

Office of Internal Audit



Program Review

**Student Health and Safety in UW International
Education Programs**

February 2001

TABLE OF CONTENTS

	Page
Executive Summary	i
Scope of Review	1
Background	1
Increased Participation in International Education	1
Incidents in Other Institutions' International Education Programs	2
Discussion and Recommendations	3
Overview of UW International Education Programs	4
Types of UW International Education Programs	4
Study Abroad Programs	4
Exchange Programs	5
Short-term Study Tour Programs	6
Program Expenditures and Student Costs	6
Strategies for Protecting Student Health and Safety	7
Guidelines for Protecting Students	8
Academic Information Series Guidelines	8
National Best-Practice Guidelines	8
Advance Assessment of Health and Safety Issues	9
Health and Safety Issues Screening	11
Orientation	12
Responsibility for Student Health and Safety Problems	14
Release and Disclaimer Forms	15
Insurance	16
Contingency Fund	18
Managing Emergencies	20
Program Administration	20
Administrative Oversight	20
Contracts	21
Program Evaluation and Incident Reporting	23
Financial Management	24
Conclusion	25
Bibliography	27

EXECUTIVE SUMMARY

UW System institutions offer study abroad programs, exchange programs, and short-term study tour programs. The UW System offered approximately 150 programs in 45 countries during the 1998-99 academic year. Institutions reported expenditures of \$13.4 million in fiscal year (FY) 1999 and \$15.4 million in FY 2000. Approximately 3,100 UW students participated in UW international education programs during the 1999-00 academic year.

Study abroad programs have been the subject of recent attention. Increasing the number of students who participate in international education has been a goal at both the state and federal levels. At the same time, several students have been injured or killed during programs sponsored by institutions here and in other states. In light of the recent focus on study abroad, the University of Wisconsin System Office of Internal Audit reviewed efforts to protect the health and safety of students in UW System international education programs.

The UW System Academic Information Series includes guidelines intended to help protect the health and safety of students in international education programs. The report compares UW institutional policies and procedures with both System and national guidelines. The review addresses: 1) strategies for protecting student health and safety; 2) responsibility for student health and safety problems; and 3) program administration.

Protection Strategies -- While not all risks can be avoided, guidelines suggest that efforts to carefully evaluate program locations and to educate students about potential risks may help prevent injuries and deaths. Site visits are the most direct method of assessing a potential program site, but information collected from students and faculty who have studied abroad can also be valuable. Some institutions use faculty committees in the advance-assessment process. The report recommends UW international education program administrators work with UW System and institution risk managers to develop guidelines for assessing health and safety issues before planning or approving programs.

Guidelines suggest international education programs consider health and safety issues as part of the pre-departure process. Some UW System institutions ask students to voluntarily report medical conditions so that any necessary accommodations can be made. The report recommends that all UW international education programs establish appropriate approaches, while remaining sensitive to privacy and legal issues, for identifying students' health and safety concerns prior to travel.

UW international education programs use a variety of orientation programs to provide participants with information about what to expect during a program. Orientations typically cover such areas as cultural adjustment, health information, emergency contacts, insurance coverage, sexual harassment and assault, money matters, and on-site transportation. In addition to student orientation, proper training for faculty who lead programs could also be beneficial. The report recommends UW System institutions work with UW System and institution risk managers to provide training to assure that faculty leaders are adequately prepared to handle emergency situations abroad.

Responsibility for Addressing Problems -- Accidents, illnesses and other emergencies can occur in international education programs, despite the best efforts to prevent them. Through their efforts to prevent problems, the UW System institutions take a number of steps to define responsibility for managing emergencies and other problems that may occur. The report recognizes these efforts and, in addition, recommends that UW international education programs: 1) require participants in non-credit programs, as well as for-credit programs, to sign the UW System release form; 2) work with UW System risk management staff to purchase health, medical evacuation and repatriation insurance for students and include the insurance costs in program fees; 3) establish required contingency funds, where this has not been done; and 4) establish emergency plans for managing crises in international education programs.

Program Administration -- The review found that UW institutions have established various organizational structures for managing international education programs. The review also highlighted some contracting and reporting concerns. Included are recommendations for UW international education program administrators to assure that: 1) administrative structures are in place to ensure that UW System safety policies are implemented; 2) international education contracts are reviewed by legal counsel, as appropriate; and 3) incident reporting and program evaluation procedures are established. In addition, the report recommends that the UW System Administration Office of Legal Counsel establish guidelines for UW administrators to use when establishing international education contracts.

SCOPE OF REVIEW

This program review describes the implementation of policies and procedures intended to protect the health and safety of University of Wisconsin (UW) students who travel abroad as part of an international education program. To conduct the review, Office of Internal Audit staff made site visits to UW-Madison, Milwaukee, Eau Claire, La Crosse, Oshkosh, Platteville, Stevens Point, and Whitewater. During these site visits, audit staff collected documentation and interviewed international education directors and their staffs about programs, policies and procedures. Similar information was also collected from UW institutions that were not visited. Program practices were compared to UW System Administration policies and national guidelines.

For purposes of this review, "international education" is used to describe study abroad, exchange and short-term travel programs through which UW students travel outside the United States.

BACKGROUND

The number of students participating in international education programs has been increasing over the past few years, and policymakers are encouraging further increases. At the same time, there have been several incidents involving the death or injury of students studying abroad. Some incidents resulted in lawsuits, creating liability concerns for institutions of higher education. These incidents have increased awareness of health and safety issues among students, parents, legislators and international education program administrators.

Increased Participation in International Education

Student participation in international education has grown in recent years.

The number of students participating in international education programs has increased rapidly since 1994. According to the Institute for International Education, 113,959 U.S. students studied abroad in the 1997-98 academic year. This represented a 14.6 percent increase from the previous year. While the leading destination for U.S. students continues to be Western Europe, more students are choosing alternative sites. According to the Institute, the share of Americans studying in Europe fell by 15 percent between the 1985-86 and 1997-98 academic years, while the proportion going to Latin America more than doubled, from 7 percent to 15.3 percent.

At least two recent initiatives were designed to further increase the number of students studying abroad. In 2000, President Clinton directed the Secretaries of State and Education to "support the efforts of schools and colleges to improve access to high-quality international educational experiences by increasing the number and diversity of students who study and intern abroad, encouraging students to choose nontraditional study-abroad locations, and helping under-represented U.S. institutions offer and promote study-abroad opportunities for their students." In response, the U.S. Secretary of Education established a new goal of doubling the number of students who study overseas over the next decade.

National and statewide efforts to increase participation in international education programs are intended to help prepare students for the global economy.

In addition, Governor Tommy Thompson announced an international education initiative in September 1997. As part of that initiative, the Wisconsin International Trade Council (WITCO) established a task force to review international education programming. The task force found that UW students are much less likely to participate in international education programs than are students from Wisconsin's private institutions, with only two to four percent of UW students participating in international education programs. To increase the number of UW students traveling abroad, the task force developed several recommendations, including a recommendation to provide grants to UW students to study abroad.

Incidents in Other Institutions' International Education Programs

Incidents involving the death or injury of students from institutions here and in other states have raised concern about student safety in international education programs.

At the same time that more students have been encouraged to study abroad, several incidents involving the death or injury of students from institutions here and in other states have raised concerns about safety practices in international education programs. One recent example involved the murder of two women in Costa Rica in March 2000. One of the women was participating in a "creative co-op" program sponsored by Antioch College, a small liberal arts school in Ohio.

In a series of articles published by the Detroit News, journalists reported that the student who was killed had not been given any orientation about the culture or laws of Costa Rica, that she had no contact person on site, and that she was left to find housing on her own. The articles also noted that some international education programs send students to countries that the State Department has warned Americans to avoid, that one in four institutions do not

The murder of two women in Costa Rica, including one woman who was participating in an Antioch College co-op program, increased public scrutiny of safety in international education programs.

Several incidents involving students from higher education institutions in other states have raised awareness among students, parents, legislators and international education program administrators of the need to review safety practices in international education programs.

require students to have health insurance before going overseas, and that there are wide discrepancies in universities' safety policies. In October 2000, a Congressional hearing was held in response to this incident. During the hearing, parents of students who had been killed or injured during international education programs testified about the need for more accountability and improved monitoring of the risks associated with these programs.

Other recent incidents involving the death or injury of students studying abroad include:

- In January 1998, a group of 16 people from St. Mary's College of Maryland was attacked during a tour in Guatemala. Five students were raped, and the group was robbed.
- In 1997, an Ohio State University student died of altitude sickness on a glacier in the Himalayas in a program run by a university professor.
- In 1996, a last-minute schedule change required students and faculty in the University of Pittsburgh's Semester at Sea program in India to take an unplanned six-hour bus trip to reach their destination. The bus rolled over and killed seven people, including four students and the husband of an educator from the University of Pittsburgh.

Efforts to increase the number of UW students traveling abroad heighten the importance of policies and procedures that can help to protect the health and safety of students studying abroad. Appropriate approaches may also help reduce an institution's legal responsibility for incidents that do occur. This review examined policies and procedures UW international education programs have implemented to address student health and safety.

DISCUSSION AND RECOMMENDATIONS

The objectives of this review were to describe UW international education programs and to determine the extent to which UW international education programs have implemented policies and procedures to address student health and safety. Institutional practices were compared to UW System Administration policies,

This review examined policies and procedures intended to protect the health and safety of students studying abroad.

to national guidelines, and in some cases, to the practices of educational institutions in other states. Recommendations were designed to help programs prevent health and safety problems in international education programs. The review addresses: 1) UW System institutions' strategies for protecting the health and safety of students; 2) responsibility for student health and safety problems; and 3) program administration.

OVERVIEW OF UW INTERNATIONAL EDUCATION PROGRAMS

Approximately 3,100 UW students participated in UW international education programs during the 1999-00 academic year.

UW institutions offered approximately 150 international education programs in 45 countries during the 1998-99 academic year. Almost 20 percent of these programs were offered in countries located outside of Western Europe or similarly advantaged regions. These destinations included Vietnam, Russia, Nepal, India, and Cuba. Approximately 3,100 UW students participated in UW international education programs during the 1999-00 academic year, according to data from UW System Administration's Central Database Reports.

Types of UW International Education Programs

UW international education programs include study abroad, exchange and short-term travel programs.

Our review of the types of UW international education programs UW institutions offer indicates that these programs generally fall into the following categories: study abroad programs, exchange programs, and short-term travel programs. Several institutions also offer non-credit travel programs for students and community members as part of their extension and outreach activities.

Study abroad programs are semester- or year-long programs through which students either enroll directly in a foreign institution or participate in a program a U.S. institution offers in another country.

Study abroad programs -- Study abroad programs are usually semester- or year-long programs through which students either enroll directly in a foreign institution or participate in a program a U.S. institution operates in a foreign country. Typically, students travel in a group to the country, and often a faculty member accompanies them from their home institution. Twelve UW System institutions reported that they offer at least one study abroad opportunity as part of their international education programming efforts. Two examples illustrate how some UW System institutions have implemented the study abroad program model:

- The West Central Wisconsin Consortium, consisting of UW-Eau Claire, La Crosse, River Falls, Stout, and Superior,

operates the Wisconsin in Scotland program. UW-River Falls is the fiscal agent for the program. A total of 75 students may attend each semester. Students live in a castle and study general elective courses, such as economics, computer science, English and biology.

- UW-Stevens Point uses the study abroad model extensively. For example, UW-Stevens Point offers a program in Australia for approximately 40 students each semester. Room and board is provided at the University of the South Pacific, Fiji and Dunmore Lang College in Sydney. All four of the fall semester programs and two out of five spring semester courses during the 1998-99 academic year had a faculty member who stayed with students during the entire program, teaching one or two classes and serving as an on-site resource to students. Students may take a variety of courses, including site-related courses such as Australian and Fiji culture and Australian literature.

Exchange programs are developed through agreements between educational institutions.

Exchange programs -- Exchange programs are developed through agreements between educational institutions. The agreements typically describe how many students will be sent abroad and accepted from the partner institution. Students pay the normal rate of tuition to their home institution and then enroll in the foreign institution. Many exchange programs provide students with "language immersion" experiences, in which students are required to have proficiency in a foreign language and use that language during participation in the program. Seven UW System institutions reported that they offer exchange programs. The following are examples of exchange programs at two UW System institutions:

- Twelve of the 23 international education programs at UW-Milwaukee are exchange programs. The Justus Liebig Universität Exchange in Giessen, Germany provides intensive language instruction followed by direct enrollment in a wide variety of course offerings. A semester- or year-long French language immersion program at the University of Montreal in Montreal, Quebec, Canada offers students the opportunity to enroll in a wide variety of classes, all taught in French.
- UW-La Crosse and Dubna International University in Russia established an exchange agreement in 1999, complementing the sister-city relationship between La Crosse and Dubna. Courses are offered for students with and without Russian

language skills. UW-La Crosse also has an exchange agreement with Guangxi Normal University in Guilin, China, where courses in Chinese language, literature and culture are offered.

Because short-term study tour programs can be less expensive and do not require extensive time commitments, short-term programs are accessible to a broader range of students than traditional international education programs.

Short-term study tour programs -- In a typical short-term study tour program, a faculty member accompanies a small group of students to another country for anywhere from a few days to a few weeks. Courses are typically specialized and focus on a specific subject area.

Students who have work or other responsibilities that prevent them from participating in a traditional semester or year-long program often find that they are able to participate in a short-term study tour program. These programs also may be less expensive than other forms of international education programming. Because the programs are accessible to a broader range of students, several UW international education program directors indicated that they plan to expand the number of short-term travel programs that they offer.

Twelve UW System institutions reported that they offer short-term travel tour programs. For three of these institutions, short-term programs are the primary type of international education. Examples include:

- UW-Stout offers a five-week, four-credit archaeology field school in conjunction with the University of Minnesota. The summer 2000 excavations explored medieval iron production in the Esk Valley in Cumbria, England.
- In 1999 UW-Oshkosh and UW-Extension offered a twelve-day geology trek in Nepal's Himalayas. The trek was led by a UW-Oshkosh professor of geology and organized by an adventure travel agency from Salt Lake City. UW-Oshkosh and UW-Extension also offered "Howler Monkey Research in Belize" in March 2000. During the weeklong program, participants observed and recorded Howler monkey behavior.

Study abroad and short-term study tour programs are funded on a cost-recovery basis, while students who participate in exchange programs pay tuition at the home institution.

Program Expenditures and Student Costs

UW System institutions reported expenditures for international education programs involving UW students traveling abroad that totaled approximately \$13.6 million in fiscal year (FY) 1998 and \$15.7 million in FY 1999. Study abroad and short-term study programs are funded on a cost recovery basis and are covered

primarily by student fees. Students who participate in an exchange program pay regular tuition to the home institution.

Student fees for UW international education programs vary significantly, depending on the program. Airfare, lodging, meals and field trips are among students' costs. During the 1999-00 academic year, students paid \$2,250 to participate in UW-Oshkosh's Howler Monkey Research in Belize, \$4,100 to participate in the West Central Wisconsin Consortium's Wisconsin in Scotland program, and \$6,350 for a UW-Platteville program in Seville, Spain.

The 1999-01 biennial budget provided \$1.5 million to UW System Administration institutions for grants to selected Wisconsin residents who study abroad.

To help students pay for international education, the 1999-01 biennial budget provided \$1.5 million to UW System institutions for grants to Wisconsin residents to study abroad. Grant money was distributed to each institution based on student population. Section 36.36, Wis. Stats., allows institutions to provide up to \$2,000 in grant funds to a resident undergraduate student who:

- demonstrates financial need for the grant, as determined by the Board of Regents;
- is enrolled full-time in the UW System in the semester preceding the student's study abroad; and
- is enrolled in an associate or bachelor's degree program.

Administrators expect the grant program to increase the number of students studying abroad.

Because of the late passage of the 1999-01 budget, UW institutions had either not yet received the grant funding or were in the early stages of implementation at the time of our review. Questions about implementation, such as how to determine financial need and whether grants could be given to UW students who participate in programs sponsored by private institutions, were still being resolved. Those UW international education administrators who had begun implementation indicated strong support for the program. They expect the grant program to increase the number of students studying abroad.

STRATEGIES FOR PROTECTING STUDENT HEALTH AND SAFETY

While UW international education staff report that incidents are rare, some participants in UW international education programs have been injured and others killed in automobile and bus

accidents. Participants have been victims of crimes such as theft, sexual harassment and assault and have suffered illnesses, injuries and mental health problems requiring medical attention.

Guidelines for Protecting Students

Efforts to educate students about potential risks may help prevent illnesses, injuries and deaths. Students, faculty and staff traveling to countries outside the United States cannot be totally protected from danger as not all threats can be predicted and prevented. Also, students may make personal choices that place themselves at risk. However, policies and procedures may be implemented that will help protect student health and safety. Guidelines have been implemented at UW System and at the national level.

The University of Wisconsin System's Academic Information Series (ACIS) 7 outlines policies for international education programs, including policies intended to protect the safety and welfare of students and faculty traveling abroad.

Academic Information Series guidelines -- Academic Information Series (ACIS) 7.1 through 7.4, "Policy Guidelines for the Conduct of International Education Programs in the University of Wisconsin System," outlines policies for off-campus international education programs, including several guidelines that are intended to protect the health and safety of students traveling abroad. These guidelines direct UW System institutions to:

- require students to obtain accident, health, medical evacuation and repatriation insurance;
- provide information to program participants on available medical care;
- provide participants with information about the limits on the program sponsor's responsibility, such as being unable to eliminate all risks or to assure that U.S. legal standards apply in foreign countries;
- disclose all known risk factors based on official U.S. government sources; and
- have every participant sign the UW System Uniform Statement of Responsibility.

ACIS guidelines require UW international education program administrators to discuss insurance and to disclose all known risk factors, based on official U.S. government sources.

Any exception to the provisions outlined in the guidelines requires approval of the institution's vice chancellor, with notice provided to the UW System Council on International Education and the Senior Vice President for Academic Affairs.

Best-practice guidelines identify approaches for protecting student health and safety in international education programs.

National best-practice guidelines -- In addition to the Academic Information Series, there have been some efforts nationally to establish guidelines that identify best practice approaches for protecting student health and safety in international education programs. These guidelines include the following:

- The Inter-organizational Task Force on Safety and Responsibility in Study Abroad developed a set of recommendations designed to promote health and safety in study abroad.
- NAFSA's Guide to Education Abroad for Advisers and Administrators, Second Edition by the National Association for Study Abroad (NAFSA): Association of International Educators, provides a thorough discussion of best practice approaches for international education programs.
- The University of Southern California produced a set of guidelines, "SAFETI (Safety Abroad First-Educational Travel Information) Program Audit Checklist", which discusses best practice approaches and provides examples of how institutions in other states implement these approaches.

Using these resources as guidelines, we reviewed three practices intended to protect student health and safety at UW System institutions, including: 1) advance assessment of health and safety issues; 2) health and safety issues screening; and 3) orientation.

Advance Assessment of Health and Safety Issues

The location of international education programs can directly affect the health and safety of program participants. Travel to underdeveloped or politically unstable countries may expose participants to risks such as a lack of medical care, poor transportation, civil unrest and crime. However, even seemingly safe locations in Western European countries may present certain risks. As one UW international education program director noted, many parents and students assume that programs in London are safe, yet the threat of terrorism remains an ongoing issue in that city.

To manage these risks, Inter-organizational Task Force on Safety guidelines recommend that international education program staff assess new sites and continually monitor existing sites to identify issues that can affect the health and safety of program participants.

Inter-organizational Task Force on Safety guidelines suggest that international education program staff conduct periodic assessments of health and safety conditions in international education programs.

A site visit can provide important information about potential risks.

Student and faculty feedback may provide valuable information about sites.

Consistent with ACIS guidelines, we found that UW international education administrators reported that they monitor and share U.S. State Department Consular information, public announcements and travel warnings with program participants.

Site visits are another way to identify potential health and safety issues. During site visits, administrators assess a variety of issues. For example, one administrator travels to the partner institution, meets with staff, visits student housing and the library, sits in on a class and collects materials to be used in courses. Personal observation may sometimes be the best way to determine whether a site is safe. One administrator reported that it wasn't until a visit to a potential new program in Jamaica that he realized the site would be an unsafe location to send students. When he arrived to visit the institution, he found that armed guards and barbed wire fencing surrounded the campus.

While program administrators indicated that they review health and safety issues during site visits, they do not appear to use specific guidelines or standards to assess health and safety in international education programs. Without specific guidelines, appropriate health and safety issues may not be consistently or adequately assessed.

One approach that could be considered is to develop a health and safety assessment tool for UW international education programs. A health and safety assessment tool might outline standards identifying the circumstances under which fire extinguishers should be available in student housing, whether fire exits in dormitories owned by foreign institutions are adequate, or whether students have access to safe transportation. While it may not always be feasible for foreign institutions to meet standards that are considered appropriate in the U.S., use of an assessment tool could be a useful exercise to identify potential deficiencies in health and safety.

It is not always practical for UW international education staff to visit sites. Even institutions that use site visits extensively may be able to visit each site only once every several years. New health and safety issues could arise in the meantime. Other methods UW international education programs use to assess health and safety issues have included: soliciting feedback from faculty who have led programs, discussing health and safety issues with students, and reviewing program evaluation forms to determine whether health and safety issues have been identified. Some also report

that they contract with reputable organizations and rely on those organizations to assure health and safety standards are met.

Some institutions have established a committee to review health and safety issues in international education programs.

Once health and safety information about a site is collected, program administrators must decide whether to establish or continue a program. Some institutions use a faculty committee for this purpose. For example, at UW-La Crosse, a faculty committee must review and approve all faculty-led study tours. The committee considers health and safety issues during this review. UW-Madison also uses a faculty advisory committee to review information collected in a formal report to determine whether programs should be approved or terminated.

Michigan State University uses another type of committee to review the safety of programs. Michigan State has a high-level Study Abroad Security and Risk Analysis Group. It is chaired by a vice president and includes members from the Office of Risk Management, the Office of the General Counsel, the Provost's Office, International Studies and Programs, and the Office of Study Abroad. The committee reviews safety and security issues for proposed study abroad sites and participates in all decisions concerning the suspension of current programs for safety, health, or security reasons.

Site assessment guidelines that incorporate health and safety standards could be used to review sites for international education programs.

Because program administrators may not be familiar with all relevant health and safety issues, an assessment tool developed with the assistance of risk management experts could assure that appropriate health and safety issues are identified during assessments. *We recommend that UW international education program administrators, in cooperation with UW System and institution risk management professionals, develop guidelines to use to assess health and safety issues before students study abroad.* In addition, UW international education programs may wish to consider establishing committees consisting of appropriate staff to review health and safety issues.

Health and Safety Issues Screening

Inter-organizational Task Force on Safety guidelines recommend that institutions consider health and safety issues prior to student participation.

Inter-organizational Task Force On Safety guidelines recommend that institutions “consider health and safety issues” when evaluating the appropriateness of an individual's participation in a study abroad program. These efforts can help assure that students who pose a risk to others are not enrolled in the program. They may also help identify students who have health issues that may require special accommodations.

We reviewed the extent to which UW international education programs consider health and safety issues when selecting participants for an international education program. Most UW institutions rely entirely on academic and personal references. For example, students may need to meet minimum grade point average requirements, submit letters of recommendation, write an essay explaining their interest in the program, be enrolled in a specific academic program, or complete an interview.

Some UW international education programs also consider a student's disciplinary history. In these cases, names of potential participants are sent to the Dean of Students to determine whether any of the students have been subject to the institution's formal disciplinary process.

Programs need reasonable and appropriate approaches for identifying student health and safety concerns before travel occurs.

Students' medical conditions can also present a special challenge for international education programs. Protecting students' privacy and avoiding any discriminatory actions are essential. However, national guidelines recommend asking students to voluntarily report medical conditions and then using that information to counsel students. Several UW System institutions already use this approach. UW-Madison asks students to fill out a self-disclosure form about medical conditions after they are accepted into a program, as does UW-Stout. Reasonable efforts to have students identify potential health issues could help programs arrange appropriate services for students. At one institution, a student reported that he had a heart problem, and program staff identified a doctor for the student in the community where he would be studying. Other UW institutions report that they use orientation and counseling methods to try to assure that students have realistic expectations of program participation. *We recommend that all UW international education programs establish reasonable approaches for identifying health and safety concerns so that program staff can provide appropriate information in advance to participants.*

Orientation

ACIS 7.1 requires programs to provide "pre-departure and/or on-site orientation for all participants." Similarly, Inter-organizational Task Force on Safety guidelines suggest that orientation meetings and materials be provided to participants prior to departure for the program, as well as once they arrive on site. According to Inter-organizational Task Force on Safety guidelines, the orientation materials should include information on health and safety

During orientation, UW international education programs typically include general information about health and safety in travel abroad, as well as information about specific risks associated with an international education site.

conditions in the host country and describe emergency response measures.

All UW international education programs provide pre-departure student orientation. Many programs also provide on-site orientation. Orientations typically include general information, as well as information about the specific location of the program. A typical orientation session covers issues such as: cultural adjustment; sexual harassment and assault; health information; emergency contacts; insurance coverage; money matters; luggage and packing; travel emergencies; on-site transportation; and advice about drugs, alcohol and sex. Some unique approaches to orientation at UW institutions include the following:

- Peer educators present skits at UW-Madison.
- Program alumni present information to participants at several UW System institutions.
- UW-La Crosse requires students to complete a one-credit course by a professor of cross-cultural psychology.
- UW-Whitewater requires students to view a 30-minute NAFSA-produced video that discusses safety issues.
- With student consent, UW-Eau Claire provides parents with a parent handbook produced by NAFSA. Also, UW-Stevens Point encourages students to invite parents to orientation.

International education programs that provide information to students about potential risks involved in international study not only may protect students, but could also reduce the institution's legal responsibility if an incident does occur. Recently, a taxi driver sexually assaulted a University of Minnesota study-abroad student in Cuernavaca, Mexico. The student sued the University of Minnesota Board of Regents. The Minnesota Court of Appeals determined in April 1999 that the university was statutorily immune from liability in this instance, in part because the university had engaged in policy-making when it had specifically warned students about the dangers of taxi use in Cuernavaca.

All UW international education programs included in our review provide orientation for students participating in international education programs. Evaluating student orientation efforts could help international education programs identify the most effective

strategies for providing information to students. One method would be to include specific questions in student evaluations about the usefulness of the orientation sessions or materials.

Evaluating the effectiveness of UW international education programs' orientation approaches could be useful for ensuring future orientations are comprehensive.

In addition to student orientation, proper training of the faculty who lead programs could be beneficial. ACIS 7.2 states that "the home institution should provide orientation and training for faculty or academic staff with program duties abroad." Faculty who lead a group of students abroad sometimes encounter situations that they may not be accustomed to handling as part of their normal teaching duties. Incidents described during the review, for example, revealed that UW faculty have had to handle lost passports, participants who became ill and required medical care, student misbehavior, participants who developed mental health problems, and motor vehicle accidents.

Many UW institutions rely on faculty leaders to handle emergencies on site.

Since many UW institutions rely on faculty leaders to appropriately handle health and safety issues on site, it is important that faculty receive adequate information and training about health and safety issues. While program administrators meet with faculty and provide leaders with handbooks and other materials, UW institutions generally do not provide formal training for faculty leaders about health and safety issues. *To assure that faculty leaders are adequately prepared to handle emergencies, we recommend that UW international education programs work with UW System and institution risk managers to provide training about health and safety issues in international education programs to faculty leaders, as appropriate.*

Training could help prepare faculty to handle emergencies abroad.

RESPONSIBILITY FOR STUDENT HEALTH AND SAFETY PROBLEMS

Accidents, illnesses and other emergencies are likely to occur in international education programs despite the best efforts to prevent them. Some institutions anticipate this possibility by: 1) clarifying responsibility for student health and safety by having students sign release and disclaimer forms; 2) assuring that students have adequate insurance; 3) maintaining a contingency fund; and 4) assuring that the institution has a process in place to respond to incidents. We reviewed the extent to which UW institutions use each of these approaches.

Release and Disclaimer Forms

ACIS 7 requires students to sign the University of Wisconsin System Uniform Statement of Responsibility, Release and Authorization, a systemwide release and disclaimer form.

Programs use release and disclaimer forms to clarify responsibility for incidents that may occur during a program. ACIS 7.1 requires that all UW students participating in international education programs sign the UW System Uniform Statement of Responsibility, Release and Authorization to Participate in Study Abroad and Exchange Programs. The form states that:

- the student assumes full legal and financial responsibility for participation in the program;
- the University has the authority to act in any attempt to safeguard safety and health including authorizing medical treatment at the student's expense;
- the student is required to secure health, evacuation and repatriation insurance;
- the student agrees to conform with student codes of conduct; and
- the student indemnifies the University and holds it harmless from any liability not arising out of negligence.

Some UW System institutions sponsor non-credit international education programs designed primarily for members of the community and do not require participants to sign releases.

All UW international education programs that provide academic credit had proper procedures in place to assure that all students sign the System waiver form. For example, most administrators indicated that they would not complete a student's application until the student completes the form. Others do not distribute plane tickets to students until the form is received.

Participants in non-credit study abroad programs should also sign the UW System Uniform Statement of Responsibility, Release and Authorization.

One non-credit program included in our review reported that it does not require participants to sign the UW System release and disclaimer form. Participants in this program were community members and not formally recognized as UW students. It is not clear whether ACIS 7.1 guidelines requiring participants to sign the UW System Uniform Statement of Responsibility apply to these non-credit programs. However, these programs may also involve risk and potential legal responsibility for the institution. *We recommend that UW institutions that sponsor non-credit international education opportunities for community members require participants to complete the UW System Uniform Statement of Responsibility, Release and Authorization.* The form may require some modification for this purpose.

Use of a release and disclaimer form to outline specific risks associated with a program is another way to assure students are adequately informed about potential health and safety issues in a program.

In addition to the systemwide release form, at least three institutions use supplemental release and disclaimer forms. Two of these have hold-harmless provisions specific to the individual institution. Another form, used by the private company working with UW-Oshkosh on the geology trek to Nepal, illustrates how risks specific to a program or site can be communicated. This form included:

- a statement that "there are many inherent dangers in the types of activities that I will encounter on my expedition. I recognize that these risks may result in serious injury or death...";
- a list of 11 specific threats to the health and safety of participants, including falls; frostbite "which may result in the loss of limbs, digits and/or permanent scarring"; acts of nature such as avalanches, rock fall and crevasse fall; drowning; modes of transportation "which in certain areas may not be up to North American or European safety standards"; and altitude sickness;
- a statement indicating that the participant's level of fitness is appropriate for the program and authorizing program staff to seek medical treatment in case of emergency; and
- a process for arbitrating disputes.

The latter form was designed for a program that included an unusually high level of risk. UW international education programs currently provide information at orientation about specific risks involved with a program or site. However, for high-risk programs, administrators could consider using supplemental release and disclaimer forms. According to NAFSA, having a student sign a form detailing specific risks may, at least partially, protect a program from some legal claims and may help discourage petty lawsuits. Legal counsel should review any release and disclaimer form before it is used.

ACIS 7.1 requires that students have or purchase accident, health, medical evacuation and repatriation insurance.

Insurance

ACIS 7.1 requires students to have or purchase accident, health, medical evacuation and repatriation insurance. If a person becomes sick or injured while away from home, medical evacuation insurance covers the costs of transporting the patient

UW institutions use a variety of approaches to assure that students have adequate insurance.

either to the closest site with adequate health care or to a person's home country. Repatriation insurance pays for the return of remains after a death. Under ACIS 7.1, the responsibility for purchasing insurance remains with the student. Methods UW international education programs have used to assure that students have appropriate insurance coverage include:

- informing students of the need for health, medical evacuation and repatriation insurance;
- having students sign a form verifying that they have adequate health insurance;
- requiring students to submit a letter from the insurance carrier to prove that the student has adequate insurance; and
- in one case, including insurance in program costs, because the international education program was operated under contract with an outside agency.

In addition to proof of insurance, five programs promote the purchase of the International Student Identification Card (ISIC). For \$22, the ISIC provides a \$100-per-day medical benefit, \$3,000 for accident medical expenses, \$25,000 for medical evacuation and \$7,500 for repatriation of remains. Four UW international education programs reported that they purchase and include the International Student Identification Card (ISIC) as part of the program, while two additional programs inform students about the student identification card and encourage students to purchase it.

Despite the ACIS requirement, some students have discovered that their insurance was inadequate after arriving overseas.

During interviews it was reported that, in a few cases, students discovered that their insurance was inadequate after they arrived overseas. Inadequate insurance can cause significant financial hardship for students and their families in the event of an illness, injury or death, because medical evacuation and repatriation services can be expensive. The cost to return one UW student who was recently injured while studying abroad reportedly reached close to \$100,000. Fortunately, the student's family had adequate insurance coverage to cover those costs. Repatriation of remains can cost \$15,000 or more.

Inadequate insurance can cause significant financial hardship for students and families.

One approach to assure that students have adequate insurance to cover these costs is to provide insurance and to include the cost in program fees. A review of the practices of 17 higher education institutions nationally revealed that seven of these institutions

provide health, medical evacuation and repatriation insurance as part of regular fees for international education programs.

To assure that all students have adequate insurance coverage, some institutions in other states purchase insurance and include the cost in fees for international education programs.

While providing insurance could assure that all students are adequately covered, this approach could result in some students having duplicate insurance, requiring them to pay more than is necessary. The University of Southern California (USC) allows students to receive an exemption from insurance coverage if the student can prove that he or she is adequately covered, typically by providing a letter or a policy statement from the insurance company.

Purchasing insurance coverage for international education students on a systemwide basis could be cost effective.

The cost of health, medical and repatriation insurance is another concern. The UW System Administration's Office of Safety and Loss Prevention had these costs analyzed by an outside consulting firm in May 1999. The consultants found that, if purchased on a systemwide basis, insurance could be provided to UW international education students traveling abroad for \$23.50 to \$41.50 per month. For a four-month program costing \$4,000, these fees would represent between 2.4 and 4.2 percent of program costs. These premiums would provide \$50,000 in medical evacuation and between \$15,000 and \$50,000 in repatriation insurance.

UW System institution administrators have varying perspectives on the best approach for ensuring international education students are adequately insured. UW System Administration staff are currently exploring additional options for purchasing a systemwide policy. As mentioned above, the consequences for inadequate insurance can be financially devastating for students and their families. ***Given the relatively inexpensive cost of insurance and the potentially significant consequences of inadequate coverage, we recommend that UW System Administration purchase a systemwide insurance policy to provide coverage for all UW students traveling abroad.*** The cost of the insurance would be included in students' program fees. The UW System Office of Safety and Loss Prevention will need to work with the UW institutions to develop a specific implementation strategy.

Contingency Fund

ACIS 7.1 requires UW international education programs to “maintain a reserve/contingency fund adequate to respond to emergencies and unforeseen problems.” Financial and Administrative Policy (FAP) 45 also allows for a reasonable

ACIS 7.1 requires UW international education programs to maintain a contingency fund to respond to emergencies and unforeseen problems.

reserve. Neither policy specifies a reserve amount or criteria for using the funds. We reviewed the extent to which UW international education programs have established contingency funds. Since more than one program was included in the review at some institutions, a total of 19 programs was reviewed. Of these, 12 programs reported having a reserve or contingency fund, with amounts ranging from \$11,000 to \$500,000 at the time of the review. Some administrators were unaware of the requirement to establish a reserve.

Programs reported using a variety of approaches to establish and maintain the fund. Three programs charge students a percentage of the cost of the program, with percentages ranging from 4 to 15 percent. Other programs charge students a fixed fee, ranging from \$25 to \$100. Another reported that the fund is maintained at a level sufficient to evacuate two groups from two programs at a time when no discounts on airfare would be available. Some programs reported that they do not currently charge student fees for the contingency fund because the programs established reserves over past years as a result of favorable exchange rates and other factors.

Contingency funds have so far been needed for relatively low-cost items.

Programs reported that they have used the contingency fund primarily to cover small costs. One administrator reported that the program paid for a hotel room for a student after he was injured on a plane when a suitcase fell on him. Another institution paid for a hotel room while a student was delayed because of problems with his visa. In addition to actual uses, one director indicated that the fund might be used to cover significant variations in the cost of programs due to fluctuations in the exchange rate.

All UW institutions' international education programs should have contingency funds and criteria for establishing and maintaining them.

Since student fees are often used to establish and maintain the contingency fund, careful analysis to estimate funding needed for emergencies could be useful for making sure fees are assessed appropriately. Programs could consider developing guidelines for using the fund and then determine the amount needed to meet those needs. Because the contingency fund is rarely used, an analysis of how to spread fees over time could also be considered. *To assure that institutions have resources available to manage emergencies in international education programs, we recommend that all UW international education programs establish a contingency fund, in compliance with ACIS 7.1(d). In addition, each institution should clarify the uses of its fund and assure that student fees reflect realistic needs for a reserve.* UW System Administration staff, working with international

education program directors, could also consider revising ACIS 7 and FAP 45 to provide guidance for managing contingency funds.

Managing Emergencies

At times it may be necessary to evacuate students from a country if a crisis emerges. ACIS 7.1 requires that "in the event that it becomes necessary to terminate a program or relocate any or all of its participants, the program will implement an evacuation plan." According to the USC SAFETI document, an emergency plan "can improve the handling of a crisis, reduce costs and injuries, and prevent a chain reaction of crises. By explicitly preparing for possible crises, the Emergency Action Plan could serve as a guide during the crises, defining roles and responsibilities, step by step instructions, and a communication network."

Developing an emergency plan can help institutions effectively respond to crises.

Some UW System institutions have plans that cover international education programs. Others would need to develop plans that specifically address roles and responsibilities in the event of a crisis during international study. At UW-Stevens Point, if an emergency occurs in an international education program, the institution's crisis team would be called and the institution's regular campus crisis plan would be used to manage the situation. UW-Oshkosh has established an emergency plan for each of its programs, outlining steps to be taken in the event of a medical emergency or a civil disturbance and a list of emergency contacts. *If a plan has not already been developed, we recommend that each UW international education program develop an emergency plan that outlines a protocol for managing crises in international education programs.* Plans should identify appropriate responses in case of a crisis that occurs at any hour of the day or night.

PROGRAM ADMINISTRATION

We reviewed additional program administration issues: 1) administrative oversight; 2) contracts; 3) program evaluation and incident reporting; and 4) financial management.

Administrative Oversight

Twelve UW institutions have established an international education office to coordinate study abroad, exchange program and short-term travel program activities. These offices develop

agreements with foreign institutions, recruit and screen potential student participants and faculty leaders, provide orientation programs, assist students, and manage the study abroad budget.

Administrative oversight is necessary to assure that health and safety practices are implemented.

At least two UW institutions do not have a central office to coordinate international education activities. At these institutions, individual faculty members have typically organized and administered trips abroad. According to some administrators, faculty leaders may not be aware of the policies and practices that are required or recommended to best protect student health and safety. To assure proper administrative oversight of programs, one of the institutions without an international education office is using a small grant from UW System Administration to formalize policies and procedures for international education programs. *We recommend that institutions without an international education office establish an administrative structure to assure that all international education programs are in compliance with UW System international education safety policies.* This might mean assigning responsibility for compliance to one individual at the institution or setting up a process for verifying that all appropriate precautions have been taken before each international education program or trip begins.

Strengthened administrative oversight could also improve data reporting. During the course of this review, there were inconsistencies between the number of international education students UW institutions reported in Central Data Reports (CDR) and the number of students program staff reported to us. Since CDR data is the officially recognized source for tracking the number of UW students in international education programs, it is important for institutions to assure the CDR information is accurate. To meet that goal, UW System Administration's Office of Policy, Analysis and Research and staff from UW institutions are working together to clarify reporting requirements for international education programs.

Contracts

International education contracts play an important role in managing risks.

Contracts can play an important role in managing risks in international education programs by clarifying responsibility for program services. Contracts and other written agreements are used to develop exchange programs, establish consortium agreements between UW and other U.S. institutions, and hire foreign institutions and private vendors to provide programming and services. Statements included in promotional literature,

orientation sessions, institutional policies and release forms may also create contractual obligations.

We analyzed 16 international education contracts from UW international education programs to determine whether these agreements address health and safety issues and the extent to which the agreements assigned responsibility for providing program services. We reviewed letters of understanding, exchange agreements, and formal contracts with private vendors. Some of the issues addressed in these agreements included: 1) requiring the host institution to provide access to medical care; 2) specifying that the student's home institution was not liable for the student's medical fees; 3) providing a process to resolve conflicts between a student and a host family; and 4) outlining a process for resolving disputes with a partner institution.

Contracts in international education programs involve complicated legal issues.

Contracts and agreements in international education programs involve complicated legal issues. Agreements are frequently established with multiple institutions or service providers. Partner institutions are often located in countries where U.S. legal standards do not apply. Under some circumstances, contracts must be translated into a foreign language. Because careful wording is important, proper translations could be a particular challenge.

Contracts also must comply with a variety of requirements. For example, only certain university administrators are authorized to sign contracts and commit an institution to a contract. Also, care must be used to not agree to clauses that violate open records laws or that improperly assume responsibility for risks.

UW international education program administrators use a variety of approaches to develop contracts and cooperative agreements, including: relying on past examples, using a model developed by an attorney, or reviewing contracts from other UW institutions. Administrators reported that they have not encountered problems with the contracts they developed using these approaches. However, past examples may not properly account for recent legal decisions. Also, contracts could contain inappropriate provisions; at least one contract we reviewed included a clause that may conflict with legal requirements.

Contract guidelines and legal counsel review of contracts could help assure that the interests of UW institutions are adequately protected.

Two approaches could be used to assure that UW international education contracts adequately protect the interests of the institution. First, UW System Administration's Office of Legal Counsel could consider developing contract guidelines for

international education programs. The guidelines could describe issues that program administrators should consider and could present model contract clauses for common legal issues. Because each contract reflects the unique characteristics of the individual international education opportunity, guidelines that recognize that administrators need flexibility would be most useful.

Second, NAFSA guidelines suggest that legal counsel review all documents that include a contractual obligation. This review should occur before these agreements are signed by any of the parties. However, access to legal counsel for this purpose may be limited at some UW institutions. Efforts to establish a process by which legal counsel review international education contracts could assure that they protect the interests of the institution. *We recommend that UW System's Office of Legal Counsel develop contract guidelines for international education programs. In addition, we recommend that institutions establish a process to have legal counsel review contracts, as appropriate.*

Program Evaluation and Incident Reporting

Educational institutions do not generally collect data describing the number of deaths and injuries that occur in international education programs.

Administrators and legislators nationally have noted that educational institutions collect very little data describing the number of deaths and injuries in international education programs. As a result, it is difficult to judge the risks associated with study abroad, and this may prevent international education programs from adequately managing health and safety issues. The University of Southern California's SAFETI manual states that it is important for programs to "gain a clear understanding of what happened during the course of the program (crime, accidents, illness, harassment, etc.) to be better prepared to deal with similar situations in the future."

We reviewed program evaluation and incident reporting in UW international education programs to determine the extent to which these efforts are used to monitor health and safety risks. We found that most programs have students complete an evaluation form at the conclusion of the program. However, these forms include very few health and safety questions. Also, only three UW international education programs use a formal incident reporting process to collect information about health and safety problems.

Information collected from student evaluations or incident reports could be used to identify problems; to warn future participants about threats to safety; and to modify programs, as necessary, to

Incident reporting systems and program evaluation efforts that address health and safety issues could help UW international education programs manage health and safety risks.

UW international education programs could share additional information about health and safety issues.

Financial and Administrative Policy (FAP) 45 outlines procedures for the financial management of international education programs.

protect the health and safety of students participating in international education programs. *To improve efforts to monitor risks in international education programs, we recommend that UW international education programs establish both program evaluation and incident reporting methods that effectively collect data about health and safety incidents in international education programs.*

To make the results from the student evaluations and incident reports even more useful, the results could be shared among UW international education programs. One forum for sharing this information could be systemwide conferences covering health and safety issues. UW-Whitewater sponsored a conference on "Crisis Prevention and Response in Study Abroad Programs" in April 1999, and UW-La Crosse sponsored a similar conference the previous year. Another forum could be the UW System's Council on International Education. The Council was established to promote inter-institutional cooperation and includes members from each UW System institution. At systemwide conferences and Council meetings, institutions could discuss specific problems that have been reported, as well as prevention strategies.

Financial Management

UW System Administration Financial and Administrative Policy (FAP) 45 outlines procedures for the financial management of international education programs, provides guidelines for establishing fees, and requires study abroad programs to be financed on a cost recovery basis. Under FAP 45, student fees for study abroad and short-term study tour programs are to be deposited into a program revenue (Fund 128) account and then used to pay the costs associated with international education programs.

At the time of the review, at least three UW System institutions had not established an account for international education programs, as FAP 45 requires. One institution reported that in the past faculty coordinating short-term travel programs had students directly pay the travel agencies providing services for the program. Another reported that students paid tuition directly to the foreign institution. *To assure that international education resources are managed properly, we recommend that each UW international education program review its financial management practices to determine whether those practices are in full compliance with Financial and Administrative Policy 45.*

CONCLUSION

The number of students participating in international education programs is increasing. At the same time, several incidents involving students enrolled in international education programs at institutions in other states have raised concerns about the health and safety of students traveling abroad.

The University of Wisconsin System Administration's policy paper, ACIS 7, outlines several policies relating to student health and safety. Organizations in other states have also identified best practice approaches for protecting student health and safety in international education programs. We compared UW international education program efforts with these guidelines to identify areas that could be addressed to prevent potential problems. Some areas we identified for further consideration include:

- establishing health and safety guidelines for use in assessing international education program sites;
- establishing reasonable and appropriate approaches to identify health and safety issues presented by program participants;
- providing training in health and safety issues for faculty who lead international education programs;
- requiring participants in non-credit programs to complete the UW System Uniform Statement of Responsibility, Release and Authorization;
- purchasing a systemwide insurance policy that would cover accident, health, repatriation and medical evacuation for students in international education programs;
- establishing a contingency fund at each UW institution, as required by ACIS 7.1, and clarifying the use of the funds;
- establishing emergency plans for managing crises;
- assuring that all staff who organize international education experiences follow UW System and institutional policies;

- developing contract guidelines for international education programs;
- assuring that international education contracts are reviewed by legal counsel, as appropriate;
- establishing and improving efforts to monitor risks in international education programs; and
- reviewing financial management practices to assure that the practices are in compliance with UW System Financial and Administrative Policy 45.

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