

There has been a significant increase over the past few years in the number of faculty and employees taking students abroad under the auspices of their work at CSU. Determining whether or not the activity is an official function is of critical importance for the protection of the faculty taking the students abroad, and for protecting the university from liability exposure. There have also been significant changes in national expectations and standards to which universities are being held for due diligence on programs they are sponsoring abroad. The ultimate goal of OIP's effort is to protect our students and employees.

This policy has been developed with and reviewed by Risk Management, Legal Counsel and the Provost's office, and it is being taken to VPOF by the Associate Provost for International Programs. We provide it to you, below, with some explanation of how to go about requesting clarification on whether or not an activity abroad is, in fact, a CSU activity. Please read it carefully and contact us if you have any questions. We are happy to answer questions you might have about your activities.

Office of International Programs  
[www.international.colostate.edu](http://www.international.colostate.edu)

### **Policy Statement on CSU Personnel Traveling Abroad With Colorado State University Students:**

**Any CSU faculty or staff member traveling abroad with CSU students for educational, research, or work-related purposes must work with the Office of International Programs and related offices to determine whether the program they are proposing falls under the aegis of CSU, and if applicable, meets the normal university guidelines for programs that involve taking students abroad. CSU employees working through third party providers of programs to take students abroad, as well as employees taking non-students abroad on CSU-related programs, must also have the proposed program reviewed through International Programs.**

### **Background**

CSU wishes to encourage faculty and staff to be involved in creating educational experiences abroad for students. Nationally and internationally accepted standards of good practice and the imperative to protect students from harm make it necessary to assure that due diligence has been given to the design and execution of these programs. State and university laws and regulations that govern conflicts of interest, financial and privacy matters must also be considered. Employees must also be concerned about not creating personal liability by conducting programs that are not consistent with institutional policies, or that take place while they are not on contract.

This policy statement is offered to provide guidance in how programs are to be processed within the university, and how to determine the placement and level of responsibility that accrues to the institution and/or the employee. Of particular concern are programs that target and advertise to CSU students, but are being organized by or at the initiation of employees who might consider it a "private" activity rather than CSU-related activity. This is an area of ambiguity that requires vetting by the appropriate CSU offices for the protection of the student, the employee and the institution.

This policy statement asks that programs taking students/participants abroad for educational, research or work-related purposes be processed with International Programs prior to initiation and before advertising or enrolling students/participants to be sure that university interests are protected, that financial and legal guidelines are followed and that the university is clear about the nature of the activity that the employee is undertaking. This review will enable the employee to move ahead with confidence knowing that they have followed the procedures in place for international programs, and to be clear about the degree of personal liability they may be assuming.

OIP staff will consult with the person(s) proposing the program at any stage in the process so they are clear about how to proceed, and so they can tailor the program to meet institutional guidelines if the

program is determined to be affiliated with CSU. Employees requesting a review are encouraged to discuss their plans and get approval from the administrative head of their unit before taking the proposal to OIP for final review.

International travel and study programs will have lead times and requirements that vary depending upon the nature and location of the program and the requirements associated with that type of program. Please go to the international programs website for additional information. International Field Experience guidelines can be found under "International Education."

### **Procedures for Processing Proposals for CSU Programs Abroad:**

1. Contact the Office of International Programs (OIP) at (970) 491-5917 to discuss the program you are considering: ask for the Director of Study Abroad (Kara Bingham) if this is a formal study abroad program. Ask for the Director of International Education (Martha Denney) if this is a faculty effort that is taking or sending student abroad through means other than a program that is being facilitated by the CSU study abroad program (internship, practicum, research, etc.)

2. If the program that you propose has educational, research or work-related aspects you will be asked to process your program through the Office of International Programs following guidelines that are in place for institutionally-sponsored programs. CSU-sponsored programs require the approval of the head of the academic or administrative unit sponsoring the program, as well as OIP. CSU generally does not sponsor travel that does not have an academic or work-related component. CSU-sponsored programs require basic documentation and release forms signed by participants- student and non-student.

Examples of questions that, if answered affirmatively, would indicate a relationship to CSU:

- Am I providing funds to the student/participant through any CSU-related activity (e.g. research grants, etc.)?
- Is CSU's name associated with this effort in any way?
- Am I accompanying the student/participant on this activity?
- Did I approve or sign off on this activity (e.g. internship) for this student/participant?
- Is the student getting credit for this activity?
- Is this activity required for the student to complete a degree or program?
- Have I advertised this opportunity to students at CSU?
- Does this appear to be related to CSU in any way? How would the students or parents/guardians answer this question?

3. If the program proposed is not directly related to CSU's mission but you plan to take CSU students/participants with you, you will be asked to provide information justifying your proposal, including information about your relationship to the university during your proposed program, who you are targeting as participants, what the overall goal of the program is, and how the proposed program will be organized, processed and advertised.

4. If OIP is not able to determine how the program should be handled from the information provided, they will ask other interested CSU offices for help in assessing the procedures that should be used in to determine the relationship of the proposed program to the institution. These offices may include, but are not limited to, the Department Head and Dean or Administrative Head, Business and Financial Services, Risk Management, Legal Counsel, and the Office of the Provost.

5. If it appears that a conflict of interest situation exists, the person proposing the program will be asked to justify the program and present information that would assist the interested institutional parties in making a determination about how the program is to be handled, and whether or not it can have any relationship to the university.

6. The Office of the Provost (Vice Provost for Faculty and Academic Affairs) must approve all international travel, and all employees must have a signed travel document on file even if there is no

direct cost to the institution. (Note: This is not a new policy, however it has sometimes been overlooked because the travel document may be perceived as being tied exclusively to the financial approval process- this is not the case.)