

Increasing Access to and Participation in Internships

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Abstract

As internships become more common for arts students, it is important for university administrators and faculty to be aware of the challenges and burdens that an internship can place on students in addition to the benefits provided by an internship. Through awareness of the barriers and burdens associated with internships, universities can work to make the internship experience more accessible to students. This paper details how one college of fine arts at a public research university worked to increase enrollment in internship classes and to make internships more accessible to its students. Through a variety of initiatives including the promotion of a new minor in arts administration, the development of an intern scholarship, the offering of summer internship courses through a lower cost university extension program, moving internship courses online and partnering with academic advisors the college was able to increase participation in internship courses by 156% over a three-year period between 2016-2019.

Keywords: internships, arts administration, access, equity, arts careers

Introduction

As internships become more common for arts students (Frenette, Dumford, Miller, & Tepper, 2015), it is important to consider that many students face both financial and non-financial barriers to internships. On the financial side, barriers include the norm of unpaid internships in the arts and the cost of tuition for internship credits. Non-financial barriers include a lack of social connections to secure internships and a lack of available time to engage in an internship. Arts administration students are often required to do an internship as part of their degree (Cuyler & Hodges, 2015). In addition to arts administration students, a number of students in other arts majors opt to do internships possibly due to a gap between the curriculum and the skills they will need to manage their arts careers (Daniel & Daniel, 2013). As a result, it is important for university administrators and faculty to be aware of the challenges and burdens that an internship can place on students in addition to the benefits provided by an internship. Through awareness of the barriers and burdens associated with internships, universities can work to make the internship experience more accessible to students.

This paper details how the College of Fine Arts at the University of Texas at Austin worked to increase enrollment in internship courses and to make internships more accessible to its students. The College of Fine Arts at UT was able to increase participation in internship courses by 156% over a three-year period through a variety of initiatives. These initiatives took place between 2016-2019 and included the promotion of a new minor in arts administration, the development of an intern scholarship, the offering of summer internship courses through a lower cost university extension program, moving internship courses online and working with academic advisors to spread awareness about the internship courses. The hope is that the case study provided here will encourage other university arts programs to think creatively about how they can create more meaningful and accessible internship experiences.

Background

Challenges and Advantages of Internship Participation

The designation of internships as High Impact Practices (HIP) has led many higher education institutions to encourage or require internships (Hora, 2019). According to the National Association of Colleges and Employers (NACE), 65% of students participate in internships (Crain, 2016). This echoes the findings of the Strategic National Arts Alumni Project (SNAAP), which found that 69% of arts graduates participated in an internship (Frenette et al., 2015). One reason for the popularity of internships might be the belief that an internship can advance one's career (Frenette et al., 2015). Miller, Martin and Frenette (2022) found that "internship experience was among the strongest predictors of initial job search length and match with training" (p. 8). Students have also indicated that the internship experience is a meaningful and beneficial part of their studies (Cuyler & Hodges, 2015; Daniel & Daniel, 2013). Cuyler & Hodges (2015) found that the majority of students in their study "believed that an internship is a valuable learning experience that supplemented their coursework" (p. 70). The ability to gain hands-on experience and learn about various opportunities within the field are two commonly cited benefits of internships (Hora, Chen, Parrott & Her, 2020).

Although internships have been linked to early job attainment (Miller et al., 2022), one study found that students who completed unpaid internships were more likely to still be seeking employment six months after graduation compared to students who completed paid internships

(Crain, 2016). This study looked at students from various majors and does not account for differences that might exist in industries where the unpaid internship is the norm. However, the Strategic National Arts Alumni Project also found that students who engaged in paid internships fared better in the job market than those who did unpaid internships (Frenette et al., 2015). This leads to a question of whether unpaid internships are worth the sacrifice and how this might differ between fields where unpaid internships are the norm compared to fields where internships are commonly paid.

While there has been a push to pay interns, many internships in the arts remain unpaid. In fact, unpaid internships significantly increased between 1992 and 2008 (Shade & Jacobson, 2015). A UK study (Cullinane & Montacute, 2018) found that the arts were one of the most problematic sectors with regards to internships. The findings indicated that in the UK, the majority of arts internships were unpaid and individuals were expected to participate in numerous internships before securing full-time employment. The Strategic National Arts Alumni Project also found that graduates of arts programs often engage in multiple internships for career development purposes (Frenette, Gualtieri & Robinson, 2021). Not surprisingly, students prefer to have paid internships and believe that arts organizations should compensate them for their time and work (Cuyler & Hodges, 2015). However, even though students believe they should be compensated, many students in Cuyler & Hodges (2015) study “seemed to value internships so much that they would accept an internship for the sake of gaining experience” (p. 74). It appears that many up and coming individuals seeking careers in the arts “are prepared to work for free in order to build a network and secure future employment” (Samdanis & Lee, 2019, p. 891). While one might assume unpaid internships are more common in non-profit organizations, unpaid internships are also common in certain for-profit sectors, including the music industry (Frenette, 2013).

In 2019, the art world took a step to end the practice of unpaid internships in art museums. That June, “the Board of Trustees of the Association of Art Museum Directors (AAMD) urged art museums to end their longstanding practice of employing unpaid interns” (Bishara, 2019, para 1). The AAMD represents museum directors from 227 museums across the United States, Canada and Mexico. The AAMD acknowledged that paid internships were needed in order to increase access and equity in the world of museum administration. The group, Art + Museum Transparency also initiated a project to collect data regarding the compensation of art and museum interns (Cascone, 2019). Their data collection revealed that many of the most prestigious museums including New York’s Metropolitan Museum of Art, the Brooklyn Museum, the Museum of Fine Arts Boston and the National Portrait Gallery were not paying interns at the time of the 2019 survey.

Financial challenges around internships are a common cause of concern for students (Cuyler & Hodges, 2016; Hora et al., 2020; Wolfgram, Vivona & Akram, 2021). Students mentioned concerns about both the lack of compensation and the requirement to earn internship credit at their institution, which required them to pay tuition associated with the internship. “Requiring students to pay tuition to their academic institutions in order to work for a cultural organization, most likely for little or no pay, has created considerable resentment among students” (Cuyler & Hodges, 2016, p. 77). Requiring students to earn credit for underpaid or unpaid internships is equivalent to requiring students to pay to work (Frenette, 2013). Students who must work to support themselves often do not have the option of cutting back hours at a paid job to participate

in an unpaid internship (Hora, 2019). This presents both a financial and a time barrier. The need to work is one of the most common barriers to participating in an internship (Hora et al., 2020; Wolfgram et al., 2021). If a student is working and attending school full-time, it is unlikely that they also have time to engage in an internship. However, if the internship were paid, the student might have the option to either leave their job or scale back their work hours since the income provided by the internship could potentially replace the income from the job.

While there is evidence to suggest that internships can have an impact on career outcomes (Daniel & Daniel, 2013; Frenette et al., 2015; Miller et al., 2022), there are also issues around equity and access to internships. The ability to undertake an unpaid internship is a privilege not possible for everyone. Hora (2019) points out that “too many students lack the financial resources, social connections and time to find and pursue an internship” (para. 8). Lack of social networks is another common barrier to securing an internship (Hora, 2019; Shade & Jacobson, 2015; Wolfgram et al., 2021). Several studies have pointed out that students who participate in unpaid internships are more likely to receive financial support from family (Frenette et al., 2015; Samdanis & Lee, 2019; Shade & Jacobson, 2015;). Unpaid internships are typically only feasible for students who have the financial resources to take on unpaid work, which can lead to unequal socioeconomic and racial representation (Medina-Perez, 2019). “Lacking significant household wealth, families of color in particular often struggle to ensure their child doesn't go into debt for college or working an unpaid internship (Smith, 2019, para. 5). Darren Walker (2016), President of the Ford Foundation raises the point that internships have the ability to alter a young person's career path, but that while some students have the means and support to accept unpaid internships, others must use that time to accept jobs in areas such as food service to pay their bills. Silva (2021) states that “unpaid internships deny opportunities to those individuals who could have benefitted from them the most, while reserving this valuable career experience for those who seemingly already possess substantial economic opportunity” (p. 1288). The Strategic National Arts Alumni Project found that Black and Hispanic alumni were less likely to complete an internship while in school compared to white alumni (Frenette et al., 2015). The study also found that first generation college students were less likely to do an internship than students whose parents attended college. Additionally, Silva (2021) found that students whose parents have advanced degrees are more likely to engage in unpaid internships possibly because they are more likely to have parental support. Women are also more likely to engage in unpaid internships (Frenette et al., 2015; Shade & Jacobson, 2015). “Unpaid or underpaid work reproduces class inequalities, as those who can afford it can...gain access to better career opportunities. Underpaid internships are considered as ‘luxury’ and known as the ‘third degree’, as they follow postgraduate education” (Samdanis & Lee, p. 891).

As the talent pool grows and many internship applicants have bachelor's and master's degrees (Shade & Jacobson, 2015), both paid and unpaid internship opportunities are harder to come by. It is also common for arts students to engage in multiple internships (Cullinane & Montacute, 2018; Daniel & Daniel, 2013; Frenette et al., 2021), which means internship applicants may be competing with candidates who have degrees and prior internship experience making the market very competitive. While unpaid internships can perpetuate inequality in the field of arts administration, so can the employer expectation that recent graduates have internship experience. Students often engage in unpaid internships in order to gain the qualifications to enter the paid workforce (Daniel & Daniel, 2013; Shade & Jacobson, 2015). However, if employers expect

candidates for entry level positions to have previous internship experience including unpaid internships, they are preventing the field from being accessible to all. According to data from the Department for Digital, Culture, Media & Sport, 92% of workers in the United Kingdom's creative economy come from privileged backgrounds (Samdanis & Lee, 2019)

Differences in Quality of Internship Experiences

Not all internships are created equal. Some are thoughtfully designed with clear learning objectives, while others provide less meaningful opportunities for students to engage in the experience (Miller et al., 2022). Unfortunately, some organizations look to interns as inexpensive sources of labor instead of focusing on the learning outcomes (Frenette, 2013). When students engage in meaningful internships they have the ability to expand their professional networks and gain valuable experience. On the flip side, when students engage in internships where host organizations have put little thought into the intern experience and learning objectives, they will often find themselves exploited with little value to take away from the experience (Samdanis & Lee, 2019). Internship qualities including mentoring, clarity of expectations and relevance to major have been linked to stronger educational outcomes (Hora et al., 2020). Mismatches between an intern's expectations and actual experience can also lead to disappointing learning outcomes (Frenette, 2013). Students report various supervision structures with some receiving hands-on training and mentoring and others receiving complete autonomy with little guidance (Hora et al., 2020). This may lead interns to feel more like employees rather than interns due to the lack of mentoring. While internships are often positioned as a win-win for students and employers, there are claims that some internship employers "are concerned only slightly with a person's education and are exploitative" (Frenette, 2013, p. 367).

Another issue regarding the quality of an internship experience is the lack of consensus regarding the definition of what constitutes an internship. According to the National Association of Colleges and Employers (NACE), students, employers and universities may have differing definitions of what an internship means. As a result, NACE has proposed the following definition of an internship:

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 (2018, para. 5).

NACE's definition alludes to the benefits of the internship being for the student as opposed to the employer. This echoes the U.S. Department of Labor's primary beneficiary test for unpaid interns. The primary beneficiary test is based on seven factors including the connection between the internship and the intern's academic work and the criteria that an intern's work complement and not displace paid employees (U.S. Department of Labor, 2018). NACE has additional criteria for an internship including that the skills learned be transferable to employment settings, that supervision is provided by an expert in the field and that the intern receive regular feedback. It is important for both universities offering and/or requiring internships and employers hiring interns to be aware of the Department of Labor requirements and the NACE guidelines. In addition to the potential for legal consequences for failure to follow the Department of Labor

requirements, both sets of criteria provide a framework for a meaningful and fair internship experience.

Increasing Internship Enrollment in the College of Fine Arts

In 2016 the College of Fine Arts at the University of Texas at Austin established a goal of significantly increasing enrollment in internship courses among undergraduates across the College of Fine Arts (COFA). Leadership in COFA believed that internships were correlated to job placement after graduation and would be valuable experiences for students, so a decision was made to focus on increasing participation in internships. At the time, only one of the undergraduate COFA majors outside of the teaching certification majors required an internship. That was the design major. Many students were unaware that COFA offered internship credits through Fine Arts Career Services as those courses were offered under a college level course prefix that was not associated with any school, department or major within the college. The College of Fine Arts engaged in several strategies to increase awareness and access to the COFA internship courses. The main strategies engaged were:

1. Promotion of the new Minor in Arts Management and Administration (MAMA).
2. Creation of a need-based scholarship to support costs associated with internships.
3. Offering summer internship courses through the university extension program at a reduced tuition rate.
4. Moving internship courses online to avoid scheduling conflicts with required courses and time spent at the internship site.
5. Working with advisors to ensure that students were aware that the internship courses existed and could be counted towards major upper division coursework.

Minor in Arts Management & Administration

The Minor in Arts Management & Administration (MAMA) was launched in the fall of 2016. This became the second program in the College of Fine Arts outside of the teaching certification programs to require an internship. One reason for the creation of the minor was to provide students with more employability skills through arts administration courses and an internship experience. Through this minor many students also learned about the existence of the internship courses and the intern scholarship. The initial goal was to enroll 75 students in the minor, but by 2019 the enrollment was close to double that goal. The Minor in Arts Management & Administration played a major role in encouraging students to participate in internships and enroll in internship courses.

Intern Scholarship

In 2017, the Intern Scholarship was launched. The Intern Scholarship was funded by an endowment created purely to support students in internships. This endowment was possible because the Dean believed that internships were strongly correlated to job placement after college and recognized that many students faced barriers to participating in internships. He and the Assistant Dean for Development identified a donor who shared these sentiments and was aware that not all students had access to these experiences. With this, the intern scholarship endowment was born. In 2019, the endowment produced over \$100,000 to be used in the academic year to support intern scholarships. The creation of the Intern Scholarship aligns with Cuyler & Hodges (2016) recommendation that academic programs work with development staff

to raise funds to support internships. Hora (2019) also recommends providing grant funding to support internships.

An application process for the scholarship was developed to assess both financial need and professional significance. The decision was made not to use information from the Free Application for Federal Student Aid (FAFSA). The decision to not use FAFSA data was made for several reasons. One, there was an awareness that UT had both students who were undocumented and/or whose parents were undocumented. There were concerns that these students are not always able to complete the FAFSA paperwork. COFA leadership also felt that the FAFSA did not offer a full picture of a student's financial challenges. Students were asked to complete a provided budget form that asked them to disclose expenses associated with the internship including lost wages from jobs they would have to leave or reduce hours at due to the time commitment required by the internship. Students were also asked to list income including parental support and payment provided by the internship, which was unfortunately rare. Students were also asked to write both a short statement of financial need and a short statement of professional significance. The application was short and intentionally designed to not place an extra burden of work on students. Fine Arts Career Services offered Intern Scholarship info sessions several times a semester and walked students through the application process.

It was important that the scholarships provided a meaningful amount of funding that had the ability to make an internship possible for a student. Therefore, the decision was made to offer \$2,000-\$3,000 scholarships rather than offer lower amounts to a larger number of students. The scholarship provided up to \$2,000 for students doing local internships and up to \$3,000 for students doing internships outside of Austin. In rare cases students were awarded higher amounts. The scholarships were offered every semester including summers in order to provide flexibility to students. Students were also able to apply for funding before they had secured an internship as there was an awareness that the timeline for hiring interns varies significantly across organizations.

University Extension Courses

Summer was a popular time for internships as students did not have to worry about internships conflicting with class schedules and they had more options because they were not geographically tied to campus. Summer was also the most expensive time to earn credit for an internship. The University of Texas at Austin worked on a flat tuition model meaning full-time tuition was the same amount of money for 12 credit hours as it was for 18 credit hours. In the summer, most students did not enroll full-time and as a result had to pay by credit hour. In 2017, a 3-credit hour internship course in the summer would have cost an in-state resident approximately \$2,000. Because of this, the summer internship had the lowest enrollment of all three semesters. There was an awareness that students were doing internships in the summer, but that they were not getting academic credit for them due to the cost of tuition.

The University of Texas at Austin had a university extension program that was not degree granting and was geared towards continuing learners. However, it was also possible to offer university level courses through the extension program. These courses were offered with the same course number as a regular UT course and fulfilled degree requirements. The tuition was also significantly lower and programs had the ability to set their own rates. Beginning in 2018,

COFA was able to offer the fine arts internship courses through the university extension program in the summer at the rate of \$400. This was an 80% decrease from the regular university tuition rate for a 3-credit course. Another bonus of the university extension model was that the tuition was the same regardless of residency.

Moving Courses Online

Prior to fall of 2016, the internship courses had been offered face-to-face. Students were expected to attend class once a week and also work on-site at their internships. This presented several barriers. One, a student may have a course conflict with one of their major courses meeting at the same time as the internship course. The course meeting time could also conflict with the on-site internship hours. The requirement of a face-to-face class meeting also prevented students from doing internships outside of the Austin area. Ultimately, COFA decided that there were enough barriers for students seeking to participate in internships and an in-person class meeting was unnecessary. The courses were moved online and an appropriate curriculum was developed. One goal of the curriculum was to encourage students to identify professional areas where they wanted to grow and to consider how they might address those areas in the internship. Another goal was to encourage students to reflect on their experience and consider how they might discuss their accomplishments at a future job interview. The curriculum also aimed to make space for students to disclose issues where intervention by the instructor might be necessary. The online internship courses were offered every semester including summers in order to provide students with the most flexibility about when they could complete an internship.

Working with Academic Advisors

The COFA internship courses were not part of any degree other than the Minor in Arts Management and Administration. Because the courses were offered under a college prefix that was different from the departmental prefixes, many students were unaware that the courses existed. Most of the undergraduate degrees required a specific amount of upper division electives within the major area of study. Because the internship prefix did not match the prefix of their major, many students assumed the internship courses were not eligible to fulfil major coursework. The Director of Professional Programs worked closely with the academic advisors and student affairs staff within the College of Fine Arts to ensure everyone knew that students could in fact count an internship towards upper division coursework by doing a petition for substitution. The advisors also helped get the word out that these courses existed, were open to all majors, that funding was available and that Fine Arts Career Services was able to assist students with searching for and applying to internships.

Findings

The efforts above started at the beginning of the 2016-2017 academic year. By the end of the 2018-2019 academic year there was a 156% increase in enrollment in the internship courses. When the summer courses were moved to the university extension program in 2018, summer enrollment in internship courses saw a 160% increase. During these three years, extensive data was collected regarding the types of internships students engaged in, whether they were paid or unpaid, when in the undergraduate degree students were most likely to complete an internship and which majors were most likely to participate. This data was collected via an internship contract that all students enrolling in the internship courses and all students receiving an intern scholarship completed.

The data below comes from 165 internships occurring between the fall of 2016 and summer of 2019. Eighty-Seven percent of the students enrolled in a College of Fine Arts internship course and the remaining 13% either received an intern scholarship, but did not enroll in a course or voluntarily reported their internship information to Fine Arts Career Services. Students who participated in internships represented all four units in the College of Fine Arts with 30% of students being part of the Minor in Arts Management & Administration at the time of the internship (see Figure 1). It is possible some of the students did not declare the minor until after their internship or that the internship experience encouraged students to later apply to the minor.

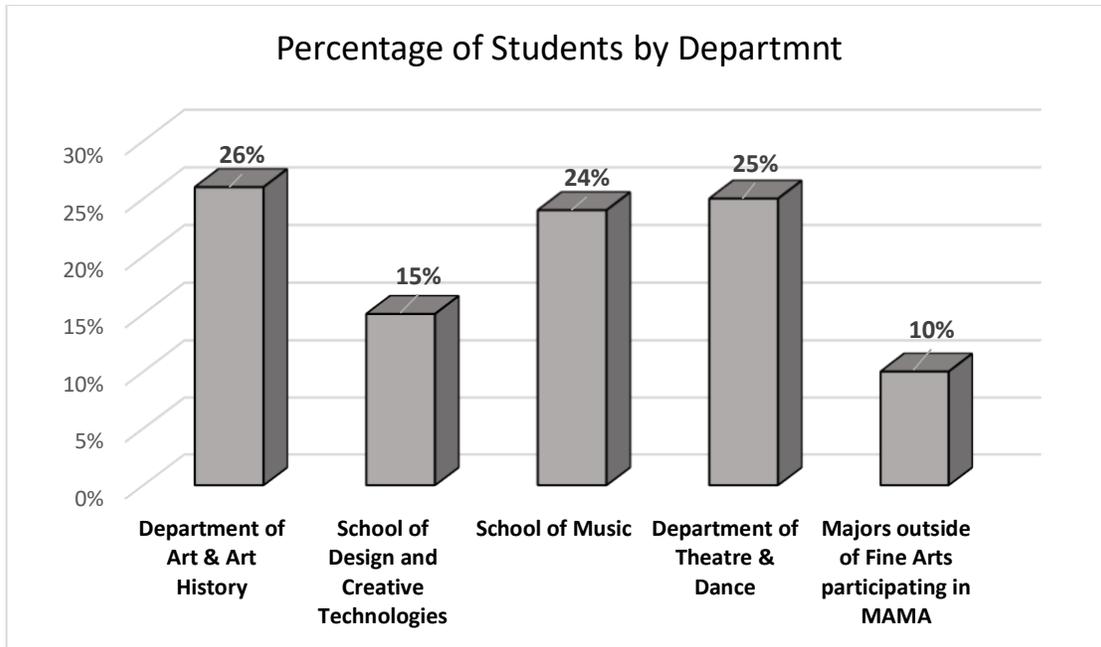


Figure 1: Percentage of students by department

Internships typically took place in the junior or senior year with freshman and sophomore internships being outliers (see figure 2). This was not unexpected. While some freshman and sophomores did engage in internships it was not common and often not encouraged unless it was the summer semester. The internship courses were designed to be an upper level course geared toward juniors and seniors. By this time, there was an expectation that students would have more specific career goals and be ready to explore internships. Academic advisors also felt that upper level students would be more prepared to take on internships while balancing their course loads. While freshman and sophomores could participate in the internship course, it was not recommended until the summer after the sophomore year in order to give students time to complete their lower division coursework.

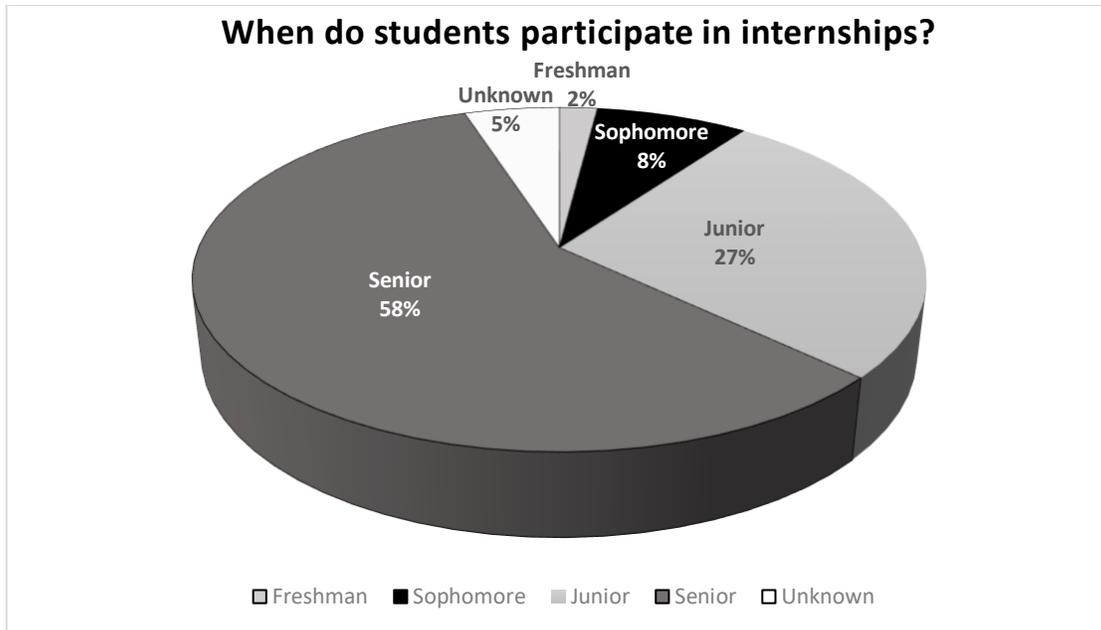


Figure 2: Enrollment by year in school

Spring and summer were significantly more common semesters for students to engage in internships than the fall semester (see figure 3.) However, it is important to remember that up until 2018 the summer internship course had been offered through the regular university schedule with a higher tuition rate. Once the summer course was moved to the university extension program, it outpaced spring as the most common semester for students to engage in an internship.

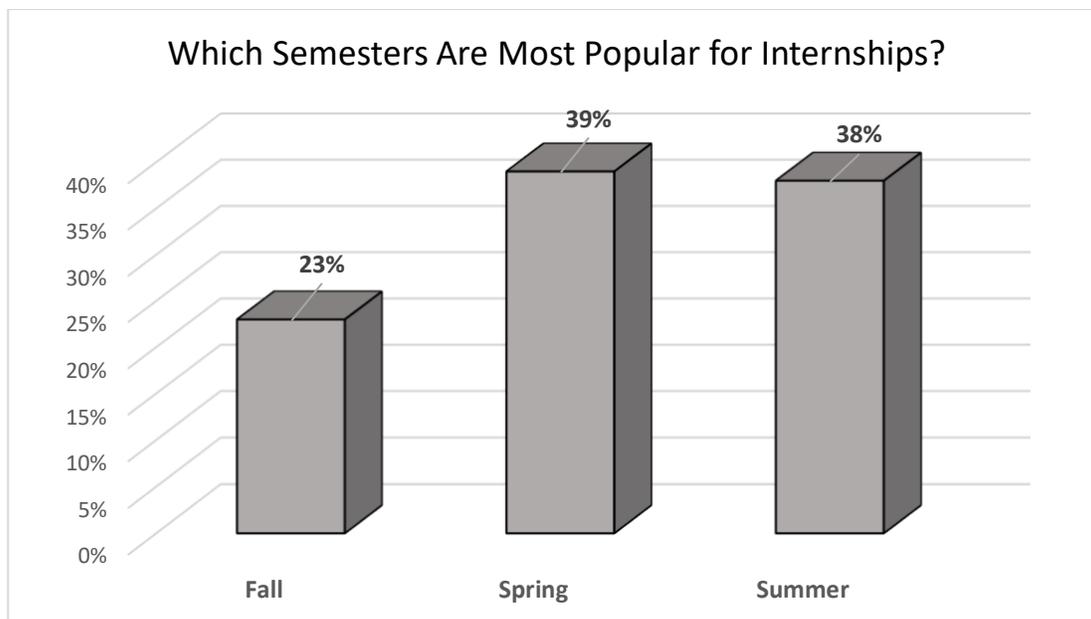


Figure 3: Enrollment by semester

Students in the College of Fine Arts engaged in a variety of types of internships, but almost all of them had an arts administration focus regardless of whether the student was part of the Minor in Arts Management and Administration. Internships with an artistic practice focus were rare. Slightly more students interned with for-profit organizations than with non-profit organizations. There had been an assumption that the majority would be with non-profits, but Austin is a city with a vibrant music and festival scene. The majority of students engaged in local internships with 70% completing their internship in Austin. Twenty-two percent of internships occurred out of state with California and New York being the most common out of state locations. The University of Texas at Austin has semester long programs in California and New York, which contributed to the number of internships in these states. International internships were rare with only 3% of internships occurring outside of the U.S.

Although the majority of students interned with for-profit organizations, most of the internships were unpaid. Seventy-two percent of internships were unpaid and 28% were paid. One might assume that for-profits are more likely to pay their interns, but in the case of COFA students this was not found to be true. Of the students interning with non-profit organizations, 31% reported being paid for their internship compared to 26% of the students interning with for-profit organizations. Fifty-five percent of the for-profit internships were unpaid compared to 44% of the non-profit internships. This could possibly be due to the location of the University of Texas at Austin. Austin is a city with a startup culture and there are a number of small startups with an arts focus. Internships in the design industry were the most likely to be paid.

It is important to note that this data is not reflective of all fine arts students who participated in internships at the University of Texas at Austin. The data reported in this article only represents students who either registered for the internship courses through Fine Arts Career Services or received an intern scholarship as those students were required to report specific data about their internship positions via an internship contract. The design major offered its own internship course and students had the option to choose between the design course and the Fine Arts Career Services courses. Students who opted to take the design course are not included in this data unless they received an intern scholarship or voluntarily reported their internship data. Many students participate in internships without receiving credit and in those cases, the university typically has no record of the internship. Reasons for not receiving credit vary and can include lack of awareness of the availability of the internship courses, lack of awareness of the courses' ability to satisfy degree requirements, not needing the additional credit hours for degree completion or not wanting to pay tuition for a summer semester even at the reduced university extension rate.

Discussion and Recommendations

One significant finding in this case study is that fine arts students had a significant interest in participating in internships. Only the students in the Minor in Arts Management and Administration were required to do an internship for credit. Just over two-thirds of the students enrolled in the internship courses were not required to do an internship for their major or minor. The reasons for this interest were not investigated as part of the data collection and would be a valuable question for future research to address. The interest in internships among fine arts students could be due to a perception that there is a connection between internships and future employment prospects. It could also be that students are seeking to obtain skills through their

internships that are not provided as part their degree's curriculum. Daniel & Daniel (2013) suggest that higher education institutions have been seeking strategies "for creative and performing arts students to bridge the gap between study and the work environment" (p. 141). Internships might be a way that students are seeking to address this gap. Another interesting finding was the focus of the internship. Although the majority of students were not part of the Minor in Arts Management & Administration, the majority participated in arts administration internships. The reasons for this are unclear. It could be that there was a lack of available internships with an artistic practice focus. Students may be seeking to further develop their administrative skills, so that they can manage their own artistic careers. Students may also believe that working in arts administration will be a more available and sustainable employment option, so they are seeking to gain practical experience before entering the job market. The decision-making process regarding how students decide what type of internships to engage in and how the internship aligns with future career goals is another recommendation for future research.

The development of the intern scholarship was a significant way the College of Fine Arts sought to make internships more accessible to a wider population of students. The feasibility of raising funds to support internship experiences will vary by institution, but it is an initiative worth exploring. Cuyler & Hodges (2016) and Hora (2019) recommend providing funds to support internships. Academic programs might consider working with development staff to accomplish this (Cuyler & Hodges, 2016). The College of Fine Arts had a donor who was passionate about the value that internships provide, but also aware of the barriers to access. Once the intern scholarship endowment was established and publicized, other donors also showed interest in supporting internships. Recipients of the scholarship were occasionally invited to speak at donor events about the impact of the scholarship which cultivated even more support. Raising funds to support internships was a deliberate decision by the Dean and Assistant Dean for Development. Their prioritization of this effort is what made it possible. Unfortunately, it seems the College of Fine Arts at UT is unique in offering intern scholarships of this size to arts students. It is recommended that field wide dialogue be cultivated around how to financially support student internships.

It is also recommended that when a major or minor includes a mandatory internship that academic programs reevaluate the number of credit hours required for the internship. This is especially true in the arts where many internships are unpaid. Requiring students to pay for credit hours in order to take on unpaid work can lead to resentment among students (Cuyler & Hodges, 2016; Frenette, 2013). Burke & Carton (2013) point out that "if an internship is required in a degree program, the characterization of an unpaid experience as being an exercise of the student's free will is inherently suspicious" (p. 125). This brings up the ethical issue of requiring students to not only engage in unpaid labor, but to also pay tuition for the experience. Lowering the number of required internship credits is one step in addressing this issue. If available, academic programs might also seek low tuition options for summer internships such as the University of Texas at Austin's extension program. It is also important to consider the support that the academic program is providing students in exchange for their tuition. If institutions charge tuition for internship credits they should be providing a thoughtful and meaningful curriculum to accompany the internship experience. Part of that curriculum should involve vetting internships to ensure that unpaid internships pass the Department of Labor's primary

beneficiary test. The National Association of Colleges & Employers' (NACE) internship definition and guidelines can be used to help ensure paid and unpaid internships provide meaningful experiences. Many academic programs require the student and the employer to sign a learning contract of some type. This contract should outline the responsibilities of the internship employer, academic institution and the student and reference the Department of Labor and NACE guidelines.

One aspect not taken into consideration during the launch of these initiatives was engaging both students and internship employers about expectations prior to the internship. One recommendation to come out of this research is that academic programs offering internships survey students before and after internships to understand how expectations and experiences align. The same can be done for internship employers. This can help academic programs better prepare both students and internship employers for the internship experience. Doing a mid-semester check-in can also be helpful. All too often faculty and program directors learn about problematic internships after it is too late to intervene. A mid-semester check-in can assist with this. It can also assist in identifying students who might not be meeting employer expectations, so they can be offered additional guidance.

In the case of the UT College of Fine Arts, students were more likely to engage in internships with for-profit organizations than with non-profit organizations. The for-profit organizations were slightly less likely to provide paid internship opportunities than the non-profit organizations. This raises the question of why are for-profit internship employers not paying their interns? It may be worth further exploring why these for-profit companies are not providing paid internships and reconsidering if students should be permitted to engage in unpaid internships with for-profit organizations. In many cases, the for-profit companies required that students enroll in credit for the internship as a condition of eligibility. This is likely so the companies can protect themselves. An unpaid intern who earns academic credit through their school is less likely to be considered an employee under the Fair Labor Standards Act (Burke & Carton, 2013). This also raises the question of whether these internship employers realize that they are essentially requiring students to pay to be unpaid workers. It is possible that some internship employers do not realize the financial ramifications of requiring students to earn credit for an unpaid internship. Academic programs might consider educating their internship employers on the costs of earning internship credit and suggesting that the employers cover these costs in the case of unpaid internships requiring credit.

The majority of students participated in unpaid internships, which is a concerning trend. In some fields these internships are replacing entry level employees (Knott, 2019), which is a violation of the U.S. Department of Labor's (DOL) primary beneficiary test. Interns are not considered employees according to the Fair Labor Standards Act (FLSA), which means they do not have the same rights and protections as employees including the right to minimum wage (Burke & Carton, 2013). In recent years, unpaid interns have challenged their classification as interns vs. employees and taken their internship host organizations to court (Knotts, 2019). One of the more high-profile cases involved the film, *Black Swan*. In that case, the court found that two unpaid interns were employees for purposes of the Fair Labor Standards Act (Johnson, 2016). The outcome in that case was influenced by the fact that the two interns engaged in menial tasks "that provided no significant educational benefit (Enghagen, 2018, p. 197).

While employer education regarding the effects of unpaid internships is needed, policy change is also needed. Knotts (2019) recommends that the U.S. Supreme Court adopt the primary beneficiary test to establish a uniform test for unpaid internships. Currently, courts have the option to adopt other tests when hearing cases related to unpaid internships (Knotts, 2019). The lack of a consistent test creates confusion for both interns and employers. The use of a consistent test would encourage employers to develop higher quality internships that are directly connected to the intern's education. The primary beneficiary test requires employers to teach and mentor interns. "Adoption of the primary beneficiary test would force the employer to create an internship program where the intern actually learns things and completes tasks that will benefit the intern in his or her future career" (Knotts, 2019, p. 195). Knotts does not discuss whether both for-profits and non-profits should be held to the primary beneficiary test. However, the Department of Labor's Fact Sheet #71, which now includes the language of the primary beneficiary test appears to be directed solely at for-profit organizations (Johnson, 2016). The first footnote on Fact Sheet #71 states, "unpaid internships for public sector and non-profit charitable organizations, where the intern volunteers without expectation of compensation, are generally permissible." However, the Department of Labor has previously indicated that volunteers at non-profit organizations cannot replace paid employees (Johnson, 2016). While not every non-profit will have the funds to pay interns, it is important that interns are protected from being exploited and used as unpaid labor. The primary beneficiary test would still allow non-profit organizations to provide unpaid internships, but would assist in ensuring that unpaid interns are provided with valuable learning experiences and mentoring. For both for-profit and non-profit organizations, ensuring that unpaid internships meet the primary beneficiary test and follow the guidelines set forth by the National Association of Colleges and Employers is essential.

Conclusion

As internships increase in popularity and it becomes more common for employers to expect college graduates to have internship experience, it is important for universities to consider barriers to internships and how they can be addressed. Many students are unable to engage in internships due to the costs associated with an internship including the high rate of unpaid internships in the arts and the cost of tuition for internship credit. Professional clothing and transportation to and from the internship can also pose a financial burden. Students may lack professional networks to secure internship placements. Lack of access to internships affects access to the arts sector and can perpetuate existing inequalities in the sector. If academic programs are going to require or encourage participation in internships, these barriers must be carefully considered.

This paper detailed how one college of fine arts sought to address these issues and increase access to internships. The combination of initiatives that the College of Fine Arts at the University of Texas at Austin engaged in including the promotion of a new minor in arts administration, the development of an intern scholarship, the offering of summer internship courses through a lower cost university extension program, moving internship courses online and partnering with academic advisors had a significant effect on increasing participation in internships. During the three years of data collection, the college of fine arts saw a 156% increase in enrollment in its internship courses. Summer enrollment saw a 160% increase once the course was offered through the university's extension program at a lower rate of tuition.

These initiatives were possible because college leadership not only recognized the importance of internships and the need to address barriers to internship participation, but also because college leadership made addressing these issues a top priority.

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