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David L. Baker

Marie Johnson

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Social Inequity on the Network of Schools of Public Policy, Affairs, and Administration's Doorsteps: Unpaid Governmental Internships

David L. Baker

Ann Marie Johnson

California State University - San Bernardino

Social equity is embedded in the public service values of the Network of Schools of Public Policy, Affairs, and Administration (NASPAA). Yet social inequity persists in the facilitation of unpaid governmental internships by some of its accredited programs. This research explores social equity, reviews the service learning pedagogical benefits of internships, explicates the contrasting U.S. legal paradigms permitting unpaid service, and discloses the prevailing pay practice for domestic internships. It then examines the governmental internship paradigm in light of model guidelines. It normatively contends unpaid governmental internships create an access barrier for prospective interns due to their associated socioeconomic opportunity costs. Beyond the normative perspective, using national evidence from paid interns across all majors, research documents (1) more early job offers, (2) more job offers, and (3) higher first position salaries for paid interns. These findings suggest paid governmental interns likely benefit from better outcomes than unpaid interns underscoring the urgency for remedial action from the NASPAA leadership. The article proposes that reconceptualizing governmental internships to a paid only standard yields more good than harm. This pivotal innovation could rectify a long-standing, critical social equity inconsistency within some NASPAA accredited programs. Institutionalizing a paid-only standard is achievable through accreditation modifications and federal reform. Additionally, the proposed national tracking of governmental interns could better inform service-learning pedagogy. Such a data set can spur research regarding paid internships as a pipeline for increasing the representation of the socioeconomically disadvantaged in governmental agencies.

Social equity serves as one of the foundational supports of public administration along with economy, efficiency, and effectiveness (Frederickson, 2010). Within that structural support, many public service values reside (Nabatchi, 2012) and sustain beliefs that shape decisions individuals and organizations make regarding means or ends (Kernaghan, 2003). Values

matter in public administration because they provide sense-making for frameworks that guide practice (Gilliland, 2004).

Values in the NASPAA's accredited programs also matter, or at least the NASPAA says so. Despite what it advocates, occasionally it turns out that an entrenched practice is incongruent with one of the stated values. The NASPAA (2021), the authority in public service education, espouses public service values, including social equity, though accreditation standards. These attributes differentiate public administration accredited programs from other curricula and associated professions (Raffel, 2010). Historically, social equity distinguishes public administration with an abiding theme threaded through American governance (Johnson & Svara, 2015a). Even with this salience, it struggles for equal status with the competing foundational supports of economy, efficiency, and effectiveness in public administration (Norman-Major, 2011). Moreover, some of the NASPAA's accredited programs fall short of social equity in practice when they facilitate student placements in unpaid governmental internships.

This research unveils the social inequity inherent in facilitating unpaid internships. It examines social equity in public administration and its prominence within the NASPAA's embedded public service values. It notes the enduring interest in internships as an esteemed service-learning pedagogy associated with experiential student benefits. The analysis unpacks the dimensions of social equity conceptually and defines them operationally. The article also explores the contrasting U.S. legal paradigms for internships, finds the one for governmental internships warrants revisiting, and notes the prevailing pay practice across all majors. Against this backdrop, it discusses the under researched social equity barriers of access and outcomes inherent in unpaid governmental internships. The article concludes by outlining strategies to reconcile the professed value of social equity with actual practice.

The scholarship contributions are threefold. First, it spotlights an opportunity for the NASPAA to take corrective action on the unintended yet negative social equity impacts resulting from unpaid governmental internships. Second, it suggests revisiting governmental internships to reconceptualize them as *paid-only* to dissolve the existing inequitable barriers in access and outcomes. While arguments for social equity insist on fundamental fairness in the NASPAA's aspirational public service vision, systemic positive changes also are achievable from paying interns. Third, the commentary supplies the NASPAA with innovative strategies for institutionalizing paid-only governmental internships in the U.S. These include accreditation modifications, federal reform, and national tracking of governmental internships. While the research focuses on the social equity inconsistency of the NASPAA domestic accredited programs facilitating unpaid internships, it steers clear of other tangential issues. For example, it does not address the statutory omission of the primary beneficiary test for governmental internships, academic requirements, associated tuition fees, and how the recommended strategies apply to programs outside the U.S.

Social Equity within Public Administration and NASPAA'S Embedded Values

Social equity "is a pillar of public administration" (Svara & Brunet, 2005, p. 253). Combined with efficiency, effectiveness, and economy, it adds an essential normative perspective to undergird public administration (see Wooldridge and Gooden, 2009, for a discussion of the evolution of social equity in public administration). Yet, even "the most productive governments, the most efficient governments, and the most economizing governments can still be perpetuating poverty, inequality of opportunity and injustice" (Frederickson, 2010, p. 48).

The National Academy of Public Administration describes social equity as the following:

The fair, just and equitable management of all institutions serving the public directly or by contract, and the fair, just and equitable distribution of public services, and implementation of public policy, and the commitment to promote fairness, justice, and equity in the formation of public policy. (Johnson & Svava, 2015a, p. 16).

Social equity involves analyzing fundamental fairness and averting and amending disparate results from public policy and administration. For instance, empirically, social equity in public administration examines disparities concerning race/ethnicity, gender, and economic factors (Wooldridge & Gooden, 2009). Normatively, social equity commits to attacking disparity (Johnson & Svava, 2015b). It analyzes institutional structures and practices that result in disparate impacts as well as initiating remedial actions to curb unfairness (Wooldridge & Gooden, 2009). The urgent calls for social equity drive the search for injustices, promising strategies, and better recalibration of the imbalances that befall the disadvantaged (McCandless & Guy, 2020). This quest includes governmental practices that result in social inequities (Menifield, 2020).

The NASPPA promotes certain public service values through accreditation, which influences behavior, both individually and organizationally (Kernaghan, 1994). It requires embedding these values, including social equity, in its accredited programs and summarizes them through its Commission on Peer Review and Accreditation:

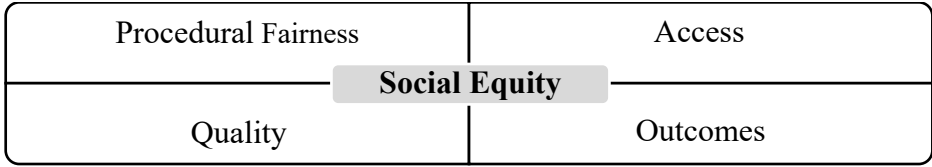
Public service values include, but are not limited to: pursuing the public interest with accountability and transparency; serving professionally with competence, efficiency, and objectivity; acting ethically so as to uphold the public trust; cultivating global, regional, and local awareness; and promoting participation and inclusiveness by demonstrating respect, equity, and fairness in dealings with members of society, stakeholders, and fellow public servants. (NASPPA, 2019, p. 2)

Johnson and Svava (2015a) assert governmental agencies should avoid increasing disparities while eliminating any unfair consequences. They highlight the work of the Standing Panel on Social Equity of the National Academy of Public Administration by unpacking four conceptual dimensions for measuring social equity: procedural fairness, access, quality, and outcomes.

These conceptual dimensions of social equity require operational definitions as provided by Johnson and Svava (2015a; 2015b). *Procedural fairness* evokes sensitivity to equal protection as well as reducing actions that negatively impact fair treatment. *Equality* relates closely to equity and refers to the state of being equal, but is different than equity. *Equity* indicates fairness or impartiality. Something could be equal and still not be fair. Closely related to procedural fairness is access. *Access* involves an inclusionary pathway forward characterized by consistency. Svava and Brunet (2005) opine that legal discretion should bend toward inclusion in borderline instances. The *quality* dimension (Johnson & Svava, 2015a; 2015b) concerns even handed treatment for everyone. It ensures that individuals do not suffer slights through lower than acceptable standards. Finally, *outcomes* in social equity consider whether policies and programs have similar impacts for groups as

well as individuals affected. Governmental intervention should reduce inequities in outcomes (Svara & Brunet, 2005). Figure 1 illustrates the contributing dimensions to social equity.

Figure 1 Johnson and Svara (2015a; 2015b) Dimensions of Social Equity



Service- Learning Pedagogy Supports Governmental Internship Benefits

Service-learning, including internships, is a valued pedagogical strategy (Kuh, 2008; National Commission on Service-Learning, 2002). Governmental interest historically traces back to the National Institute of Public Affairs (Wingo, 1937), a private nonpartisan organization attracting youth to government through internships. Enduring interest continues to find that such internships play an instrumental role in the field of public administration (D’Agostino, 2008; Lambright, 2008). They enrich academic training with practical experience. Interdependencies between the NASPAA’s accredited programs, students, and government stakeholders anchor and enable the development of experiential knowledge through such placements (Benavides et al., 2013). These assignments assist students to assimilate knowledge while building critical thinking skills (Eyler & Giles, 1999).

Pedagogically, governmental internships also involve organizational public issues imbued with democratic values. They expose students to civic engagement, intercultural knowledge and competency, and ethical workplace behavior. In turn, this promotes problem-solving experience and social capital (Elshtain, 2006). Internships encourage collaboration through embracing common interests, which facilitates breaking barriers and engaging more diversity.

Internships supply students with professional work environments. Governmental placements provide opportunities to apply theory with practice in public service delivery often gaining experience for entry positions. Typically, they furnish the following major benefits:

- Familiarize interns with professional environments (Hughes & Lagomarsine, 2015);
- Upgrade skills, knowledge, and abilities through practical applications (Grant-Smith & McDonald, 2018) thus enhancing employability;
- Improve critical thinking and analytical skills by connecting class concepts to public service duties (Kramer & Usher, 2011); and
- Enhance references, social skills, and career planning (Vélez & Giner, 2015).

Contrasting Legal Paradigms and Prevailing Pay Practice for Domestic Internships Primary Beneficiary Test

The longstanding *normal science* (Kuhn, 1996) of internships revolves around contrasting legal paradigms etched in law. According to the U.S. Department of Labor, courts have established the *primary beneficiary test* for *employee* determinations in for-profit enterprises (Wage and Hour Division, Fact Sheet #71, 2018). This test requires scrutiny of the economic reality of who is the foremost beneficiary in the intern relationship, the intern or the organization for whom the intern works. This is considered a flexible test with each case adjudicated on a fact-driven basis. If an intern is ruled an employee because the primary benefits accrue to the employer, the Fair Labor Standards Act (FLSA) (1938) mandates at least the minimum wage and overtime compensation.

The Wage and Hour Division (Fact Sheet #71, 2018) articulates seven factors courts consider when reviewing internships in for-profit enterprises. Two of the factors deal with mutual understandings between the intern and employer concerning compensation and whether the internship leads to an entitlement of a paid position. The remaining five factors address the degree to which an internship (1) furnishes similar training to an educational program, (2) integrates coursework or receives academic credit, (3) coordinates its term with the intern's academic schedule and calendar, (4) provides beneficial learning, and (5) complements or displaces the work output of other employees while providing educational benefits. Under these primary beneficiary test guidelines, for-profit interns either (a) receive compensation based on work benefitting the employer, or (b) work as unpaid labor in a predominately academic learning mode through the altruism of their employer without making major workforce contributions.

Exclusion of Governmental Internships from Primary Beneficiary Test

Curiously, the federal legal paradigm does not extend the primary beneficiary test to governmental interns. Instead, federal law grants wide latitude for governmental agencies to use unpaid internships, regardless of the primary beneficiary, and the practice is commonplace. Under the FLSA, governmental interns may be treated as volunteers (Wage and Hour Division, Fact Sheet #71, 2018). *Volunteers* are defined economically as unpaid labor (Stebbins, 2009) and are considered as serving a civic purpose (Chrysler, 2014). Governmental agencies also may employ paid interns at their discretion. This disparate treatment can go unchallenged since there is no equity standard in use like the primary beneficiary test.

Exempting governmental interns from the FLSA (1938) and labeling them as volunteers warrants reexamination. The International City/County Manager Association (ICMA) (2021), arguably publishes the most widely referenced domestic governmental internship resource. Its roots lie in the guidelines collaboratively designed and jointly adopted in 2003 by ICMA's Advisory Board on Graduate Education and the NASPAA Urban Management Education Committee. Table 1 summarizes the apparent primary beneficiary from analyzing the ICMA internship duty guidelines. On their face, these duties go well beyond unpaid volunteerism designed to complement academic programs.

Table 1 International City/County Manager Association (ICMA) (2021, pp. 1-6) Governmental Internship Duty Guidelines

ICMA Duty Guidelines	Primary Beneficiary		
	Employer	Mutual	Intern
Integrate interns as management team members			X
Utilize intern knowledge and skills	X		
Treat interns as employees engaged in organizational priorities	X		
Evaluate interns with the same system used for employees			X
Network interns with governmental professionals and regional service issues			X
Involve interns with collaboration/coordination needed for policy and service implementation			X
Task with daily duties and longer research projects	X		
Require interaction with elected officials, citizens and advisory bodies			X
Encourage use of all communication forms to various group sizes and compositions			X
Task interns with substantive work reflective of public service and management challenges	X		
Allow interns in management meetings, to shadow a manager, to participate in street level service delivery, to attend elected <u>official's</u> and neighborhood meetings, and to observe collective bargaining activities			X

Governmental interns merit compensation in exchange for the substantive work contributions they bring to their benefiting governmental agencies. The duties described in the ICMA guidelines exceed those expected from unpaid, for-profit interns working in a predominately academic learning mode without major workforce contributions. The guidelines call for incorporating interns into mission critical functions and problem-solving with broad exposure to host agency stakeholders. Governmental interns often perform work primarily beneficial to their respective public agencies (ICMA, 2021) similar to many paid for-profit interns working for private enterprise. Their assignments include duties (1) dissimilar to those in an educational environment, (2) outside the scope of coursework receiving academic credit and often not tied to an academic calendar, and (3) in lieu of hiring additional employees.

Prevailing Pay Practice for Interns

A dearth of empirical studies concerning the pay status of general internships exists (Grant-Smith & McDonald, 2018; National Association of Colleges and Employers, 2018a). While the National Association of Colleges and Employers (NACE) does broad based studies annually, the data does not separate governmental internships discretely. Further, there is no federal tracking of unpaid governmental internships. Nevertheless, a snapshot of the prevailing pay practice for internship compensation across all majors, not just governmental, points to likely social equity disparities among governmental interns.

Data from NACE's Class of 2017 Student Survey Report documents a growing domestic practice toward paid internships. Over the seven years from 2011 through 2017, 20,000+ students were surveyed annually. The number of paid general internships grew from 51.3% in 2011 to 56.7% in 2017, a 10.5% increase over 2011 (NACE, 2018b, pp. 2-3). More importantly, the prevailing pay practice (Lewin, 2003), which government often competes with for talent, is the *paid* internship. With the forgoing in mind, the following section reviews impacts arising from unpaid governmental internships along the four social equity dimensions.

Social Equity Impacts on Unpaid Governmental Internships

Internships are not mandated for the NASPAA accreditation (2014). Nonetheless, most accredited domestic programs (Reinagel & Gerlach, 2015) require and facilitate internship placement for pre-service graduates. Yet, the conventional wisdom indicates a student's ability to accept an unpaid internship is largely decided by individual socioeconomics, principally net assets, dependents, sources of income, and social supports (Burke & Carton, 2013; Edwards & Hertel-Fernandez, 2010; Grant-Smith & McDonald, 2018; Hora et al., 2019; Hughes & Lagomarsine, 2015; Johnson & Baker, 2018; Perlin, 2012; Yamada, 2002; 2016). In this section, we review paid and unpaid governmental internships by each dimension of social equity (i.e., procedural fairness, access, quality, and outcomes) from a student socioeconomic perspective.

No Appreciable Barriers for the Procedural Fairness and Quality Dimensions

No prima facie evidence exists indicating the social equity dimensions of procedural fairness and quality adversely impact unpaid governmental internships. First, governmental agencies operate under laws and regulations infused with procedural fairness. Any discriminatory recruiting and applicant screening practices do attach legal jeopardy when discovered. Consequently, procedural fairness is the norm and enforceable by legal recourse.

Second, the quality dimension of social equity calls for even-handed treatment. Substandard placements or disparate supervision over an unpaid intern's appointment linked to their socioeconomic circumstance are unverifiable. Research does not reveal empirical evidence nor anecdotal reports of governmental agencies requiring internship applicants to disclose personal socioeconomic information (e.g., net assets, dependents, sources of income, social supports, etc.). Hence, arguments regarding qualitative treatment differences among those who accept unpaid internships appear rebuttable. There are, however, negative impacts associated with the access and outcomes dimensions, which are reviewed next.

Access Dimension Barrier

Unpaid governmental internships create a socioeconomic barrier that extant research suggests falls unevenly on those qualified. Hence, an access constraint functions as an exclusionary influence (Grant-Smith & McDonald, 2018) while reducing social mobility (Curiale, 2010; Frenette, 2013). An unpaid placement “limits participation to only the students who can afford to forego wages and pay for living expenses, effectively institutionalizing socioeconomic disparities” (Edwards & Hertel-Fernandez, 2010, p. 1). Faced with the prospect of working without compensation while incurring employment related expenses (e.g., transportation costs, a wardrobe upgrade, childcare, etc.), otherwise qualified potential interns will likely screen themselves out of career building placements (Johnson & Baker, 2018). No pay often means no way. Socioeconomic hurdles collectively “create conditions for students to self-select out of internships” (Hora et al., 2019, p. 13). Furthermore, NACE (2017) confirms that the more financially affluent are more likely to complete an unpaid internship compared to students with modest and high financial needs.

An inclusionary pathway is illusory for all qualified applicants with a socioeconomic access barrier. Governmental agencies are legally defensible since all qualified may apply. Yet, because all qualified applicants have differing capacities for non-compensated work, unpaid internships undermine the public service value of social equity. They generate a disparate impact, unintentional but still discriminatory, because they have a propensity to exclude those who are less well off financially and who cannot work for free. Participation for them presents a quite different range of opportunity costs and results in an institutionally flawed service-learning pedagogy. The unpaid status of many governmental internships foreshadows widespread disappointments ominously looming over the outcomes dimension. Inequitably, some suffer grave socioeconomic hardships for an unpaid internship to little avail. This becomes apparent through job-outcomes.

Outcomes Dimension Barrier

Unpaid governmental internships too frequently result in inferior job-outcomes. Although NACE does not focus on governmental internships, it surveys graduating seniors about internship service and captures data on those who never interned. NACE (2019) (N = 3,118) finds 39.1 percent of those with a paid internship receive job offers by their June 30, 2019 commencement (referred to as *early job offers*), compared to 14.8 percent of those with unpaid internships. Another 13.1 percent of those who never interned earn job offers by the same date. These findings are huge. Although the majority of graduating seniors do not receive job offers by June 30, 2019, it means those with paid internships are 2.6 times more likely to land an early job offer compared to those with an unpaid experience. Paid interns are nearly 3.0 times as likely to obtain job offers compared to those who never interned. However, while those who interned without pay receive service-learning experience, it earns them only a 1.7% job offer rate improvement over those who never interned. The same NACE study documents that those with paid internships receive almost 50% more job offers than those with an unpaid internship.

Another NACE survey states those with paid internship experience earn higher first-position salaries than unpaid interns (2018a) (N = 3,914). Even so, unpaid interns do attain similar service-learning benefits as paid interns. They assert their internship “improved their professionalism, teamwork, communication, and critical-thinking/problem-solving skills” (NACE, 2019, p. 2). Conversely, those indicating they never interned evaluate themselves as “less proficient in professionalism, teamwork, critical-thinking/

problem-solving, leadership, and career management” (p. 2). The constructive result of similar service-learning benefits between paid and unpaid internships is laudatory. Still, it pales in contrast to the disappointingly inferior job results for unpaid interns on the social equity outcomes dimension.

Cumulatively, these findings underscore the social inequity of unpaid internship outcomes. Despite whatever socioeconomic hardships endured for the unpaid stint, the findings suggest unpaid governmental interns likely lag behind with inferior early job-outcomes in comparison to those who enjoyed paid internships. In other words, not only do they lose out on internship pay, but they also see paid interns further rewarded through (1) early job offers, (2) more job offers, and (3) higher first-position salaries. Their inferior outcomes compared to those privileged with paid internships expose a harmful practice and a fundamental disconnect with the prized notion of social equity. Those accredited programs that facilitate unpaid placements are aiding and abetting inequitable internships. Table 2 summarizes the social equity barriers for qualified governmental interns based on relative socioeconomic affluence, service-learning benefits, and job outcomes.

Table 2 Social Equity Barriers for Qualified Potential Governmental Interns

Relative Socioeconomic Affluence	Service-Learning Benefits	Job Outcomes
Access barrier: Affluence insufficiency blocks unpaid internships	Miss service-learning benefits	No outcomes from unpaid internships
Outcomes barrier: Affluence sufficiency enables unpaid internship	Attains service-learning benefits	Inferior outcomes compared to paid internships—later job offers (if any), fewer offers, lower first position salaries
No barriers: Not applicable for paid internships	Attains service-learning benefits	Superior outcomes compared to unpaid internships—early job offers, more job offers, higher first position salaries

Reconceptualization of Governmental Internships

Change is needed. The existing legal paradigm for domestic governmental internships no longer squares with the contemporary import of social equity for NASPAA accredited programs. Unpaid internships pose formidable obstacles along the social equity dimensions of access and outcomes. In response, the NASPAA could redress the discord between its espoused public service value of social equity and the inequity of widespread unpaid governmental internships in practice. It could eliminate them as an unacceptable service-learning option. This would halt the facilitation of unpaid placements by its accredited programs and disengage them from complicity in this inequitable practice. It is better to stop

unpaid internships now rather than sully the public service value notion of social equity further.

Riccucci and Van Ryzin (2017), citing Frederickson (1971), Gooden (2014), and Gooden and Portillo (2011), argue for equitable treatment in governmental employment practices. This should include a paid-only policy for interns. The proposed reconceptualization of governmental internships to a paid-only standard resolves the existing dilemma by realigning the current two-class practice to conform to the public service value of social equity. It presses corrective action while enhancing the attractiveness of governmental service (Ritz & Waldner, 2011).

Qualified students should compete for internships solely on their merit. It is inequitable that some of those qualified must exclude themselves from consideration because they cannot work for free. Clearly, if socioeconomic opportunity costs block some from accepting unpaid placements, everyone is not treated equitably. Based on the earlier NACE data, those who do accept unpaid internships, tend to experience disparate results through inferior job-outcomes compared to those in paid internships. Johnson and Svava (2015b, p. 266) argue that “Social equity does not accept the idea that certain . . . [individuals and] . . . groups must be limited to poorer outcomes.” Further, it obligates the exposure of unfair treatment to remediate disparities and promote social equity. The NASPAA’s leadership could close the chasm of disparate outcomes concerning unpaid governmental interns. Urgency is required because (1) internship participation is widespread, and (2) unpaid posts are commonplace.

Response to Predictable Reconceptualization Resistance

Paid-only governmental internships may result in some negative resistance similar to other corrective paradigm shifts (Kuhn, 1996). The lack of graduate public administration data will concern some. But the Department of Labor does not report governmental internship data currently. Additionally, the available empirical research across majors focuses primarily on undergraduate internships broadly (Grant-Smith & McDonald, 2018). That data lacks the granularity to reveal the distinctive contours of even public administration undergraduates. Besides, the NASPPA only accredits graduate programs. Thus, even though undergraduate internship studies supply germane insights, that data are only suggestive, not definitive of patterns residing within Master of Public Administration and Master of Public Policy programs. Unpaid work, including unpaid governmental internships, requires large-scale studies to analyze trends. This observation accentuates the need for national data tracking.

The financial sustainability of a paid-only standard and potential loss of some service-learning opportunities will raise concerns. However, the social equity pivot toward the proposed paid-only standard also supports an important objective common to most governmental agencies. Internships feed the pipeline for entry level professional jobs by attracting students to public service careers. It would be a disservice to public service aspirants to teach public service values, particularly social equity, and not align practice accordingly.

Long-term allegiance to social equity is more important than free help and budget machinations that refuse intern pay. How do governments dodge the public service values (e.g., social equity) embedded in their democratic mission? Rather than right-sizing budgets, governmental agencies would be wrong-sizing their democratic character by betraying social equity. Social equity demands equitable treatment and fundamental fairness rather than governmental claims of unaffordability. Using unpaid interns is not a financial necessity.

After all, public services may be scaled to remain within revenues while reflecting social equity as a public service value in planning for paid-only internships. As a last resort, agencies can forgo employing an intern rather than besmirching a rudimentary value of governance.

There is a need to reconceptualize internships facilitated by the NASPAA accredited domestic programs to conform to the professed social equity value. Socioeconomic variances effectively deny some the same equitable access while others bear disparate outcomes in contrast to those with paid internships. These inequities may occur despite an applicant's reasonably comparable, or exceptional, qualifications compared to others. Unpaid internships place poorer students at a competitive disadvantage (Perlin, 2012; Yamada, 2002; 2016).

Paid-only Standard Yields More Good than Harm

A paid-only governmental internship standard rectifies the current inequitable paradigm consisting of two-classes of interns, one paid and the other unpaid. Under the paid-only standard, potential interns are selected solely on job relevant qualifications, a cherished hallmark of human resources management. This eliminates socioeconomic status as an internship factor. In turn, the barriers to access and outcomes evaporate. Qualified potential interns compete fairly with an equitable opportunity to share similar job-outcomes while acquiring requisite service-learning benefits. The prospects for early job-outcomes dramatically improve with pay (NACE, 2018a; 2019).

Paying interns results in systemic positive changes while expunging the social equity conundrum of unpaid internships (Burke & Carton, 2013). Concurrently, compensation enhances the profile of governmental agencies in the job market as students consider career paths. A paid-only internship policy provides a range of benefits including the following:

- Stimulating student interest while increasing the qualified applicant pool (ICMA, 2021; Perlin, 2012);
- Modeling more meaningful employee treatment by governmental agencies as students transition to the responsibilities of a real job (ICMA, 2021);
- Focusing students on serious work results (Perlin, 2012);
- Replacing income forgone from other employment in addition to mollifying helpful parents bearing some educational costs (Berger, 1992);
- Supporting social mobility for the socioeconomically disadvantaged (Curiale, 2010) while increasing opportunities for a more representative governmental bureaucracy (Llorens, 2012; Rivera, 2016).

Institutionalizing Paid – Only Governmental Internships

Improving social equity among governmental interns beckons innovation (Tarlton et al., 2020). The NASPAA could lead institutionalizing paid-only U.S. governmental internships. A multipronged strategy could include:

- modifying accreditation standards,
- advocating federal reform, and
- pushing for associated national data tracking.

The following three sub-sections can reinforce and advance social equity in dealing with governmental internships.

Accreditation Modifications

The NASPAA, consistent with its stated public service values, has a catalytic role in addressing social equity concerns in unpaid internships (Johnson & Svava, 2015b). Its influential reach through public service values, including social equity, is readily demonstrable. For example, Svava and Baizhanov (2019) find that of 125 NASPAA self-study reports (designed, in part, to document program promotion of public service values) identify 38 consolidated public service value categories. The frequency of each category's inclusion in these reports ranges from a high of 66% to a low of 5%. The category of "equity/reduce disparities/social justice," considered a proxy for social equity, is listed in 53% of the self-study reports and ranks third among the most frequently mentioned values. Consequently, corrective action through modification of accreditation standards is an obvious step. Normatively, this should include alignment of the NASPAA's espoused values with revised accreditation standards that foster paid-only internships. This would neutralize socioeconomic exclusion while preserving social equity among those seeking internships.

Modification of the NASPAA's accreditation standards 4.3 and 4.4 are recommended to remove the social equity access and outcomes barriers arising in unpaid governmental internships. First, Standard 4 governs "Matching Operations with the Mission: Serving Students" (NASPAA, 2019). Under 4.3 "Support for Students," accredited programs are responsible for "internship placement and supervision" (p. 7). This provision could be amended as indicated by the following italics:

4.3 Support for Students: The program will ensure the availability of support services, such as curriculum advising, *paid-only* internship placement and supervision, career counseling, and job placement assistance to enable students to progress in careers in public service.

Second, under 4.4 "Student Diversity," the NASPAA now mandates promotion of "diversity and a climate of inclusiveness through its recruitment, admissions practices, retention efforts, and student support services" (2019, p. 7). This provision could be amended as indicated by the following italics:

4.4 Student Diversity: The program will promote diversity and a climate of inclusiveness through its recruitment, admissions practices, retention efforts, and student support services, *including socioeconomic social equity*.

These amendments, underscoring the NASPAA's expectations for paid-only governmental internships, extinguish the dissonance between the public service value of social equity and the actual internship practice. They remove the entrenched disconnect embedded in accredited programs that facilitate unpaid internship placements. With these amended standards, the NASPAA can address requirements for ongoing self-study. For instance, self-study documents can be required (1) to detail compliance with the modified standards, or (2) to disclose planned transition compliance.

As accredited programs comply, they should reach out to their clientele governmental agencies to inform them of the NASPAA changes. As Johnson and Svava reinforce, universities have a responsibility “to educate public administrators in fair and equitable personnel practices and to make them aware of the hidden pitfalls that may obstruct progress and the opportunities that may not be obvious to promote inclusion” (2015b, p. 275). Once informed, accredited programs should decline to post unpaid governmental internship flyers and cease facilitating student placements for them.

Federal Reform

Two distinct routes exist to bring paid-only uniformity among governmental interns. First, Congress can amend the FLSA (1938) to distinguish *volunteer* status (29 U.S.C. § 203e(4)(A)) from employee status as a governmental intern, where learning for future careers motivates service rather than charitable civic work. This appears to be the most definitive method to implement the proposed paid-only internship transformation. Congress’s legislative willingness to mandate payment of its own interns from the 2019 budget demonstrates the current salience of social equity for at least some internships (Johnson & Baker, 2019).

Second, the Department of Labor, under the Administrative Procedures Act (1946), can amend the Code of Federal Regulations (CFR). This could be done by changing the CFR, Application of the FLSA, “Volunteers” defined, 29 CFR § 553.101 (1987) and 29 CFR § 553.104(b) (1987) through inserting language to differentiate governmental interns as paid employees preparing for public service professional careers. This avoids lumping governmental interns with those volunteering for other civic, charitable or humanitarian reasons. Department of Labor regulatory changes could follow.

The NASPAA can mobilize a supporting reform coalition. Social equity resonates with several prospective partners representing the foremost public service and human resources organizations. For example, institutionalizing a paid-only standard is consistent with the social equity sensitivity in the American Society for Public Administration’s Code of Ethics (2020). The ICMA Code of Ethics (2020) instructs members to serve people with fairness and impartiality. The International Public Management Association for Human Resources (2018) encourages inclusiveness as a critical value, including socioeconomic status. The Society for Human Resources Management’s Code of Ethics (2014) promotes fairness and justice as well as inclusivity. Additionally, the National Society for Experiential Education, a nonprofit association of educators, businesses, and community leaders, endorses pay for all internships. It normatively argues that college credit should be for what interns learn. Compensation should be for what they supply to the internship sponsor. “The two are neither mutually exclusive nor conflicting” (National Society for Experiential Education, 2021, p. 1).

National Data Tracking of Governmental Internships

The Department of Labor’s Bureau of Labor Statistics (2020) compiles impartial factual information regarding federal labor economics. It collects, analyses, and communicates data regarding economic issues to Congress, federal agencies, subordinate governments, and the public. The NASPAA and its coalition partners could request the Bureau to collect and to report data on all governmental internships and their pay status. This effort would aim to inform legislative policy and to standardize intern pay status going forward. A complementary purpose would be creation of a more robust, public administration relevant, data base from which to research and to inform service-learning internships facilitated by the

NASPAA domestic accredited programs.

The recommended national tracking could advance new frontiers of research for public administration students. First, does a paid-only governmental internship policy for public administration students lead to a more representative and inclusive workforce (beyond merely increasing workforce socioeconomic diversity)? Second, what are the appropriate relationships between mandated national and state minimum wages compared to the pay rate for paid-only governmental interns? Third, since several of the NASPAA accredited programs include nonprofit specialties, do nonprofit unpaid interns experience similar social equity issues? Fourth, and finally, what are the international implications of changes to U.S. NASPAA accredited programs?

Discussion and Conclusion

Social equity is salient as a public service value undergirding public administration and the NASPAA's accredited programs. This article considers the dimensions of social equity in relationship to unpaid governmental internships. It incorporates reviewing the benefits of internships as a service-learning pedagogy. The U.S. legal paradigm in which governmental internships nest identifies two classes of internships, paid and unpaid. The social equity impacts for unpaid interns indicate that the socioeconomically disadvantaged suffer an access barrier. Nevertheless, some forego pay and work as unpaid interns anyway, then experience a barrier in one or more outcomes. They do not share similar job-outcomes as those functioning in paid internships. These consequences reveal striking and deep-seated inconsistencies with the social equity that the NASPAA says it values.

The disturbing contradiction between promoting social equity and actual practice (i.e., disregarding the social inequities arising from unpaid governmental internships) lies at the doorsteps of the NASPAA's domestic accredited programs. It undercuts the professed stalwart adherence to social equity. Widespread acquiescence to unpaid internships abounds while inequitably giving students of more affluence a competitive edge. Unpaid internships mindlessly continue social equity barriers, not "narrowing and eliminating disparities" as urged by Johnson and Svara (2015b, p. 266). This trend means the socioeconomically disadvantaged are likely underrepresented as a group in serving in governmental internships. It is reasonable to infer that such underrepresentation impedes the rate at which governmental agencies achieve greater socioeconomic diversity in a more representative bureaucracy. Moreover, the unfairness to qualified internship applicants who are socioeconomically disadvantaged may affect whether they perceive governmental agencies as desirable prospective employers.

Among the NASPAA's public service values, social equity shines like a beacon of hope in governmental agencies. Public administration has a long history of promoting social equity while preventing and reducing unfairness and injustices amid diversity (Johnson & Svara, 2015a). That includes getting down into the weeds of governmental internships, as this article does, to analyze their congruence with social equity and recommending remediating actions where appropriate.

Innovative leadership from the NASPAA is required to preserve social equity as a public service value. It can jump-start a systemic shift by enacting accreditation changes to function as a catalyst for domestic accredited programs in realigning the thrust of unpaid governmental internships. The NASPAA can champion federal reform to end the social equity barriers facing career-minded students motivated to pursue public service. Additionally, it can urge the Department of Labor to collect governmental internship data

nationally. With critical data available, the NASPAA can encourage service-learning pedagogical research while fine tuning its leadership regarding internship practice.

Successful execution of these strategies will lay to rest the current social equity unpaid internship dilemma. This proposed pivot could precipitate a tipping point for change in non-accredited programs, nonprofits, and other organizations concerning unpaid internships. Corrective actions by the NASPAA would model social equity leadership by resolving a troublesome inequity within its purview. At the same time, it reinforces the NASPAA as the public service educational standard, both *in word and in deed*.

Author's Biographies

David L. Baker, Ph.D., is Emeritus Professor of Public Administration, California State University, San Bernardino. He has 30 years of public agency management experience including 12 years as the chief executive in two California counties. His research interests are public management, public budgeting and finance, organizational behavior, and the scholarship of teaching.

Ann Marie Johnson is Associate Professor of Management, California State University, San Bernardino. She received her JD/MA from the University of Cincinnati and Ph.D. at the University at Albany. She worked at the Michigan Court of Appeals and U.S. Dept. of Housing and Urban Development in Washington, D.C. Her research interests include law, social equity, regulation and human resources.

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