Governor's Workforce Board
RHODE ISLAND
train for success · connect for growth

Workforce Guidance

TO: **RHODE ISLAND DEPARTMENT OF EDUCATION, RHODE ISLAND OFFICE OF THE POSTSECONDARY COMMISSIONER, WORKFORCE NETWORK PARTNERS**

FROM: Governor's Workforce Board

SUBJECT: Defining Work-based Learning Activities and Standards

DATE: January 18, 2018

PURPOSE

To provide guidance to high schools, postsecondary institutions, training providers, nonprofits, government agencies, and other workforce network partners regarding the Governor's Workforce Board's (GWB) vision for work-based learning activities for youth, particularly youth enrolled in high school or of high school age.

BACKGROUND

The PrepareRI initiative represents a strategic partnership between the Rhode Island government, private industry leaders, the public education system, universities, and non-profits across the state working in collaboration to prepare all Rhode Island youth with the skills they need for jobs that pay.

There currently exists a wide skills gap in the state: nearly 60% of Rhode Island employers surveyed report having a very hard time filling vacancies in high-skill positions. The two greatest barriers employers face in hiring middle and high-skill positions are lack of job-specific technical skills and lack of relevant work experience, and the #1 request from surveyed employers is to strengthen educational programs that prepare students for jobs and careers in high-demand occupations and industries.

PrepareRI aims to close the gap between what students learn in school and what they need for high-demand jobs. The initiative was built on the belief that all young people — regardless of their previous background or intended career — will need some form of postsecondary credential and practical work experience to be successful. For businesses, PrepareRI ensures that employers have the workforce they require to thrive in the economy of tomorrow. This fills a crucial need in Rhode Island; currently, less than 45 percent of residents have a postsecondary degree or industry-recognized certificate, yet 70 percent of jobs will require those credentials by 2020. PrepareRI will restructure the entire talent pipeline in Rhode Island, from kindergarten to career, by ensuring that all students are college and career ready, and on career paths in high-wage, high-growth industries.

GUIDANCE

The GWB presents the following definitions, standards, and guidance regarding work-based learning for youth, particularly youth enrolled in high school and of high school age. This work was developed through a series of conversations and relied on the following:

- Best practices from other states;
- Research and recommendations from an outside consultant;
- Employer, educator, and other stakeholder feedback from the GWB's Career Pathways Advisory Committee;
- Feedback from the Rhode Island Department of Education; and
- Workforce Innovation and Opportunity Act (WIOA) definition of a "work experience."

The GWB intends for this document to inform other state agency work, investments, and programming as it relates to career readiness and work-based learning. However, it is by no means an exclusive or exhaustive document, and should be supplemented with ongoing conversations with stakeholders. This and corresponding documents will be reviewed on an ongoing basis and is subject to change as stakeholders continue to provide feedback and develop best practices. Included in this guidance is:
1. Vision for work-based learning
2. Definition of work-based learning
3. Standards and expectations for high-quality work-based learning (both general and for specific activities)
4. Guidance for schools and employers regarding insurance and liability as it relates to internships

VISION
Work-based learning is an essential component of a student's career pathway, building on their classroom knowledge with practical experience in the workplace and interaction with industry and community professionals. Work-based learning allows students to apply and develop their academic, technical, and essential skills, shows students the relevance of their education as it connects to the real world, and prepares them for success in college and career. Our vision is that by 2020:
- All high schools will have high-quality work-based learning programming
- All career pathway programs will be aligned to Rhode Island's high-wage, high-demand career fields

DEFINITION
The GWB defines a **work-based learning activity** as a planned, structured learning experience that provides youth (ages 14-24, in school or out of school) with real-life or simulated work experiences where they can develop and apply academic, technical, and essential skills; and contributes to the achievement of their postsecondary and employment goal(s). The GWB is employing a flexible definition of WBL, encompassing the activities below:

- **Internship**: A position for a student or trainee to work in an organization, sometimes without pay, to gain work experience, satisfy requirements for a credential, and/or gain course credit.
- **Apprenticeship**: Highly-formal job training experience that involves studying with a master of the trade on the job.[1]
- **Service-learning**: A program or project which combines community service with an outside organization with a structured opportunity for reflection about that service, emphasizing the connections between service experiences and academic learning.
- **School-based enterprise**: Students produce and sell goods or services in the school and learn about business skills and entrepreneurship. This may be part of an entrepreneurship course, and a business professional may serve as a mentor and advisor for the enterprise.
- **Industry project**: Individual, group, or class-wide projects in which students address a real-world, industry-focused question or problem with the guidance of industry professionals.

These experiences are often credit-bearing opportunities that provide students with rigorous opportunities to pursue career and industry-connected learning both during and outside of the traditional school day. Work-based learning experiences can occur through a variety of delivery mechanisms, including but not limited to

---

[1] Registered apprenticeships should be designed with the support and guidance of ApprenticeshipRI and should be approved by the Rhode Island Apprenticeship Council – details around that process are still being developed.

expanded learning opportunities (ELOs), summer youth employment programming, in-school courses, dual enrollment, Advanced Course Network courses, and online or blended learning options.

The GWB recommends that schools, districts, industry partners, businesses, community-based organizations, and others engaged in work-based learning design and implement activities which are safe, follow all State and Federal labor laws, allow students to earn academic credit and/or wages, and meet standards for quality outlined below, and in the additional detailed work-based learning guidance document.

- **Rigorous**: Skill-based, and tied to measurable outcomes. The experience should allow a student to gain measurable skills, whether those be essential skills (also known as professional skills, soft skills, or 21st century skills) or hard technical skills. The entire activity, including corresponding classroom time, should encompass a minimum of 80 hours.
- **Relevant**: Connected to a student's interests, as indicated in his/her Individualized Learning Plan (ILP) and to the real world of work. Projects and tasks should mirror those that exist in a real workplace, and should align to high-wage, high-demand industries in Rhode Island.
- **Reflective**: Engages the student in reflection and analysis throughout and after the experience, including guided self-reflection (ex. through the ILP process) and meaningful evaluations from the industry professionals. In this process, students should connect the work-based learning experience to their academic work as well as future professional and educational goals.
- **Interactive**: Providing multiple and extended opportunities for students to interact with industry professionals, whether as supervisors, mentors, advisors, or collaborators.
- **Integrated**: Connected with the student's school-based curriculum. A work-based learning experience is a practical application of academic and/or technical learning and should allow the student to practice the theory learned in the classroom in a real-world setting.

The GWB recommends that high-quality work-based learning activities be designed in order for youth to develop and apply the following essential skills:

- **Collaboration and teamwork**: Works effectively within and contribute to teams, learns from and works collaboratively with others, shows adaptiveness and flexibility, and effectively negotiates conflict.
- **Communication**: Listens actively and articulates and presents information clearly and effectively in written, visual, and verbal forms.
- **Critical thinking and problem solving**: Distills and analyzes information, makes judgements based on evidence, and uses data and information to solve problems.
- **Initiative and self-management**: Works independently as needed, monitors and prioritizes his/her own time and tasks, takes initiative to solve problems as appropriate, and employs persistence to take tasks to completion.
- **Professionalism**: Follows and can articulate workplace norms such as punctuality, appropriate workplace communication and interactions, and professional dress.

Questions or comments concerning this guidance may be directed by phone or by email at:

Rhode Island Department of Labor and Training
Governor's Workforce Board RI
1511 Pontiac Avenue, Building 72-3
Cranston, Rhode Island 02920
(401) 462-8860
www.gwb.ri.gov

STANDARDS FOR HIGH-QUALITY K-12 WORK-BASED LEARNING

Internship: A position for a student or trainee to work in an organization, sometimes without pay, to gain work experience, satisfy requirements for a credential, and/or gain course credit.	
Outcomes:	• Student earns wages and/or academic credit and/or industry credential (as defined in the RI CTE Recognized Credential List) • Student demonstrates knowledge of occupation and industry • Student demonstrates knowledge and capacity for networking, professional culture • Student demonstrates growth in industry knowledge, technical skills, and essential skills according to assessments, reflections, portfolios, and/or employer evaluations • Student and employer have positive experience according to feedback and evaluations
Youth-serving organization (school, youth center, community-based organization, other) and/or Intermediary expectations: *For the GWB Summer Internship Pilot and program, the centralized intermediary will fulfill these roles.	• Work with employers to identify needed skills and develop job descriptions outlining relevant, rigorous, and age-appropriate tasks and projects which allow student to practice a variety of professional, academic, and technical skills* • Ensure student preparation with regard to essential skills and required technical skills*; if applicable, deliver pre-internship curriculum and/or internship orientation to prepare students* • Screen applicants, and facilitate interviews and placements* • Support supervisors and interns during internship as primary point of contact* • Conduct a minimum of one site visit and one check-in call to ensure quality and appropriateness of placement* • Establish and make students aware of clear process and protocol for intervention in the case of a conflict or issue* • Develop and ensure completion of supervisor and intern evaluations* • Manage payroll and liability logistics (if applicable)* • *Award academic credit to student* • *Intentionally connect internship to career education pathway, Individualized Learning Plan (ILP), and/or academic curriculum*
Employer expectations:	• Recruit internship supervisors and mentors • With assistance from youth-serving organization and/or intermediary, develop clear job description outlining relevant, rigorous, and age-appropriate tasks and projects which allow student to practice a variety of professional, academic, and technical skills • Verify that internship meets all safety regulations and labor laws • Help interview and select interns • Supervisor onboards interns and meets regularly with student to provide feedback and assess progress • Supervisor completes evaluations (at least midpoint and final) tied to measurable outcomes and skills outlined in the job description to evaluate intern performance and progress • *Provide intern access to a professional mentor to guide him/her in career goals* • *Integrate intern into company teams and facilitate regular engagement with employees* • *Provide opportunities for intern to have ownership of distinct projects in addition to day to day work* • *Pay wages to student*
Student expectations:	• Successfully complete application and/or work readiness training prior to internship • Demonstrate competency in essential skills, such as arriving to work on time, dressing and communicating professionally, adhering to deadlines, etc. • Reflect on experience and learning in ILP (individualized learning plan) • Complete internship evaluation

Standards in italics are encouraged but not required.

*Note: "Student" may also refer to a young person participating in a work-based learning activity but not enrolled in school.

Industry Project: Individual, group, or class-wide projects in which students address a real-world, industry-focused question or problem with the guidance of industry professionals.	
Outcomes:	• Students earn academic credit, whether for the project itself or as part of a credit-bearing course • Students demonstrate knowledge of occupation and industry • Students demonstrate growth in industry knowledge, technical skills, and essential skills according to assessments, reflections, portfolios, and/or employer evaluations • Students and employer mentor have positive experience according to feedback and evaluations
Youth-serving organization (school, youth center, community-based organization, other) expectations:	• Work with employer or industry mentors to develop an age-appropriate and rigorous industry project with clear timeline, outcomes, and deliverables that applies or mimics the real world of work as it relates to that industry and allows students to practice a variety of professional, academic, and technical skills (could be in combination with a service-learning project) • Ensure student preparation with regard to industry knowledge and required academic, professional, and technical skills • Support industry mentors throughout the project, act as co-teachers, continue industry project work on days when industry mentor is not present in the classroom, and ensure students complete homework as needed • Ensure all students participate and are engaged in the industry project • Develop and ensure completion of mentor and student evaluations • Award academic credit to students • *Intentionally connect industry project to career education pathway, Individualized Learning Plan (ILP), and/or academic curriculum*
Employer expectations:	• Recruit industry mentors to lead projects • Work with youth-serving organization to develop an age-appropriate and rigorous industry project with clear timeline, outcomes, and deliverables that applies or mimics the real world of work as it relates to that industry and allows students to practice a variety of professional, academic, and technical skills • Verify that industry project meets all safety regulations • Industry mentor engages regularly with students (in person or virtually) to provide guidance and feedback from the industry perspective and assess progress • Industry mentor recruits other industry representatives for a culminating presentation of student work • Industry mentor completes evaluations to give feedback • *Provide students access to additional mentors to guide them in career goals* • *Provide opportunities for students to visit the company off-site to see how their work connects to the real world*
Student expectations:	• Fully engage in industry project preparation activities • Fully engage in industry project according to assigned role • Present final project outcomes to industry representatives • Reflect on experience and learning in ILP (individualized learning plan) • Complete industry project evaluation

Standards in italics are encouraged but not required.

*Note: "Student" may also refer to a young person participating in a work-based learning activity but not enrolled in school.

Service Learning Project: A program or project which combines community service with an outside organization with a structured opportunity for reflection about that service, emphasizing the connections between service experiences and academic learning.	
Outcomes:	• Students earn academic credit, whether for the project itself or as part of a credit-bearing course • Positive impact on the community • Students demonstrate growth in technical and essential skills according to assessments, reflections, portfolios, and/or community partner evaluations • Students demonstrate growth in perceived agency, passion, empathy, sense of pride and accomplishment • Students and community partner have positive experience according to feedback and evaluations
Youth-serving organization (school, youth center, community-based organization, other) expectations:	• Work with community partners to develop an age-appropriate and rigorous service learning project with clear timeline, outcomes, and deliverables that responds to an authentic community need and allows students to practice a variety of professional, academic, and technical skills • Ensure student preparation with regard to industry knowledge and required academic, professional, and technical skills • Support community partners throughout the service learning project, act as co-teachers, continue project work on days when community partner is not present in the classroom, and ensure students complete tasks as needed • Ensure all students participate and are engaged in the service learning project • Develop and implement concurrent learning and reflection activities in the classroom • Develop and ensure completion of mentor and student evaluations • Award academic credit to students • *Intentionally connect service learning project to career education pathway, Individualized Learning Plan (ILP), and/or academic curriculum*
Community Partner expectations:	• Work with youth-serving organization to develop an age-appropriate and rigorous service learning project with clear timeline, outcomes, and deliverables that responds to an authentic community need and allows students to practice a variety of professional, academic, and technical skills (could be in combination with an industry project) • Be the liaison between students and members of the community, and ensure that the service learning project goals are developed with community input (*facilitate students and community members working together to identify community needs and develop project goals*) • Verify that service learning project meets all safety regulations • Community partner mentors engages regularly with students (in person or virtually) to provide guidance and feedback from the community perspective and assess progress • Community partner mentors recruit community members for a culminating presentation of student work • Community partner mentors complete evaluations to give feedback • *Provide students access to additional community and professional mentors to guide them in career goals*
Student expectations:	• Fully engage in service learning project preparation activities • Fully engage in service learning project according to assigned role • Present final project outcomes to community representatives • Reflect on experience and learning in ILP (individualized learning plan) • Complete service learning project evaluation

Standards in italics are encouraged but not required.

*Note: "Student" may also refer to a young person participating in a work-based learning activity but not enrolled in school.

School-based Enterprise: Students produce and sell goods or services in the school and learn about business skills and entrepreneurship. This may be part of an entrepreneurship course, and a business professional may serve as a mentor and advisor for the enterprise.	
Outcomes:	• Students earn academic credit, whether for the project itself or as part of a credit-bearing course • Students successfully sell product and make a profit, or recognize deficiencies if sales are not successful • Students demonstrate growth in entrepreneurship and business knowledge and skills, and essential skills according to assessments, reflections, portfolios, and/or industry partner evaluations • Students and industry partners have positive experience according to feedback and evaluations
Youth-serving organization (school, youth center, community-based organization, other) expectations:	• Work with industry partners to develop an age-appropriate and rigorous school-based enterprise with clear timeline, outcomes, and deliverables that responds to a needs assessment and meets a real-life consumer demand and allows students to practice a variety of professional, academic, and technical skills • Ensure student preparation with regard to entrepreneurship and business knowledge • Support industry partners throughout the school-based enterprise, act as co-teachers, continue enterprise work on days when industry partner is not present in the classroom, and ensure students complete tasks as needed • Ensure all students participate and are engaged in the school-based enterprise • Verify that school-based enterprise meets all safety and financial/tax regulations • Develop and ensure completion of industry partner and student evaluations • Award academic credit to students • *Intentionally connect service learning project to career education pathway, Individualized Learning Plan (ILP), and/or academic curriculum*
Employer expectations:	• Work with youth-serving organization to develop an age-appropriate and rigorous school-based enterprise with clear timeline, outcomes, and deliverables that responds to a needs assessment and meets a real-life consumer demand and allows students to practice a variety of professional, academic, and technical skills • Advise students on how to conduct a needs assessment and determine a real-life consumer demand • Industry mentors engages regularly with students (in person or virtually) to provide guidance and feedback from the business perspective and assess progress • Industry mentors complete evaluations to give feedback • *Provide students access to additional professional mentors to guide them in career goals*
Student expectations:	• Fully engage in school-based enterprise preparation activities • Fully engage in school-based enterprise according to assigned role, including the conceptualization, development, marketing, and management of the enterprise • Reflect on experience and learning in ILP (individualized learning plan) • Complete school-based enterprise evaluation

Standards in italics are encouraged but not required.

*Note: "Student" may also refer to a young person participating in a work-based learning activity but not enrolled in school.

Legal Questions around Youth Internships

Our goals are for schools and businesses to design and implement internships that are:
- Meaningful and valuable to the student and business;
- Safe for the student and everyone at the workplace; and,
- Opportunities for students to learn valuable technical and professional skills and earn wages and/or credit.

When students participate in internships at a workplace outside of school, questions and concerns often arise around legal issues, and particularly regarding liability and insurance. Schools and businesses will generally find that they already possess the necessary insurance coverage to engage in student internships with limited added risk. The best way to reduce risk is to ensure that students, businesses, and parents/guardians are fully aware of the nature of the internships and additional risks, and prepared in terms of knowledge and skills that will limit potential for injury or accident. Additionally, paid internships create an employer-employee relationship and provide clear recourse should accidents occur.

Age Restrictions: Students 16+ can engage in internships, and businesses should follow child labor laws around hours worked and hazardous occupations when designing these opportunities. Students 14-15 may also legally work, however the laws are stricter.
Recommendation: The GWB recommends that internships be designed for students 16 and over. For students under 16, there are other options for work-based learning opportunities.

Liability of Businesses: The issue of liability arises whenever any business has individuals on its work site. A business' Comprehensive General Liability (CGL) policy should cover students and volunteers engaging in internships, whether paid or unpaid. Exposure to liability is generally no different than what exists relative to employees and the general public, such as when visitors enter the workplace; and CGL policies should not increase in cost because of minors at the work-site. If students are paid and considered employees of the business, students and the business are protected as in any other employer-employee relationship, and the student would be eligible for Workers' Compensation benefits should he/she be injured during the internship. Workers' Compensation costs are based on wages, and not age of the employee, therefore Workers' Compensation premiums should not increase substantially because wages for student interns will be low. If the student is unpaid, the business' CGL policy should cover what the student's personal health insurance will not in the case of injury.
Recommendation: To participate in paid or unpaid internships, businesses must have Comprehensive General Liability (CGL) policies and must ensure that those policies will cover student interns. Whenever possible, students should be paid for their work experiences, and paid students must be covered by the employer's Workers' Compensation insurance. For unpaid internships, it is recommended that schools and internship hosts enter into "Indemnification, Hold Harmless" contracts in which schools extend their liability policies to businesses to provide added peace of mind. Unpaid internships should also follow the criteria as put forth by the U.S. Department of Labor.

Liability of Schools: School liability policies generally do cover school-sponsored activities off-site, including internships. Schools, school staff, and school committee members are generally protected under school liability policies if students are hurt, injure another employee, or do damage at a worksite. School liability policies typically do not cover individual students for any activities, in the event that they are injured or cause damage. Those districts covered under The Trust (RI Interlocal Risk Management Trust) can view an FAQ document [here](). Districts not covered under The Trust should contact their providers.

Recommendation: Schools should have liability insurance policies and ensure with their provider that those policies cover off-site school-sponsored internships. Schools should also consider offering basic accident or catastrophic insurance to students as added protection in the case of accident or injury.

Safe and Informed Experiences: Above all, students, parents/guardians, and businesses should be fully aware of the opportunities and risks of internships, and should be clear on the expectations of the experience. Businesses should be expected to maintain safe working environments in terms of physical safety and discrimination and harassment. Students should be fully prepared for the experiences and expected to follow the norms and expectations of their worksite.

Recommendation: Schools and/or intermediaries managing internships should hold comprehensive orientations for businesses and students covering topics such as workplace safety, workers' rights, and discrimination and harassment and clear lines of recourse in case any situations should occur. Parents should sign permission forms and waivers for their students to engage in internships and acknowledge the added risks of these activities. Parents and guardians should also give permission for transportation to the internship sites, whether that is through public transportation, school transportation, or students transporting themselves. Schools and/or intermediaries may also want to request and confirm student medical and auto insurance coverage, if applicable.

This document does not substitute for the advice of an attorney or of the government agencies charged with administering and enforcing the laws.