



UAPA Proposal on Unpaid Internships

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Executive Summary: Unpaid internships, which are typically exclusively filled by student workers, are a source of inequity and hardship for many students. By building support for our cause with other student groups and advocacy organizations, policymakers, and the public, we aim to (1) reduce the prevalence of unpaid internships (especially in the public sector) and (2) expand workplace protections for unpaid workers, to ensure students are not being subjected to exploitative or hostile work environments. Additionally, we broadly support all on-campus efforts (detailed below) that mitigate the issues associated with requiring unpaid internships as a graduation requirement.

Statement of Guiding Principles: *The following considerations are designed to make sure proposals remain within the scope and purpose of the UAPA.*

1. Is this a productive issue for the committee to be involved on?
2. Are current or prospective undergraduate students, at MIT or elsewhere, a primary stakeholder in this issue?
3. Is this issue particularly controversial or divisive, particularly among the MIT undergraduate student body?

UAPA Proposal on Unpaid Internships

Background Information:

Summary: Most internship opportunities in the Massachusetts state government are unpaid—including all internships in the [legislative branch](#) and [Governor's office](#), as well as most in the executive branch. This is a source of inequity for students who have an interest in pursuing careers in the public sector: Students who come from less-resourced backgrounds must often bear significant financial burden. This inevitably disadvantages lower-income students from being able to get relevant work experience in their fields of interest, which can have generational effects on worker economic mobility down the line. The federal minimum-wage requirements for private sector employers (the “[Primary Beneficiary Test](#)”) excludes positions in governments, removing worker exploitation protections for students; furthermore, unpaid interns and volunteers are excluded from federal workplace sexual harassment and discrimination protections. Since federal work-study dollars are used to pay part of an employee's wages (e.g. up to 75%; it depends on the school), it is not applicable for unpaid positions— federal work-study could therefore be used to cushion some of the public employers' costs from paying their interns.

On the university side, many universities require students to take unpaid internships to complete their degree programs. We therefore support any effort that would: 1) waive tuition on unpaid positions, since students are effectively “paying to work”; 2) ensure that for every degree program there is always a path to graduate without taking an unpaid position, such as through the ability to petition alternative coursework or research options; 3) ensuring all internship requirements are paid positions, either by the employer directly or funded by the university itself; 4) put mechanisms in place to track the experiences of these unpaid positions— similar to subject/class evaluations, but to ensure unpaid internship experiences are at least academically fulfilling; and 5) advertise federal work-study programs, which can partially subsidize wages for qualifying low-income students.

Relevant Actors:

Massachusetts legislative branch — The legislature will be responsible for passing any legislation. Expanding the Primary Beneficiary Test to public sector jobs and expanding sexual harassment and discrimination protections will require a bill to be passed. Funding for internships may also be allocated in the state budget. Each legislative office has agency as to how they run their internship programs.

Massachusetts executive branch — The executive offices and agencies have discretion as to how they hire interns, meaning their internship programs may be changed (i.e. interns may be

paid) without needing legislative approval per-se. The Governor may have some discretion as to how the executive budget is allocated.

Universities — Some university degree programs require students to take unpaid internships, and therefore have some influence over the terms and conditions of internships its students take. More directly, universities also typically charge tuition for internship academic credit, and also administer its federal work-study programs, which can partially subsidize wages for qualifying low-income students.

Student organizations — Since unpaid internships are typically exclusively filled by students, they are the primary stakeholder. Graduate, undergraduate, and even high school students all take unpaid positions in the government for work experience.

Undergraduate Student Stakes: Unpaid internship positions in the Massachusetts government are practically exclusively filled by students. Many students at MIT are interested in public service but simply cannot afford to work for free — potentially misaligning their ultimate career trajectories with their passions and talents.

Goal(s):

Summary: UAPA aims to make every internship position in the Massachusetts state government paid; expand the Federal Department of Labor’s Primary Beneficiary test to public sector jobs, to ensure that governmental employers are held to the same anti-exploitation standards as private sector employers; and expand sexual harassment and discrimination protections to unpaid interns and volunteers. Additionally, UAPA supports all on-campus efforts to mitigate or entirely avoid the issues associated with requiring unpaid internships for completion of any degree program.

Actionables:

Contact policymakers: Contact Massachusetts legislative offices and other state policymakers to advocate for our goals. This may come in the form of writing letters of support/opposition/request for amendments to legislative committees considering existing bills, and collaborating with policymakers to discuss the issues. Examples of policymakers may include state legislators and their staffers, executive agencies and their community outreach/public affairs/external relations teams, or any governmental employer that offers unpaid internships.

Contact other relevant organizations: There are many different organizations whose interests may align with UAPA’s on this issue. Student governments at other universities: This may be other universities’ undergraduate student governments directly (e.g. Boston University’s), coalitions of student governments (e.g. the Boston Intercollegiate Government), or graduate student governments (e.g. the MIT Graduate Student Council). Other lobbying,

community organizations, or labor unions may also support the cause. Pay Our Interns is an example, but we anticipate other community organizations that advocate for civic and democratic engagement, for worker development and educational opportunities, against wealth inequality and poverty, and similar issues to have interests that are related to the issue of unpaid internships.

Public Outreach / Media Creation: The issue of unpaid internships is not exactly well-known. To build support for our cause, UAPA might have to compete for the policy spotlight via public campaigning. For example, this may include writing articles for media publication or organizing demonstrations of support.

Working Group:

Establishment: With the passing of this proposal, the working group shall work on the outlined actionables and goals outlined. This working group has no expiration and will therefore continue until the completion of its goals.

Leadership: The working group's organization will be detailed by the Chair of External Affairs within the UAPA. All actions taken by this working group should be approved by the Chair of External Affairs beforehand. Dispute between members of the working group and the Chair of External Affairs shall be resolved by the process outlined in the UAPA bylaws.

Scope of Authority: This working group shall have the authority to pursue the above advocacy on any issue related to internships. Though this proposal focuses on unpaid internships in the Massachusetts government, this working group reserves the authority to venture to local and federal governments, non-profits, and private sector internships should it see an opportunity or need.