

U.S. DEPARTMENT OF LABOR EMPLOYMENT AND TRAINING ADMINISTRATION Bureau of Apprenticeship and Training Washington, D.C. 20213	<u>Distribution:</u> A-539 All Tech. Hdqtrs. A-544 All Field Techs.	<u>Subject:</u> <u>Code:</u> 400 Internship Program for the Professional Work Force
Symbols: TDT/MMW	Action: Due date:	

PURPOSE: To advise the field staff that the Office of the Solicitor has determined that the term “internship program” can be used synonymously with “apprenticeship program”.

BACKGROUND: The attached correspondence from Daniel T. McCarthy, former BAT State Director for Ohio, describes a need for extending apprenticeship to nontraditional areas that utilize the term “internship.” Some of these areas are:

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|---|-----------------------------|
| Dental Lab Assistant | Computer Operator |
| Medical Lab Assistant | Dietary Aide |
| Nurse Assistant | Optical Lab Assistant |
| Operating Room Assistant | X-Ray Technician |
| Data Processing | Physical Therapy Technician |
| Medical Secretary | Chemical Assistant |
| Child Care Attendant | Engineering Assistant |
| Hy-tech Occupations which have yet to surface | |

The Solicitor’s Office advises that using the designation internship program related to training in the professional work force could be accomplished without any change in the apprenticeship regulation at 29 CFR Part 29. The provisions of Section 29.4 of 29 CFR (Criteria for Apprenticeshipable Occupations) and Section 29.5 (Standards of Apprenticeship) would be equally applicable to internship programs. (SOL opinion 5/10/84).

The SOL further advises that 29 CFR 29.12 does not need to be amended to afford State Apprenticeship Councils specific authority to approve internship programs, because an internship program is basically an apprenticeship program by another name.

An appropriate Certificate of Completion for internship programs will be developed and printed. Copies will be furnished upon request.

ACTION: The field staff are advised that they may start using the term internship program in their promotional activities in those areas of the professional work force where utilization of such designation would be of assistance.

Attachments

MEMORANDUM FOR: FRED E. ROMERO
Administrator
Office of Strategic Planning and
Policy Development

FROM: WILLIAM H. DuROSS, III
Associate Solicitor for
Employment and Training

SUBJECT: Internship Programs for the
Professional Work Force

This is in response to your April 20, 1984 request for an opinion. You were concerned whether it would be proper to use the term "internship program," rather than "apprenticeship program," to describe such programs in the professional work force.

We see no problem in doing so. The purpose of the National Apprenticeship Act (NAA) is to promote apprenticeship programs. Webster's Third New International Dictionary defines "apprentice" as "one who is learning by practical experience under skilled workers a trade, art, or calling." This dictionary also defines "intern" as "an advanced student or recent graduate in a professional field...who is getting practical experience under the supervision of an experienced worker." The difference between the two terms is insignificant as each is essentially a person learning an occupation by practical experience under the supervision of an experienced worker. Accordingly, it would be entirely consistent with the NAA to use the term "internship program" to describe such programs in professional fields.

We believe this may be accomplished without change in the apprenticeship regulations at 29 CFR Part 29. You questioned whether this would require changes to provide criteria and standards for internship programs. Section 29.4 of 29 CFR establishes criteria for apprenticeable occupations. Section 29.5 of 29 CFR establishes standards of apprenticeship. These criteria and standards are equally applicable to internship programs since, as noted above, such programs are essentially similar to apprenticeship programs.

Additionally, you questioned whether completion certificates for internships could be issued. Subsection 29.5(15) provides that the successful completion of such a program by an individual shall be evidenced by an "appropriate" certificate. In the case of an internship program, this "appropriate" certificate would use the term "internship" rather than "apprenticeship."

Lastly, you questioned whether 29 CFR 29.12 needed to be amended to afford State Apprenticeship Councils specific authority to approve internship programs. This is unnecessary because an internship program is basically an apprenticeship program by another name.

U.S. DEPARTMENT OF LABOR
Employment and Training Administration
Bureau of Apprenticeship and Training
200 North High Street, Room 605
Columbus, Ohio 43215

DATE : March 13, 1984
TO : THOMAS HAGUE, Director
FROM : DANIEL T. MC CARTHY, State Director
SUBJECT : INTERNSHIP/APPRENTICESHIP

Since its inception, the Bureau of Apprenticeship and Training (BAT) has been exclusively identified with providing direction and a system of in-depth training for persons entering the crafts or trades.

The system has worked well and has established itself as an effective and viable means of furnishing the United States with a supply of qualified, highly skilled craftspersons and tradesmen. Training along these lines became known as "traditional apprenticeship" as it dealt primarily with the crafts and trades.

Within recent years a new breed of highly skilled workers has emerged in the so-called "non-traditional" areas which include the professional and para-professional segment of the work force. The Bureau of Apprenticeship and Training has recognized this surge and has turned its attention towards new apprenticeships to accommodate them.

The Bureau of Apprenticeship and Training has risen to the occasion; however, it is apparent that its identity with training for the crafts and trades still carries the dominant impression that this system exists only for this purpose and that an apprentice is a tradesman or craftsperson.

We are in need of an organized system of policies, procedures, and training for the non-traditional area, an identity other than apprenticeship.

It is therefore suggested that BAT take the leadership by adding another segment to its training responsibilities entitled "Internship". This segment falls under a title of Bureau of Apprenticeship and Training or could be changed to reflect a new approach--Bureau of Apprenticeship, Internship, and Training.

Internship/Apprenticeship (continued)

This format and guidelines of “Internship” would be similar to the apprenticeship system with the exception that the expression of internship is substituted in place of apprenticeship for training in “non-traditional” areas.

The non-traditional areas that utilize the term “internship” are:

Dental Lab Assistant	Computer Operator
Medical Lab Assistant	Dietary Aide
Nurse Assistant	Optical Lab Assistant
Operating Room Assistant	X-Ray Technician
Data Processing	Physical Therapy Technician
Medical Secretary	Chemical Assistant
Child Care Attendant	Engineering Assistant
Hy-tech Occupations which have yet to surface	

These are a few “non-traditional” occupations that may utilize the term “Internship” instead of “Apprenticeship”.

I believe that changes in 29 CFR 29 indicating apprenticeship/internship could surface.

It should also be recognized that the completion certificate would have to change so that recognition can be made for apprenticeship or internship.

The saleability of the internship concept will depend on the method of marketing utilized by the Department to industries, American Medical Association, and other associations which tend to use the term for people they train.

Best regards.

cc: R. Swain
mrg