



**Reaction on Campus to the
Unpaid Internship Controversy**

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Every week it seems I am approached by a reporter on the unpaid internship situation. I feel drawn into the witches' coven of Endor watching poison'd entrails, fenny snake, eye of a newt, and frog toes being thrown into the cauldron only to roil the unpaid brew to a higher boil. The snakes entering the pot are venomous in the form of the Black Swan, Harper Bazaar (thank goodness it wasn't Harpers Bizarre as I was feelin groovy), and Charlie rose court cases. The interesting aspect of two of these cases is that both "interns," looking for experience in a new field of endeavor, have been out of school for several years and engaged in work. The same law firm has filed all the legal motions. These actions only scratch the surface of the efforts to change the landscape of the internship experience; one attempt being to eliminate unpaid work by students.

The recipe for the unpaid brew may have been confounded by a case in the 6th District, U.S. Court of Appeals. *Solis v. Laurelbrook*, decided on April 28, 2011, basically confirmed a lower court finding that the DOL Six Criteria "...is a poor method for determining employee status in a training or educational setting." Using the Laurelbrook school situation specifically, the court gave a general ruling by concluding that "...the proper approach for determining whether an employment relationship exists in the context of a training or learning situation is to ascertain which party derives the primary benefit from the relationship."

Since the courts will be engaged for some time in straightening out the legalities of the unpaid internship, the fate of unpaid internships probably rests upon perceptions played out in the media. And in this venue the challenges appear daunting for colleges and universities. Take for example the recent forum in the NY Times (<http://www.nytimes.com/roomfordebate/2012/02/04/do-unpaid-internships-exploit-college-students/?nl=todaysheadlines&mc=thab1>) on the exploitation of college students in unpaid internships. There is a strong emotional aspect to unpaid internships – students often feel used. But what is striking about this dialogue is that none of the participants have any experience dealing with internships either from college or employer side. Where are the voices from co-op with 25 years in supervising these programs? Where are voices

from the internship community with years of experience managing all types of arrangements between student and employer? Rather we have, again, an older individual who took an unpaid internship with the intention of writing about his experience. No prior experience on campus. No prior experience with other employers – just impressions. He chose to accept available research and opinion that supported his perspective, sometimes at the expensive of research that provided a deeper understanding of the issue but did not reflect his perspective. When colleagues in the internship community are approached about media coverage they shake their heads and dismiss the rhetoric as uninformed. ("Hey, he is off writing about Himalayan languages! Can't be very serious about internships.") Yet, the damage has been done.

As my colleague Bill Morgan pointed out to me, the conclusion to a NY Times op-ed section which is based on a personal experience in an unpaid internship (<http://www.nytimes.com/roomfordebate/2012/02/04/do-unpaid-internships-exploit-college-students/government-should-allow-most-unpaid-internships?scp=5&sq=internship&st=cse>) conveys the future reality of unpaid internship:

In the end, the status quo, while imperfect and inconsistent, may not be that bad. Let the government largely look the other way on unpaid internships, but leave existing prohibitions on the books, so the most egregious violators can be individually sued. This would deter some of the worst abuses while preserving the educational, mutually beneficial unpaid internships that I and so many others have experienced.

WHAT WE TRIED TO DO!

An email invitation was sent to career and internship professionals at approximately 2,000 colleges and universities asking them to participate in a short survey on the actions their institutions have taken thus far in response to the unpaid internship issue. The survey also tapped into their perceptions on various aspects of the controversy. A number of individuals started the survey but did not complete many of the questions. My colleague, who strolled down the hall to my office, commented: "These are excellent questions. However, I do not know the answer as we have 65 internship advisors

and many of them are doing different things depending on their department or college instructions (If they even have instructions).” Probably other potential respondents felt the same way and, unable to speak with one voice, backed out.

We did receive 320 complete surveys that can be used in our attempt to see what currently is happening on campus. The sample is insufficient to generalize to all colleges and universities. Our intention is to use this probe to set the table for a much needed conversation on the unpaid internship situation.

The average size of the undergraduate population that these institutions represent is 5,200 with campuses ranging from just over 1,000 to slightly over 35,000. The following chart provides a profile of those who responded.

Profile of Respondents to College & University Unpaid Internship Survey

Degrees confirmed at your institution:
(could select multiple degrees)

Associates	89	28%
Bachelors	276	87%
Masters	198	62%
PhD & Professional	27	8%

Responsibility of the Respondent:

Career Professional	53%
Internship Advisor in Central Office	32%
Internship Advisor in Department	13%
Academic Advisor	0%
Faculty	2%

Institutional Internship Requirements:

Requires all students to have internship	8%
Majority of departments require; rest optional	10%
Some departments require; most optional	55%
Most student not required; participation optional	27%

UNPAID – IS THE NUMBER SHIFTING?

The exact number of unpaid internships that are being posted or even filled at any given time is essentially unknown. All the numbers bantered about in the media and press are guesses (not even reasonable estimates), at best. We have contributed our estimates to patterns revealed in our 2009 national survey of students where the percentage of internship completers with unpaid internships hovered around 43% (InternBridge research brief on the unpaid internship).

It seems that the media and some professional associations have thrown up their hands and accepted 50-50 split as a reasonably good number. Yet, no entity actually monitors internship activity. We can expect to continue to derive only estimates based on piece meal evidence collected through the occasional national surveys, scattered local and institutional initiatives, and anecdotal stories.

To see how the number of unpaid internships may have changed since the Department of Labor reemphasized the criteria for unpaid internships, known as the six-prong test, in 2009, respondents were asked their perceptions on how the internship postings have changed between the two academic years of 2009-2010 and 2010-2011. Then they were asked to consider the changes for paid and unpaid internships specifically.

The year 2010-2011 triggered a strong rebound in organizations seeking interns. Over 60% reported more postings than a year earlier. This perception was also confirmed in MSU Recruiting Trends 2011-2012 report (CERI, 2011). It appears that postings for unpaid internships were increasing slightly faster than paid internships. Fewer institutions reported a drop in unpaid internships than for paid internships.

	Fewer Postings (%)	Same Number of Postings (%)	More Postings (%)
All Internship Positions	11	28	61
Paid Internships	23	39	38
Unpaid Internships	14	39	46

Table 1. The Perceived Change in Internship Postings Between 2009-2010 and 2010-2011 Academic Years

The biggest triggers to the increased number of internships are a strengthening of the economy and impending retirements. That still does not explain the apparent surge in unpaid internships. Anecdotally, based on thirty years of observing patterns in internship postings, unpaid internships seem to increase during poor economic periods, only to subside once the economy improves. Employers have different reasons for ticking up unpaid positions: (1) the desire to maintain internships programs for preparing future workers but cannot afford to pay them or face criticism from current employees who may be incurring pay cuts or layoffs; (2) temporarily circumvent hiring freezes; and (3) meet their social responsibility for training the next generation of professionals in their field. Other legitimate and quasi-legitimate reasons can be put forth.

Yet, it seems that another type of predatory employer becomes more visible during economic downturns. While it is hard to document, more employers than usual appear to be taking advantage of students. Students need experience to even open the door to full-time employment. Employers know that and offer work they need done, under the guise of internships, but without pay. Some sectors are notorious for the penchant of not paying internships --- advertising, publishing, broadcasting, motion pictures – even in the good times. The supply of students far exceeds the demand or available positions in many of these cases. One means of thinning the population is for those who can work without being paid. The only problem is that in economic downturns the sleaze factor apparently increases across the board, based on the stories of numerous students.

What is more troubling is a trend picked up in the 2007 Recruiting Trends report (CERI, 2007). Three-quarters of responding employers said they offered paid internships while 10 percent offered only unpaid internships. The remaining organizations offered a mix of unpaid and paid. Over the next five years employers expected their mix (both paid and unpaid) internship offerings to increase by 20 percentage points. Employers in Recruiting Trends 2011-2012 (CRI, 2011) were asked whether they were offering paid or unpaid internships. Sixty-six percent were offering paid internships, 18% unpaid, and 16 % a mix of paid and unpaid. The doubling of unpaid internships over the five years reflects, in part, a dramatic increase in the number and types of organizations participating in the survey (increasing from 700 to nearly 4,000) which includes more non-profits and small business who are more likely to offer unpaid internships. The good news is that mixed internships actually shrank over the period.

The disconcerting aspect about organizations offering both unpaid and paid internships is that they have divided the academic world into the elites and the also rans. Organizations are offering paid internships to engineering, computer science, accounting, finance, and other business (not all) and technical students where they have to be competitive in order to attract the best students. But when it comes to marketing, advertising, public relations, human resources, and communications, these companies have a very large pool of candidates with widely varying skills which makes it easy to institute unpaid internships. This situation is like a nuclear bomb waiting to go off. And it nearly did. A recent court case brought by two siblings who each had a summer internship with the same corporation, where one was paid and the other not (yes, the sister was not paid), was settled out of court much to the relief of other corporations following similar practices. The explosion, however, is not far off!

A student who is taking classes, studying (yes, they still do that), working in an unpaid internship, working for wages (minimum) to meet expenses, and may be taking care of other family members has little incentive to complain about an employer who is not paying for legitimate internship

work. Few are going to stay around five to ten years to see the issue resolved in court. Apparently the number of students complaining about their internships has actually dropped. Respondents were asked to indicate whether the number of student complaints about situations at their host sites (not just unpaid) were increasing or decreasing. Few respondents reported an increase (7%).

	Fewer Complaints (%)	Same Number of Complaints (%)	More Complaints (%)
Student Complaints of Internship Hosts	27	66	7

BELIEFS ABOUT PAID AND UNPAID INTERNSHIPS

Many of us hold certain perceptions or beliefs about internships, some based on fact and others based on impressions, anecdotal stories, and gossip. Several basic statements were presented to respondents asking them to agree or to disagree. The factual based statements garnered overwhelming agreement:

- 98% agreed that *students with internship (professional) experience are more employable than students without similar experiences*. The support for this statement infers that students having unpaid internships are better off than students with no experience (85% agree).
- 90% agreed that *students with a greater number of internships are more employable than students with fewer internships*.

Care should be extended in accepting the second statement as true. Research on the payoff from having multiple internships is limited. The evidence does show that students with two internships do much better than students with one. However, students with three internships do not necessarily

do better than those students with two. The marginal returns to three or more internships get smaller and may actually begin to decline (Gardner and Motschenbacher, 1997; Gardner, et al, 1992). At three internships the issue does not appear to be the number of experiences but the time invested in the experience. Several short internships (two experiences of three months, say) can be off-set by a longer internship (one experience of nine months).

The results for statements that are more impression based are not as conclusive as there is diverging agreement. For each statement there are those who agree and those who disagree. An individuals' position is more likely to be based on the environment they work in or proclivities to particular practices. Take someone who has worked in and strongly believes in co-operative education. This person is more likely to agree that paid experiences are always better than unpaid regardless of the situation. On the other hand, take someone who works with students who frequently have internships with non-profit organizations. This person is more likely to disagree with these statements because unpaid internships are seen from a very different perspective.

The statement dealing with employers taking the work of paid interns more seriously than unpaid interns seems a bit ironic. Given the information on employers offering both unpaid and paid internships, why would an organization want to have someone intern who is not going to take their assignment serious. The relationship between pay and serious work is deeply rooted in cultural beliefs that human action is based primarily on financial motivation. Anything worth doing is paid; more meaningful tasks are given to people being paid. This approach ignores intrinsic motivations that may lead someone to engage in an unpaid internship. Nobel Laureate Daniel Kahneman calls this theory-induced blindness (Shirky, 2010) or where rigid "adherence to a set of beliefs about how the world works prevents" someone "from seeing how the world really works" (pg. 99). In an educational setting where the extrinsic and intrinsic motivations and values may differ from the workplace, it may be ill advised to ask why are you working for free? And ask Why are you doing what you are doing? (Shirky, 2010) When applied to internships we have to hypothesize that students in unpaid

internships will take their work just as serious as paid interns because the objective may go beyond positioning one-self to gain a full-time position.

	Disagree (%)	Neither Agree or Disagree (%)	Agree (%)
Paid internships offer higher quality experiences for students compared to unpaid internships	31	27	42
Paid internships are made up of less menial work compared to unpaid internships	37	26	37
Employers take paid internships more seriously than unpaid internships	32	18	50
Students take paid internships more seriously than unpaid internships	22	14	64

Table 2. Statements on Perception of Paid and Unpaid Internships, Percentage Agree or Disagree

What is troubling about the results in this table is that none of these conditions have been seriously researched and most not even researched at all. One study by CERI (Gardner, Chao & Hearst, 2009) has shown that unpaid and paid interns rate their internship outcomes the same and in some cases unpaid rate their experience better than paid internships. Still this research does not deal with the specific statements above. As statements like these enter into the policy and program discussions, they tilt the conversation and agenda. While they are listened too and too often easily accepted, there is no empirical evidence to support (or refute) these positions.

CIRCLING AROUND THE SIX-PRONG TEST

Though a hole has been punched in the six-prong test by the 6th Appeals Court. We still have to consider the test for some time to come as it will take multiple court cases to determine a more realistic and appropriate test. Several statements were presented to respondents on features or aspects surrounding the six-prong test.

- 75% felt that they had a *thorough knowledge of the six-prong test*.
- 50% disagreed with the statement “*Internships which offer neither monetary compensation or college credit are compliant with the law.*” A respondent could probably quibble with this statement as the six-prong test is not a law but rather a ruling by the DOL on a process to determine whether an internship should be paid or not and if a litigant has standing under the Fair Labor Act. However, the 50% who agreed or selected neither agreed or disagreed with this statement need to know that this statement violates the six-prong test. We cannot attribute this to any knowledge of the appeal court decision as it had not been released at the time of the survey. Does make the response to the first statement kind of suspicious.
- 66% disagreed with the statement “*To be in compliance with the law, all internships require monetary compensation.*” Yes, the six-prong test does allow for unpaid experiences.

Repeated calls are made by some observers that the Federal government should step up and clean this mess up. What a Shakespearean tragedy waiting to happen! The Federal government is one of the bigger users of the unpaid internship. I have always wonder how many interns at the DOL are actually paid. A close friend who is on several White House/Congressional tasks forces on employment recently told me of a meeting she attended where the staffers from executive, congressional, and various agencies were sitting around the table discussing accelerating job growth for college graduates when the issue of unpaid internships

came up. Sitting along the wall behind each staffer was an intern; one staffer had the gall to turn around and suggest the intern put their hands over their ears as they may not want to hear this discussion. How callous! And we want them to fix the problem! Obviously respondents did not:

- 62% disagreed that the *Federal government should be involved in monitoring the quality of student internships.*
- 41% agreed that the *DOL should be more active in monitoring the compensation of student interns* (37% disagreed).

So, most colleges and universities would like the Federal government to stay some distance from the internship scene. This message was in evident the minute the DOL reaffirmed the six-prong test. A group of prominent university presidents signed a letter asking the government to stay away from something the universities could handle. Really! We can only ask where these presidents or their institutions were during the period of time when unpaid internships began to increase at such a noticeable rate? Did they ever bother to spank their own faculty who were insisting that internships for academic credit be unpaid (another major abuser of unpaid internships)? Unpaid internships seem like a paltry little gnat that someone can keep quietly under control but not when it can so insidiously impacts students (that is why most institutions exist, right?)

Having the Federal government monitor compensation for student interns would be wonderful. There has never been a federal depository for tracking internship wages, let alone the number of unpaid situations. Very few alternatives exist. For many years Jack Caruso at Wayne State University maintained an extensive database on co-op salaries that was published yearly. Of course, like most good things, budget cuts eliminated that effort. On the internship front information, until recently, has been lacking on even the basic conditions. The most reliable information is not even coming from the Feds or the universities. The Federal government would have to ramp up a significant effort to build, collect and sustain a compensation index. None of the existing data collection avenues of DOL or BLS taps into internships (that

I am aware of). Given priorities in Washington, DC (oil, big pharmaceuticals, health insurance) and their own inability to handle their own unpaid internship situation bodes poorly for this effort, though meritorious, ever getting any traction. It is up to the colleges and universities to find a solution!

PLACING A HOLD ON POSTING UNPAID INTERNSHIPS

NACE (National Association of Colleges and Employers) in its infinite wisdom and to support its partnership with DOL strongly suggested that college and university members not allow unpaid internships to be posted on their job posting systems. Unfortunately this solution only penalizes students and does nothing to solve the underlying problem. (They could have instituted a policy which stated that employers would not be accepted as members to the association if they offered unpaid internships. Oops! That means some investment banks would be a liability, so that is not reasonable.) The real question is how have individual campuses, whether members of NACE or not, addressed the unpaid situation?

It appears that announcements for unpaid internships are still being presented to students. Regardless of the type of organization, the majority of colleges are still posting unpaid internships. There is some resistance to posting unpaid internships for larger companies. This category is worth monitoring over time to see if the number of schools not allowing unpaid posting continues to grow.

	Are Allowed (%)	Are Not Allowed (%)
Large For-profit Organizations	84	16
Small & Mid-size Organizations	89	11
Non-profit Organizations	97	3
Government Agencies	96	4

Table 3. Colleges and Universities Allowing or Not Allowing Postings of Unpaid Internships

The posting of most unpaid internship announcements does not mean that colleges and universities are not practicing due diligence in monitoring the unpaid situation.

- 50% agreed that they have “*actively put measures in place to monitor the quality of unpaid internships.*” Another 20% were not sure because action was up to the individual departments or colleges.
- 65% disagreed with the statement “*My institution believes it is improper to support unpaid internships.*”

In this section of the survey respondents were presented several statements regarding how they interacted with employers and students in regards to unpaid internships. With regards to employers:

- Nearly 50% disagreed with the statement that some “*employers have decided not to post internships at our institution due to concern over the legalities over unpaid*” while 34% reported a neutral position. This figure suggests that the DOL pronouncement has not caused many employers to withdraw from the internship scene. Slightly less than 20% have witnessed employers withdraw their postings. While not a high number it could be devastating if the employers are all concentrated in one sector, such as health.
- 40% have been *approached by employers to learn more about the legal and ethical environments of unpaid internships.* About 16% are not sure if employers have approached their institution since their internship functions are decentralized. The 45% who have not been approached by employers does not mean there is a lapse on the part of employers – some employers have paid internship programs only (unpaid is a mute question), they have their own legal counsel on the issue, or their HR or internship program staff are versed on the issue.

Rather problematic are the opinion statements dealing with the awareness of employers’ concerns over the legalities of paid and unpaid internships. College internship staffs are not

mind-readers and can only react based on their individual interactions with a small number of companies. The results are spread all across the board which means that either we trust employers or we do not. This situation is not tenable in a collaborative situation. Again this is a place that colleges and universities can come together with a common statement on their expectations on the treatment of student interns that organizations can agree in principle to abide.

	Disagree (%)	Neither Agree or Disagree (%)	Agree (%)
Employers who post internships through my institution’s job system are concerned over the future legalities of PAID internships	46	33	21
Employers who post internships through my institution’s job system are concerned over the future legalities of UNPAID internships	36	25	39

Table 4. Are Employers Concerned About the Legalities of Paid and Unpaid Internships

When it comes to working through issues surrounding unpaid internships with students, respondents were much more confident. These individuals seem to be working diligently on behalf of students to inform them of the unpaid situation so that the student can make a reasonable choice on whether to continue pursuing the opportunity.

	Disagree (%)	Neither Agree or Disagree (%)	Agree (%)
My institution discourages students from participating in unpaid internships	77	14	9
My institution educates students about the legal obligations of employers utilizing unpaid internships	28	22	50
My institution educates students about the ethical obligations of employers utilizing unpaid internships.	28	23	49
My office has been approached by students to learn more about the legal and ethical environment of unpaid internships	58	22	20

Table 5. How Institutions Assist Students in Understanding Issues Surrounding Unpaid Internships.

The only area that causes one to pause is the apparent lack of initiative by students to clarify the parameters of the situations they might face in selecting an unpaid internship. Since only 25% of the respondents indicated that students had an internship course available to them, the chances

of most students understanding the implications for the possible options before them will come way too late. Providing “a service” is not a proactive concept; you only come for a service when you need it (often too late, and the repair costs can be steep). Alternative approaches other than a mandatory seminar or class (loved by many adopted by few) need to be explored so that students learn the rules for “dating internships” at the appropriate time.

THE SEVEN PERCENT SOLUTION: CREDIT

Like Sherlock Holmes seven percent solution (sorry I did not opt for the ten percent Simpson solution), apparent remedies can become addictive. In the case of unpaid internships, the addictive solution is to have students take academic credit. This option passes the six prong test and should make the cash drawers of the university jingle but the students pay and pay for many years to come.

Academic credit for internships has been around a long time. Some students are required to take internship credit as part of their degree requirement; others chose to take internship credit as an elective to fill-out degree requirements; and others may take credit to insure that the internship is denoted on their transcripts.

The real calumny is when the academic program requires that students need an internship to complete the requirements for the degree and the faculty insist that the experience be unpaid. In many fields faculty are adamant that a paid experience will undermine the learning that is to be the true motivator in the experience. Despite soaring tuition and straggling student debt, faculty have not relented. It is hard to trace this belief to its source. Many of the disciplines which required professional practice have these experiences closely aligned with and embedded into the curriculum: nursing, k-12 teaching, and law are examples. Plus, faculty (at least one) was (is) responsible for working closely with students will they are in their clinical, externships or student teaching.

No discipline has made the rules about internships/ externships more explicit than the law. The ABA sets standards on student involvement in extern- or internships

that prohibits law students from receiving academic credit for paid work (summarized in Gardner and Bartkus, <http://www.ceri.msu.edu/wp-content/uploads/2010/01/An-Analysis-of-U.S.-Learn-and-Earn-Programs.pdf>).

The ABA, further, requires law students to meet some restrictive poverty requirements before a law school is permitted to grant residence credit for an externship. In addition, the ABA condemns law students who work more than 20 hours a week if they attend law school full-time.

Despite these strict rules, the ABA stands out in what it expects from faculty, law students, and legal mentors during and after the extern or internship (Gardner and Bartkus, p.13):

ABA Requirements for Fieldwork

- A clear statement of fieldwork goals
- Instruction and supervision from faculty willing to devote time and attention needed to supervise the fieldwork properly and mentor participants
- A method for selecting, training, evaluating, and communicating with fieldwork supervisors
- Clearly articulated evaluations of student academic performance from faculty and fieldwork supervisors
- Periodic on-site visits (or the equivalent) from faculty, especially if students receive four or more academic credits (or the equivalent) in one term
- Contemporaneous and regular tutorials seminars or other means of guided reflection where students receive four or more academic credits (or the equivalent).

Cooperative education also has very specific requirements that take a slightly different tack in that these experiences must be paid. The boards of NCCE, the Cooperative Education Association, and the Cooperative Education Division of ASEE approved the following characteristics

that they considered essential for a cooperative-education program:

- Formal recognition by the school as an educational strategy integrating classroom learning and progressive work experiences, with a constructive academic relationship between teaching faculty and co-op faculty or administrators
- Structure for multiple work experiences in formalized sequence with study leading to degree completion of an academic program
- Work experiences, which include both an appropriate learning environment and productive work
- Work experiences related to career or academic goals
- Formal recognition of the co-op experience on student records (e.g., grades, credit hours, part of the degree requirement, notations on the transcript, etc.)
- Pre-employment preparation for students, as well as ongoing advising
- Agreement among the school, the employer, and student on job description and new learning opportunities
- Specified minimum work periods (equivalent in length to an academic term (quarter, semester or trimester). In alternating programs, students work approximately 40 hours/week, full-time during the term. In parallel programs, students work approximately 20 hours/week, part-time during the term.
- Work monitored by the school and supervised by employers
- Official school enrollment during employment
- Recognition as a co-op employee by the employer
- Evaluations by the student, the school, and the employer,

with guided reflection by the student, and remuneration for the work performed

- Provision for employer and school evaluation of quality and relevance of the work experience and curriculum
- Designed to maximize outcomes for students, employers and the school

No available research on internships specifically addresses the contention that being paid undermines the learning outcomes of the experience. If there are doubters, they only need to take a look at the co-operative education literature, not only in the U.S. and Canada, but the work coming out of Australia, New Zealand, and the Scandinavian countries. Co-op has proven a student can learn as well as be paid in professional practice situations; the performance outcomes speak for themselves.

Even more monstrous are departments that hawk the “ultimate” internship experience (just above the third party leeches who do the same thing – “I will get you the perfect internship”). By enrolling for a summer semester worth of credit (say 8 credits) and paying a program fee of several thousand dollars, the student will have an internship tailored made for them in a major metropolis with legions of opportunities. Of course the student cannot be paid for the internship that also includes expenses for transportation, lodging and food. All of which the student must cover. Wow! After taking out a student loan for nearly \$20,000 the student gets placed (through a third party – that is the program fee – who may or may not try to match interests) and seeks their life-time experience.

Naturally there is no guarantee of employment at the other end; but hopefully the student has a portfolio to share with other potential employers back home. There are multiple tragedies here. First, the size of the loan (unless mom and dad are extremely wealthy and freely write a check) is stunning given the finances of the average student. Simply based on the fundamentals of ROI, it is going to take a long time to amortize (repay) the cost of this experience. The student would have been better off, staying closer to home

and building a portfolio through work with companies that may not have the stature of the elites (but then our culture is all about prestige – it sells). Second, the amount of money paid in program fees to a third party could be used by the department to fund an internship agent who connects students to viable options anywhere in the country (even the elite in metropolis USA or France). The returns to the department are huge. Now they have the relationships with companies, agencies, and corporations. By placing their grads with these companies, something an internship agent can easily facilitate, a permanent pathway now exists that future students can walk down.

However, few departments are thinking long term; in the short term costs have been shed, avoided or shifted to students. Third, if nothing else, drop the credits, especially if you are requiring more than one. Instead when the students return have them present their portfolio of work and learning to a knowledge group of faculty and advisors. Award credits based on the quality of the work and gain in learning with a maximum limit on the credits that can be assigned.

Having pontificated long enough, what are the vitals about credit on these campuses?

Credit is not universally viewed as the panacea for compensation. About one-quarter hold a strong opinion that credit can be an appropriate substitute. Another 25% hold that is not a worthy substitute with those respondents in-the-middle saying it is only helpful in a *select* or *some* cases.



	Do Not Believe (%)	Appropriate in a Few Select Cases (%)	Appropriate in Some Cases (%)	Appropriate in Most Cases (%)	Appropriate in All Cases (%)
How strongly do you believe that academic credit is an appropriate substitute for monetary compensation for an internship	25	17	34	19	5

Table 6. The Belief that Credit Can Serve as a Substitute for Monetary Compensation

Among the respondents:

- 90% offer students the opportunity to enroll for academic credit for their internship
- 3 credits are the average awarded for a term of internship (range 1 to 5)

Institutions differ on the number of hours of work expected per credit earned. These results parallel results reported in our recent report on Credit and Non-Credit Bearing Internships. In both cases the hours of work varied widely for the same number of credits.

The disparity is evident. Assuming a student has enrolled for 3 credits for their internship, the student who is expected to work 1, 2 or 3 hours per credit will spend 3, 4 or 6 hours working in his or her internship during the week. At the other end, an expected ten hours per credit would result in 30 hours of work per week. This whole situation is out of whack!

Let's look at it a different way. As a faculty member I teach a three credit course. By the rules on my campus, I have to meet with the class three hours during the week which could be spread over several days or in one contiguous period (actually our classes are 50 minutes blocks – please accept the rounding error). Using that ancient (and out-dated) mystical rule of thumb that for each hour in class students should spend two hours outside of class studying, writing

papers, and tutorials (most research on student studying finds students spend less than this; however, they also count their time differently than faculty). Nevertheless, for my three credit class I expect an additional 6 hours of work per week (the weekend is a bonus). So for my three credit course I expect 9 hours of work per week. Most institutions expect way more than that for a three credit internship. For the student working 30 hours a week; they are working 9 hours per credit outside of class.

This simple mathematical exercise shows why the credit situation is mucked up and why it is a poor if impossible solution to the unpaid situation. Bless institutions like Dickinson College where credit for internships has been eliminated. Students are paying themselves, essentially, for the honor to work themselves to starvation. (Yes, nearly 40% of students in unpaid internships also have another job where they may work 20 to 30 hours per week so they can eat.) It may well be that it is the credit aspect of internships that is tantamount to slavery not simply being unpaid.



Expected Hours Worked Per Week Per Academic Credit	Percent of Respondents
1-2 hours	4
2-3 hours	13
3-4 hours	18
4-5 hours	7
5-6 hours	10
6-7 hours	6
7-8 hours	4
8-9 hours	2
9-10 hours	9
10 or more hours	26

Table 7. Hours expected to Work Per Week Per Credit Earned

**What determines the number of credits
(there is always a way out):**

- Varies depending on the content of the internship 16%
- Varies depending on the amount of time the student spends per week at the internship 37%
- Varies depending on input from faculty 23%
- The number of credits is automatically determined by university policy 28%

How well any of these options works depends on the knowledge the faculty, advisors, or university official brings to the table about learning within the workplace. For many faculty it is dubious they have a clear understanding of the workplace. Wenger (Communities of Practice, 1998, Cambridge University Press) makes a very clear case for the advantages of social learning in the workplace. But, some faculty just do not value the time necessary to understand this dynamic.

Who likely administers the academic credit? Surprisingly 25%

indicate that the career or internship office does on their campuses. Credit control usually lies with the departments or academic units as 75% in this sample attest.

Some additional tidbits:

- 44% provide credit on a pass/fail basis while 56% offer a letter grade
- 64% indicate that students must pay per credit that they receive; 30% have a flat rate tuition system that students can use for internship credit; 6% offer credit at no cost to student
- Only 21% offer a zero credit transcript notation to handle unpaid internships that satisfy employers

Because of the media attention on the unpaid internship, some institutions have instituted programs that provide students alternate forms of compensation to cover expenses. Here is a snapshot of institutions who have adopted these types of programs:

- 21% have alternative compensation arrangements available to students
- The types of compensation include: stipend, fellowships, or grant
- Compensation is based on a competitive essay or need
- The amount of compensation can vary from a few hundred dollars to several thousand with the most common amount being: \$1,000 to \$2,500
- The sources for these are coming from: alumni, donations from for-profit business, and parents

WHERE HAS THIS DISCUSSION BROUGHT US?

Do we have a problem with unpaid internships? Students are between a rock and a hard place as they anticipate transitioning into the workplace. No matter how much co-curricular karma they accumulate, the internship stands as the doorkeeper to gainful employment for the vast majority of students. Thus, they need professional practice whether it is paid and unpaid or for credit or no credit. Unpaid internships simply cannot be yanked from the shelves. The remaining paid opportunities would be numerically inadequate to meet the demand. This imbalance would have pronounced and unintended effects on the structure of the full-time college labor market. To keep unpaid internships in play the burden falls on the student to legitimize them – pay for credit. Our answer is simply yes -- unpaid internships are a problem! A serious one.

- Unpaid work even in the context of learning is unsettling (even though the courts may be leaning this way).
- With college costs so high, working for free while paying for credit is cannibalistic.
- Employers who provide unpaid experiences and yet hold extremely high performance expectations for new hires is duplicitous.

Here are some things that could be done:

- Campaign against the biggest offenders asking them to pay. This campaign can begin with the federal government. Making the public aware of the companies asking for unpaid internships. Nothing like a little community pressure.
- Work with university administrators to eliminate the requirement that internship have to be unpaid if earning credit. If a pay option is available, students should be permitted to be paid and earn credit.
- Administer a Posting Test that ask employers wishing to post an unpaid internship several questions. Pass all

the questions and your internship can be posted with a strong disclaimer that the experience is unpaid and students wishing to consider this opportunity need to consult with their career or internship advisor. Failing a question sends the poster to either an advisor to discuss appropriate modifications to better the learning outcomes before posting.

A national dialogue is needed. It will be hard to embrace any changes even as bizarre as the ones just listed without a national discussion on the all aspects of the unpaid internships. This discussion does not require the federal government, employers, and all the interest groups positioning themselves around this issue. It does require the colleges and universities to come together where faculty, pre-professional advisors, legal staff and key administrators can discuss issues and find the common denominators around unpaid internships. The denominators can form the basis for common language, speaking as one, that institutions can present in a unified front to external parties.

Why a national forum? The disparate responses provided to some of these questions in the survey serve as a starting point. But the more important reason resides in my email in-box. Even before the economy collapsed in 2008, I have been receiving notifications from vendors of the “perfect internship” site for students. The number making fantastic claims has only increased since the recession started. By the end of February 2012 I had already received three in this calendar year alone. Entrepreneurs and their kin invade spaces that they think are broken or underperforming. It is where they think they can make a quick difference as while as a high ROI on their up-front costs. The internship space looks truly broken to an outsider. No natural market exchange mechanism exists; no common voice exists – instead there are literally thousands; no standard expectations or standards are laid out. The list goes on. So the internship function on college campuses seems ripe for plucking. True they fail to understand the complexities involved and the potential pitfalls – but each believes their social media platform is better than anything they have seen on campuses. So they try and will continue trying. One day someone is going to directly hit an administrator or two between their financial eyes and make it appealing to outsource this service.

Before that happens a group needs to step up and host a national dialogue among colleges and universities. But who should host? NACE has already proclaimed a partnership with the DOL and stated they supported Six Prong Criteria. Their suggestion that unpaid internships not be posted on college web sites has alienated many of their members. They would not be able to rally a broad spectrum of institutions to an event. The CEIA represents, in their title, both co-op and internships. However, the leadership and core members are true co-op believers and really have not embraced internship types. They are not very sympathetic to the unpaid experience – it just is not in their blood. Again traction would be slippery among many institutions. NSEE offers hope as it embraces a wide range of experiential activities and has a strong internship group. Their advantage is that they bring more faculty from the unpaid academic majors to the table than the others. The question is whether they have the enthusiasm to host such an event. A final option may rest upon a single campus with a highly visible leader in the internship field, such as Mike True at Messiah College, hosting an event open to all schools. This idea is a seed that needs to grow quickly to attract the right gardener out there.

What is in a name? The biggest problem facing the internships community in the U.S. is simply to understand what the term means. As campuses have mashed together co-op, internship, career service, service learning, and other co-curricular engagement activities the distinctions have become blurred. Internship is often thrown out to mean just about everything related to work—learning or non-learning – work activities. I am guilty of that myself when I substitute “internship” as an all-encompassing activity. The trouble is that this is misleading. Internships on a continuum range from soft fluffy insertions in the workplace to assignments that closely mimic co-ops in their expectations. As result we are moving down a slippery slide which leaves open practices that are really not beneficial to students.

In the U.K. the over arching term is the practicum. Ryan, Toohey, and Hughes (*The Purpose, Value and Structure of the Practicum in Higher Education: A Literature Review*, 1996) stated the term “practicum” is an umbrella that covers a variety of professional work experiences, including

cooperative education, internships, fieldwork, clerkships, and clinical practicums.

Their options include:

- **Apprenticeship:** learning that is primarily experiential and inductive in which a field mentor helps guide the experience; serves as an introduction into occupational groups. Predominates in business and engineering.
- **Academic:** learning takes place in specialized settings under the direction of the field supervisor who provides the context for application. Predominates in medical, nursing and some teaching fields.
- **Growth:** learning is conceived in terms of psychotherapeutic models of personal growth or student development models where reflection is a carried out under guidance of field supervisor. Social Work Counseling, and Higher Education Administration.
- **Articulated:** learning is conceived as developing links between cognitive and experiential learning and between theory and practice. This can be found in a wide range of disciplines.

These divisions are based on how the work – learning connection is conceived. Each practicum is structured around formats based on the length of the experience (thin sandwiches of 2 to 3 weeks to thick sandwiches of six to 12 months, in some cases the entire curriculum). Depending on the type, the experiences are generally paid (apprenticeship and articulated).

In the U.S. definitions abound (see Bartkus and Gardner, *What’s in a Name*, in press). Most definitions share common characteristics similar to those listed for co-op earlier in the paper. However, some definitions are very loose as they try to embrace service learning to co-op structured experiences. And that is where the confusion lies.

A solid definition for a “name” helps set boundaries; establishes common protocols; and provides for exceptions if

warranted. Without a consistent name researchers are using the same language to describe different phenomena. Policy makers who are elusive anyway can produce misleading guidelines due to the lack of boundaries. Employers can squirm through loopholes. Students are simply left out.

In the end, we have little common ground to address the unpaid internship situation. We just do not know enough. Our research is hindered by the lack of a common direction. This common direction requires a national discussion among colleges and universities. The discussion requires a common language. Let's get started.

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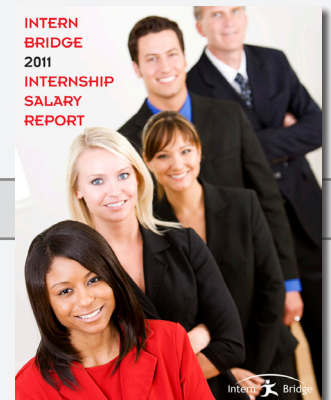
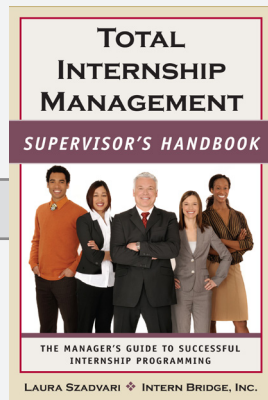
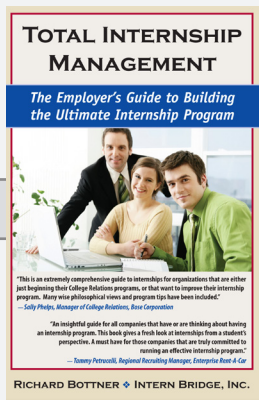
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