GIVING AND GETTING: EXAMINING THE CHANGING LANDSCAPE OF
UNPAID MARKETING COMMUNICATION INTERNSHIPS

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Sarah M. Burrows
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Dedication

This doctoral thesis is dedicated to Daniel Jay Borden, an artist and educator, my husband and friend, and the father of our four amazing children.
Abstract

There are numerous pressures put on internship advisers in academia about the ethicality and legality of unpaid internships in the marketing communications for-profit sector. Examined here are the expectations and requirements that college internship advisers have for college-sponsored, unpaid internships, and how their institutional procedures, protocols and practices compare against the guidelines put forth by the U.S. Department of Labor (Department of Labor, DOL, 2010). This study is an exploration of how academic internship advisers ensure that unpaid internships comply with the law and also offer students access to opportunities that provide the marketable skills, pre-professional experience, networking contacts and references that will enable the launch of their careers. This multi-site case study aims to discover the successes and challenges of the study participants regarding the education of the next generation, and the ways in which they contribute to industry by coaching interns on practices that are “industry standards.” New information is also presented on current practices and examples of strategic solutions to the challenges of providing unpaid marketing communication internships in the for-profit sector, within the context of the DOL laws, increased media scrutiny on unpaid internships, and budgetary pressures in both academia and industry since the economic collapse of 2008. The arguments for and against the phenomenon of unpaid internships is examined within the context of several factors, including the return on investment (ROI) in higher education, the acquisition of professional skills for college graduates, industry needs for affordable labor and a pipeline of talent, the Fair Standards of Labor Act of 1937, the unequal access to prime internships for less “well-connected” students, as well as the inability for less affluent populations of students to work for free.

Keywords: unpaid internships, DOL Fact Sheet, adviser, ROI, marketable skills
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Chapter I: Introduction

Background

The history of the cooperative education movement, established in 1906, the history of the role of “interns” in various disciplines, and the U.S. Fair Standards Labor Act of 1937 are interwoven in this Doctoral Thesis. These three threads have brought stakeholders to the uncertain position we are in today with regards to unpaid internships and the impact this uncertainty has on higher education, economic forecasting, and oversight from the Department of Labor. Through the research undertaken here, and a study of the literature on the topic of value derived from unpaid internships, an understanding of the term “intern economy,” (Perlin, 2011) is established.

The Land Grant Act of 1861

The seeds of cooperative education were planted with the Land Grant Act of 1861, which funded colleges devoted to agriculture and mechanical arts, where learning by doing was integral to the mastery of skills. The subsequent integration of experiential learning (Dewey, 1938) into formal academic education has been continuous and, at times, pervasive in all levels of education, as it has proven so effective with certain learning styles and certain disciplines (Yagoda, 2008). Herman Schneider formally founded Co-operative (co-op) education, which combined academics with fieldwork experience, in 1906, at the University of Cincinnati. Parke Kolbe (1940), a lifelong friend to Schneider and past president of Drexel University, honored Schneider by stating “from out of the chaos of innovation in educational method, from amid the unencumbered hordes of real and pseudo-educationalists, there arises at long intervals a man so commanding, so rich in ability and achievement that lesser men must join him to do homage. Such a figure was Herman Schneider” (as cited by Barbeau, 1973, p. 47). Schneider was born in
a coal-mining town in Pennsylvania. While he was identified as possessing the characteristics of an English Quaker and a German scientist, he also had a deep love and appreciation for art and music. As a young child, Schneider worked in his father’s store after school but after his father’s death when Schneider was 14, he went to work in a coal mine as a “breaker boy” (Barbeau, 1973, p. 50). After two years in the Pennsylvania Military Academy, Schneider entered Lehigh University in the Engineering and Architecture program. Schneider’s life history is compelling and rich with evidence of a passionate drive to understand “how things work,” which was later fostered by his mentor at Lehigh University, Professor Mansfield Merriman. Schneider incorporated the mentoring he received from Merriman at Lehigh with the skills gained through a part-time job with an architect and engineer, William Leh, into his philosophy of cooperative education (Barbeau, 1973). This philosophy is evident in Schneider’s writings. As Barbeau (1973) demonstrates, a basic theme comes through over and over—Schneider’s emphasis on the ennobling quality of work, the value of individual achievement, and the blending of study and work. In Schneider’s own words, “work makes the spirit of a man” (as cited by Barbeau, 1973, p. 52). Schneider believed, “if you want to educate a student to become an engineer, then you should provide that student the opportunity to practice being an engineer” (Cooperative Education and Internship Association [CEIA], 2014). The Board of Trustees at the University of Cincinnati reluctantly agreed to a trial run of this educational model. Reilly (2012) asserted that the reluctance was evidenced by the wording of the Boards’ consent, “We hereby grant the right to Dean Schneider to try, for one year, this cooperative idea of education…[for] the failure of which, we will not assume responsibility” (as cited by Onick, 2012, Para 1). In 1906-1907, Schneider convinced 27 engineering students to try cooperative education. Both the students and employers found it to be so beneficial that by 1908, 2,000 applicants inquired about the co-op
program at the University of Cincinnati. This makes it clear that even early on, cooperative education was a successful vehicle for the recruitment of new students. The adoption of cooperative education programs steadily increased through the 1920’s and included 2-year colleges and state universities. Originally developed for engineering programs, co-op education moved steadily into the fields of Medicine, Social Work, Education, and more recently Business, Liberal Arts, and Marketing Communications.

Cooperative education survived the depression and WWII, due in part to the role of the internship coordinator as “he alone bore the responsibility for the placement of these students and, in the last analysis, it was his ability to promote the cooperative plan that kept co-op from disappearing” (Barbeau, 1973, p. 104). Barbeau (1973) sums up the co-op philosophy of education, “The philosophy is simple and direct. There are parts of every occupation that cannot be learned in the academic setting–that can only be learned by practice. To some extent all of life is like this. Some parts of life can only be learned by experiencing life itself” (p. 162). Schneider stated simply “It should not require much argument to show that practice and the theory underlying it should be taught simultaneously, if possible” (as cited by Barbeau, 1973, p. 162).

**Federal Funding for Cooperative Education**

Title VIII of the Higher Education Act of 1965, which established federal funding for cooperative education, was a catalyst for the rapid, national expansion of co-op education across disciplines, as federal funding was readily available and the enthusiasm for the potential of this experience-based learning was growing internationally (Barbeau, 1973). Several professional organizations concerned with cooperative education were founded between 1926 and 1983. In brief, they include: the Association of Cooperative Colleges (1926), the Society of Promotion of Engineering Education (1929), which later became the Cooperative and Experiential Education
Division (CEED) in 2009, the Cooperative Education Association (1963), which later became the Cooperative Education and Internships Association in 1998, and the World Association of Cooperative Education (1983). The National Commission for Cooperative Education (NCCE) was founded in 1963 to promote co-op education and raise funds to run professional development programs and establish co-operative education programs across the country (Barbeau, 1973). The early pioneers for cooperative education, Herman Schneider, Jim Wilson, Edward Lyons, and Clement Freund, were followed later by Ralph Tyler, Donald Hunt, and Frank Jakes, who spent time in the early 1960’s in Washington D.C. pushing the co-op agenda and connecting with legislators involved with educational policy and funding. These efforts resulted in federal funding for co-op programming from the Title VIII Act of 1965, as well as a $30 million, federally funded advertising campaign promoting cooperative education in 1985 (CEIA, 2014). The number of co-op programs grew from 277 in 1971 to 1012 in 1986. The late 1980’s saw a decline of Title VIII federal funding for cooperative education, due to federal budget cutbacks and allocation of funds to other educational initiatives. Colleges and universities had to become more self-sufficient in supporting co-op education and internship programs. Due in part to the decline of Title VIII funding, there was a need for the co-op movement to diversify and the model of internships was formally partnered with co-op education in the 1990’s as colleges and universities found alternative ways for students to participate in work-based learning that was more cost effective to administer (Cates & Jones, 1999). The variety of programs fostering experiential learning and experiential education has since blossomed in higher education.
Co-op or Internship

Most practitioners in the field of experiential education consider the history of cooperative education to be one and the same as the history of internships. The educational philosophy behind both co-ops and internships is similar—the differences lie in the structure and the administration of the two applied learning experiences. While co-ops have traditionally been compensated, and often do not carry academic credit, unpaid internships, associated with earning academic credit, took hold in the 1980’s. Educators saw the benefits of experiential education and developed more ways in which to integrate this educational approach into their curriculum. Many professionally oriented, liberal arts programs developed experiential learning outcomes, specific to each discipline, that could be monitored through faculty oversight, with academic assignments aligned with field-based learning. These experiences carried academic credit and were scheduled alongside other classes. A student did not leave campus for a full-time placement that lasted for several months—usually a semester—as was the case with a co-op placement.

Since 1981, when one in 36 college graduates had completed an internship, the number had risen to one in three by 1991, and over one in two by 2009 (Curiale, 2010). In 2008, findings in the *The New York Times* indicated that 83% of graduating college students had completed at least one internship, and often more, with approximately 50% of these unpaid (Greenhouse, 2010). These figures, estimated by Perlin (2011) to be one to two million internships annually in the U.S., “Do not begin to account for internships taken by community college students, graduate students, recent graduates, and others” (p. 27). The phenomenon of unpaid internships clearly impacts a large segment of the U.S. “learning population,” as well as this population worldwide. Experiential education in the form of internships, co-ops, work-integrated learning, externships, and work-based learning has seen an upsurge in Europe, Australia, and most of the developed
world (Smith, 2006). It is a commonly held viewpoint that a college internship has become a requirement for finding employment in most industries (Collegiate Employment Research Institute [CERI], 2009). Internships were commonplace only in medicine, law, and education twenty years ago, have become standard practice in most fields of study (Weible, 2009).

**The Origin of The Term**

The term “interne” originated in the field of medicine as early as 1865, borrowed from the French, to label the Doctors in training, who were literally interned (i.e. confined) to the four walls of the hospital during their two years of relentless training (Perlin, 2011). The term intern has come to represent a broader concept, and sends out a more targeted social signal, which holds social capital and value, regardless of its ambiguity (Coco, 2000). Students do not seem bothered by this ambiguity and “seem to grasp the inadequacy of any particular definition—an internship is understood more in terms of the cultural and professional function of an internship than in terms of actual responsibilities: a box that has to be checked, a rite of passage, a prerequisite for future ambitions” (Perlin, 2011, p. 25). It appears that the ambiguity in the definition of the term “intern” does not impact the allure for students, employers, and academic advisers alike, as the rhetoric associated with internships, as a way to “build your resume,” “a way to get great experience,” get “a foot in the door,” (Perlin, 2011, p. 23) has been taken at face value until the past few years. The allure has been challenged as the number of unpaid internships has exploded, resulting in a greater impact on the economy, reports of inadequate learning outcomes and abuses of the unpaid internship position have surfaced, and the issues of the socio-economic inequality that unpaid internships present have become more obvious.
**Fair Standards Labor Act of 1937**

The other backdrop for this study is the Fair Standards Labor Act of 1937 (FLSA), which President Franklin D. Roosevelt pressed Congress to pass and argued, “Our nation, so richly endowed with natural resources and with a capable and industrious population, should be able to devise ways and means of insuring to all our able-bodied working men and women a fair day’s pay for a fair day’s work” (as cited by Curiale, 2010, p. 101). This law, carried out in practice by the Wage and Hour Division (WHD) of the U.S. Dept. of Labor, has ambiguous provisions that cover unpaid internships, and Fact Sheet #71, written in 2010, (Appendix A: Department of Labor (WHD) Guidelines) that does cover unpaid internships, is challenging to adhere to. This Fact Sheet is a reissuance of guidelines established in 1947 by the Supreme Court case, *Walling v. Portland Terminal Co.* that “set the groundwork for unpaid internships,” in which the court determined, “trainees were not employees within the FLSA Act of 1937” (Bacon, 2011, p. 72). This case involved applicants to the Portland Railroad Co., who were required to go through an eight-day, unpaid training in which they “shadowed employees, observing, and eventually doing some supervised work” (Curiale, 2010, p. 109). The trainees claimed in the suit that they were entitled to minimum wage for the training, but the Supreme Court ruled against them, noting they were not found to be employees under the FLSA, as the railroad received “no immediate advantage from the trainees work” (Curiale, 2010, p. 110). Congress sought to protect workers by passing the Fair Standards Labor Act and in addition “to prevent market forces from driving down the minimum wage” (Curiale, 2010, p. 124).

With the economic collapse of 2008, as paid positions have been fewer and more difficult to secure, more students, college graduates, and even young professionals have been willing to complete unpaid internships to build their skills, experience, and networks (Stewart & Owens,
This explosion of unpaid internships and an increasing number of both college students and graduates willing to compete for unpaid internships has resulted in this very outcome, driving down the minimum wage (Braun, 2011). The other liability for interns as non-employees within the FLSA Act of 1937 is that, according to Edwards and Hertel-Fernandez (2010), they are “not protected in the workplace from discrimination and harassment under Title VII of the Civil Rights Act of 1964” (as cited by Bacon, 2011, p. 81). The forces and outcomes that maintain the “intern economy” (Perlin, 2011) and encourage this labor practice to be perpetuated are equally as real. There are persuasive arguments with supportive data on both sides of the unpaid internships debate, which will be discussed in the literature review of this thesis. This study addresses how academic internship advisers are adjusting their practices, protocols, and philosophy concerning unpaid internships in relation to the DOL laws, and in light of increased media scrutiny over the past few years.

**Statement of the Problem**

Ambiguities about the value of an unpaid internship, the meaning of the label “intern,” as well as the ambiguity in the language of the Department of Labor laws governing unpaid internships, permeate this problem of practice. These ambiguities have resulted in confusion amongst academic internship advisers about how to work with students who pursue and participate in unpaid internships (Svacina, 2012). This ambiguity can be interpreted in various ways and is useful for employers as “it simultaneously allows for labor of many kinds, ranging from mundane to professional tasks, completed by individuals with varying levels of commitment, interest, and ability” (Frenette, 2013, p. 390). The increased scrutiny of unpaid internships (Schorr, 2012), as well as the explosion of the phenomenon in the past two decades (Curiale, 2010), has intensified the confusion. Yet to be identified is an alternative, clear path for
students to garner the professional experience, skills, and maturity that are potential outcomes of an unpaid internship and a requisite to secure a professional job in the marketing communications field. The unpaid internship phenomenon is supported by the belief that one builds a “stock of social and cultural capital that may yield monetary returns in the future when the intern enters the labor market proper” (Fink, 2013). This concept of pay it forward, while ambiguous, is central to the arguments in support of unpaid internships. The idea is that while the immediate work one completes, as an unpaid intern is not compensated, this work will lead to future opportunities that will be paid. This argument is fueled by the belief that without completing this unpaid work, the intern will not acquire the experience needed to secure the paid work in the future (Coco, 2000).

Criteria for the Unpaid Internship

The DOL Fact Sheet #71 (Appendix A) outlines a 6-point set of criteria for unpaid internships, referred to by many as a “test,” that employers must follow in order to be in compliance with the law. The criteria of the DOL Fact Sheet #71 include,

1. The internship, even though it includes actual operation of the facilities of the employer, is similar to training, which would be given, in an educational environment.
2. The internship experience is for the benefit of the intern.
3. The intern does not displace regular employees, but works under close supervision of existing staff.
4. The employer that provides the training derives no immediate advantage from the activities of the intern; and on occasion its operations may actually be impeded.
5. The intern is not necessarily entitled to a job at the conclusion of the internship.
6. The employer and the intern understand that the intern is not entitled to wages for the time
spent in the internship (DOL, 2010).

In addition, in 2011, the National Association of Colleges (NACE) established a position statement about unpaid internships as well as a 7-point set of criteria that must be in place for an internship to be considered legitimate. It appears that NACE was responding to pressure from current students, potential students, and the Obama administration (Braun, 2011) to better demonstrate a return on investment in higher education, including the practice of academic internships. The position statement reads,

An internship is a form of experiential learning that integrates knowledge and theory learned in the classroom with practical application and skills development in a professional setting. Internships give students the opportunity to gain valuable experience and make connections in professional fields they are considering for career paths; and give employers the opportunity to guide and evaluate the student. (National Association of Colleges and Employers [NACE], 2014)

The following criteria have been developed “To ensure that an experience—whether it is a traditional internship or one conducted remotely or virtually—is educational, and thus eligible to be considered a legitimate internship by the NACE definition,”

1. The experience must be an extension of the classroom: a learning experience that provides for applying the knowledge gained in the classroom. It must not be simply to advance the operations of the employer or be the work that a regular employee would routinely perform.

2. The skills or knowledge learned must be transferable to other employment settings.

3. The experience has a defined beginning and end, and a job description with desired qualifications.
4. There are clearly defined learning objectives/goals related to the professional goals of the student’s academic coursework.

5. There is supervision by a professional with expertise and educational and/or professional background in the field of the experience.

6. There is routine feedback by the experienced supervisor.

7. There are resources, equipment, and facilities provided by the host employer that support learning objectives/goals (NACE, 2014)

The challenge arises when one examines how a student actually learns and develops (Dewey, 1938, Kolb, 1984, Eraut, 2004, Dreyfus & Dreyfus, 1980) through an internship, and whether these two sets of criteria fully enable that learning and development process. Another aspect of the problem in establishing the value of unpaid internships has to do with social equality and fairness. Some students cannot afford to work 15+ hours a week without monetary compensation. The reality that the potential benefits reaped (experience, skills, contacts, and references) are not accessible to all students is an issue of social justice that cannot be ignored. Issues of social justice emerge from the practice of unpaid internships, as students without means cannot always afford to work for free, perpetuating a cycle of social and economic immobility (Fink, 2013). A study conducted by Intern Bridge, “The Debate Over Unpaid College Internships,” found that in addition to the issue of compensation, more privileged students had greater access to “key resume boosting internships” (Gardner, 2011), further perpetuating social inequality. An unpaid summer internship, given the loss of wages, as well as the living costs for a summer, is often too great a price for less affluent students, and these professional growth opportunities are denied this socio-economic group (Edwards & Hertel-Fernandez, 2010).

Lastly, it is of paramount importance for colleges to be able to document the educational
benefits of academic internships, and demonstrate the contribution those have made to the students’ ability to secure professional employment. This documentation is so crucial, as accountability in education has become more prevalent with the reauthorization in 2010 of The Higher Education Act (HEA) of 1965, as documented in “Program Integrity: Gainful Employment—New Programs, Final Regulations” in The Federal Register (Fenwick & Gartin, 2010). All practices in higher education have become subject to increased local, state, and federal regulation. This regulation covers programs related to student aid, accreditation (credit hour, state authorization, misrepresentation), and outcomes related to degree programs actually leading to gainful employment. Understanding the desired learning outcomes of an internship guides best practices for students, employers, and faculty advisers, and is timely in regard to current legislation.

**Significance of the Problem**

Practitioners in academia are currently struggling with the question of whether they will see the “death of the unpaid internship” (Adams, 2013). This has major implications in the marketing communications field, as a majority of these internships are currently unpaid. Many industries, which have an allure of glamour such as publishing, PR, advertising, and entertainment, can more readily attract a supply of interns without having to offer compensation (Allen, 2014, Maynard, 1998). Employers have felt more secure if the internship is credit bearing, with the implication that it is an educational experience, and, therefore, falls loosely within the guidelines of the DOL law (DOL, 2010). Not all for-profit, marketing communications firms require college credit, however, and for these entities, the implications of the law are more threatening. Certain tenets of the law are in direct conflict with how students have heretofore learned through an internship. Some employers and academic internships
advisers are exerting pressure on the DOL to change item #4 on the list of criteria. Their argument is that the language “The employer that provides the training derives no immediate advantage from the activities of the intern; and on occasion its operations may actually be impeded,” (DOL, 2010) is nonsensical as it is almost impossible for a student to achieve the necessary learning outcomes, as dictated by the academic institutions, if they do not perform work where the employer “derives no immediate advantage from the activities of the intern” (DOL, 2010). In addition, future employers will want to see evidence of certain skills acquisition from an internship when they consider a college graduate for hire (Swanson & Tomkovick, 2011, Dillon, McCaskey, & Blazer, 2011, Nettleton, Litchfield, & Taylor, 2008). It is imperative that this conflict be resolved, so that all stakeholders–students, employers, and academic institutions, may continue to reap the potential benefits of an educational, unpaid internship. The pervasive nature of unpaid internships deepens the significance of the problem; nearly 20% of for-profit organizations with over 5,000 employees hire unpaid interns (Perlin, 2011) and in 2013, 66% of college graduates participated in an internship or co-op, almost 50% of which were unpaid. Of these, 38% were with private, for-profit companies (Mangan, 2014).

**Purpose Statement**

This study identifies the learning outcomes and professional benefits gained from unpaid marketing communication internships as identified by academic internships advisers and how these compare with the criteria set forth by the DOL Fact Sheet #71 (DOL, 2010). The ambiguity of the value associated with unpaid internships, for all stakeholders, is compounded by the ambiguity of the language of the DOL Fact Sheet #71. The benefits and the drawbacks of unpaid, marketing communications internships are examined, and alternatives for achieving the learning outcomes, and professional skills development associated with these internships, are explored.
This study addresses the challenges for those in academia who advise interns about the future viability of unpaid marketing communication internships in for-profit organizations in light of the U.S. DOL Fact Sheet #71 (DOL, 2010).

Through a multi-site case study, in which participants from several sites contributed their perspectives and experiences, potential solutions to the dilemmas facing practitioners in academia working with students completing unpaid internships were discovered. Through an examination of the literature on the DOL laws, stemming from the FLSA of 1937, including criteria for unpaid internships, this study unveils the ambiguities in the language of the DOL Fact Sheet #71 and other aspects of unpaid internships, such as the lack of protection from discrimination and harassment under Title VII of the Civil Rights Act of 1964 (Edwards & Hertel-Fernandez, 2010). The challenges for practitioners to ensure that students gain access to field experiences, which yield marketable skills and a potentially greater return on investment from their college education, is discussed.

**Theoretical Framework**

There are many lenses through which to examine learning by doing: experiential learning (Kolb, 1984), informal learning (Eraut, 2004), social development theory (Vygotsky, 1978), social learning theory (Bandura, 1977), situated learning theory (Lave and Wenger, 1991), and the 5-stage model of learning (Dreyfus & Dreyfus, 1980), among others. This study uses the lenses of informal learning (Eraut, 2004) and the 5-stage model of learning (Dreyfus & Dreyfus, 1980) to study this problem of practice. Eraut (2004) defines informal learning as being on one end of a spectrum of a continuum of formality, which includes “implicit, unintended, opportunistic, and unstructured learning, and the absence of a teacher” (p. 250). This theory incorporates what is being learned, how it is being learned, and factors affecting learning in the
workplace. The 5-stage model of learning (Dreyfus & Dreyfus, 1980) identifies a series of stages of skill development from novice, to competence, to proficiency, to expertise, to mastery, which may be attained through an internship or other forms of field-based learning. One goal of an internship is the development of discipline specific skills; looking at the stages of learning an intern moves through in relationship to this model will allow for an examination of the issue pertaining to the educational value, i.e. the ROI, of an unpaid internship.

**Research Design**

A qualitative, multi-site case study of academic internships from the perspective of internship advisers was conducted in order to gain a deeper understanding of how the landscape of unpaid internships is changing within the context of the DOL Fact Sheet #71 (DOL, 2010), increased media scrutiny, and increased pressure for a return on investment from a college degree. The requirement in the case study method to collect data from several sources stems from the need to build “an in-depth picture of the case” (Creswell, 2012b, p. 162). In addition, a thorough collection of several data points lends credibility to the study and challenges the notion that qualitative research is not scientifically sound (Creswell, 2012b). In order to use case study methodology, one must have a clear case, which is bounded by time and place (Merriam, 1998), and allows for a case analysis of the problem. The data was collected from a variety of sources (Creswell, 2013), and a theoretical framework guided the research process (Yin, 2009).

**Research Questions**

The following research questions guided the direction of the study:

1. Have guidelines for unpaid internships, reissued in 2010 by the DOL, impacted the practices of internships advisers?

2. How closely aligned are the intern’s learning objectives with
   a) the internship roles and responsibilities provided by employers?
b) the guidelines for unpaid intern’s roles and responsibilities set by the US Department of Labor?

3. Have DOL guidelines for unpaid internships impacted the availability of internship opportunities, and if so, what are the likely consequences?

**Significance of the Study**

This study has significance for many different stakeholders. The stakeholders are loosely identified here as college interns, academic institutions, employers, the Department of Labor, and individuals committed to issues of social justice. The explosion of unpaid internships in the past few decades, and the perceived requirement to possess experience and skills acquired through an internship to secure professional employment after college, have resulted in strong arguments for and against the phenomena of unpaid internships. The arguments that support the existence and continuation of unpaid internships are, a) the promise of a greater return on investment (ROI) from a college degree through the completion of an internship, b) the acquisition of professional skills, knowledge, and confidence that can only be attained by students in a field work experience, c) employers’ need for immediate labor at minimal or no cost, and d) employers’ desire for a pipeline of talent through past interns, as well as through the relationship and ongoing communications with an academic internship adviser who may refer subsequent interns. The arguments that work against the existence and continuation of unpaid internships are, a) the DOL laws governing unpaid internships, specifically criteria #1 and criteria #4 (DOL, 2010), b) those committed to challenging issues of social justice, and c) corporate employment guidelines, which require confidentiality of all personnel who must be “employees,” and would disallow unpaid internships. The findings of this study should be relevant to all stakeholders who are impacted by these arguments for and against the phenomenon of unpaid internships.
Limitations

A limitation in this study was the relatively small number participants that were surveyed and interviewed. A second limitation was that while the bounded system that comprised the case for this multiple case study is made up of three entities—the intern, the employer, and the internship adviser—primary data was only collected from the internship advisers. Secondary data on the attitudes and perspectives of the employers and the interns was gathered through the survey and interviews with the participants, all of whom are internship advisers.

A limitation inherent in open-ended interview questions is that while they provide narratives in which quotes may be obtained, the responses can be difficult to code and aggregate (Stake, 1995). In turn, questions focused on understanding a particular situation draw attention to that particular setting, but may not be useful in generalizing about all situations. The final report includes generalizations about the perceptions of internship advisers as a whole, but careful attention has been paid to indicate individual perceptions within each case and provide contextual details from the in-depth interviews.

A limitation in criterion sampling is that although the cases were chosen based on meeting the criteria for the study, not all those selected for the study chose to participate or fully complete the survey. The goal was to collect responses from 20 surveys, a 33% response rate, and the actual number of surveys completed was 17, a response rate of 28.33%. With the initial invitation to participate in the study, a link to the survey was included. One week prior to the submission deadline, a reminder email was sent to encourage all those who had been originally recruited to complete the questionnaire. Once the surveys were collected, eight participants selected for interviews were contacted. The original goal was to conduct interviews with six internship advisers. The researcher included two extra participants, in the event that there were
issues with the participant interviews. Both back up interviewees were enthusiastic about participating, so in the end, eight interviews were conducted and those responses were all included in the results. The interviews were conducted in person, at the advisers place of work, or by telephone, and professionally transcribed without any major issues.

Online surveys can be limited by the respondents’ willingness to participate in web-based surveys or ability to use new technology (Lefever, Dal, & Matthiassdottier, 2007). The number of questions was kept to a small number of important questions based on the research questions set forth for the study. Short questionnaires addressing only the required data help establish data reliability by keeping respondents focused and interested in completing the survey (Lefever et al., 2007). The interviews were also designed to collect only data relevant to answering the research questions for this study (Seidman, 2013). The temptation existed to pose questions that addressed topics that will be addressed in subsequent research. The responsive interviews (Rubin & Rubin, 2012) were designed to last for one hour, out of respect for the participants’ time. The researcher developed a list of interview questions (Appendix F: Interview Questions for Academic Advisers) to use as a guide for the responsive interviews (Rubin & Rubin, 2012), yet different original questions and follow up questions were posed to each participant, based on the way the conversation was evolving.

**Summary**

This study examined a complex phenomenon, primarily through the experiences and perspectives of academic internships advisers. These participants provided the viewfinder into the changing landscape of unpaid academic internships in the marketing communications sector.
This study discovered new strategies to guide college students toward potential avenues for acquiring the necessary skills and experience to secure professional marketing communications jobs if, in fact, unpaid internships become scarce. This study discovered potential solutions to the ambiguity and resulting confusion of the DOL Fact Sheet #71 (DOL, 2010), possibly requiring that the guidelines apply to non-profits and government agencies, implementing a different kind of balancing test, or leaving regulation in the hands of colleges and universities (Bacon, 2011). Increasingly prevalent as well as problematic, some believe that the Wage and Hour Division (WHD) of the DOL should create clear rules regarding unpaid internships and “memorialize its prior opinion letters in a binding regulation, create a new ‘intern-learner’ category under the FLSA, and declare once and for all that the six-factor test is an all or nothing requirement” (Curiale, 2010, p. 128). The oversight and regulation of the guidelines set forth in the DOL Fact Sheet #71 (DOL, 2010) is currently inconsistent, so it remains largely ignored except by plaintiffs in current cases in litigation (Curiale, 2010).

This study is comprised of five chapters, as is typical for doctoral theses. This first chapter presents an overview of the history of cooperative education and internships, and presented the research questions, the purpose of the study, and the significance of the study for practice, scholarship, and policy, and finally, the design of the research study. Chapter Two presents a comprehensive literature review of experiential education, assessment of work-based learning, and how these intersect with the Fair Standards Labor Act of 1937. In Chapter Three the research design and theoretical frameworks, which guided the study, are presented. Additionally, a description of the cases and the participants involved are presented. The results from the survey, and the interviews are presented and discussed in Chapter Four. Chapter Five
concludes this thesis with a discussion of the implications of the findings for scholarship, practice and policy as well as recommendations for further research.
Chapter II: Literature Review

A comprehensive review of the literature about experiential learning in higher education, referred to by many different terms–internships, work-integrated learning, work-based learning, co-ops, and externships–revealed a complex set of inter-related themes, perspectives, and issues that come from and impact different sectors of society, the federal government, academia, and industry. Over the past 50 years, there has been a surge of experience-based learning, as identified by Dewey in 1938, incorporated into the curricula of most colleges and universities around the world. Dillon, McCaskey, and Blazer (2011) proclaim that since 1988, there appears to be “a significant increase in the number of Association to Advance Collegiate Schools of Business (AACSB) accredited MBA programs offering internships” (p. 48). Nettleton, Litchfield, and Taylor (2010) state, “Since the 1990s universities have faced increasing pressure to better prepare graduates for the workforce. Employers, professional societies and the government are increasingly calling for graduates who are work-ready” (p. 519). The growing pressure for academia to produce work-ready graduates has emboldened practitioners of experiential education to deliver on this need. There is a wide variation between how these programs are administered, how many academic credits are granted, the terms used to identify the pedagogy behind experiential education, and the respect these programs garner within the traditional academic community.

This review emphasizes what was discovered specifically about the phenomena of unpaid internships. To address the challenges presented by unpaid internships, all three stakeholders, academia, industry, and students, must work together (Braun, 2012). The role of higher education in the preparation of each generation to contribute to society with mindfulness, capability, self-discovery, and a respect for others, while attaining discipline specific knowledge
and skills as well as the ability to earn a living wage, is a cornerstone of this literature. The role of the federal government and the Department of Labor in the protection of civil rights, and enforcing regulations that ensure the viability of the lives of working citizens, is another cornerstone. The needs of industry to recruit reliable, capable, forward thinking employees to support their organizational mission and work towards improving the bottom line is another cornerstone. Those who work towards raising and improving the consciousness of all stakeholders about the social justice issues associated with unpaid internships to ensure greater social, economic, and political equality for all people are the fourth cornerstone of this literature review.

The issue of unpaid work as a transition from education to a profession has become an issue across the developed world. This phenomena of unpaid work as a bridge from university to career has become a more pressing issue since the global economic collapse in 2008, and impacts society and the next generation on several levels (Stewart & Owens, 2013). This review is separated into categories in the hope of keeping the inter-related themes, perspectives, and issues clearer for the reader. The categories are not cleanly divided, black and white concepts, so the reader will discern overlaps between the benefits and drawbacks of internships, as well as the ensuing categories outlined below.

**Documentation**

The literature search was conducted using university libraries, online publications and scholarly journal databases utilizing Boolean logic with key words, terms and phrases that included, but were not limited to: *labor laws, paid internships, unpaid internships, value and education, marketing, communications, field experience, intern, practicum, cooperative education, experiential learning, work integrated learning, and work placement*. Databases
searched included EBSCOhost, ERIC, Gale Academic OneFile, Google Scholar, HeinOnline, ProQuest, Sage Journals Online, the article databases of the Asia-Pacific Journal of Cooperative Education (APJCE: www.apjce.org) and Journal of Cooperative Education and Internships (JCEI, www.ceiainc.org/journal.asp), and The International Handbook For Cooperative and Work-Integrated Education (Coll & Jegwaard, 2011b).

**Benefits of Internships**

All the stakeholders impacted by this problem of practice–students, employers, and academic institutions–derive some benefits from academic internships (Coco, 2000). From a different perspective, some of these benefits could be described as drawbacks. The benefits and drawbacks of internships also fall into the categories broken out in this literature review. Internships benefit students in terms of a higher employment rate upon graduation and working in more favorable positions (Weible & McClure, 2011). Swanson and Tomkovick, (2011) asserted that in the employer’s view, full-time job applicants with an internship experience are strongly preferred over those lacking this credential (NACE, 2009). Evidence suggests that students are more engaged in the classroom after completing an internship (Kessler, Danko & Grant, 2009). Students themselves perceive that they “gain valuable, real-world experience; schools provide popular learning opportunities and students benefit from closer connections with alumnae” (Frenette, 2013).

Academic institutions benefit from increased retention due to successful internship placements (Weible, 2009) and additionally, a favorable internship placement record can be an effective marketing tool for prospective students (Edwards & Hertel-Fernandez, 2010). Swanson and Tomkovick (2011) found that graduating students who have been in internship programs report that they adjust more quickly to the professional workplace, as they hit the ground running
upon hire, and save valuable training time and resources (Dixon, Cunningham, Sagas, Turner, & Kent, 2005). Employers save approximately $2,000 on training costs by hiring a previously vetted intern (Gregory, 1998). Internships also allow a student to be “test-driven” by the employer to see if they are a good fit for the company culture (Kessler et al., 2009). It has been demonstrated that there is greater retention amongst internship hires (D’Abate, Youndt, & Wenzel, 2009) and interns have the same criteria for workplace satisfaction as full time employees. Interns bring in fresh perspectives, as well as new, relevant technology skills into the workplace (Bey, Robertson, Walker, & Young, 2010). Lastly, internships also offer an outlet for supervising employers to be mentors and advocates, which can be personally and professionally satisfying (Wong, 2011). Arguably, the most pervasive benefit outlined in the literature is the improved chances for college graduates to secure professional employment after completing one or more internship (Weible & McClure, 2011).

**Drawbacks of Internships**

There are certainly drawbacks associated with internships, in particular, unpaid internships. Unpaid internships have been criticized as being exploitive and exacerbating a weak labor market (Fink, 2013), which is in conflict with the goals of the Fair Labor Standards Act (FLSA) of 1937. Without increased oversight and different regulation of unpaid internships, this phenomenon may negatively impact the economy. Unpaid internships may add to increasingly high student debt, as students spend hours each week working without pay, when that could be time spent earning money, which eventually reduces spending power and hurts the economy (Tucci, 2011). The valuable, practical experience promised as an outcome of an unpaid internship is at times illusory, and without adequate oversight and assessment of learning outcomes, these promises can go unchecked. There is tremendous inconsistency between
Internship experiences, which is usually hard to predict, even for seasoned internship advisers (Braun, 2012). Some internships provide greater benefits for students who are undecided in their career path, as the internships encourage professional focus. Other internships only reward those already focused, highly motivated, and directed students who know what they want to pursue professionally. Given the disparity among unpaid internship experiences, there must be a greater effort to eliminate the “bad” internships without jeopardizing and interfering with the “good” internships (Braun, 2012). The question remains: Where does accountability for this effort lie? Increased oversight and employer-academic internship adviser communication requires increased time and resources for all parties, at a time when budgets in government, industry and academia have been shrinking. While there appears to be consensus that greater oversight of the learning experiences promised to, and gained by, students through unpaid internships is needed, there does not seem to be any clear stakeholder group yearning to take that oversight on.

**Accountability of Academia**

Academic institutions generate revenue from the tuition charged for academic internships and some would argue that the commitment for supervising and guiding internships is minimal (Agle, Hart, & Thompson, 2014). Backman and Eliason (2012) assert, “It is a cost effective way for schools to offer practical experience, but the ethical concerns raised by encouraging students into free labor are mirrored by similar concerns about the appropriateness of universities taking tuition dollars from students for learning experiences they are not themselves providing” (as cited by Agle, et al., 2014, Para. 33). There are currently six major higher-education groups, led by the American Council on Education, who are “weighing in on a pair of cases before the U.S. Court of Appeals for the second circuit that could limit colleges’ ability to integrate unpaid internships with companies into their curricula” (Mangan, 2014, Para. 2). In fact, Columbia,
Harvard, and Yale Universities no longer offer academic credit for unpaid internships because of the complexity involved with potential litigation their students may become involved with.

The two cases of unpaid interns—against Fox Searchlight Pictures and the Hearst Corporation—sparked this action. In the first case, the ruling gave class action status to the interns. A lower court dismissed the second case (Mangan, 2014). There are several other cases currently in the courts, and the responses from employers to these recent occurrences has been to a) shutter their internships programs altogether, b) start paying interns minimum wage, or c) require students receive academic credit for their unpaid internship. There are repercussions from each of these solutions that directly impact students hoping to gain professional experience prior to graduating from college. Higher-education groups say that the cases before the court “could help separate true educational experiences from exploitive, thinly disguised evasions of the labor law” (Mangan, 2014, Para. 22). Certainly current litigation is highlighting some of the drawbacks of unpaid internships for all involved, interns, colleges, employers, and the courts.

**Return on Investment (ROI) From a College Degree**

In 2010, a survey of 300 career professionals, conducted by internships.com, a commercial company that provides various services to stakeholders in both academia and industry, indicated that 98% employers favored applicants with internship experience, however 46% of these respondents found the federal guidelines for unpaid internships to be unrealistic (Bacon, 2011). Internships.com hosts a database of internship opportunities, enables students to post resumes to their accounts, and access tips on the job search process. Cameron (2013) found that internships can “improve students generic skills, career skills and prospects, self-efficacy and professional awareness, and reduce the students risk of selecting the wrong career path” (p. 137). The investment in field-based learning has value, as it exposes a student to a professional
and relevant workplace, experts in their field, authentic tasks are undertaken, and workplace norms and culture are learned; this all leads to the development of a professional identity (Zegwaard & Coll, 2011). The critical thinking, written, and oral communication skills, combined with the practical experience gained in the internship, made graduates more employable, according to Raymond, McNabb, and Matthaei (1993). Raymond et al. (1993) found additional benefits to graduates who had completed internships, through the exposure to ethical issues and global dimensions that were not gained through classroom learning (as cited by Krouse & Fortenot, 2008). Gault, Redington, and Schlager (2000) found that graduates with internship experience could “earn higher salaries and experienced higher job satisfaction in subsequent jobs (as cited by Krouse & Fortenot, 2008, p. 62). There are many examples of an internship leading directly to a job. Mangan (2014) described one Boston University graduate who had completed five unpaid internships in four years, two for academic credit. The student never “felt exploited,” and one of the internships led to a fulltime job at a local lifestyle magazine (Para. 5). Many college graduates attribute their professional acumen to their internship experiences, and many feel they won their first professional jobs, as a result of their internship experiences.

Marketing Communications Internships

While there is a plethora of unpaid internships in all fields, Curiale (2010) notes the increased prevalence “especially in ‘glamorous fields,’ such as politics or entertainment” (p. 103). The marketing communications fields that could be considered “glamorous” are broadcast, public relations, journalism, entertainment media, magazine publishing, and inbound marketing/social media (Intern Match: State of the Internships Report, 2014). But the glamor of these industries can wear off through an unpaid internship, as Prato (1996) detailed in one
intern’s statement about working at a television station: “This is a one year internship, and you learn everything in less than one month. Then for the other eleven months, you are doing a job you should be paid for” (as cited by Gregory, 1998, p. 242). Certainly, it is the responsibility of the intern to take the initiative and continue to learn as much as possible and explore professional development opportunities for the duration of any internship.

The Pressures for Industry

While the demand for unpaid interns has exploded across all industries in the past few decades, due to the recessions in 2002 and 2008, the reissuance of the FLSA guidelines with Fact Sheet #71 in 2010 have made it drastically more difficult to run unpaid internship programs as certain criteria are ambiguous at best and impossible to meet at worst (Bacon, 2011). The DOL criteria #4, “The employer that provides training derives no immediate advantage from the activities of the intern…” (DOL, 2010) is a disincentive to sponsor an unpaid intern. Employers logically need to derive some kind of benefit from the intern’s activities or they would not be willing to provide access to the company, office space, supervision, or evaluative feedback to the intern. Employers are not in the business of education, and are therefore not obligated to concern themselves with the education of the next generation. There are however some clear benefits to be derived from hosting an internship program from a business perspective. Interns provide a ready-made pipeline of talent that “represents an already trained workforce that can make an immediate contribution to an organization, at tremendous cost savings” (Cunningham, Dixon, Kent, Sagas, & Turner, 2010, p. 48). There is time and opportunity costs that come with the supervision of interns, but many employers see this as an investment in their future work force, and cheaper than traditional recruitment methods (Cameron, 2013). Given the numerous benefits that employers have derived from hosting unpaid internships, there is certainly reluctance to
disband the practice. In order to be in compliance with the DOL Fact Sheet #71, employers have switched to a) offering fewer internships, if they are paid, b) making the internships more of a job-shadowing experience, or c) doing away with internship programs altogether (Bacon, 2011).

**Social Justice Issues**

Issues of inequality are prevalent in marketing communications as well as other industries, according to Arum, Cho, Kim & Roksa (2012), in an era “where transition from school-to-work, long seen as tenuous for students who do not attend college, is becoming problematic even for graduates from four-year institutions” (as cited by Frenette, 2013, p. 391). Unpaid internships limit the applicant pool to those students who can afford them, and they institutionalize economic disparities beyond college (Edwards & Hertel-Fernandez, 2010). Given the vital importance of internships when seeking employment, low-income students are at an additional disadvantage (Bacon, 2011). Yamada (2002) has described unpaid internships as creating a “sharp class divide” between students who can afford to complete an unpaid internship and those who cannot (as cited by Curiale, 2010, p. 105). Bacon (2011) quoted Ross Eisenbrey of the Economic Policy Institute “if you can’t have an unpaid internship because you need to work, you’re poor, or your family just doesn’t have the means, you’re cut out, and that’s wrong” (Institute for Public Policy Research [IPPR], 2014, p. 86). Gregory (1998) compared unpaid interns to child labor, “unlike the more blatant forms of labor exploitation, student intern labor is a more subtle, but perhaps equally persuasive, manifestation of the contemporary exploitation of labor in capitalist political economy today” (p. 229). Farley (2010) asserts, “the unpaid internship excludes a wide socioeconomic swath from gaining useful experience and making connections; it simply reinforces the divide between the haves and the have-nots” (as cited by Bennett, 2011, p. 298). A policy lever that could address the socio-economic barrier to low-income students
having access to unpaid marketing communication internships would be the introduction of “Federal Intern Study,” which could provide governmental issued subsidies to students in need to complete internships at non-profits or government agencies, enabling these students to gain marketable skills and experience while also promoting public service (Edwards & Hertel-Fernandez, 2010). This could be modeled after the Free Application for Federal Student Aid (FAFSA) funding, which is allocated to college tuition. This initiative would not, however, address the issue of access in for-profit, marketing communications companies in the broadcast, PR, advertising, and journalism industries, in which many students want to gain experience.

**Department of Labor (DOL) Laws**

The acting administrator of the WHD, Nancy Leppink, was quoted in numerous articles, “if you’re a for-profit employer or you want to pursue an internship with a for-profit employer, there are not going to be many circumstances where you can have an internship and not be paid and still be in compliance with the law” (as cited by Bennett, 2011, p. 310). The Pittsburgh director of the WHD found that out of 800 labor investigations conducted in twenty-four counties in western Pennsylvania “80% of the employers were found in violation of the FLSA” (O’Connor, 1997, p. 261). Most of the literature reviewed had the six criteria laid out by the DOL guidelines in the body of the article. The six criteria set out in the DOL Fact Sheet #71 are:

1. The internship, even though it includes actual operation of the facilities of the employer, is similar to training which would be given in an educational environment;

2. The internship experience is for the benefit of the intern;

3. The intern does not displace regular employees, but works under close supervision of existing staff;

4. The employer that provides the training derives no immediate advantage from the activities of the intern; and on occasion its operations may actually be impeded;
5. The intern is not necessarily entitled to a job at the conclusion of the internship; and

6. The employer and the intern understand that the intern is not entitled to wages for the time spent in the internship.

According to the FLSA, a person only qualifies as an “intern” if all of the six criteria in Fact Sheet #71 are met (Bacon, 2011). The U.S. courts, however, are divided as to whether an employer must comply with all six of the criteria in Fact Sheet #71, if the “totality of the circumstances establish that the intern is not an employee” (Edwards & Hertel-Fernandez, 2010, p. 4). The FLSA defines an employee as “any individual employed by an employer.” Yet to “employ” means “to suffer or permit to work,” and the Supreme Court has stated that employee “cannot be interpreted so as to make a person whose work serves only his own interest, an employee of another person who gives him aid and instruction” (Bacon, 2011, p. 71). This implies that an intern, who is being given instruction in the workplace for their educational benefit, cannot be considered an employee. The term “volunteer” covers any individual who “volunteers to perform services for a public agency which is a State, a political subdivision of a State, or an interstate governmental agency” (Bacon, 2011). The FLSA has exemptions to the minimum wage requirements for “learners,” “apprentices,” “messengers,” and “certain full-time students.” Additionally the Wage and Hour Division of the Department of Labor has a subcategory of exempted workers called “student learners” (Curiale, 2010, p. 108). These basic details of the terminology in the law are important to describe, as the different legal definitions of “employee,” “intern,” “student learner” and “volunteer” are relevant to this problem of practice. If an intern can be defined as an “employee,” they are entitled to minimum wages under federal law.

The DOL laws refer only to for-profit organizations, so non-profit and government agencies do not need to comply when hiring unpaid interns. There is also “a special exemption
for Congressional interns from the definition of ‘employee’ included in the Congressional Accountability Act of 1995” (Edwards & Hertel-Fernandez, 2010, p. 3). When the courts have applied the DOL Fact Sheet #71 “test” to interns, the interpretations have varied. The U.S. courts of appeals are divided as to whether an employer must satisfy all six criteria to avoid an employment relationship with an intern, or may fail on one or more criteria if, according to the DOL Field Operations Handbook (1993), the “totality of the circumstances nevertheless establishes that the intern is not an employee” (as cited by Bacon, 2011, p. 74). For the layperson, either an academic internship adviser or an employer, the legal guidelines are a challenge to interpret, and certainly ambiguous, even for the more legally minded individuals. In addition, the landscape of the courts, labor, higher education, and the economy has changed significantly since 1947, when Walling vs. Portland Terminal Co. set the “groundwork for unpaid internships” (Bacon, 2011, p. 72).

There are signals that this reissuance of the DOL guidelines (DOL, 2010) may severely limit internship opportunities and make the possibility of gaining experience in the field even more competitive; a pre-cursor to the competitive job search, prior to graduating from college (Bacon, 2011). Another outgrowth of the increasing difficulty in securing an internship is the development of third party companies that lure students with the guarantee of a glamorous internship, or the skills to secure such an internship, in exchange for a hefty fee (Bennett, 2011). Dream Careers is one such company, where students are promised a fabulous summer internship, plus housing in prominent cites around the world, for a fee of close to $9,000 (http://www.summerinternships.com/). The Fullbridge Program offers short-term professional skill development programs to students in New York, Boston, Chicago, and San Francisco, without academic credit or housing included, and charges approximately $300 a day.
As internships have become a more critical component of the college experience, and simultaneously become more competitive to secure, these companies and others have jumped into this market to meet this growing demand.

**Educational Oversight**

The National Association of Colleges and Employers (NACE) put forth a position statement on unpaid internships in 2011. To establish uniformity in the use and application of the term “internship,” NACE recommends the following definition:

> An internship is a form of experiential learning that integrates knowledge and theory learned in the classroom with practical application and skills development in a professional setting. Internships give students the opportunity to gain valuable applied experience and make connections in professional fields they are considering for career paths; and give employers the opportunity to guide and evaluate talent. To effectively implement this definition, it is necessary to develop criteria that college career centers and employer recruiters can use to identify workplace experiences that can legitimately be identified as “internships.” (NACE, 2014)

The discussion of these two sets of criteria is framed by several conditions. These conditions are the legal definitions set by the Fair Labor Standards Act (FLSA); the widely varying guidelines set by individual educational institutions and academic departments within institutions; employer perspectives on and objectives for internships; and the unique experiential learning objectives of students. Given this context, NACE has established “Criteria for an Experience to Be Defined as an Internship.” To ensure that an experience—whether it is a traditional internship or one conducted remotely or virtually—is educational, and thus eligible to be considered a legitimate internship by the NACE definition, all the following criteria must be met:
1. The experience must be an extension of the classroom: a learning experience that provides for applying the knowledge gained in the classroom. It must not be simply to advance the operations of the employer or be the work that a regular employee would routinely perform.

2. The skills or knowledge learned must be transferable to other employment settings.

3. The experience has a defined beginning and end, and a job description with desired qualifications.

4. There are clearly defined learning objectives/goals related to the professional goals of the student’s academic coursework.

5. There is supervision by a professional with expertise and educational and/or professional background in the field of the experience.

6. There is routine feedback by the experienced supervisor.

7. There are resources, equipment, and facilities provided by the host employer that support learning objectives/goals.

If these criteria are followed, it is the opinion of NACE that the experience can be considered a legitimate internship. It is important to understand this context when examining the literature about the educational components of an internship experience.

The evidence suggests that a well-designed internship program, in which educators work closely with supervising organizations to ensure that internships are challenging and rewarding, yield the best results for all stakeholders (Cunningham, Dixon, Kent, Sagas, & Turner, 2010). Unpaid internships that are educationally structured, or carry academic credit and more likely to fall under criteria #1 of the DOL Fact Sheet #71, “similar to training which would be given in an educational environment,” (DOL, 2010) and are therefore appealing to employers in the for-
profit sector. The one criteria that has drawn the most criticism from academic advisers and employers alike is criteria #4, that “The employer that provides the training derives no immediate advantage from the activities of the intern,” (DOL, 2010) as this is counter-intuitive to the pedagogy of experiential learning (Kolb, 1984), and is misaligned with the 5-stage model of skills development (Dreyfus & Dreyfus, 1980), both of which guide the rationale for learning through academic internships. Aoun (2010) asserts that this limitation of doing no real work may be detrimental to the interns as “the way to learn is arguably through work” (as cited by Bacon, 2011, p. 87). While the DOL criteria allows job shadowing opportunities, the “internship is simply not as beneficial to an intern when he or she is prohibited from engaging in hands-on work related activities” (Braun, 2012, Para. 27)

While many employers believe they satisfy the requirement of an unpaid internship as “similar to training that would be given in an educational environment,” (DOL, 2010) if the intern is receiving college credit, there is no mention of academic credit in the DOL guidelines (Curiale, 2010). Many colleges award academic credit without a robust academic component to the fieldwork experience (Agle, et al., 2014). The requirement of academic credit further exacerbates socio-economic disparity, as less affluent students cannot manage the double bind of paying to work for free (Bacon, 2011). The language “similar to training which would be given in an educational environment,” is certainly an aspect of the law open to interpretation and wrought with ambiguity.

Yamada (2002) promotes the concept of direct educational institutional oversight of internship programs, by imposing a requirement on employers that the student will develop skills related to their educational outcomes, if academic credit is granted and the intern would therefore not be considered an employee, and not entitled to wages. This clearly puts the onus for
regulation and oversight on the academic institution. With the granting of academic credit for an unpaid internship, the DOL laws become more challenging to apply as the lines between the work the student is completing and the educational opportunity gained become a bit blurry (Edwards & Hertel-Fernandez, 2010). Colleges should be wary of offering academic credit without oversight. For example, a student may intern for a newspaper, but not engaged in any educationally valuable activities and possibly only running errands for the editor (Durrant, 2013). An observant, inquisitive intern could certainly make this a learning experience, but for many it would be strictly grunt work. Mangan (2014) asserted, “Companies have widely interpreted the language (of Fact Sheet #71) to mean that, as long as the interns are earning academic credit, it is legal not to pay the intern. The judge in the Fox case, however, said that’s not necessarily true” (Para. 13). Coll and Eames (2000) state that it’s important for academic staff to see themselves as “educators,” and understand theories of learning and learning processes (as cited by Zegwaard & Coll, 2011). In a well-developed internship program, students develop confidence, poise, adaptability, and the ability to work collaboratively, all of which is critical learning, yet not teachable in a classroom setting (Braun, 2012).

Universities collecting tuition for academic internships have responsibility for the educational component of the internships as well the protection of their students. Issues of university liability could be addressed through communication about the DOL Fact Sheet #71, Title VII of the Civil Rights Act of 1964 (Edwards & Hertel-Fernandez, 2010), and monitoring work progress at the site, informing students of prior reports of unsafe sites, and discontinuing partnerships with employers who have exploited or mistreated interns. It seems prudent for universities to have both preventative procedures in place as well as planned response procedures in the event of intern mistreatment (Svacina, 2012). Maintaining regular contact with an intern
while in a field placement through weekly seminars, or an online discussion board, should be required of all academic institutions charging tuition for academic internships. While this more active role and oversight of the intern’s reflection process require more time, it would allow faculty advisers more insight into the types of tasks performed at the internship. The colleges’ investment in appropriate monitoring procedures of employers would need support from the DOL to secure the necessary additional funding (Braun, 2012).

**New Strategic Solutions**

Some would argue that there are inherent barriers to change, as legislators, judges, attorneys, and journalists, among others, who are in a position to challenge the status quo of unpaid internships, may have found professional success from an unpaid internship and therefore are reluctant to recognize the severity of the issues (Curiale, 2010). Others would argue that colleges and universities charging tuition for academic internships and using internships as a marketing tool for recruitment are also invested in the status quo, including the prevalence of unpaid internships. Regardless of the barriers to change, many authors proposed solutions to the unpaid internship “problem.”

New guidelines could address the DOL criteria #2 (is the experience primarily for the benefit of the intern?) and DOL criteria #4 (does the employer directly benefit from the activities of the intern?). The Economic Policy Institute (IPPR, 2014) has introduced a concept for a new “test” of the value and “fairness” of an unpaid internship that would compare the cost per hour to the employer of an intern with the per-hour benefit to the employer from an intern. The cost to the employer is used here, as a proxy for the benefit to an intern of an internship, as the benefit derived by the intern would be a challenge to measure. If the analysis resulted in a greater cost than benefit to the employer, the intern would not be considered an employee. If the benefit to
the employer were greater, the intern would be considered an employee and entitled to wages, under the FLSA (Edwards & Hertel-Fernandez, 2010).

The most effective way to challenge the ambiguity of the present system is for Congress to amend current terms for workers in the DOL laws and add explicit rules for student workers, or student learners (Edwards & Hertel-Fernandez, 2010). The WHD has the authority “pursuant to section 14(a), to create a subcategory of ‘learners’ specifically relating to interns” (Curiale, 2010, p. 117). It could be inferred that Congress intended for the WHD to fill in the gaps in the FLSA Act, in circumstances such as the ambiguity of the unpaid intern, by creating more detailed, case-specific regulations (Curiale, 2010). Certainly, the Congress of the 1930s did not anticipate this specific “intern economy” (Perlin, 2011), or the provision of the learner exception to give protection to these workers, as is applicable to interns today (Curiale, 2011). As opposed to stepping up the enforcement of laws that are sixty years old, the government should develop criteria for unpaid internships that reflect the current economic climate, and isolate and squelch the “bad” internships without disrupting the “good” internships that deliver benefits to the learner populations that need them (Braun, 2012). Colleges and Universities should adopt an aggressive policy of requiring employers to post student workers rights, as well as worker protection information, in public places (Edwards & Hertel-Fernandez, 2010). The Bureau of Labor Statistics and census Bureau should include questions on their surveys to classify interns, as this would result in the ability to conduct research on the distribution of internships throughout the for-profit sector (Edwards & Hertel-Fernandez, 2010). The DOL laws should apply to non-profit and government agencies, as incidents of exploitation and discrimination can occur in all kinds of organizations (Edwards & Hertel-Fernandez, 2010).
Some others have proposed addressing the ambiguity of DOL Fact Sheet #71, possibly requiring that the guidelines apply to non-profits and government agencies, or implementing a different kind of balancing test (Bacon, 2011). Another alternative is placing the responsibility for regulation with educational institutions. Aoun (2010) asserted, “Colleges and universities must continue their active monitoring of experiential learning programs, and place students in secure and productive environments that further their education” (as cited by Bacon, 2011, p. 92). Given the wildly divergent models for how internship programing is handled from campus to campus, this may not be a realistic solution. Staying fully informed about changes to the law may be a better solution, “given the ambiguities in the law and the uncertainty about enforcement, taking the initiative to be as informed as possible can only prove to be beneficial to academic internship advisers, interns and employers” (Bacon, 2011, p. 95).

Summary

As the literature reveals, unpaid internships have become a vital component of the labor market, the return on investment of a college degree, a rite of passage, and a complex social justice issue that must be addressed. The U.S. DOL laws have not kept pace with the prevalence and importance of internships as integral to a college education and yet the federal government has a critical responsibility to ensure that workers of all kinds are not subject to discrimination, are compensated fairly for their contributions, that social injustice is not institutionalized through unpaid internships, and that employers do not have an incentive to replace full time workers with unpaid interns (Edwards & Hertel-Fernandez, 2010, Bacon, 2011, Curiale, 2010). Additionally, institutions of higher education are responsible for the experiences of their students. As institutions are responsible for providing a safe living environment and a dynamic learning environment, so too are they responsible for their students’ field based learning experiences,
particularly if they are collecting tuition for such opportunities. As this literature demonstrates, there is accountability, for all stakeholders in experiential education, in this case unpaid internships: employers, students, academic advisers, and the federal government. The quandary remains, however, as “regulation itself may deprive student interns considerable opportunities and diminish individual prospects for employment” (Gregory, 1998, p. 253). One would hope that this deprivation in the short term may result long term in employers offering compensation for internships and as FDR hoped in 1937, “a fair day’s pay for a fair day’s work” (as cited by Curiale, 2010, p. 101).
Chapter III: Research Design

Methodology

A qualitative approach was effective in answering the research questions posed for this study given that the data was collected “in a natural setting, sensitive to the people and places under study” (Creswell, 2013, p. 44). Taylor and Bogdan (1998) contend that qualitative findings “incorporate participants’ own words to describe a psychological event, experience, or phenomenon” (as cited by Ponterotto, 2005, p. 128). The qualitative approach is also appropriate as it “involves closer attention to the interpretive nature of the inquiry and situating the study within the political, social, and cultural context of the researchers, and the reflexivity or ‘presence’ of the researchers in the accounts they present” (Creswell, 2013, p. 45). The problem studied is a current debate within academia and industry today, as educational learning outcomes and the value from unpaid internships are undergoing intense scrutiny from multiple arenas (Schorr, 2014, Braun, 2012, Aoun, 2010). Discovering the learning factors and the context factors in the internship experiences discussed by the participants in this study identified work environments that are more or less conducive to learning and the emergence of self-efficacy (Bandura, 2002) in the interns. Work environments that are conducive to educational outcomes align with the DOL criteria for unpaid internships. One aspect of informal learning in the workplace (Eraut, 2004) involves one’s supervisor, as “people’s learning at work is greatly affected by the personality, the interpersonal skills and the learning orientation of their manager” (p. 271). Internship advisers can qualitatively assess this aspect of informal learning (Eraut, 2004) through their relationships with the employer and students’ reflective journals. The collective case study allowed for “an in-depth description and analysis of a bounded system” (Merriam, 2009, p. 40). The cases compared in this study included the internship advisers, and
the empirical data gathered encompassed second hand the experiences of the employers and the interns with regards to unpaid internships.

**Research Paradigm**

The research paradigm for this study is an interpretive framework, defined by Burrell and Morgan (1979) as “informed by a concern to understand the fundamental nature of the social world at the level of the subjective experience” (p. 28). This framework is based on pragmatism (Creswell, 2013) and relates to the research questions as Patton (1990) asserted, the questions seek answers to discover “what works—and solutions to problems” (as cited by Creswell, 2013, p. 28). There are many aspects of the pragmatic approach that resonate with the problem of practice, the research questions, and the methodology of a collective case study. Creswell (2013) affirms this connection as he states, “the individual using this worldview will use multiple methods of data collection to best answer the research questions, and will focus on the practical implications of the research” (p. 28). This study aimed to discover concrete solutions for practitioners in the field of experiential education to the problem of practice addressed here. Identifying the most effective processes and contexts (Eraut, 2004) for optimal learning outcomes from unpaid internships and the development of self-efficacy (Bandura, 1982) in an intern calls for an interpretive and pragmatic approach.

**Role of the Researcher**

The researcher’s role is as a key instrument in the process of data collection. A pragmatic approach utilizes multiple methods of data collection and the researcher must be cognizant of the participant voice in the development of the data collection tools. A high level of trust had to be established between the researcher and the participants in this study to tell an authentic set of stories. The interpretive approach maintains that meaning is derived from reflection and “this
reflection can be stimulated by the interactive researcher-participant dialogue” (Ponterotto, 2005, p. 129). The role of the researcher is then tied to the co-construction of meaning, along with study participants (Ponterotto, 2005). This researcher followed the argument presented by Briscoe (2005) to allow for inclusive research, allowing the inclusion of participants who share the researchers’ worldview, after a lengthy analysis of, among other things, how narrow the field of possible subjects would become if one insisted on an exclusive researcher model. The goal of the research is to contribute to practice, scholarship, and policy concerning unpaid academic internships, all of which are currently central to the college experience in many institutions of higher education.

Statement of Positionality

Briscoe (2005) effectively demonstrated how one’s positionality could change over time through internal and external forces: socio-economic, education, life experiences, traumatic and otherwise. She makes a persuasive argument that positionality is complex and fluid. The research questions posed for this study were shaped by my positionality within the context of unpaid internships and the role internship advisers play in shaping the future evolution of this quandary in higher education. My kinesthetic learning style creates a predisposition to a belief in the value of internships, as they epitomize “hands-on” learning. As the data was collected, sensitivity to defining certain practices as “wrong-headed” thinking had to be consciously utilized. In many colleges, the individuals assigned to the supervision of academic internships are faculty with other teaching responsibilities and interests; it may not be their “specialty,” as it is in my case.

My own passion from experiential learning started from an early age, but was solidified through an unpaid internship, after earning a college degree, which fundamentally launched my professional career. Since that time I have hired and supervised interns as an employer, guided
students throughout all stages of the internship “process,” and worked within academia to build effective internships programs, that serve all stakeholders. This passion for understanding more about why and how internships can be transformational and educationally effective has been further fanned by my own experiences in the field and subsequently, the research for this study. One example from my work in the field includes a college student, somewhat unclear about his professional focus, who was legally deaf until the age of three, who secured an internship as an event planner for a non-profit organization. In this role he was required to interact with vendors, staff, donors, over the phone, in person, and via e-mail. While his physical speech is slightly unusual, he emerged from this internship certain of his professional focus, and significantly more confident with written, verbal, and interpersonal communications skills. He had been transformed. My internalized beliefs which have influenced all phases of this study include, a) motivation towards professional achievement, b) inclination to believe that hard work will pay off, c) I’m entitled to challenges, responsibility and autonomy, and d) I have a pre-disposition to “learning by doing.”

While threats to validity–including researcher bias and reactivity to the participants–need to be addressed, one’s positionality cannot be entirely shut out of the study. Incorporation of one’s identity and experience into one’s research has gained support in the past few decades, with the caveat that the lens through which one sees and interprets data needs to be documented and made available, as part of the context or the fabric of the study. The researcher must be transparent about their positionality and the source(s) of their perspectives and biases, with a draft of an identity memo (Maxwell, 2013).

Also present in this study is the positionality of the various stakeholders. I remained aware of these various perspectives as I conducted the research and analyzed and interpreted the
results. The students’ positionality is affected by their education and their readiness to transition to their post-college careers; their skills, maturity, self-knowledge, work ethic, and their own positionality. The educational institutions’ good standing and reputation within the business community’s environment, which could be identified as the institution’s brand, considered here to be analogous with positionality, impacts institutional policies and protocols and the positioning of internship programming within the institution. The external site supervisors (employers), who take on interns, and their positionality, in relationship to their educational mentoring of the interns, was important to consider when evaluating the results of this research.

How would my positionality influence these research methods and findings? My beliefs and attitudes may not be present or recognizable in the participants. Every researcher needs to be conscious of not passing judgment on subjects who might not “share” these internalized perspectives and beliefs. One must be cautious of “back grounding” subjects if they seem to lack motivation, and other values that have been internalized. Back grounding is a concept coined by Hausendorf and Kesselheim (2002), indicating, “a researcher makes assumptions about study participants without verification of the data” (as cited by Briscoe, 2005, p. 30). Positionality of the researcher is an inevitable component of any study; it should be embraced, not omitted.

**Case Study Design**

The research questions posed necessitated an in-depth process of discovery, which included the perspectives of a group of stakeholders in the problem of practice presented in this study. An instrumental case study (Stake, 1995) more specifically a multisite, collective case study is an appropriate choice of methodology, as it allowed the researcher “to focus on an issue or concern and select multiple cases to illustrate the issue” (Creswell, 2013, p. 99). A collective case study allowed for cross-case theme analysis, not to strive for generalizability, but to add
breadth and credibility to the findings (Creswell, 2013). Thus, I aimed to employ maximum variation sampling strategies to represent diverse cases. The internship advisers, with diverse backgrounds and training, work in a variety of educational contexts with a variety of professional protocols, resources, and student populations. The cases to be compared are the internships, described by the internship advisers in their natural setting (Creswell, 2013). The bounded system (Merriam, 1998) is the internship adviser, the intern, the employer, and the U.S. DOL.

The case study methodology has several components, all of which have different origins. A case study is a kind of ethnography, so the theoretical underpinnings of the method share that history (Creswell, 2012b). The role of the researcher as a participant observer, typical in a case study (Creswell, 2013), grew from Anthropology and Sociology. Anfara and Mertz (2006) credit Bronislaw Malinowski (1984, 1987) as “the first Anthropologist to conduct fieldwork as a participant observer” (p. 15). A group of Sociologists, known as the Chicago school (Anfara & Mertz, 2006), adopted participant observation to study American culture. Existential sociologists assert that the “ability to engage in self-reflection is more important than seeking objective detachment” (Anfara and Mertz, 2006, p. 15). Cohen and Court (2003) assert, “there is a difference between ethnography and case study” (p. 287). Ethnography is inward looking, whereas a case study is outward looking with the goal of understanding a phenomenon. Cohen and Court (2003) contend, “The difference is not merely semantic” (p. 287).

Theoretical Frameworks

The inclusion of theoretical frameworks in qualitative research is fairly new and championed by seminal authors of case study methodology. Yin (1994) asserts that identifying theory at the outset of a study is important as it “affects the research questions, analysis, and findings” (as cited by Anfara & Mertz, 2006, p. xxii). Merriam (1998) refers to the theoretical
framework as “the structure, the scaffolding, and the frame of your study” (as cited by Anfara & Mertz, 2006, p. xxiii). The requirement in the case study method to collect data from several sources stems from the need to build “an in-depth picture of the case” (Creswell, 2012b, p. 162). In addition, a thorough collection of several data points lends credibility to the study and challenges the notion that qualitative research is not scientifically sound (Creswell, 2012b). In order to use case study methodology, one must have a clear case, which is bounded by time and place (Merriam, 1998), and therefore allows for a case analysis of the problem. The data should be collected from a variety of sources (Creswell, 2013), and a theoretical framework will guide the research process (Yin, 2009).

Several learning theories were explored as possible theoretical frameworks for this study. Experiential learning theory (Kolb 1984), transformational learning theory (Mezirow, 1997), the zone of proximal development (Vygotsky, 1978), and self-efficacy theory (Bandura, 1997) were considered yet informal learning theory (Eraut, 2004) integrated with the 5-stage model for skills acquisition (Dreyfus & Dreyfus, 1980) were chosen as these frameworks seemed most appropriate when considering all the variables that are involved in the ways students learn through an internship.

Informal learning theory (Eraut, 2004) examines learning that occurs in a much wider variety of settings than formal education. Although workplaces are not structured with learning as an organizational focus (Eraut, 2004), learning “on the job” is a known phenomenon (Dillon, McCaskey & Blazer, 2011) and has often been folded under the catchall phrase “learning from experience” (p. 46). There is an important distinction between experiential learning and experiential education (McRae, 2014). Experiential learning may occur without the guidance and structured reflection that is present with experiential education, as in an academic internship. The
perimeters of experiential education, which include facilitated guidance, reflection, demonstration of learning, and assessment of learning outcomes, align well with informal learning theory (Eraut, 2004). Eraut (2004) identified four main types of activities that support how learning happens: “participation in group activities, working alongside others, tackling challenges tasks, and working with clients” (p. 267). Discovering if these activities are present or not in an internship could contribute to an understanding of how interns are learning. Successful learning also depends on the quality of relationships in the workplace that varies with the person and the context (Eraut, Maillardet, Miller, Steadman, Ali, Blackman, & Furner, 2004). Other activities that Eraut (2004) identified as contributing to how one learns in the workplace are “problem solving, learning from mistakes, getting information and asking questions, developing relationships and accessing networks at the workplace, and giving and receiving feedback” (p. 267). These themes can be applied to the data on learning outcomes from internships to further inform us as to how interns may learn from the social context of an unpaid internship, while remaining within the guidelines of the law.

Eraut (2004) developed a visual depiction of the factors that affect learning in the workplace, which include both learning factors and context factors (p. 269). In short, the learning factors are those that an individual learns through challenging tasks, which are valued and supported through evaluative feedback, and result in confidence and commitment in the employee. The contextual factors are that the allocation of work, clearly defined as individual or collaborative—which allows for relationships and encounters with people at work—lead to clear expectations of performance and progress in one’s role, and leads to effective learning (see Fig. 1). One aspect of informal learning in the workplace (Eraut, 2004) involves one’s supervisor as “people’s learning at work is greatly affected by the personality, the interpersonal skills and the
Eraut (2004) asserts that “‘learning from experience’ has dominated both adult education and learning in the workplace without much critical attention” (p. 248). Eraut (2004) deconstructs the concept of informal learning from learning from experience as he finds that “the learning cycle of Kolb and Fry (1975) is confusing” (p. 251). Eraut (2004) further distances his theory from experiential learning theory (Kolb, 1984) as it “appears to privilege the meaning of ‘an observation as an idea’ over that of an ‘observation as a process of sensory reception’” (p. 251). Eraut (2004) further describes how learning from experience is “constructed more as personal not interpersonal learning” (p. 247) and learning in the workplace is social in nature.

![Diagram of factors affecting learning](image)

Figure 1: Factors affecting learning (Eraut, 2004, p. 269)

Eraut (2004) defines informal learning as being on one end of a spectrum of a continuum of formality, which includes “implicit, unintended, opportunistic, and unstructured learning, and the absence of a teacher” (p. 250). This aspect of the theory is at odds with the criteria set forth in the
DOL Fact Sheet #71, as the learning in an unpaid internship should be “similar to training which would be given in an educational environment” (DOL, 2010). This theory incorporates what is being learned, how it is being learned, and factors affecting learning in the workplace.

The original 5-stage model of learning (Dreyfus & Dreyfus, 1980) identifies a series of stages of skill development from novice, to competence, to proficiency, to expertise, to mastery (see figure 2). The frameworks of informal learning (Eraut, 2004) and the 5-stage model of learning (Dreyfus & Dreyfus, 1980) were interwoven to examine the problem of practice outlined here and address the research questions posed.

![Dreyfus and Dreyfus (1980)](image)

Figure 2: Dreyfus and Dreyfus (1980)

The integration of two theories of learning, Informal learning (Eraut, 2004) and the 5-stage model of learning (Dreyfus & Dreyfus, 1980) provided a coherent lens through which to view this problem of practice and effectively informed the qualitative methodology, data
collection, data analysis, and findings for this study. Learning factors refer to what is being learned and how it is being learned, context factors refer to the factors that affect the learning in the workplace (see Figure 3).

**Rationale For The Frameworks**

Discovering the specifics of what is being learned, how it is being learned, and what factors affect the learning in the workplace were useful for assigning more definable value to these internship experiences. Charting how an intern moves through the 5-stage model of skills acquisition (Dreyfus, 2004) supports the discovery of what discipline specific mastery is attained in the workplace. Eraut (2004) concluded that “the transfer of knowledge from education to workplace settings is much more complex than commonly perceived” (p. 256). In addition, Eraut, et al. (2004) assert that knowledge and learning are both individual and social. The individual perspective allows us to explore what and how people learn, and differences in their
interpretations (Eraut et al., 2004). A social perspective examines the social construction of knowledge and the array of cultural practices that are inherent in the context of learning (Eraut et al., 2004). These perspectives deepen the discovery of what is learned through an internship, how it is learned, and what factors affect the learning.

It is the educational value of work-integrated learning that is central to the debate about unpaid internships. If it is demonstrated that learning from an internship occurs similarly to an educational setting and the activities of the intern do not directly benefit the employer, an internship may be unpaid within the current law. Eraut (2004) developed a useful typography of what is learned, which he views as “a heuristic” (p. 265), that includes the “outcomes of task performance, awareness and understanding, personal development, teamwork, role performance, academic knowledge and skills, decision making and problem solving, and judgment” (Eraut, 2004, P. 265). This typography was useful when developing criteria to evaluate learning outcomes from internships. Eraut (2004) asserted, “this could also be used as a template for planning, prioritizing, recoding, or reviewing professional development” (p. 266). In regards to how learning takes place in the workplace, Eraut (2004) discovered that there were “four main types of work activity that regularly gave rise to learning; participation in group activities, working alongside others, tackling challenging tasks, and working with clients” (P. 267). The factors that affect learning in the workplace (see Figure 4), or internship site for the purpose of this study, were significantly impacted by an individual’s confidence, which ties directly back to self-efficacy (Bandura, 1982).
Case Selection

There are several stakeholders impacted by this problem of practice who could have been selected to construct this case study. Employers, academic advisers, interns, the DOL, parents, faculty and administrators in higher education, employees of secondary internship delivery businesses, employment lawyers, economists, social activists, and representatives from the media all have a stake in the debate about unpaid internships. The educational and professional growth
experience of the intern themselves is at the center of this debate. The intern must have a valuable educational experience in an unpaid internship to warrant investing time and often tuition dollars for an activity that is not compensated. Academic internships advisers are as invested in constructive, positive outcomes from an unpaid internship experience as any other stakeholder listed above, except perhaps the interns themselves. The internship is a system that is bounded by the intern, the employer, the academic adviser, and, noticeably since 2010, the DOL.

I chose to examine this case through the direct experiences and knowledge of the internship advisers, as access was most readily available and these individuals have the greatest breadth of experience, along with personal involvement in internships, amongst the other stakeholders. The choice to do a collective case study, with data collected from numerous sites, is reflective of the desire to have the findings be as generalizable as possible, given the limitations of this qualitative study.

**Participant Recruitment and Access**

Participants in this study are internship advisers who oversee unpaid internships in the for-profit, marketing communication sector. Participants are over the age of 18, and represent a range of ethnicities, ages, socio-economic levels, and genders. The participants are members of one or more of the following professional organizations, Cooperative Education and Internships Association (CEIA), World Association of Cooperative Education (WACE), or New England Association of Field Experience and Internships (NEACEFE), and are working with students completing unpaid, academic internships. Participants (internship advisers) were recruited through a call for participants by the researcher (Appendix C: Email recruitment Letter for Participants). The participants were identified as members of the professional organization listed above and contacted by e-mail. The participants come from a range of educational institutions:
small and large; private and public; and situated in urban, suburban, and rural areas. The common thread between the institutions is the commitment to experiential education evidenced in their mission statement and programming dedicated to internships, service learning, co-ops, study abroad, and work-based learning. All of the participants grant academic credit for experiential education that includes guidance, reflection, supervision, and assessment of learning outcomes to some degree. The participants that were chosen for interviews are individuals who have made a significant contribution to the field of experiential education and have direct, in-depth experience working with unpaid internships. Some of these participants have published scholarly articles; some have published internship guides; some have run workshops on best practices of running internship programs; they all contributed insightful observations to the problem of practice in this study.

Data Collection and Storage

The data for this study was collected as depicted by the “Data Collection Circle” in which “data collection is a series of interrelated activities aimed at gathering good information to answer emerging research questions” (Creswell, 2013, p. 146). (Figure 5)

![Data Collection Circle](Creswell, 2013)
As the researcher, I was the sole collector of the data for this study and incorporated strategies for validation (Creswell, 2013). Methods of data collection for this collective case study included a survey with open-ended questions and interviews with internship advisers. The data from the survey and the interviews contributed to answering the research questions; one of these data collection methods alone would have rendered the picture incomplete. Thus I conducted responsive interviews so I could “see the world from other perspectives” (Rubin & Rubin, 2012, p. 3). The interviews were approximately one hour in length. Interview questions were designed to identify what perspectives and processes the adviser incorporates into their work with unpaid interns and if these have changed in recent years. The interviews took place on site, in a private, quiet space where the adviser felt comfortable and was not distracted. The interviews were recorded using two lavaliere microphones and an electric recorder (Olympus UN-702 PC) and then transcribed by a professional transcription service. The interviews followed a specific protocol for internship advisers and were recorded in person (whenever possible) on two devices to ensure fault-free capture. The data recordings (MP3’s) and the final interview transcriptions were stored on an encrypted on-line storage drive that is password protected. The transcriber signed an agreement of confidentiality prior to starting the transcriptions (Appendix B: Transcriber Confidentiality Agreement). Any files that were exchanged via email were transferred to the encrypted on-line storage drive and the emails deleted. All data collected is accessible only to the researcher.

**Data Analysis**

This embedded analysis (Yin, 2009) followed the process outlined by Creswell (2013) of providing an initial “detailed description of each case and themes within the cases” (p. 101), a thematic analysis across the cases followed, and lastly, the interpretation and meaning of the
cases was put forth. This interpretive phase is what Lincoln and Guba (1985) assert, “constitutes the lessons learned from the case” (as cited by Creswell, 2013, p. 101). Discourse analysis was conducted on data collected through the survey and interviews (Miles & Huberman, 1994). I initially read through the entire transcriptions a few times to get a sense of the overall feeling of the materials. Each file was named. I coded by hand and utilized IN VIVO and descriptive coding (Saldana, 2013). The data from all sources was then sorted into themes. The themes were then developed into descriptions of what emerged from the data. Merriam (1998) contends that, “analysis and interpretation – our study’s findings – will reflect the constructs, concepts, language, models, and theories that structured the study in the first place” (as cited by Saldano, 2013, p. 8). Coding is not merely labeling, it’s linking the data to an idea (Saldano, 2013). The guidelines for an embedded analysis of a multisite, collective case study were followed (Creswell, 2013).

**Trustworthiness**

LeCompte and Goetz (1982) identified both internal and external threats to validity in qualitative research, which led to criticism in the scientific community as failing to “adhere to canons of reliability and validation” (as cited by Creswell 2103, p. 245). Since 1982, many authors have put forth perspectives and terms that attempt to address this criticism of qualitative research. In this study, trustworthiness was initially established through “prolonged engagement” in the field (Creswell, 2013) to ensure the researcher identified “misinformation that leads to distortions” (p. 251). At no stage of the data collection process, did I share personal perspectives or discuss my positionality or opinions with participants. Themes that emerged from the data were “referenced as interviews continued, to assess their validity and to shape the interviewer’s research questions” (Saldana, 2013, p. 180). Triangulation was used to corroborate the evidence
from different individuals, information sources, and methods of data collection (Creswell, 2012b). I incorporated member checking (Creswell, 2012b) by asking two of the participants to check the accuracy of the account and if “the interpretations are fair and representative,” (p. 259) and allowed two weeks for selected interview transcriptions to be reviewed by the participants, and cleared as accurate and representative of what was discussed in the interviews.

Throughout the study, I clarified researcher bias by being reflective about my role in the research, interpretation of the findings, and how my own positionality related to the findings (Creswell, 2012b). The potential threats to internal validity were minimized through careful planning, execution of protocols, participant selection, and a robust approach to informed consent. The potential threats to internal validity were researcher bias and familiarity with the topic (I have been in the field for 18 years), variations in academic programs (contexts will be different, possibly complicating some of the coding), and Department of Labor legislation could have changed over the course of this study. The type and amount of data collected during any case study—particularly a collective case study—requires particular diligence on the part of the researcher to avoid ethical issues associated with the injection of bias and “cherry picking” data to prove a particular point (Merriam, 2009). These issues were minimized through a thorough investigation of investigator positionality and by scrupulous maintenance of data integrity throughout the study period.

In addition, the research design, a multi-site, collective case study, allowed for a degree of anonymity as each internship adviser did not interact with any other internship adviser. As a sole investigator, I was the only person to see, hear, and interact with the participants during the data collection phase, and the only person privy to all the data. I was self-reflective and regularly conducted self assessments to ascertain bias. The size of the sample also contributes to
trustworthiness, as it is large enough to ensure the cases will represent a norm, yet small enough to contribute depth in the findings, and ensure that an authentic story had been discovered. It was completely clear that participants were not put at risk and they were well versed in informed consent. This study holds greater credibility as the participants were well informed about the research problem at the outset of the study (Rubin & Rubin, 2012).

**Summary**

Discovering what learning outcomes are achieved through an unpaid, academic internship is important to those in academia, industry, and experiential education as a whole. This study was an in-depth examination of the perspectives and practices of internship advisers and how these have shifted in response to the increased media attention (Schorr, 2014) on unpaid internships and the reissuance of the DOL laws (DOL, 2010) covering unpaid internships in the for-profit sector. Utilizing the framework of informal learning theory (Eraut, 2004) and the 5-stage model of skills acquisition (Dreyfus, 2004) one can evaluate if an unpaid internship falls within the guidelines of the DOL (DOL, 2010). If an intern effectively demonstrated mastery of discipline specific skills, as outlined by Dreyfus (1984), through their unpaid internships, it further justified the lack of compensation, according to the law. What these learning theories do not address is the socio-economic inequality that is perpetuated by unpaid internships (Edwards & Hertel-Fernandez, 2010). Unless all students have equal access to the learning opportunities and skills acquisition currently available through unpaid internships, this practice will continue to negatively impact the economy and further perpetuate a deepening class divide (Gregory, 1998).

Emerging from this application of these theoretical frameworks are the implications for practice, which are greater educational and governmental oversight prior to and at the conclusion
of an internship placement. Requiring a detailed description of the responsibilities and supervision available at an internship from an employer as well as a commitment to post the DOL Fact Sheet #71 and Title VII of the Civil Rights Act of 1964 in the workplace is crucial. Semi-regular contact or visitation at the internship work site by the academic internship adviser ensures that effective learning, evaluative feedback, and supervision are occurring. Assessment of learning outcomes from the internship allows for demonstrated evidence of compliance with the DOL criteria for unpaid internships. Stipends for students with demonstrated need, or federal-intern study funds, could be institutionalized to enable greater access across socio-economic lines to the educational and professional benefits derived from an unpaid internship.

Further research about the differences between experiential learning (Kolb, 1984) and experiential education is warranted as even practitioners in the field use these concepts interchangeably (McRae, 2014). Further clarification of the goals of experiential education would be welcomed, as a simplification has occurred in the past decade—that the only goal of an internship is full time employment. The richness and complexity of learning that may transpire through experiential education warrants further exploration (McRae, 2014).
Chapter IV: Report of Research Findings

Collective Case Study Description

The research tradition, which is most suited for this problem of practice, is a case study, specifically a collective case study (Creswell, 2013), in which data has been collected from a survey and in-depth interviews with a variety of participants. The bounded system (Merriam, 2009) of an academic internship includes the student, the employer, and the academic internship adviser. This study utilized primary data collected from academic internship advisers, and secondary data about employers and students, shared by the internship advisers. As the researcher, I have “purposefully selected multiple cases to show different perspectives of the issue” (Creswell, 2013, p. 99). The research design, theoretical frameworks, and choice of methodology align with each other as they are all based in a pragmatic perspective (Burrell & Morgan, 1979). This approach to the problem of practice while nuanced, strives for pragmatic solutions that will have relevance for scholarship, practice and policy. The goal of this study is to represent the perspectives of a variety of participants with different roles on a range of college campuses. The type and amount of data collected during any case study, and particularly a collective case study, requires particular diligence on the part of the researcher to avoid ethical issues associated with the injection of bias and “cherry picking” data to prove a particular point (Merriam, 2009). These issues have been minimized through a thorough investigation of investigator positionality and by scrupulous maintenance of data integrity throughout the study period.

Data Collection and Analysis

Data was collected using an on-line survey, created in Survey Gizmo (Appendix E: Survey Gizmo Survey) composed of 28 questions, which was sent to 60 participants, with the
goal of receiving 20 responses. In addition, in-depth, responsive interviews (Rubin & Rubin, 2012) were conducted with eight participants, five were conducted in-person, in the participant’s natural setting, and three were conducted via telephone. The survey was designed with some multiple-choice questions and several open-ended questions that encouraged comments. Both the quantitative and qualitative data from the survey was incorporated into these findings. The interview questions (Appendix F: Interview Questions for Internship Advisers) provided guidelines for the dialog that ensued during the interview, but not all the questions were asked of all participants. I incorporated several follow-up questions to probe for a deeper understanding of the perspectives of the participants. The interviews were all recorded, transcribed by a professional transcriptionist, and saved as word documents for in-depth analysis. The open-ended responses from the survey and the interview transcripts were coded by hand using IN VIVO and descriptive coding (Saldana, 2013). These coding methods yielded approximately 530 distinct codes that were synthesized into eight themes for use in the analysis of findings. The themes that emerged from the data analysis were; Structure of the Programs, Integration with Academic Learning Outcomes and Evaluation, Interface with Employers, Availability of Internships, Compensation and Value: Socioeconomic Imbalance, Alignment with the DOL Fact Sheet #71, Institutional Policies and Resources, and Outcomes. Each of these themes was recurrent and seen in the responses collected through the survey and the interviews. These themes aligned with the research questions, the literature, and the theoretical frameworks of informal learning (Eraut, 2004) and the 5-stage model of skills acquisition (Dreyfus & Dreyfus, 1980) and addressed the problem of practice studied here. The empirical data gathered has led to a greater understanding of the impact the DOL guidelines have had on internship advisers, how closely aligned the interns learning outcomes are with both the DOL guidelines, and the
employer’s internship descriptions of roles and responsibilities, and the ongoing availability of unpaid internships, as well as the consequences of this availability.

Profile of Participants

As established above, the structure, processes, and personnel involved with internship programming varies widely from institution to institution. The participant sample for this study represents that variety. The participants for the survey (Appendix E: Survey Gizmo Survey) were selected, as they are members of one or more of three professional organizations, Cooperative Education and Internships Association (CEIA), New England Association for Cooperative Education and Field Experience (NEACEFE), and the World Association of Cooperative Education (WACE). They are representative of large and small, public and private, urban, suburban and rural institutions of higher education. They all advise undergraduates, and in addition, as indicated on the survey, 59% advise both graduate and non-traditional students. The titles of the participants are captured in both the survey and the interviews, and represent both faculty and staff positions, and range from Coordinator to Assistant Dean and include key words such as experiential, career development, and internships (Appendix G: Survey Responses). All of the participants work or have worked directly in an advisory capacity with students completing unpaid internships in the for profit sector. The survey respondents indicated that the number of students who participated in internship advising ranged from 20 to over 450 a year, with the average being 74 students. Of these, the percent of unpaid internships ranged from 15% to 100%, with the average indicating that 64% of the academic internships are unpaid. The survey was administered, via Survey Gizmo (Appendix E: Survey Gizmo Survey), to 60 participants, and 17 participants responded, from October 19, 2014 to November 10, 2014, a
response rate of 28.4%. The findings from the survey (Appendix G) are incorporated into the findings from the interviews, and reflected in the themes that emerged.

The interview participants are profiled briefly here, including their title, their college and campus location and a description of the number and types of students they work with. Pseudonyms are used for all of the interview participants.

Alison Botts is an Assistant Professor/Internship Coordinator in the Media Arts Program at Endicott College on a suburban campus, in Beverly, MA. Endicott is a 4-year private college with 2,700 traditional residential undergraduate students and 2,700 adult learners and graduate students at satellite campuses across the state and the globe as part of the Van Loan School of Graduate and Professional Studies. Alison advises over 200 undergraduate students a year as they complete three mandatory internships from their sophomore to senior year in College. There are four full time and two part time individuals in similar roles to Alison at the college. In addition, there is a Director of Internships who serves in an employer relation’s capacity and three full time staff in Endicott’s Career Services Center.

Jay Cates is an Assistant Dean in Career Development in the School of Communications at Quinnipiac University; on a semi-suburban campus in West Haven, CT. Quinnipiac is a 4-year, private University that serves 6,500 undergraduates and 2,500 graduate students on three campuses. Jay advises approximately 800 students in the College of Communications. Of these students approximately 30 are enrolled in a 3-credit internship with him each semester. Jay has teaching responsibilities as part of his role, but he is in a senior level staff position in the Office of Professional Development. There are counterparts in each of the other schools at Quinnipiac.
Mark Train is a Senior Associate for talent development and marketing in the Career and Professional Development Center at Messiah College’s semi rural campus in Mechanicsburg, PA, and also on the college’s campus in downtown Harrisburg, PA. Messiah College is a 4-year, private, Christian college of the liberal and applied arts and sciences serving 2,789 undergraduate students and 445 graduate students. Mark advises approximately 200 students a year. Mark’s responsibilities have shifted within the past year, and his time to devote to internship programming has been reduced significantly. There is one other full time person in this role and one staff assistant who contributes approximately 10 hours per week to the internship programming.

Mary Duane is the Vice President of Experiential Education and Career Services at Johnson & Wales University on an urban campus in Providence, RI. Johnson & Wales is a private, 4-year college serving 17,000 undergraduate and 4,000 graduate students on four campuses. Mary also oversees programming and services at the Johnson & Wales urban campuses in Denver, CO, Charlotte, NC, and North Miami, FL, and oversees the four regional directors on those campuses. The regional director in Providence manages a staff of 30 experiential education coordinators who advise 2,000 undergraduates from the Providence campus. Thirty other experiential education coordinators supervise an additional 2,000 internships across the other three campuses. This model is unique as the interns also have an academic adviser in their discipline that oversees the academic component of the internship. This is considered a very high touch approach.

Alex Potter in a Senior Lecturer in Communications and Director of Internships at Simmons College on an urban campus in Boston, MA. Simmons College is a 4-year, private college
serving approximately 1,500, all-women undergraduates and 4,500 co-educational graduate students. Alex advises approximately 45 undergraduate Communications students a year in their required internship junior or senior year. There are faculty members in four other academic departments at Simmons with similar responsibilities. There are four full time career counselors in the Career Education Center who offer guidance with career preparation and serve as an additional resource for Alex and his students.

Betsy Sage is the Associate Director, Internship & Co-op Programs in the Center for Career Development at the suburban campus of the University of Connecticut in Storrs, CT. The University of Connecticut is a public, 4-year institution that serves 18,000 undergraduate and 7,000 graduate students. Betsy teaches two internship courses per semester. In addition, there are 60 internship courses offered across all disciplines at UConn, taught by department faculty. Betsy serves in a collaborative advising role with these faculty members.

Alan Cable is the Director of Graduate Management Programs and was the Director of Internships for Nazareth College on an urban campus in Rochester, N.Y. Nazareth is a private, Catholic, 4-year college that serves 2,000 undergraduate students and 1,000 graduate students. Alan worked with over 200 students a year in internships locally, nationally, and internationally. The program is centrally coordinated across disciplines and has a faculty adviser within each department.

Tina Brown is a lecturer and internships coordinator in the Communications, Culture and Information Technology Institute at the urban campus of the University of Toronto, in Mississauga, Ontario in Canada. The University of Toronto in a public University, that serves over 67,000 undergraduate and 15,000 graduate students. Of this total population, 19% of the
undergraduates and 4% of the graduate students are enrolled at the Mississauga campus. There is a large percent of international students at the University, 15% of the undergraduate population and 14% of the graduate population. Tina advises approximately 100 students a year. While Tina’s experience with Marketing Communications internships is not directly impacted by the U.S. DOL regulations, as she works at a Canadian University, her work with unpaid internships is impacted by the Canadian Department of Ministry, which has become much more actively involved with regulation of unpaid internships as a result of the media coverage in the U.S. about the DOL criteria for unpaid internships. Her expertise in the field of Communications and her long-term leadership role in CEIA and WACE made her insights valuable to this research and these findings.

The variety of perspectives that are represented by this diverse group of participants lends validity to the findings of this study. While the sample is relatively small and therefore the findings are not generalizable, it is likely that many stakeholders will find relevance in these findings to their particular campus and their specific challenges. The findings represent variations in student population size, campus type, geographic location, type of student populations served, and the role the participant plays and the title they hold in regard to internship programming.

Almost all the participants noted that students were under more financial pressure since the economic crash in 2008, and were more responsible for personally supporting their education. While record numbers of high school graduates are attending college, the cost of college continues to rise, and family incomes are not keeping pace with this increase. Most families are not able to contribute significantly to the cost of their children’s education. Since
1982, the cost of tuition has been increasing at triple the rate of inflation (Odland, 2012). As a result, the affordability and the value of a college education are being called into question (Wildavsky, Kelly, & Carey, 2011). There is significant data, however, which indicates that despite the increasing costs of tuition, a college degree has never been more valuable. In the U.S., a child from a family living in the bottom quartile of wage earners, who earns a college degree, has an 84% probability of rising above the bottom quartile, whereas a child from the bottom quartile, who does not earn a college degree, has only a 5% probability of rising above the bottom quartile (Markovich, 2012). Later in life, graduates enjoy substantially higher earning potential, but most graduating college students initially struggle to obtain an economic foothold. This scenario has added significant pressure for colleges to deliver a greater return on investment (ROI), as the stakes have become so high. Effective internship programming has become one way that colleges and universities have attempted to deliver a ROI.

The term internship programming refers here to the interaction and communication with employers, development and execution of curriculum, advising of student interns, assessment of learning outcomes, and evaluation of program goals in relationship to the political, economic and social context in which the program exists. Internship programming has come to include having a set of processes and procedures in place that reflect an understanding of the DOL criteria that regulate unpaid internships in the for profit sector.

**Structure of Internship Programs**

The structure of internship programming and the oversight of participation in academic internships vary widely from college to college. Some programs are housed in a career services office; others are overseen by department faculty, and are quite de-centralized. A number of the
participants referred to a change in the structure of internship programming towards greater centralization, where there is a college-wide internship office, but there are partners in every department and the faculty in every department who represent that departments’ interns and ownership is shared between the internship office and the academic departments. One internship adviser noted, “It’s a centrally coordinated model because the message is that internships are a partnership between the college and the departments and our role in central office is to create policies, procedures and systems that are equitable across campus” (A. Cable, personal communication, Nov. 20, 2014). The area in which internship programming is housed has implications in regards to its integration with academic learning outcomes and curriculum. This stems from the educational philosophy of the institution and the value placed on experiential education. Across the globe, the value in academia of experiential education, service and global awareness has risen in importance and become a more central message in many academic institutions’ mission statements. This shift has meant that more internship advisers hold faculty rank, or the reporting structure for the internship initiative is on the academic affairs “side of the house.” This is the case at Messiah College, where internship advisers have faculty status, though they are not tenured faculty, they do provide all of the services of an academic office. This approach is also in place at the University of Toronto, Mississauga, where the internship adviser described, “Our internship is a course; it’s an academic credit course. So it’s not long-term, nor full-time, and it is unpaid. Students go and work one day a week at their internship placement and that is integrated with all their other coursework” (T. Brown, personal communication, Nov. 20, 2014).

There are common assumptions of administrators, faculty, and advisers about “best practices” and learning outcomes for internships, but it has appeared at first glance that oversight
is left to happenstance and the learning outcomes from internship experiences are not assessed effectively or reported on, nor are they always communicated to employers (Bull, 2014). This study has discovered this happenstance is not typical on the campuses studied here. At Messiah College, “we make sure that the employers understand what our expectations are of them, and those expectations primarily are a clear position description, regular feedback, and a willingness to evaluate the student at the mid-semester point and at the end of the semester” (M. Train, personal communication, Nov. 10, 2014).

Through the lens of informal learning (Eraut, 2004), this study looked at how internship programs were structured, including systems for establishing learning outcomes, communicating with employers, and articulating the underlying pedagogy guiding the reflective activities through field-work classroom discussions and written reflections. If the internship is credit bearing, as was indicated by 94.1% of survey responses, this lends academic weight and credibility to the experience. The academic components typically associated with earning academic credit, as indicated by 88.2% of survey responses, include some or all of the following components: a learning contract, a face-to-face or virtual class with faculty facilitated peer discussion, written reflections or journals, a learning portfolio, and an oral presentation. Of the survey participants, 48% reported that internships were a graduation requirement, and 76.5% of these internships were graded. The components that went into the grading were typically a combination of the employer’s evaluation, classroom participation, and faculty evaluation of reflections and an oral presentation. Typically the college faculty will award a final letter grade, based in part on the site supervisor’s assessment of the student’s work and the employer’s evaluation. Survey responses indicated that the grade was based on the evaluation forms provided as part of the internship documentation, and as written on one survey response, “the
reporting and final report and portfolio and the faculty sponsor’s assessment of the student’s work, professionalism and learning.” Not all internship advisers believe that the employer’s evaluation should be part of the student’s assessment.

The structure of internship programming includes the employer’s program as well. In any job, one’s supervisor plays an important part of the overall experience of that job. Such is the case with unpaid internships, and one of the first rules for a successful internship is there has to be somebody on site who’s going to be a supervisor who is a specialist in the student’s field who can provide effective guidance and evaluative feedback that is specific to that discipline. One guideline an adviser communicated is that “there needs to be someone who’s interested in supervision and that’s usually the person who has the credentials, who’s interested in an active mentoring situation” (A. Botts, personal communication, Oct. 31, 2014). There are some activities which are particularly beneficial to the learning outcomes of the interns, such as the opportunity for students to be involved in meetings, and working with clients, and “sitting in on regular meetings, working with a client to see how a professional reacts when a client says I hate this, and the intern learns what to do and how to handle that” (A. Botts, personal communication, Oct. 31, 2014).

The structure of the internship programming at all these colleges and universities appeared tied to the individuals in charge at this time. Some advisers had developed the systems they were using, others had inherited them, but most processes had not been institutionally initiated. It became clear through the process of this research that the role of the specific adviser was critical to the way the programs were structured. Summed up in this way by one adviser, “You know how it is in higher education, things change, people leave, I don’t want to say it’s a revolving door but these programs are changing hands and if someone’s in place that might not
be as proactive or takes more of a reactive approach in running a program like this I can see where the outcomes are not clearly as rich anymore” (J. Cates, personal communication, Nov. 14, 2014).

Internship advisers clearly pay attention to DOL regulations and assessment and have embraced these and encouraged the companies and the students to understand what’s going on with DOL regulations.

I teach my media career development class and the nuts and bolts of internships toward the end of the semester and I talk to them about the experience: what it is like, how they should ask the right questions, what they should be doing in an internship. I tell my students, don’t just sit there and be nervous about it. This is your experience, you’re paying for it, go get it. If you’re not comfortable, come back to me and we’ll pull you out of the internship if we have to, and I’ve done that before, we’ve pulled people right out for a variety of reasons as we have to make sure we’re protecting these kids. (J. Cates, personal communication, Nov. 14, 2014)

Integration with Academic Learning Outcomes and Evaluation

As one model of experiential education, the core mission of an internship is to learn. Learning within the context of an internship is very different than traditional classroom learning. This is one of the issues with the DOL Fact Sheet criteria #1, which states that the internship must be “similar to training which would be given in an educational environment” (DOL, 2010). The components of a professor, a syllabus, with texts, written assignments, tests, lectures, and classroom discussions are replaced with an internship supervisor, who may become a mentor, co-workers, a workplace (possibly virtual), assigned tasks, and hopefully guided reflection in an academic setting. The way in which learning is achieved through an internship is less structured,
more serendipitous, informal and situational. A student has less control over when and how they learn through an internship. While taking initiative and asking thoughtful questions is important in a traditional class, these behaviors and actions are absolutely vital to learning through an internship. As students develop these skills through field-based learning, they come back to a traditional classroom setting as more engaged learners with a greater appreciation for the relevance of the material being covered (Kessler, Danko, & Grant, 2009). The integration of discipline specific learning is more successful if the internship is completed after the students have completed their freshman year. One adviser noted “We want them to have a certain number of courses under their belt within their majors. We want the student that knows what they want to do, how they should act, and possesses a certain level of maturity,” (J. Cates, personal communication, Nov. 17, 2014).

This study discovered how internship advisers guided their student’s learning experience by considering the factors of what is being learned, how it is being learned, and the factors affecting the learning in the workplace (Eraut, 2004). The key for compliance with the DOL guidelines is to provide a learning opportunity through the internship, so a primary charge for internship advisers is to ensure that their students are having an educational experience while completing an unpaid internship. Of the survey participants, 76.5% reported that learning objectives were communicated to the employers, before the term they are hosting students, via email, phone conversation, and the website. One such communication is described as, “We also provide an employer guide for hosting interns. This is done on initial contact with the employer if they want to post a job opportunity to our job board. It's also communicated to the employer during the job review process when students submit their own opportunities for an internship,” a survey respondent commented.
The lens of informal learning (Eraut, 2004) was used to interpret specifically what a student was learning in an internship by assessing learning outcomes from an internship and how they were learning by evaluating the students’ written reflections and classroom participation and determining what factors were affecting the student’s learning through an evaluation of the workplace through a site visit. This process necessitates the establishment of learning outcomes from the internship as well as assurance that the structure of the internship complies with the guidelines of the law. The implications of this task are that the internship adviser should communicate the established learning outcomes to the employer and then as assessment is completed, by the employer, or the adviser, determine whether these learning objectives have been met and the learning outcomes achieved. The responsibility for establishing learning goals and outcomes is shared between academic adviser, employer and intern. The supervisor is key in effectively evaluating that set of goals, and if these goals are realistic, and how manageable the learning agreement actually is. Oftentimes, the student creates the goal but then they have to explain how they’re going to achieve that goal, the students needs to define “what do I need to do to achieve that goal, who do I need to help me to achieve that goal, how am I going to know when I’ve achieved that goal” (A. Botts, personal communication, Oct. 31, 2014).

While some students resist doing the academic components required of an academic internship, they tend to see the value of such engagement by the conclusion of the experience. Many students have expressed in the exit interviews that they appreciate the structured activities, and one adviser described a students view this way, “I’m glad you really pushed me on those journals and the paper because otherwise I wouldn’t have experienced the internship the way I wanted to. I try to find a way to squeeze as much out of the experience as I can” (J. Cates, personal communication, Nov. 14, 2014). Structuring the reflection component of an academic
internship program is resource intensive and is founded on the belief in the value of reflection as a vital component of experiential education programs. This perspective is not held uniformly among academics, and therefore is sometimes undervalued and the internship programming is subsequently under-resourced.

Consistency across all departments is often elusive, and there is some concern about inconsistency across the campuses, as there is not a baseline of what is minimally involved with internships for credit. Some practitioners do not hold regular class meetings, conduct site visits, or require regular written reflections; others require all of these. While there is often a consistent set of expectations for a freshmen writing class, this is not the case for internship field work classes. One practitioner interviewed was strongly in favor of systematic reflection of some kind, “I don't think they need necessarily weekly assignments but I there needs to be a base point where students have to check in and report on learning consistently, and not just at the end of the year when they do an evaluation” (B. Sage, personal communication, Nov. 21, 2014).

One of the key goals of any internship is for a student to gain greater proficiency with a variety of skills sets. In this research, the lens of the 5-stage model of skills acquisition (Dreyfus & Dreyfus, 1980) was used to discover if the processes and protocols utilized by internship advisers to establish learning objectives, communicate those to employers, incorporate those into a classroom experience, and evaluate if outcomes had been attained, were, in fact, enabling students to progress from novice to advanced beginner to competent to proficient, and even possibly expert, with the sought after skill set. Starting with clear expectations of responsibilities, skills sets, and terms of engagement is helpful when measuring skills acquisition. Acquisition of skills can be measured through effective assessment tools that measure desirable learning outcomes. The creation of learning activities in the program that ties directly back to the
academic curriculum with the inclusion of a self-evaluation that is done at the end of the internship is effective. An evaluation of transferrable academic skills that are tied to a core curriculum with defined learning outcomes, which every school has for that core curriculum, is advisable. Creating alignment between the expectations of students, employers and academic departments is the goal of such an initiative. One internship adviser spoke of this alignment,

We took those learning outcomes from the core curriculum and we created a self-evaluation form in which we asked the students to do a critical incident report on how they’ve used each of these learning outcomes in their internships, and we share that information with the faculty. That’s gone a long way in establishing the academic value of an internship and kind of bridging that gap. (A. Cable, personal communication, Nov. 20, 2014)

Several interview participants discussed the requirement of an internship job description, and 82.4% of the survey participants indicated these were provided. One survey response indicated, “Our college requires a written job description from the employer before the internship committee will approve a proposed internship. This is required in order for an employer to post a job opportunity.” What was revealed as less definitive was the inclusion of the college’s learning objectives into the internship job description. Of the survey responses, 37.5% indicated the learning objectives were incorporated, 12.5% indicated they were not, and 50% indicated that they sometimes were incorporated. This is understandable, as most likely employers do not think they are in the business of education, and should not necessarily be beholden to the academic learning goals for the students. This approach seems acceptable to one internship adviser who commented in the survey, “Every employer is different. We don't require that learning objectives be clearly indicated in the job description. Our job descriptions requirements are that they
adequately and accurately describe the responsibilities the student will be performing through the role.” Another internship adviser surveyed, felt, “We need to get better at requiring this. The students are required to create learning objectives as they complete an internship application. The employer, student, school dean and academic adviser all sign this application form.”

Performance evaluations of the interns from the employer seemed to be almost uniformly required across the campuses. Of the survey responses, 94.1% indicated that employers submitted a written performance evaluation. One adviser shared this system, “There are 2 evaluations each work term. There is a mid-term evaluation, which is either in person or over the phone with a person who holds a position similar to mine. The final evaluation is a written evaluation that the employer completes online.” There is less uniformity when it comes to academic learning objectives being incorporated into the performance evaluation. Of the survey responses, 47.1% indicate they are incorporated, 41.2% indicate they are not, and 11.9% indicate that the objectives are sometimes incorporated into performance evaluations. These responses indicate that there should be more resources put toward communicating the learning goals to the employers, and that students may make a greater connection between their academic program and their internship experiences if the outcomes were more closely aligned (Stasz & Brewer, 1998).

**Interface with Employers**

Communication seemed to be key for an effective interface with employers offering unpaid internships. Each adviser had their own unique system for communication with employers, some are more explicit about the DOL criteria for unpaid internships, but all provide specific guidance on establishing learning outcomes and evaluation of the student’s performance. At Quinnipiac, an email letter goes to the employer and indicates that a student is enrolled in a
internship for credit at Quinnipiac University for an internship at that organization, and that letter specifies what the student’s expected to do, the hour requirements, the written requirements, and the fact that the supervisor evaluation needs to be completed at the conclusion of the internship. This was the system of communication described, “An email is sent with the letter attached and the evaluation attached. I interact with the employers periodically throughout the semester here and there and then at the conclusion of the internship I get the evaluation” (J. Cates, personal communication, Nov. 17, 2014). Offering the employer clear guidelines to follow, a clear set of expectations as to what their responsibilities are, and an informed position as to where the college or university stands on the value of unpaid internships, and how to ensure adherence to the DOL law, is good practice. There is greater latitude for internship advisers to communicate with students and employers directly,

When the first lawsuit started and the Ross Perlin book came out, I started doing more of my own research and becoming familiar with the regulations for unpaid internships. It is now included much more prominently in my employer guide, and our presentation to students to ensure they’re aware that these laws and rules and guidelines exist so no one is being exploited. I’ll use slightly harsher language with employers than I used to. If the employer isn’t demonstrating student’s learning, I absolutely push back whereas in the past, if it was paid maybe I wouldn’t give it as much second thought and now it doesn’t matter to me if it’s paid, it matters to me if the student is learning. (B. Sage, personal communication, Nov. 21, 2014)

The internship advisers are flagging internships that do not meet the DOL criteria more often, by evaluating the description of responsibilities, or determining through a conversation that there is not someone on sight to offer discipline specific supervision, guidance and
evaluative feedback. As the connection between a ROI from a college education and a robust internship program has been made, internship advisers have been compelled to ensure that unpaid internships are delivering the marketable skills and professional growth that was promised. In addition, the scrutiny of unpaid internships by the media has led internship advisers to be more vigilant about structuring internship programming to ensure the educational value is present in each internship opportunity. One internship adviser asserted that if an employer wants a social media intern to handle 100% of the company’s social media platforms, without in-house expertise, that would not be considered an internship. He said to the employer, “if you’re willing to pay this student, we can call it a freelance opportunity, and they couldn’t pay for the position so I said I can’t give you an intern because that’s illegal” (J. Cates, personal communication, Nov. 17, 2014). Another adviser communicated in a blog,

    Universities have the obligation to provide resources, including a working definition, to educate the employer, and to ensure that they approve and post opportunities that do not exploit the student. Yes, I used the term exploit; many employers do not like that term, yet it is at times the correct word when employers expect students to work excessively long hours, travel, and be productive without appropriate recognition. Educators have to review internship program descriptions and ask if the offered internship is in fact providing an experience that is equivalent to classroom learning, even if the student has not asked for credit. Career offices will need to make hard decisions about who may recruit on their campuses. (Settje, B., 2014)

While this comment is clearly a call for some changes in how internships advisers work with employers, the majority of internship advisers have not adopted significant changes in their practices and protocols. The survey responses indicated that 52.9% of internship advisers had not
changed their processes for guidance on unpaid internships significantly. Yet one advisor commented in the survey, “we are better about educating our employers about their responsibilities in an unpaid internship. These measures include creating an employer expectation list that the employers must acknowledge when posting an internship and during the credit application process.”

There were many different perspectives on whether the employer’s evaluation should be incorporated into the student’s academic assessment, and what percent of the grade this should represent. Internship supervisors are not educators, yet they are in a position to guide, mentor, and evaluate a student’s performance. One reason to not include the employers’ evaluation in the grade was accessibility: “It’s very difficult for me to even get the employer on the phone to talk about getting the evaluation. Most of the employers do not know how to evaluate performance. Ideally the actual supervisor who’s doing the evaluation has had a lot of hands-on experience with the student” (T. Brown, personal communication, Nov. 20, 2014). At a few of the colleges, the internship is graded as pass/fail, and the employer evaluation contributes to this, “because philosophically we’ve never been able to figure out an appropriate way to assign a letter grade that’s equitable across all students and across all internships. We grade them pass-fail and the employer performance evaluation was one aspect of the passing grade” (A. Cable, personal communication, Nov. 20, 2014). Assessment of learning outcomes and how that is incorporated into student’s academic evaluation is discussed more fully in Chapter Five.

**Availability of Internships**

The data collected for this study indicates there is a range of opinions about the ongoing availability of unpaid internships and is helpful when answering research question #3, “Have the DOL guidelines for unpaid internships impacted the availability of internships opportunities, and
if so, what are the likely consequences?” One might imagine that with increased pressure from the DOL to follow clear-cut guidelines that are challenging to decipher and more challenging to implement, unpaid internships in the for-profit sector would be drying up. Outside of Harrisburg, PA, this does not seem to be the case, as the career services office has an overflow of employers for their career fair and the market for interns as well as entry-level positions is growing. Mark Train was enthusiastic about this trend,

More businesses, I think because of the high profile lawsuits, are more conscious of compensating students. Honestly, we are in the Golden age of internships. It's just a commonly accepted professional development practice, and it's really a requirement for an entry-level job. Actually, internships are the key, the passport, whatever term or analogy you want to use, to an entry-level job. (M. Train, personal communication, Nov. 10, 2014)

Several advisers provided examples of a company’s shifting from offering unpaid to paid internships, and the ensuing drawbacks. For example, a network-television news organization may start paying interns, but instead of taking 15 interns as they once did, they take five. One adviser noted, “You’re going from having 15 open opportunities to five, and so it’s more competitive. Maybe they’re getting a better student, maybe that’s good, but it also means I’m losing opportunities for my students” (J. Cates, personal communication, Nov. 17, 2014).

It appears that the availability of internships is not the issue, but the availability of what advisers consider “good” internships. Alex Potter expressed this perception that there is a movement towards fewer, yet richer, experiences,

I think being forced to compensate will reduce the number of internships but what you have left are more valuable, useful internships that you’re paying someone to do the job
and therefore you’re spending a little bit more time and expecting more out of a student. It becomes a more professional relationship versus the student’s thinking, ‘I’m showing up and I’m not sure what I’m supposed to be doing.’ So I think it will be good in the long run. My belief is that all internships should be paid. If you’re doing real work for an organization, no matter what the organization, it should be compensated. (A. Potter, personal communication, Nov. 14, 2014)

Internship advisers need to be diligent and put in the time to evaluate the opportunities and establish trusted relationships with employers, in order to guarantee students a quality, educational internship, that meets the criteria of the DOL Fact Sheet #71 for unpaid internships, or is a paid opportunity. At Johnson & Wales, because of the availability of a stipend, the decision to take a certain internship is not focused on the compensation,

For us it’s not whether it’s for profit or nonprofit. It’s about the quality of that learning experience and making sure that whatever we require of that employer, if they’re meeting those standards, and we feel that it’s a good learning experience for our students. It doesn’t matter to us whether it’s for profit, nonprofit, paid or unpaid. We would prefer our students do a paid internship, but if it is an unpaid internship, we actually provide a stipend for our students. (M. Duane, personal communication, Nov. 11, 2014)

A majority of survey responses, 58.8%, indicated that they did perceive there were fewer unpaid internships in the past five years, but this was not necessarily a bad thing. Both students and internship advisers have become more focused on quality internship experiences and more knowledgeable about what elements contribute to a quality experience. As Alex Potter noted,

I think because more organizations are paying, they are taking fewer interns, but I think this is a good thing. It is allowing for a better, safer experience for all parties involved. If
your school is sending quality students into the field, the opportunities will remain consistent. (A. Potter, personal communication, Nov. 14, 2014)

An underlying issue of availability related to economics is the poor job market. While the economy is showing signs of improvement, companies are reluctant to expand their workforce to pre-2008 levels. More college graduates are willing to take unpaid internships to build their resumes, in order to compete for fewer entry-level professional jobs, and they are often beating out the students still in college for the higher quality opportunities. This view was shared by one adviser, “Students who have graduated and can't find jobs and accept internships have contributed to the current situation, where opportunities have become more limited” commented one survey participant.

A challenge to the status quo of glamorous internships was also expressed. This challenge was articulated here, “If the all the big media companies tomorrow decided they weren’t going to do internships, who cares? They’re using these kids for free labor…not paying anything and making a fortune off them. We don’t need it” (A. Potter, personal communication, Nov. 14, 2014). The DOL guidelines have posed challenges for industry, college students, and academic advisers, as a high percentage of internships in the marketing communications sector have routinely been unpaid (Alpert, Heaney, & Kuhn, 2009). In fact, many internship advisers would rather have students working in smaller organizations and getting more out of it and doing interesting work, than working at big name media organizations. Another adviser concurred on the survey that there were more opportunities with smaller companies: “I think there are more marketing communications position due to the proliferation of small companies and their need for social media marketing.” Some predict that there will be a fall and a rise of available internships as a result of current legislation—that they will continue to shrink for another 1 to 3
years, and then they will start growing again. “Conde Nast just settled their lawsuit. When the lawsuit happened, they completely canceled their internship program. Now that they’ve settled, I see in the next 2 years Conde Nast coming back out with an internship program. Maybe they hired a hundred, now maybe they’ll only hire 25. But the quality of the internship will be significantly better even if there are fewer opportunities” (B. Sage, personal communication, Nov. 21, 2014). The overall consensus was that there potentially will be fewer overall opportunities, but the quality of the opportunities will continue to rise as more employers don’t want to get sued, students are learning what’s involved with a quality internship, and they’re not willing to accept the status quo of what is sometimes referred to as “intern mills.”

**Compensation and Value: Socioeconomic Imbalance**

There appears to be a wave of clarification about value and how we define value in all internships, and it is not all tied to compensation in the form of wages. Almost all of the participants in the survey and the interviews expressed a desire for ALL internships to be paid, but acknowledged that was unrealistic. Clarification of value has added extra work for both the employer and the internship adviser, but this layer will enable students to be able to continue to participate in valuable internship experiences that are, in fact, creating professional opportunities for them. Some internship advisers are trying to stand up and say not all unpaid internships are bad things; there are some wonderful internship experiences available. The media has been voicing a one-sided, somewhat superficial perspective on the phenomena of unpaid internships. The issues with unpaid internships are more complex than what has been portrayed in the media. One adviser with over 20 years of experience in the field offered this perspective,

> The challenge is to offer a different voice out there, to say you’re pushing for paid, paid, paid, and paid. But even paid internships can be rotten [laugh]. So let's not just lump
everything together. Honestly, even that issue and those that argue for that—it's only sharpened my own thinking in this regard. And so I don't necessarily view this one-sided rhetoric as a negative. (M. Train, personal communication, Nov. 10, 2014)

While internship advisers do recognize that unpaid internships have value, they indicate that there is a socioeconomic impact on less advantaged students and it prevents students who cannot take an unpaid internship from gaining experience in the field. Many low-income students work 20+ hours/week, and simply can't afford to not work. This was clearly stated here, “Students do gain great experience from internships, and they are essential in today's job market, but if more for-profit companies offered compensation, it would be better for everyone involved” a survey respondent commented.

Of the survey responses, 58.8% indicated that socioeconomic inequities are exacerbated by unpaid internships. This is particularly true in the summer when some companies’ host well organized, meaningful internships programs, and the inequities show up when students want to do those internships, but they have to use those months to earn money for school. One survey respondent commented, “Our students are usually paying for their college degree on their own, so it can be a big impact. They must work in addition to doing an internship. It makes some internships impossible.” Some advisers felt more passionate about this dynamic:

Students who have the money to pay for tuition and can go off and do two or three unpaid internships get this advantage over the people who can't, so that's a big issue. I think that may be an even more important issue than all the other ones…how do you even the playing field a bit. I don’t have anything against people who come from plenty of money, but those are the folks that can do three or four unpaid internships, so they have this huge advantage over someone who cannot afford to do an unpaid internship. So yes, that's
another big thing that bothers me. (A. Potter, personal communication, Nov. 14, 2014)

As the cost of higher education continues to climb and the necessity of completing at least one internship while in college is tied more closely to a ROI from a college education, and paid internships are few and far between and often inaccessible, more must be done by colleges and universities to address the issue of socio-economic disparity in the arena of unpaid internships. More resources should be invested in offsetting the burden of completing an unpaid internship, or alternatively, more research should be conducted to identify paid internship opportunities. One internship adviser pointed out that there would always be some students that will feel that it doesn’t matter what they do, “as their parents will pay for housing. So it doesn’t matter if they only fetch coffee, because they got to live in New York City for the summer and work for a television show” (B. Sage, personal communication, Nov. 21, 2014). This attitude represents the antithesis of what internship advisers’ hope for when their students seek internships.

This socio-economic divide is not unique to unpaid internships and the potential opportunities they provide. Opportunities to participate in other forms of experiential education are also more limited for disadvantaged students, as one survey respondent commented, “I think students from a lower economic background are more challenged to do an unpaid internship. It is not isolated to just unpaid internships, they are also challenged to do any other experience outside the classroom such as study abroad.” Some colleges and universities are finding ways to offset those disadvantages through home school tuition (where all scholarships follow the student abroad), or funding a stipend for unpaid internships. Another such source is the community service work-study funding at Messiah College, which is federal government funding that students receive in financial aid applied to the community service work-study funding. That money is split between the career and professional development center just for internships, and
the other half goes to the service-learning center for their students. Other funds are sometimes secured from private donors that support students in unpaid internships. In one internship office, there were institutional funds “That are used at our discretion. In our office, if we see a student has financial need and maybe the internship is at a distance and the transportation costs are an issue, then we can provide some help that way” (M. Train, personal communication, Nov. 10, 2014). Another concern highlighted in the literature is the fact that some students do not have the benefit of a well-connected, prestigious social network. This is a place where an internship adviser can make a huge difference,

It's all about networking and sometimes the students takes advantage of networks that their parents or relatives have. Do I condemn that? No. That's part of what they're doing. Now, are there individuals who don't have those types of networks? Absolutely. But, can I be that networking contact for that student? Yes. So, I think there are ways that in my position for instance, if a student’s home is elsewhere, or whatever other reason they just don't have the contacts, we serve as that initial launching point for them. (M. Train, personal communication, Nov. 10, 2014)

While the policies and practices that the advisers followed aligned with their institutional educational philosophies, they often came up with best practices independently, without centralized oversight from academic leadership. These practitioners were all so committed to experiential education, the well being of the students they advise, and were well informed about the current DOL regulations, it was heartening for the future of this field. A deep level of commitment to experiential education was evident; as one adviser shared, “I very briefly will say I have experiential learning in my DNA” (A. Botts, personal communication, Oct. 31, 2014).
Alignment with DOL Fact Sheet #71

One of the goals of this research was to determine how closely aligned the DOL laws concerning unpaid internships were in relation to the current reality in practice. There are many stakeholders invested in quality internship experiences, the intern, the internship adviser, the employer and the U.S. Department of Labor. This group of internship advisers responded to a survey that included several questions addressing this alignment. This survey was designed using a 5-point likert scale, with a neutral response as an option. This question type was utilized to get an overall measurement of the participants’ opinions or experiences of that particular aspect of unpaid internships. A 5-point scale was chosen to ensure the greatest accuracy by limiting the number of choices the participants had, to avoid splitting the responses into too many categories. There were also several open-ended questions as well as an option to add a comment on most of the questions. The results of the survey are included in Appendix G, but the following is a written summary of the results.

Survey responses to questions 16-22 directly examined the perceptions the internship advisers had of the alignment between unpaid internships and the criteria outlined in the DOL Fact Sheet #71 (Appendix A). This Fact Sheet was reissued in 2010 by the U.S. Department of Labor, and highlights six criteria for unpaid internships that for-profit companies must follow in order to be in compliance with the law. These criteria were originally written into the Fair Standards Labor Act of 1937 (FSLA), yet the Fact Sheet #71 presents them clearly and in isolation from the rest of the act. In responses to survey question 16., From your perspective, the training the intern receives in the field placement is similar to the training they receive in their academic program, 47.1% strongly agreed or agreed, 29.4% strongly disagreed or disagreed, and 23.5% were neutral. This indicates that less the 30% of survey participants thought that criteria
#1 was not being met. In responses to survey question 17., From my perspective, the unpaid internship experience is for the benefit of the intern, 70.6% strongly agreed or agreed, 0% strongly disagreed or disagreed, and 29.4% were neutral. This indicates that just over 70% thought criteria #2 was being met. In responses to survey question 18., From my perspective, the intern completes work similar to a regular employee, 52.9% strongly agreed or agreed, 11.8% strongly disagreed or disagreed, and 35.3% were neutral. This indicates that over 50% of the survey participants believed that employers were not meeting the first part of criteria #3. In responses to survey question 19., From my perspective, the intern performs their tasks under the close supervision of existing staff, 82.4% strongly agreed or agreed, 0% strongly disagreed or disagreed, and 17.7% were neutral. This indicates that over 80% of the survey participants, felt employers were meeting the second part of criteria #3. In responses to survey question 20., From my perspective, the employer receives immediate benefits from the activities of an intern, 58.8% strongly agreed or agreed, 17.7% strongly disagreed or disagreed, and 23.5% were neutral. This indicates that close to 60% of internship advisers perceived those employers were not meeting criteria #4. In responses to survey question 21., Does the employer communicate clearly that there is no guarantee of full-time employment upon the completion of the internship?, 35.3% responded yes, 11.8% responded no, and 52.9% responded sometimes. This indicates that over 50% of the time internship advisers perceive that the employers do not meet criteria #5. In responses to survey question 22., Do you believe that the employer and the intern understand that the intern is not entitled to compensation for the time spent at the internship?, 82.4% responded yes, 0% responded no, and 17.7% responded sometimes. This indicates that over 80% of the time internship advisers perceive that the employers meet criteria #6. Internships advisers perceived that employers were meeting some, but not all of the DOL criteria for unpaid internships in the
for-profit sector over 50% of the time.

The survey responses were on a likert scale and included the response options of strongly agree, agree, neutral, strongly disagree, and disagree. While I did not directly determine what intent “neutral” indicated, I will surmise that it held different meanings for different participants. It could indicate that they simply did not know the answer, did not feel strongly one way or another, did not feel comfortable stating their position, or were conflicted about their perspective on that particular question. I included the percentage of responses that were neutral for all of the above questions, but these neutral responses were not included in the summary below.

In summary, criteria #1 was not being met, criteria #2 was being met, the first part of criteria #3 was not being met, yet the second part of criteria #3 was being met, criteria #4 was not being met, criteria #5 was not being met, and criteria #6 was being met. A loose calculation indicates that the DOL criteria for unpaid internships are being followed in less than 50% of circumstances.

In my examination of these results as well as my experience in the field, the DOL criteria for unpaid internships in Fact Sheet #71 are not being adhered to about 50% of the time. It is equally as clear, that internship advisers are communicating the guidelines as needed, and most feel that is the extent of their responsibility. Internships advisers have made adjustments, but not upended their practices. As one person indicated on the survey, “As we follow the internship lawsuits, we are being more careful and selective of internships to offer students. We also have been better about educating our employers about their responsibilities in an unpaid intern arrangement. Some previously unpaid internships are now paid, which does benefit the student.”

The impact of the reissuance of the DOL guidelines for unpaid internship has been felt across the border in Canada, according to Tina Brown.
Our Ministry of Labor, the provincial Ministry of Labor, has now been cracking down because of all the media hoopla in the US. What’s happening in Canada now is they’re actually auditing organizations that have unpaid interns and making sure that each student…who is doing an internship is attached to an academic credit. (T. Brown, personal communication, Nov. 20, 2014)

There seemed to be consensus that employers had knowledge of and were responding to the reissuance of the DOL Fact Sheet #71. One adviser perceived that “sites are beginning to understand the law, so that they know what they can and can’t do. A site where students will get feedback on a regular basis on their work, is more clearly following the guidelines” (A. Botts, personal communication, Oct. 31, 2014). Advisers felt it was their job to inform employers about the DOL law, but are not in a position to regulate it. As long as an adviser felt that an employer understood that a for-profit employer should be paying interns and they believe they meet the Department of Labor guidelines, as one advisers communicated with an employer that he was “concerned that you not get in trouble with the government should somebody come knocking, and they wrote back and they said yes, we've reviewed these guidelines and we feel that we're meeting all of them and we're still not going to compensate. I felt like I had done due diligence” (M. Train, personal communication, Nov. 10, 2014).

While the DOL Fact Sheet #71 was reissued in 2010, the ramifications of it have been slow to emerge. There have been a few high profile lawsuits, and frenzy in the media about the crisis with unpaid internships, but the practitioners in the field have not encountered multiple instances when the law has significantly impacted them yet. As Duane noted:

I don’t think the DOL laws have impacted us yet, I do think at some point it will. I have actually asked our leadership here to really start thinking about if these unpaid internships
went away, what we do as an institution? So we're really trying to figure that out, trying to identify more paid internships for students so that we have a good amount of them. It hasn't impacted us yet, but I do believe it's coming. (M. Duane, personal communication, Nov. 11, 2014)

Another adviser added, “maybe fortunately these lawsuits and issues that have popped-up here and there are changing the system slowly but surely now that the federal government’s involved a little bit more closely and paying attention to these things. I think it’s a good thing” (J. Cates, personal communication, Nov. 17, 2014). Internships advisers studied here, indicted that to be ahead of the curve was desirable. They believe if they are not transparent they will get themselves into questionable circumstances without any defense. If they haven’t educated the employers in what needs to be a paid experience and if they haven’t done due diligence to differentiate between what needs to be paid and what can be unpaid, then what do they fall back on? Some advisers feel they have to be proactive, as indicated by this adviser, “If we don’t have the transparency and the documentation and some student does file a wage and hour claim against us, where’s our defense, if we haven’t shared information about the DOL regulations?” (A. Cable, personal communication, Nov. 20, 2014).

All stakeholders involved with internship programming tend to be doing more with less since 2008. Higher education is facing some major challenges with regards to the shrinking population of traditional college students, and the escalating cost of a college degree. Employers, who are recruiting unpaid interns, are doing so for a reason–they cannot add part-time paid employees to the budget. Students are scrambling to acquire the necessary skills, experiences and aptitude to render them marketable within the discipline in which they chose to earn a college degree. All those involved with internship programming need information and guidance,
Organizations may need guidance in understanding the parameters of an internship, as well as in determining what makes a good internship program. Supervisors and internship coordinators need be accessible each day the intern is on site. They need oversight about what tasks are suitable as well as what number of hours may be considered reasonable. Employers have to recognize that compensation and credit are separate entities. Educators decide if such work is educationally sound and would meet learning objectives established by the curriculum. Employers decide to pay or not pay the student intern. They are not contingent on one another. (Settje, B., 2014)

**Institutional Policies and Resources**

The policies internship advisers utilized for publicizing or endorsing unpaid internships in the for-profit sector varied across the campuses studied. There appeared to be a relationship between the formality of the policies and the resources allocated to internship programming. The greater the resources allocated, the more clearly outlined were the institutional policies. There was not one example of an institutional policy that outright banned unpaid internships in the for-profit sector, yet there was consensus that the practice was discouraged, through interactions with both employers and interns. At Johnson & Wales, the solution to the challenges posed by an unpaid internship, in any sector, non-profit, for-profit, and government, is to fund a $1,500 stipend for each student participating in an unpaid internship. This represents a large commitment, as Dumas noted,

> It is out of our operating budget, and it is almost a $4 million investment every year for the university. I went before the trustees to get approval for this, and I did get approval...we’re in our third year, but I would like for us to raise some funds. We’re a nonprofit and our money has to go towards our students. I would love to generate more
funding, and I think there’s opportunity for us to do that. (M. Duane, personal communication, Nov. 12, 2014)

Many employers require academic credit for a student to participate in an unpaid internship, as the belief is that it “represents training that would be given in an educational environment,” as specified in criteria #1 (DOL, 2010). Many advisers also contend that academic credit offers some protection for their students, “So we do have other credits because we want to protect our students, we want to make sure they are getting the right experience, we kind-of like that protection for our students when they’re out there in the field” (J. Cates, personal communication, Nov. 17, 2014). If the students are enrolled in academic credit, the assertion is often made that there is some academic oversight.

**Outcomes**

Another theme that emerged from the data was a discussion of outcomes, both learning outcomes, as well as more concrete outcomes, such as a full-time professional job offer. All the participants voiced the correlation between an internship and robust learning outcomes, as well as professional development, including employment. At Quinnipiac, the job placement rate for the class of 2012 was 91%, and the class of 2013 is an 89% placement rate, and that was with a 75% response rate from the graduating Communications majors. Cates felt positive about these results, “This is pretty high on the placement rate for the media industry, in which everybody says there are no jobs. So what we’re seeing is, our students are turning these internships into jobs, not always at that exact company, but it’s leading to other opportunities” (J. Cates, personal communication, Nov. 17, 2014). Other outcomes, beyond a full time job, hold value as the benefits are recognized. Advisers look closely at to what students did at the internship and what was the intent from the employer who hired them. If an employer made a point to introduce the
student to persons A, B, and C and gives them time for guided supervision, or the opportunity to do a job shadow and will ensure that paid staff will be available for mentoring, that all adds value to the internship. Across all the participants there was the sense that incoming college freshmen understand the role that internships will play in their career, as voiced by one adviser, “When I started working here in 2001, we never saw freshmen walk through our doors, and 10+ years later, we not only have freshman walking through our doors, they’re coming in on the first day of classes and asking how to find internships. It’s a huge difference” (B. Sage, personal communication, Nov. 21, 2014).

Conclusions

The internship advisers that participated in this study demonstrated a level of commitment to being student-centered, and they were consistently passionate about creating experiential education opportunities with rich, positive outcomes. There was a level of sincere collegiality amongst internship advisers discovered. A response from M. Train expresses sentiments encountered in all of the people interviewed, “Everybody's trying to do good things. I haven't come across anybody who just really doesn't care about students or doesn't care about the quality of the work. Everybody wants to do something better with the current processes or procedures, forms, and it's been very rewarding” (M. Train, personal communication, Nov. 10, 2014).

It appears that practitioners want to find a unified voice with which to discuss the issue of unpaid internships:

I do wish that higher education would try to have a voice in this discussion about unpaid internships. Some institutions connected to higher education have their statement out there, but it would be really valuable to us as a unified entity, to join forces and say we do
believe in this, we think there is a learning experience, and we as a partner to industry will make sure that this is a learning experience and that it's not what you see in the headlines, that unpaid internships are exploitation. If a higher education partner is involved and they make sure that the internship is a good learning experience, we should have a voice in this discussion. A unified voice would be helpful. (M. Duane, personal communication, Nov. 11, 2014)

The issue of accountability on the part of all stakeholders is important; it is up to educators, employers and students, to ensure that educational elements beyond the day-to-day tasks are incorporated into internships. Employers need to know what is considered legitimate and beneficial and educators need to be comfortable holding employers accountable. Students need to ask good questions and make good decisions as this is how students develop critical thinking skills, a sought after attribute. Effective communication can play a key role in guiding stakeholders through the changes that will come as a result of the DOL guidelines, “The process does not need to be hostile or confusing; it can be supportive and beneficial. Personally, I look forward to working with employers and students, to facilitate the learning and creating new, better internships that are worthwhile for all involved” (Settje, B., 2014).

The factors that contributed to the DOL reissuing the guidelines for unpaid internships are numerous, and likely involve a sequence of events. First, the confluence of the need for college graduates to have professional experience to be eligible for jobs, the recessions in the early 1990’s and late 2000’s, and a recognition of the value in experiential education led to an explosion in the number of unpaid internships. Secondly, an examination from the legal field, of what is known as unpaid law externships, and the possibly exploitive, illegal nature of these, led
to several scholarly inquiries. And lastly, a few high profile lawsuits brought by interns, who sued for back pay from Conde Nast and Fox Highlight Pictures, encouraged widespread media scrutiny starting in 2008. Brown felt this was somewhat like the perfect storm and the “media has kind-of been enabling the process with what happened in the U.S. in large organizations, with very healthy bottom lines becoming intern-mills. So we have to look at the guidelines and make sure that people are abiding by these guidelines” (T. Brown, personal communication, Nov. 20, 2014).

What became clear through the analysis of these findings was there is consistency across the different campuses, in the perspectives of internship advisers, from both the survey and the interviews, for most of the themes. In the areas of integration of learning outcomes and evaluation and institutional policies and resources there were more discrepancies between advisers. In all the other areas, the lived experiences of the participants from large and small, public and private, rural and urban, colleges and universities held some uniformity that was somewhat surprising. The common threads of an emphasis on learning outcomes and assessment, an emphasis on communication between academia, employers, and interns, an emphasis on clear, and well-informed practices and protocols for both employers and internship advisers with regards to unpaid internships were described over and over throughout this study. Not only did the empirical evidence point to these threads, these were also the threads discovered in the literature on the topic. The current thinking about experiential education, and specifically academic internships is cohesive and is responding to the DOL guidelines in fairly uniform ways. It appears there is a formula emerging, from across the spectrum of programs. This formula is being conceptualized by academic internship advisers, who are passionate about the potential for transformation from field-based learning through internships. At the end of the day,
there was clearly the sense that Herman Schneider’s vision of experiential education is alive and well in higher education in 2014.
Chapter V: Implications and Recommendations

The Problem and the Purpose

This study discovered the perspectives and practices of internship advisers in the face of increased oversight by the federal government, and increased scrutiny by the media of unpaid marketing communications internships in the for profit sector. For some college students, unpaid internships provide meaningful outcomes; for others, very little is gained and the lack of compensation becomes a larger issue. The internship experience during college has become a requisite of securing full time, professional employment upon graduation (Coco, 2000). In 2010, the U.S. Department of Labor reissued guidelines for unpaid internships in for profit organizations to ensure that unpaid interns were receiving educational benefits in exchange for their time, in lieu of wages. These guidelines have posed challenges for industry, college students, and academic advisers, as a high percentage of internships in the marketing communications sector have routinely been unpaid (Alpert, Heaney, & Kuhn, 2009).

This study focused primarily on the experiences of academic internship advisers, to understand how their perspectives and practices may have changed as a result of the DOL Fact Sheet #71. To ascertain the impact of the DOL criteria on internship advisers’ approach and communication practices, as well as any changes to programming those practitioners initiated as a result of the DOL Fact Sheet #71 (Appendix A: DOL Guidelines for Unpaid Internships), this study utilized the following research questions:

1. Have guidelines for unpaid internships, reissued in 2010 by the DOL, impacted the practices of internships advisers?

2. How closely aligned are the intern’s learning objectives, with
   a) the internship roles and responsibilities provided by employers?
b) the guidelines for unpaid intern’s roles and responsibilities set by the US
Department of Labor?

3. Have DOL guidelines for unpaid internships impacted the availability of internships
opportunities, and if so, what are the likely consequences?

In Chapter One, a brief history of cooperative education in the U.S., which is also the
foundation of internship programming, was presented. The problem of practice, the impact of the
DOL criteria on unpaid internship in the for-profit sector, was then discussed and it’s
significance to educational research, practice, and policy in 2014.

In Chapter Two, a comprehensive review of the literature concerning experiential
education, and the intersection with the Fair Standards labor Act of 1937, was discussed. In
addition, internship programming, specifically unpaid internships, assessment of work-integrated
learning, and the educational and social impact of unpaid internships were examined. Lastly, the
challenges and pressures experienced by all stakeholders, academic internship advisers,
employers, and college students were discussed.

In Chapter Three the research design was presented, including the methodology of a
collective case study, the choice of the theoretical frameworks, informal learning (Eraut, 2004)
and the 5-stage model of skills acquisition (Dreyfus & Dreyfus, 1980), a description of the cases
selected, and participant recruitment and access. Chapter Three briefly summarized the
significance and implications of this research.

The results presented in Chapter Four suggest that internship advisers have made some
adjustments in their advising practices, but only in part as a response to the DOL criteria for
unpaid internships. Many advisers have further refined their best practices, with the focus on
learning as the essential outcome of an academic internship, as their understanding of
experiential education has evolved. The development of critical thinking skills and self-efficacy (Bandura, 1977), as well as the ability to be adaptable, are valuable outcomes that can be applied to any new challenge. As an analogy, learning to fish is more valuable than being given a live catch for dinner.

This study used the lens of informal learning (Eraut, 2004), along with the 5-stage model of skills acquisition (Dreyfus & Dreyfus, 1980), to discover more about the alignment of the DOL criteria with learning objectives and outcomes from unpaid internships, as specified by both the academic institution and the employer. Additional themes that emerged from the empirical data collected through an on-line survey and eight responsive interviews were indicative of how the reissuance of DOL Fact Sheet #71 (Appendix A) had impacted the academic structure of internship programming, including institutional policies and resources, the integration of academic learning into internship experiences, the interface with employers, and the ongoing availability of unpaid internships. These findings were arrived at through an analysis of the results from an on-line survey, generated through Survey Gizmo, an examination of 240 pages of interview transcripts, and a thorough examination of the existing literature on this topic.

Chapter Five will explore these findings further and place them within the context of the literature on experiential education, unpaid internships, return on investment from higher education, and other challenges facing college graduates in 2014. Implications of the study for educational research, practice, and policy are then presented. This chapter concludes with a discussion of the limitations of this study and recommendations for future research that could build on these findings.

**Meaning of the findings**

Through the research questions posed in this study, the researcher sought to understand if
and how internship advisers had changed their practices and perspectives of unpaid internships in response to the DOL Fact Sheet #71 (Appendix A). Through the lens of informal learning (Eraut, 2004) it was discovered that if the learning that occurred through an internship was the result of learning objectives set up in alignment with the DOL criteria for unpaid internships, and/or the expectations of the employer, as evidenced by the description of the intern’s role and responsibilities, the unpaid internship was in compliance with the law. Roles and responsibilities could be referred to as a “job description” but the term “job” often implies monetary compensation. To avoid confusion, the terms “role and responsibilities” were used. The learning outcomes that typically include the acquisition of skills were examined in relation to the 5-stage model of skills acquisition (Dreyfus & Dreyfus, 1980) in which a learner moves through a process, taking them from the stage of novice to the stage of expert.

When an intern is at the novice stage, they do not know what to do, they must consider everything, and they feel compelled to learn and abide by the rules (see Figure 2). To move beyond this novice stage, in the early part of the internship, Lord, Sumrall, and Sambandam (2011), assert that an employer should ensure that work requirements are compatible with the students current capabilities to avoid a feeling of “role conflict, a phenomenon know to detract from performance” (p. 14). As the student moves through the stages of advanced beginner, to competent, to proficient, to expert, they work with increasing intuition, meta-cognitive ability, and have more relevant focus on the tasks at hand (Dreyfus & Dreyfus, 1980). This process was validated as an indication of quality in an experiential education program by Harvey and Green (1993), as the transformative view, when fundamental changes have taken place as a result of a work placement (as cited by Von Treuer, Sturre, Keele, & McCleod, 2011). The evidence presented here suggests that internship advisers seek to guide this process of transformation
through an internship. This belief in the transformational experience that occurs in an internship through the process of informal learning (Eraut, 2004) and the acquisition of skills (Dreyfus & Dreyfus, 1980) fuels the internship adviser’s commitment to a well structured internship program, the integration of academic learning, an effective interface with employers, clear institutional policies in regards to compliance with the DOL Fact Sheet #71, and efforts to assess learning outcomes from work integrated learning, or internships.

Assessment of learning outcomes from traditional academic courses has become more important in academia in the past few decades. With the pressure to demonstrate a ROI from a college degree, evidence of concrete learning is critical to many stakeholders in academia. Additionally, assessment of learning outcomes from internships has become critical in establishing the value of internship programming, in regards to both ROI from a college degree, as well as compliance with the DOL Fact Sheet #71. Additional data that is important to include in this discussion about unpaid internships is the impact the DOL Fact Sheet #71 has had on the availability of unpaid internships, how the lack of compensation impacts a cycle of socio-economic disparity, and lastly how the institutional resources allocated for internship programming on campuses impacts the quality of such programming and subsequently the outcomes from internships.

Several of the themes that arose from the findings confirmed what was discovered in the literature. Internship advisers who held the rank of faculty or were in a close, collaborative, advisory role with faculty felt they had more success integrating the internship experience with the student’s academic program. This integration led to more robust learning outcomes that aligned more closely with the DOL criteria. When the structure of the internship programming was on “the academic side of the house,” an appraisal of what was being learned, how it was
being learned, and what factors affected the learning (Eraut, 2004), was easier to accomplish. Internship advisers perceived that they had a closer connection to the intern’s learning experience as they read their reflections or journals, heard their oral presentations, and reviewed the employer’s evaluations. There was a clear correlation between having the internship programming integrated within the academic structure and the adviser’s ability to determine if the students’ learning objectives and outcomes were aligned with the DOL criteria (DOL, 2010), as well as the employer’s expectations as outlined in the description of roles and responsibilities.

Achieving maximum benefit from an unpaid internship for all stakeholders is a complex process that requires accountability, clear communication, and commitment. Sapp and Zhang (2009) underscored this concept:

We have a responsibility to assess our students’ internship experiences to confirm that defined learning objectives are being met, that students’ experiences are consistent with our programs’ mission, and that the expectations of those who share responsibility for supervising our student interns and who eventually employ our programs’ graduates are being considered. (p. 281)

The interface with employers and the requirement of a performance evaluation of the intern are important components that keep the focus on the learning. Sapp and Zhang (2009) assert, “a more systematic approach to using industry feedback is warranted as a valuable component of the overall assessment of student learning outcomes” (p. 280). Assessment practices of experiential education are not well developed across the globe, yet are critical to understanding the value inherent in unpaid internships, as well as other forms of work-integrated learning. Determining the value of unpaid internships by assessing the learning outcomes of these experiences is of primary importance to all stakeholders. A discussion of assessment
protocols for work-integrated learning (WIL) is warranted as understanding assessment informs the research undertaken in this study.

Sturre Von Treuer, Keele and Moss (2012) promote the use of formative assessment (using judgments for the purposes of ongoing improvement), as this facilitates learning and reflection, appropriate in education. What is learned from formative assessment is incorporated into adjustments made to the content or context of the learning. The formative assessment process is utilized in a developmental way to further the student’s learning from the placement and the activities therein. There is a feedback process inherent in formative assessment protocols. Attention is given to the development of “tacit competencies that enhance the immediate and future employability of students” (Sturre et al., 2012, p. 73). The assessments may determine how successfully a student is moving through the 5-stages of skills acquisition (Dreyfus, 2004) while participating in an internship. While there are many effective outcomes from formative assessment practices, there are some limitations as well. Sturre et al. (2012) discuss the limitations of formative assessment practices, including the facts that it is resource intensive, assessors should be trained, and how there is a need for multiple assessors.

Dunn, Shier, and Fonseca (2012) developed an assessment model for multidisciplinary workplace settings. The model promoted the use of a multi-faceted portfolio, which included “a series of structured written reports, the development of learning objectives and reflective summaries, the development of an experience record sheet, a map of students’ graduate attribution development, and the submission of a cumulative collection of work as a portfolio” (p. 139). According to Dunn et al. (2012), “The authenticity of this approach was increased as the employer was required to authenticate the portfolio” (p. 141). Alpert, Heaney, and Kuhn (2009) developed guidelines for what should be included in a formative assessment. The
components that Alpert et al. (2009) recommended for inclusion were a draft of the internship project proposal, a mid-semester progress report, and a major report applying textbook principles, to be reviewed by both the employer and the faculty supervisor. Alpert et al. (2009) found that a portfolio of work, activity logs, weekly reflection journals, literature reviews, article analyses, oral presentations, and final reflection papers had “all been used as part of assessment” (p. 38). Jaekel, Hector, Northwood, Benzinger, Salinitri, Johrendt, and Watters (2011) postulate that students should be assessed through a variety of methods that are not only objective (tests), but also subjective (portfolio review, observations, oral presentations), so they can “reflect on their performance and make necessary adjustments that will foster growth” (p. 22). Whatever the methodology used for assessment or what artifacts are included in assessment; findings should be aligned with the DOL criteria, employer expectations, and institutional learning goals.

The literature reveals that there is tremendous variability in the responsibility for whom conducts assessment. In some cases, assessment is conducted entirely by faculty, in some cases, assessment is balanced between employer and faculty; additionally, in some cases, students’ self-assessment, peer-assessment, and portfolios are a significant part of the final evaluation, at other times portfolios are not included at all. In a majority of the models reviewed, in the literature as well as the empirical data collected here, a student’s final evaluation was a combination of feedback from the employer, the faculty member, and from a student’s demonstration of capabilities via written work and reflection. Alpert et al. (2009) found that grading and “maintaining the integrity of the grading process,” (p. 39) was a challenge. Some employers’ welcome being involved in the students’ evaluation, others do not. Academic supervisors often prefer to retain control of the grading, but most solicit feedback from the employer as a weighted factor of the grade (Alpert et al. 2009). This was evidenced in the data collected through the
survey and the interviews for this study. Maxwell and Lopus (2001) identified a “Lake Wobegon effect” (p. 201) in student self-reported data. In short, self-perception was inflated positively and did not reflect objective reality. This calls into question the validity of students’ self-assessment data in evaluating their internships. Cooke and Cambell (1979) also identified self-reported data, using surveys, as potentially biased, as students have a tendency to report what “reflects positively on their abilities, knowledge, and so forth” (as cited by Jaekel et al., 2011, p.15). The portfolio assessment model, put forth by Dunn et al. (2012), required the engagement of students, faculty, and employers. While this triangulation approach lends itself to greater authenticity, it requires a great amount of time and other resources. Ferns and Moore (2012) indicate that assessment of WIL is a multidimensional task, which blends “teaching, facilitating grading, grading, and organizational and interpersonal skills for successful implementation” (p. 219). Ferns and Moore (2012) also recognized this process as resource heavy, but saw it as a necessity for universities to move to an “evidence-based and standards-focused regulatory framework” (p. 219). As the demands for a ROI from a college degree and compliance with DOL regulations increase, assessment protocols will become a more visible requisite in internship programming.

The introduction of assessment protocols as a standard component of any internship program will require another layer of diligence. Some colleges and universities have assessment practices for internships in place. Some would need to be developed. The steps involved in establishing assessment practices for field-based learning would involve a program evaluation, a defined list of desired learning outcomes, an assessment tool, and an excellent communications strategy to roll out the assessment initiative. Accountability for administering the program, collecting the results, analyzing the data, and reporting the results would have to be assigned.
While this may be resource intensive, it is indicated as an essential component of internship programming yet to be fully developed.

Any practice that exacerbates socio-economic disparity and perpetuates unequal access to opportunity has implications for social action and change. A few of the participants’ referenced initiatives and programs they had in place to offset this disparity in opportunity. It behooves employers and internship advisers to push for resources to be put towards stipends or other solutions to offset the costs to students of completing unpaid internships. One outcome of a unified voice from academia could be increased pressure on the federal government to create funding, similar to financial aid that could be allocated for experiential education, based on need. While there was agreement amongst the participants that this issue was problematic, it did not appear to be critically central to internship advisers strategic planning as of now.

The findings did not complicate or contradict what is known from the literature about unpaid internships, but did shed a brighter light on the complexity involved in the successful oversight of internship programming. There do seem to be contradictions inherent in some of the criteria in the DOL guidelines in relation to some tenets of experiential learning (Kolb, 1984), which many believe underpins experiential education (Conrad & Hedin, 1981). This study makes a distinction between the two, and differentiates experiential education as including guided reflection, evaluative feedback, and assessment of learning outcomes. Learning outcomes are emphasized by criteria #1, “The internship, even though it includes actual operation of the facilities of the employer, is similar to training, which would be given, in an educational environment” (DOL, 2010). However, criteria #4, “The employer that provides the training derives no immediate advantage from the activities of the intern; and on occasion its operations may actually be impeded” (DOL, 2010) contradicts the premise that an intern learns by doing,
and by actively engaging in the work of the field.

The findings revealed that most internship advisers seemed to ignore these two criteria (criteria #1, and #4), as they do not appear to serve any of the stakeholders involved, and actually would render an internship less useful through the frameworks of informal learning (Eraut, 2004), and the 5-stage model of skills acquisition (Dreyfus, 2004). The literature supported the notion that these two criteria were the ones that both employers and internship advisers were lobbying the DOL to make adjustments to (Curiale, 2010).

**Significance of the findings**

There is relevance of the study at this point in history for all stakeholders involved with unpaid internships. As the survey documented, unpaid internships comprise approximately 65% of available internship opportunities, and 45% of these are in the for profit sector. The magnitude of this phenomenon alone renders it relevant. In addition, college graduates need the practical and professional experience gained from an internship on their resume to compete for professional positions, and the complex, deep learning that occurs through the process of completing an internship cannot be attained easily through other avenues while enrolled in college.

Most of the participants surveyed or interviewed for this study were trying to sort out what specifically their policies and practices should be in regards to unpaid internships. As the DOL Fact Sheet #71 was reissued in 2010, it remains somewhat “new” information. Some advisers perceived that it had, thus far, had little impact on the employers they were working with yet did feel it was important to be transparent about these criteria with both students and employers. Learning what other internship advisers are doing about this law is absolutely relevant to the participants in this study. As the participants are finding their way, they are paying close
attention to the media, and gaging how to position their institutional policies in relationship to the law. All the advisers clearly want what is best for the students involved, but recognize the value in the experiences gained through unpaid internships. In fact a few advisers felt these unpaid experiences may be more worthwhile than a paid internship experience. The value is often derived from the factors that impact the learning, such as having an alumna of the program as a site supervisor. Some internship advisers tap into alumnae for quality internship placements. Alex Potter has had such an experience, “I use the Herald as an example because Erica’s there and has hosted unpaid interns in the past and it has become a really valuable experience for the intern because she is an alumna, so she knows the students, knows the program, and takes the time to mentor and work with the students” (A. Potter, personal communication, Nov. 14, 2014).

Other findings from this study that impact academic institutional policies and practices have implications for legal counsel and human resources. This study did not go into depth about the lack of legal recourse an unpaid intern has in regards to harassment on the job, through Title VII of the Civil Rights Act of 1964 (Edwards & Hertel-Fernandez, 2010), as they are not considered an employee. This is a reality that the students should be made aware of prior to accepting an unpaid internship, as it may encourage them to scrutinize the company culture more closely. In addition, the internship advisers should be more proactive and have a system in place for terminating a contractual agreement with an employer if a discovery of harassment is made. The intern, while in the field, is not necessarily covered by the insurance policies of either the employer or the academic institution. While they are enrolled in academic credit, they are off the premises, and may or may not be covered by the college’s liability insurance depending on the terms of the policy. Given that none of the participants referred to liability or harassment issues, there have likely been few cases where either has been notably problematic. Taking a proactive
stance, however, would be a wise approach for internship advisers and academic institutions.

A proactive stance for internship advisers would necessitate that internships are a central focus and component of the strategic vision of the academic institution. With knowledge comes power, so internships advisers would need to be fully versed in all aspects of the DOL laws, current litigation concerning unpaid internships, and Title VII of the Civil Rights Act of 1964, which could possibly impact students completing internships. Advisers would need to be able to access their institution’s legal counsel, and thereby institutionalize their institutions policies for unpaid internships and any issues resulting from Title VII of the Civil Rights Act of 1964. Academic institutions would need to embrace knowledge of the laws, and communicate that knowledge as needed to employers and students. The ambiguity of the legality of unpaid internships has allowed practitioners to be casual in their practices and policies. This casual approach would need to be challenged for academic institutions to take a proactive stance. This legal training and information sharing, the development of clearer policies and guidelines for unpaid internships, and clear communications with employers would require resources and commitment from internship advisers and the academic institution.

Issues regarding the availability of internship opportunities are also significant at this time in history and relevant to these participants. Given the fact that completion of an internship, while in college, has become a requisite for employment, there is genuine concern about internship opportunities becoming more competitive and less plentiful. The inherent Catch 22 underlying this concern is that to win a quality internship, one must have professional experience, yet to gain professional experience, a student must complete an internship. This is where the internship adviser, and having internships integrated into the curriculum, can both play a strategic role. An internship adviser can become an advocate for a student who may be
struggling with the internship search or making relevant connections. Many students do not have access to a well-connected network of professionals, with hiring power, which may come part and parcel with greater socio-economic status. The internship adviser may be able to fill this void with their industry network, if time and resources allow.

This process of informal learning (Eraut, 2004) as well as the acquisition of skills through the 5-stage model of skills development (Dreyfus, 2004) should be positioned more prominently in the dialog between stakeholders about internship programming. The rhetoric of the benefits from internships has become primarily focused on the outcome of securing professional employment, signifying a return on investment (ROI), given the context of the economic crash of 2008. Yet the benefits gained from an internship are more multidimensional and result from transformational learning (Mezirow, 1997, McRae, 2014). Internships advisers understand there is more to an internship than a job offer. An undergraduate college student can experience a multitude of outcomes from an internship, from greater confidence, an understanding of team process, organizational culture and organizational hierarchy, oral and written communication skills, critical thinking skills, and of course, the skills of the discipline. These outcomes all result in greater self-efficacy (Bandura, 1982). Self-efficacy, in essence, is the key to empowering a college graduate’s ability to take the next step in life. The empowerment that comes from moving through each of the 5 stages of skills acquisition (Dreyfus & Dreyfus, 1980) is palpable.

If a student is paying tuition for the internship credits, there needs to be a structured curriculum in place to warrant that cost. While the findings demonstrated a consistent commitment to learning outcomes and an integration with academics, the delivery systems were varied across the campuses studied. One adviser was particularly articulate about how she determined if robust learning outcomes had been attained, “I need to grade on what the student is
telling me and demonstrating he or she learned. The supervisor is evaluating the quality of the work. The person could have done great work, but if that individual could not articulate what he or she learned from it, or could not make the connection from the work in the field to the research paper, then that student doesn’t pass the internship” (B. Sage, personal communication, Nov. 21, 2014). There is significant pressure on academic institutions from parents, students, and the U.S. government to deliver a ROI from a college education. This has given rise to the rhetoric about job placements, and internships translating into full-time employment, as the only outcome that is promoted. While the outcome of a job offer from an internship was perceived as valuable to the participants, many voiced that other outcomes had significant value as well.

The DOL criteria were reissued to ensure that a student completing an unpaid internship is not a victim of exploitation, and ensure that unpaid internships do not become a lever that drives down the minimum wage (Curiale, 2010). The DOL became involved with the regulation of unpaid internships as the practice had spun out of control, and students were not getting the value, or the results, that had been promised from the experiences. In the past decade, internship advisers have strategically worked to put systems and policies in place so that employers will be in compliance with the law, but also to ensure that significant learning outcomes are achieved through internships. Internship advisers have risen to the challenge to ensure that certain challenges for interns have been addressed, such as communication with one’s supervisor, as Betsy Sage outlines,

Can the student approach this employer and say ‘I am not getting the learning that I thought we were going to get.’ If the student cannot approach their supervisor, that’s definitely an obstacle. We also have employers who are never trained how to supervise, so sometimes that’s problematic. The supervisors aren’t available, the supervisor does not
teach the student correctly, they just say here’s your project, let me know if you have any problems or questions, and then they just leave the student to flounder. Sometimes students run out of work to do and then they’re just endlessly waiting to be assigned work. But mostly, I’d say it’s cost, whether it’s financial cost or cost in time, are probably the biggest hurdles. (B. Sage, personal communication, Nov. 21, 2014)

**New Methods Discovered**

While there were not new tools developed as a result of this study, there was certainly an awareness developed of consistent best practices to ensure that employers and colleges comply with the DOL guidelines, while being cognizant of the informal learning (Eraut, 2004) that occurs, and the progress a student can make through the 5-stages of skills acquisition (Dreyfus, 2004) while participating in an unpaid internship. The new thinking that arose as a result of this study was that there are clear linkages between all the themes that emerged from the empirical data (see Figure 6). The way in which internship programming is structured and positioned within the academic institution can ensure an integration of academic rigor into the internship experience, the effective interface with employers, compliance with the DOL guidelines, and the development of transparent institutional policies. If adequately resourced, internship advisers can focus on maintaining an adequate supply of quality internships for their student body, work on addressing the issue of non-compensation as a serious obstacle for some students, and ensure that assessment of learning outcomes from internships is institutionalized. For successful cultivation of meaningful, educational internship experiences, which are in compliance with the law, there needs to be a cooperative approach, with, clear communications, between academic internship advisers and employers (Bull, 2014).
The participants in this study, while they work in very different academic contexts, seemed to speak the same language about experiential education. The focus on the learning, along with the commitment to guiding the interns through the internships to ensure maximum benefit gained, were common threads for all these participants. These findings will be understood and are applicable for the participants in this study. Additionally, the findings could be relevant to other educators involved with experiential education, from high school teachers to...
graduate school faculty, and possibly elementary after-school or summer school teachers.

Recognition of the three-way collaboration between student, educator, and third party employer (or client), is critical to the success of any project-based learning.

**Contributions to Practice, Policy and Scholarship**

The contribution of this study to **practice** is threefold. 1) It establishes the continued value of the learning outcomes from an unpaid internships that cannot be gained through other avenues, 2) it sheds light on the socio-economic challenges of the unpaid internships, which could result in the allocation of funds for stipends for students who demonstrate need, and 3) it highlights the need to clearly demonstrate learning outcomes from unpaid internships through assessment. The significance for **scholarship** is to 1) develop curriculum that supports the acquisition of skills and aptitudes that employers are seeking in interns, making them more competitive, and 2) develop appropriate assessment methodology to determine and measure learning outcomes from unpaid internships. The implications for educational **policy** is 1) expose the companies or industries which are promising and then not delivering on the promise of gainful employment or other tangible educational outcomes from an unpaid internship experience, 2) create a legislative arm to provide oversight of the U.S. labor law, possibly within the Wage and Hour Division, to monitor employer’s recruitment and hiring practices for unpaid interns, 3) mandate that colleges and universities communicate a stronger position on the guidelines for unpaid internships in relation to U.S. labor law to ensure that employers comply with the terms of the U.S. labor law when posting internships, and 4) mandate that employers and academic institutions publically post the DOL Fact Sheet #71, and the Title VII of the Civil Rights Act of 1964 (Edwards & Hertel-Fenandez, 2010), to ensure that all stakeholders are informed about these laws. These contributions are broad strokes, within the reach of a doctoral
thesis, that would need a greater allotment of time to fully develop (Butin, 2010).

**Limitations and Future Research**

In addition to the limitations stated in Chapter Three, the other limitation of the study was the fact that the participants directly represented the perspectives of just one stakeholder group, internship advisers. The researcher chose this participant group as the insights gathered from this group were the most relevant to the researcher’s professional practice. With 18 years of professional engagement with the other two stakeholders groups, college students, and employers, I ascertained that the most value would be gained by focusing on this one group. In regards to future research on unpaid internships, there are several topics that warrant further study. As the business world responds to increased globalization as well as costs of office space and operating costs, more and more business is being conducted virtually. This means that there are an increasing number of virtual internships being offered to college students. While it may seem appealing to be able to participate in an internship from one’s dorm room, there is less of a guarantee of structured feedback and supervision, and less opportunity to learn about organizational culture. A study about unpaid virtual internships would be timely and relevant for educational practice, policy and scholarship. Another topic that warrants further research is the assertion that unpaid internships increase a student’s college debt. This may be the case if the students are not earning academic credit for their internships, but if academic credit is being earned, those internship experiences and the costs associated with them go towards the requisite credits for a college degree, and therefore do not add to the total cost of the degree. Additionally, if the U.S. Department of Labor develops criteria for the regulation of unpaid internship in the non-profit and government sectors, this will be an additional topic worthy of investigation. Another implication for further research utilizing informal learning theory (Eraut, 2004) and the
5-stage model of learning (Dreyfus, 2004) could be a study of lifelong learning or lifelong professional development. Eraut (2004) concludes, “In most organizations the practical implications of strengthening informal learning for developing the individual and collective capabilities of employees are not yet fully understood” (p. 271).

Conclusion

This study set out to determine how the landscape of unpaid internships in the marketing communications sector has changed in relationship to the guidelines for unpaid internships, reissued in 2010 by the DOL. The research was conducted to discover if the DOL Fact Sheet #71 (DOL, 2010) had impacted the practices and perspectives of internships advisers. It is clear that the DOL criteria for unpaid internship in the for-profit sector have had influence on the landscape of unpaid internships. There has been the need for increased communication between internship advisers, employers, and college students, as well as increased institutional transparency about policies concerning unpaid internships. There has been an increased focus on and insistence for concrete learning outcomes from unpaid internships on the part of internship advisers (Guthrie & McCracken, 2010). In addition, there has been an increased effort to conduct assessment of learning outcomes and to determine if and how these learning outcomes align with institutional or discipline-specific learning goals. Lastly, there has been a clearer distinction drawn by educators between experiential learning (Kolb, 1984) and experiential education. This distinction is relevant as internship advisers strive to determine the factors that are present in “good” internships and develop practices to ensure they guide their students towards these opportunities over ones that would be exploitive, or otherwise considered “bad” internships.

It was discovered that while internship advisers worked hard to ensure that the intern’s
learning objectives and outcomes are closely aligned with the internship roles and responsibilities provided by employers, as well as the guidelines for unpaid intern’s roles and responsibilities as set by the US Department of Labor, this was not always attainable. Developing the systems to ensure this consistent alignment, as well as assessment practices to measure the learning outcomes from unpaid internships, was referenced by a number of participants, but identified as resource intensive and difficult to implement. As the value of experiential education becomes more clearly defined and increasingly assessed, more institutional resources should be allocated to this arena (Litchfield, Frawley, & Nettleton, 2010).

With an increasing emphasis on global and 21st century competencies to be gained through higher education, along with increasing pressure from many stakeholders for a ROI from a college degree, experiential education will play a larger role in a student’s academic plan. It was clear that greater cross-fertilization of ideas between practitioners would be fruitful, and possibly generate more common systems for the administration and assessment of experiential education. There was a sense of frustration expressed by internships adviser that they worked in a silo, not only on their own campus, but also across the spectrum of institutions of higher education. The professional organizations, CEIA, WACE, and NEACEFE, all play a role in breaking down these silos and fostering best practices for internship programming, nationally and internationally.

It was affirmed by the participants in this study that the U.S. DOL guidelines for unpaid internships have begun to impact the availability of unpaid internships opportunities, and this was perceived as both a positive outcome as well as a threat to the professional preparation of college students. Many participants voiced the opinion that ALL internships should be paid, regardless of sector, so the move towards more paid internship is perceived as a positive
outcome. The threat comes from the fact that the immediate result will be fewer internship opportunities overall. The general consensus was that companies would likely start paying more of their interns, but would hire fewer interns in any given term. This will mean that this smaller number of opportunities will become more competitive and many college students will have a harder time securing the requisite college internship.

The implications for better professional preparation, and the acquisition of increased research and communication skills to conduct an effective internship search are positive, but will require an increased commitment on the part of students and academic institutions alike. If students need more support and guidance when it comes to securing internships, more resources will need to be allocated for increased coverage and better quality programming with more measurable results. The systems involved with internship programming will need to be tightened up and meet pre-determined criteria, which are tied to institutional learning outcomes and the mission of the college or university. There are implications that there will likely be greater consistency from campus to campus as to how internship programming is managed. This will be a welcome change for many internship advisers, and hopefully will mean their offices will play a more central role in the strategic academic direction of the institution. If stakeholders are seeking a greater ROI from a college education, this research study positions experiential education as a critical vehicle through which to achieve that goal.

Another implication is the expansion of experiential education options and have faculty devise additional ways that students can develop the requisite skills to secure employment and attain self-efficacy (Bandura, 1977) in their chosen discipline. Curriculum that involves project-based learning that includes “real work for real clients,” is such an initiative. Examples of such curriculum are Studio 5 at Simmons College, and the Ad Lab at Boston University. Studio 5 at
Simmons College is a faculty-facilitated, professional communications studio: students doing real work for real clients. This capstone course gives students the advantage of hands-on experience before they begin their professional careers. Students work in collaborative teams to analyze non-profit client communications' needs, identify an appropriate strategy for professional-quality solutions to meet client needs, on budget and on deadline. At Boston University, the country’s largest student-run agency produces cutting-edge work for local and national clients alike. Under the guiding wisdom of advertising industry veterans’ students create agency-caliber work that builds both clients’ businesses and their own portfolios. Service learning and study abroad programs, some of which include internships abroad, are other routes for somewhat similar developmental outcomes.

The literature and the empirical evidence gathered here, however, indicate that the learning outcomes from internships, and other WIL are unique to that domain and will have irreplaceable value as part of a college education for the foreseeable future. With perseverance, creativity, and intelligence, internship advisers will continue to expand and improve upon all areas of internship programming on college campuses worldwide.
References


https://www.naceweb.org/


Fact Sheet #71: Internship Programs Under The Fair Labor Standards Act

This Fact Sheet provides general information to help determine whether interns must be paid the minimum wage and overtime under the Fair Labor Standards Act for the services that they provide to “for-profit” private sector employers.

Background

The Fair Labor Standards Act (FLSA) defines the term “employ” very broadly as including to “suffer or permit to work.” Covered and non-exempt individuals who are “suffered or permitted” to work must be compensated under the law for the services they perform for an employer. Internships in the “for-profit” private sector will most often be viewed as employment, unless the test described below relating to trainees is met. Interns in the “for-profit” private sector who qualify as employees rather than trainees typically must be paid at least the minimum wage and overtime compensation for hours worked over forty in a workweek.

The Test For Unpaid Interns

There are some circumstances under which individuals who participate in “for-profit” private sector internships or training programs may do so without compensation. The Supreme Court has held that the term "suffer or permit to work" cannot be interpreted so as to make a person whose work serves only his or her own interest an employee of another who provides aid or instruction. This may apply to interns who receive training for their own educational benefit if the training meets certain criteria. The determination of whether an internship or training program meets this exclusion depends upon all of the facts and circumstances of each such program.

The following six criteria must be applied when making this determination:

7. The internship, even though it includes actual operation of the facilities of the employer, is similar to training which would be given in an educational environment;

8. The internship experience is for the benefit of the intern;
9. The intern does not displace regular employees, but works under close supervision of existing staff;

10. The employer that provides the training derives no immediate advantage from the activities of the intern; and on occasion its operations may actually be impeded;

11. The intern is not necessarily entitled to a job at the conclusion of the internship; and

12. The employer and the intern understand that the intern is not entitled to wages for the time spent in the internship.

If all of the factors listed above are met, an employment relationship does not exist under the FLSA, and the Act’s minimum wage and overtime provisions do not apply to the intern. This exclusion from the definition of employment is necessarily quite narrow because the FLSA’s definition of “employ” is very broad. Some of the most commonly discussed factors for “for-profit” private sector internship programs are considered below.

(April 2010)

Similar To An Education Environment And The Primary Beneficiary Of The Activity

In general, the more an internship program is structured around a classroom or academic experience as opposed to the employer’s actual operations, the more likely the internship will be viewed as an extension of the individual’s educational experience (this often occurs where a college or university exercises oversight over the internship program and provides educational credit). The more the internship provides the individual with skills that can be used in multiple employment settings, as opposed to skills particular to one employer’s operation, the more likely the intern would be viewed as receiving training. Under these circumstances the intern does not perform the routine work of the business on a regular and recurring basis, and the business is not dependent upon the work of the intern. On the other hand, if the interns are engaged in the operations of the employer or are performing productive work (for example, filing, performing other clerical work, or assisting customers), then the fact that they may be receiving some benefits in the form of a new skill or improved work habits will not exclude them from the FLSA’s minimum wage and overtime requirements because the employer benefits from the interns’ work.

Displacement And Supervision Issues

If an employer uses interns as substitutes for regular workers or to augment its existing workforce during specific time periods, these interns should be paid at least the minimum wage and overtime compensation for hours worked over forty in a workweek. If the employer would have hired additional employees or required existing staff to work additional hours had the interns not performed the work, then the interns will be viewed as employees and entitled compensation under the FLSA. Conversely, if the employer is providing job shadowing opportunities that allow an intern to learn certain functions under the close and constant supervision of regular employees, but the intern performs no or minimal work, the activity is
more likely to be viewed as a bona fide education experience. On the other hand, if the intern receives the same level of supervision as the employer’s regular workforce, this would suggest an employment relationship, rather than training.

**Job Entitlement**

The internship should be of a fixed duration, established prior to the outset of the internship. Further, unpaid internships generally should not be used by the employer as a trial period for individuals seeking employment at the conclusion of the internship period. If an intern is placed with the employer for a trial period with the expectation that he or she will then be hired on a permanent basis, that individual generally would be considered an employee under the FLSA.

**Where to Obtain Additional Information**

This publication is for general information and is not to be considered in the same light as official statements of position contained in the regulations.

For additional information, visit our Wage and Hour Division Website: [http://www.wagehour.dol.gov](http://www.wagehour.dol.gov) and/or call our toll-free information and helpline, available 8 a.m. to 5 p.m. in your time zone, 1-866-4USWAGE (1-866-487-9243).

**U.S. Department of Labor**

Frances Perkins Building 200 Constitution Avenue, NW Washington, DC 20210

1-866-4-USWAGE

TTY: 1-866-487-9243

The FLSA makes a special exception under certain circumstances for individuals who volunteer to perform services for a state or local government agency and for individuals who volunteer for humanitarian purposes for private non-profit food banks. WHD also recognizes an exception for individuals who volunteer their time, freely and without anticipation of compensation for religious, charitable, civic, or humanitarian purposes to non-profit organizations. Unpaid internships in the public sector and for non-profit charitable organizations, where the intern volunteers without expectation of compensation, are generally permissible. WHD is reviewing the need for additional guidance on internships in the public and non-profit sectors.
Appendix B
Transcriber Confidentiality Agreement

Northeastern University
College of Professional Studies

Appendix B
CONFIDENTIALITY AGREEMENT
Transcription Services

Giving and Getting: The Changing Landscape of Unpaid Marketing Communication Internships

I, [Name], transcriptionist, agree to maintain full confidentiality in regards to any and all audiotapes and documentation received from Sarah Burrows related to her doctoral study on unpaid internships. Furthermore, I agree:

1. To hold in strictest confidence the identification of any individual that may be inadvertently revealed during the transcription of audio-taped interviews, or in any associated documents;

2. To not make copies of any audiotapes or computerized files of the transcribed interview texts, unless specifically requested to do so by Sarah Burrows;

3. To store all study-related audiotapes and materials in a safe, secure location as long as they are in my possession;

4. To return all audiotapes and study-related documents to Sarah Burrows in a complete and timely manner.

5. To delete all electronic files containing study-related documents from my computer hard drive and any backup devices.

I am aware that I can be held legally liable for any breach of this confidentiality agreement, and for any harm incurred by individuals if I disclose identifiable information contained in the audiotapes and/or files to which I will have access.

Transcriber’s name (printed) [Name]

Transcriber’s signature [Signature]

Date 26 Oct 2014
Appendix C
Email Recruitment Letter for Participants

Dear (name of internship adviser),

As part of the research I’m conducting for my doctoral dissertation on unpaid marketing communications internships, I would like to understand how your practices and perspectives have changed in the past few years. Because you work in an advisory capacity with student interns, and are a fellow member of the Cooperative Education and Internships Association (CEIA), I would appreciate it very much if you would complete a short survey—and possibly—agree to be interviewed (by phone or in person) about your work.

This is what I’m asking of you:

• Respond to a survey administered online
• and, if you are willing, to participate in an audio-taped follow-up interview that will take approximately one hour. (Conducted via telephone or in-person, depending on your wishes.)

Your participation, whether you simply complete the questionnaire or also agree to be interviewed, will be kept completely confidential. Participation is, of course, entirely voluntary. If you are interested in helping me learn more about how advisers are currently working with students completing unpaid internships, I would love to speak with you. Please contact me at 617-899-6312 or by e-mail at burrows.s@husky.neu.edu.

Sincerely,

Sarah Burrows
Appendix D
Informed Consent With Agreement To Use Pseudonym

Northeastern University, College of Professional Studies
Name of Investigators: Principal Investigator: Dr. Lynda Beltz, Student Researcher: Sarah M. Burrows
Title: Giving and Getting: The Changing Landscape of Unpaid Marketing Communication Internships
Dear Participant,

I have determined that you are actively involved in the supervision of students completing unpaid internships in the marketing communication industry, and believe that you will lend valuable insight into the research I am completing for my Doctoral research.

You have agreed to participate in my research study on unpaid marketing communications internships. You do not have to participate if you do not want to. If you decide to participate, please sign this document, a copy of which will be given to you to keep.

The purpose of this research is to identify the current practices of internship advisers supervising unpaid marketing communication internships. This research aims to discover how internship advisers work has been impacted by the reissuance of the DOL guidelines for unpaid internships.

These are the activities that will you be asked to participate in:

• Respond to a survey administered on line, via survey gizmo, that will be comprised of questions about your experiences working with unpaid marketing communication interns.
• If you are willing, participate in a follow-up interview with the researcher that will be audio taped, and take approximately one hour.
• Submit this signed consent form.

Explanation of Risks:
The researcher will ensure that measures will be taken to ensure the confidentiality of the participants. All participants will be assigned a pseudonym and all recorded files will be kept in a secure location. No one except the student researcher and the principal researcher will have access to these files. The researcher does not believe there are tangible risks associated with participation in this study. If, at any time you feel uncomfortable replying to any of the questions
that are asked, you are free to decline from answering. You are also free to withdraw from the study at any time, without any negative consequences.

There will be no direct benefit to you for taking part in this study. However, the participants will have an opportunity to clarify the practices they have in place to oversee an unpaid internship program. This will be an opportunity to discuss openly some of the successes you have realized in the education of the next generation, and the ways in which you are contributing to industry by coaching interns on the methods that are “industry standards.” If you would like to receive a copy of the findings, you will be privy to other college’s solutions to challenges of sponsoring unpaid internships. You will not be paid for your participation in this study.

The collected surveys will be stored in an encrypted site, and when they are downloaded for analysis, they will be stored on an external hard drive, to be kept in the researchers locked office. Survey participants will be assigned an identifying number, and no original names or names of organizations will be used.

Each interview will be recorded and the electronic recordings will be transferred to a computer as an mp3 file. The electronic recordings of the interviews and all other electronic documents will be downloaded and then saved to the researcher’s personal external hard drive. Interviews will be transcribed by: 1) the student researcher or 2) a professional transcriptionist who will be required to sign a “Transcriber Confidentiality Statement in a Research Study.”

Your participation in this research is completely voluntary. You do not have to participate if you do not want to and you can refuse to answer any of the questions. Even if you begin the study, you may withdraw at any time. If you do not participate or if you decide to withdraw, there will be no negative consequences for you or your organization.

You may contact the student researcher, Sarah Burrows, at any time: 617-899-6312, or burrows.s@husky.neu.edu. In addition, you may contact the principal investigator, Dr. Lynda Beltz at L.Beltz@neu.edu.

If you have any questions about your rights in this research, you may contact:

Nan C. Regina, Director
Northeastern Univ., Human Subject Research Protection
360 Huntington Ave., Mailstop: 960 Renaissance Park, Boston, MA 02115-5000
Phone: 617.373.4588; Fax: 617.373.4595, n.regina@neu.edu. You may call anonymously.
Appendix D*
Informed Consent With Agreement To Use Name

Northeastern University, College of Professional Studies
Name of Investigators: Principal Investigator: Dr. Lynda Beltz, Student Researcher: Sarah M. Burrows

Title: Giving and Getting: The Changing Landscape of Unpaid Marketing Communication Internships

Dear Participant,

I have determined that you are actively involved in the supervision of students completing unpaid internships in the marketing communication industry, and believe that you will lend valuable insight into the research I am completing for my Doctoral research.

You have agreed to participate in my research study on unpaid marketing communications internships. You do not have to participate if you do not want to. If you decide to participate, please sign this document, a copy of which will be given to you to keep.

The purpose of this research is to identify the current practices of internship advisers supervising unpaid marketing communication internships. This research aims to discover how internship advisers work has been impacted by the reissuance of the DOL guidelines for unpaid internships.

These are the activities that will you be asked to participate in:

• Respond to a survey administered online, via survey gizmo, that will be comprised of questions about your experiences working with unpaid marketing communication interns.
• If you are willing, participate in a follow-up interview with the researcher that will be audio taped, and take approximately one hour.
• Submit this signed consent form.

Explanation of Risks:
The researcher does not believe there are tangible risks associated with participation in this study. If, at any time you feel uncomfortable replying to any of the questions that are asked, you are free to decline from answering. You are also free to withdraw from the study at any time, without any negative consequences.

There will be no direct benefit to you for taking part in this study. However, the participants will
have an opportunity to clarify the practices they have in place to oversee an unpaid internship program. This will be an opportunity to discuss openly some of the successes you have realized in the education of the next generation, and the ways in which you are contributing to industry by coaching interns on the methods that are “industry standards.” If you would like to receive a copy of the findings, you will be privy to other college’s solutions to challenges of sponsoring unpaid internships. You will not be paid for your participation in this study.

Each interview will be recorded and the electronic recordings will be transferred to a computer as an mp3 file. The electronic recordings of the interviews and all other electronic documents will be downloaded and then saved to the researcher’s personal external hard drive. Interviews will be transcribed by: 1) the student researcher or 2) a professional transcriptionist who will be required to sign a “Transcriber Confidentiality Statement in a Research Study.”

* I agree to have my name and the name of the Institution where I work be included in the finished thesis.

You may contact the student researcher, Sarah Burrows, at any time: 617-899-6312, or burrows.s@husky.neu.edu. In addition, you may contact the principal investigator, Dr. Lynda Beltz at L.Beltz@neu.edu.

If you have any questions about your rights in this research, you may contact:

Nan C. Regina, Director, Northeastern Univ., Human Subject Research Protection

360 Huntington Ave., Mailstop: 960 Renaissance Park, Boston, MA 02115-5000
Phone: 617.373.4588; Fax: 617.373.4595, n.regina@neu.edu. You may call anonymously.

You must be 18+ years of age to participate in this study, and be legally able to work in the U.S. I agree to take part in this research.

Signature of person agreeing to take part ___________________________ Date

Printed name of person above: __________________________________________

Signature of person who explained the study to the participant above and obtained consent ___________________________ Date

Printed name of person above: __________________________________________
Appendix E
Survey gizmo survey

Burrows internship adviser survey

Page One

1) Please provide your full name*
_________________________________________________

2) Please provide your title and the Department you work in*
_________________________________________________

Validation: %s format expected

3) Please provide your e-mail address*
_________________________________________________

4) Please describe the Type of students served by your office (undergraduate, graduate, non-traditional)*

[ ] undergraduate
[ ] graduate
[ ] non-traditional

5) Please provide an estimate as to the number of student placements per semester that your Department oversees?*

( ) 1-10 Student Placements  ( ) 11-30  ( ) 31-75  ( ) 76-200  ( ) 201-450  ( ) over 450

Validation: Must be percentage

6) Of the interns you advise, approximately what percent of internships are unpaid?*
_________________________________________________

7) Do students earn academic credit?*
8) Is an internship a graduation requirement for marketing communications students?*

( ) yes
( ) no
( ) sometimes

9) Do you communicate the learning objectives for the internship program to the employer? If yes, please comment on how you do this.*

( ) yes
( ) no

Comments

10) Does the employer provide a written description of the role and responsibilities of the intern?*

( ) yes
( ) no
( ) sometimes

Comments:

11) Are the learning objectives for the academic internship reflected in the employer's description of the intern's roles and responsibilities? If yes, please comment on how the learning objectives are incorporated into the intern's job description.

( ) yes
( ) no
( ) sometimes

Comments:

12) Does the employer submit a written performance evaluation of the intern to the academic institution? If yes, please comment on how this is submitted?*

( ) yes
( ) no
Comments:

13) Are the learning objectives for the academic internship reflected in the employer evaluation? If yes, please comment on how the learning objectives are incorporated into the employer evaluation.*

( ) yes
( ) no
( ) sometimes

Comments:

14) Does the intern participate in an academic component that runs concurrently with the fieldwork? Can you comment on if this is a course, a journal, a learning portfolio, deliver an oral presentation?*

( ) yes
( ) no

Comments:

15) Does the intern receive a formal evaluation and/or a grade for the academic components of the internship? If yes, please comment on what components are evaluated.*

( ) yes
( ) no
( ) pass/fail

Comments:

16) From your perspective, the training the intern receives in the field placement is similar to the training they receive in their academic environment.*

( ) strongly agree  ( ) agree  ( ) neutral  ( ) disagree  ( ) strongly disagree

17) From your perspective, the unpaid internship experience is for the benefit to the intern.*

( ) strongly agree  ( ) agree  ( ) neutral  ( ) disagree  ( ) strongly disagree

18) From your perspective, the intern completes work similar to a regular employee.*

( ) strongly agree  ( ) agree  ( ) neutral  ( ) disagree  ( ) strongly disagree
19) From your perspective, the intern performs their work under the close supervision of existing staff.*

( ) strongly agree  ( ) agree  ( ) neutral  ( ) disagree  ( ) strongly disagree

20) From my perspective, the employer derives immediate advantage from the activities of an intern.*

( ) strongly agree  ( ) agree  ( ) neutral  ( ) disagree  ( ) strongly disagree

21) Does the employer communicate clearly that the intern is not entitled to a full-time job upon the completion of the internship?*

( ) yes
( ) no
( ) sometimes

22) Do you believe that the employer and the intern understand that the intern is not entitled to wages for the time spent at the internship?*

( ) yes
( ) no
( ) sometimes

23) From your perspective have the benefits or outcomes from unpaid internships changed in the past five years for students? If yes, please comment on what has changed.*

( ) Yes
( ) No

Comments:

24) From your perspective have the benefits or outcomes from unpaid internships changed in the past five years for employers? If yes, please comment on what has changed.

( ) yes
( ) no

Comments:

25) Has your processes for guidance and supervision of interns changed as a result of these changes? If yes, please comment on what has changed.*

( ) yes
26) Do you think there are fewer or more marketing communication internships opportunities over the past five years? If yes, what factors contribute to this change?*

( ) yes
( ) no

Comments:

27) Do you believe socioeconomic inequities are exacerbated by unpaid internships? If yes, please comment on how unpaid internships impact or are impacted by these inequities.*

( ) yes
( ) no

Comments:

28) If you have any materials that you think clarify or add more detail about your experiences with advising interns, please feel free to upload up to 6 files here.

29) I agree that my responses and any materials that I uploaded may be used for this research.*

[ ] yes
[ ] no
[ ] I would prefer to remain anonymous

Thank You!

Thank you for taking this survey. Your response is very important to us. The researcher will be back in touch about the possibility of a more in-depth interview and to see if you would like the results of this study sent to you.
Appendix F
Interview Questions for Internship Advisers

Thank you for taking the time to complete the previous survey that was sent to you on (date) and for agreeing to participate in this follow-up interview.

Intro self, and review research topic and the purpose of the research.

All answers will kept confidential. This data is to be used to help uncover the drivers of success and challenges of working with students in unpaid internships. In addition, these follow up questions will add a layer of depth to my understanding of the commonalities and differences of how internship advisers’ work with students to facilitate their internships, and if you think that the landscape of unpaid internships has changed. I believe that this research will contribute to a handbook of best practices for unpaid internships in the for profit sector. The results of this research as well as a future handbook will be made available to all research participants.

Adviser’s background and responsibilities:

1. Can you tell me a bit about your background and how long have you been in this position?
2. Talk about and describe your position as an internship adviser and the responsibilities you hold in that role?
3. Are there others in your organizations that have similar roles and responsibilities as you?
4. Can you provide a quick description of the student populations you work with, i.e., low-high performing, socio-economic background, and cultural or ethnic background, professional vs. academic next step?
5. Do you work with undergraduate, graduate, and/or non-traditional students?

Information about internship placements:

6. Approximately what percent of your students are Marketing Communication students?
7. What percent of marketing communication internships are unpaid?
8. Can you paraphrase one or two student’s thoughts or feelings about the value of an unpaid internship?
9. Can you describe the factors that contribute to a particularly successful internship placement? (responsibilities, supervisor, location, schedule, potential for advancement?)
10. Can you describe the factors that contribute to a particularly challenging internship placement? (Responsibilities, supervisor, location, schedule, potential for advancement?)

**Information about Employers:**
11. Tell me about the employers you work with, i.e. the size, the business sector, and location?
12. Describe the pre-placement process you engage in with the employer when placing interns?
13. How has this process changed, if at all, in response to DOL Fact Sheet #71?
14. How do you typically communicate with employers?
15. Do you communicate the learning expectations for the internship to the employer?
16. Do the employers submit a written evaluation of the intern?
17. How do the performance measures being evaluated match up to the learning objectives previously communicated to the employer?
18. If the student is earning academic credit for the internship, is this a class (or something else) that is graded?
19. Is the evaluation used as part of the student’s grade?

**Internship responsibilities in the internship:**
20. From your perspective, what are some of the challenges when for the employer supervising unpaid interns?
21. From your perspective, what are the challenges of responsibilities and expectations of the interns completing unpaid internships?
22. Have the guidelines from the DOL for unpaid internships affected these challenges?
23. What can you, as the academic adviser, do to meet these challenges?

**The landscape of unpaid internships:**
24. Over the past 3-4 years, has your perspective about unpaid internships has changed? If so, can you describe those changes?
25. Over the past 3-4 years have you found that student’s learning outcomes from unpaid internships have changed?
26. Over the past 3-4 years have you found that employers approach or job descriptions for unpaid internships has changed?
27. What do you see in the future in the trends for unpaid internships in the for-profit sector?
28. Do you believe that academic advisers have any responsibilities for oversight of the labor laws impacting unpaid internships?

29. If so, what specific oversight are you actively engaged with?

30. Do you have any personal experience in regards to litigation regarding unpaid internships?

31. Have you seen any changes in the past 3-4 years in regards to legal oversight on the employers end?

32. Do you think that greater regulation of unpaid internships will impact availability of marketing communication opportunities for interns?

33. Do you find equal access to internship opportunities an issue for students from varying socio-economic backgrounds?

34. Do you find the lack of compensation a greater challenge for students from varying socio-economic backgrounds?

35. Do you have any programs that counteract this loss of opportunity?

Conclusions:

36. What would you describe as your greatest rewards in your job overseeing unpaid internships?

37. What would you describe as your greatest challenges in your job overseeing unpaid internships?

38. Any other comments, insights or suggestions about this research topic?

Thank you so much for your time.
158

Appendix G
Survey Results

New Summary Report - 11 November 2014

Survey: Burrows internship adviser survey

1. Please provide your full name

The names of these participants was not included, as 35% of the participants preferred to remain anonymous

2. Please provide your title and the Department you work in

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<td>Assistant Dean, Career Development</td>
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<td>Assistant Director of Experiential Programs, Undergraduate Center for Career Development</td>
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<td>Assistant Professor, Internship Coordinator, School of Visual and Performing Arts</td>
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<td>Career and Recruitment Specialist - Marketing and International Business</td>
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<td>Lecturer, Institute of Communication, Culture, Information &amp; Technology</td>
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<td>Vice President Experiential Education &amp; Career Services</td>
</tr>
<tr>
<td>1</td>
<td>assistant director of experiential education, Experiential Education &amp; Career Services</td>
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<tr>
<td>1</td>
<td>director, career services center</td>
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3. Please provide your e-mail address

This information was not included per request by the participants in the survey
4. Please describe the Type of students served by your office (undergraduate, graduate, non-traditional)

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<tr>
<td>non-traditional</td>
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<td>58.8%</td>
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5. Please provide an estimate as to the number of student placements per semester that your Department oversees?

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<th>Value</th>
<th>Count</th>
<th>Percent</th>
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<td>1-10 Student Placements</td>
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<td>0.0%</td>
</tr>
</tbody>
</table>
### Statistics

<p>| | |</p>
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6. Of the interns you advise, approximately what percent of internships are unpaid?

<table>
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</thead>
<tbody>
<tr>
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<td>1</td>
<td>15%</td>
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<td>30%</td>
</tr>
<tr>
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<td>48%</td>
</tr>
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<td>4</td>
<td>60%</td>
</tr>
<tr>
<td>1</td>
<td>63%</td>
</tr>
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<td>3</td>
<td>65%</td>
</tr>
<tr>
<td>1</td>
<td>70%</td>
</tr>
<tr>
<td>1</td>
<td>75%</td>
</tr>
<tr>
<td>1</td>
<td>90%</td>
</tr>
<tr>
<td>1</td>
<td>98%</td>
</tr>
</tbody>
</table>

This indicates that an average of 65% of internships are unpaid.
7. Do students earn academic credit?

<table>
<thead>
<tr>
<th>Value</th>
<th>Count</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>yes</td>
<td>16</td>
<td>94.1%</td>
</tr>
<tr>
<td>no</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td>sometimes</td>
<td>1</td>
<td>5.9%</td>
</tr>
</tbody>
</table>

8. Is an internship a graduation requirement for marketing communications students?

<table>
<thead>
<tr>
<th>Value</th>
<th>Count</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>no</td>
<td>52.9%</td>
<td></td>
</tr>
<tr>
<td>yes</td>
<td>47.1%</td>
<td></td>
</tr>
</tbody>
</table>
9. Do you communicate the learning objectives for the internship program to the employer? If yes, please comment on how you do this.

<table>
<thead>
<tr>
<th>Value</th>
<th>Count</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>yes</td>
<td>13</td>
<td>76.5%</td>
</tr>
<tr>
<td>no</td>
<td>4</td>
<td>23.5%</td>
</tr>
</tbody>
</table>

Comments

**CountResponse**

1. Employer must sign off on them
2. Faculty advisers are responsible for providing detailed learning objectives to employers. The student is expected to share learning goals. For semester long I communicate with each site.
3. They receive a letter.
4. Through an employer handbook and phone/email communication.
5. Verbally as an employer is coming on to be an "employer partner". Follow-up via email.
6. via email employer factsheet
7. This is communicated to employers before the term they are hosting students, via email, phone conversation, and website. We also provide an employer guide to hosting interns. This is done on initial contact with the employer if they want to post a job opportunity to our job board. It's also communicated to the employer during the job review process when students submit their own opportunities for co-op employment.
8. The student develops their own learning objectives, and then confirms them with the site supervisor. They are then signed, dated, and submitted to the Internship Program.
9. We provide it to the employer to assist with the internship description and we also asked
CountResponse

them to grade the student 2 times during the internship using the learning objectives as measurements.
The employer receives a copy of the student's Internship Agreement which lists specific
learning objectives chosen by the student under the guidance of the student's faculty sponsor.
For students taking an internship class through my department, there is a learning contract. Employers sign it. We follow up with phone calls and emails.
Re Question 6 & 8, I work with Public Relations and general Communications majors, not our Marketing majors. There is a requirement for PR, but not the others. PR & general Comm internships are primarily unpaid (80%) but Marketing internships are primarily paid (10% unpaid). All majors complete a credit application with learning objectives developed by the student with their faculty adviser and shared on the credit application copied to the employer. However, we are not sure how many employers pay attention to that part of the form.

10. Does the employer provide a written description of the role and responsibilities of the intern?

<table>
<thead>
<tr>
<th>Value</th>
<th>Count</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>yes</td>
<td>14</td>
<td>82.4%</td>
</tr>
<tr>
<td>no</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td>sometimes</td>
<td>3</td>
<td>17.7%</td>
</tr>
</tbody>
</table>

Comments

CountResponse

1 Absolutely required or we cannot work with the employer.
1 I don't have any responsibility to ensure this is in place.
1 It's a requirement of the course.
11. Are the learning objectives for the academic internship reflected in the employer's description of the intern's roles and responsibilities? If yes, please comment on how the learning objectives are incorporated into the intern's job description.

<table>
<thead>
<tr>
<th>Value</th>
<th>Count</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
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<td>6</td>
<td>37.5%</td>
</tr>
<tr>
<td>no</td>
<td>2</td>
<td>12.5%</td>
</tr>
<tr>
<td>sometimes</td>
<td>8</td>
<td>50.0%</td>
</tr>
</tbody>
</table>

Comments

**CountResponse**
1  It must state learning beyond the day to day work tasks.
1  We expect the goals to be integrated.
   The learning objectives must be incorporated into the intern's role and responsibilities because the student is receiving academic credit. This is verified before a student can go out on internship. If the job description does not meet the learning objectives, we will reach out to the employer to explain the objectives and assist them in adding them into the description.
There are cases when an employer has not had an intern previously and will develop the job description with the student. In this case, the student may be able to incorporate specific learning objectives into the job description. The majority of internships completed have a job description already compiled. The learning objectives are provided to the employer before the internship description is completed. Once it is received they are used to approve the internship placement.

We focus on many of the learning objectives through class seminars and through the reflective journals. Students go to their work placement 1 day per week.

The employer and student identify the learning objectives on the internship contract and the employer's description of the intern's roles and responsibilities coincide with the established learning objectives.

Every employer is different. We don't require that learning objectives be clearly indicated in the job description. Our job descriptions requirements are that they adequately and accurately describe the responsibilities the student will be performing through the role. Employers are asked to send in the following: Position description, qualifications for the position, learning outcomes of the position.

We need to get better at requiring this. The students are required to create learning objectives as they complete an internship application. The employer, student, school dean and academic adviser all sign this application form.

The learning objectives typically are built from the the employer's description of the roles and responsibilities for the student. Occasionally a faculty member or the internship coordinator will ask an employer to incorporate a desired learning objective into the intern role.

12. Does the employer submit a written performance evaluation of the intern to the academic institution? If yes, please comment on how this is submitted?

<table>
<thead>
<tr>
<th>Value</th>
<th>Count</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>yes</td>
<td>16</td>
<td>94.1%</td>
</tr>
<tr>
<td>Count</td>
<td>Response</td>
<td></td>
</tr>
<tr>
<td>-------</td>
<td>----------</td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>Both a mid-term and final evaluation are completed online.</td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>Electronic submission</td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>It is submitted two times during the term electronically.</td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>It's required for completion of the course credit.</td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>Link is sent to employer, completed and captured in specialized career software (CSO)</td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>Survey Monkey</td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>Electronic student performance mid-term and final evaluations are submitted via an online survey tool.</td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>A performance evaluation form is emailed to the employer about 4 weeks before the end of the semester through our CSO database. It is returned through the database and emailed to faculty.</td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>There are 2 evaluations as part of any work term. There is a mid-term evaluation which is either in person or over the phone with a person who holds a position similar to mine. The final evaluation is a written evaluation that the employer completes online.</td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>Yes, for my class. I send it to the student, who shares it with the employer. We can also send it directly to the employer.</td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>My office sends an evaluation form directly to the internship supervisor for completion.</td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>The form is then returned to my office to be processed and then delivered to the student to complete the internship portfolio.</td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>Each department has created an internship evaluation that they provide to the intern site supervisors. Once completed by the employer, the faculty internship supervisor reviews it.</td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>Most evaluations (including the marketing comm. departments) allow the employer the opportunity to submit a written performance evaluation.</td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>by email - I supply the evaluation form. I also seek verbal feedback through individual phone calls</td>
<td></td>
</tr>
</tbody>
</table>
13. Are the learning objectives for the academic internship reflected in the employer evaluation? If yes, please comment on how the learning objectives are incorporated into the employer evaluation.

<table>
<thead>
<tr>
<th>Value</th>
<th>Count</th>
<th>Percent</th>
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<tbody>
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<tr>
<td>no</td>
<td>7</td>
<td>41.2%</td>
</tr>
<tr>
<td>sometimes</td>
<td>2</td>
<td>11.8%</td>
</tr>
</tbody>
</table>

Comments

**CountResponse**

1. If there are any comments related to learning objectives, it's by coincidence.
1. No, the evaluation matches my course's objectives, not the employers or students.
1. Specific questions have been crafted around the learning objectives.
1. Supervisor is asked to comment on whether goals have been reached.
1. We have a grading scale, which represents most if not all of the learning objectives.
1. rate how the student performed in relation to the learning objectives through specific questions on the form.
1. Occasionally in open-ended survey questions, employers comment on student's learning objectives and the degree to which they were met.
1. Our expected learning competencies are clearly indicated in the final evaluation and the employer rates the student on their abilities in those specific areas by numeric scores and are open to add more detail through comments.
1. This varies by department. Some use open ended questions whereas others use a likert scale on pre-determined criteria that doesn't coincide with the learning objectives. The Communication Department evaluation does not allow for learning objectives to be evaluated in the employer evaluation.
1. The employer is asked to review the student's web portfolio, which documents accomplishment of the learning objectives.
Employers are required to use our mid-term and final evaluation tools where they are evaluating students on their performance; questions tie directly into the internship learning objectives and outcomes.

14. Does the intern participate in an academic component that runs concurrently with the fieldwork? Can you comment on if this is a course, a journal, a learning portfolio, deliver an oral presentation?

<table>
<thead>
<tr>
<th>Value</th>
<th>Count</th>
<th>Percent</th>
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</thead>
<tbody>
<tr>
<td>yes</td>
<td>15</td>
<td>88.2%</td>
</tr>
<tr>
<td>no</td>
<td>2</td>
<td>11.8%</td>
</tr>
</tbody>
</table>

Comments

CountResponse
1 360 evaluations, mid semester and end of semester presentations
1 Communication students do not participate in a course.
1 Course
1 It is a course, mostly online, with several academic assignments.
1 Read a book, write several journals related to internship and career development
1 The student is required to complete a reflective journal that is graded by a faculty member.
1 a 4 credit course, three papers, weekly journal, read one book, resume
1 all of the above, course/class meetings, journal, final report and oral presentation.
Each work term is different as we have 3 mandatory work terms as part of our program.
Each work term is an academic course with a written academic component. The first work term is a portfolio where the student looks at their current skills and where they would like to be when they graduate. They develop a plan for the remainder of their program and outline steps they will take to get them there. In their 2nd work term their academic assignment is an analytical report where they identify a business opportunity within the
Business they are working in. They analyze the opportunity, suggest alternatives and make final recommendations. In the 3rd work term they write a reflective piece where they look at where they are now compared to when they started and develop a plan to execute when they enter the final year of their program.

Semester long students are enrolled in a weekly on campus seminar which includes weekly assignments. 120 hour students write a reflective paper at the end of the internship. Each intern is responsible for an academic component that is based on how many credits they are earning. Typically, an internship is for 3 credits. In this case, the student is responsible for submitting an Internship Portfolio and doing a public presentation of the experience. The portfolio consists of the following: Internship Agreement, resume, job description, internship journal (3 options available), worksite supervisor evaluation, photo and/or video documentation, and a final reflection paper based on learning objectives outlined in the internship agreement.

Students are required to submit bi-weekly reflective assignments while out on internship. They submit these assignments through the University's online course tool. Course is taught seminar style and combines career elements (resume, cover letter, interviewing, job searching), journal reflection, online discussion and a final presentation. Journals and a final evaluation paper. Students are also required to complete an exit interview with me.

Students complete a log and journal. Each department/faculty may have other requirements, such as book reports in public relations (journalism).

15. Does the intern receive a formal evaluation and/or a grade for the academic components of the internship? If yes, please comment on what components are evaluated.

<table>
<thead>
<tr>
<th>Value</th>
<th>Count</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>yes</td>
<td>13</td>
<td>76.5%</td>
</tr>
<tr>
<td>no</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td>pass/fail</td>
<td>4</td>
<td>23.5%</td>
</tr>
</tbody>
</table>
Comments

**CountResponse**

1. ...but it's not an internship...
1. Actually credit/no credit
1. It is S/U
1. Our internships are run as pass/fail.
1. Quality of performance in the class combined with performance at the internship.
1. The intern is graded on the internship portfolio submitted and the public presentation.
1. There is a rubric that is provided to faculty to grade the reflective journal.
1. all of the components that were stated in #14

  Graded A-F. Grading factors vary by faculty. Some grade as though it were pass/fail (A or F). Typically, the employer evaluation counts as only a small part of the grade (unless the student totally screwed up!). Grades are usually based more on the reflective learning that took place as evidenced by the journal or other assignments.

Statement from the Comm. Department website on grading process for internships: Your college faculty sponsor will award a final letter grade, based heavily on your site supervisor’s assessment of your work and on your own reporting. The grade will be based on the evaluation forms provided as part of the internship documentation, your reporting and final report and portfolio and your faculty sponsor’s assessment of your work, professionalism and learning.

1. I am not involved in the grading of the academic assignments as part of the work term. All I know is they are assessed a pass/fail grade.
1. Their ability to make connections between theories/concepts/skills learned in the classroom and how they are applied at the workplace; as well as how well they can articulate their own learning.
1. All assignments including on line assignments for 120 hour students, papers, supervisor evaluation, time sheet.


Students receive a course grade for their internship which is made up of 3 parts: the academic assignment (reflective journaling) which is graded by a faculty adviser, and the mid-term and final performance evaluations, which are completed by the internship employer.
16. From your perspective, the training the intern receives in the field placement is similar to the training they receive in their academic environment.

<table>
<thead>
<tr>
<th>Value</th>
<th>Count</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
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<td>strongly agree</td>
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<td>11.8%</td>
</tr>
<tr>
<td>agree</td>
<td>6</td>
<td>35.3%</td>
</tr>
<tr>
<td>neutral</td>
<td>4</td>
<td>23.5%</td>
</tr>
<tr>
<td>disagree</td>
<td>4</td>
<td>23.5%</td>
</tr>
<tr>
<td>strongly disagree</td>
<td>1</td>
<td>5.9%</td>
</tr>
</tbody>
</table>

**Statistics**

- **Sum**: 47.0
- **Average**: 2.8
- **StdDev**: 1.1
- **Max**: 5.0
17. From your perspective, the unpaid internship experience is for the benefit to the intern.

<table>
<thead>
<tr>
<th>Value</th>
<th>Count</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
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<td>6</td>
<td>35.3%</td>
</tr>
<tr>
<td>agree</td>
<td>6</td>
<td>35.3%</td>
</tr>
<tr>
<td>neutral</td>
<td>5</td>
<td>29.4%</td>
</tr>
<tr>
<td>disagree</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td>strongly disagree</td>
<td>0</td>
<td>0.0%</td>
</tr>
</tbody>
</table>

Statistics

<p>| | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Sum</td>
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<td></td>
</tr>
<tr>
<td>Average</td>
<td>1.9</td>
<td></td>
</tr>
<tr>
<td>StdDev</td>
<td>0.8</td>
<td></td>
</tr>
<tr>
<td>Max</td>
<td>3.0</td>
<td></td>
</tr>
</tbody>
</table>
18. From your perspective, the intern completes work similar to a regular employee.

<table>
<thead>
<tr>
<th>Value</th>
<th>Count</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>strongly agree</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td>agree</td>
<td>9</td>
<td>52.9%</td>
</tr>
<tr>
<td>neutral</td>
<td>6</td>
<td>35.3%</td>
</tr>
<tr>
<td>disagree</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td>strongly disagree</td>
<td>2</td>
<td>11.8%</td>
</tr>
</tbody>
</table>

Statistics

<table>
<thead>
<tr>
<th>Statistics</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Sum</td>
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</tr>
<tr>
<td>Average</td>
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<td>StdDev</td>
<td>1.0</td>
</tr>
<tr>
<td>Max</td>
<td>5.0</td>
</tr>
</tbody>
</table>
19. From your perspective, the intern performs their work under the close supervision of existing staff.

<table>
<thead>
<tr>
<th>Value</th>
<th>Count</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>strongly agree</td>
<td>6</td>
<td>35.3%</td>
</tr>
<tr>
<td>agree</td>
<td>8</td>
<td>47.1%</td>
</tr>
<tr>
<td>neutral</td>
<td>3</td>
<td>17.7%</td>
</tr>
<tr>
<td>disagree</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td>strongly disagree</td>
<td>0</td>
<td>0.0%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Statistics</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Sum</td>
<td>31.0</td>
</tr>
<tr>
<td>Average</td>
<td>1.8</td>
</tr>
<tr>
<td>StdDev</td>
<td>0.7</td>
</tr>
<tr>
<td>Max</td>
<td>3.0</td>
</tr>
</tbody>
</table>
20. From my perspective, the employer derives immediate advantage from the activities of an intern.
21. Does the employer communicate clearly that the intern is not entitled to a full-time job upon the completion of the internship?

<table>
<thead>
<tr>
<th>Value</th>
<th>Count</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>yes</td>
<td>6</td>
<td>35.3%</td>
</tr>
<tr>
<td>no</td>
<td>2</td>
<td>11.8%</td>
</tr>
<tr>
<td>sometimes</td>
<td>9</td>
<td>52.9%</td>
</tr>
</tbody>
</table>

22. Do you believe that the employer and the intern understand that the intern is not entitled to wages for the time spent at the internship?

<table>
<thead>
<tr>
<th>Value</th>
<th>Count</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>yes</td>
<td>14</td>
<td>82.4%</td>
</tr>
<tr>
<td>no</td>
<td>0</td>
<td>0.0%</td>
</tr>
</tbody>
</table>
23. From your perspective have the benefits or outcomes from unpaid internships changed in the past five years for students? If yes, please comment on what has changed.

<table>
<thead>
<tr>
<th>Value</th>
<th>Count</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>8</td>
<td>47.1%</td>
</tr>
<tr>
<td>No</td>
<td>9</td>
<td>52.9%</td>
</tr>
</tbody>
</table>

Comments

**CountResponse**

1. Higher quality experiences and greater participation from students.
1. More educationally based
1. This answer is for Messiah students.
1. We have become much more rigorous in our screening and requirements of unpaid internships.
1. I believe it has improved because we have invested more resources to ensure the experience is worthy of academic credit.
1. Employers and educators are more aware of policies and guidelines, so students have more meaningful experiences.
1. We are much more particular about how students spend their days and how the site lays out expectations.
1. I always tell students to do their own due diligence to lean as much as they can about specific opportunities. I work with some great employers who offer exceptional learning experiences and those students learn a great deal. Then there are other students who take unpaid work as a last resort because a co-op is a requirement in our program and you can tell that this isn't as great an opportunity for students. I think students benefit most from existing programs that have clearly defined and are regular and consistently offered
opportunities. Unfortunately there are more and more employers recognizing they can take advantage of free labor by calling it an internship.
As we follow the internship lawsuits, we are being more careful and selective of internships to offer students. We also have been better educating our employers about their responsibilities in an unpaid intern arrangement. But, we were doing this to some extent beforehand, so I don't believe the benefits or outcomes have changed substantially. Some previously unpaid internships are now paid, which does benefit the student. I think it is important for students to experience what it is like to work within the industry they have chose for a career. The issue is how much work is needed for this level of experience? When does an unpaid internship become free labour? Exploitative practices are affecting our understanding of the academic learning outcomes. I believe they have become a more meaningful experience for the student. more real work is accomplished. It still prevents students who cannot take an unpaid internship from gaining experience in the field. Many low-income students work 20+ hours/week and simply can't afford to not work. Students do gain great experience from internships and they are essential in today's job market, but if more for-profit companies offered compensation, it would be better for everyone involved.

24. From your perspective have the benefits or outcomes from unpaid internships changed in the past five years for employers? If yes, please comment on what has changed.

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<tr>
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<th>Count</th>
<th>Percent</th>
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<tbody>
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</tr>
<tr>
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CountResponse
1 I believe they are giving the interns more hands-on, meaningful work
1 Internship experiences are more important in the hiring and interview process
1 Outcomes: if employers violate the law, there is a great chance of a lawsuit.
1 See response from 24
1 There is much closer scrutiny of what they ask of students.
1 This answer is for employers Messiah works with.
1 We have become much more rigorous in our screening and requirements of unpaid internships.
1 more free resources.
1 I believe students are more prepared for this experience therefore are more skilled than in the past.
1 Slowly, employers are leaning towards offering paid internships for fear of legal action, however, a great deal still offer unpaid internships.
1 I think employers have become more aware and are sensitive to the exploitation of interns, which has encouraged improvement of the experience for the interns. This is slowly occurring in the industry.
1 More and more employers are recognizing this "loop hole" and I think the benefits for employers that can't properly support this kind of a program are huge.

25. Has your processes for guidance and supervision of interns changed as a result of these changes? If yes, please comment on what has changed.

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<tr>
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<th>Count</th>
<th>Percent</th>
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<tr>
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<td>9</td>
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Comments
CountResponse
1  Monitoring and accepting positions while following DOL guidelines.
1  N/A
1  We are more rigorous with employers.
1  Yes, more attentive to the learning. Firmer with employers too.
We show students the list of Ministry guidelines and help them become more informed
about the role of the internship in their learning and when that role is exploited. We make
them conscious of their rights.
As noted above, we are better educating our employers about their responsibilities in an
unpaid internships. These measures include creating an employer expectation list that the
employers must acknowledge when posting an internship and during the credit application
process. We also developed an employer manual.
1  Students are assigned a faculty adviser, internship adviser, and site supervisor while on
internship.
1  I want students to be aware of the DOL requirements and be clear about what they expect
from the internship.

26. Do you think there are fewer or more marketing communication internships
opportunities over the past five years? If yes, what factors contribute to this
change?

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<th>Count</th>
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<tbody>
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</tr>
<tr>
<td>no</td>
<td>7</td>
<td>41.2%</td>
</tr>
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</table>

Comments

CountResponse
1  If so, slightly, based on enrollment and new programs.
1  More, social media explosion.
I think because more organizations are paying, they are taking fewer interns, but I think this is a good thing. It is allowing for a better, safer experience for all parties involved. If your school is sending quality students into the field, the opportunities will remain consistent.

The economy demands that organizations find new ways to communicate who they are and what they offer in a very crowded, marketing intensive arena.

The government and the universities, are making it harder for employers to bring in unpaid interns, and rightfully so.

I think there are more marketing communications position due to the proliferation of small companies and their need for social media marketing.

Some have gone away, but many are still out there. Many of my students in the arts intern at non-profits.

27. Do you believe socioeconomic inequities are exacerbated by unpaid internships? If yes, please comment on how unpaid internships impact or are impacted by these inequities.

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<td>10</td>
<td>58.8%</td>
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<tr>
<td>no</td>
<td>7</td>
<td>41.2%</td>
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Comments

No, research has backed this up. Anecdotally, articles cite differently.
Some big name/brand corporations exploit students who want to add these brand names to their resume. Yes, students who come from a lower socioeconomic background have a disadvantage if accepting an unpaid internship. Many students need to quit or reduce their hours at a job, and usually they are responsible for paying their way through college.

I don't advocate for unpaid internships when there are paid internships available doing the same work. I think students from a lower economic background are more challenged to do an unpaid internship. It is not isolated to just unpaid internship, they are also challenged to do any other experience outside the classroom such as study abroad. Student cannot afford (in every sense of the word) to do long-term, unpaid experiences.

Many of my students will hold on to unrelated part-time jobs in lieu of internships because they need the money (sacrificing the future for the present). At our university, students must receive credit for an unpaid internship. In most cases, the internship will count as a course toward their graduation, a course they would have had to pay for anyway. Also, our school offers the same tuition for 12-18 credits, which allows some students to take an internship without having to pay extra tuition. The inequities do show up in the summer when students often want to do internships, but they can't reach the 12 minimum credits, so they have to pay for credit. Our students are usually paying for their college degree on their own, so it can be a big impact. They must work in addition to doing an internship. It makes some internships impossible. I am seeing more students with registration holds due to non-payment, though this is not necessarily related to internships. This answer should include an option - "sometimes" or "in some circumstances". There are schools, like Messiah, which provide money to help students in the greatest need. Students who have graduated who can't find jobs and accept internship have contributed to the current situation.

Many students have to earn money over the summer to help support themselves, unpaid internships are not an option for them.
29. I agree that my responses and any materials that I uploaded may be used for this research.

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<td>I would prefer to remain anonymous</td>
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Appendix H: IRB Approvals

NOTIFICATION OF IRB ACTION

Date: October 1, 2014  IRB #: CPS14-08-05
Principal Investigator(s): Lynda Beltz
Sarah Burrows
Department: Doctor of Education Program
College of Professional Studies
Address: 20 Belvidere
Northeastern University
Title of Project: Giving and Getting: The Changing Landscape of Unpaid Marketing Communication Internships
Participating Sites: N/A
DHHS Review Category: Expedited #6, #7
Informed Consents: One (1) signed consent form
Monitoring Interval: 12 months

APPROVAL EXPIRATION DATE: SEPTEMBER 30, 2015

Investigator's Responsibilities:
1. The informed consent form bearing the IRB approval stamp must be used when recruiting participants into the study.
2. The investigator must notify IRB immediately of unexpected adverse reactions, or new information that may alter our perception of the benefit-risk ratio.
3. Study procedures and files are subject to audit any time.
4. Any modifications of the protocol or the informed consent as the study progresses must be reviewed and approved by this committee prior to being instituted.
5. Continuing Review Approval for the proposal should be requested at least one month prior to the expiration date above.
6. This approval applies to the protection of human subjects only. It does not apply to any other university approvals that may be necessary.

C. Randall Colvin, Ph.D., Chair
Northeastern University Institutional Review Board

Nan C. Regina, Director
Human Subject Research Protection

Northeastern University FWA #4630
NOTIFICATION OF IRB ACTION

Date: February 3, 2015          IRB#: CPS14-08-05
Principal Investigator(s):   Lynda Beltz
                                      Sarah Burrows
Department:                   Doctor of Education Program
                                      College of Professional Studies
Address:                      20 Belvidere
                                      Northeastern University
Title of Project:             Giving and Getting: The Changing Landscape of
                                      Unpaid Marketing Communication Internships

STATUS: CONCLUDED

The Northeastern University IRB has closed the above mentioned project in accordance with your report in which you indicated the project has concluded as of January 15, 2015. If you would like to resume this project or re-analyze the data for a purpose unrelated to your original approval, you will need to seek approval for the new research.

Please contact The Office of Human Subject Research Protection at 617-373-4588, with any questions or concerns.

[Signature]
Nadine Regina, Director
Human Subject Research Protection

Northeastern University FWA #4630