

# **Experiential Education: Internships & Cooperative Education**

A Handbook for Practitioners & Administrators



# The Massachusetts Community Colleges

The 15 Community Colleges of the Commonwealth of Massachusetts:

Berkshire Community College Pittsfield, MA

Bristol Community College
Fall River/Attleboro/New Bedford/Taunton, MA

Bunker Hill Community College Boston/ Chelsea, MA

Cape Cod Community College West Barnstable, MA

Greenfield Community College Greenfield, MA

Holyoke Community College Holyoke, MA

Massachusetts Bay Community College Wellesley Hills/ Framingham, MA

Massasoit Community College Brockton/ Canton, MA Middlesex Community College Lowell/ Bedford, MA

Mount Wachusett Community College Gardner/ Leominster/ Devens, MA

Northern Essex Community College Lawrence/ Haverhill, MA

North Shore Community College Danvers/ Lynn/ Beverly, MA

Quinsigamond Community College Worcester/Southbridge/Marlborough, MA

Roxbury Community College Boston, MA

Springfield Technical Community College Springfield, MA

# Massachusetts Community Colleges Experiential Education Committee: Internships and Co-ops

The MCC Experiential Education Committee consists of professionals in the internship, cooperative education, and career services fields across 8 of the 15 Massachusetts Community Colleges.
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# **Acknowledgements**

For several years, internship and cooperative education practitioners from across the Massachusetts Community College system and beyond have asked questions that eventually led us to develop this guide. Questions regarding the different models for internships and cooperative education that exist in Massachusetts and other states, faculty compensation, and internship/cooperative education credit transferability to upper level institutions have been, and continue to be, a major concern for both seasoned and new practitioners when starting or updating internship and cooperative education programs. In an attempt to answer some of these questions and to ultimately standardize the internship and cooperative education process in our state, all Massachusetts community colleges were invited to several meetings and were asked to participate in the collection of information.

Thank you to practitioners across the community colleges in Massachusetts who shared forms, commented on best practices, and answered surveys. Initially, committees were formed to work on legal issues, best practices, and transferability, which led to the formation of one core committee established in January 2010 that collected and organized this valuable information, and became the writing group of this handbook. Although many individuals and organizations contributed to the information included in this handbook, the following acknowledgements go to those individuals who directly contributed to the writing of the document. Writing members included John Cornman of Berkshire Community College, Margaret Curro of Bristol Community College, Sharon Schaff of Bunker Hill Community College, Julie Komack of Massachusetts Bay Community College, Patricia Brewerton of Mount Wachusett Community College, Faith Wong of Quinsigamond Community College, and Jennie Thrash of Roxbury Community College, under the capable leadership of Andrea Picard of Holyoke Community College.

Others who contributed to the writing of this document include, Janet Nepkie Ph.D., SUNY Distinguished Service Professor of the State University of New York at Oneonta. Under Dr. Nepkie's leadership, the SUNY Faculty Senate Undergraduate Programs and Policies Committee developed a handbook entitled Internships: A Guide for Planning, Implementation, and Assessment. We are grateful to Dr. Nepkie, for with her permission we have drawn heavily on the framework and resources of SUNY's document to guide the construction of a handbook for the Massachusetts Community Colleges. Also, in developing our handbook, the Experiential Education Committee has called on the expertise of national and regional organizations such as the National Association of Colleges and Employers, the National Society for Experiential Education, the New England Association of Cooperative Education and Field Experience, and the Council for the Advancement of Standards in Higher Education.

The encouragement and support of William Hart, Executive Director of the Massachusetts Community Colleges Executive Office, has been sincerely appreciated throughout this endeavor. A special thank you is also extended to Kenneth A. Tashjy, General Counsel for the Massachusetts Community Colleges, for his invaluable assistance in answering many significant legal questions and consulting in the development of the MCC Legal Documents and Advisories produced here. We also recognize Francesca Purcell, Associate Commissioner for Academic and P-16 Policy, of the Massachusetts Board of Higher Education, for her assistance with questions and recommendations concerning transfer to the University of Massachusetts and within the Massachusetts community college systems.

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# **Foreword**

Over the past two years, Massachusetts Community Colleges internship, cooperative education, and career service professionals have worked together in an effort to develop formal guidelines for experiential education, with a focus on internship and cooperative education (co-op) programs. Experiential education programs are recognized as a valuable component of a student's educational experience and these programs can serve as a bridge between academics and future employment opportunities. As a result of collaborative meetings and sharing best practices among the 15 Massachusetts Community Colleges, the MCC Experiential Education: Internships and Cooperative Education, A Handbook for Practitioners and Administrators was drafted in early 2011.

This handbook outlines "best practices, success factors, federal regulations, and legal implications critical for practitioners and program administrators to understand in designing, implementing, supervising, and assessing internships and co-ops on each of the Commonwealth's community college campuses." Based on input from the Massachusetts Community Colleges Executive Office, the Massachusetts Department of Higher Education, and recommendations set forth by the Council for Advancement of Standards in Higher Education, this document provides an in-depth analysis of standards, pedagogy, planning, implementation steps, anticipated learning outcomes, and legal issues surrounding the development and implementation of experiential education programs. The Handbook also contains standardized forms, processes and procedures that can be utilized across the community college campuses.

We, the Presidents of these respective 15 Massachusetts Community Colleges, endorse and support the principles and processes this handbook outlines. We encourage each campus to implement the spirit of the *Handbook*, and if not already doing so, utilize the components that will enhance their respective cooperative education and internship programs and promote the consistent adherence to the standards set forth within.

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# Introduction

Experiential education is a unique and rewarding college experience for many students. Several degree and certificate programs across the Commonwealth's community college campuses include internships or cooperation education (co-ops) as a key component of their experiential education programming, either as an elective or a required course in the curriculum.

The purpose of the 2011 Massachusetts Community Colleges Experiential Education: Internships and Cooperative Education, A Handbook for Practitioners and Administrators (the Handbook) is to outline best practices, success factors, federal regulations, and legal implications critical for practitioners and program administrators to understand in designing, implementing, supervising, and assessing internships and co-ops on their respective campuses. Recognizing that each of the Massachusetts Community Colleges has unique characteristics, histories, goals, and centralized or de-centralized models for the administration of their experiential education programs, we strongly recommend that individual programs across the Massachusetts Community College system integrate the elements outlined in this handbook.

#### Mission

According to the Council for the Advancement of Standards in Higher Education (CAS), the "primary mission of internship [and co-op] programs is to engage students in planned, educationally-related work and learning experiences that integrate knowledge and theory with practical application and skill development in a professional setting" (Council for the Advancement of Standards in Higher Education [CAS], 2006, p.4). CAS pointedly recommends that successful experiential education programs must also operate as an integral part of each institution's overall mission and goals.

#### Scope

Experiential education opportunities discussed in this publication will be limited to those experiences for which a student earns academic credit in an agreed-upon, short-term, supervised work experience related to a student's field of study. On individual campuses that make up the Massachusetts Community College system, these experiences are termed as either internship or cooperative education (co-op). These experiences can be full-time or part-time, on or off campus, and paid or unpaid. Credit is awarded to the student by the college upon successful completion of the experience and all academic requirements.

Content in the *Handbook* does not intend to address practicums, clinicals, or other required fieldwork experiences leading to professional licensure or certification. Also, for the purposes of this handbook, the experiential education opportunities described herein are distinct from volunteer community service or classroom-based service learning opportunities.

#### Value

For the student, an internship or co-op offers valuable real-world experience in their desired career field, gaining hands-on skills development under the guidance of employer and faculty mentors. Classroom knowledge comes alive as the student has the opportunity to explore and reflect on academic theory in practice, in a dynamic organizational environment. Internships and co-ops also offer students the ability to test-drive a career before continuing down a particular path of further education. In addition, the experience will help students build a valuable network of professional contacts as well as bolster their resume towards gainful employment. Attention to all such aspects of a student's lifelong learning, career, and educational development should be considered in the design and implementation of academic internship programs (State University of New York [SUNY] University Faculty Senate, 2007, p.1). New graduates who have participated in an internship experience are also more likely to receive a job offer than their peers who did not (NACE, 2010).



For the faculty, internship or co-op supervision may offer new community partner linkages and opportunities to keep abreast of the most current trends and emerging needs of the professional work world. Broad exposure to the operating practices of many different organizations can be gleaned through one class of students placed throughout the community. Faculty can gain valuable information to better prepare their future students and aid in the redesign of course or program curricula.

For the college, internships and co-ops offer a robust teaching and learning vehicle to promote increased academic, career, and personal development opportunities for the success of the students we serve. Internships and co-ops also contribute to strengthen the presence of the college in the community through building community partnerships, spurring recognition of various academic departments, and establishing momentum for a stronger workforce development, recruiting pipelines or re-training needs.

For the sponsoring organization, an internship or co-op offers opportunities for real work projects to be completed while investing directly in their local, future talent pool. Organizations gain access to students early on in their educational careers, capturing their attention before other competitors have this opportunity. While sponsoring, the organizations invest training resources towards the student's development. These internships and co-op are a strategic, high-value investment that can be significantly less than the high cost of unsuccessful new hires. Student interns can also add value by expanding workforce diversity, creating an influx of fresh ideas on existing systems, and broadening leadership and supervisory professional development opportunities for staff. The internship or co-op can foster useful long-term relationships for the sponsoring organization, the student, and the academic institution.

# **High-Impact Educational Practice**

The American Association of Colleges and Universities (AACU) has listed internship and co-op programs as a targeted category of ten "High-Impact Educational Practices" identified in a 2008 report through the Liberal Education and America's Promise (LEAP) initiative. Kuh (2008) writes that these ten "practices have been widely tested and have been shown to be beneficial for college students from many backgrounds. These practices take many different forms, depending on learner characteristics and on institutional priorities and contexts." He adds that "on almost all campuses, utilization of active learning practices is unsystematic, to the detriment of student learning" (p.1).

Internships and co-op programs are a proven model of teaching excellence. However, a comprehensive, coordinated approach to the institutional management of these programs is an essential ingredient towards achieving maximum student engagement, growth, retention, and success.



# **Definitions**

Experiential education internship/co-op opportunities are the formal integration of a student's academic study and active engagement in an experience that provides real learning for career and educational development.

Several professional and academic organizations provide definitions of experiential education, internships/cooperative education, including the National Association of Colleges and Employers (NACE), the Cooperative Education and Internship Association (CEIA), and the Council for the Advancement of Standards in Higher Education (CAS).

#### **Experiential Education:\***

A systematic approach to applied learning whereby a student engages in professional, productive learning activities. Experiential Education is a process through which a learner constructs knowledge (CAS, 2009). Experiential Education refers to learning activities that involve the learner in the process of active engagement with, and critical reflection about, phenomena being studied (NSEE, 1997).

# Cooperative Education (Co-op):\*

Cooperative education provides students with multiple periods of work in which the work is related to the student's major or career goal. The typical program plan is for a student to alternate terms of full-time classroom study with terms of full-time, discipline-related employment. Since program participation involves multiple work terms, the typical participant will work three or four work terms, thus gaining a year or more of career-related work experience before graduation. Virtually all co-op positions are paid and the vast majority involves some form of academic credit (NACE).

#### Internships:\*

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 (NACE, 2011, p.2).

NACE came out with the new, above definition of internships in a July 2011 Position Statement to its membership and the U.S. Department of Labor, in response to the considerable growth of unpaid internships and recognition of this as a "topic of discussion and concern for the past two years" (p.1). In its broadest definition, NACE still recognizes on their main website that "internships can be paid or unpaid and the student may or may not receive academic credit for performing the internship" (NACE).

\*In practice, individual employer organizations and academic institutions adopt terminology that identifies with various aspects of these definitions, and as such may not be consistent with the definitions provided above. Further incongruities transpire across the high school, community college, baccalaureate and graduate college levels. It is the work of practitioners in these professional bodies in the coming years to help facilitate a more clear understanding of the various field terminologies amongst employers and educational practitioners nationally. However, it is prudent to include these definitions here as a basic foundation.

Key places for terminology substitutions are delineated by italicized text in parentheses. The following is a general list for sample substitutions that may be used in accordance to individual institutions.

(Internship) - Co-op, Cooperative Education, etc.

(Faculty) - Faculty Advisor, Faculty Mentor, Co-op Faculty, Co-op Advisor, etc.

(Coordinator) - Internship Coordinator, Co-op Coordinator, Co-op Placement Coordinator, etc.



# Standards: Council for the Advancement of Standards in Higher Education

The establishment of professional standards for experiential education programs in the U.S. began with the National Society of Experiential Education (NSEE)'s Eight Principles of Good Practice in 1998 (explored further in Part I. Pedagogy: Section 2). In 2006, the Council for the Advancement of Standards in Higher Education (CAS) integrated NSEE's foundational principles into their comprehensive document of benchmarks Standards for Internship Programs, later reviewed in 2008. CAS is a consortium of nearly 40 higher education and professional associations established in a collective effort to provide enhanced credibility within higher education by establishing standards that are inclusive of the values and interests of member professional groups and the areas they promote, such as NSEE, and that foster and enhance student learning, development, and achievement at institutions of higher education.

In its Contextual Statement Preface to the Role of Internship Programs and Standards (2006), CAS recognizes that internships have grown to be an "integral part of a college education," as a result of movements since the 1960's to make the curriculum more relevant to a career orientation and to better apply the knowledge of theoretical disciplines to solve societal problems (p.1). The Statement particularly underscores the importance of integrating these experiences into the academic functioning:

Of considerable significance is the intent of CAS to include the notion that an internship or co-op program is not the sole purview of a career center or off-campus programs office. Academic departments that grant credit for internships have faculty designated to oversee internships for the first time, a major statement is made that defines internships and co-ops within the context of an academic institution of higher education.

Although professionalism in Experiential Education has made significant leaps in the past decade, the establishment of these standards is an important milestone within the field. It emphasizes that careful thought, planning, administration, implementation, and feedback are important in the entire learning process and that sufficient resources should be available to accomplish the established goals of the learning experience. Also, this professionalism must exist within both the academic and the co-curricular areas of the institution... administrators and faculties have a special obligation to ensure not only the high quality of the learning environment for their students but also to assess the risk management and safety of students in these settings (p.2).

The CAS standards for internship and co-operative education programs establish a set of benchmarks useful in ascertaining what a quality college internship program should resemble as it meets student academic, career, and personal goals. Benchmarks help determine whether an activity is academic credit-worthy, enhances the student's overall educational experience, and helps assess risk management to protect the student, faculty, staff member or institution, and outline credibility and accountability for the site sponsor (CAS, 2009, p.277). Nationally recognized standards are important to consider for quality development, improvements, and accreditation of internship and cooperative education programs, including NEASC self-studies.



The table below summarizes the fourteen defined CAS Standards for internship and cooperative education programs. (For the complete document please refer to Appendix F).

# **CAS General Standards**

- 1. MISSION Programs and services must develop, disseminate, implement, and regularly review their mission.
- 2. PROGRAM The formal education of students, consisting of the curriculum and the co-curriculum, must promote student learning and development outcomes that are purposeful and holistic and that prepare students for satisfying and productive lifestyles, work, and civic participation.
- 3. LEADERSHIP Effective and ethical leadership is essential to the success of all organizations.
- 4. HUMAN RESOURCES Programs and services must be staffed adequately by individuals qualified to accomplish the mission and goals.
- 5. ETHICS Staff must adhere to the highest principles of ethical behavior and ensure privacy and confidentiality.
- 6. LEGAL RESPONSIBILITIES Staff members must be knowledgeable about and responsive to laws and regulations that relate to their respective responsibilities and that may pose legal obligations, limitations, or ramifications for the institution as a whole.
- 7. EQUITY and ACCESS Programs and services must be provided on a fair, equitable, and non-discriminatory basis in accordance with institutional policies and with all applicable state/provincial and federal statutes and regulations.
- 8. DIVERSITY Within the context of each institution's unique mission, diversity enriches the community and enhances the collegiate experience for all; therefore, programs and services must create and nurture environments that are welcoming to and bring together persons of diverse backgrounds.
- ORGANIZATION and MANAGEMENT To promote student learning and development outcomes, programs and services must be structured purposefully and managed effectively to achieve stated goals.
- 10. CAMPUS and EXTERNAL RELATIONS- Programs and services must reach out to relevant individuals, campus offices, and external agencies.
- 11. FINANCIAL RESOURCES Programs and services must have adequate funding to accomplish their mission and goals.
- 12. TECHNOLOGY Programs and services must have adequate technology to support their mission.
- 13. FACILITIES and EQUIPMENT Programs and services must have adequate, accessible, suitably located facilities and equipment to support their mission and goals.
- 14. ASSESSMENT and EVALUATION Programs and services must establish systematic plans and processes to meet internal and external accountability expectations with regard to program as well as student learning and development outcomes.



# Part I: Pedagogy of Experiential Education

Early experiential education theorists were considered "activists" in their time, opposing the existing models of traditional public and private education. Since the work of these early theorists, a variety of experiential education fields have exploded onto the scene and have become widely valued as an integral part of our modern educational systems. This includes such programs as cooperative education, outdoor education, internships, service learning, and study abroad programs.

Traditional, classroom-based education enables a critical foundation for experiential learning activities to take place. Experiential education is cultivated through concrete activities and practice offsite that engage the student as an active participant and requires critical reflection. It also grounds knowledge in real life experience. In moving away from passive teaching tools such as lectures or discussions of abstract theory, the student is encouraged to take more ownership in his or her own learning. Experiential education is process-driven, and becomes learner-centered as constructed by the individual, rather than content-driven as taught through a professor or a text. In an experiential education classroom the teacher is no longer, as it is said colloquially, the "sage on the stage" but rather the "guide by the side" along the student's pathway of learning.

As pedagogy, experiential education equalizes the classroom for students by valuing the fact that all have pre-existing experiences that can contribute to new knowledge. Through a continual process of reflection and dialogue, students are learning from experience as well as experiencing their learning. Lifelong learning is embraced as critical reflection draws out what is significant or internally meaningful to the student learner. It is this series of meaningful, significant learning moments that strongly shape each student's personal and professional development, and offer rich opportunities to emphasize the integration of academic ideas into practical and civic realities.

# 1. History, Theory, and Research

In 1997, the National Society for Experiential Education (NSEE) undertook the task of compiling the history and foundations of experiential education as a starting point to discuss the vast assumptions brought together in defining experiential education. Published as Foundations of Experiential Education, their work established a significant common platform and framework of core fundamentals as best understood at the time by researchers and practitioners in the field. NSEE hoped this effort would "suggest conceptual frameworks and language which can be adapted for diverse audiences: students, parents, teachers, professors, school and college administrators, student affairs professionals, business and community partners, state and federal legislators, and policy makers" (NSEE Foundations Document Committee, 1997, p. 3). In keeping with this mission, we summarize several key contributors to the field of experiential education, as recognized in the 1997 Foundations document below:

# **Theoretical Foundations**

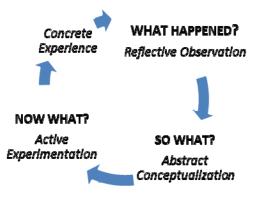
**John Dewey** in the 1930s was one of the earliest experiential education thinkers who critiqued traditional teaching techniques that "assume the ignorance of the learner and the wisdom and authority of the teacher" in favor of a "holistic and integrative [approach] based on the process of making meaning out of experience" (NSEE Foundations Document Committee, 1997, p. 3).

However, Dewey recognized that not all of a learner's experiences would equal knowledge gained or real learning. He argued that for an experience to count towards benefitting new learning, it must illustrate growth intellectually and morally, it must benefit the larger community, it must instill an eagerness for more, be that a greater curiosity in a subject, more initiative, deeper desire, or directed purpose, and it must engage citizens in association with one another.



**Paulo Freire** later contended that traditional classroom education was dismissive of the vast learning that takes place in the crucible of life. He relegated traditional teaching techniques as operating under an oppressive "banking system concept" where students are perceived merely as empty bank accounts, waiting to store and file information deposits from their teachers. The use of real life examples would allow students to move beyond passive learning receptacles and equip them for a natural flow of learning from one experience to the next, "coming to see the world not as a static reality but as a reality in process, in transformation" (NSEE Foundations Document Committee, 1997, p. 4). Classrooms may be controlled environments, but not so the real world.

**David Kolb** built upon this and proposed that "Learning is the process whereby knowledge is created through the transformation of experience" (NSEE Foundations Document Committee, 1997, p. 4). To help educators, Kolb proposed a framework to organize experience so that meaning and knowledge could be made through a cycle of explaining what happened, then analyzing the experience for what it means and then reflecting upon how this learning would shape future actions. The learner is empowered to decide for himself what the valid learning points are and what is next acted upon. This three-part reflective cycle of asking, What Happened? So What? And Now What? has become widely known as Kolb's Learning Cycle, developed in 1975 together with Roger Fry (King, 2009, p. 7).



# Research on Transformative Learning Experiences

**Daniel Goleman**, jumping to modern day neurological research, supports the validity of earlier experiential education theorists in his physiological documentation of the human brain and its mass network of myriads of neuron connections. As learning takes place, stronger patterns of electrical connections become established on neural super-highways. His work illustrates that prior experiences clearly impact how one responds to or learns from new experiences. As a learner processes emotional intelligence and integrates new understanding from their mind-soul-body connection, new neural patterns form apart from their default neural pathways. Citing this proof, the NSEE Foundations Committee argues that "testing ideas in action, experiential education is among the most powerful means available for connecting new learning to existing neurological networks" (NSEE Foundations Document Committee, 1997, p.5).

Significant evidence of the transformative learning power of experiential education when embedded in critical reflection practices is witnessed through the positive outcomes that these community-based learning programs have produced in colleges and universities across the country. One significant study, The Evaluation of Experiential Learning Project in the late 1970s surveyed thirty experiential education programs throughout the United States. Researchers Daniel Conrad and Diane Hedin of the University of Minnesota (1982) found that "Students in experiential programs tended to increase significantly... [in] tests of moral reasoning, self-esteem, social and personal responsibility, attitudes toward adults and others, career exploration, and empathy/complexity of thought" (p. 74).



# 2. Key Success Factors

The National Society for Experiential Education (NSEE) actively participated in the development of the fourteen approved CAS Professional Standards for Higher Education for experiential education programs, including cooperative education and internships as published in the 6<sup>th</sup> and 7<sup>th</sup> editions (CAS, 2009).

NSEE keyed in on eight success factors that all experiential education activities should have: Intention, Preparedness and Planning, Authenticity, Reflection, Orientation and Training, Monitoring and Continuous Improvement, Assessment and Evaluation, and Acknowledgment (NSEE, 1998).

The following page outlines NSEE's eight success factors in greater detail. These factors summarize the essence of a well thought out experiential education program.



# **NSEE Principles of Good Practice**

**INTENTION-** All parties must be clear from the outset why experience is the chosen approach to the learning that is to take place and to the knowledge that will be demonstrated, applied or result from it. Intention represents the purposefulness that enables experience to become knowledge and, as such, is deeper than the goals, objectives, and activities that define the experience.

**PREPAREDNESS & PLANNING-** Participants must ensure that they enter the experience with sufficient foundation to support a successful experience. They must also focus from the earliest stages of the experience/program on the identified intentions, adhering to them as goals, objectives and activities are defined. The resulting plan should include those intentions and be referred to on a regular basis by all parties. At the same time, it should be flexible enough to allow for adaptations as the experience unfolds.

**AUTHENTICITY-** The experience must have a real world context and/or be useful and meaningful in reference to an applied setting or situation. This means that is should be designed in concert with those who will be affected by or use it, or in response to a real situation.

**REFLECTION-** Reflection is the element that transforms simple experience to a learning experience. For knowledge to be discovered and internalized the learner must test assumptions and hypotheses about the outcomes of decisions and actions taken, then weigh the outcomes against past learning and future implications. This reflective process is integral to all phases of experiential learning, from identifying intention and choosing the experience, to considering preconceptions and observing how they change as the experience unfolds. Reflection is also an essential tool for adjusting the experience and measuring outcomes.

**ORIENTATION & TRAINING-** For the full value of the experience to be accessible to both the learner and the learning facilitator(s), and to any involved organizational partners, it is essential that they be prepared with important background information about each other and about the context and environment in which the experience will operate. Once that baseline of knowledge is addressed, ongoing structured development opportunities should also be included to expand the learner's appreciation of the context and skill requirements of her/his work.

**MONITORING & CONTINUOUS IMPROVEMENT-** Any learning activity will be dynamic and changing, and the parties involved all bear responsibility for ensuring that the experience, as it is in process, continues to provide the richest learning possible, while affirming the learner. It is important that there be a feedback loop related to learning intentions and quality objectives and that the structure of the experience be sufficiently flexible to permit change in response to what that feedback suggests. While reflection provides input for new hypotheses and knowledge based in documented experience, other strategies for observing progress against intentions and objectives should also be in place. Monitoring and continuous improvement represent the formative evaluation tools.

**ASSESSMENT & EVALUATION-** Outcomes and processes should be systematically documented with regard to initial intentions and quality outcomes. Assessment is a means to develop and refine the specific learning goals and quality objectives identified during the planning stages of the experience, while evaluation provides comprehensive data about the experiential process as a whole and whether it has met the intentions which suggested it.

**ACKNOWLEDGEMENT-** Recognition of learning and impact occur throughout the experience by way of the reflective and monitoring processes and through reporting, documentation and sharing of accomplishments. All parties to the experience should be included in the recognition of progress and accomplishment. Culminating documentation and celebration of learning and impact help provide closure and sustainability to the experience.



# 3. Reflection

Reflection is a critical thinking process that enables students to connect experience with knowledge. It plays a crucial role in experiential education and when done regularly, can help foster successful habits for lifelong learning. Professors and researchers consistently report that reflection powerfully affects the outcomes of students' experiences (Eyler, J., Giles, Jr., D.E. and Gray, C.J., 2000). Without reflection, which is the "turning [of] a subject over in the mind and giving it serious and consecutive consideration" as defined by Dewey in 1910, and "monitoring one's own reactions and thinking processes" as defined by Eyler and Giles in 1999, an experience is merely an experience (King, 2009, p.14).

Educational practitioners assigning and facilitating reflection activities sometimes find critical reflection a difficult process of trial and error. Educators may be more familiar with the critical thinking tool, Bloom's Taxonomy of Cognitive Hierarchies. It applies to reflection in that by starting with knowledge based questions and moving through a fuller comprehension, application, analysis, synthesis and evaluation, one is able to deepen their critical thinking abilities and achieve fuller learning (King, 2009, p.4).



Figure 1. Dabbagh, N.

# **Practitioner Guidelines**

In 1999, Robert G. Bringle and Julie A. Hatcher developed five guidelines specific to designing critical reflection activities (Bringle, R.G. & Hatcher, J.A., p.182):

# REFLECTION GUIDELINES

- Clearly link the experience to the course content and learning objectives.
- 2. Be structured in terms of description, expectations, and the criteria for assessing the activity.
- 3. Occur regularly during the semester so that student can practice reflection and develop the capacity to engage in deeper and broader reflection.
- 4. Provide feedback for the instructor about some of the reflection activities.
- 5. Include the opportunity for students to explore, clarify and learn how to improve their critical analysis and alter their values.

Critical reflection must be distinguished from wandering "Dear Diary" intrigues or stagnant journal entries of their daily activities. The above guidelines help establish a consistent structure and feedback loop for students to develop their critical reflection and personal learning. Faculty practitioners can promote more transformative student learning by expending more attention to the reflection activity design, course objective linkages, consistency, and assessment. For long-term experiential education activities such as internships and co-ops, a simple pre and post-experience reflection paper without regular journal reflections in between may unintentionally skip over valuable learning moments staggered throughout the student's experience.





#### **Repertoire of Reflection Activities**

Expanding the repertoire of reflection activities is another good way to better draw out critical thinking in students doing experiential education. Incorporating variety will also appeal to different student learning styles oriented more strongly to feeling, thinking, observing, or doing (Eyler, J., Giles, Jr., D.E., and Schmeide, A., 1996, p.47). Eyler, Giles, and Schmeide have outlined four common categories of activities which correspond to these learning styles and are suitable for either individual or group reflections as summarized below (1996, p.56-59).

**Written** reflection activities such as a journal, reflective essays, integrative papers, community newsletters, or position papers, are the most commonly used assignments within internships and co-ops. These are also "the most consistently linked to such personal outcomes as reductions in stereotyping and increased tolerance and to the academic outcomes of problem solving and critical thinking and perspective transformation," pulling from Eyler and Giles (1999) as quoted by King (p. 14).

The Critical Incident Journal is a simple model developed by T.K. Stanton that creates a good outline for deeper thinking (Bringle, R.G. & Hatcher, J.A., 1999, p.181). In this model, students are asked to think of specific moments throughout their experiences that embodied a turning point, and then answer the following three questions:

- 1. Describe your role in the incident.
- 2. Analyze the incident.
- 3. What impact did the incident have on you?

**Doing** reflection activities can include artistic reflections, collages, photo displays, video, role playing/simulations, advocacy work, program development, electronic mediums, and theater.

**Oral** reflection activities can involve one-on-one meetings, large group discussions, interviews, mentoring, teaching a class, story-telling, and legislative involvement.

**Reading** reflection activities can include case studies, current affairs articles, and community newspapers.

#### **Assessment**

Assessment of reflection activities is the hinge that often maximizes student growth. Faculty practitioners can be hesitant to grade reflection activities due to their subjective nature. However, it is important that the process of student reflection, not the tenets or values therein, is evaluated in order to encourage students to move upwards through the hierarchies of critical reflective thinking.

James Bradley has created one of the best assessment models for student reflection that bridges knowledge and experience, known as Bradley's Criteria for Assessing Levels of Reflection (Bringle, R.G. & Hatcher, J.A., 1999, p. 87). Bradley's Criteria define three levels from basic to sophisticated, outlined in the table on page 18:



# **BRADLEY'S CRITERIA FOR ASSESSING LEVELS OF REFLECTION**

# **LEVEL ONE**

- 1. Gives examples of observed behaviors or characteristics of the client or setting, but provides no insight into reasons behind the observation; observations tend to become dimensional and conventional or unassimilated repetitions of what has been heard in class or from peers.
- 2. Tends to focus on just one aspect of the situation.
- 3. Uses unsupported personal beliefs as frequently as "hard" evidence.
- 4. May acknowledge differences of perspective but does not discriminate effectively among them.

# **LEVEL TWO**

- 1. Observations are fairly thorough and nuanced although they tend not to be placed in a broader context.
- 2. Provides a cogent critique from one perspective, but fails to see the broader system in which the aspect is embedded and other factors that may make change difficult.
- 3. Uses both unsupported personal belief and evidence but is beginning to be able to differentiate between them.
- 4. Perceives legitimate differences of viewpoint.
- 5. Demonstrates a beginning ability to interpret evidence.

#### **LEVEL THREE**

- 1. Views things from multiple perspectives; able to observe multiple aspects of the situation and place them in context.
- 2. Perceives conflicting goals within and among the individuals involved in a situation and recognizes that the differences can be evaluated.
- 3. Recognizes that actions must be situationally dependent and understands many of the factors that affect their choice.
- 4. Makes appropriate judgments based on reasoning and evidence.
- 5. Has a reasonable assessment of the importance of the decisions facing clients and of his or her responsibility as a part of the clients' lives.

Without direction from faculty advisors, students will tend merely to talk about their observations and experiences at level one. Such descriptions typically mention isolated aspects of the experience without further insight, consideration of contributing variables, or evidence to support their personal statements of belief. Even if the experience is a "critical incident" that affects the student's feelings or beliefs, the reflection still remains at the ground level of critical thinking development until the student pauses to consider multiple perspectives, interpret broader evidence, or reason through alternate solutions to a problem.

# Reflecting on Developmental Stages of the Experience

Sweitzer and King have identified five developmental stages that all students tend to experience in their internship or co-op placement. At variable rates of movement, students approach their internship with anticipation, then disillusionment, confrontation [of goals and expectations], competence [achievement and confidence], and finally culmination [fulfillment and departure] (Sweitzer, H.F. & King, M.A., 2009, p. 49-59). Practitioners can share this model with their students for incorporation into reflection activities. A student's individual learning journey will be marked by concerns and obstacles that are most meaningful to them at each of these stages. But in their research, students also reported comfort in reading about the developmental stages and reflections of fellow students, incorporating into their own reflections an amazement that "my stages and concerns are not unique to me" (Sweitzer, H.F. & King, M.A., 2009, p.58). Over the course of the semester, the multiplying power of critical reflection can be one of the most powerful and transformational tools for student engagement, learning, and personal development.



# 4. Importance of Learning Outcomes and Assessment

Experiential education settings provide a strong context for rich learning opportunities through exposure to new environments, skills practice and development, real-world scenarios, and reflection upon "critical incidents" or "A-ha" learning moments. A key benefit of the academic internship or co-op experience is the opportunity for faculty mentoring and oversight in addition to that of the site supervisor. Course design and personal learning objectives are integrated to frame the student's entire reflective learning process to reach desired outcomes. Individual achievement of learning objectives related to the course objectives, and combined in a class setting with the group benefits of peer-to-peer learning and faculty facilitation, will constitute the true benchmarks of a student's success.

In order for the student's experiential education activities during the internship or co-op to provide real personal and academic learning and development, prior planning must occur on the part of the student and educator. Establishing clear objectives, designing activities tied to the objectives, and critical assessment of not only the technical skills developed by the activities, but also critical reflection on self-awareness, interpersonal skills development, values, failures and successes is the foundational process that will readily lead to the testing of ideas in action and benefitting new learning (NSEE Foundations Document Committee, 1997).

Therefore, four key steps to ensuring a successful experience are:

**Goal and outcome setting** inclusive of industry knowledge, skills to develop, application to academic theory, communications to transpire, and reflection on the relevance of education, prior life experience and future aspirations, should be co-designed by student and faculty.

**Objectives** coinciding with those goals and outcomes must be written to reflect what the student wants to learn, how the student will learn it, how the student will demonstrate the learning, and how the student will consider the impact of their learning. Objectives must be relevant, prioritized, and dynamic, open to modification as necessary.

**Activities** should be identified that will support these objectives. They should be developed from formal resources such as a job description, and informal resources such as conversations about upcoming projects with the site supervisor.

**Assessment** by both the employer and the faculty should flow from the development of learning objectives, how the student meets those objectives, and how the student demonstrates or presents learning. A student's personal assessment is inherently needed in experiential education programs and can be demonstrated through self-evaluations, portfolio development, critical written reflections, or verbal presentations of cumulative learning on the job.



# Part II: Planning

Planning for a successful internship or co-op requires forethought on the part of the institution, the student and the sponsoring host site organization. Outlined below are suggested steps for all parties to consider before implementing the internship or co-op. It is incumbent on all parties to be aware of the various nature of challenges raised by each of these steps and plan accordingly. Individual campuses or programs of study may have unique situations that impact the planning process and add constraints or requirements to be considered. However, the following statements represent considerations that will probably be common to all.

# 1. Timeline

Planning by all parties should generally take place during the semester prior to the actual internship or co-op. Ideally, enough time should be set aside in the planning process to avoid any delay in the commencement of the actual internship or co-op.

On the part of the student, time is required to prepare for an internship or co-op experience, including identifying career interests, searching for an internship or co-op, developing a resume and cover letter, preparing for the interview, and attending any orientation programs required by the college.

Students often severely underestimate this timeline. Students should be informed of appropriate expectations and financial aid considerations in advance in order to find the best-suited internships or co-ops, appropriately plan for their academic and personal schedules, and ultimately achieve success in their internship or co-op experience.

On the part of the institution, time is required to review student eligibility and course prerequisites, approve registration, assign appropriate faculty advisors if not part of a regular course, and assist with resumes as well as the interview process. Orientation trainings may also be a part of this planning process. Coordinators or faculty may also be involved in soliciting potential internship or co-op host sites, making referrals, coordinating with Human Resources personnel or supervisors for work expectations tied to the course requirements, and answering employer questions on internship/co-op paperwork. The institution also needs to approve the internship or co-op job descriptions for appropriate student placement and award of credit.

On the part of the host site organization, well organized employers will have completed their internship or co-op hiring process in advance. This could range from a few weeks up to 3-4 months in advance of the internship/co-op start date, particularly for highly competitive positions. New host site employers designing an internship or co-op position may also require several weeks advance time to plan work projects, draft job descriptions, approve intern/co-op supervisors, and arrange for training, workspace, or budgetary requirements.



The following table outlines the major activities and timeframes for a student to consider in internship or co-op planning, using the prior semester as a general planning timeframe. Institutional and employer host site roles and responsibilities are also taken into consideration in these timeframes:

STUDENT PREPARATION TIMELINE												
= activity taking place	=	mile	stone	e rea	ched							
Number of weeks before Internship/ Co-op start												
Student Activity	1	16	14	12	10	8	6	4	2	Start		
Pre-Internship/Co-op												
<ul> <li>Review eligibility requirements or course prerequisites for your major.</li> </ul>												
Schedule and attend an internship/co-op orientation or meet with faculty/coordinator to obtain approval for participation.												
<ul> <li>Register for internship/co-op course (requires sign-off to register).</li> </ul>												
<ul> <li>Develop and submit a resume to begin interview/placement process.</li> </ul>												
☐ Search, interview, and secure internship/co-op site.												
<ul> <li>Complete pre-screening processes and obtain job description from site supervisor.</li> </ul>												
<ul> <li>Obtain approval from faculty/coordinator for internship/co-op site.</li> </ul>												
☐ Create a work schedule with site supervisor.												
Plan your next semester personal and academic scheduled to prepare to work the scheduled hours.	Jles											

# 2. Student Eligibility

There are several parameters that need to be considered in determining a student's eligibility for an internship or co-op, which include academic and personal factors.

# **Eligibility Determinations**

The designated coordinator, faculty, or staff member should assist upfront in reviewing a student's academic standing, eligibility, career and transfer goals. He or she should also advise students on additional planning considerations and appropriate steps to prepare for the internship or co-op experience. Resource materials can assist in this process, including website information, introductory orientation workshops, a student application form, handbook, or student checklist (Appendix B).

# **Special Considerations**

**Work Schedules:** Students should be advised upfront that the majority of internship and co-op host sites will require a student to be available during normal business hours (9-5 Monday through Friday), for minimum time blocks of 3-4 hours, and for 2-3 days of each work week during the semester. If a student is unable to arrange existing work, academic, and personal commitments to accommodate for this, understanding needs to be clear that evening or weekend placements are not guaranteed, and he/she may be ineligible for the co-op or internship.

**Medical Insurance:** Students should be advised upfront that all Massachusetts Community Colleges internship and co-op students will be required to sign the MCC Acknowledgement of Risk and Consent



form (Appendix A-3) indicating they possess current medical insurance coverage. Massachusetts state law currently requires residents to have health insurance. But MCC enrollment policies currently only require students taking 9 or more credits to provide proof of medical insurance coverage, so this advisement may be particularly pertinent for part-time students.

#### **Academic Eligibility**

Internship and co-op opportunities are geared to build upon skills and knowledge already developed in the classroom setting. Degree-seeking students must generally obtain sophomore (24 credits) status, successfully complete three courses in their major or be co-currently registered, and have a GPA of 2.0 or higher to be eligible to participate in a credit-bearing internship or co-op. Students enrolled in certificate programs must generally be in the second half of their program, successfully complete three courses in their major or be co-currently registered, and have a GPA of 2.0 or higher to be eligible to participate in a credit-bearing internship or co-op. A majority of academic programs on individual campuses may require a higher GPA for participation, or additional course pre-requisites for the major.

**Eligibility Waiver:** Only in special circumstances should a student be exempted from these requirements. Students not meeting the minimum requirements must obtain an eligibility waiver from the appropriate coordinator, department chair, academic dean or senior administrator.

# **Eligibility Approval Process**

Each campus should develop a process of internship/co-op eligibility approval granted by the appropriate Academic Dean, Assistant Dean, Department Chair, Internship/Co-op Coordinator or other designee. All students seeking to register for an internship or co-op course should receive prior approval as appropriate to the skill level and academic expectations for going out on internships and co-ops as well as representing their college and the quality of their specific academic program in the community.

# 3. International Student Eligibility

International students enroll at Massachusetts Community Colleges typically on F-1 student visas, whereby opportunities for employment, internships or co-ops, are limited by immigration regulations. The international student center of your campus should be consulted for advice and the most current reporting regulations from the U.S. Department of Citizenship and Immigration Services (USCIS) and U.S. Department of Homeland Security. Working without proper authorization is a violation of legal status that will require termination of their record by the Designated School Official (DSO) in the Student and Exchange Visitor Information System (SEVIS) database, and the student will not be able to continue their studies or remain legally in the U.S. (U.S. Citizenship and Immigration Services, 2011).

International students may participate in paid and unpaid internships or co-ops, either on or off-campus; however the terms of their experience are subject to specific requirements, (outlined in more detail in Part IV. Advisory: Section 1). For planning purposes, practitioners should be aware that international students are generally not eligible for credit-bearing internship or co-op experiences in their first academic year (9 months), and that if an internship or co-op offers compensation (including forms of compensation other than monetary compensation) a student will need to work with the designated campus administrator to apply for Curricular Practical Training (CPT) or Optional Practical Training (OPT).

Advance planning is required. It may take up to 2-14 weeks for proper work authorization. A distinct course in the academic program of study is often required in order to qualify as approved educational practical training in the form of CPT or OPT. Work hours of more than 20 hours per week (including any existing on-campus employment) will also have implications for processing work authorization, both in the present and as it impacts the one-year period of eligibility for OPT typically upon graduation.



# 4. Transfer

Presently, there are a small number of individual internship and co-op academic programs at various campuses of the Massachusetts Community Colleges which have articulated credit to baccalaureate institutions. A key objective across many faculty, practitioners, and administrators is to increase such opportunities available to students in the future.

With this in mind, the current Associate Commissioner for Academic and P-16 Policy of the Massachusetts Board of Higher Education has released the following statement in support of the work of the MCCEE Committee in developing this handbook:

The Commonwealth Honors Program (CHP) is a solid statewide model which provides specific criteria that academic programs and courses must meet to qualify as CHP at participating community colleges, state universities, and University of Massachusetts campuses. The campuses and the state should consider building on the recommendations provided in this handbook to create a similar set of statewide criteria for internships/co-ops to ensure their transferability across the Massachusetts public higher education system. -- Francesca Purcell, Associate Commissioner, Board of Higher Education of Massachusetts

A long term goal is for all students transferring to baccalaureate state institutions that have participated in a 200-level internship/co-op course at one of the Massachusetts Community Colleges to be able to transfer their credits into their intended academic programs, whether as program electives or general electives. A unified course description among the 15 community colleges such as in the Sample Standard Syllabus (Appendix C) and a common set of academic criteria will help to strengthen the acceptance and transferability of internship/co-op academic credit to the four-year schools.

# 5. Site Selection

# **Site Requirements**

Appropriate internship and co-op sites will provide students with practical experience in their area of academic program. Host sites are required to provide a job description to match the suitability of the proposed experience to the overall academic learning outcomes of the course design. The site's personnel should also be willing and available to provide mentoring and instruction to students as part of their experiential education opportunity.

The student should communicate any special requirements such as transportation, work schedule, or limitations that cannot be reasonably accommodated by the site early in the process to assist in better site selection.

Faculty advisors or the designated internship or co-op education coordinator may use professional contacts to develop opportunities at appropriate sites. In collaboration with the coordinator or faculty, students are required to take responsibility for researching, identifying, and securing possible opportunities.

The college should approve all host site placements with related job descriptions. However, final site selection is ultimately at the discretion of the student and employer, and may be incumbent upon background screening or pre-employment checks by the host site.

#### **Site Approval Process**

Each campus should plan to develop a process of site approval. The appropriateness of the site will be determined by the CAO/Academic Dean or his/her designee. At some campuses this designee will be an Assistant Academic Dean, Department Chair, or Internship/Co-op Coordinator. Sign-off is required on the MCC Internship/Co-op Agreement (Appendix A-2).



# 6. Credit

Students will work a minimum of 45 hours per one credit hour. The basis for this minimum is the assumption that one hour of academic credit involves 15 hours of instructional time plus 30 hours of supplemental time over the course of a 15-week semester. This award system of credit is in keeping with national educational practices.

# 7. Learning Outcomes, Objectives, and Activities

The institution shall ensure that credit is granted to students who have achieved the stated objectives of each learning activity, in addition to completing the required number of hours at the internship or co-op site. Activity design should match the institutional, program of study, and course outcomes set forth in the academic catalog, departmental assessments, self-studies, or related institutional materials. The course syllabus must include learning outcomes, objectives and activities as well as an evaluation method to assess the quality and quantity of the learning achieved. Evaluative criteria should be held to the same academic rigor as courses in the traditional classroom setting. The importance of learning outcomes and assessment are pedagogical to the intrinsic 'real learning' value of a student's experiential education experience (further outlined in Part I: Pedagogy: Section 4).

#### **Definitions**

**Learning outcomes** focus on the end result of a learning experience. They describe 'exit behaviors' or broad aspects of desired behaviors that demonstrate the significant learning of a set of essential knowledge, skills, and attitudes. They will be transferable to a wide range of work settings and are usually accomplished over time in several learning experiences throughout the course design (UConn).

**Learning objectives** tend to describe specific, discrete units of knowledge and skills and are associated with activities or specific workplace tasks to be completed, usually within a short time frame. Learning objectives and activities will support the demonstration of broader learning outcomes (UConn).

As a way of comparison, an example of a learning outcome for a graphic design internship/co-op could be:

• Demonstrate familiarity with a variety of tools and techniques in the process of producing professional work in the fields of graphic design, advertising, and illustration.

Specific objectives which support this outcome could be:

- Conceptualize and develop preliminary construction plans, and build mock-ups of three dimensional communication design projects using two different materials and techniques.
- Students will identify specific cultural, social and psychological aspects of advertising design expressed in different mock-ups.

# Development of Learning Outcomes, Activities, and Objectives

Students and faculty share in the design of learning outcomes and objectives, as relevant to the course objectives, a student's personal goals, and the job activities listed in the job description.

However, there are several national and local educational and professional bodies that have established quality standards for college level, experiential education internship and co-op programs relevant to employer-identified 21<sup>st</sup> Century workplace competencies. Among these are the Council for the Advancement of Standards in Higher Education (CAS), the National Society for Experiential Education (NSEE), and the Massachusetts Board of Higher Education Commissioner's Advisory Group on Undergraduate Education CAGUE 2009 Report in support of the "Vision Project."

For further information and resources, practitioners are encouraged to reference the CAS Standards (listed in full in Appendix F), NSEE's Eight Principles of Good Practice (Part I. Pedagogy: Section 2), and the CAGUE student learning outcomes (Appendix G).

The CAGUE report identifies the "aspirations and ideals" of the Advisory Group for the Commonwealth's students as grouped into three categories of student learning outcomes: College Level Fundamentals; Integrative Thinking; and Civic, Organizational, and Career Competencies (CAGUE, 2009, p.3). A summary of the latter two categories, most relevant to internship/co-op experiences are:

**Integrative Thinking** - centers on the methodologies from various disciplines to solve complex, real-world problems and to create new solutions. Such skills allow graduates to be successful in an ever-changing world.

- Critical Thinking and Informed Decision-Making root causes, multiple perspectives, abstraction
- Creativity and Innovation continuous improvement, dynamics of change, originality
- Problem Solving test hypotheses, learn from mistakes, persistence
- Systems Thinking holistic view, actions and unintended consequences to the whole

**Civic, Organizational, and Career Competencies** - encompass a range of personal, interpersonal, and group behaviors that are required to be an effective and successful citizen and worker in any organizational and/or career setting.

- Relevance of Education/Lifelong Learning global/ workforce trends, career knowledge
- Civic and Social Responsibility effective citizens, community, ethics
- Personal Responsibility choices, actions, values, personal compass
- Workplace Skills accountability, goals, project management, dependable workplace habits
- Teamwork/Collaboration-navigating conflicts, leadership, respect, responsibility

# MCCEE Standardized Internship/Co-op Learning Outcomes

In support of the combined groupings of these professional and educational quality standards for student learning outcomes, the MCCEE Committee has identified six key learning outcomes to meet the academic, personal, and transfer goals of internship and co-op programs. These six learning outcomes are also listed on the MCC Student Internship/Co-op Agreement (Appendix A-2), with space for the development of individually related program or student learning objectives:

# Academic learning outcomes for the student internship/co-op are intended to encompass all of the following:

- Develop technical skills and professional communications in a work setting.
- Understand industry and organizational structures, culture, and ethics.
- Apply and reflect on the connections to academic theory and practice.
- Strengthen critical thinking, research skills and problem solving skills.
- Develop a greater awareness and appreciation of self, others, and social responsibility in a work, career, and global context.
- Establish a network of professional contacts, mentors, and references.

For further resources and information, practitioners are encouraged to reference the Sample Learning Outcomes & Objectives Toolkit (Appendix E).

#### 8. Assessment

Assessment is the process of designing, collecting, analyzing, interpreting, and using information to evaluate students' learning and development or program effectiveness. Its two major purposes are to improve and to ensure accountability of college programs. Successful assessment plans consist of clear, obtainable goals and objectives, measurable outcomes, meaningful and accurate data, appropriate methods and techniques of measurement; and instructions for disseminating results (Erwin, 1991).



#### **Assessing Student Learning Outcomes**

Both quantitative and qualitative methodology should be used in assessing student learning outcomes, however, it is important to consider which method best suits the purpose of the study. Pre- and post-testing, interviews, journals, reflection assignments, inventories, evaluations, rating scales, and rubrics are examples of tools available to aid in assessment.

For further resources and information, practitioners are encouraged to reference Bradley's Criteria for Assessing Levels of Reflection (Part I. Pedagogy: Section 3), the Sample Learning Outcomes & Objectives Toolkit (Appendix E), and the Sample Student and Supervisor Evaluations of Student Performance (Appendices D1-D2).

#### **Assessing Program Effectiveness**

A bilateral employer and student evaluation process should be used to provide assessment data on the programmatic level for an institution's internship or co-op program. Successful assessment should identify program strengths and weaknesses, describe practices requiring follow-up, and summarize actions required to satisfy program standards. Additionally, successful assessment requires understanding the importance of the process and reported data, as well as student learning and development outcomes, as useful strategies for improving learning and program quality.

For further resources and information, practitioners are encouraged to reference the Sample Evaluation Forms (Appendices D3-D5), which include student and supervisor evaluations of the internship or co-op program, and an additional student evaluation of their host site.

#### **Advisory Committees**

Each campus is encouraged to establish and organize an Advisory Committee to provide a forum for the collection and expression of opinions and recommendations on matters relating to students, employers, and faculty participating in internship or co-op programs. Advisory committees may draw from professionals, educators, alumni, community members, or current students (CAS, 2006).

# 9. Recognition

The Massachusetts Community Colleges are encouraged to recognize students, educators and employers for achievements and contributions to the field of experiential education. Recognition programs could be on-campus or associated with regional or national academic and professional networks.

#### National and Regional Recognition

The National Society of Experiential Education (NSEE) honors leaders and programs each year for significant contributions to the field of Experiential Education. The Cooperative Education and Internship Association (CEIA) also annually recognizes students, researchers, educators and employers each year who have made outstanding achievements or significant contributions to the field of experiential education, including special awards for two-year community colleges.

# **On-Campus Recognition**

Students can be recognized in a variety of ways, including participation in the Commonwealth Honors Program, graduation awards ceremonies, co-curricular transcript notations, invites to Board of Trustees meetings, or capturing employer and student testimonials for promotional print or online materials.



# Part III: Implementation

It is important for the success of the internship or co-op experience that each party assume appropriate responsibilities to ensure that the student's experience fulfills the mission and goals of the program.

Below are generally accepted areas of responsibility for students, faculty, site supervisors, and experiential education coordinators. These statements may not fully address unique situations on individual campuses. It is incumbent on all parties to recognize those situations and act accordingly. Internships or co-ops require a combined supervisory effort between the college and the internship host site for the student learning experience.

The CAS Standards (Appendix F) establish further guidelines for each of the roles and activities summarized below.

# 1. Student Responsibilities

# Pre-Internship or Co-op

It is the student's responsibility to review the eligibility requirements and complete all paperwork required for participation. Students should familiarize themselves with their program's tasks, as may be listed in a Planning Timeline (Part II. Planning: Section 1) or *Student Checklist* (Appendix B). Significant work is involved in identifying internships and co-ops of interest, utilizing the coordinator and/or faculty as resources, conducting informational interviews with prospective organizations, developing resumes and cover letters, improving interview skills, and obtaining references, if required. All activities outlined above should reasonably occur the semester preceding participation.

# **Accepting a Position**

Students are encouraged to search more than one avenue for a position. However, once the student accepts an offer for an internship or co-op, it is the student's responsibility to promptly inform other organizations with whom they've interviewed that they have accepted an offer, thereby allowing the organization to fairly consider other candidates. If the student is working with referrals made by a faculty or coordinator, then communication also needs to be established clearly with all parties.

# **Required Legal Documents:**

Before the start of the internship or co-op, students are required to sign the MCC Acknowledgement of Risk and Consent form (Appendix A-3). At the start of the internship or co-op experience, students are responsible for completing and returning the signed MCC Internship/Co-op Agreement (Appendix A-2).

#### During the Internship or Co-op

# **Academic Requirements:**

Students will be responsible for successfully completing the required number of work hours at their host site, and all additional academic criteria that their faculty has set forth in the MCC Internship/Co-op Agreement and course syllabus.

Further guidelines are outlined in Part IV. Advisories: Section 3.



#### **Setting Learning Objectives:**

Students will work with their faculty and site supervisor to set learning objectives that are appropriate to the job description and the academic requirements of the course. The student may reflect on developing the following skills during their internship/co-op: technical or professional skills, critical thinking and analytical skills, research and information retrieval skills, verbal and written communication and negotiation skills, developing habits of self-awareness, and the ability to work in a team environment. Students are responsible to draft learning objectives for inclusion in the signed MCC Internship/ Co-op Agreement (Appendix A-2).

#### **Professionalism:**

Students enrolled across the fifteen community colleges of the Commonwealth are subject to the Massachusetts Community Colleges' Student Code of Conduct, as published in each campus's Student Handbook. This code outlines the general behavior policies, discipline, and grievance procedures pertaining to student rights and responsibilities appropriate to the college environment. As the internship or co-op site placement is an extension of the college learning environment, students are held to the same standards. Of particular relevance to the work environment is the student's responsibility to demonstrate professional behavior, confidentiality, appropriate dress, and punctuality. Students are required to report to work on time and work their scheduled hours. Students unable to report to work on time or work their scheduled hours should be informed of the need to contact their site supervisor as soon as possible.

# **Progress towards Learning Objectives:**

At midterm, the student, site supervisor, and faculty should review the MCC Internship/Co-op Agreement to affirm that the original learning objectives are still appropriate and obtainable, making modifications if necessary.

#### Issues at the Worksite:

The student should inform their faculty and/or coordinator of concerns that may arise regarding their site placement or ability to fulfill the terms of their internship or co-op experience.

# **Final Evaluations:**

To maximize learning, it is encouraged that the student complete a final self-assessment, as well as an evaluation of the internship or co-op site and program. All paperwork and evaluations for the course should be outlined for the student at the beginning of the experience, preferably in the course syllabus.

Student ethical and professional responsibilities are further outlined in the Legal Advisory (Part IV. Advisories: Section 3) and student portion of the MCC Internship/Co-op Agreement (Appendix A-2).

# 2. Faculty Advisor Responsibilities

# Pre Internship or Co-op

#### **Academic Requirements:**

Internship or co-op experiences must be described in a syllabus or plan. According to CAS, the syllabus should include (CAS, 2009, p. 7):

- purpose of the internship/co-op
- desired learning and development outcomes of the internship/co-op for all participants
- assignments that link the internship/co-op to academic, career, or personal goals
- opportunities to reflect on one's personal reactions to internship experiences
- logistics (e.g., time required, transportation, materials required, access to services and resources)
- roles and responsibilities of students and site personnel
- risk management procedures
- supervision and accommodation requirements by institution personnel and internship/co-op site



- evaluation of the experience and assessment of the extent to which desired outcomes were achieved
- course requirements, including criteria for grading

# During the Internship or Co-op

# Academic Assignments and Oversight:

Faculty oversee the academic direction of the learning experience and help students make connections between what they are experiencing and what they are studying throughout the course of their internship or co-op. Faculty creates assignments and assists in mentoring students to achieve the desired learning outcomes. Examples of assignments could include reading articles or sections of textbooks, writing reflective essays, weekly journals, or answering weekly reflection questions tailored to their experience, sharing a challenging case scenario from their internship or co-op site, participating in class discussion, or making portfolio presentations.

For further resources and information, practitioners are encouraged to reference the Sample Learning Outcomes & Objectives Toolkit (Appendix E) or Reflection resources (Part I. Pedagogy: Section 3).

# **Setting Learning Objectives:**

Faculty assist students in preparing for field experiences through goal setting and the discussion of objectives that might be achieved during the internship or co-op. Faculty approve the five key learning objectives listed in the MCC Internship/Co-op Agreement (Appendix A-2) as related to course learning outcomes, and forward documents to the designated co-op experiential education coordinator.

# **Progress Towards Learning Objectives:**

Faculty is required to be available to confer with the student and site supervisor regarding student progress throughout the course of the internship/co-op. This could be through class meetings, office hours, phone or email exchanges, or a site visit.

At midterm, the student, site supervisor and the faculty should review the MCC Internship/Co-op Agreement to affirm that the original objectives are still appropriate and obtainable, making modifications if necessary.

# **Grading for Award of Credit:**

Faculty is responsible to evaluate the experience and submit a grade at the end of the internship or co-op in accordance with the weighting of criteria set forth in the syllabus.

# Issues at the Worksite:

The faculty may communicate directly with the site supervisor and should also communicate with the coordinator as appropriate for concerns that may arise regarding a student's worksite placement or the ability of the student to fulfill the terms of their internship or co-op.

#### Final Evaluations:

All paperwork and evaluations for the student, course, or program should be outlined for the student at the beginning of the experience, preferably in the course syllabus.

Faculty ethical and professional responsibilities are further outlined in the Legal Advisory (Part IV. Advisories: Section 3) and the Faculty/College portion of the MCC Internship/Co-op Agreement (Appendix A-2).



# 3. Site Supervisor Responsibilities

# Pre-Internship or Co-op

#### Position Description:

The host site is responsible to provide a clear job description of the internship or co-op opportunity to the student, coordinator, and/or faculty. The host site is also responsible to provide information on any pre-screening procedures and requirements.

# During the Internship or Co-op

# **Approval of Learning Objectives:**

The site supervisor may collaboratively develop the terms of the learning objectives with the student, or may simply review and approve the learning outcomes and associated objectives proposed by the student in consultation with his or her faculty. The site supervisor agrees to provide sufficient job activities to support the student in achieving the desired learning outcomes.

# Mentoring, Supervision, and Training:

The site supervisor or Human Resources personnel should provide an orientation to the workplace and staff at the onset of the internship or co-op. This includes practical considerations and any training in safety and workplace procedures, just as a new employee would receive.

The supervisor should help students to understand their job responsibilities as it relates to the organization, and provide mentoring for the student's learning and development. Supervisors should establish a weekly meeting schedule with the student and address the holistic development of professional skills, attitudes, communications, and job responsibilities throughout the course of the internship or co-op experience.

# **Progress Towards Learning Objectives:**

At midterm, the student, site supervisor, and faculty should review the MCC Internship/Co-op Agreement to affirm that the original objectives are still appropriate and obtainable, making modifications if necessary. Site supervisors agree to participate in site visits, or telephone conferences, or email communications to confer with the faculty or coordinator and student regarding their progress throughout the course of the internship/co-op.

# Issues at the Worksite:

Site supervisors should communicate openly with the faculty or coordinator around student performance and issues as they arise, particularly if they may inhibit the successful completion of the internship or co-op experience.

#### **Final Evaluations:**

Site supervisors will be asked to provide feedback on a student's progress at the end of semester in a timely fashion to assist in the grading process. Site supervisors may also be asked to complete a final course or program evaluation. All paperwork materials should be outlined in advance for the site supervisor.

Site supervisor ethical and professional responsibilities are further outlined in the Legal Advisory (Part IV. Advisories: Section 3) and site supervisor portion of the MCC Internship/Co-op Agreement (Appendix A-2).



# 4. Coordinator Responsibilities

Internship and co-op coordinators work on a variety of program administration, student development and placement, faculty development, and employer relations activities throughout the academic cycle.

# **Program Administration**

# **Program Marketing:**

Coordinators will generally develop and market internship or co-op programs to students, faculty, college administration, and the employer community. This includes the creation of all print and online materials, handbooks, and reference tools.

#### **Institutional Coordination:**

Coordinators work with faculty and administrators to develop policies, procedures and forms required to conduct the operations of the internship or co-op program, and to facilitate academic consistency and credibility across the institution. This may include recommendations or inputs on program development, course modifications, working with new faculty, available stipends, student preparation, eligibility, and orientation, and program evaluation.

#### **Student Development and Placement:**

Coordinators may work with faculty departments or career services to develop procedures and materials required for student participation in internships and co-ops. This may encompass orientations, internship or co-op search, resume development, interview prep, or additional preinternship work (further outlined in Part II. Planning: Sections 1-3). In many cases the coordinator will be the designated campus administrator approving a student's eligibility to register for the course, as well as to approve the site placement. The coordinator may become particularly involved in site development and student preparation for students requiring special assistance due to a variety of academic or personal circumstances.

Coordinators may continue to be the main point of contact for site issues that might arise once the student is on the internship or cooperative education experience, particularly if the site referral came through the coordinator. Coordinators are also involved in a general overall monitoring of the student internship or cooperative education experience, through formal evaluation management or informal student and site supervisor check-ins.

Coordinators may also follow up with students in focus group studies, or gather testimonials of students for improved understanding of placement, community relations, and program development.

# Faculty Development:

Coordinators work to support and engage faculty on their campuses in developing best practices for course syllabus design, learning outcomes, reflection activities, and final evaluations for assessment of internship and cooperative education programs. This support may come in the form of documents, workshops, facilitated peer learning groups or budget for sending faculty to national or regional professional development conferences. Coordinators may also directly participate in internship and co-op seminars or classroom meetings as invited to facilitate group reflections, or discuss institutional policies and procedures.

# **Employer Relations:**

Sustainable internship and co-op programs require an ambassador of the college to promote new opportunities, attend to any issues that may arise in the workplace, and follow up with an appropriate level of partnership care.



New internship/co-op site sponsors will need an initial orientation to the college's procedures, academic requirements, timelines, and expectations. Often, the host site Human Resources office will also need time to review and approve the legal document of the MCC Internship/Cooperative Education Agreement. First-time employer sponsors may also require further education and consultation on designing and implementing an effective internship or co-op program, including establishing resource, space and supervision requirements as well as appropriate intern work tasks. Additionally, coordinators may need to work closely with potential employer sponsors to help them become more familiar with academic standards and the importance of learning objectives for the award of credit, as well as federal requirements for unpaid interns as provisioned for the "educational benefit" of the students under the Fair Labor Standards Act (further outlined in *Part IV*. Advisories: Section 5, and Appendix H).

Coordinators may also invite host site organizations to campus or organize college wide fairs to better promote opportunities and facilitate connections between the community, students, and faculty.

#### **Records Management:**

Coordinators are responsible to maintain secure records/documents related to the experiential education program for a minimum of five years from the time of the internship or co-op experience. This includes the MCC Internship/ Co-op Agreement and MCC Acknowledgment of Risk and Consent forms (Appendices A2 and A3). Timely collection of these legal documents is a critical component of record-keeping (further outlined in Part IV. Advisories: Section 3).

Coordinators are also asked to provide institutional data and reports that track year to year enrollments, placements, trends, program or course evaluations, and student data for civil rights and grants audits, such as special populations or nontraditional career categories under the Federal Perkins grant.

#### Recognition:

Coordinators should consider developing intentional recognition practices to support the sustainability and growth of their internship and co-op programs. Recognition may extend to include students, faculty, and community partners (further outlined in Part II. Planning: Section 9).



# Part IV: Advisories

In order to design experiential educational placements that meet state and federal guidelines, it is recommended that internship or co-op practitioners and administrators take into consideration the following advisories:

# 1. International Students and Off-Campus Work Authorization

International students enrolled typically on F-1 student visas at Massachusetts Community Colleges, are limited by immigration regulations regarding opportunities for employment, internships or co-ops. The International Student Center of your campus should be consulted for advice and the most current reporting regulations from the U.S. Department of Citizenship and Immigration Services (USCIS) and U.S. Department of Homeland Security. Working without proper authorization is a violation of legal status that will require termination of their record by the Designated School Official (DSO) in the Student and Exchange Visitor Information System (SEVIS) database, and the student will not be able to continue their studies or remain legally in the U.S. (U.S. Citizenship and Immigration Services (USCIS, 2011).

#### F-1 Student Visa: Academic Student

The F-1 Visa allows International Students to enter the United States as a full-time student at an accredited college, university, seminary, conservatory, academic high school, elementary school, other academic institution, or in a language training program, provided the course of study culminates in a degree, diploma, or certificate (USCIS, 2011). As of this writing, F-1 students may engage in unpaid or paid internship and co-op experiences according to the below considerations.

# **Unpaid Internships and Co-ops**

International students on F-1 visas may participate in unpaid internships/co-op or volunteer positions to gain experience without needing to obtain prior work authorization from U.S. Citizenship and Immigration Services (USCIS), as this is not considered employment.

However, care should be taken to properly understand what constitutes an unpaid position. Below are two common violations of the criteria for an unpaid position, both of which would require prior work authorization from USCIS through the campus DSO of your International Student Center:

- Volunteer work in a position that another American citizen is getting paid for:
   A student is in violation of their status if they 'volunteer' to do the exact same position that another intern, co-op student, or employee is getting paid for, because he/she is not authorized to work legally in the U.S.
- 2. Receiving forms of compensation other than monetary compensation:

A position may be called an unpaid internship/co-op by an employer, but according to the Federal government, work authorization is required for a student receiving non-monetary compensation in exchange for work performed, including tuition/ fees paid, housing or travel stipends, or free rent. Employer benefits such as employee discounts, free or reduced admission to museums, and on-the-job training programs are exempt from being considered as any form of compensation.

# Paid Internships and Co-ops

F-1 students may engage in three types of paid internships or co-ops, both on-campus and off-campus. The three types of employment opportunities are **on-campus employment**, **CPT**, **or OPT**.

#### On-campus Employment:

A suitable on-campus job may also qualify for an academic internship or co-op credit-bearing experience. F-1 students may work part-time on campus as soon as their first semester, without permission from USCIS, as long as they maintain their F-1 eligibility and academic standing with the College. Part-time is defined as no more than 20 hours total per week while classes are in session, and up to 40 hours per week during vacation periods and academic breaks, if the student is returning

to classes the following term. A Social Security Card is required for tax purposes and can be applied for at the local government office with appropriate documentation from your campus International Student Center. It can take 3-4 weeks after applying for a student to receive their Social Security card at their home address, and will not be valid for any employment off-campus.

# Curricular Practical Training (CPT) offered as part of the Academic Program:

The Federal CPT Work authorization program allows an eligible F-1 student to participate in a paid internship or co-op off-campus prior to the completion of their Academic Program in accordance with the following regulations:

**Eligibility:** An F-1 student may be authorized by the DSO to participate in a curricular practical training program that is an integral part of an established curriculum. Curricular practical training is defined to be alternative work/study, internship, cooperative education, or any other type of required internship or practicum that is offered by sponsoring employers through cooperative agreements with the school. A request for authorization for curricular practical training must be made to the DSO. A student may begin curricular practical training only after receiving his or her Form I-20 with the DSO endorsement (U.S. Immigration and Customs Enforcement (USICE), 2011).

# <u>CPT Federal Requirements</u> (USICE, 2011)

- 1. Be in lawful F-1 status for two consecutive, non-ESL semesters
  - F-1 students are not eligible to work off-campus, including paid internship or co-op experiences, at all during the first academic year (9 months), except for rare circumstances of demonstrated and unforeseen severe economic necessity.
  - F-1 students maintain lawful status by being enrolled full-time and in good academic standing. Incomplete grades or withdrawals from a previous semester will not usually qualify for CPT authorization.
  - F-1 students in English language training programs (ESL) are ineligible for practical training.
- 2. Enrollment in a CPT-approved course for the duration of the internship or co-op
  - The proposed work experience would fulfill an internship/ co-op course or a career elective course as listed in the academic catalog for the student's major.
  - The proposed work experience fulfills the course requirements of a standard course, with special approval of the Department Chair and appointment of a Faculty Advisor for an Independent Study course. If no such course can be substantiated in the curriculum for that major, a student will not be considered eligible to apply for Curricular Practical Training by federal regulations.
  - Withdrawing from or dropping credits that are tied to CPT work authorization immediately cancels the CPT authorization.
- 3. Maintain lawful F-1 status for the duration of the internship or co-op
  - F-1 students must maintain lawful status by continuing enrollment full-time and being in good academic standing. Only in special circumstances can the DSO or International Student Center authorize less than a 12-credit load to be considered full-time, such as if it is their final semester for graduation.
  - Withdrawing from or dropping credits that are tied to CPT work authorization will also affect
    their legal F-1 status, unless these credits are replaced with another course added in the same
    semester.
- 4. Provide an employer offer letter to the DSO or International Student Center
  - An offer letter from the employer host site on company letterhead must generally include the job title and detailed description of duties, start date and end date, supervisor name and title, and number of hours that will be worked per week. It is not sufficient to simply list 'part-time' or 'full-time.'



# **CPT Authorization:**

- 1. Approval: The DSO or International Student Center will approve and issue a new I-20 with notation of the internship on the back. A student can begin their off campus CPT as of the employment date noted. Provided all the above eligibility requirements and documentation is met, the CPT approval process can be relatively quick.
- 2. Social Security Card: A Social Security Card will also be required for tax purposes and can be applied for at the local government office with appropriate documentation from your campus International Student Center. It can take 3 to 4 weeks after applying for a student to receive their Social Security card at their home address.

#### **CPT Special Considerations:**

- Term: The term of work authorization issued under CPT is usually limited to one semester, though in special circumstances it may be extended from the Spring semester into the Summer semester.
- 2. Hours: A student is authorized under CPT to work part-time or full-time:

Part-Time is 20 hours or less per week.

• F-1 students can use an unlimited amount of part-time Curricular Practical Training and still get 12 months of Optional Practical Training following completion of studies.

Full-Time is 21 – 40 hours per week.

- F-1 students holding a part-time job on campus of 20 hours are not authorized to work more than 20 hours additionally on CPT.
- F-1 students on CPT full-time are still required to maintain full-time student status while school is in session. While at some baccalaureate institutions, a full course load of internship/co-op credits is granted that allows students to participate in full-time internship/co-op experiences, at the community college level, typically no more than 3-6 total credits can be used to satisfy requirements for any one degree or certificate. The ability of the student to work 20-40 hours per week, while maintaining a full course load in good academic standing should be taken under advisement.
- It is important to advise F-1 students that working more than 20 hours per week while school is in session during spring or fall can affect the terms of their future eligibility for CPT. They should consult their International Student Center.

# Optional Practical Training (OPT) not offered as part of the Academic Program:

A majority of international students apply for OPT upon receiving their degree, which allows them to work in their field for the equivalent of one year of full-time employment. But a student may choose to do this employment before graduating. The Federal OPT work authorization program allows an eligible F-1 student to pursue temporary employment related to their field of study, including paid internships or co-ops as an alternative to CPT if it is not offered as an integral part of the course curriculum for their major, in accordance with the following regulations:

**Eligibility:** A student may apply for authorization for temporary employment for Optional Practical Training directly related to the student's major area of study. A student may be granted authorization to engage in temporary employment for Optional Practical Training:

- 1. During the student's annual vacation and at other times when school is not in session, if the student is currently enrolled, and is eligible for registration and intends to register for the next term or session.
- 2. While school is in session, provided that practical training does not exceed 20 hours a week while school is in session.
- 3. After completion of all course requirements for the degree or course of study (USICE, 2011).



### OPT Federal Requirements (USICE, 2011)

- 1. Be in lawful F-1 status for two consecutive, non-ESL semesters
  - F-1 students are not eligible to work off-campus, including paid internship or co-op experiences, at all during the first academic year (9 months), except for rare circumstances of demonstrated and unforeseen severe economic necessity.
  - F-1 students maintain lawful status by being enrolled full-time and in good academic standing. Incomplete grades or withdrawals from a previous semester will not usually qualify for OPT authorization.
  - F-1 students in English language training programs (ESL) are ineligible for practical training.
- 2. Pursue a co-op or internship related to their field of study
  - Off-campus employment unrelated to their field of study (such as a restaurant or store, unless they are in a Hospitality or Business Management internship) requires special authorization and is approved only in certain circumstances by USCIS.
- 3. Maintain lawful F-1 status for the duration of the internship or co-op
  - F-1 students must maintain lawful status by continuing enrollment full-time and being in good academic standing. Only in special circumstances can the DSO or International Student Center authorize less than a 12-credit load to be considered full-time, such as if it is their final semester for graduation.
- 4. Approval: OPT is approved by the USCIS.
  - The DSO or International Student Center will issue a new I-20 with notation of the internship on the back.
  - A student must submit new and previous I-20 forms, along with additional forms and documentation to the local USCIS office, and pay a processing fee.
  - A student cannot begin their off-campus OPT until the date indicated on his or her Employment Authorization Document (EAD card), Form I–766 or Form 688B. The OPT approval process can take 6-12 weeks to complete, particularly during peak times before the summer.
- 5. Social Security Card: A Social Security Card will also be required for tax purposes and can be applied for at the local government office with appropriate documentation.
  - OPT authorization from USCIS does not require an employer offer letter, but application for a Social Security Card does. It can take 3-4 weeks after applying for a student to receive their Social Security Card at their home address.

### OPT Special Considerations: (U.S. Customs and Immigration Enforcement)

- 1. Term: If a student chooses to apply for OPT before they graduate in order to participate in a paid internship or co-op, that time will be subtracted from the one year (12 months) of full-time eligibility. Students considering OPT should be closely advised by the International Student Office. This may affect a student's plans to transfer to another academic institution or predicate a need to return to their home country sooner than they originally expected. Also, it is strongly recommended that students wait until they finish their degree because they will more likely benefit from a more challenging work experience.
- 2. Hours: A student is authorized under OPT to work part-time or full-time, dependent upon when school is in session.

Part-Time is 20 hours or less per week.

• OPT may not exceed 20 hours a week while school is in session.

Full-Time is 21 – 40 hours per week.

- OPT may only exceed 20 hours per week while school is not in session during semester breaks or the summer.
- F-1 students holding a part-time job on campus of 20 hours are not authorized to work more than 20 hours additionally on OPT.



All of the regulations on page 36 are subject to change in accordance with the development of new federal laws and policies. For the most up-to-date information on work authorization requirements for international students, please consult your International Student Center DSO or the U.S. Citizenship and Immigration Services and the U.S. Immigration and Customs Enforcement websites listed in the Works Cited.

### 2. CORI / SORI and Other Pre-Screening Processes

In many employment settings today, job applicants, employees and volunteers are required to undergo criminal and sex offender background checks as a condition of employment. Background checks are routinely performed in employment settings where individuals will have the potential for unsupervised contact with "vulnerable populations" such as children, the elderly, or disabled. However, such checks may be performed in other employment settings as well. Criminal and sex offender background checks are performed for the purpose of determining an individual's eligibility for placement in an employment setting and in order to maintain a safe working environment.

#### **Definitions**

### Criminal Offender Record Information (CORI)

Criminal Offender Record Information is maintained by the Commonwealth of Massachusetts' Department of Criminal Justice Information Services (DCJIS). All CORI information is obtained through the DCJIS. CORI records report only Massachusetts criminal offenses. Currently, a CORI record reveals all adult criminal record information. Beginning on May 4, 2012, most CORI access will be limited to information regarding convictions for murder, manslaughter, sex offenses, other felony convictions that occurred within the last 10 years or for which the applicant was incarcerated within the last 10 years and misdemeanor convictions that occurred within the last 5 years or for which the applicant was incarcerated within the last 5 years. A CORI will also include pending or open cases. A CORI will not include juvenile criminal record information.

### Sexual Offender Registry Information (SORI)

Sex Offender Record Information is maintained by the Commonwealth of Massachusetts' Sex Offenders Registry Board (SORB). Sex offenders in Massachusetts are classified by the SORB as Level 1, 2 or 3. SORI on a Level 1 offender are not available to the public because a Level 1 offender is considered a low risk to reoffend. Level 2 & 3 sex offender information is public record information and may be obtained in some cases on-line or through the SORB or a local police department. A Level 3 offender is considered to pose the highest level of dangerousness and likelihood to reoffend.

### **Student Eligibility Advisement**

Students should be advised that the results of a criminal or sex offender background check may disqualify them for placement at some or all internship and co-op locations. Students should therefore be strongly encouraged to address and resolve any eligibility questions prior to commencing the internship/co-op process.

### **CORI/SORI Checks by Host Sites**

Many employers and organizations are allowed or required to do CORI checks on people who are applying for jobs, internships/co-op's and volunteer opportunities. Students may be subject to a CORI for their internship/co-op placement as part of the employer's hiring process as it is deemed relevant to the nature of their work, particularly if the student is participating in a program that has contact with children, the elderly, disabled and/or persons receiving care due to illness. Industry sectors that frequently use criminal background checks as part of the hiring process include criminal justice, education, computer networking, security, or forensics companies, health care related institutions, and major hotels.

### **Program Documentation**

Academic programs that offer internship or co-op courses that typically require CORI/SORI clearance should include notation as such in course catalogs and other related course materials.



#### **Student Process**

For an internship or co-op experience, in most cases the host site is the party responsible for conducting the CORI check. Students will be asked to complete a CORI/SORI release form as well as submit a copy of their driver's license to appropriate Human Resources personnel. Students must clear the CORI and SORI checks in order to attend their internship/co-op assignments. Students who indicate a residence other than Massachusetts on their application form or have recently moved from another state will be subject to CORI and SORI checks in that state.

Students should be advised that it can take up to 5 weeks processing time for the host site to receive CORI/SORI reports and approve clearance for a student's start date.

### **CORI/ SORI Disqualifications**

Depending on a student's record, the student may be ineligible for participating in the desired internship/co-op experience. Certain offenses result in a presumptive mandatory disqualification. For other categories of offenses, disqualification will be based on the host site's discretionary assessment. CORI records contain a lengthy list of codes that are best interpreted by a professional. The designated campus administrator for CORI/SORI may also be consulted for further information and guidance.

### <u>Special Considerations:</u>

- Obtaining a Personal Record: Students may request their personal CORI through the Department of Criminal Justice Information Services (DCJIS). A fee will be charged unless the student qualifies for a waiver through TAFDC, EAEDC, SSI, Mass Health, Massachusetts Veterans' Benefits, or as a result of economic hardship.
- Check for mistakes: CORI reports are not always accurate. A student can review their CORI to make sure that the information about their cases is correct, and that all of the cases listed in the CORI belong to them. To correct errors, a student may begin by contacting the DCJIS or the Court Probation office where their case was heard.
- Preparing for interviews: Students should understand that host sites are permitted to ask about a CORI or SORI record and should therefore be prepared to explain the circumstances leading to their criminal conviction or pending case.

For more information about CORI and SORI checks, please consult the Massachusetts State website authored by Community Resources Inc. www.massresources.org listed in the Works Cited.

### **Additional Pre-Screening Checks**

Some employers may require additional information and/or background screenings prior to participation. Some screenings may require a small fee on the part of the students, such as finger-printing, additional immunizations or drug testing. Students should be advised that pre-screening checks can take up to three weeks, if not longer, particularly for non-U.S. Citizens even if they are a permanent resident.

### 3. Liability, Risk Consent, and Records Management

### Background

Experiential education placements in the form of internships and co-ops constitute a complex relationship between the student, college, and host site that involve professional ethics and a blending of educational and employment law at the federal and state level. In this triangular relationship, there are legal rights and reciprocal responsibilities of the student, host site, and college each to each other. Violation of a right or failure to carry out a responsibility may create potential for liability or risk of loss. A party may assume reasonable and foreseeable risks as it relates to the quality of knowledge expected and information provided (Goldstein, 2008).

For the college, basic responsibilities to the student and host site include non-discriminatory access and approval of an appropriate placement, articulation of academic requirements



and award of credit, adequate supervision and support, maintenance of student privacy, appropriate work consultation for student evaluation, and a method of dispute resolution.

For the student, basic responsibilities to the college and the host site include appropriate consultation with college and host site personnel, accurate representation of skills and experience, respect for policies, procedures, and professional ethics to perform the work required, and notification of circumstances that may impair successful completion of the internship or co-op experience.

For the host site, basic responsibilities to the college and student include non-discriminatory access, an accurate representation of the job duties, adequate supervision, tools, and training to perform the work required, a reasonably safe environment, agreed upon compensation, review of and adequate opportunity for the student to meet the academic requirements, and appropriate consultation for student evaluation or dispute resolution.

If students are being permitted to enter a workplace for a credit generating experience, all stakeholders need to be in agreement on the terms of the experience before it begins. A three way signed legal document between the college, student, and host site is the recommended way to clearly define the terms of the internship or co-op experience and outline acknowledgement of the responsibilities of each party to all.

### **Approved Legal Documents**

In December 2010, the MCC Internship/Co-op Placement Agreement (Appendix A-2) and MCC Internship/ Co-op Acknowledgement of Risk and Consent (Appendix A-3) documents were developed and finalized in consultation with the Massachusetts Community Colleges General Counsel's Office, as they pertain to an internship or co-op student in a credit-bearing experience.

### **Purpose**

In combination, these documents are designed to clearly define the terms of the internship/co-op placement, delineate the basic responsibilities and obligations of the student, college, and internship/co-op site to each other for a productive learning experience, as well as protect all parties against undefined risks in experiential education and work-based learning programs.

#### Guidelines

Both documents should be signed by all designated parties at the beginning of the internship/coop experience. These documents are also designed to incorporate flexibility for each of the Colleges to substitute more appropriate terminology, in accordance with the unique needs of their individual experiential education programs. Practitioners and administrators will find it helpful to reference the Legal Documents Administrative Guidelines (Appendix A-1) for more information on the details of the documents, section-by-section, and guidelines for appropriate content modifications in implementing for use on individual campuses.

### **Records Management**

Educational institutions are subject to a variety of statutes and regulations that require records retention and protect student privacy including the Massachusetts Public Records Law, FERPA, Civil Rights laws, and the Americans with Disabilities Acts. It is suggested that internship and co-op practitioners keep records for five (5) years following the student's separation from the College, including signed copies of the MCC Internship/Co-op Agreement(Appendix A-2) and MCC Internship/Co-op Acknowledgement of Risk and Consent (Appendix A-3) legal documents. The designated administrator on each campus shall consult the Commonwealth of Massachusetts' Statewide Record Retention Schedule when establishing a record retention policy. The designated administrator should be consulted for further advice and support.



### **Liability Insurance Requests**

Coordinators of internship or cooperative education programs can expect to be approached by employers, students, or faculty to respond to questions of professional liability insurance and risk:

### Student Liability Risk:

Some host organizations may require that student interns have professional liability or malpractice insurance as an additional layer of protection for harm or loss caused by the student's negligence, errors or omissions, particularly in unpaid internship/co-op's. Practitioners and administrators should be aware that in general the Massachusetts Community Colleges do not currently provide blanket professional liability coverage for students serving in an internship or co-op experience, and students should be informed accordingly. As such, practitioners cannot provide Evidence of Coverage or sign off on Indemnity Agreements.

Each community college may review and determine whether providing students with insurance protection for internship or co-op field experiences is advisable under the particular circumstances. Community colleges that require students to purchase liability insurance or which assess a fee for obtaining insurance on behalf of a student should broadly publicize these requirements in the course catalog and related internship or co-op course materials.

### **Practitioner Liability Risk:**

Faculty practitioners and administrators of community colleges are afforded general immunity protection as employees of the Commonwealth of Massachusetts under state law (Chapter 258) for professional liability. Even so, practitioners should not make any representations to the host site of the quality of a student's work or assume any risks on behalf of either a student intern or the host site.

### 4. Family Educational Rights and Privacy Act (FERPA)

Internship and co-op practitioners should be aware of federal regulations that pertain to educational recordkeeping and student privacy. The Family Educational Rights and Privacy Act (FERPA) of 1974 is a Federal law that protects the privacy of student education records. The law applies to all schools that receive funds under an applicable program of the U.S. Department of Education.

FERPA gives parents certain rights with respect to their children's education records. These rights transfer to the student when he or she reaches the age of 18 or attends a post-secondary educational institution.

FERPA affords students the right to inspect and review their educational records or request amendment where students believe information is inaccurate or misleading. It also affords students the right to consent to disclosures of personally identifiable information contained in student education records, except to the extent that FERPA authorizes disclosure without consent, as in disclosure to school officials with legitimate educational interests.

For more information, please consult the Federal Department of Education's Family Policy Compliance Office at <a href="http://www2.ed.gov/policy/gen/guid/fpco/index.html">http://www2.ed.gov/policy/gen/guid/fpco/index.html</a> listed in the Works Cited.



### 5. Internship Programs under the Fair Labor Standards Act (FLSA)

There has been an increasing trend in the growth of unpaid internships/co-op in this nation in recent years and partially stimulated by the economic downturn. Practitioners have also noted an increasing trend of employers seeking to offer 'academic credit' in exchange for 'compensation' (NACE 2010). Practitioners may sometimes advise employers that the student has to pay for the course credit, which is not a form of compensation particularly if it is not an elective in their program requirements. But for an unpaid intern in the private sector to truly be considered an intern and not an employee (and therefore not entitled to comparable wages in the for-profit sector), there are established policies from the federal government.

In April 2010, the U.S. Department of Labor published an update regarding Internship (Co-op) Programs under the Fair Labor Standards Act, the first update since the original apprenticeship set-ups in 1967 (U.S. Department of Labor, 2010). Of key note is that the experience must be for the 'educational benefit' of the student. Practitioners need to be familiar with these latest standards in communicating with students and employers on the viability of unpaid internships/co-op in the private sector and how they relate to an academic setting or internship/co-op program development.

Fact Sheet #71: "Internship Programs under the Fair Labor Standards Act" (Appendix H) may be consulted for further details. A summary of key information reproduced in part from this Fact Sheet follows:

### **Six-prong 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 following six criteria must be applied when making this determination:

- 1. The internship (co-op), 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 (co-op) 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 (co-op).
- 6. The employer and the intern understand that the intern is not entitled to wages for the time spent in the internship (co-op).

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 (p.1).

For additional information, please consult the U.S. Department of Labor Wage and Hour Division website <a href="https://www.wagehour.dol.gov">www.wagehour.dol.gov</a> as listed in the Works Cited.



### 6. Access and Equal Employment Opportunity

In order to comply with state and federal law, the college seeks to provide equal educational and employment opportunities and does not discriminate on the basis of age, ancestry, color, creed, disability, genetic information, gender, marital status, race, religion, national origin, veteran status, or any other protected classes. The college seeks to work only with employers who operate in compliance with state and federal antidiscrimination laws. If an employer acts in any manner that constitutes a discriminatory practice, the college shall immediately terminate its relationship with the employer.

Internship and co-op programs may also be called upon to provide proof of compliance with Civil Rights and Disabilities or other laws as it relates to student and employer access and participation through their various materials, websites, and documentation. As a result of a 2010 - 2011 Federal Perkins audit, a non-discrimination clause that is signed by both the college and the host site has been included in the bulleted responsibilities of the MCC Internship/ Co-op Agreement (Appendix A-2).



### Appendix A-1: MCC Legal Documents- Administrative Guidelines

### MASSACHUSETTS COMMUNITY COLLEGES

### Internships and Co-ops: Liability and Risk Consent Legal Documents - Administrative Guidelines

### **Approved Legal Documents**

The MCC Internship/Co-op Agreement and MCC Internship/Co-op Acknowledgement of Risk and Consent documents were developed and finalized in consultation with the Community Colleges' General Counsel's Office, as they pertain to an internship/co-op student in a credit-bearing experience.

### **Purpose**

In combination, these documents are designed to clearly define the terms of the internship/co-op placement, delineate the basic responsibilities and obligations of the student, college, and internship/co-op site to each other for a productive learning experience, as well as protect all parties against undefined risks in experiential education and work-based learning programs.

### **Timeframe**

If students are being permitted to enter a workplace for a credit-generating experience, all stakeholders need to be in agreement on the terms of the experience before it begins.

MCC Internship/Co-op Acknowledgement of R&C- Signed by student before first day of site placement MCC Internship/Co-op Agreement- Signed by all parties by first day of site placement

### Practitioner Guidelines for the MCC Internship/Co-op Agreement (Appendix A-2)

The **MCC Internship/Co-op Agreement** is a three-way agreement between the student, the college, and the host site, to be signed for each individual student **by the first day** of the site placement.

It is also designed to incorporate flexibility for each of the colleges to substitute more appropriate terminology, in accordance with the unique needs of their individual experiential education programs. Each college should add appropriate contact information to the document.

### I. Appendix of Terminology:

Key places for terminology substitutions are delineated by *italicized text* in parentheses. Following is a general list for sample substitutions:

(Internship) - Co-op, Cooperative Education, etc.

(Faculty) - Faculty Advisor, Faculty Mentor, Co-op Faculty, Co-op Advisor, etc.

(Coordinator) - Internship Coordinator, Co-op Coordinator, Co-op Placement Coordinator, etc.

### II. Review of Sections:

1. **General Information** (Part A: Student, Part B: Faculty/ College, and Part C: Site Supervisor):

**Description** These sections include basic contact information for the student, faculty, coordinator, and site supervisors, academic enrollment information, and terms of student internship/co-op placement including timeframes and compensation.

**Objective** This information is important to capture appropriate points of contact for general communication purposes and in case of emergency, as well as to establish general academic and host site integrity for the internship or co-op placement.

It is recommended that the integrity of these sections be maintained-no content modifications.

2. **Student, College, and Site Supervisor Responsibilities** (Part A: Student, Part B: Faculty/ College, and Part C: Site Supervisor):

**Description** These sections outline the key ethical and professional roles and responsibilities for the student, faculty, coordinator or college representative, and host site supervisor to each other throughout the duration of the internship/co-op placement experience.



**Objective** This information is important to obtain agreement for expectations of professionalism, reasonable and achievable learning outcomes, availability of work hours, faculty and site supervisor mentoring, consultation for addressing or resolving any site issues.

It is recommended that the integrity of these sections be maintained-no content modifications.

### 3. **Learning Outcomes:** (Part A: Student)

**Description** This section outlines key academic learning outcomes for the internship or co-op experience, in accordance with nationally defined experiential education and CAS standards. The six listed learning outcomes encompass career, professional, personal, technical, theoretical, and analytical skills that are relevant for the student internship experience in any academic discipline.

**Objective** This information is important to serve as guidelines for the academic credibility and transferability of the internship/co-op course, as well as to set specific academic or individual student learning objectives for assessment and evaluation.

It is recommended that the integrity of this section be maintained-no content modifications.

### 4. **Learnina Obiectives:** (Part A: Student)

**Description** The specific learning objectives to the internship or co-op placement should be developed by student, in consultation with the faculty and site supervisor. The faculty and student acknowledge responsibility to work together in setting measurable objectives, and the site supervisor acknowledges responsibility to work with the student in approving the match of the specific objectives to available and relevant work projects.

**Objective** This information is important to establish the credibility and appropriateness of the internship/ co-op placement for the achievement of the learning outcomes. If the College is permitting a student to enter a workplace for a credit generating experience, then all stakeholders need to be in agreement on the terms of the experience before it begins, or very soon thereafter.

It is recommended that any modifications to this section only be to improve the strength of academic content. For example, listing five Learning Objectives may be expanded upon with a plan of action/proof of result either in this section or in a separate Learning Agreement.

### 5. Academic Criteria: (Part B: Faculty/ College)

**Description** This section outlines the basis for award of college credit, including the required number of internship or co-op hours, all academic assignments and meetings, method of evaluation, and frequency of contact between student and faculty.

**Objective** This information is important for establishing the academic integrity of the internship or co-op learning experience for the College, student, and host site, and award of standard college credit, including adequate academic oversight, support, and opportunity for student disclosure of issues or concerns.

It is recommended that the integrity of these sections be maintained-no content modifications.

### 6. Academic Dean or Designee signature: (Part B: Faculty/ College)

**Description** On some campuses, the Internship or Co-op Coordinator may serve as the sole designee. On other campuses, an additional Academic Designee signature may be required, such as the Associate Dean of the Department.

**Objective** This signature is important in order to establish review that the proposed internship/co-op site will provide opportunity to satisfy the academic objectives and comply with general college standards and practices.



The present statement is recommended to be sufficient, but Academic Deans on individual campuses may further be consulted.

## <u>Practitioner Guidelines for the MCC Internship/Co-op Acknowledgement of Risk and Consent</u> (Appendix A-3)

The MCC Internship/Co-op Acknowledgement of Risk and Consent is a two-way agreement between the student and the College, to be signed for each individual student **before the first** day of the site placement.

For Student Waiver purposes, internships and co-ops are treated the same as off-campus student field trips, conferences, service learning or alternative spring break trips coordinated by faculty or staff of the Massachusetts Community Colleges.

### I. Appendix of Terminology:

Key places for terminology substitutions are delineated by *italicized text* in parentheses. Following is a general list for sample substitutions:

(Internship) - Co-op, Cooperative Education, etc.

(Faculty) - Faculty Advisor, Faculty Mentor, Co-op Faculty, Co-op Advisor, etc.

(Coordinator) - Internship Coordinator, Co-op Coordinator, Co-op Placement Coordinator, etc.

### II. Review of Sections:

### 1. Internship/Co-op Activities Description: (Section I)

**Description** The internship or co-op job description should be clearly referenced. This section should reflect the same detailed listing of job activities as listed on the Part C. Site Supervisor section of the MCC Internship/ Co-op Agreement.

**Objective** Generally, a liability waiver is only as good as it is detailed. A liability waiver may be unenforceable if the student signs it without notice of what the internship/co-op main activities will be.

It is recommended that the integrity of these sections be maintained-no content modifications.



## Appendix A-2: MCC Internship/Co-op Agreement

# MASSASCHUSETTS COMMUNITY COLLEGES INTERNSHIP/ CO-OP AGREEMENT

General Information				
Student's Name:				
Last	First		Stud	lent ID#
Address:	City	/:	State:	Zip:
Student Phone:	Student Er	nail:		
Academic Major:	& C	oncentration: _		
Course Number:Course	Name:	Credits:	Term:	Year:
Student Responsibilities				
<ul> <li>I will consult with my site agreement.</li> <li>I will perform appropriate supervisor throughout the (i)</li> <li>I will respect and compondidentiality, honesty, puter it will comply with all College hours, completing all acasscheduled times.</li> </ul>	oly with all company rules notuality, professionalism, be ge policies and procedures demic assignments, class a cordinator, and site supervomplete my (internship).  For the student experience are professional communication ganizational structures, culture nnections to academic theoresearch skills, and problem-servers.	d accept performance intended to enter a work setting, and practice solving skills.	regarding, bes. not limited to, /or meeting we cumstances the ncompass all of	back from the site ut not limited to, documenting work with my (faculty) at at may impair my  If the following:
<ul> <li>Establish a network of profes</li> <li>Learning Objectives</li> </ul>				
By the end of this (internship), I p Please consult with your (faculty	_		•	
3				
4				
5				_
The information I have provided recognize that, as an intern fror community. I therefore agree to rules and procedures of the host s	m conduct myself professionally	Community Col	lege, I represei	nt the College to the
Student Name (printed):				
Student Signature:				
46   page			- <u>-</u>	7



PART B. TO BE COMPLETED BY THE (FAC	CULTY)/ COLLEGE: Student's Name:
General Information	
(Faculty) Name:	Title:
Campus Address:	
Phone:	Email:
Academic Criteria	
	it is awarded based on a student working a minimum of 45 hours per credit
	ducational practices. Some programs may require more.
% %	ments and class/ (faculty) meetings are further outlined in Syllabus. daily journal class/ (faculty) meetings final project: (research paper, portfolio, presentation)
%	supervisor evaluations other:
Weekly Student Contact Schedule:	
Established class:	During office hours:
College Responsibilities	
to ensure a productive lead  (Faculty) shall establish a consult with a consult w	stablishing learning objectives, working with the student and site supervisor arning experience.  consistent meeting schedule with the student.  method of grading the student.  the site supervisor regarding the student's performance at least twice  whether a student has satisfactorily completed an (internship) and award a ent's performance, accomplishment of the learning objectives and  radinator) shall assist the student or employer with addressing/resolving arise at the (internship) site.  The learning objectives proposed. I agree to oversee the student's objectives and shall assess his/her performance pursuant to sove at the completion of the (internship) experience.
(Faculty) Simpahuro	Detail
Academic Dean or Designee signal proposed placement will provide program and/ or career goals, sat credits offered are reasonable and compared to the compared	ture required: I have reviewed this document and conclude that the the student with learning opportunities related to his/ her academic isfies the College's academic standards and requirements and that the appropriate upon satisfactory completion of the proposed placement.
Designee Signature:	Date:
(Coordinator),	Community College Campus Address Phone / FAX / Email



	D BE COMPLETED BY SITE SUPERVISOR: Student's Name:
<u>General I</u>	<u>nformation</u>
(Internship	p) Host Site Name:
Site Addre	ess:
Site Super	visor Name: Title:
Site Super	visor's Phone: Email:
(Internship	o) Start Date: to Fulfillhour
Student's	(internship) schedule:
How frequ	uently will the Site Supervisor be meeting with the Student?
Will the stu	udent be compensated during this (internship)? Yes No
If yes, des	cribe:
Job Desci	iption.
	(Internship) host site will assign a site supervisor to oversee the student's (internship) experience. Site Supervisor will review the student's learning outcomes and their related objectives, and modithose objectives as necessary, in order to ensure a productive learning experience. Site Supervisor, working with the student and (faculty) and (coordinator), shall provide a (internship) experience that will enable the student to work toward achieving the learning objectives.  Site Supervisor will meet weekly with the student to discuss the (internship) experience.  Site Supervisor shall consult as necessary with the (faculty) regarding the student's progress and provide a midterm and final evaluation of the student's job performance.  (Internship) site shall provide the student with relevant on-the-job training, including instruction safety procedures and internal workplace guidelines.  (Internship) site shall expect the student to actively participate in work activities which contribute the student's educational training, but the student may not replace a regular paid employee.  (Internship) site shall expect the student to act in a professional manner at all times.  (Internship) site may dismiss a student at any time for performance or behavioral issues. When practicable, the site agrees to consult with the (faculty) and/ or the (coordinator) prior to any suc dismissal decision is made. Site agrees not to discriminate based on a student's race, color, genderage, national origin, religion or disability, in recruitment, hiring, placement, assignment to work task

The (Internship) site agrees to permit the student to participate as an intern pursuant to this agreement. The learning objectives stated herein are realistic and the Site Supervisor shall work with the student to achieve those objectives. The college has made no representations about the quality of the student's work and the college will not be providing on-site supervision of this student during the (internship).

<b>Site Supervisor's Name</b> (printed):	 
Site Supervisor's Signature:	 Date:



## Appendix A-3: MCC Acknowledgement of Risk and Consent

## MASSASCHUSETTS COMMUNITY COLLEGES INTERNSHIP/ CO-OP ACKNOWLEDGEMENT OF RISK AND CONSENT

SECTION I (TO BE COMPLETED BY STUDENT AND REVIEWED BY FACULTY)
(Internship) Site:
(Faculty) Name:
(Internship) Activities include but are not limited to:
<u> </u>
SECTION II (TO BE COMPLETED BY THE STUDENT)  I understand that there are certain dangers, hazards and risks that may be associated with my participation in the (internship) activity(s) described above. I further understand that all risks cannot be prevented. I have considered the risks associated with participating in this (internship) and knowingly and voluntarily assume all such risks. Furthermore, I represent that I am physically and mentally capable of participating in this (internship) and that I am capable of using the equipment, if any, associated with the (internship).
On behalf of myself, and my family, heirs, assigns, and personal representatives, I hereby agree to indemnify, hold harmless, release from liability and waive any legal action against the College, its governing board, officers, agents and employees (collectively, "the Released Parties") for any personal injury, death, or property damage I may suffer or cause to a third party arising out of or in any way connected to my participation in the (internship) or while in transit to or from said (internship).
I represent that I am covered by adequate medical/health/accident insurance for any injury that I may suffer at the (internship) site. In the event I require medical services due to an injury suffered during the (internship), I understand and agree that the College does not provide medical services or medical personnel at the (internship) site and is under no obligation to provide transportation for me to obtain medical services.
I understand and agree that this document shall be construed in accordance with the laws of the Commonwealth of Massachusetts. If any term or provision of this document shall be held invalid or unenforceable, the remaining terms and provisions shall remain in full force and effect. I understand that by signing this document I am representing that I have read and understand all of its terms and conditions and that I fully intend to be bound by the same. I also understand that I may wish to consult with an attorney prior to signing this document.
Student's Name:
Student's Signature:
Date:



## **Appendix B: Student Checklist**

## MASSASCHUSETTS COMMUNITY COLLEGES Student Internship/Co-op Checklist

Satisfying	ying the terms of the Internship/Co-op  Student Name:	
Pre-Inter		
	Review eligibility requirements or course pre-requisites for your major	
	Schedule and attend an Internship/Co-op Orientation or meet with Faculty/Coordin	nator to obtain
	approval for participation	
	☐ Register for Internship/Co-op course (requires sign-off to register)	
	☐ Develop and submit a resume to begin interview/ placement process	
	☐ Interview and secure Internship/Co-op site	
	☐ Obtain job description from Site Supervisor	
	☐ Obtain approval from Faculty/Coordinator for Internship/Co-op site	
	☐ Create a work schedule with Site Supervisor	
	$\square$ Plan your next semester personal and academic schedules to prepare to work the s	cheduled hours
At Start o	art of Internship  Sign Student MCC Acknowledgement of Risk and Consent	
		pervisor
_		
	Coordinator	301, 311.13
During In	g Internship	
	5, 11 J	
	Fulfill learning objectives indicated on your MCC Internship/Co-op Agreement through	ghout your work
	experience	
	☐ Complete assignments and tasks required by your Faculty and Site Supervisor	
	☐ Complete required number of internship/co-op hours and submit completed timesh	neets to Faculty
	Coordinator	
	☐ Complete final Student Evaluation of Internship/Co-op Site	
Due Date	Dates	
	□ Submit MCC Internship/Co-op Agreement to faculty coordinator with your signature	e and signatures
	you've obtained from Faculty Coordinator and Site Supervisor	
	□ Submit Student Time Sheet to Faculty Coordinator with Site Supervisor's signature	
	□ Submit Student Evaluation of MCC Internship/Co-op site	



### **Appendix C: Sample Syllabus**

### MASSASCHUSETTS COMMUNITY COLLEGES Internship/Co-op Course Syllabus (Course Title)

Faculty Member:		
Office:		
Office Hours:		
Phone:	Email:	

### **COURSE DESCRIPTION**

A one to three-credit course that offers students an opportunity to learn in work settings while obtaining practical experience in their field of study so to apply and reflect on the connections to academic theory and practice. Students will work a minimum of 45 hours per one credit hour and complete weekly assignments to develop workplace communication skills, gain an understanding of industry and organizational structures, cultures, and ethics, strengthen critical thinking, research and problem solving skills, establish networks and develop a greater awareness and appreciation of self, others and social responsibility in a work, career and global context.

#### **PURPOSE**

Offers the potential for valuable experiential education opportunities that can't be replicated in the traditional classroom setting, and serves as a bridge between the professional and academic worlds to which the student aspires. It offers the opportunity for hands-on skills development under the guidance of a faculty/employer mentor, testing of academic theory in practice, sampling of a career path before further education, resume development and building a network of professional contacts.

### **PREREQUISITES**

Students must be sophomore status (24 credits), have a minimum of three courses in their major and have a GPA 2.0 or higher. Students with GPA's lower than 2.0 must have written recommendation of appropriate faculty and academic deans or senior administration to apply for participation.

### **COURSE OBJECTIVES/LEARNING OUTCOMES**

Academic learning outcomes for the student (internship) are intended to encompass all of the following:

- Develop technical skills and professional communications in a work setting.
- Understand industry and organizational structures, culture, and ethics.
- Apply and reflect on the connections to academic theory and practice.
- Strengthen critical thinking, research skills and problem solving skills.
- Develop a greater awareness and appreciation of self, others, and social responsibility in a work, career, and global context.
- Establish a network of professional contacts, mentors, and references.

### **COURSE STRUCTURE**

A regularly scheduled seminar or faculty meetings are set to develop learning goals, review strategies to improve work performance, evaluate work performance and assess learning outcomes, address the student's concerns and answer student questions. There will be reading assignments, writing assignments, and class discussions.



### COURSE STRUCTURE (con't)

Students will work a minimum of 45 hours per one credit at their (*internship*) site during the semester. All students will be evaluated by their site supervisor at mid-term and at the end of the semester. Site supervisors will be asked to evaluate the student's performance in writing. A (faculty) and/or (*internship*) (coordinator) will meet with student's site-supervisor to discuss the evaluation at the (*internship*) site. All logistical issues such as transportation, access to services and resources must be discussed with the (faculty) and/or (*internship*) (coordinator) prior to the start of the field experience.

### **ATTENDANCE POLICY**

Attendance at class meetings is mandatory unless other arrangements have been made with the instructor in advance. Work attendance is a reflection of the professionalism and performance expected of interns. All students must meet the total hour course requirement as well as meeting all time commitments they have made to their internship site. Please remember that you are representing the College to the industry.

### **ROLES AND RESPONSIBILITIES**

Students are required to complete all required internship documents and submit on time. The roles and responsibilities required for students, site supervisors, faculty, and/or coordinators are detailed on the MCC Internship/ Co-op Agreement for each party.

- 1. MCC Internship/ Co-op Acknowledgement of Risk and Consent sign before start of internship
- 2. MCC Internship/Co-op Agreement-sign on 1<sup>st</sup> day of internship and deliver back within 1 week

Students are responsible for developing five (5) key learning objectives in consultation with their faculty advisor and in review of their job description with their site supervisor. These learning objectives can be monitored by all parties throughout the course, adjusting as necessary, and assessed at midterm and at the end of the internship/co-op experience. These learning objectives are also required to be listed in the legal MCC Internship/Co-op Agreement document.

### **SPECIAL ACCOMMODATIONS**

Students with documented disabilities (physical, emotional, learning and/or others) who believe that they may need accommodations for this course are encouraged to contact the Counselor for Students with Disabilities in Room \_\_\_\_, extension \_\_\_\_, as soon as possible to ensure that such accommodations are implemented in a timely fashion.

If you are a student who would normally seek accommodations in a traditional classroom, please alert the faculty advisor and/or (internship) coordinator before the beginning of the second class session.

### GRADING CRITERIA & EVALUATION (Faculty may include and assign % weight to the following criteria):

- MCC Internship/Co-op Agreement and development of learning objectives
- Daily journals/weekly reflection questions
- Final project: (research paper, career portfolio, presentation)
- Class discussion, attendance, and/or meetings with Faculty Advisor
- Written and oral assignments (resume development, cover letter, company research, skills assessment, letter of recommendation, informational interview, workplace scenarios)
- Evaluation of student's performance by site supervisor



## Appendix D-1: Site Supervision Evaluation

# MASSASCHUSETTS COMMUNITY COLLEGES Site Supervisor Evaluation of Student Progress

I.D. No:		Company: Supervisor: Coordinator:							
							ht of each category. Please use the	ording to the following scale, indicating the ranking comments section at the bottom for clarificati	
						<ul> <li>5 - Outstanding - Performance is exceptional in all areas and is clearly superior to others.</li> <li>4 - Very Good - Results clearly exceed most position requirements. Performance is of high quality and is achieved on a consistent basis.</li> </ul>		<ul> <li>3 - Good - Competent levels of performance that consistently meet job standards.</li> <li>2 - Improvement Needed - Performance is deficient in certain areas and improvement is needed.</li> <li>1 - Unsatisfactory - Results are generally unacceptable and require immediate improvement.</li> </ul>	
Communication:	Demonstrates the ability to speak, liste	n, read, and write performing job tasks							
Problem Solving:	Identifies problems, understands their of	context, and develops workable solutions							
Decision-Making:	Demonstrates the ability to learn and make decisions necessary to complete job tasks successfully								
Organization/Time Management:	Completes assigned tasks from start to finish by gathering, organizing, and evaluating information as necessary, and using good time management skills								
Professionalism:	Meets workplace standards on confidentiality, flexibility, appearance, and making good impression								
nteractions with Others:	Works professionally and respectfully with a diversity of co-workers, supervisors, and co-workers, resolving conflicts in a constructive manner								
Quality of Work:	Performance of tasks is of high quality	-generally error free or with few errors							
All aspects of Organization/Industry:	Understands the dynamics of the organ and the role of the business within the	nization, including health & safety issues,							
Attendance/Punctuality	Maintains consistently excellent record being absent or late and always with n								
Attitude:	Shows enthusiasm and a positive attitude for the job and in successfully completing all assigned tasks								
Comments:									
EVALUATOR SIGNATURE	:								
lave you discussed this	evaluation with the student? Yes	No							



### Appendix D-2: Self-Evaluation

## MASSASCHUSETTS COMMUNITY COLLEGES Student Self-Evaluation

Student:  I.D. No:  Semester:		Company: Supervisor:			
			of each category. Please use	rding to the following scale, indicating the comments section at the bottom	
or expansion or any	<del>-</del>	NTIFICATION			
areas and is clearly sur <b>4 - Very Good</b> - Results	clearly exceed most position nance is of high quality and is	<ul> <li>3 - Good - Competent levels of performent job standards.</li> <li>2 - Improvement Needed - Perform certain areas and improvement is not a competent in the competent in</li></ul>	nance is deficient in eeded.		
This rating sheet is u	used to evaluate your perform	nance and to help you improve future	performance.		
Communication:	Demonstrates the ability to speak, l	listen, read, and write performing job tasks			
Problem Solving:	Identifies problems, understands th	eir context, and develops workable solutions			
Decision-Making:	Demonstrates the ability to learn ar job tasks successfully	nd make decisions necessary to complete			
Organization/Time Management:		t to finish by gathering, organizing, and y, and using good time management skills			
Professionalism:	Meets workplace standards on cont making good impression	fidentiality, flexibility, appearance, and			
Interactions with Others:	Works professionally and respectfus upervisors, and co-workers, resolv	ally with a diversity of co-workers, ving conflicts in a constructive manner	<del></del>		
Quality of Work:	Performance of tasks is of high qua	ality-generally error free or with few errors			
All aspects of Organization/Industry:	Understands the dynamics of the or and the role of the business within	rganization, including health & safety issues, the community			
Attendance/Punctuality	Maintains consistently excellent re	ecord of attendance and punctuality, rarely			

being absent or late and always with notification

completing all assigned tasks

Comments:

Student Signature:

Shows enthusiasm and a positive attitude for the job and in successfully



Attitude:

## Appendix D-3: Student Evaluation of Internship/Co-op Site

# MASSASCHUSETTS COMMUNITY COLLEGES Student Evaluation of Internship/Co-op Site

Student Name:	Date:			
Program of Study:	Faculty Supervisor:			
Placement Site:	Work Period:			
Supervisor's Name:	Department:			
<b>INSTRUCTIONS:</b> This evaluation will be important in determined and for students in future internship/co-op assist should be honest, objective, and should indicate probinternship/co-op period.	gnments with the same employer. The evaluation			
PLACEMENT:				
Educational Value or Merit of Assignment:  Exceptional Opportunity Worthwhile Experience Satisfactory Needs Development* (please comment below)	Did Position Live Up to the Original Description?  Exact Match of Original Description  Very Closely Matched Description  Somewhat Matched Description  No Relationship At All * (please comment below)			
Salary Paid in Relation to Job Requirements, Experience, and Academic Training:  Excellent Very Good Average Unpaid Internship/Does Not Apply	Supervisor's Reception to New Ideas?  Excellent Very Good Average Needs Development* (please comment below)			
Relationship with Supervisor/Management:  Excellent Very Good Average Needs Development* (please comment below)	Was Your Supervisor Available When You Needed?  Always Available Sometimes Available Rarely Available Never Available/Sought Help Elsewhere* (please comment below)			
Opportunities to Relate With Other Company Personnel: Open, Friendly and Supportive Atmosphere Opportunity was not presented	How Well Did Position Relate to Your Personal Career Goal?  Excellent Very Good Average Needs Development* (please comment below)			
Describe how your placement related to your acade	emic courses?			
*Comments:				



## Appendix D-4: Host Site Evaluation of Internship/Co-op Program

## MASSASCHUSETTS COMMUNITY COLLEGES Host Site Evaluation of Internship/Co-op Program

Company Name:	Date:
Contact Name:	Contact Phone Number:
Fax Number :	E-mail Address:
How would you rate your experience with the in	ternship/co-op process? (including department staff,
placement, site visits, paperwork, etc.)	
Excellent Very G	ood Average Needs Development
What worked well?	
How could we improve the process?	
Will an internship/co-op position be available at *If yes, please fill out remainder of this form:	your organization for next semester? Yes* No
Position Title:	Number of openings:
Schedule:	
Wage/salary:	
	Employment end date:
Contact:	
Job Description:	
Job Qualifications:	
	_
Applicant Instructions:	



## Appendix D-5: Student Evaluation of Internship/Co-op Program

## MASSASCHUSETTS COMMUNITY COLLEGES Student Evaluation of Internship/Co-op Program

Student Name:		Date:			
Program of Study:		Faculty Supervisor:			
Placement Site: Supervisor's Name:		Work Period:			
Please rate the following services: (circle one)	Very Satisfied	Satisfied	Neutral	Dissatisfied	Not Applicable
☐ Application Process	1	2	3	4	n/a
□ Placement Assistance	1	2	3	4	n/a
□ Availability of Staff	1	2	3	4	n/a
□ Catalogue & Course Description of Internship/Co-op	1	2	3	4	n/a
□ Seminar (Classroom Component of Internship/Co-op)	1	2	3	4	n/a
□ Internship/Co-op Career Web Resources	1	2	3	4	n/a
□ Availability of Forms on-line	1	2	3	4	n/a
<ul> <li>More focused about personal career goals</li> <li>Better skills in the workplace</li> <li>More confident with your ability to interview</li> <li>More knowledge about job search techniques</li> <li>More professional communication and interpersonal skills</li> <li>Improved Resume</li> <li>Better life skills (for example, time and stress management)</li> </ul>	1 1 1 1 1 1	2 2 2 2 2 2 2 2	3 3 3 3 3 3 3	4 4 4 4	n/a n/a n/a n/a n/a n/a n/a n/a n/a
3. Which of the following outcomes have you experienced (circle one)	as a result	of your in	ternship/c	o-op positio	on?
Have gained experience in my career field				Y	N
Received a job offer				Υ	N
Received a job promotion				Y	N
Decided to change career fields				Y	N
Received an award or recognition for work done				Y	N
4. Are you planning to pursue additional education upon c co-op program?	ompletion	of the inte	ernship/	Υ	N
If yes:  ☐ Associate ☐ Bachelor ☐ Masters ☐ ☐ Did Internship/Co-op play a role in your decision? If so	Other: o, what rol	le did it pla	akś	_	



### CO-OP/INTERNSHIP PROGRAM/PROCESS:

How would you rate your experience with the Cooperative Education/Internship Process (including department staff, placement, co-op faculty, etc.)?						
□ Excellent	□ Very Good	□ Average	□ Needs Development			
What worked well?						
How could we improve	the process?					
_						
Additional Comments:						



### Appendix E: Learning Outcomes & Objectives Toolkit

## MASSACHUSETTS COMMUNITY COLLEGES Sample Learning Outcomes & Objectives Toolkit

### Introduction

This toolkit was designed to assist practitioners and students in designing appropriate and measurable learning objectives. The MCCEE Committee has identified six key learning outcomes, which take into account the standards and guidelines set forth by both the CAS Standards (Appendix F) and the NSEE Eight Principles for Good Practice (Part I. Pedagogy: Section 2) which include intention (purposefulness that enables experience to become knowledge), preparedness and planning, authenticity, reflection, orientation and training, monitoring and continuous improvement, assessment and evaluation and acknowledgement (recognition of progress and accomplishment).

### **Learning Outcomes**

Academic learning outcomes for the student experience are intended to encompass all of the following:

- Develop technical skills and professional communications in a work setting.
- Understand industry and organizational structures, culture, and ethics.
- Apply and reflect on the connections to academic theory and practice.
- Strengthen critical thinking, research skills, and problem-solving skills.
- Develop awareness of self, others, and social responsibility in a work, career, and global context.
- Establish a network of professional contacts, mentors, references.

### **Developing & Assessing Learning Objectives, Associated Activities**

Four key elements ensuring a successful experience are:

- 1. Goal setting (goals should include industry knowledge, skills to develop, application to academic theory, reflection on relevance of education, prior life experience and future aspirations as well as communications to transpire) by:
  - Student
  - Faculty Advisor
  - Employer
- Objectives
  - Must be based on goals
    - 1. What does the student want to learn and how will it change him/her?
    - 2. How will the student learn it?
    - 3. How will the student demonstrate the learning?
  - Must be relevant
  - Must be prioritized
  - Must be dynamic (modify when and if necessary)
- Activities
  - Must support objectives
  - Will be developed from formal and informal resources
- 4. Assessment
  - Development of learning objectives
  - How the student meets those objectives
  - How the student demonstrates/presents learning



Learning Outcome	Activities	Assessment			
1. Develop technical skills and professional communications in a work setting.					
Develop information research and management skills	Acquire and evaluate information through reading, research and interviews	Journal/ Interview reports Portfolio documenting sources			
	☐ Organize and maintain information using database and spreadsheet technologies	Review quality of work samples			
	<ul> <li>Interpret and communicate information through written summaries</li> </ul>	Review quality of summaries			
Demonstrate ability to apply objectives and technological	<ul> <li>Select appropriate technology through research and interviews with IT- experienced professionals</li> </ul>	Review of quality/relevancy			
skills	Using appropriate applications, apply technology to task	Review of worksite project			
Develop awareness of and	Conduct interviews to practice listening skills	Feedback from interviewees			
apply appropriate professional communications	Present orally, work in team setting, develop appropriate customer service skills	Feedback from audience, team Feedback from management			
	<ul> <li>Develop communication documents, such as resume and cover letter through career development workshop, and other samples of written documents relating to the internship to create a portfolio</li> </ul>	Evaluation of portfolio, resume or cover letter			
2. Understand industry and organiz	cational structures, culture, and ethics.				
Understand the business overview of the organization	□ Study of the organization's mission, core businesses, size and locations	Journal/ presentation/ business brief			
overview of the organization	<ul> <li>Learn the organization's product/ service offering through web site and other organizational communications</li> </ul>	Journal/ presentation/ business brief			
	<ul> <li>Learn about the organizations clients through meetings, interviews, web site and other communications</li> </ul>	Journal/ presentation/ business brief			
Develop knowledge of	Understand the organization's structure through review of organizational charts	Portfolio presentation/ business brief			
organization's structure, culture, values and ethics	<ul> <li>Understand the organization's policies and procedures through review of employee handbooks or operational manuals</li> </ul>	Portfolio presentation/ business brief			
	<ul> <li>Understand the organization's history, leadership team, and community initiatives through review of web site and other organizational communications</li> </ul>	Journal/ presentation/ business brief			
Understand roles and	<ul> <li>Understand the roles and responsibilities of Leaders through review of organizational charts and informational interviews</li> </ul>	Journal/ presentation/ business brief			
responsibilities of employees in organization	Understand the roles and responsibilities Mid-managers through interviews, review of web site and other organizational communications	Journal/ Interview reports			
	<ul> <li>Understand the roles and responsibilities Co-workers through interviews, review of web site and other organizational communications</li> </ul>	Journal/ Interview reports			
Develop knowledge of	Understand the career paths from entry level to senior positions through interviews,	Journal/ Interview reports			
relevant organizational career paths	review of web site and other organizational communications  Understand corresponding educational and time-in-position requirements through interviews, review of web site and other organizational communications	Journal/ Interview reports			



3. Apply and reflect on the con	nections to academic theory and practice.	
Develop an appreciation for the relevance of education	readings, reflection	Journal/Reflection Assignments/ Personal Career and Education Plan
	· · · · · · · · · · · · · · · · · · ·	Journal/Reflection Assignments/ Group presentations
	Review wage and salary information to understand life style implications	Journal/Reflection Assignments
Develop knowledge of	☐ Understand the needs of society through readings and reflection .	Journal/Reflection Assignments
interrelationship between education and work; how each contributes to the economy and society	☐ Understand the functions of the economy through readings and research	Journal/Reflection Assignments
		Journal/Interview Reports/ Reflection Assignments
	<ul> <li>Understand the relevance of internship to career planning and career management through career development workshop, readings and interviews</li> </ul>	Journal/Reflection Assignments
Demonstrate the application of knowledge and skills to practical issues within the organization	☐ Understand the role of research through involvement in worksite project .	Journal/ Evaluation of project
	· · ·	Evaluation of surveys/ data Meeting summaries/ Journal
	☐ Understand the role of decision making through involvement in worksite project [	Evaluation of project
	search skills and problem solving ability.	
Demonstrate ability to think critically and solve problems		Journal/Business brief analysis Final Presentation
		Journal/Final evaluation of project Portfolio presentation
Demonstrate ability to locate information relevant to issue(s) and apply		Journal/Reflection Assignments Oral presentation
	<ul> <li>Understand how to compile information through lecture, research, and meetings with co-workers /supervisor</li> </ul>	Oral presentation/ Portfolio
	<ul> <li>Understand how to format information through lecture, research, and meetings with co-workers / supervisor</li> </ul>	Written report/ Portfolio
	co-workers / supervisor	Class discussions/ Group presentation Supervisor Performance Feedback
Apply adaptive expertise to develop creative solutions		Evaluation of project/ Journals  Case scenario presentation



5. Develop greater awareness and	d appreciation of self, others and social responsibility in work, career and global context.	
Develop attitudes, behavior, knowledge and skills that	Study identity formation though orientation, career development workshop and personality assessment	Journal/ Reflection assignments Class discussions
promote positive esteem	□ Understand how to accept personal responsibility for actions through worksite project	Journal/ Reflection assignments/ Case study Midterm and Final Evaluations
	□ Understand the concept of self-direction and exhibit through worksite project	Written learning objectives Midterm and Final Evaluations
Demonstrate ability to work with others effectively	<ul> <li>Manage personal and environmental variables through worksite project, team meetings and customer interactions</li> </ul>	Journal/ Reflection assignments/ Case study Midterm and Final Evaluations
	<ul> <li>Demonstrate a respect for diversity through participation in worksite project, team meetings and interdepartmental activities</li> </ul>	Journal/ Reflection assignments/ Case study Midterm and Final Evaluations
Develop an exploratory attitude	Gain experience in other departments through worksite projects	Journal/ Reflection assignments Manager feedback/ portfolio presentations
	Attend meetings of professional associations	Journal/Reflection assignments
	<ul> <li>Network, conduct informational interviews, or shadow other professionals within the organization</li> </ul>	Journal/Reflection assignments Interview reports
Demonstrate an awareness of the value of collaboration	<ul> <li>Attend departmental meetings, have discussions with co-workers and participate in worksite projects</li> </ul>	Journal/ Team Evaluation of project Midterm and Final Evaluations
Understand how cultures/ethnicities may differ and	Study cultural identity through lecture, readings and informational interviews	Journal/Reflection assignments/ Class discussions
identify impact	<ul> <li>Identify impact of cultural differences within the workplace through research and readings</li> </ul>	Journal/Reflection assignments/ Case study
6. Establish a network of profession	nal contacts, mentors and references.	
Understand value of networking and make appropriate professional	Develop ability to discern appropriate networking connections through career development workshop, informational interviews and meetings with supervisor	Career workshop/ Personal Career and Ed Plan Journal/Reflection assignments
connections	Develop and demonstrate ability to communicate appropriately to network through career development workshop	Career workshop/social networking tools/ Manager Feedback and evaluation
	□ Understand how to organize network utilizing contact management system	Portfolio examples- contact systems
	Develop appropriate follow-up skills with network	Portfolio examples - social networking tools
Develop relationships with mentors	Complete appropriate number of informational interviews with potential mentors	Journal/Reflection assignments List of mentors
	☐ Meet at least 3-4 times during internship with faculty advisor	Journal/Meeting participation
Develop strategies to enhance references	<ul> <li>Understand the importance of references by attending orientation and career development workshop</li> </ul>	Career workshop/Journal/ List of references
	<ul> <li>Meet with mid and upper level management on a regular basis to develop reference</li> </ul>	Document meetings/ Journal



### Appendix F: CAS Standards



### Council for the Advancement of Standards in Higher Education

www.cas.edu

# Part 1. MISSION INTERNSHIP PROGRAMS CAS STANDARDS and GUIDELINES

The primary mission of Internship Programs (IP) is to engage students in planned, educationally-related work and learning experiences that integrate knowledge and theory with practical application and skill development in a professional setting. IP must develop, disseminate, implement, and regularly review their mission. Mission statements must be consistent with the mission of the institution and with professional standards. IP in higher education must enhance overall educational experiences by incorporating student learning and development outcomes in their mission.

### Part 2. PROGRAM

The formal education of students, consisting of the curriculum and the co-curriculum, must promote student learning and development outcomes that are purposeful and holistic and that prepare students for satisfying and productive lifestyles, work, and civic participation. The student learning and development outcome domains and their related dimensions are:

Knowledge acquisition, integration, construction, and application

• Dimensions: understanding knowledge from a range of disciplines; connecting knowledge to other knowledge, ideas, and experiences; constructing knowledge; and relating knowledge to daily life

Cognitive complexity

- Dimensions: critical thinking; reflective thinking; effective reasoning; and creativity Intrapersonal development
  - Dimensions: realistic self-appraisal, self-understanding, and self-respect; identity development; commitment to ethics and integrity; and spiritual awareness

Interpersonal competence

• Dimensions: meaningful relationships; interdependence; collaboration; and effective leadership

Humanitarianism and civic engagement

• Dimensions: understanding and appreciation of cultural and human differences; social responsibility; global perspective; and sense of civic responsibility

Practical competence

 Dimensions: pursuing goals; communicating effectively; technical competence; managing personal affairs; managing career development; demonstrating professionalism; maintaining health and wellness; and living a purposeful and satisfying life

See The Council for the Advancement of Standards Learning and Developmental Outcomes statement for examples of outcomes related to these domains and dimensions



Consistent with the institutional mission, Internship Programs (IP) must identify relevant and desirable student learning and development outcomes from among the six domains and related dimensions. When creating opportunities for student learning and development, IP must explore possibilities for collaboration with faculty members and other colleagues.

IP must assess relevant and desirable student learning and development outcomes and provide evidence of their impact on student learning and development. IP must articulate how they contribute to or support students' learning and development in the domains not specifically assessed.

### IP must be:

- integrated into the life of the institution
- intentional and coherent
- guided by theories and knowledge of learning and development
- reflective of developmental and demographic profiles of the student population
- responsive to needs of individuals, diverse and special populations, and relevant constituencies

### Learning goals of IP must:

- Be clear about the educational purpose and expected student learning outcomes of the internship experience
- Encourage the learner to test assumptions and hypotheses about the outcomes of decisions and actions taken, and then weigh the outcomes against past learning and future implications
- Develop and document intentional goals and objectives for the internship experience and measure learning outcomes against these goals and objectives
- Maintain intellectual rigor in the field experience

### IP must:

- Ensure that the participants enter the experience with sufficient foundation to support a successful experience
- Engage students in appropriate and relevant internships that facilitate practical application of theory and knowledge
- Provide the learner, the facilitator, and any organizational partners with important background information about each other and about the context and environment in which the experience will operate
- Articulate the relationship of the internship experience to the expected learning outcomes
- Determine criteria for internship sites and train appropriate internship personnel to ensure productive and appropriate learning opportunities for students
- Ensure that all parties engaged in the experience are included in the recognition of progress and accomplishment



#### Part 3. LEADERSHIP

Because effective and ethical leadership is essential to the success of all organizations, Internship Program (IP) leaders with organizational authority for the programs and services must:

- articulate a vision and mission for their programs and services
- set goals and objectives based on the needs of the population served and desired student learning and development outcomes
- advocate for their programs and services
- promote campus environments that provide meaningful opportunities for student learning, development, and integration identify and find means to address individual, organizational, or environmental conditions that foster or inhibit mission achievement
- advocate for representation in strategic planning initiatives at appropriate divisional and institutional levels
- initiate collaborative interactions with stakeholders who have legitimate concerns and interests in the functional area apply effective practices to educational and administrative processes
- prescribe and model ethical behavior communicate effectively
- manage financial resources, including planning, allocation, monitoring, and analysis
- incorporate sustainability practices in the management and design of programs, services, and facilities
- manage human resource processes including recruitment, selection, development, supervision, performance planning, and evaluation
- empower professional, support, and student staff to accept leadership opportunities
- encourage and support scholarly contribution to the profession
- be informed about and integrate appropriate technologies into programs and services
- be knowledgeable about federal, state/provincial, and local laws relevant to the programs and services and ensure that staff members understand their responsibilities by receiving appropriate training
- develop and continuously improve programs and services in response to the changing needs of students and other populations served and the evolving institutional priorities
- recognize environmental conditions that may negatively influence the safety of staff and students and propose interventions that mitigate such conditions

### Part 4. HUMAN RESOURCES

Internship Programs (IP) must be staffed adequately by individuals qualified to accomplish the mission and goals. Within institutional guidelines, IP must establish procedures for staff selection, training, and evaluation; set expectations for supervision; and provide appropriate professional development opportunities to improve the leadership ability, competence, and skills of all employees.

IP professional staff members must hold an earned graduate or professional degree in a field relevant to the position they hold or must possess an appropriate combination of educational credentials and related work experience.

To facilitate the process of identifying internship sites, professional development of staff and faculty members engaged in IP should include enhancing their ability to:

- identify the compatibility between site needs and student interests
- build relationship with business, organizations, institutions, and other career and professional settings
- establish and maintain collaborative relationships with academic and other units on campus understand career and workforce trends



To ensure goal achievement of the IP experience, the professional development of staff and faculty members engaged in IP should include:

### Development of assessment skills:

- Access previous evaluations of internship sites and make appropriate recommendations as to the learning value of the internship
- Develop, implement, and evaluate internship and learning goals ensure the time commitment for the internship is appropriate
- Ensure that the time spent at internships produces an appropriate balance between the objectives of the site and the learning objectives of the student
- Match the unique needs of students and internship sites

### Proper communication with students:

- Prepare, mentor, and monitor students to fulfill internship requirements according to legal and risk management policies
- Clarify the responsibilities of students, the institution, and internship sites

### **Enhancement of student learning:**

- Engage students in internship experiences to enhance student learning and exposure to career opportunities
- Use active learning strategies that are effective in achieving identified learning outcomes engage students in structured opportunities for self-reflection and reflection on the internship experience
- Sustain genuine and active commitment of students, the institution, and internship sites educate, train, and support students to apply learning from internship experiences to future endeavors

### Management skills:

 Foster participation by and with diverse populations develop fiscal and other resources for program support

Degree or credential seeking interns must be qualified by enrollment in an appropriate field of study and by relevant experience. These individuals must be trained and supervised adequately by professional staff members holding educational credentials and related work experience appropriate for supervision.

Student employees and volunteers must be carefully selected, trained, supervised, and evaluated. They must be educated on how and when to refer those in need of additional assistance to qualified staff members and must have access to a supervisor for assistance in making these judgments. Student employees and volunteers must be provided clear and precise job descriptions, pre-service training based on assessed needs, and continuing staff development. Employees and volunteers must receive specific training on institutional policies and privacy laws regarding their access to student records and other sensitive institutional information (e.g., in the USA, Family Educational Rights and Privacy Act, FERPA, or equivalent privacy laws in other states/provinces or countries).

IP must have technical and support staff members adequate to accomplish their mission. All members of the staff must be technologically proficient and qualified to perform their job functions, be knowledgeable about ethical and legal uses of technology, and have access to training and resources to support the performance of their assigned responsibilities.

All members of the staff must receive training on policies and procedures related to the use of technology to store or access student records and institutional data. IP must ensure that staff members are knowledgeable about and trained in emergency procedures, crisis response, and prevention efforts. Prevention efforts must address identification of threatening conduct or behavior of students, faculty members, staff, and others and must incorporate a system or procedures for responding, including but not limited to reporting them to the appropriate campus officials.



Salary levels and benefits for all staff members must be commensurate with those for comparable positions within the institution, in similar institutions, and in the relevant geographic area.

IP must maintain position descriptions for all staff members. To create a diverse staff, IP must institute hiring and promotion practices that are fair, inclusive, proactive, and non-discriminatory.

IP must conduct regular performance planning and evaluation of staff members. IP must provide access to continuing and advanced education and professional development opportunities.

### Part 5. ETHICS

Persons involved in the delivery of Internship Programs (IP) must adhere to the highest principles of ethical behavior. IP must review relevant professional ethical standards and develop or adopt and implement appropriate statements of ethical practice. IP must publish these statements and ensure their periodic review by relevant constituencies. IP must orient new staff members to relevant ethical standards and statements of ethical practice.

IP staff members must ensure that privacy and confidentiality are maintained with respect to all communications and records to the extent that such records are protected under the law and appropriate statements of ethical practice. Information contained in students' education records must not be disclosed except as allowed by relevant laws and institutional policies. IP staff members must disclose to appropriate authorities information judged to be of an emergency nature, especially when the safety of the individual or others is involved, or when otherwise required by institutional policy or relevant law.

IP staff members must be aware of and comply with the provisions contained in the institution's policies pertaining to human subjects' research and student rights and responsibilities, as well as those in other relevant institutional policies addressing ethical practices and confidentiality of research data concerning individuals.

IP staff members must recognize and avoid personal conflicts of interest or appearance thereof in the performance of their work. IP staff members must strive to insure the fair, objective, and impartial treatment of all persons with whom they interact.

When handling institutional funds, IP staff members must ensure that such funds are managed in accordance with established and responsible accounting procedures and the fiscal policies or processes of the institution.

Promotional and descriptive information must be accurate and free of deception. IP staff members must perform their duties within the limits of their training, expertise, and competence. When these limits are exceeded, individuals in need of further assistance must be referred to persons possessing appropriate qualifications.

All IP faculty and staff members responsible for supervising internship activities must monitor student performance and alter placements as needed.

IP staff members must use suitable means to confront and otherwise hold accountable other staff members who exhibit unethical behavior.

IP staff members must be knowledgeable about and practice ethical behavior in the use of technology.

### Part 6. LEGAL RESPONSIBILITIES

Internship Programs (IP) staff members must be knowledgeable about and responsive to laws and regulations that relate to their respective responsibilities and that may pose legal obligations, limitations, or ramifications for the institution as a whole. As appropriate,



Staff members must inform users of programs and services, as well as officials, of legal obligations and limitations including constitutional, statutory, regulatory, and case law; mandatory laws and orders emanating from federal, state/provincial, and local governments; and the institution's policies.

IP staff and faculty members and internship site personnel engaged in internships must be knowledgeable about and responsive to laws and regulations that relate to their respective responsibilities.

IP must have written policies on all relevant operations, transactions, or tasks that may have legal implications.

IP staff members must neither participate in nor condone any form of harassment or activity that demeans persons or creates an intimidating, hostile, or offensive campus environment.

IP staff members must use reasonable and informed practices to limit the liability exposure of the institution and its officers, employees, and agents. IP staff members must be informed about institutional policies regarding risk management, personal liability, and related insurance coverage options and must be referred to external sources if coverage is not provided by the institution.

IP staff members must establish, review, and disseminate safety and emergency company procedures and policies for the work site and accompanying residential facility.

The institution must provide access to legal advice for IP staff members as needed to carry out assigned responsibilities.

The institution must inform IP staff and students in a timely and systematic fashion about extraordinary or changing legal obligations and potential liabilities.

### Part 7. EQUITY and ACCESS

Internship Programs (IP) must be provided on a fair, equitable, and non-discriminatory basis in accordance with institutional policies and with all applicable state/provincial and federal statutes and regulations. IP must maintain an educational and work environment free from discrimination in accordance with law and institutional policy. Discrimination must be avoided on the basis of age; cultural heritage; disability; ethnicity; gender identity and expression; nationality; political affiliation; race; religious affiliation; sex; sexual orientation; economic, marital, social, or veteran status; and any other bases included in local, state/provincial, or federal laws.

IP staff members must select sites that adhere to this non-discrimination standard. Consistent with the mission and goals, IP must take action to remedy significant imbalances in student participation and staffing patterns.

IP must ensure physical and program access for persons with disabilities. IP must be responsive to the needs of all students and other populations served when establishing hours of operation and developing methods of delivering programs and services.

IP must recognize the needs of distance learning students by providing appropriate and accessible services and assisting them in identifying and gaining access to other appropriate services in their geographic region

### Part 8. DIVERSITY

Within the context of each institution's unique mission, diversity enriches the community and enhances the collegiate experience for all; therefore, Internship Programs (IP) must create and nurture environments that are welcoming to and bring together persons of diverse backgrounds.

IP must promote environments that are characterized by open and continuous communication that deepens understanding of one's own identity, culture, and heritage, as well as that of others. IP must



recognize, honor, educate, and promote respect about commonalties and differences among people within their historical and cultural contexts. IP must address the characteristics and needs of a diverse population when establishing and implementing policies and procedures.

### Part 9. ORGANIZATION and MANAGEMENT

To promote student learning and development outcomes, Internship Programs (IP) must be structured purposefully and managed effectively to achieve stated goals. Evidence of appropriate structure must include current and accessible policies and procedures, written performance expectations for all employees, functional workflow graphics or organizational charts, and clearly stated program and service delivery expectations.

IP must monitor websites used for distributing information to ensure that the sites are current, accurate, appropriately referenced, and accessible. Evidence of effective management must include use of comprehensive and accurate information for decisions, clear sources and channels of authority, effective communication practices, procedures for decision-making and conflict resolution, responses to changing conditions, systems of accountability and evaluation, and processes for recognition and reward. IP must align policies and procedures with those of the institution and provide channels within the organization for their regular review.

### Part 10. CAMPUS and EXTERNAL RELATIONS

Internship Programs (IP) must reach out to relevant individuals, campus offices, and external agencies to:

- Establish, maintain, and promote effective relations
- Disseminate information about their own and other related programs and services
- Coordinate and collaborate, where appropriate, in offering programs and services to meet the needs of students and promote their achievement of student learning and development outcomes

IP must have procedures and guidelines consistent with institutional policy corresponding to threats, emergencies, and crisis situations. Systems and procedures must be in place to disseminate timely and accurate information to students and other members of the campus community during emergency situations.

IP must have procedures and guidelines consistent with institutional policy for communicating with the media.

### Part 11. FINANCIAL RESOURCES

Internship Programs (IP) must have adequate funding to accomplish their mission and goals. In establishing funding priorities and making significant changes, a comprehensive analysis, which includes relevant expenditures, external and internal resources, and impact on the campus community, must be conducted. IP must demonstrate fiscal responsibility and cost effectiveness consistent with institutional protocols.

### Part 12. TECHNOLOGY

Internship Programs (IP) must have adequate technology to support their mission. The technology and its use must comply with institutional policies and procedures and be evaluated for compliance with relevant federal, state/provincial, and local requirements.

IP must maintain policies and procedures that address the security and back up of data. When technology is used to facilitate student learning and development, IP must select technology that reflects current best pedagogical practices.

Technology, as well as any workstations or computer labs maintained by the IP for student use, must be accessible and must meet established technology standards for delivery to persons with disabilities.



When IP provide student access to technology, they must provide:

- access to policies that are clear, easy to understand, and available to all students access to instruction or training on how to use the technology
- access to information on the legal and ethical implications of misuse as it pertains to intellectual property, harassment, privacy, and social networks

Student violations of technology policies must follow established institutional student disciplinary procedures. Students who experience negative emotional or psychological consequences from the use of technology must be referred to support services provided by the institution.

#### Part 13. FACILITIES and EQUIPMENT

Internship Programs (IP) must have adequate, accessible, suitably located facilities and equipment to support their mission and goals. If acquiring capital equipment as defined by the institution, IP must take into account expenses related to regular maintenance and life cycle costs. Facilities and equipment must be evaluated regularly, including consideration of sustainability, and be in compliance with relevant federal, state/provincial, and local requirements to provide for access, health, safety, and security.

IP staff members must have work space that is well-equipped, adequate in size, and designed to support their work and responsibilities. For conversations requiring privacy, staff members must have access to a private space.

IP staff members who share work space must have the ability to secure their work adequately.

The design of the facilities must guarantee the security of records and ensure the confidentiality of sensitive information.

The location and layout of the facilities must be sensitive to the special needs of persons with disabilities as well as the needs of constituencies served.

IP must ensure that staff members are knowledgeable of and trained in safety and emergency procedures for securing and vacating the facilities.

### Part 14. ASSESSMENT and EVALUATION

Internship Programs (IP) must establish systematic plans and processes to meet internal and external accountability expectations with regard to program as well as student learning and development outcomes. IP must conduct regular assessment and evaluations. Assessments must include qualitative and quantitative methodologies as appropriate, to determine whether and to what degree the stated mission, goals, and student learning and development outcomes are being met. The process must employ sufficient and sound measures to ensure comprehensiveness. Data collected must include responses from students and other affected constituencies.

IP must evaluate regularly how well they complement and enhance the institution's stated mission and educational effectiveness. Results of these evaluations must be used in revising and improving programs and services, identifying needs and interests in shaping directions of program and service design, and recognizing staff performance.

IP must regularly evaluate, assess, and respond appropriately regarding the extent to which internship sites add to student learning.

General Standards revised in 2008 IP standards developed in 2006

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### Appendix G: CAGUE Recommended Student Learning Outcomes



Massachusetts Board of Higher Education
CAGUE Recommended Student Learning Outcomes

From the Dec 2009 Final Report of the Commissioner's Advisory Group on Undergraduate Education

### College-Level Fundamentals

College-Level Fundamentals represents the array of broad knowledge areas about which students should have significant comprehension and facility.

- **1. Written and oral communication** Including the ability to explain, persuade, advocate and argue effectively when engaged with a variety of audiences.
- **2. Quantitative skills** Including the use of statistical and other mathematical tools and the ability to use mathematical reasoning to solve problems and analyze complex challenges.
- **3. Technological/information science facility** Including the abilities to understand, use and evaluate technology and the information it provides.
- **4. Breadth of knowledge about the physical and natural worlds** Including the way scientific knowledge is acquired, tested, validated, and revised.
- **5. Breadth of knowledge about human cultures -** Including world and American histories, philosophical traditions, religions, and artistic, linguistic, and cultural legacies; economic and political forces; and global interdependence.
- **6. Knowledge in depth/Interdisciplinary knowledge** Including one area of specialization/expertise and an ability to integrate knowledge across disciplines

### **Integrative Thinking**

Integrative Thinking centers on the methodologies from various disciplines to solve complex, real-world problems and to create new solutions. Such skills allow graduates to be successful in an ever-changing world.

- 1. Critical Thinking and Informed Decision-Making The ability to identify challenges and opportunities; analyze root causes; employ multiple perspectives; move from the particular to generalizations; move from concrete situations to abstraction; interpret data; determine similarities and differences; and decide and act based on the best data available.
- **2. Creativity and Innovation** The ability to understand the dynamics of change; execute continuous improvement of existing elements, systems, and processes; create breakthrough improvements and out-of-the-box thinking toward new elements, systems, and processes; demonstrate originality and inventiveness.
- **3. Problem Solving** The ability to test hypotheses; reflect and learn from mistakes; and demonstrate persistence and endurance in seeking and coming to solutions.
- **4. Systems Thinking** The ability to view situations holistically through understanding how immediate actions in one area may affect and interact with other areas with unintended consequences; to understand the parts in relation to the whole.

### Civic, Organizational, and Career Competencies

Civic, Organizational, and Career Competencies encompass a range of personal, interpersonal, and group behaviors that are required to be an effective and successful citizen and worker in any organizational and/or career setting.

- 1. Relevance of Education/Lifelong Learning Graduates understand how their education connects to the real world, to changes in the global economy, trends in the workforce, and future opportunities— the importance of today's knowledge economy and the types of careers associated with this economy—and the need for continuous and lifelong learning to remain effective over the life span. Graduates continue to monitor their learning needs and acquire new knowledge and skills as needed.
- **2. Civic and Social Responsibility -** Graduates know how to be effective citizens who engage in national and international democratic and political processes. Graduates experience their interconnectedness and interdependence with others and understand the responsibilities that come with being part of a community, acting with integrity in an ethical manner.
- **3. Personal Responsibility -** Graduates take responsibility for their actions and for their own career and life choices. Graduates demonstrate an understanding of values and the importance having a moral compass.
- **4. Workplace Skills -** Graduates demonstrate personal accountability and effective professional skills such as goal setting, project management, outcome assessment, and corrective action as well as personal habits such as punctuality and dependability.
- **5. Teamwork/Collaboration** Graduates negotiate and solve interpersonal and team conflicts. Graduates understand the balance between leadership and team roles, assuming necessary responsibilities to achieve goals. Graduates interact with a diversity of colleagues and others in a respectful, effective manner.



### Appendix H: Internship Programs Under The Fair Labor Standards Act

### U.S. Department of Labor Wage and Hour Division

(April 2010)



### 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:

- 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.

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.

### Similar to an Education Environment and the Primary Beneficiary of the Activity

In general, the more an internship/co-op program is structured around a classroom or academic experience as opposed to the employer's actual operations, the more likely the internship/co-op 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/co-op 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 habit 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: <a href="http://www.wagehour.dol.gov">http://www.wagehour.dol.gov</a> and/or call our toll-free information and helpline, available 8 a.m. to 5 p.m. in your time zone, 1-866-4USWAGE

U.S. Department of Labor Frances Perkins Building 200 Constitution Avenue, NW Washington, DC 20210 (1-866-487-9243), 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.



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