

Report of the SB1280 Workgroup

June 2024

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Summary

SB 1280, passed by the 2023 General Assembly and signed into law by Governor Youngkin, amended the Code of Virginia by adding § 23.1-906.1, relating to public institutions of higher education and internships or work-based learning experiences. § 23.1-906.1 states:

The governing board of each baccalaureate public institution of higher education shall adopt policies requiring that participation in an internship or work-based learning experience be integrated into a student's degree program so as not to extend the time to complete the degree.

SB 1280 directed the State Council of Higher Education for Virginia (SCHEV) to “convene a work group for the purpose of making recommendations on the development, adoption, and implementation of the policies required pursuant to this act.” The workgroup itself was charged to determine whether the “adoption of the policies required by § 23.1-906.1 of the Code of Virginia...is logistically and fiscally viable for each baccalaureate public institution of higher education in the Commonwealth, and in the event that such work group makes such determination, [§ 23.1-906.1] shall become effective on July 1, 2025.” SB 1280 required further that “the work group shall submit its recommendations to the Chairmen of the House Committee on Education and the Senate Committee on Education and Health no later than June 30, 2024.”

The workgroup’s report addresses each of the requirements of SB1280, in sections I-VI, as follows:

I. Introduction: describes the task of the workgroup and specifies the higher education institutions subject to § 23.1-906.1; workgroup members are listed in Appendix B.

II. Principles: articulates seven principles that guided the workgroup’s development of recommendations and interpretations required by SB 1280. The workgroup has, insofar as possible, prioritized Principles that support meeting the goals of SB1280 while recognizing variations in the logistical and fiscal viability for each baccalaureate public institution responsible for implementing § 23.1-906.1.

III. Definitions: articulates a definition of work-based learning experiences that reflects definitions utilized by the U.S. Department of Education, Virginia Department of Education and the National Association of Colleges and Employers. In addition, a set of typical characteristics is provided, and a comprehensive set of corollary standards is provided in Appendix C.

IV. Structure for non-degree work-based learning experiences that will enable the development of successful workforce skills: articulates the workgroup’s recommendation on such a structure. The workgroup recommends that rather than a single “structure,” what is needed is a multiplicity of approaches, informed in each case by institutional capacity, disciplinary knowledge and norms, and the availability of work-based learning experiences.

V. Credit Applicability: articulates the workgroup’s recommendations on two points related to the granting of credit for work-based learning experiences. The workgroup determined that it would not be feasible to set a universal minimum for work-based hours that would generate college credit. Further, the workgroup determined that it is not advisable to establish a universal maximum number of work-based generated credits.

VI. Exceptions to Board Policies: articulates a set of exceptions to the Board policies mandated by § 23.1-906.1. As a corollary to the recognized exceptions, the workgroup described a comprehensive set of barriers to implementing quality work-based learning experiences.

VII. Conclusion: “Logistical and fiscal viability of required policies for each baccalaureate institution”: describes the procedure used by the workgroup to assess the logistical and fiscal viability for each baccalaureate public institution. The workgroup made its recommendations and interpretations in sections II-VI publicly available and solicited each institution’s response. Of 14 responding institutions, eight indicated that the mandate of § 23.1-906.1 would not be viable for them. A summary of major themes from the responses is provided, and the full responses are included in Appendix E. The workgroup’s final determination is that wholesale adoption of the policies required by § 23.1-906.1 is not logistically and fiscally viable for each baccalaureate public institution of higher education.

I. Introduction

The report of the workgroup offered here advances recommendations and determinations required of it by Senate Bill 1280 (SB1280) of the 2023 General Assembly (Appendix A), which establishes a mandate for Boards of Visitors of baccalaureate institutions of higher education to “adopt policies requiring that participation in an internship or work-based learning experience (WBLE) be integrated into a student’s degree program so as not to extend the time to complete the degree” (Code of Virginia § 23.1-906.1). The workgroup members found in Appendix B also offer interpretations and stipulations on specific issues, where such is required by an enactment clause, or where the workgroup has determined it necessary to provide clarity to Boards in developing their policies.

Institutions covered by the mandate of Code of Virginia § 23.1-906.1:

Christopher Newport University
George Mason University
James Madison University
Longwood University
Norfolk State University
Old Dominion University
Radford University
University of Mary Washington
University of Virginia
University of Virginia's College at Wise
Virginia Commonwealth University
Virginia Military Institute
Virginia State University
Virginia Polytechnic Institute & State University
William & Mary

II. Principles

The intention of SB1280 is to prompt Boards of Visitors to adopt policies that maximize the integration of internships and work-based learning experiences WBLEs into baccalaureate degree programs without extending time to degree. Thus, the workgroup’s recommendations serve as broad, uniform guidelines to inform each Board’s development of policies that have specific application to an institution’s baccalaureate degrees in light of its unique capacities, circumstances, and processes.

The workgroup has responsibility both to “define exceptions” to the policies required by § 23.1-906.1 and to determine “that the adoption of the policies required by § 23.1-906.1...is logistically and fiscally viable for each baccalaureate public institution of higher education.” Therefore, the workgroup has, insofar as possible, prioritized Principles that support meeting the goals of SB1280 while recognizing variations in the logistical and fiscal viability for each baccalaureate public institution responsible for implementing § 23.1-906.1.

For the purposes of clarity, the Principles assume a common understanding of WBLE as an educational approach or instructional methodology that uses the workplace or work environment to provide learners with experiences that connect classroom knowledge and skills to real-life work activities and future career opportunities. Further it is assumed that determining the types of WBLE that might meet the criteria for a particular institution is within the purview of a Board’s policy-making responsibility in collaboration with faculty and other campus experts, in keeping with faculty governance protocols, and in compliance with accreditation standards.

Principle 1, Shared Governance

Boards should recognize and affirm principles of shared governance and the faculty’s “primary responsibility for the content, quality, and effectiveness” of curriculum as articulated in accreditation principles and standards (SACSCOC *Principles of Accreditation 2024*, [Sect. 10.4](#)). For example, given that academic programs may need to restructure their curricular requirements, sufficiently flexible timelines for compliance should be created in collaboration with academic units.

Principle 2, Time to Degree

Board policies pursuant to § 23.1-906.1 should relate “time to degree” to required credit accumulation. That is, internships and WBLEs should be integrated into students’ baccalaureate degree requirements without increasing the total required number of credits.

Principle 3, Cost of Education

Board policies pursuant to § 23.1-906.1 should provide sufficient flexibility to minimize increases in tuition and fees and to mitigate costs such as relocation, transportation, and housing.

Principle 4, Flexibility

Board policies pursuant to § 23.1-906.1 should recognize divergent approaches to degree completion and create sufficient flexibility in WBLE credit and/or formal institutional acknowledgement (e.g., transcript designation) requirements to account for specific needs of students and degree plans.

Principle 5, Educational Variation

Board policies pursuant to § 23.1-906.1 should recognize the full range of work-based opportunities appropriate to student post-graduation goals, diversity of disciplines, institutional contexts, and accreditation standards. A properly structured internship or WBLE has particular educational value insofar as it provides useful practical experience and enriches a student's depth of understanding within their major field of study. However, Boards should also have the option of implementing § 23.1-906.1 through including internships/WBLE's outside the student's major field of study.

Principle 6, Necessity of WBL Opportunities

Board policies pursuant to § 23.1-906.1 should recognize the need to meet the expected student demand for increased WBL opportunities and should calibrate any policy and its implementation to their availability.

Principle 7, Primacy of Student Success

Board policies pursuant to § 23.1-906.1 should hold students and their success as a primary value. To that end, features of required WBLE's—such as but not limited to credit-bearing vs. non-credit—should be based on internally determined factors of capacity, additional tuition burden, and potential impact on student graduation and completion.

III. Definitions

A WBLE is an educational approach or instructional methodology that uses the workplace or professional setting to provide learners with experiences that connect classroom knowledge and skills to real-life work activities and potential career opportunities. WBLEs include a variety of activities from internships to student-led enterprises. Determining the types of WBLE that might meet the criteria for a particular institution (including minimum hours of acceptable student participation) is within the purview of a Boards' policy-making responsibility in collaboration with faculty and other campus experts, in keeping with faculty governance protocols, and in compliance with accreditation standards. As a guiding framework, the following definition is offered and reflects definitions utilized by the US Department of Education, Virginia Department of Education and the National Association of Colleges and Employers:

Work-Based Learning (WBL) is an educational approach that integrates academic instruction with practical work experience. It is designed to provide students with the opportunity to apply classroom learning to real-world work settings and gain practical skills, knowledge, and experience that are directly relevant to their future careers. WBL can take various forms, including internships, apprenticeships, co-op programs, and other experiential learning opportunities. Work-based learning experiences can be paid or unpaid, with a preference for paid experiences. Exceptions will be made when external accrediting organizations require otherwise.

See **Appendix C** for internship and work-based learning standards and definitions.

WBL programs typically have the following characteristics:

- **Structured Learning:** Students engage in planned and structured activities that align with their academic coursework and career readiness. These activities are designed to enhance their understanding of academic and professional identity concepts through hands-on experiences.
- **Career Readiness:** The primary goal of WBL is to prepare students for the workforce, making them more career-ready and helping them bridge the gap between classroom learning and the skills and knowledge needed in the workplace.
- **Supervision:** Students are often supervised by professionals in the field who can provide guidance, mentorship, and feedback.
- **Reflective Practice:** WBL often includes reflective components where students critically analyze their experiences and connect them to their academic studies.
- **Credit and Recognition:** In many cases, students earn academic credit (zero or variable credit) or receive transcriptable recognition for their work-based learning experiences.

IV. Structure for non-degree work-based learning experiences that will enable the development of successful workforce skills

There is no single “structure” for WBLEs, whether degree or non-degree focused, that will universally enable the development of career readiness. The reason for this is the sheer number of curricula, potential WBLEs, and different occupation tracks that may have greatly different necessary skills. Rather than a single “structure,” what is needed is a multiplicity of approaches, informed in each case by institutional capacity, disciplinary knowledge and norms, and the extent and nature of WBLE availability. Moreover, the workgroup believes that criteria for inculcation of workforce skills should not depend on whether the WBLE is credit-bearing. A more promising approach would be to adopt a validated and comprehensive articulation of valuable 21st century workforce skills and defer to institutional boards to adopt policies that promote the inculcation of those skills to the maximum applicable extent.

To that end, the workgroup recommends that Board policies recognize, adopt, and adapt as appropriate the eight career readiness competencies as defined by the National Association of Colleges and Employers (NACE):

- Career Development*
- Communication*
- Critical Thinking*
- Equity & Inclusion*
- Leadership*
- Professionalism*
- Teamwork*
- Technology*

Detailed information on the eight NACE competencies is available here:

<https://www.naceweb.org/career-readiness/competencies/career-readiness-defined>, including resources that define the competencies, explain their validation, and offer guidance on how best to incorporate them into educational experiences.

V. Credit Applicability

SB1280 charges the workgroup with examining both the “feasibility of setting a minimum number of work hours to be equivalent to a minimum of three Carnegie credits,” and the “maximum practicable application” from a WBLE toward the “completion of a bachelor’s degree.”

Feasibility of setting a minimum number of work hours to be equivalent to a minimum of three Carnegie credits

The workgroup has determined that it would not be feasible to set such a minimum, if that means a minimum that would apply universally across all institutions or across all baccalaureate degree programs. There is simply too much variation by discipline and too much variation in potential WBLE sponsors to establish a single sensible minimum. Rather, Board policies should direct faculty and departments to establish program-specific standards that prioritize the Principles delineated above in section II, with particular attention to student success and academic quality.

Maximum practicable application of WBLE credits toward the completion of a bachelor’s degree

The workgroup has determined that it is not necessary to establish a single allowable maximum number of WBLE generated credits, for reasons both practical and normative. Principle 2 above already stipulates that WBLE credits should not extend time to degree, understood as credit accumulation. As a practical matter this already places a limit on how much WBLE can be required for any given student in a baccalaureate degree program. Normatively, as indicated by the totality of Principles in section II above, Board policies should allow for variation of practices by discipline.

VI. Exceptions to Board Policies

SB1280 charges the workgroup to "define exceptions to the policies developed pursuant to § 23.1-906.1 of the Code of Virginia, as created by this act." The workgroup has determined both a set of barriers that Boards should consider as well as a set of exceptions that those barriers yield.

A. Barriers to Implementation of Internship/Work-Based Learning Requirements

Barriers Related to Student Access

There are numerous logistical barriers that may interfere with students' ability to engage in internships and other work-based learning experiences (WBLEs). Moreover, these barriers are more likely to impact those with fewer personal and family resources. Some examples of these barriers are:

- Lack of transportation to get to internship/WBLE sites
- Lack of necessary housing, if internships/WBLEs require lodging away from campuses and/or during summer
- Lack of financial resources to afford professional attire and/or work uniforms
- Lack of access to childcare for student parents
- Lack of access to certain types of financial aid to cover tuition for credit-bearing internships/WBLEs that have to be completed during a summer session, rather than during the regular academic year
- Lack of materials and supplies to support internship access/preparation (e.g., performance auditions)
- Difficulty scheduling time for internships/WBLEs, particularly for students who already have to work to afford tuition
- Students with various disabilities may be unable to engage in certain types of internships/WBLEs and/or unfairly disadvantaged in an application process
- Students may feel unprepared for an internship experience when it is feasible for them in their program of study
- Transfer students may have insufficient time to explore and apply for WBLE, particularly competitive opportunities
- Transfer students may encounter difficulty in receiving credit for a WBLE completed prior to transfer
- Although virtual internships/WBLEs could alleviate some of these problems, they create barriers for students with restricted internet access
- Partnering sites that offer internships/WBLEs would have discretion about which students they accept, which could lead to some students being unable to secure an internship/WBLE and complete their degree program.
- Requiring pay for internships/WBLEs will still leave several students unable to access such experiences. For instance:
 - Some international student visas prohibit paid experiences off-campus

- Certain disciplines, such as healthcare-related fields, have restrictions on whether payment can be provided (and if so, how much) for WBLEs completed as part of an educational program
- Some students will still not be able to forego higher-paying employment outside of school to take on lower-paying internships/WBLEs.

Barriers Related to Capacity to Provide Internships/WBLEs

Barriers to creating a sufficient number of internships/WBLEs to satisfy the needs of all students earning a degree at 4-year public colleges/universities in Virginia exist at the level of both partner employers and institutions. Some of the barriers related to employer sites include:

- Virginia’s 4-year public institutions have graduated an average of 39,210 students with baccalaureate degrees per year over the past 5 years, with a range of 38,811 to 40,339 (SCHEV C-1 Completions Report: https://research.schev.edu/completions/C1_Report.asp). The total number of graduates (including private universities) is over 50,000 students per year. SCHEV’s June 2023 report, *Description of Credit-Bearing Internships at Public and Private Institutions of Higher Education in Virginia for Academic Years 2019-2022* (<https://www.schev.edu/home/showpublisheddocument/2893/638230260015470000>) indicates that fewer than 5% of enrolled students currently engage in credit-bearing internship activity. Substantial efforts at increasing the current level of capacity would be needed to create a sufficient number of internships/WBLEs to provide every student in VA’s 4-year public colleges/universities at least one such experience during their undergraduate program.
 - Moreover, in regard to the language in 2.iii of SB 1280 (“determine the viability of and costs associated with setting a minimum number of essential work hours to be equivalent to a minimum of three Carnegie credits and to the maximum extent practicable applying such credits toward the total credits required for the completion of a bachelor's degree”), creating 40,000 internship/WBLE slots that meet the minimum hours requirement for a 3-credit class would be even more impractical.
- If pay for internships/WBLEs is required, some employers (e.g., small businesses and non-profits) that might be interested in supporting internships/WBLEs would not have sufficient funding to cover intern pay, while also absorbing the extra costs needed to coordinate and oversee the experiences and students.
- Sites offering internships/WBLEs would have significant additional burdens, some of which are described below. These burdens would disproportionately affect fields in which workforce demands are greatest, as employees in such fields are often already overburdened and do not have the capacity to take on new tasks (e.g., Community Service Boards, which serve behavioral health needs of the underserved population in their region).
 - Hiring processes would need to be established.

- Employees would need to be trained as student supervisors/mentors.
- If employees were being used as instructors, they would need to have sufficient time to train in instruction (e.g., how to establish and appropriately assess learning outcomes).
- Internship/WBLE experiences and students require significant oversight and mentoring throughout the placement.
- Colleges/universities that are located in regions with a lack of sufficient employers to create adequate internships/WBLES will be disproportionately negatively affected.
- The legal considerations that accompany site-based internship/WBLES (e.g., establishing liability for these credit-bearing, off-campus opportunities) typically require an MOU or affiliation agreement between an institution and every site where an internship/WBLE is completed. Offering an internship/WBLE to every student would add significant administrative burden for colleges/universities.
- Colleges/universities with students enrolling in fully online programs would need to work to create internship possibilities across the entire US to accommodate the needs of those students, which would involve a substantial administrative burden.
- Some disciplines may struggle more than others to find partners to offer internships appropriate to their programs of study.
- Internships/WBLES that provide course credit represent academic coursework and, therefore, must be taught by an instructor meeting minimum requirements. Although SCHEV's minimum requirements for baccalaureate level instructors contains a clause allowing someone without a MA degree or higher to qualify, such instances require independent verification and documentation for each instructor by the institution. Thus, colleges/universities would either need to have sufficient faculty members to lead such courses or take on significant additional administrative burden to (a) train and (b) document employees at some internship/WBLE sites as instructors.
- Colleges/universities would have to take on significant additional administrative and faculty burdens, some of which are described below. Moving to require an internship/WBLE for every student in every program would lead to a need for significant increase in staffing (and, thus, funding) at most institutions.
 - Coordinating listings of opportunities for students.
 - Maintaining relationships with large numbers of employers.
 - Trouble-shooting problems that arise in the context of internships/WBLES (e.g., students who withdraw, conflicts in supervisor/trainee relationships).

B. Exceptions to Policies in SB 1280

The above outlined barriers are comprehensive, requiring governing boards to address numerous issues, including institution-specific considerations, when formulating policies

related to WBLEs. In developing policies, boards might find it beneficial to explore policies that incorporate broad-based exceptions to eliminate the necessity for repeated individual waivers of the same nature every semester.

It is important to emphasize that any list of pre-defined exceptions for a mandatory experience should not be regarded as exhaustive. Institution stakeholders should have the flexibility to specify waivers not included in a pre-approved list, recognizing that it is impossible to foresee every valid circumstance that might hinder compliance with any internship/WBLE-related policy.

Some examples of potential reasons for not requiring WBLE for any given program are:

- Inclusion of course-based learning that meets similar work-related goals as an internship/WBLE (e.g., course that involves group consultation with a “client”)
- Inability to secure appropriate internships in the region
- Inability to secure sufficient numbers of internships in the region
- Inability to provide sufficient preparation/support to students to obtain a relevant internship
- Inability to provide sufficient preparation/support to employers/organizations

There may be an additional need to enact policies that exempt individual *students* from such a requirement within any given program. Some alternative type of experience might be required, if feasible. Reasons for such an exemption include (but are not limited to):

- Completion of other work-relevant experience, such as research or service learning/volunteer experience
- Prior/current employment that is relevant to work/career goals
- Prior military experience
- International students may be prohibited from off-campus work. DACA students may be subject to limitations.
- Students who do not meet university or employer requirements (e.g., GPA, Student Conduct, Academic Standing)
- Students engaged in significant external activity (e.g., athletes, pep/marching band members)

VII. Conclusion: “Logistical and fiscal viability of required policies for each baccalaureate institution”

The third enactment clause of SB 1280 states:

That the provisions of the first enactment of this act shall not become effective unless the work group convened pursuant to the second enactment of this act determines that the adoption of the policies required by § 23.1-906.1 of the Code of Virginia, as created by this act, is logistically and fiscally viable for each baccalaureate public institution of higher education in the Commonwealth, and in the event that such work group makes such determination, the provisions of the first enactment of this act shall become effective on July 1, 2025.

The procedure adopted by the workgroup for assessing the logistical and fiscal viability for each baccalaureate public institution was as follows: through March 2024, the workgroup concentrated on preparing its report in answer to the totality of interpretations and recommendations required by the first two enactment clauses of SB 1280. These interpretations and recommendations were embodied in a “Review Draft,” which was finalized at the end of March. That Review Draft was essentially identical to Sections II-VI above, plus Appendices A-C below. On March 28, the Review Draft was distributed to chief academic officers of public higher education institutions with an accompanying memo (Appendix D). The memo stated: “The workgroup is asking each institution to evaluate the Review Draft and to consider specifically this question: would the interpretations and recommendations developed by the workgroup render the bill ‘logistically and fiscally viable’ for your institution?” A link to a brief survey was provided; the survey asked each institution to provide (i) a yes/no answer to the underlined question, and (ii) a freeform explanation of the institution’s yes/no answer.

As of May 24, 2024, 14 institutions had responded to the survey, with yes/no answers as follows:

Yes: 6 – Longwood University, Norfolk State University, Old Dominion University, University of Mary Washington, Virginia Commonwealth University, and University of Virginia at Wise

No: 8 – Christopher Newport University, George Mason University, James Madison University, Radford University, University of Virginia, Virginia Tech, William & Mary, Virginia Military Institute

The full institutional responses are included in Appendix E. The responses were entered into ChatGPT with a prompt to analyze them for predominant themes. An analysis of all responses produced the following themes:

Acknowledgment of Existing Efforts and Initiatives

Survey comments highlight new and existing efforts and initiatives within institutions to promote internships or work-based learning experiences, indicating a willingness to support such endeavors. Ongoing strategic university planning and curriculum revisions align with the goals of SB1280.

Endorsement of the Concept

While institutions express support for the underlying goal of enhancing workforce readiness through WBLEs, eight institutions voiced reservations about the mandate's feasibility and its potential impact on existing initiatives.

Financial Burden and Resource Constraints

Many comments highlight concerns about the financial implications of implementing a universal WBLE requirement. Institutions express worries about funding to support additional staff, infrastructure, and resources needed to facilitate internships or quality WBLEs. Excessive financial burdens could disproportionately impact certain students, particularly those already facing financial challenges if exceptions or exclusions could not be enacted.

Logistical Challenges and Infrastructure

Many comments underscore logistical hurdles, including the need to scale up infrastructure, establish partnerships with employers, and manage a large volume of internships or work-based learning experiences. There are concerns about the capacity to meet the demand for such experiences, especially within specific regions or disciplines.

Support for Flexibility and Exceptions

Several comments express support for flexibility in implementing WBLE requirements, emphasizing the importance of accommodating diverse student needs and academic programs. Institutions advocate for the ability to make exceptions and tailor experiences to individual students and disciplines.

Timeline Constraints

Institutions express concerns about the ambitious timeline proposed by SB1280, suggesting that it does not allow sufficient time to develop policies, build infrastructure, and establish necessary partnerships. There's a consensus that more time would be needed to ensure effective implementation.

In light of the responses from institutions, the workgroup's determination is that wholesale adoption of the policies required by § 23.1-906.1 of the Code of Virginia, as created by SB 1280, is not logistically and fiscally viable for each baccalaureate public institution of higher education.

Appendix A: SB1280 as enacted.

CHAPTER 758

*An Act to amend the Code of Virginia by adding in Article 3 of Chapter 9 of Title 23.1 a section numbered **23.1-906.1**, relating to public institutions of higher education; degree programs; integration of internship or work-based learning experiences; policies.*

[SB 1280]

Approved April 12, 2023

Be it enacted by the General Assembly of Virginia:

1. That the Code of Virginia is amended by adding in Article 3 of Chapter 9 of Title 23.1 a section numbered **23.1-906.1** as follows:

*§ **23.1-906.1**. Degree programs; integration of internship or work-based learning experiences; policies.*

The governing board of each baccalaureate public institution of higher education shall adopt policies requiring that participation in an internship or work-based learning experience be integrated into a student's degree program so as not to extend the time to complete the degree.

2. That the State Council of Higher Education for Virginia shall convene a work group for the purpose of making recommendations on the development, adoption, and implementation of the policies required pursuant to this act. In making its recommendations, the work group shall (i) first prioritize internship experience and next prioritize degree-related work-based learning experience to fulfill the requirement of the policies developed pursuant to § **23.1-906.1** of the Code of Virginia, as created by this act, but also permit non-degree work-based learning experience to fulfill the requirement of such policies; (ii) provide a structure for non-degree work-based learning experiences that will enable the development of successful workforce skills; (iii) determine the viability of and costs associated with setting a minimum number of essential work hours to be equivalent to a minimum of three Carnegie credits and to the maximum extent practicable applying such credits toward the total credits required for the completion of a bachelor's degree; (iv) consider what criteria in experiential learning might meet the definition of work-based learning experience; and (v) define exceptions to the policies developed pursuant to § **23.1-906.1** of the Code of Virginia, as created by this act. The work group shall submit its recommendations to the Chairmen of the House Committee on Education and the Senate Committee on Education and Health no later than June 30, 2024.

3. That the provisions of the first enactment of this act shall not become effective unless the work group convened pursuant to the second enactment of this act determines that the adoption of the policies required by § **23.1-906.1** of the Code of Virginia, as created by this act, is logistically and fiscally viable for each baccalaureate public institution of higher education in the Commonwealth, and in the event that such work group makes such determination, the provisions of the first enactment of this act shall become effective on July 1, 2025.

Appendix B: Workgroup Membership

Institution	Workgroup Member	Title
Christopher Newport University	Sarah Hobgood	Director of the Center for Career Planning
George Mason University	Keith Renshaw	Associate Provost for Undergraduate Education
James Madison University	Steven Whitmeyer	Associate Dean for Research & Scholarship
Longwood University	David Shoenthal	Associate Provost/Vice President for Academic Affairs
Norfolk State University	Marshall Thompson	Vice Provost for Academic Effectiveness
Old Dominion University	Barbara Blake	Executive Director, Monarch Internship and Co-Op Office and Monarch Internship Humanities Academy
Radford University	Jeanne Mekolichick	Associate Provost for Research, Faculty Success, and Strategic Initiatives
University of Mary Washington	Kimberly Young	Associate Provost for Career Workforce
University of Virginia	Alena Herklotz	Assistant Director for Academic Compliance for Institutional Research and Analytics
University of Virginia's College at Wise	Sabrina Qureshi	Dean of Academic Programs & Curriculum
Virginia Commonwealth University	Erin Webster Garnett	Associate Vice Provost for Relevant, Experiential and Applied Learning
Virginia Military Institute	Ammad Sheikh	Director of Career Services
Virginia State University	James Edwards	Special Assistant to the Provost
Virginia Tech	Rachel L. Holloway	Vice Provost for Undergraduate Academic Affairs
William & Mary	Kathleen Powell	Chief Career Officer Associate Vice President for Advancement
Institution	Workgroup Coordinator	Title
State Council of Higher Education for Virginia	Joseph G DeFilippo	Director of Academic Affairs
State Council of Higher Education for Virginia	Alisha Bazemore	Assistant Director of Innovative Work-Based Learning Initiatives

Appendix C: Internship and Work-Based Learning Standards and Definitions

The Council of Presidents' Academic Workgroup on Data Governance proposed work-based learning standards and definitions. This information was shared previously for review and consideration by the SB 1280 workgroup and may be considered as a reference source for undergraduate WBLE.

Internship: Internships are a form of experiential learning that integrates knowledge and classroom theory with practical application and skills development in a professional setting. They are supervised and structured work experiences that are time-limited and ideally project-based with a tangible outcome. Through internships, students can explore career interests, build transferable skills, establish professional networks, and engage in personal reflection. Though not always tied directly to one's major or course of study, internships often complement or supplement academic pursuits, leadership experiences, or other study interests. Internships also allow employers to train and evaluate talent while building a pipeline of future professionals.

Apprenticeship: Programs that train individuals in a specific trade or profession through classroom learning and hands-on work experience. They are common in skilled trades and also available in professional industries, typically lasting one to six years. These programs offer many benefits, including on-the-job training, payment from the start of work, and a direct connection to classroom knowledge. In addition, they provide a valuable pathway to gain skills and experience in a specific field, leading to increased job opportunities and earning potential. Registered apprenticeship programs are industry-vetted and approved and validated by the U.S. Department of Labor or a State Apprenticeship Agency. They allow employers to develop and prepare their future workforce while individuals gain practical work experience and education in a structured and supportive environment.

Cooperative Education (Co-Op): Cooperative education, or "co-op," is a structured approach to education that combines classroom-based learning with practical work experience. This program sometimes provides academic credit for a structured job experience and typically alternates a semester of academic coursework with a semester in a work placement with a sponsored organization. The co-op experience directly links to academic coursework the student completes and the practical application of knowledge in the workplace. Students receive paid or unpaid on-the-job training in approved business, industrial, and service firms as part of their program of study. Co-op provides a flexible approach for employers to evaluate staffing needs.

Field Placement, Practicum, or Clinical Experience: A course of study that involves the application of learned theories and concepts in a supervised practice-related environment. Reflection of work is present, and usually these experiences are linked to

professional programs. Typically, students receive credit (and may be paid or unpaid) and/or are evaluated for their placement experience. Placements/practica may include ongoing classroom instruction or act as culminating experiences. This WBLE includes clinical placements.

Field experiences may be directed or mediated by the instructor and include a range of time-intensive endeavors that require varying levels of student interaction. Student teaching is a practicum placement in elementary or secondary school.

Research: Research experiences occur across a continuum, from classroom-based inquiry to advanced investigative research design and implementation. Undergraduate research is defined by the Council on Undergraduate Research as a mentored investigation or creative inquiry conducted by undergraduates that seeks to make a scholarly or artistic contribution to knowledge.

Service Learning & Civic Engagement: Service Learning is an intentional teaching strategy that engages students in organized service activities and guided reflection. The service activities benefit the community and, in combination with reflection and other classroom-based learning activities, enhance the academic curriculum of participating students. Students develop knowledge, skills, and values that are both personally enriching and beneficial to society. The connection to work based learning should be evaluated to ensure that knowledge and skills to real-life work activities and future career opportunities are gained through such experiences.

Subcategories of WBLE

Academic Civic Engagement refers to course-based experiential learning that engages students in learning activities that cultivate the knowledge, skills, values, and competencies needed for effective participation in a democracy. Academic civic engagement may include both academic civic engagement with service and academic civic engagement without service.

Co-Curricular Civic Engagement (i.e., non-credit bearing) refers to experiential learning that occurs outside the academic curriculum and engages students in organized service activities that help to address community-identified needs.

Entrepreneurship: Entrepreneurship is the process by which individuals, or a group of individuals (entrepreneurs) identify an opportunity or problem to solve, then develop and implement solutions, either by bringing a new product, service, or process to the market, or by substantially improving an existing good, service, or method of production.

Project-Based Learning & Micro-Internships: Project-based learning is an instructional methodology that encourages students to learn and apply knowledge and skills through an engaging experience. This experience presents opportunities for deeper learning in-context and for the development of important skills tied to college and career readiness. Experiences may produce a deliverable output such as a report, grant proposal, project,

presentation, art exhibit, recital, dramatic performance, or other relevant components. It may also include a class project with a sponsor or a company.

Micro-internships are short-term paid projects that focus on a specific need. These opportunities help students develop new skills, explore careers, and build professional networks.

Public service: Public service is the application and provision of institutional resources, knowledge or services that directly benefit the community. Public service may entail the delivery of expertise, resources, and services to the community. This work is designed to help students understand and address the needs of the community through a real-world project.

Social entrepreneurship: Social entrepreneurship uses a similar approach to address and solve societal, community, environmental, and/or cultural issues.

Voluntarism and community service: Voluntarism and community service are performed by students for community benefit. This service can be but is not necessarily integrated with a particular program of study. This may include structured projects (days of service), smaller group projects, fundraising events, or individual volunteerism, which is acknowledged by the campus.

Sources: The workgroup drafted and synthesized these definitions using resources from the Council of Presidents, SCHEV Description of Credit-Bearing Internships at Public and Private Institutions of Higher Education in Virginia for Academic Years 2019-2022 (2023), the National Association of Colleges and Employers (NACE), and the National Society for Experiential Education (NSEE).

SCHEV report: *Description of Credit-Bearing Internships at Public and Private Institutions of Higher Education in Virginia for Academic Years 2019-2022 (June, 2023):*

<https://www.schev.edu/home/showpublisheddocument/2893/638230260015470000>

Appendix D: March 28 Memo to Chief Academic Officers



Alan Edwards
Interim Director

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March 28, 2024

To: Chief Academic Officers of Virginia Baccalaureate Public Institutions

From: Alisha Bazemore, Assistant Director for Innovative Work-Based Learning Initiatives
Joseph G. DeFilippo, Director of Academic Affairs

Subject: **“Review Draft” Report of the SB1280 Workgroup and Survey**

This memo comes to transmit the Review Draft of the SB 1280 workgroup. As you know, the workgroup has been meeting regularly since last August, first to determine the parameters of the report it is required to submit to the General Assembly, and then to deliberate through several iterations of its draft report, one of which was recently reviewed by IPAC. The Review Draft is being provided to you now for the purpose of soliciting each institution’s response to the workgroup’s recommendations.

The third enactment clause of SB 1280 states:

That the provisions of the first enactment of this act shall not become effective unless the work group convened pursuant to the second enactment of this act determines that the adoption of the policies required by § 23.1-906.1 of the Code of Virginia, as created by this act, is logistically and fiscally viable for each baccalaureate public institution of higher education in the Commonwealth, and in the event that such work group makes such determination, the provisions of the first enactment of this act shall become effective on July 1, 2025. (emphasis added)

The workgroup is asking each institution to evaluate the Review Draft and to consider specifically this question: would the interpretations and recommendations developed by the workgroup render the bill “logistically and fiscally viable” for your institution? A survey has been developed to collect institutional responses, with a deadline of May 1, 2024. The survey may be accessed here: <https://forms.office.com/g/36PE2uEZzt>. Once those responses have been provided, SCHEV will engage the workgroup to collate, analyze, and distill them to inform the final section of the report, which will constitute the workgroup’s determination as required by SB 1280. The workgroup’s report is due to the General Assembly by June 30, 2024.

Please note that the Review Draft includes in appendices both the final language of SB 1280 and the list of workgroup members.

Thanks for your attention. We look forward to receiving your institution’s survey response by May 1.

Advancing Virginia Through Higher Education

Appendix E: Institutional Responses to the Viability Survey

Question: Would the interpretations and recommendations developed by the workgroup render the bill “logistically and fiscally viable” for your institution?

Response: [] Yes [x] No

Explanation for response:

There are several issues with this, among them:

- A lack of funding/resources to implement and maintain;
- Implementation timeline; and
- Mandate on all students.

Question: Would the interpretations and recommendations developed by the workgroup render the bill “logistically and fiscally viable” for your institution?

Response: [] Yes [x] No

Explanation for response:

George Mason University shares the goals of SB 1280 to enhance graduate workplace readiness, and we appreciate the opportunity to respond to this bill with regard to implementation. Our large number of undergraduates (over 25,000) raises significant fiscal and logistical concerns regarding mandatory internships or work-based learning programs. Implementing such a requirement would necessitate a substantial increase in staff. Below is a breakdown of our specific concerns:

- 1) Staffing Demands: The sheer volume of students (graduating by the thousands each year) would require a substantial funding increase for various roles. This includes employer development, career advising, internship/placement coordination, and instructors. These staff would source job opportunities, assist students in their job search, facilitate supervisor orientations, manage the 3-credit coursework, and evaluate experiences.
- 2) Limited In-State Opportunities: If all Virginia public universities require such experiences, the state might struggle to provide enough placements. For example, of the over 50,000 internships posted on Mason's platform last year, only a fraction (less than 10%) was located in Virginia.
- 3) Student Preferences: Our students gravitate towards paid, local, in-person internships with established companies. This bill could force them to pursue opportunities outside Virginia, potentially hindering efforts to retain graduates within the state.
- 4) Degree Completion Delays: Internship availability often aligns with employer needs, not necessarily student graduation cycles. Unlike some universities, Mason graduates heavily in May, August, and December. This bill could extend some students' time to degree completion if internship opportunities don't coincide with their graduation timelines.
- 5) Financial Burden: The financial impact would disproportionately affect certain student populations. Majors in humanities, social sciences, and other fields may have difficulty securing paid internships. These students, often already facing financial challenges, would bear the cost of the internship (transportation, housing, attire) on top of the academic credit hour fees. Implementing this bill would necessitate significant financial support structures and revisions to existing financial aid programs.

By outlining these concerns, George Mason University hopes to contribute to a well-rounded discussion on SB 1280's implementation. Please know that this institution strongly believes that students thrive when they are able to engage in experiential learning outside of the classroom,

but when this experience is required of every student, the levels of activity necessary to ensure “compliance” with the policy are simply out of line with the reality of running a large public, very diverse, institution.

Question: Would the interpretations and recommendations developed by the workgroup render the bill “logistically and fiscally viable” for your institution?

Response: [] Yes [x] No

Explanation for response:

Virginia Senate Bill SB 1280 establishes a mandate for Boards of Visitors of baccalaureate-granting public institutions in the Commonwealth to “adopt policies requiring that participation in an internship or work-based learning experience (WBLE) be integrated into a student’s degree program so as not to extend the time to complete the degree.” Overall, JMU supports the ambition to increase WBLE opportunities for all undergraduate students, as we recognize that WBLEs enhance overall learning and prepare students for future careers. The bill as currently written, however, presents significant challenges to the feasibility and practicality of its implementation.

JMU wholeheartedly appreciates and echoes the SCHEV Working Group document, which effectively and comprehensively addresses the relevant definitions, barriers, exceptions, and other considerations for the implementation of SB 1280. We would like to emphasize two principal obstacles to enacting SB 1280 as written: the implementation timeline (by the start of academic year 2025-26) and the mandate that such experiences be required for all students.

- The given timeline – to develop policies and integrate WBLEs into the undergraduate curricula by the stated enactment deadline of July 1, 2025 – is untenable. For JMU to achieve a goal of increasing access to WBLE opportunities for all undergraduate students, we will need several years to scale up our infrastructure and support networks and expand opportunities by building relationships with external constituents and employers.
- The universal requirement would place an absolute and maximal threshold of 100% participation in WBLEs for institutions to meet, but our ability to reach this goal would be contingent on several factors that are out of the institution’s control, regardless of the labor or money devoted to the effort, including problems that cannot be solved logistically and financially (see specifics below). Just expanding WBLE offerings would still generate needs and challenges, even without the universal requirement, but JMU could reasonably pursue a more modest goal of increasing WBLE opportunities for every JMU student who wants one.

Other challenges to JMU achieving the SB 1280 mandate as currently written bear mentioning:

- The stated minimum of three Carnegie credits for WBLEs is unreasonable, given the variability of WBLEs across disciplines and external requirements by some national and state accrediting bodies. We agree with the goal of offering undergraduate students a way to highlight a WBLE on their transcript, but we need to maintain a variable credit option (for example, 0-3 credits) to equitably accommodate all types of WBLEs.

- JMU would incur a significant fiscal impact from the costs of developing, scaling, and maintaining the necessary internal processes, including:
 - Faculty supervision of work-based learning experiences
 - Staffing of new courses developed to accommodate the number of additional WBLEs needed
 - Establishing the necessary infrastructure and administrative support for tracking and reporting students' WBLE experiences
 - Scaling up internal supports for students to participate in WBLEs that have associated expenses (e.g., travel, housing, compensation, if not provided by the employer, and other professional expenses) to provide equitable opportunities for all.
- Based on data that JMU has gathered, the Shenandoah Valley region currently cannot meet the demand for WBLEs that would result from a commitment to providing a WBLE for every JMU student. Handshake (JMU's career support software) data indicates that VTOP Region 8 (JMU's region) had only 365 unique internship postings in the 2022-23 academic year, with 141 unique employers posting internships. Scaling these opportunities to accommodate a need for WBLEs for all JMU undergraduates does not seem feasible in the near future, as it would place an extraordinary burden on our employer and community partners.

It will take time to realize the goal of substantially increasing access to WBLE opportunities, but JMU believes these kinds of opportunities have clear value. We therefore endorse plans to expand, facilitate, and support WBLE access for students during their JMU career, but recognize that such efforts will require multiple years of effort and support from both internal and external sources.

Longwood University

Question: Would the interpretations and recommendations developed by the workgroup render the bill “logistically and fiscally viable” for your institution?

Response: Yes No

Explanation for response:

The Workgroup's recommendations for flexibility, broad definitions of WBLEs, and the ability to make exceptions are essential to making it "logistically and fiscally viable" for Longwood to adopt the polices as established by SB 1280. If these policies were to be implemented, we are concerned about the overall availability of WBLEs to students across the Commonwealth and increased competition for these opportunities.

Norfolk State University

Question: Would the interpretations and recommendations developed by the workgroup render the bill “logistically and fiscally viable” for your institution?

Response: Yes No

Explanation for response:

It would be "logistically and fiscally viable" as long as the institutions have allocations that support the increased costs for incorporating and managing Work-based Learning into the existing curricula.

Old Dominion University

Question: Would the interpretations and recommendations developed by the workgroup render the bill “logistically and fiscally viable” for your institution?

Response: Yes No

Explanation for response:

Our current strategic plan includes a goal stating that every graduating student will complete an internship or work-based learning by 2027. We have begun to develop the infrastructure to support this goal.

Radford University

Question: Would the interpretations and recommendations developed by the workgroup render the bill “logistically and fiscally viable” for your institution?

Response: [] Yes [x] No

Explanation for response:

Thank you for the opportunity to review and respond to the Review Draft Report of the SB1280 Workgroup. While Radford University supports the goal of giving every baccalaureate student a Work-Based Learning Experience (WBLE) as defined in the SB1280 Workgroup Report, after extensive campus conversation, we recognize that full adoption of a WBLE requirement as outlined is not logistically or fiscally viable for our institution at this point.

Career-oriented experiential learning is a defining feature of a Radford University undergraduate education. Our College of Education and Human Development has been placing future teachers in student teaching positions since our founding. Many of our health-oriented programs in the College of Nursing and the Waldron College of Health and Human Services require practica within our community. Students in programs in the College of Humanities and Behavioral Sciences and Davis College of Business and Economics complete required or elective internships. In the College of Visual and Performing Arts students participate in required professional-level exhibitions, performances, clinicals, internships and consultancies. Mentored Undergraduate Research is a signature experience for many of our students, and a feature of the Artis College of Science and Technology. Our representative to the SB1280 Workgroup, Associate Provost Jeanne Mekolichick, wrote the Council on Undergraduate Research’s Recognizing Undergraduate Research, Scholarship, and Creative Inquiry as a Career-Readiness Tool* (2023), which advocates for aligning student research experiences with the National Association of Colleges and Employers (NACE) career-readiness competencies. Our REAL general education curriculum already includes an Applied Learning requirement with the learning goal that students “explore professional practice through the application of knowledge, skills, and critical reflection.”

Source: *<https://www.cur.org/resources-publications/position-statements-white-papers/>

Our experience shows us that, even with WBLE integrated into Radford’s education, the requirements of SB1280 place too high a burden on our institution, both logistically and fiscally, to meet the expectations for every student.

We would need several years and significant additional state fiscal support to implement the plan. Although our concerns are covered in Section VI.A Barriers to Implementation, the working draft does not adequately provide support to overcome these barriers. For Radford University in rural Southwest Virginia, student barriers to participation include almost every item listed in this section, with particular emphasis of student financial burden, access to opportunities in the region and the state, and balancing degree progression with time spent

commuting to and participating in WBLEs. For our institution, the barriers to the capacity are covered in the document, with particular focus on the changes needed to update our general education program and every academic major, and the financial support needed to identify, manage, and track quality WBLEs. Given our current teaching and health experiential learning requirements, we understand the infrastructure and investment needed to cultivate and support healthy partnerships (and MOUs), train faculty and partner supervisors, compensate preceptors and clinical supervisors, and provide responsible oversight to our students.

The Working Draft could be improved if there was clarity in several areas:

- Could a WBLE requirement be fulfilled with the list of experiential learning activities listed in Appendix C, or is the expectation the more narrowly defined “internship” referenced in other parts of the document?
- Does a WBLE need to be an individually-mentored experience, or could team-based projects or experiences fulfill the requirement?
- Must a WBLE be off-campus, or could client driven course-based projects or external consultancies meet the requirement?

We look forward to working with the Commonwealth and the State Council on Higher Education to Virginia to support and fund WBLE for all of our students. Radford University will continue to be a leading institution in providing high-quality Work-Based Learning Experiences.

University of Mary Washington

Question: Would the interpretations and recommendations developed by the workgroup render the bill “logistically and fiscally viable” for your institution?

Response: Yes No

Explanation for response:

We already have a general education requirement that aligns with SB1280 and the workgroups' interpretation where by more than 95% of students have such an experience. A small tweak to what counts would quickly bring this to 100%.

The workgroup did nice work on this!

V-TOP support must continue if the goals of SB1280 are to be met.

Question: Would the interpretations and recommendations developed by the workgroup render the bill “logistically and fiscally viable” for your institution?

Response: [] Yes [x] No

Explanation for response:

UVA shares the important goals of SB1280, which aims to advance workforce preparation for undergraduate students at Virginia’s public baccalaureate institutions. Enabling students to achieve their professional aspirations is core to our mission, and we work continuously to improve our curricula and co-curricular offerings to ensure our students graduate with the cutting-edge knowledge and skills they need to excel in the modern workplace. So we applaud the spirit of SB1280. However, a universal WBLE requirement would directly detract from our efforts to expand WBLEs by requiring the development and implementation of elaborate systems of requirements, exceptions, and waivers across dozens of degree programs and thousands of students each year, drawing on the very resources currently dedicated to increasing WBLEs and workforce preparation.

The proposed universal WBLE requirement would require UVA to develop new policies through our faculty governance processes, including: policies about the elements needed for an activity to satisfy the WBLE requirement, such as those related to learning objectives, supervision, and assessments; policies about criteria for exemptions by degree program; policies about criteria for individual student waivers; and policies governing numerous other issues related to WBLE activities, employer responsibilities, and the relationship between WBLEs and coursework.

Implementing each of these policies would require significant new administrative structures and processes. We would need to convene faculty committees, supported by administrative staff, to review each of our approximately 80 baccalaureate degree programs to determine possible exemptions; we would also need to devise and implement a process for appealing those decisions. Additional administrators would be needed to review student requests for individual waivers — with over 17,000 undergraduate students, this will be intensive, ongoing work. The greatest administrative burden would lie in the need to review specific WBLEs — including their learning objectives, supervision, and assessments — to determine whether they appropriately contribute to education and workforce participation. Such reviews would be crucial to ensuring that a WBLE requirement is meaningful rather than a simple box-checking exercise. A new administrative team would be needed just to perform those reviews, given that (even with exemptions and waivers) it is likely that thousands of students would need to satisfy this requirement each year, through what could be thousands of distinct WBLEs.

UVA strongly affirms the value of WBLEs. We believe that the best strategies for expanding WBLEs are those that are currently underway at UVA: promoting the value of WBLEs to our students; developing partnerships with local, state, and national employers; designing

innovative ways to incorporate WBLEs into existing curricula; and identifying and alleviating barriers to participation in WBLEs. We have just launched a task force that will deliver a report in August as to additional strategies for increasing WBLE opportunities across our undergraduate programs. The administrative work needed for compliance with a WBLE requirement would detract from our current efforts in this area, require a significant expansion of our administrative staff, and place additional administrative burdens on faculty. Even with these substantial costs, the net result would likely be fewer high-quality WBLE opportunities than we would secure if we focused our efforts on increasing opportunities for meaningful, beneficial WBLEs rather than on compliance with a WBLE mandate.

Question: Would the interpretations and recommendations developed by the workgroup render the bill “logistically and fiscally viable” for your institution?

Response: Yes No

Explanation for response:

Implementing policies that mandate the integration of internships or work-based learning experiences (WBLE) into a student's degree program, without extending their time to graduation, could be feasible for UVA Wise, assuming that the exceptions developed by the workgroup remain in place and adequate resources are allocated by the state to support the initiative.

Having just revised our liberal arts core, a process that reduced the credit hour requirements to facilitate timely graduation, UVA Wise has added a co-curricular internship component--rather than a 3-credit hour course--as a part of the experiential learning requirement which will be recognized on transcripts. While internships are currently optional, the College strongly prefers to maintain them as a co-curricular activity rather than converting them into credit-bearing courses, which would necessitate a more structured academic schedule.

UVA Wise recognizes the value of WBLEs and has developed partnerships with local employers to increase internship opportunities through the VTOP Innovative Internship grant. Expanding the internship program to include all students as a graduation requirement would be beneficial but would require significant additional resources. Specifically, establishing a dedicated office to manage these internships is essential but currently unfunded. Implementing such a requirement would place considerable financial stress on UVA Wise, which could be mitigated with additional state resources allocated to achieve the goals of SB1280.

Question: Would the interpretations and recommendations developed by the workgroup render the bill “logistically and fiscally viable” for your institution?

Response: Yes No

Explanation for response:

VCU is positioned to adopt policies required by 23.1-906.1 as established by SB 1280 provided that the recommendations and exceptions developed by the workgroup in the Review Draft are implemented as proposed.

Virginia Military Institute

Question: Would the interpretations and recommendations developed by the workgroup render the bill “logistically and fiscally viable” for your institution?

Response: [] Yes [x] No

Explanation for response:

VMI's "no" response is based on current state funding. SB1280 might be feasible, given appropriate funding/resources. Funding would be required for additional FT personnel plus need-based scholarships for PELL-eligible and other students with financial need. Adequate resources, coupled with sufficient time to scale up operations, could make the program feasible.

Virginia Tech

Question: Would the interpretations and recommendations developed by the workgroup render the bill “logistically and fiscally viable” for your institution?

Response: Yes No

Explanation for response:

Virginia Tech is committed to embedding experiential learning throughout the undergraduate curriculum. To that end, the university’s Quality Enhancement Plan for SACS COC accreditation, Bridge Experiences, is challenging departments to include an internship or equivalent work-based learning experience (WBLE) within degree requirements. The university set a goal of degree-embedded Bridge Experiences within 50% of undergraduate degrees by 2027. Thus, Virginia Tech agrees and supports the spirit of SB 1280. However, the bill is not logistically or fiscally feasible, with its stated preference for internships and with the lengthy list of required exceptions to implement a university-wide requirement.

The sheer number of opportunities needed for Virginia Tech students to meet the stated preference for a paid internship experience presents a significant logistical challenge to implementation. Using 2023-24 enrollment totals and estimating that half of Virginia Tech’s sophomore and junior-level students would pursue work-based learning experiences (WBLEs) during a given academic year to meet the requirements of SB1280, the university would need to support approximately 6,500 students in completing a WBLE annually. Due to curricular structures and limited opportunities in Blacksburg, experiences likely would occur during the summer – meaning an estimated 4,500 – 5,200 students each summer (estimating 70 – 80%) and 1,300 – 2,000 students during the Fall and Spring semesters.

Between 07/01/2022 and 06/30/2023, 35,450 internships and co-ops were available nationwide to Virginia Tech students through Handshake (a 19.48% increase from the previous year). Of these available opportunities, 3,971 were in Virginia (an 8.23% increase from the previous year). In the top internship and co-op locations for Virginia Tech students [1], 11,166 opportunities were available during this same period (a 12.61% increase from the previous year). Conservatively, if only 60% of the previously estimated 6,500 sophomores and juniors pursuing WBLEs are specifically seeking internship and co-op opportunities, Virginia Tech would need to support 3,900 students to secure opportunities in the competitive internship and co-op market. If each of the 3,900 students applied for five positions, that would be 19,500 applications – approximately 55% of the total number of positions available through Handshake nationwide. Students across all Virginia 4-year institutions compete for the same limited number of internships in Virginia.

Even using the breadth of possible work-based learning experiences, the barriers and exceptions detailed in the working group report identify the logistical challenges in implementing a university-wide policy. Virginia Tech is pursuing an alternative approach with curricular innovation supported at the department level, recognizing the differences across the

arts, humanities, social sciences, natural sciences, business, and engineering. Departmental faculty determine the WBLEs that best support degree learning outcomes, including the post-graduation goals of students. Departments also are best positioned to identify barriers and constraints specific to their fields, including accreditation requirements. Our ongoing work reveals the need for substantial changes to the curriculum and pedagogy to incorporate experiential learning without extending time to degree.

Finally, curriculum design does not mitigate the “hidden costs” associated with internships and WBLEs described in the working group report. The financial feasibility for low-income students to meet an internship or WBLE degree requirement is a critical barrier to implementation.

[1] Based on data from Virginia Tech’s Career and Professional Development’s Cooperative Education and Internship Program (CEIP) and the Summer Experiences/Spill the Tea survey. Locations include: Alexandria, VA; Covington, VA; Daleville, VA; Richmond, VA; Roanoke, VA; Charlotte, NC; Raleigh, NC; Washington,

William & Mary

Question: Would the interpretations and recommendations developed by the workgroup render the bill “logistically and fiscally viable” for your institution?

Response: [] Yes [x] No

Explanation for response:

Adopting and enacting policies that require William & Mary to incorporate internships or work-based learning experiences into degree programs without extending time to complete the degree is not logistically or fiscally feasible. W&M shares in the goal of SB1280 and affirms the importance of preparing our graduates to enter the workforce equipped with the skills to apply their education.

As one of the four pillars of W&M’s strategic plan (Vision 2026), W&M’s efforts in Career preparation have positioned the university as a leader in the development of lifelong learners equipped to thrive in the workforce. The university’s next Quality Enhancement Plan, Applied Learning for All, aligns with these efforts, as do several other ongoing initiatives. W&M is positioned to have the levers in place to meet the spirit of SB1280 on our own timeline without mandates from a Senate bill. And yet, should institutions be required to proceed with adopting and enacting policies stemming from SB1280’s mandates, it still would not be logistically or fiscally feasible for W&M to do so without a significant lead time and significant additional resource investments from the Commonwealth.

Preparation and adoption of resolutions related to SB1280 by the Board of Visitors would span several months, followed by months of internal policy development and establishment of appropriate plans for implementation. Modification of degree requirements to include an internship/work-based learning experience would require program modification submissions to SCHEV for every program at the university. In some cases, SACSCOC approval may also be necessary. It is likely that a new administrative team (or, at a minimum, a significant increase in staffing within one or more existing units) would be needed in the Office of the Provost in order to implement and oversee the required programming. The expense to the Commonwealth in terms of increased person-hours alone (for each of the public institutions of higher education and within SCHEV) would be exorbitant and does not seem to be a warranted use of taxpayer funds.

In closing, we reiterate W&M’s commitment to improving the workforce readiness of our graduates and agree that seeking to provide work-based learning experiences to students is a worthy goal. However, the costs and administrative burdens associated with SB1280’s mandated work-based learning experiences/internships for every degree program would not be tenable with current funding and would detract from W&M’s ongoing efforts in this space.