocol will be when site visits are required.

Other concerns include how the bureaucratic process suggested here will affect agencies’ ability to act quickly, as well as the statement that learning contracts must verify that internships will be completed during the semester in which the student is enrolled (e.g. summer internships, etc.).

There have also been concerns about whether adopting this process will result in standardized learning objectives in the future which runs counter to the intent of individual internship experiences in different departments and schools.

Jenn and Christine,

Attached please find my feedback on the proposed draft internship policy. I have shared this with the Communications and Media department (who will be the most affected), and the department echoes my perspective here. I have also shared this Stefan Kiesbye, chair of English and Stephanie Dyer, chair of Hutchins and Hollis Robbins. Additionally, I have shared this with Ianthe Brautigan, former and A&H Internship coordinator.

Please let me know if you have any questions or concerns.

Thanks so much for your service to EPC.

Feedback on the Interim SSU Internship Policy

As a faculty member supervising Communications internships for Arts & Humanities (as well as English and Hutchins), I’m excited about the development, implementation and publishing of a university-wide internship policy. This is welcome news!

However, after reading the draft proposal, I have some feedback that I would like to share.

Under Section III, Internships and Risk Management, I would like to see conventional retail positions (i.e., sales clerks), servers, bartenders and tasting room staffers (in restaurants, bars and wineries) added to the list of unacceptable internships.

Under section III, I have learned that the safety evaluation is a series of questions that supervisors must answer online in order for their organization to be considered acceptable, and this process will be overseen by the Center for Community Engagement. My understanding is that one of the criteria to meet safety standards is that an organization must have two fire exits meeting up-to-date OSHA standards.
According to Occupational Safety and Health Administration (OSHA), at least two exit routes must be available to permit quick evacuation of employees and other occupants in the event of an emergency.

Standard 29 CFR 1910 Subpart E says the exit routes must be located as far away from each other as possible so that if one route is blocked by fire or smoke, employees can use the other route to escape.

However, a single exit route is allowed where the number of employees, the size of the building, or the arrangement of the workplace would enable all employees to exit safely during an emergency.

Fire escapes, accessible windows, or other means of escape should be available where only one exit route is provided.

In some workplaces, more than two exit routes may be necessary to safely evacuate all employees.

OSHA defines an exit route as a continuous and unobstructed path of exit travel from any point within a workplace to a place of safety. An exit route is made up of three components:

1. **Exit access**: The portion of the exit route that leads to an exit.
2. **Exit**: The part of the exit route that is usually separated from other areas to provide a protected way of travel to the exit discharge.
3. **Exit discharge**: The part of the exit route that leads directly outside or to a street, walkway, refuge area, public way, or open space with access to the outside.

Having the appropriate number of egress points, as we know from living in Sonoma or nearby counties, is crucial for safety. However, other OSHA requirements that apply to exit routes include the following, which may be difficult for smaller non-profits (such as the Sitting Room) solo practitioners and small boutique firms to follow. These requirements include:

- Exit doors must be unlocked at all times.
- A side-hinged exit door must be used.
- Doors that connect any room to an exit route must swing out in the direction of travel.
- Exit routes must be at least 28 inches wide at all points.
- Exit routes must be unobstructed and free from clutter (this one I always agree with).
- Adequate lighting (including emergency lighting) must be provided so that an employee with normal vision can see along the exit route.
- Each exit must be clearly visible and marked by a sign reading “Exit”.
- Decorations or signs may not block the visibility of the exit route door (this also makes sense).
- Signs must be posted along the exit route to show the nearest exit and how to get there.
- The line of sight to the exit sign must be clearly visible at all times.
- Any doors or passages that could be mistaken for an exit should be marked as “Not an Exit” or for its actual use (e.g., closet).
Exit signs must be lit with a reliable light source and a distinctive color. The specific requirements require each sign to be illuminated to a surface value of at least five foot-candles (54 lux) and also allow for self-luminous or electroluminescent signs.

In fact, the above list would likely eliminate a great deal of small businesses in Santa Rosa, as well as surrounding cities, towns and rural counties, such as Napa. As you know, Sonoma County is not a major urban area and many of the businesses are small to midsize.

As an example, in the Communications and Media Studies department, we regularly place students at a well-established public relations firm, AndCo PR, which consist of one employee owner and some contract workers. Students do their work virtually and owner Jamie Tobin gives students extensive training. However, this Santa Rosa firm would not pass the safety criteria because of the lack of fire exits and, essentially, its size. Yet students complete their work virtually and do not go into the office in a conventional sense, so from my point of view, the safety issue is abated.

Additionally, we also have companies that are based outside of Sonoma County or even outside of the country. For example, the owner of the magazine Wicked Sonoma is a company based in Canada. There is a Sonoma “office” where salespeople work, but the editors are actually in Canada. Students are writing magazine articles that truly help bolster their portfolio and all work is done virtually with extensive oversight and supervision. In this case, the company would have the necessary safety features; they might be knocked out due to location, yet the real work is all virtual.

Naturally, Sonoma State students benefit from interning in brick and mortar companies. In fact, it is preferred. Whether an organization is large or small, students must never meet with supervisors in their place of residence or in any private residence. This should be firmly stated in our SSU intern policy. Yet solo practitioners or small firms without a brick or mortar office shouldn’t be completely eliminated (and there are so many companies in Sonoma County that fall into this category). However, firm safety procedures should be put in place. Employers who work in home offices should be able to meet with students in shared office spaces or on campus in the Schulz library.

In section 3A, it sounds as if site visits will be made for locations that require safety evaluations (I’m assuming this means companies who fail the online test/set of standards). As stated earlier, it is my hope that stellar boutique companies, mom and pop shops, and solo proprietors will not be across-the-board eliminated. Given the suburban and small city environment of our county, this would terminate many internship opportunities. Furthermore, I hope there is enough personnel to conduct such visits. Every semester, we have between 60-80 Communications students placed in internships, not to mention between twenty Hutchins students and six to twelve English students. Many of the established placements are in small businesses, particularly for our Communications majors. In order to transition to this new system, I hope enough time has been allotted to create an arsenal of approved internships. This is truly important for departments such as Communications, as well as Hutchins where internships are mandatory.

Currently, students have until about a week or two before census each semester to register for an internship, which is a contract course. We need to be sure that the internships that students have selected have met all approvals and safety considerations in adequate time for registration. It seems like we would...
need to change the timing of when students register for internships in order to give adequate time for approvals (as well as to insure that students have watched the safety video).

In the future, when the University has a true bank of approved internships, this might not be as necessary. But currently, this is not the case.

Under section B Faculty Responsibilities, I do question why no more than eight units can be applied towards in one department whereas students can have up to 12 units of internship. That seems to suggest that students can go outside their department for an extra four units. I don’t understand the reasoning here. Why can’t it just be 12 units maximum?

I am also curious about a faculty member’s responsibility to verify that the internship is taken by students with sufficient academic background to benefit from the experience (such as minimum GPA and class status). Will that be something to be determined on a department-by-department basis or will there be across-the-line GPA and class standing minimums to be met?

In section IV documentation retention, it is my understanding after speaking with the Center for Community Engagement, that in the new system, faculty will be responsible for holding onto documentation. I hope that this isn’t the case or perhaps a misunderstanding. Currently, in Arts & Humanities, internship agreements must be signed by the supervisor, student, faculty sponsor, the chair and the dean. The paperwork then goes to Dennis Goss, the scheduler who inputs it, before it’s officially registered. The Scheduler keeps records of the agreements. I would like to obtain clarity on documentation retention. Currently, while I do have a shared office, there’s not adequate storage for documentation retention, nor am I am compensated for this sort of documentation storage and retrieval.

According to Merith Weisman, plans are for students to register online for internships and for the internship agreement forms to be emailed to faculty for final approvals. Students would still need to meet with faculty in person.

Receiving paperwork via email seems cumbersome and problematic in terms of storage and retrieval. It would be akin to students submitting all of their assignments via email versus Canvas or in person. It seems to me there could be a Canvas like solution (in other words, some sort of organized virtual holding tank). From an administrative perspective, it makes no sense, even if faculty (as suggested by Merith) create a separate internship email. Hopefully, a happy tech solution can be worked out.

I also would like to know the process of communicating the new procedures to students. Will each department be responsible for communicating the new procedures during orientation? I find that communicating through email is an inadequate method to reach all students, as many undergraduates are overwhelmed and barely skim their emails. It seems we might consider a multi-modal approach—emails,
orientation, flyers, speaking to classes, social media, student newspaper ad or article, etc. I’d be curious to know if a communications plan is being formulated and who would be responsible for it.

Finally, thanks for providing a forum for feedback. I want to thank everyone on the committee for their hard work and dedication to this process.

I’m truly looking forward to learning more as the policy continues to develop.

Thanks for the opportunity to provide these thoughts on the proposed new internship policy for SSU.

I offer the comments below from my experience as a faculty member at SSU, first in the Department of Environmental Studies and Planning and now in the Department of Geography, Environment, and Planning. For many years, and until its merger with SSU’s Geography Department, ENSP required an internship for all of the students in our major. My particular perspective was students in the Department’s Planning concentration, though at times (typically when a departmental colleague was on sabbatical) I supervised internships by students in other “study plans” within the major. Currently, GEP’s “Planning for Sustainable Communities” is the only concentration within the major that requires an internship.

Role of the Center for Community Engagement in relation to that of faculty

I’m assuming there are good reasons for CCE to have a central role in implementing SSU’s internship program, as described in the proposed policy. However, while I applaud the CCE for its mission and work, I would urge careful consideration of adding too much administrative responsibility for CCE to what I think should be the primary supervision role of faculty from the student’s department and program. I believe the proposed policy recognizes a “division of labor” and responsibility in this regard (e.g., “Developing internships is generally the work of the faculty, …” III, para 5), I would encourage clarity with regard to this primary role for faculty.

My experience has been that faculty subject matter expertise is critical to aiding students in obtaining and completing an internship that has a valuable role in their education at SSU and their professional preparation. So, for instance, my own experience with planning, the planning profession, and the professional planning community add significant value to our Planning concentration’s internship program. Again, I believe the proposed policy recognizes this: “An internship is on-the-job experience at an on- or off-campus work setting directly related to career interests and major field of study.” (Emphasis added, III, para 3)

Timing

Over the years in ENSP, we found that lining up internship opportunities with our academic calendar can be a challenge. Often, the needs of the government agencies, non-profits, and consultants and other businesses who engage our students as interns do not align with the beginnings and endings of our semesters. This may be a matter of their funding and budget
cycles, their staffing and workload situations, and other factors. We should maintain enough flexibility to not lose valuable internship opportunities.

Minimum grade point average to do an internship
I recommend against this. I’ve seen many students for whom an internship was a highpoint of their education at SSU, despite their having lower GPAs. And, of course, this kind of limitation can lead to two tiers of students within a program without a corresponding benefit.

Finding an internship
We should not assume that all students will secure an internship through a central “clearinghouse” of internship opportunities or that all internships will result from the “Internship Site’s” posting an opportunity with the University. While some internships arrive through this path, in my experience many don’t. For instance, my advising with students regarding their required internships typically begins with me asking, “What do you want to do when you graduate?” Often this leads to an extended, multi-meeting conversation; research on the student’s part with my assistance; “coaching” with our Department’s “Planner in Residence” and guest speakers; and more. Sometimes it leads to “cold calls” (actually, emails) to potential “Internship Sites” where a student would like to do an internship, even if none has been advertised.

I hope these comments are useful. I’d be happy to discuss these and any other aspects of internships at SSU. From my experience, what I hear from our graduates, and the input of professional employers, the internship is a critical component of our Planning program at SSU and, I don’t doubt, other programs at SSU.

ANTHRO and HUMAN DEVELOPMENT:

All,

I am coming late to the party, and Jenn and Merith have already answered questions expertly and thoroughly. I think the important pieces of reassurance is that 1) the policy doesn’t dictate which internships can be approved— the risk management questionnaire is the place where safety and health issues emerge and 2) if those issues emerge, the CCE would help the faculty member navigate the process and figure out how to work with the partner to meet the insurance requirements. The home visit scenario is often raised, and I think those scenarios will have to be addressed internship by internship, since each one will look different from a risk perspective.

I look forward to the discussion at EPC tomorrow.

Best,
Karen
On Wed, Apr 15, 2020 at 2:55 PM Benjamin Smith <smithbe@sonoma.edu> wrote:
Thanks a ton, everyone, for clarifying these issues. I certainly understand that we desperately need a way to ensure student safety at our internship sites, and I have a lot of trust in Merith and the CCE for negotiating these rules in a way that balances issues of safety with opportunities for learning.

best,
Ben

On Wed, Apr 15, 2020 at 2:10 PM Jennifer Lillig <whilesli@sonoma.edu> wrote:
Awesome thank you Merith! And thank you Anthropology. The fact that so many people have participated iteratively in asking these questions and reading the policy over and over that we have been able to really get at what some of the concerns are and try to alleviate them either through policy language, better definition of terms, and just overall discussion. So thank you!!

Jenn

On Wed, Apr 15, 2020 at 2:07 PM <merith.weisman@sonoma.edu> wrote:
Hi all,

Your concerns are absolutely well taken, Ben. The CCE has absolutely no desire to be the gatekeeper for internships. Our focus will be on helping to get all requirements of the insurance policy met so that if there is legal action, the University and the faculty are protected. That said, I've been told that the first example you give will be ok as the contract will be between the primary site and the CSU and it will "cover" secondary sites to companies and other organizations when the students working at those secondary sites are doing so as part of the internship. However, home visits are almost never acceptable with the internship insurance policy. If you do know of other CSUs that allow home visits as part of an internship (not in nursing, counseling, education, or social work as those fields have a different insurance policy for their field-based work), please let me know. I'll follow up with them and find out how they're doing this so we can replicate.
I also agree with Jenn that these concerns are not really about the internship policy (unless, like she says, I'm missing something) and are more process questions. This is important because at some point, it is likely that SSU's internship risk management process will be audited. When this has happened at other CSUs, their processes have changed, usually in small ways, but sometimes have become more restrictive. So while I'm told now that secondary sites are covered by the contract with the primary site, this may not always be the case. Still, no matter how restrictive complying with the insurance policy becomes, not having an internship policy does not help Sonoma State or individual faculty. Rather, having the internship policy is one of the requirements of the insurance policy, so currently, we are noncompliant.

I have shared all of this for the sake of transparency. I hope this is helpful.

Merith Weisman
Sonoma State University
Director of Community Engagement and Strategic Initiatives

On Wed, Apr 15, 2020 at 1:50 PM Benjamin Smith <smithbe@sonoma.edu> wrote:
  Hi Jenn,

  Thanks for your response!

  I guess my concern is with whether these kinds of internships are especially likely to have "issues triggered by the site evaluation." And, if so, could they regularly be overcome? I don't see where we have information about whether that's the case, but I could certainly be mistaken.

  However, I suppose what you are saying is that the criteria that trigger safety concerns are formulated at the CSU level, and that they are therefore out of our hands. Hopefully, this is one of those situations where there is enough wiggle room in the policy for us to maintain these kinds of internships. I imagine that whatever wiggle room we have here has to be established through how we interpret CSU policy institutionally (at SSU) and through the commitment of our awesome CCE to maintaining these kinds of internship experiences.

  thanks again -
  Ben
On Wed, Apr 15, 2020 at 12:06 PM Jennifer Lillig <whilesli@sonoma.edu> wrote:
Hi Ben-

Thank you for the feedback. I copy Merith and Karen to see if they have any additional comments (and to make sure I haven’t mis-spoken!) I do want to make sure folks understand that the policy itself is not what would keep internships from occurring. There is nothing in the SSU policy that dictates what would cause an internship site to be declared not viable. (Unless you see language that is concerning?) In order for a site to be declared unsafe, there would have to be issues triggered by the site evaluation that happens virtually when the agency registers in the database and answers a bunch of questions. If there was an issue, then that would lead to CCE working with the agency to clarify and perhaps a site visit of some sort to try and work out the issue first. The evaluation form comes from the Chancellor's Office- so if similar internships are happening at other CSUs that seems positive. Maybe Merith can comment some more if she is familiar with similar internships at other CSUs or given the details you have provided.

The way I have started to look at it overall though is that without the policy and process in place, the faculty member and dean are the only two people that have signed off on a student doing an internship when they register for credit. So if something happens, we are in violation of not having a campus policy and we have nothing to fall back on. Let me know if you’d like to discuss further before tomorrow- otherwise I saw that Laurel sent you the link to the meeting.

On Tue, Apr 14, 2020 at 9:33 PM Benjamin Smith <smithbe@sonoma.edu> wrote:

Dear Jenn,

I wanted to write you with a statement from the Anthropology and HD programs about the upcoming reading of the new internship policy at EPC. I have pasted that below my signature.

I also wanted to ask if I may “attend” EPC this week. I believe I’d need the Zoom link.

I've been in conversation with Emily Ausencio about the policy, and she’s been working hard (alongside the CCE) to address some of our concerns. However, the statement below outlines what appear to be some outstanding issues. Our statement takes as its starting point our understanding of the current state of the conversation on the issue.

Thanks for your help!

My best,
Statement on the Internship Policy Revisions

As members of the Department of Anthropology and the Human Development Program, we appreciate the current effort to develop a set of policies that ensures the safety of our students in internships. We do, also, want to ensure that the experience-rich, "out in the field" kinds of internships that many of our students pursue remain possible to take up – as much as possible given concerns about safety.

Briefly, the kinds of internships we are concerned about are those that, although they might have a primary site (e.g., an office, a museum, a zoo, a medical setting), also push students to go “into the field” in some way. For example, a Caltrans internship might require a student to evaluate a possible archaeological site in what is otherwise a highway construction zone. A nutrition management internship for the Council on Aging might require a student to visit a client’s house to bring a meal, evaluate the client’s nutritional needs, etc. These are valuable learning experiences for students.

Our understanding is that these kinds of internships are available in other CSUs, and that – relative to institutions that have similar internship policies – the status of these “field sites” or “secondary sites” is negotiated as a part of the contract with the original, primary site. Although this sounds like a reasonable framework for making these kinds of decisions, we would still like to be assured that – as much as possible – the kinds of “field experiences” are likely to be approved as a part of a primary site’s original contract. It is unclear to us what criteria they have to meet as well as - in a worst case scenario - whether such criteria effectively preclude these kinds of sites from our internship programs.

We value these kinds of internship experiences for our students, and we hope to have them continue to be a vibrant part of the curricula we offer.

--
Benjamin Smith
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Thank you for the feedback- I added some responses below. Any change to the text of the policy will need to be made by motion at the meeting. I'm glad you were able to work through what policy you fall under! :)

Jenn

Section III - Please include Preliminary Administrator Fieldwork in the list of exclusions next to teacher preparation placements. This is done in conjunction with our administrator credentialing program and CA Teacher Credentialing Commission.

It is not that these activities are excluded from the policy, it is that they are not internships as defined and are therefore covered specifically by other policies. They don't need to be defined excluded and the activity listed above is covered by another policy.

Section III - p.2 - second paragraph

This states that CCE staff will be involved if invited to do so. Yet, throughout the policy there is clear inclusion of CCE. For example, “must be completed by CCE...” (Section A) That seems unclear.

CCE Staff will help faculty design internships only if they are invited to help. It is the purview of the faculty to design curriculum. That sentence refers only to the design of the internship experience itself in that paragraph. We removed the entire paragraph to avoid this confusion.

Section A. Site Evaluation/Visit - This seems to be the responsibility of CCE. Right? Maybe calling this CCE Responsibilities?

This would be done by a motion at EPC tomorrow if desired.

Section A. 2. Where does an organization register to host internships? Perhaps adding a section on Agency Responsibilities would clarify their role in this, too.
Our policy is about what SSU must do to have internships. We can't write policy specifically telling the Agencies what to do. The website where agencies register is part of the process document and facilitated by CCE. We keep the process out in case we need to change it. Otherwise we have to change the policy too and that's a bigger project.

Section B. Faculty Responsibilities - Since Learning Contracts (LC) is capitalized, is there a specific form/template for these or is it left to each program? Are these then filed somewhere?

Yes- it's in the same folder as the internship policy draft that EPC made available for the campus to review.

Section B. Student Responsibilities - Including a link to CSU Release of Liability form would be helpful here.

This is a process- we leave links out of policies as much as possible because they often change. The link can be found in the process document.

Hi Kelsey- thank you to all for providing us this feedback. Let me try and answer the questions now and then if you think they need further discussion let me know as it relates to the internship policy let me know. I answered below in bold italics.

Thank you again for reading and participating in the feedback process!

Jenn

CAREER CENTER

1. This statement: “Non-credit bearing experiences are not subject to this policy....however, the University will assume no responsibility for these non-credit bearing experiences. Students may pursue them on their own and they will not receive academic credit.”

   ○ Our biggest concern regarding this statement: for students who identify internships posted in Handshake (paid or unpaid) **who want to request academic credit via their department** - how does/would that work? There are thousands of internship postings per day in Handshake, which are directly related to students’ majors & career interests. It would seem important to have something written about internships found on handshake (also through personal connections, etc), and what the process would look like to get those internships approved if a student wanted to request academic credit.

   **Students are certainly welcome to find an internship from anywhere and then ask a department for credit and if the department agrees then the policy would be followed as is. The company would need to enroll in the database if they weren’t already, etc. We try**
to keep the policy language general since computer programs and so forth change. So if the student wants to get credit for an internship they found they should speak with an instructor or advisor in the department they want credit from. Otherwise, the internship is just not affiliated with the university and this policy doesn't apply. The Career Center could certainly work with various departments to let them know about Handshake and how to help students find internships - but we can’t mandate this in university policy.

2. The language in the Community Engaged Experiential Education chart:

- "Common Good issue" - this language is not used by most organizations, even non-profits. This language is confusing to students, community partners, and employers in the private sector. There are also plenty of internships & jobs that support "common good" (more commonly referred to as "social impact") that exist in for-profit/private sector.
- "For-profit" - employers (and the Career Center) use the term "private sector." This includes many industries, and "for-profit" can be interpreted as disparaging and/or biased towards public sector opportunities.
- In general: the opportunities highlighted for students are mostly non-profit and community organizations. However, "for-profit" is mentioned only briefly. It makes sense in that the CCE mainly cultivates relationships with local non-profits, but there are endless opportunities for students outside this as well, and the chart does not make that clear. There are interesting studies that research the gender pay gap in reference to major/industry and social identity, and so, we want to ensure equitable promotion of internship opportunities to all students, especially when it comes to paid vs. unpaid, and impacts on their future earning potential. The language creates a perception that there are more opportunities in the public/non profit sector, which are likely unpaid.

This chart is not part of the policy but is utilized by the Center for Community Engagement. I can forward this to the director (Merith Wiseman) if you like- but this really isn't EPC’s purview.

3. Companies often reach out to us at the Career Center wanting to develop and create internship pipelines for SSU students, and students who come to us for support in their search.

- Although it makes sense that the CCE will be the keeper of this for risk-management purposes, it would be helpful to have language around how the CCE & Career Center will support students collaboratively in the internship process.

These are the high level issues we wanted to share ASAP. We are also happy to share more and connect further about this.
I think the Career Center and CCE can certainly work together and how you do that—and advertise that—is up to you. But it’s not appropriate for a policy to dictate that. This policy is strictly to set up that we have a policy (which dictates a process) to be followed in order to minimize risk. Again, I think this is a conversation for the Career Center and CCE.
CCE's role for internships:

**Question:** What is the role of CCE that is different from the role of risk management?

**Answer from documentation I could find:** Here is the current response to this issue: “CCE will coordinate with the Office of Risk Management and Contracts and Procurement to coordinate the site approval process while faculty lead the curricular and degree related aspects of internships. These groups are the only ones who can sign contracts and they do not have the capacity to work with individual departments. According to the process document, departments that are currently working directly with contracts can continue to do so for 24 months.”

**Responses:** This still does not address the question of why CCE is involved and what their role is that is different from Risk Management.

This doesn't quite answer it for us. I would still like to know why the Office of Risk Management, etc. doesn't work directly with departments and faculty. What is the special role of CCE that can't be filled by anything else and is essential to this process?

Do other CSUs have a CCE equivalent and if they do, do all internship approvals run through their office?

This one is particularly interesting to us. In part because we often look to other CSU's to help provide models for new programming, etc. so why not this? And I'm interested to know how CCE and equivalent offices function on different campuses to give us an idea of how much or little involvement in curricula the office has. Finally, if we find the SSU proposal is unique within the CSU, we should try to figure out why and what is the unique contribution of CCE to our internship process. If we can't put our finger on the role of CCE and what makes it essential for our internship programs, we may have to rethink the entire proposal.

**Questions:** Can we get clarification on the extent of the role of CCE in making any decisions or recommendations beyond risk management?

Will CCE have any role in assessing the LOs and other curricular aspects of internships? The limits of the role of CCE in departmental internships needs to be explicit in these documents, I think.

**Answer from documentation I could find:** Section III paragraph 5 of the revised policy states “Developing internships is generally the work of the faculty; however, the Center for Community Engagement staff or other approved staff members will assist faculty by developing internships, 

Commented [1]: Risk management is a campus wide process. The Office of Risk Management interacts with the campus as a whole- not with individual faculty.

Commented [2]: They have no role unless they are invited or asked for help. This is part of the Learning Contract.
conducting site evaluations, and approving learning contracts if the staff member has been delegated or invited to do so in writing by a department chair or dean.

Response: I'm curious about deputizing CCE staff to sign learning contracts in place of faculty. Does that mean the Dean or Chair can authorize this even without consultation with the faculty internship coordinator? Is there a particular reason this is included in the role of CCE? Is it possible to reword to something like “Developing academic content and learning outcomes of internships is strictly the work of the faculty. The role of CCE is limited only to evaluation of safety of an internship site for risk management.” This rewording establishes the limits of CCE. The current wording doesn't preclude them from intervening in faculty and departmental affairs. And with this rewording, it begs the question again, what necessitates CCE's involvement? Also, isn't it the role of the department internship coordinator to generate internship opportunities and develop community relationships? If CCE does that work, does that change the faculty internship coordinator's responsibilities? Is that desirable?

Workload:

Question: Is there any anticipated additional work for faculty internship coordinators?

Answer from documentation I could find: What are the workload implications for faculty?

Faculty working with current internship sites may need to inform the site and new students of the new registration process with SSUEngage. If current internship sites do not meet the minimum requirements, CCE will work with them to address issues. If sites do not wish to comply with minimal requirements, faculty may need to modify their internship. CCE will perform any necessary virtual site visits regardless of location and any necessary in-person site visits in Sonoma County and work with colleagues and faculty if necessary in other locations. It is hoped that the three-year roll-out will help to mitigate faculty workload during the transition. General faculty workload considerations for internships are governed by the CS number and CBA.

Response:

One question that I do have: it looks like SSU is moving to a new digital platform to manage internships—SSU Engage. Will the process of students signing up for internships be digitized also—or will they still have to fill out the paper internship forms (now called Learning Contracts) and also hand sign the release of liability? Maybe, if appropriate, could the internship policy clarify which parts of the internship process will be digitized and which might still require actual paperwork. This is important to us as a work-flow issue. It would help if the policy, or at least the communication about internships specifies how the paperwork will be routed. Are the learning contracts and liability forms going to be digital or paper?

Commented [3]: There is no signature line for CCE on the learning contract. I'm not sure where this is coming from??

Commented [4]: This part is all about why the CCE is the point person for this process.

Commented [5]: The CCE has point on this because we need a unit on campus that is going to manage institutional issues related to internships. The Office of Risk Management can't work individually with faculty and departments on individual internships, although the Office of Contracts and Procurement will review the contracts for each site as those come forward. The CCE brings expertise in site evaluation and risk management and runs the software tool that faculty, students, and community organizations will use moving forward to register and track internships. Part of risk management is being able to track all our internships and insure they all comply with CSU regulations and institutional policies. The CCE has the expertise to do that.

The role of the CCE is to support faculty, students and community organizations, not to interfere in the curriculum. Neither is it the role of the CCE to establish relationships with community partners—that is also the faculty's role. The CCE's role is support and compliance.

Commented [6]: Process isn't included in policy because processes change.

Commented [7]: We are moving towards digitizing our internship process. That does not mean we will immediately move all processes from paper. We can roll out that shift. Over the next year, we should increasingly move to digital processes. We can start by creating PDF writable forms and move from there.
Policy:

Question: Point of clarification: I see that according to the definition of internships, it appears that working in a school would not qualify? (III of the policy, according to EO1064). Is this correct?

Answer from documentation I could find: My read of this is that a school would qualify unless it is a student teacher type of placement. Can you be more specific about where you see that it would not so I can investigate further: "Integrates the student’s academic study with practical experience in a cooperating organization. It is an [on campus or] off-campus activity designed to serve educational purposes by offering experience in a service learning, 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. The internship Site is the organization at which the internship takes place."

Response:

The reason I ask is that we often have students in our major do internships in schools – typically high schools. This allows our majors to double-dip – they can earn hours towards their teaching credential program while also getting upper-div major credit. Of course not all (or even many these days) major students do want to teach; this has been an important part of our program and I would be keen to preserve in-class placements as internship-eligible. To be clear: our students are not ‘teaching’ but rather acting as assistants in order to gain their mandated contact hours with students. Does that make sense?

Question: One question does arise re. FAQ 12 which states that “The policy states that internships must be completed during the semester in which the student is enrolled”. I occasionally have students that, for a variety of reasons cannot complete the requisite number of service hours in the semester enrolled. Currently I assign an Incomplete and update that when they finish their intended extent of service, often in summer or winter intersession. Do we have a workaround for that, or does the policy language need to be changed. If not changed, we set students up for Failed grades - it seems to me. At the very least might the language be changed from:

"must be completed during the semester in which the student is enrolled"

to "must be completed during a semester in which the student is enrolled"
Answer from documentation I could find: "The LCs will also verify that internships will be completed during the semester in which the student is enrolled, following standard academic regulations for course enrollments (add/drops, incompletes, and course withdrawals)." Perhaps the current practice can continue based upon this, but I will run it by EPC to double check on this.

Question: What counts as a "secondary site"? If the definition is overly broad, would this make certain kinds of internships essentially impossible to undertake? Let's take an organization that takes as its mission raising awareness about mental health issues in the Latino community. This organization goes to Churches, other non-profits, schools, private homes hosting large events, etc. Sometimes, the exact "sites" it goes to may not be planned out fully until the last minute. Would all of these count as "secondary sites" that would need to be evaluated? More generally, I'm still a little concerned about how internship sites that are not emplaced in a single spot get covered in the policy (they are not virtual sites; they are just nomadic, if you will.).

Question: Relatedly, the policy notes a concern with internships that take place in private homes. How about an internship in something like a Meals on Wheels that involves visits to multiple homes? Apart from the issue of secondary sites, would this kind of internship simply be impossible to undertake now? I'm trying to think of other internships that might involve similar activities (e.g., perhaps internships that involve community organizing activities...).

Question: I'm a little unclear about the driving issue. So, our insurance wouldn't cover an internship in which driving IS the internship (like, a trucking internship or ride-sharing internship?). If an internship involves driving to multiple other sites, would that not be covered? I'm thinking of a "Meals on Wheels" kind of internship where the internship involves good deal of driving, but where driving isn't a substantive part of the learning process (in this case, the substantive components would be the actual home visits as well as the case management work done before or after the visits). And, if the (non-driving) substantive components of the learning could be covered, would that mean that the driving part of the work would not count as a part of the internship itself - i.e., towards the credited hours? That would be unfortunate but understandable.

Insurance:
**Question:** I see no rationale supporting the refusal to accept student self-insurance for out-of-country internships. I have colleagues at other CSUs who tell me that this has been the convention for dealing with student liability in the past. Is there any chance of re-considering that policy? Many valid civil society groups do not carry personal liability insurance, particularly in the developing world.

**Information Request:** GEP asks that EPC review both approved compliant and currently proposed internship policies re. working internationally at other CSUs. Specifically, we want to know if any other CSUs have chosen to accept student purchased personal liability insurance as sufficient to meet liability concerns. We are concerned that the policy as proposed will greatly diminish our Global Studies students' international experience and the degree itself.

I just had a long conversation with the Assistant Direct of CSU International Programs. The IP program is expanding its internship/service learning opportunities. It is going to take a while for them to build it up (they have it now in Ghana and Italy only), but once it's in place, there will be staff at many study abroad destinations identifying internship opportunities and vetting any new opportunities that students uncover. Students within those formal arrangements will be covered under CSU-IP's insurance umbrella. The individual agencies that they intern with will not have to have their own liability coverage.

This will help tremendously. It is also very interesting ......

**Question #1** If CSU-IP can do that overseas, why can't we cover our SSU students -- at least in the local region -- with our insurance?

Next, I asked about IP students who do internships outside of those formal arrangements -- (e.g. in the summer, after the study abroad semester ends). In those situations, we still need a way for students to do internships with organizations that do not have that coverage. We talked about the possibility of students purchasing their own insurance.

She indicated that it is unlikely that we will be able to work with a 3rd party insurer. But, it is quite possible that an arrangement can be made with our current insurance provider. For example, when faculty or grad students go abroad, they have to get extra coverage. That coverage could possibly be extended to students as well - for a price.

Commented [22]: https://drive.google.com/file/d/1lf8Yk1y_YA_gfi725StU3vpELnqS21yn/view

Commented [23]: We are looking into the possibility that students, especially in international internships, can be covered with the special policies we have for off-site academic locations. The short answer from Contracts and Procurement is that students cannot buy insurance coverage of the kind that would suffice to protect the campus, the faculty, and the student. The University cannot cover students at internships with its usual insurance policies, but see below for some special programs that may assist.

Commented [24]: Any additional information on this?
So, question #2. Can our SSU Intern Policy people please look into the possibility of our insurance provider selling insurance to students directly for internships/service learning experiences. I understand that the insurer will have its own set of stipulations for selling those packages. Those organizations may still need to be vetted in some capacity. But, from what I can gather from the CSU IP person, those stipulations are not particularly difficult to meet.

If they say NO, then I would very much appreciate it if you would ask for verification that their answer is consistent across the CSU system.

Faculty Liability:

**Question:** We are not legal experts, but we want to make sure that faculty liability is protected by this policy. If, for example, a student breaks their leg or is harassed by someone at the internship site, we want to make sure that the faculty member of record for the internship is not held liable. Perhaps, a legal expert needs to be consulted directly about this so that the language in the policy fully protects faculty, rather than putting the responsibility on the faculty members to consult about these risks.

Online Safety Evaluation Self-Assessment:

**Questions:** What is the source of the Safety Evaluation Self-Assessment? The questions seem too vague and subjective to provide any kind of meaningful information regarding the safety of the site.

What about internships that are specifically designed to work with criminal and/or behaviorally challenged such as criminal justice and other social service internships? Will all of these be subject to site evaluations?

What is the definition of “behaviorally challenged?”

What does it mean for a known site hazard to be “addressed adequately?”

Commented [25]: This is all about whether students can have their own liability insurance. And if not, who made that final decision- SSU, CSU, ?

Commented [26]: CSU. Student liability insurance does not protect CSU, SSU, or faculty. It might protect the student from legal action against them...

Commented [27]: Faculty cannot write a policy that deems themselves not liable for stuff. The purpose of this policy is to limit faculty and CSU liability- having a campus policy and following it is what limits our liability. Faculty writing a policy and saying we aren't liable does not. Legal is involved in review of this policy.

Commented [28]: We have consulted on multiple occasions with the CSU Office of General Counsel, and the wording of this internship policy has been vetted and approved on at least three occasions. If faculty have followed the policy and site evaluations have been done appropriately, and the student has filled out the appropriate paperwork, then the faculty member is as protected as they can be. Nothing can stop people from suing, but if faculty follow the policy and procedures that have been vetted by legal counsel, then faculty can be represented by the university. It is primarily in not following policy and procedures that there is risk.

Commented [29]: _Marked as resolved_

Commented [30]: _Re-opened_

Commented [31]: It's the form the internship site fills out when they register.

Commented [32]: This was developed by the CO.

Commented [33]: The concern is that the instrument itself does not appear to ask questions that provide enough information for CCE or anyone else to gauge the safety of the site.

Commented [34]: This was developed by the Chancellor's Office to comply with the insurance policy. It's true, it does not determine if the site is safe or not and no sites will be rejected due to the Safety Evaluation Self-Assessment. It determines if no site visit, a virtual site visit, or an in-person site visit is required. Also, I believe this is a question about the process, not a policy question.

Commented [35]: The internship site evaluation is virtual and occurs then the internship fills register and answers the questions on the self-assessment.

Commented [36]: This and the following items are specific to the online safety evaluation self-assessment instrument. The instrument asks specifically about whether students will be working with a "behaviorally challenged population," or those with a criminal background. A majority of internships in Social

Commented [37]: FAQ 25:

25. What is the difference between a site evaluation?

Commented [38]: That is passes the site evaluation.
How will safety/site evaluations be handled for internships that take place in multiple locations that are often spontaneous, such as law enforcement?

Some departments are worried that the process will infringe upon the pedagogy of internships that includes professional development training by requiring students to make and develop their own contacts with community organizations and developing agreements for internships directly with these organizations. How can departments retain this portion of professional training with respect to internships in light of the new policy?

Commented [39]: If I am developing an internship for a student in a distant location (out-of-county, out-of-state, or international), how will I get the site evaluation completed?

Site evaluations occur virtually when organizations register. If a virtual site visit ends up being required for internships in distant locations, the CCE will conduct it. If an in-person site visit ends up being required for internships in distant locations, CCE, faculty, and the site will collaborate to find a possible mechanism. The CCE Director and staff will work with other CSUs, other universities, and appropriate government agencies to answer the questions that will help complete the site evaluation.

For distant locations within California, CCE will also check with other CSU campuses in the area of the organization to see if they have a contract. The contract is between the CSU and the organization, so in that case, we move forward.

How long do site evaluations/visits take and who do I talk to if it is taking too long to get the site evaluation completed.

Site evaluations occur virtually and immediately when the organization registers in SSUEngage. CCE’s timeline for processing site evaluations is ~ 2 working days and processing site evaluations should not take longer than two weeks. If a site visit is required, they usually take less than ½ hour if virtual or a couple of hours if visiting in person. Scheduling virtual and in person site visits depends on the organization’s response time and schedule. Faculty concerned about the length of time for completion of site evaluations/visits should first contact the CCE and find out if there are barriers or roadblocks. If the faculty member is not happy with the progress the CCE is making, faculty may then consult with Academic Programs. If a site visit is required, students are often not prohibited from beginning the internship (see FAQ #25).

Commented [40]: Students can still develop their own contacts and agreements for internships directly with the organization. The organization will need to complete the online safety evaluation self-assessment before the student can begin internship hours at the site.

Commented [41]: I'm not sure what is meant by a student making an agreement? If the student is doing an internship at a site that does not involve a faculty member and course then the policy doesn't apply. Students can find their own internship sites and have them register and work with a faculty member to then set up the learning contract.
If an internship occurs with one umbrella entity but then leads to placement at a secondary site, where does the site evaluation take place?

The determination of appropriate necessary locations of site evaluations will take place by CCE in consultation with the faculty member and/or department. Self-assessment happens at the organization registration step - so the primary site. Once the organization submits the opportunity at a secondary site, CCE staff confirm that all the information in the self-assessment is still accurate. If it's not, it could trigger a site visit and/or contract addendum. This is particularly the case when the secondary site is not simply a different location of an organization with multiple locations, but is with a separate organization. So, for example, if we have a contract with the Santa Rosa School District, having students sent to a different school will likely not trigger a new assessment. But if the City of Santa Rosa refers students to the local Boys & Girls Club, we will need a separate registration/contract with the Boys & Girls Club. This is not uncommon.

The issue is of concern here is not a secondary site in the sense of the example you mentioned above. Instead, it is a concern about how the policy will impact internships which spontaneously take students off the primary site (as in visiting churches, non-profits, schools, etc.) An example is an organization aimed at raising community awareness about an important social issue, or law enforcement agencies who constantly move from site to site.

Let’s imagine that a student has a "nutrition case management internship" with the Council on Aging. One component of this internship is the delivery of meals (+ evaluating nutritional concerns, taking notes on the "case" in the style of a social worker, etc.). My understanding is that this component of the internship would be possible to do so long 1) the student is not driving; and 2) the student is accompanied by a supervisor. Am I understanding that correctly? If so, would the senior's house count as a "secondary site" that would need to be evaluated? It's not exactly a "spontaneous" site, but it's not a primary one either.

I'm harping on this internship experience b/c we have had students do this, and it was a really rich experience for them (and, in one case, led to a student accepting a job as a case management social worker with the Council on Aging). It's an internship that also (I hope) helps to clarify some of the details of the internship policy.

"Secondary sites" are additional sites managed by the same entity. Many organizations have multiple locations and sites or partner closely with others. As far as I know, private homes are almost never acceptable sites for internships. There are other CSUs that have had to end long time partnerships due to students being expected to be in private homes. Virtually no private home will have the liability insurance necessary for a contract as required to be compliant with the internship insurance policy. However, there are some credential programs that require students complete home visits. These are usually in one of the fields (nursing, social work, education) that has a different insurance policy than the one we have for insurance for internships. Perhaps there's a way for the Council on Aging to do an addendum to the contract that allows them to take legal responsibility for the home visits, and if there were no other way for the students to learn what the faculty member wants them to learn without a home visit, I would work with Contracts & Procurement and the Council on Aging to explore this possibility. Is
there a place in the policy you can point me to that is related to the issue of home visits?

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Thanks, Merith. It isn't mentioned explicitly in the policy. However, this concern stems from the item in the policy that requires a safety evaluation of the site "A. Site Evaluation/Visit 1. A Safety Evaluation must be completed by the CCE prior to students beginning internships at a site.

The concern is not specific to personal homes, that is just one example provided. There are others provided above that haven't been addressed yet. For example, does the policy prohibit a student who is interning at a community agency in a particular office that has been approved through a safety evaluation and is asked in the course of the internship to go visit a local community center or church in the context of the internship from doing so unless the community center or church has previously passed a safety evaluation? These are things that many social science interns are asked to do frequently so it will have a pretty big impact on the curriculum in certain departments if internships of this nature will have to be abandoned as a result of this policy.

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I think this raises a good point and makes me think about how we have to remember the point of the policy. There is no getting around the safety evaluations - we have to have them. We also have to have a policy- there is no getting around that. I think we have to remember- it is not our specific policy that will prohibit internships. The policy just says how the internships get set up. If internships can’t pass a safety evaluation- It is because they aren’t safe, not because we have a policy saying we have to do them. Maybe there is wiggle room in what is permissible and what isn’t- although it sounds like the safety evaluation comes from the CO. Any thoughts on that +merith.weisman@sonoma.edu?

Not passing a policy because we think it will prohibit certain types of internships will not protect anyone- it just makes the risk worse. It seems more feasible to pass a policy- and if an internship can’t pass the safety evaluation, we figure out how we can make it work- like following Merith’s alternate suggestion. But right now, the CO is requiring us to have safety evaluations and to have a policy that explains how we set up internships. We aren’t doing this.

I’m not sure how to change people’s perspective on what the point and scope of the policy is. It’s really small- we have to have a policy that says how we set up internships. The policy doesn’t say much about internship requirements at all.

<table>
<thead>
<tr>
<th>Name</th>
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<th>Time</th>
</tr>
</thead>
<tbody>
<tr>
<td>Merith Weisman</td>
<td><a href="mailto:Merith.Weisman@sonoma.edu">Merith.Weisman@sonoma.edu</a></td>
<td>4/10/20 3:10:00 PM</td>
</tr>
</tbody>
</table>

Thanks for this reminder, Jenn. We can't make the safety evaluation more flexible and in all likelihood, it will be tighter in the future, not looser. Other CSUs that have had their risk management process audited by the CO have had to add additional questions. I looked at those new questions to see if we should just include them from the beginning but I feel that other steps in our process address those questions and that those questions are about specific opportunities not organizations.

I do think the question about secondary sites is important. I am reaching out to a few counterparts who have been audited to find out how they handle this. I don't know more than what I've shared so I'll let you know what I learn.

<table>
<thead>
<tr>
<th>Name</th>
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<th>Time</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jennifer Lillig</td>
<td><a href="mailto:Jennifer.Lillig@sonoma.edu">Jennifer.Lillig@sonoma.edu</a></td>
<td>2/27/20 2:18:00 PM</td>
</tr>
</tbody>
</table>

Can students drive as part of their internship?
Students driving to their internship is permitted but student driving as the internship itself is not permitted by the insurance policy.

The distinction is this:
--Driving TO an internship site or even multiple internship sites is fine
--Driving AS an internship—in which there is no site—is not OK. Jobs should be distinguished from internships. Driving a truck is a job. If a student is riding along in a truck because the trucking company wants someone to measure efficiencies or driver attitudes, I think we need to address those issues via the contract. "Meals on Wheels" internships should not have the student driving to deliver the meals nor should the student be in the house with a client unsupervised. Both are safety issues that are part of risk management. Any special circumstances should be addressed as part of the contractual process. The CCE could help faculty navigate that contractual process with Contracts and Procurement and would do the site evaluation.

This and the following items are specific to the online safety evaluation self-assessment instrument. The instrument asks specifically about whether students will be working with a "behaviorally challenged population," or those with a criminal background. A majority of internships in Social Sciences work specifically with these kinds of populations so faculty are concerned that this will trigger automatic site visits that cause a delay in processing both by CCE and on-site agencies.

FAQ 25:

25. What is the difference between a site evaluation and a site visit?

FAQ 19:

When are site visits required?
Recommendations and Additional Information for Departmental Internship Policies

An academic Department or School may implement a program-specific internship policy. The policy must include, at a minimum the content the campus Internship Policy and it must be published in the Catalog and on the program’s website. Additional areas addressed in program-specific internship policies may include:

- Whether and in what way internships are required for a degree in a given major
- Guidelines for the transfer of internship units earned elsewhere and the way in which they satisfy major unit and course requirements
- The requirements necessary to satisfy more than one internship under the same course number
- The number of internship units permitted in a major
- Grading options applicable to internships
- Whether internship credit is appropriate in an organization where a student is already employed
- Whether internships involving a potential conflict of interest (such as working in a small family business) are appropriate
- Special requirements for internships

Information about International Internships

- Domestic students interning abroad must be directed to obtain insurance information from the Center for International Education.
- International students in either F-1 or J-1 visa status must be directed to obtain the appropriate work authorization prior to accepting a paid internship off-campus. Even if the work is unpaid, international students must consult with their Designated School Official (DSO) or Alternate Responsible Officer (ARO) in the Center for International Education before working off-campus.

Information for on-campus paid interns

- Students participating in paid on-campus internships must not exceed 20 hours/week of work, inclusive of any other on-campus paid positions.
Internship Policy and Process FAQs

Click on the links below to jump to the FAQ answer:

1. **What does the Internship Policy do and not do?**
2. **If there is an accident, incident, or problem with an internship student can the faculty supervisor be held responsible?**
3. **What is the difference between internships and service learning opportunities in a course?**
4. **Has Procurement and Risk Management reviewed the latest version of the policy?**
5. **Can an academic department develop its own internship policy, and what is the relationship of that policy to the institutional one? What is the risk of faculty for these departmental policies?**
6. **Can departments assess the risk associated with internships on their own?**
7. **Will campus policies prevent my department from running internships the way we always have?**
8. **What kind of insurance is required for an internship site to be approved?**
9. **If I am developing an internship for a student in a distant location (out-of-county, out-of-state, or international), how will I get the site evaluation completed?**
10. **How long do site evaluations/visits take and who do I talk to if it is taking too long to get the site evaluation completed.**
11. **What is SSU Engage?**
12. **Can a student complete an internship over the summer? If so, for which semester is the student enrolled and paying tuition?**
13. **What happens if some of the work for an internship falls between semesters (fall, spring, summer)?**
14. **What is the difference between off-campus research and internships?**
15. **If an internship occurs with one umbrella entity but then leads to placement at a secondary site, where does the site evaluation take place?**
16. **Can students drive as part of their internship?**
17. **If an internship is primarily done on-line or in a virtual environment, do site evaluation have to be done?**
18. **Where will internship documentation be stored?**
19. **When are site visits required?**
20. **If internship sites have accessibility restrictions (i.e. field sites that are not wheelchair accessible) will they be prevented to become an internship site since they aren’t accessible to everyone?**
21. **What is the timeline for implementation of the new processes associated with the Internship Policy?**
22. **Do students have to release their images in order to participate in an internship?**
23. **What are the workload implications for faculty?**
24. **If a student is hired into an externship and paid by the site while also enrolled in an academic course with a faculty member, does this policy still apply?**
25. **What is the difference between a site evaluation and a site visit?**
What does the Internship Policy do and not do?

a. The Internship Policy governs academic internships at Sonoma State in relationship to CSU regulations (E.O. 1064) and state regulations (Title V). The policy provides definitions and explains the roles held by faculty, the Center for Community Engagement, and the University regarding internships.
b. The Policy does not address operational or procedural concerns for faculty, staff, or students.
c. The Policy is not the university insurance policy and, by itself, will not keep faculty from being held responsible for accidents, incidents, or problems that occur with students in internships.

If there is an accident, incident, or problem with an intern, can the faculty supervisor be held responsible?

The CSU maintains a system-wide insurance policy, which helps mitigate risk for faculty, staff, students, and the university related to internships. The insurance policy works when the institution has done what it can to minimize risk. This includes having an approved policy compliant with EO 1064 and defined procedures. Faculty and staff minimize risk to themselves and students by following the policy and procedures. Interested faculty can also contact CFA for additional insurance options.

What is the difference between internships and service-learning opportunities in a course?

Internships are specifically defined in the Internship Policy, and opportunities that do not meet the definition are not classified as internships for the purpose of this policy. Service-learning opportunities are specifically defined in the SSU Service-Learning Guidelines (Link to Service-Learning Guidelines https://cce.sonoma.edu/faculty/what-service-learning) approved by the Academic Senate in 2005.

Has Procurement and Risk Management reviewed the latest version of the policy?

Yes, Procurement and Risk Management have reviewed the policy and have made suggestions for changes that have been incorporated into this version of the policy. They made minimal changes to clarify language already used.

Can an academic department develop its own internship policy, and what is the relationship of that policy to the institutional one? What is the risk of faculty for these departmental policies?

Yes, a department can develop its own internship policy, and departments are encouraged to do so (see Departmental Guidelines for Internship Policies). Departmental policies must adhere to the SSU Internship Policy and Procedures but may
also include details such as the contributions of internships to degree programs, departmental requirements for student internships, etc.

Provided the departmental policy does not violate the SSU Internship Policy and Procedures and provided faculty follow the agreed upon policies and procedures, faculty are protected by the CSU insurance policy, as stated above, and are entitled to representation by CSU Legal Counsel. Faculty can also obtain their own private counsel at their own cost. EPC and Academic Programs can provide guidance to departments developing internship policies to ensure adherence to the university policy.

**Can departments assess the risk associated with internships on their own?**

Departments can certainly provide guidance on risk during the risk assessment process, but risk assessment is a campus process and must be governed by the SSU Internship Policy and Procedures. Risk assessment is done at the campus level by the Center for Community Engagement in cooperation with the SSU Office of Risk Management. Some CSUs do provide training to faculty for site visits, usually for international site visits when a faculty member is already visiting the location. If a site visit is required for a case like this, faculty can address questions to CCE or Academic Programs.

**Will campus policies prevent my department from running internships the way we always have?**

Yes, potentially. If an internship fails to meet the minimum requirements of the campus policies and procedures, Academic Programs and the CCE will work with departments to assess risk and find ways to bring the internship into compliance without sacrificing faculty objectives or the integrity of the experience for students.

**What kind of insurance is required for an internship site to be approved?**

The internship site must have liability insurance. [Link to request for Proof of Insurance](https://drive.google.com/file/d/1l18Yk1y_YA_g6g72SsD_3vpELnqS21yn/view?usp=sharing). Student insurance will not suffice. It is the site itself that is responsible for the student’s health and safety during the internship. Contracts & Procurement will assess the proof of insurance and determine whether it meets legal requirements.

**If I am developing an internship for a student in a distant location (out-of-county, out-of-state, or international), how will I get the site evaluation completed?**

Site evaluations occur virtually when organizations register. If a virtual site visit ends up being required for internships in distant locations, the CCE will conduct it. If an in-person site visit ends up being required for internships in distant locations, CCE, faculty, and the site will collaborate to find a possible mechanism. The CCE Director and staff will work
with other CSUs, other universities, and appropriate government agencies to answer the questions that will help complete the site evaluation.

For distant locations within California, CCE will also check with other CSU campuses in the area of the organization to see if they have a contract. The contract is between the CSU and the organization, so in that case, we move forward.

**How long do site evaluations/visits take and who do I talk to if it is taking too long to get the site evaluation completed.**

Site evaluations occur virtually and immediately when the organization registers in SSUEngage. CCE’s timeline for processing site evaluations is ~ 2 working days and processing site evaluations should not take longer than two weeks. If a site visit is required, they usually take less <½ hour if virtual or a couple of hours if visiting in person. Scheduling virtual and in person site visits depends on the organization’s response time and schedule. Faculty concerned about the length of time for completion of site evaluations/visits should first contact the CCE and find out if there are barriers or roadblocks. If the faculty member is not happy with the progress the CCE is making, faculty may then consult with Academic Programs. If a site visit is required, students are often not prohibited from beginning the internship (see FAQ #25).

**What is SSU Engage?**

SSU Engage is the current software program utilized by students, faculty, and community partners to manage the risk management process for internships and other forms of community involvement. (See the Internship Process document.)

**Can a student complete an internship over the summer? If so, for which semester is the student enrolled and paying tuition?**

Yes, students can complete internships over the summer, and the internship courses may be developed on state-side funding or in self-support. The policy states that internships must be completed during the semester in which the student is enrolled. Summer state-side funding models are being developed in spring 2020 and will be available as soon as possible. Self-support funding models are developed by the School of Extended and International Education.

**What happens if some of the work for an internship falls between semesters (fall, spring, summer)?**

There are times when an internship starts or finishes between semesters. The student must be enrolled in the semester in which most of the internship is scheduled.

**What is the difference between off-campus research and internships?**
Off-campus student research, done for the student’s own interests in fulfillment of degree requirements, is not covered by the SSU Internship Policy. Research done on behalf of a community partner may be covered by the SSU Internship Policy. Faculty may make a determination about whether a project is covered by the SSU Internship Policy in conjunction with the CCE and Academic Programs.

If an internship occurs with one umbrella entity but then leads to placement at a secondary site, where does the site evaluation take place?

The determination of appropriate necessary locations of site evaluations will take place by CCE in consultation with the faculty member and/or department. Self-assessment happens at the organization registration step - so the primary site. Once the organization submits the opportunity at a secondary site, CCE staff confirm that all the information in the self-assessment is still accurate. If it's not, it could trigger a site visit and/or contract addendum. This is particularly the case when the secondary site is not simply a different location of an organization with multiple locations, but is with a separate organization. So, for example, if we have a contract with the Santa Rosa School District, having students sent to a different school will likely not trigger a new assessment. But if the City of Santa Rosa refers students to the local Boys & Girls Club, we will need a separate registration/contract with the Boys & Girls Club. This is not uncommon.

Can students drive as part of their internship?

Students driving to their internship is permitted but student driving as the internship itself is not permitted by the insurance policy.

If an internship is primarily done on-line or in a virtual environment, does a site evaluation have to be done?

The organization has to register in SSUEngage to offer an internship opportunity and the organization does a self-assessment of risk as part of that registration. Their answers on that self-assessment determine whether there needs to be a site visit. If a site visit is required, the location of where the student performs the work of the internship would be discussed during that conversation. In general, risk management requires that meetings with students do not occur at private homes or in private locations to protect the student and the community partner. If the same community partner offers a different kind of internship opportunity that is not virtual, the self-assessment may be voided and must completed again.

Where will internship documentation be stored?

Documents will be stored in accordance with EO 1031. Currently, copies of the CSU Release of Liability are required to be attached to the Learning Contract for internships and saved for three years, preferably digitally. Academic Programs and CCE are working together to establish automated electronic storage options.
When are site visits required?

Site visits are only necessary when there is a concern that arises in the safety evaluation that the organization completes when they register in SSUEngage. Otherwise, there is no site visit. Most of the required site visits can be performed virtually via Zoom. Other CSUs report few necessary site visits and very few that must be completed before the student starts working at the organization. In the case of a concern that warrants an in-person site visit, the CCE will check with other CSU campuses in the area of the organization (if applicable) to see if they have a contract. The contract is between the CSU and the organization, so in that case, we move forward.

If there is no CSU contract/contract at another campus, CCE will work with the faculty member to schedule any required in-person site visit and determine the process to take place as quickly as possible. For organizations that students can't attend until the site visits have been conducted and issues have been addressed, students will not be able to participate in an internship. According to other CSUs this is very rare. Regardless of location, all site visits will be considered time-sensitive.

If internship sites have accessibility restrictions (i.e. field sites that are not wheelchair accessible) will they be prevented to become an internship site since they aren’t accessible to everyone?

From the policy: Faculty are responsible for ensuring that if a qualified intern with a verified disability identifies the need for an accommodation. The site, in collaboration with SSU Disability Services for Students (DSS) and the faculty member, should provide an accommodation that will allow the individual equal access to perform the essential functions of the position.

What is the timeline for implementation of the new processes associated with the Internship Policy?

Implementation of new processes will take place over a three-year time period to bring already established internships into compliance and address any problems with certifying new internship sites. It is hoped that the slow rollout coupled with proper messaging to departments, faculty, staff, students, and current partner organizations will help with avoiding confusion. Additionally, it gives space to address problems and glitches as they occur.

Do students have to release their images in order to participate in an internship?

No. There is a yes/no check-box on the form.

What are the workload implications for faculty?

Faculty working with current internship sites may need to inform the site and new students of the new registration process with SSUEngage. If current internship sites do not meet the minimum requirements, CCE will work with them to address issues. If sites do not wish to comply with minimal requirements, faculty may need to modify their internship. CCE will perform any necessary virtual site visits regardless of location and
any necessary in-person site visits in Sonoma County and work with colleagues and faculty if necessary in other locations. It is hoped that the three-year roll-out will help to mitigate faculty workload during the transition. General faculty workload considerations for internships are governed by the CS number and CBA.

If a student is hired into an internship and paid by the site while also enrolled in an academic course with a faculty member, does this policy still apply?

In some cases. Internships are defined specifically in the policy and pay is not a deciding factor. However, in some specific cases (such as those found in nursing and education) these opportunities are covered by a different policy and insurance mechanism (see first paragraph of policy Section III). If you are unclear if your student opportunities may fall into one of these special categories, you can check with CCE or Academic Programs. It may even be that your student opportunity is just a normal class and options like the Field Trip policy could suffice.

What is the difference between a site evaluation and a site visit?

Site evaluations take place virtually when an organization registers to provide internships. Site visits may be triggered when there are safety concerns. A site visit includes a conversation either virtually or in person to determine what may or may not need to be done to make the site and all opportunities safe for the students. Some site visits do not need to be completed before an internship begins but must be completed within 6 months. Whether this is difficult to accomplish is difficult to assess since we haven’t been compliant with the EO yet.
Internship Learning Contract

Section I: Student Data

Student’s Name: _____________________________________________________________

Email: __________________________ Telephone Number: _________________________

Section II: Site

Site: ___________________________________________________________________________

Contact Name: _____________________________________________________________________

Address: ___________________________________________________________________________

Email: __________________________ Telephone Number: _________________________

Section III: Course Data

Year/Semester __________________________ Course Title: _________________________

Faculty Name: __________________________

Learning Activity (list your primary responsibilities at the Site):

Learning Outcomes – Through this course, students will:
   1. Integrate academic study with practical experience in a cooperating organization
   2.
   3.

Planned Number of Units: _______ Start Date: _______ End Date: _______

Section IV: Internship Oversight
Plan for evaluating progress on learning goals
________________________________________________________________________________________
________________________________________________________________________________________
________________________________________________________________________________________

Plan for collecting and reviewing evaluations by the students
________________________________________________________________________________________
________________________________________________________________________________________
________________________________________________________________________________________

Plan for collecting and reviewing evaluations by on-site supervisors
________________________________________________________________________________________
________________________________________________________________________________________
________________________________________________________________________________________

Section V: Signatures

I will devote approximately _____ hours per week towards completion of the responsibilities and learning objectives listed above for a total of _______ hours, effective from __________ to __________ (“learning activity”). I agree to complete any paperwork and orientations required by my professor or site supervisor as part of this learning activity.

I have read, understand and agree to comply with these guidelines.

Student Signature: _____________________________________________ Date: ______

Student Name (please print): ____________________________________

Learning Site Supervisor Signature: _______________________________ Date: ______

Learning Site Supervisor Name (please print): ______________________

Faculty Signature: _____________________________________________ Date: ______

Faculty Name (please print): ____________________________________

If student is under the age of 18 please complete

Parent/Guardian Name: _________________________________________ Date: ______

Parent/Guardian Signature: ____________________________________

Attach CSU Release of Liability form
Submit to Department and CCE
SSU Risk Management Process

Students

I Student Registration (happens once)
   A. Students Register in SSU Engage
   B. Registration includes verification of being 18+. If they are 18+, complete items in IC. If not, skip to II. SSU Engage will prompt them to complete items in IC the next time they login after they’re 18. Students who are under 18 can begin community-based work without completing items in IC.
   C. Students watch safety videos and digitally sign and submit documents:

II Student Opportunity Identification (happens as many times as necessary)
   A. Internships/CIP
      a. Departments/Faculty provide list of acceptable placements or students access similar information in SSUEngage.
      b. Completion of Internship Learning Contract with faculty.
      c. Students pursue placement in a faculty selected site or through SSU Engage. If SSU Engage, see III.
      d. See III
   B. Service-Learning
      a. Faculty outlines service-learning goals leading to development of community involvement experiences in syllabus.
      b. See III
   C. Co-curricular
      a. See III

III Student Opportunity Application and Progress (happens as many times as necessary)
   A. Students apply to opportunities in SSUEngage.
   B. Students are interviewed/assessed by organizations.
   C. Students may or may not receive a placement offer.
   D. Students digitally submit CSU Release of Liability Form.
   E. If placed, students submit progress reports and hours through SSUEngage.
SSU Risk Management Process

Organizations

I Departments Submit List of Organizations to CCE
   A. Departments provide existing agreements to CCE
   B. CCE enters department identified organizations in SSUEngage
   C. CCE requests copies of contracts from CSU’s in other parts of California for organizations in their areas

II Organizations submit SSUEngage registration, including completion of **Safety Evaluation Self Assessment**
   A. CCE Reviews safety evaluation through safety evaluation rubric (internal). There are five possible results (IIAa.-IIAc)
      a. No site visit required. Placements may begin.
         i. CCE sends agreement
            1. Organization signs agreement
               a. CCE collects wet signature
                  i. CCE provides original document to Procurement for execution
                  ii. Organization orients students
                  iii. Organization evaluates students
            2. Organization wants to negotiate terms
               a. Procurement reviews and executes modified terms
         ii. CCE requests and collects insurance documents
            1. Insurance is adequate
               a. CCE provides to Procurement for execution
            2. Insurance is not adequate
               a. CCE sends to Procurement for negotiation
      b. Placements may begin conditionally
         i. Within 6 months, CCE conducts a virtual site visit
            1. Affirmative assessment > process can begin at IIAai
            2. Negative assessment > CCE sends rejection letter to organization and faculty
      c. Placements may begin conditionally
         i. Within 6 months, CCE conducts an -in-person site visit to Sonoma County organizations
            1. Affirmative assessment > process can begin at IIAai
            2. Negative assessment > CCE sends rejection letter to organization and faculty
      d. Placements may not begin until completion of virtual site visit
         i. CCE conducts virtual site visit
            1. Affirmative assessment > process can begin at IIAai
            2. Negative assessment > CCE sends rejection letter to organization and faculty
      e. Placements may not begin until completion of in-person site visit
         i. CCE conducts site visit to Sonoma County organizations
            1. Affirmative assessment > process can begin at IIAai
SSU Risk Management Process

2. Negative assessment > CCE sends rejection letter to organization and faculty
SSU Risk Management Process

Departments/Faculty

I CCE/ SSUEngage Process
   A. Departments/Faculty provide CCE with list of organizations to begin risk management process
   B. At beginning of each semester, Departments/Faculty verify list of approved organizations in SSUEngage
   C. Departments/Faculty require students to register or login to SSUEngage and to identify potential organizations from faculty approved list in SSUEngage.
   D. Departments/Faculty electronically store completed CSU Release of Liability form with syllabus/Internship Learning Contract

II Temporary faculty-led risk management process for departments with current contracts through procurement only and for up to 24 months only
   A. Students/Faculty/Departments work with procurement
      a. Although students may identify potential organizations, faculty/departments must approve prior to placement.
   B. Faculty/Departments verify status of paperwork with CCE
      a. This step may determine that all paperwork has been completed.
   C. Faculty/Departments provide students with list of approved organizations
   D. Departments/faculty provide and collect documents from students:
      a. Visual/Audio Image Release Form
      b. CSU Release of Liability Form
      c. Student Community Engagement Agreement
   E. Departments/faculty keep documents in IID with syllabus/Internship Learning Contract for 3 years.

III Process to address faculty concerns with safety evaluation/site visit
   A. Faculty concerned that an ongoing safety evaluation or possible site visit timeline may or is interfering with the ability of a student to register for or participate in an opportunity should first consult with the director of the CCE to identify the source of the delay (organization registration process, slow communication amongst relevant parties, unresolved safety concerns, difficulty in arranging a required site visit, etc.).
   B. If the delay cannot be remedied, the faculty member should report their concern to EPC who will then work with Academic Programs, the CCE, and the Offices of Risk Management/Contracts and Procurement, to discuss possible remedies and process modifications.
<table>
<thead>
<tr>
<th>Types of Community Engaged Experiential Education</th>
<th>Definition</th>
<th>Time Commitment</th>
<th>Student Compensation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Service Learning</td>
<td>Service-learning is a pedagogy that utilizes community service projects within the context of an academic course.</td>
<td>Depends on the academic and civic learning goals of the course and needs of the community partner(s).</td>
<td>unpaid</td>
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<tr>
<td>Internships</td>
<td>An internship is a credit-bearing on-the-job experience at an on- or off-campus work setting directly related to career interests and major field of study.</td>
<td>45 hours/unit</td>
<td>Non-profit, governmental organizations, or common good issue, on or off-campus -- paid or unpaid</td>
</tr>
<tr>
<td>Community Involvement Program (CIP)</td>
<td>Performing some service or good work in exchange for academic credit.</td>
<td>45 hours/unit</td>
<td>unpaid</td>
</tr>
<tr>
<td>Off-Campus Class Project</td>
<td>Visit and/or consult with an off-campus entity for a class assignment or project.</td>
<td>Determined by faculty</td>
<td>Non-profit, governmental organizations, or common good issue, on or off-campus -- paid or unpaid</td>
</tr>
<tr>
<td>Volunteer Community Service</td>
<td>Performing some service or good work, of own free will.</td>
<td>Determined by student volunteer</td>
<td>unpaid</td>
</tr>
</tbody>
</table>

**Academic**

- **Service Learning**
- **Internships**
- **Community Involvement Program (CIP)**
- **Off-Campus Class Project**
- **Volunteer Community Service**

**Addressed by Internship Policy**
<table>
<thead>
<tr>
<th>Types of Community Partners or Placements</th>
<th>For Profit - paid except when they meet all 6 criteria set by the US Department of Labor</th>
<th>For Profit - paid except when they meet all 6 criteria set by the US Department of Labor</th>
<th>For Profit - paid except when they meet all 6 criteria set by the US Department of Labor</th>
<th>Non-profit, governmental organizations, or common good issue, on or off-campus</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-profit, governmental organizations, or common good issue, on or off-campus</td>
<td>1. Non-profit, governmental organizations, or common good issue, on or off-campus 2. For Profit</td>
<td>Off-campus non-profit or governmental organizations</td>
<td>1. Non-profit, governmental organizations, or common good issue, on or off-campus 2. For Profit</td>
<td>Non-profit, governmental organizations, or common good issue, on or off-campus</td>
</tr>
<tr>
<td>Reciprocal relationship in which student and community partner benefit equally.</td>
<td>Primarily the student</td>
<td>Primarily community partner</td>
<td>Primarily the student</td>
<td>Primarily community partner</td>
</tr>
<tr>
<td>Student academic learning student civic learning impact on community partner</td>
<td>Academic learning and student career preparation</td>
<td>Value to community partner</td>
<td>Course learning goals</td>
<td>Value to community partner</td>
</tr>
<tr>
<td>The community experience is a component of an academic course, used as a &quot;text&quot; for student learning. Service-learning projects are designed in partnership with community to meet an expressed community need.</td>
<td>Determined by Academic Department.</td>
<td>Determined by Academic Department. Many departments do not offer CIP.</td>
<td>Determined by faculty member</td>
<td>N/A</td>
</tr>
</tbody>
</table>
A structured reflection activity is utilized to help students understand how their community experiences link with the academic and civic learning objectives of the course.

<table>
<thead>
<tr>
<th>Process</th>
<th>Faculty connect with community partner to develop projects. CCE can provide guidance and connections to CBOs.</th>
<th>Students find internship placements through their department, CCE, or on their own.</th>
<th>Students find opportunities through JUMP or on their own.</th>
<th>Determined by faculty member</th>
<th>Students find opportunities through JUMP or on their own</th>
</tr>
</thead>
<tbody>
<tr>
<td>Risk Management</td>
<td>Agreement between organization and SSU required. See Process.</td>
<td>Agreement between organization and SSU required. See Process.</td>
<td>Agreement between organization and SSU required. See Process.</td>
<td>Follow Field Trip Procedure</td>
<td>???</td>
</tr>
</tbody>
</table>

Adapted from [CSU Bakersfield Center for Community Engagement and Career Education](https://bakersfield.csu.edu/community-engagement-career-education)