

# **STRENGTHENING HIGH SCHOOL WORK-BASED LEARNING: POLICY RECOMMENDATIONS FOR STATES**

The recommendations below can help state leaders think about how to prioritize the various elements of high-quality work-based learning programming for high school students.

## **CREATE FORMAL DEFINITIONS, POLICIES AND REGULATIONS AROUND INTERNSHIPS AND WORK-BASED LEARNING FOR HIGH SCHOOL STUDENTS**

States can take a first step in ensuring high-quality, equally accessible work-based learning (WBL) opportunities for high school students by establishing sufficiently detailed definitions, policies and regulations. WBL is typically defined generally as internships, apprenticeships, paid student-learners, school-based enterprises and the like. While the vast majority of states have adopted a robust definition of WBL that includes a defined set of experiences and activities, 10 states have either a broadly-termed definition that does not specify the types of activities that qualify as WBL or no definition at all.

Multiple states offer strong examples of WBL definitions. For example, **Alaska** [defines](#) WBL as “a coordinated effort between school districts and employers in the Alaska workforce, and refers to learning that results from work experience. It is an opportunity for our high school youth to see firsthand some of the various work environments, to experience some of the job duties for a brief period while receiving classroom credit.” Key components of Alaska’s definition of WBL are that it has a work experience component, that the work experience is connected to instruction in the classroom, and that it is a planned learning activity.

## **ESTABLISH GUIDELINES FOR PROVIDING ACADEMIC CREDIT IN HIGH SCHOOL FOR INTERNSHIP WORK EXPERIENCE, AND CHANGE GRADUATION REQUIREMENTS WHERE NECESSARY**

All states but one currently grant credit toward graduation for work-based learning (WBL), such as internships, but no state requires it. However, some states lay the foundation for such a requirement by mandating students participate in “lighter” forms of WBL in order to graduate. **Oregon**, for example, [requires](#) students to participate in career-related learning experiences. These can include WBL experiences like internships or apprenticeships, but they can also be other opportunities, such as field trips, guest speakers, or job shadows.

**West Virginia** has a similar policy in place, [requiring](#) high school students to participate in an experiential learning opportunity. Like in Oregon, opportunities like internships or apprenticeships count toward this requirement; however, so too do experiences like



senior research projects or community volunteer work.

Beginning with students entering the ninth grade in the 2019-20 school year, **Oklahoma** requires students to complete [Individual Career Academic Planning \(ICAP\)](#) to graduate with a standard diploma. ICAPs must include college and career interest surveys and goals, an intentional sequence of courses leading to those goals, and service learning or work environment experiences.

While all of these career-related learning experiences are a step in the right direction, states should begin requiring more intensive work engagements, like internships, to give students greater opportunity to develop workplace and job-embedded skills and competencies, and gain work experience regardless of their immediate postsecondary plans.

## **ENSURE ALL HIGH SCHOOL STUDENTS ARE ELIGIBLE FOR WBL OPPORTUNITIES AND ELIGIBILITY ISN'T RESTRICTED TO STUDENTS ENROLLED IN SPECIFIC PROGRAMS (E.G., CTE)**

Since all students would benefit from acquiring work experience and workplace skills to prepare for life after high school, ideally work-based learning (WBL) opportunities should be available to any student without restriction. But many states embed WBL solely within career and technical education (CTE) pathways or coursework, often because for too long our K-12 education system has been bifurcated along separate tracks of college or career.

In recent years, though, the lines between college preparatory and vocational education have blurred. Once thought of as the option for students headed straight to a job after high school graduation, CTE today has transformed into a high-quality educational experience that prepares its students for many paths after the 12th grade, including postsecondary education.

Meanwhile, while students and families in past years may have seen college as a once in a lifetime experience that allowed for self-exploration and a chance to gain independence, expectations for college today revolve around careers. In an [ASA nationwide survey](#) of parents of school-age children, the top three reasons for their children to attend college were to gain skills needed for future employment, get a good-paying job, and earn credentials needed to achieve career goals.

With meaningful and fulfilling careers, then, being the ultimate end goal for all students, regardless of what path they pursue immediately after high school, ensuring all students are eligible for WBL is paramount. But more than half of all states either restrict WBL eligibility to students enrolled in CTE courses, or they impose no restrictions from the state level, instead allowing local districts to define eligibility, which creates differences in opportunity across districts. Clear statewide policies that ban any restrictions on WBL participation, beyond those linked to age or grade level, would limit potentially confusing variability from district to district.

## **SUPPORT ACCESS FOR UNDERSERVED GROUPS OF STUDENTS**

Unfortunately, more than two-thirds of states today lack supports to ensure equitable access to work-based learning (WBL) for underserved students, including low-income students, students in low-performing schools, students in underserved communities such as rural schools, students with disabilities, and English Language Learner students. However, a few states are leading the way in innovative approaches, such as creating separate programs for certain underserved student groups, requiring districts to submit detailed plans on how they will serve disadvantaged students when they apply to operate a WBL program, and providing additional funding to ensure students have the materials they need to be successful in WBL.

For example, Illinois' Youth Apprenticeship program provides [wraparound supports](#), such as case management and counseling, and holistic upskilling, with respect to technical skills and soft skills, which help eliminate the peripheral barriers that can stand in the way of student success at a WBL opportunity. The state also passed [a law, SB 1525 \(2019\)](#), that requires the Illinois Department of Children and Family Services Act to provide eligible youth an apprenticeship stipend to cover costs associated with entering an apprenticeship program, such as fees, tuition for classes, work clothes, or occupation-specific tools. And a [report](#) by The Chicago Jobs Council and Young Invincibles outlines best practices that high schools and school districts can implement to diversify their student pipeline for the IL apprenticeship system.

## **ADDRESS KEY BARRIERS, SUCH AS TRANSPORTATION, SAFETY AND WORKERS' COMPENSATION ISSUES**

Even when high school internship opportunities are available, many systemic and structural barriers limit student access. For example, teenagers may have less flexibility in their daily timetable and often must work around the schedules of parents and siblings and school obligations. Furthermore, most teenagers rely on family transportation to get them to a job site. These barriers may be somewhat mitigated with the sudden rise of the virtual internship due to the COVID-19 pandemic. Remote work that can be completed offsite, and in some cases outside of traditional office hours, will open up new avenues for high schoolers to participate in internships, and it is likely that these innovations in virtual work will remain even after the pandemic subsides. But other obstacles remain for high schoolers seeking to add real-world job experience to their resumes, such as labor laws that may be too restrictive for younger populations to join a work site.

Regrettably, few states have taken active steps to address known barriers because, often, they do not have enough information on what those actual barriers are. In general, states tend to track very little, if any, data on work-based learning, which can make it difficult to identify trends in WBL participation and understand how those trends might be driven by existing laws and policies that act as barriers to certain communities, districts, student groups, or employers.



But there are a few states that stand out for their efforts to collect data. In **South Carolina**, for example, the Department of Education uses [data on WBL participation](#) to identify existing barriers to WBL and, in partnership with regional career specialists, the statewide apprenticeship program, and other partners, develop solutions to those specific challenges.

Meanwhile, more than half of states provide stakeholders with a centralized resource that contains information and guidance about relevant laws and policies that may serve as barriers. And some state governments are taking even more proactive steps. In Connecticut, the Department of Education and Department of Labor created [a process](#) to assess and address the risks posed to students engaging in high-risk WBL opportunities, such as health occupations and manufacturing. This collaboration resulted in the creation of a CTDOL waiver from state regulations that place an age restriction on participation in WBL opportunities in certain industries.

## **CREATE FINANCIAL INCENTIVES FOR EMPLOYERS TO**

### **EXPAND INTERNSHIP OPPORTUNITIES**

More than half of states today offer no financial incentives to help companies better afford a youth internship program and to incent corporate cultures that value intern experience. For the states that do, the most common approach is to provide a corporate income tax credit up to a specified amount for a qualified business that hires interns. Often the credit is restricted to qualified businesses in certain industries as dictated by state or local workforce needs. Many of these programs may start out targeted toward the more traditional college internship but could be expanded to incentivize the hiring of high school interns.

Other types of financial incentives have been employed as well. The [Vermont Training Program](#) provides performance-based workforce grants for pre-employment training, training for new hires, and training for incumbent workers. Grants may cover up to 50% of training costs. The program includes employers that partner with a school or education program to employ and train high school students participating in work-based learning experiences. In addition, the Vermont Department of Labor's [Vermont Internship Program](#) provides grants to organizations that support or connect Vermont employers with student interns from regional technical centers or postsecondary educational institutions.

## **ESTABLISH DEDICATED FUNDING STREAMS**

Too often, high school students cannot participate in an internship simply because they can't afford to. Low-income students, many of whom may have to contribute financially to the family during the economic strain of COVID-19, often have to seek any job that offers a paycheck, rather than one that aligns with possible career interests or offers an opportunity to build specific skills. During the pandemic, research has shown that students are not only having to work to earn pay, but that in some cases they are even stopping out of school to do so: Daily student absence rates nearly [doubled](#) from before the pandemic to fall 2020, in both remote and in-person learning settings, and often students were working instead of attending class. We need kids learning through work—not working instead of learning. All students



deserve an opportunity to attend school and learn on the job skills, with well-funded work-based learning (WBL) where they can explore careers they may want to pursue someday and simultaneously earn much needed wages.

For student interns to be paid, internships need to be robustly and dependably funded, whether by public or private dollars. Schools and districts can access some federal funding for high school intern pay through the Workforce Innovation and Opportunity Act and the Carl D. Perkins Career and Technical Education Act. Employers can also pay interns themselves, but many may need additional funding from government, schools, nonprofits, foundations, or philanthropic entities to do so. Some states do provide funding to support youth work-based learning, but it is primarily through grants; more than half of states today have no dedicated source of funding for WBL. These grant programs can provide an important infusion of cash to support schools, districts, or other organizations to launch WBL programs. However, the funds are not a consistent source of support, meaning that districts and organizations may have difficulty sustaining WBL programs beyond the duration of the grant period.

In **Pennsylvania**, WBL is funded through a combination of grant programs as part of workforce development efforts. For example, apprenticeship programs can access grants through the [PA Smart Initiative](#); local workforce development boards can apply for the [State/Local Internship Program \(SLIP\) grant](#), which offers wages at a minimum of \$10.35 an hour for young adults between the ages of 16 and 24; and in the fall of 2019, the state announced it would be investing \$2.5 million in new [Business-Education Partnership grants](#), which local workforce development boards can use to connect schools, employers, and students. State funding for internships can also go toward administrative costs.

In **South Carolina**, the [state provides WBL funds](#) to districts, which districts can use in a variety of ways to support their WBL programs, such as hiring a WBL coordinator, transporting students, or providing staff with professional development related to WBL.

## **ESTABLISH STATEWIDE SUPPORT INFRASTRUCTURE, INTERMEDIARY, AND/OR PUBLIC-PRIVATE PARTNERSHIPS**

There is a lack of information available for high school students to access internships, and for employers to find interns. An ASA nationwide survey of high school students found that overall nearly 80 percent expressed interest in obtaining an internship, but only 34 percent reported hearing about available internships. Centralized statewide intermediary organizations and/or public-private partnerships can play a critical role in connecting students, employers, schools, community-based organizations, youth centers and support services to appropriate opportunities. Intermediaries can also help employers with many of the time-consuming administrative burdens of running an internship program, such as developing job descriptions, screening applicants, hosting an intern boot camp orientation, supporting intern supervisors and handling payroll and liability logistics.

An intermediary can be one entity or a partnership between several entities, including



nonprofits, local workforce boards, industry associations or councils, labor unions, for-profit organizations, local government, or local or regional economic development organizations. More than half of states lack a statewide organization or intermediary system to facilitate cross-sector partnerships related to work-based learning (WBL), but about one-third of states do have small and/or local intermediaries in operation that could be scaled to serve more students in more regions of the state.

In **Delaware**, Delaware Technical Community College (DTCC) is the lead agency for WBL in the state. DTCC supports county teams to provide regional and statewide coordination by organizing meetings, maintaining shared resources, leading and/or supporting school and employer engagement, and providing professional development. The [Office of Work-Based Learning](#), which functions as part of the DTCC, serves as an employer intermediary in support of local education agencies, and business and industry partners.

In **Iowa**, the [Statewide Work-Based Learning Intermediary Network](#) comprises 15 regional intermediary networks that connect business and education by offering WBL activities to students and educators in their regions. The regional intermediaries provide a one-stop contact point for educators and employers to access information about WBL. Still other programs facilitated by an intermediary focus specifically on high school internships, such as Skills for Rhode Island's Future's [PrepareRI program](#) (sponsored in part by ASA).

## **ESTABLISH COMMUNICATIONS INFRASTRUCTURE**

Today, many states and/or their intermediaries have put formal processes in place to communicate among stakeholders about work-based learning (WBL) opportunities. In **Nevada**, [LifeWorksNV.org](#) is a WBL hub where users can find internships, apprenticeships, on-the-job training, and career and technical education (CTE) programs. LifeWorks utilizes strategic partnerships between Nevada government agencies, K-12 public education, business and industry leaders, and the Nevada System of Higher Education.

The [Iowa Clearinghouse for Work-Based Learning](#), which connects students and employers through shared projects that enable students to learn through real-world professional experiences, features a project board. The project board allows employers to post real-world tasks that students can complete with teacher supervision, and a business partner director for teachers to find other kinds of WBL opportunities, like internships.

However, while many of these communications efforts are good first steps, they are not always comprehensive or well-publicized. Many states have websites with apprenticeship opportunities but fail to include other WBL opportunities — and it is not always clear how up-to-date or well-used these websites are. A more unified statewide approach to WBL communications can boost participation levels and produce better outcomes for all stakeholders.



## **ESTABLISH STATEWIDE FRAMEWORK THAT DEFINES QUALITY EXPECTATIONS FOR HIGH SCHOOL INTERNSHIPS AND HOLDS EMPLOYERS AND SCHOOLS/DISTRICTS ACCOUNTABLE**

Without a definition of beneficial work-based learning (WBL) outcomes for students, states have no way to ensure that WBL and internship opportunities are equally rigorous and valuable for students. But most states fail to set clear expectations for the quality of their WBL programs and those that do provide guidance, such as sample rubrics or checklists, often have no accountability mechanism to enforce them.

However, a handful of states do have both a clear framework outlining the components of quality WBL experiences and a process in place to assess them and hold programs accountable. **New York**, for example, requires WBL programs to be approved by the New York Department of Education and they must re-register every few years. Strict requirements include a certified teacher or guidance counselor to serve as WBL coordinator, an industry advisory committee, safety training prior to placement at a worksite, supervised on-the-job training, related in-school instruction, a memorandum of agreement between schools and employers, a student training plan, and an employer evaluation. Additionally, for unregistered WBL programs, the state manual provides a list of highly recommended components. In **Pennsylvania**, WBL activities must meet certain quality standards to qualify for the [Industry-Based Learning Indicator](#) on the state's school-level accountability index.

Setting clear definitions and guidelines for the employer role in WBL is also essential. Several states proactively offer employers guidance on providing students with a high-quality experience, but only two states take a further step of requiring additional action on the part of employers. **Washington** [requires](#) supervisors to receive program orientation training, give instruction/feedback, and contribute to the development of the student's learning plan and assessment of the student's learning. **West Virginia** requires its counties to provide staff development for mentors and supervisors of WBL, while the [state's manual](#) recommends that parents, students, school-site coordinators, and work-site mentors sign a training plan.

## **TRACK STUDENT PARTICIPATION IN INTERNSHIPS AND THEIR OUTCOMES, AND DISAGGREGATE DATA BY STUDENT DEMOGRAPHICS**

It's often said that "you get what you measure" and "you can only improve what you measure." Without the proper data collection systems in place to track key demographic information about students participating in internships or their outcomes, states can never hope to spot important trends, identify gaps in service, or showcase promising practices. More than half of all states are not collecting data about their internships and other work-based learning (WBL) programs and even among the ones that do, some collect this information only for certain types of WBL experiences or only for certain groups of students, such as CTE concentrators. Still others may have a process in place to track data around WBL, but it does not include student participation rates as well as the outcomes (such as grades or employer ratings).

A few states do stand out for robust data collection methods. **Illinois** [requires](#) school report cards to include current data on the percentage of students who participated in WBL opportunities and whether a school offers CTE opportunities. Georgia has an online data collection system called [C-NET](#) where WBL coordinators are expected to submit student demographic information, employer data, worksite visit documentation, earnings records, employer evaluations/student assessment records, training plans, and training agreements. **Louisiana** collects data from an on-site visit by teachers, a weekly work record, and a student evaluation, and **Mississippi** has a [process](#) in place to capture student participation in WBL courses and their outcomes at the district level.

Even among states that do collect data, few take the further step of using that data to drive greater equity in access to internships and all forms of WBL. Disaggregating WBL outcomes by student subgroups or WBL program type consistently, as opposed to a one-time effort, can give states the data they need to ensure high-quality WBL opportunities are accessed at similar rates across different student groups. Some states disaggregate WBL data, but only for certain types of WBL experiences or only for certain groups of students. Only one state, **Iowa**, [disaggregates](#) WBL participation data over time by school size and service area, student grade level and gender, and whether the student qualifies as a minority or is eligible for free-or reduced-price lunch. More states should follow Iowa's example in using data to get a clearer picture of which students are gaining access to internships and other WBL opportunities and where access gaps remain.

## CONCLUSION

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Systemic policy change is needed to ensure more students have access to life-changing internship opportunities that offer real-world experience and on-the-job training. We encourage lawmakers, particularly at the state level, to enact policies that will ease the path to an educated, experienced workforce. Policymakers should look to the examples set by several forward-thinking states that have sought to increase the availability of internships overall, as well as enhance the intern experience for student and employer alike. Many of these strategies can be replicated or brought to scale to guarantee internships remain a staple of experiential learning for generations to come.

