

Career Services, Externships, and Clinical Placements

Background

During the recertification process for Title IV aid eligibility, the Department of Education (ED) will review information on the number and distributions of career services staff on campus, services promised to students based on campus communications, and partnerships with recruiters and employers. This series of new regulations also requires that institutions provide information on clinical placements and externships required for certain occupations, ensuring access for all students that would require them. All of this information will be reported as part of the Title IV recertification process.

What will be “in effect” as of July 1, 2024?

As of July 1, 2024, institutions going through Title IV recertification should expect to report additional information related to career services, externships, and clinical placements. This includes the number of staff, distribution of staff, services promised to students, as well as partnerships with employers and recruiters. ED has not communicated specific staffing ratios or ideal metrics for this topic. Instead, ED noted that they would request additional information if the original submission did not seem to align with what would be expected or if what was promised to students was deemed out of line with the number of staff dedicated to career services.

For externship and clinical placement, ED noted that it is concerned that students are enrolled in programs that do not have sufficient placements available when an externship or clinical rotation is required for the student to obtain employment in their given field. The rule specifically states that externships and clinical placements must be provided within 45 days of a student successfully completing required coursework in a geographically accessible area. This complicates distance education programs as the institution must secure the placement opportunity, even at a distance.


What should our institution do to prepare?

Each institution will need to demonstrate compliance to ED and thus should have a mechanism for easily updating and sharing information on employee counts, lists of partnerships and employers, along with service utilization rates. Compile information internally on staffing, communications to students, service utilization among students, placement rates for internships and hiring, lists of partnerships with businesses and recruiters, and employment information on recent alumni (to the greatest extent possible). ED’s goal is to match what is promised to students with what is actually experienced by students.

For externships and clinical rotations, institutions should provide data on the number of students enrolled both on campus and via distance education in programs that require an externship or clinical rotation. This data should be provided along with placement information and locations. For students enrolled via distance education who have not yet completed the coursework for an externship or clinical rotation, institutions should indicate their preparedness for these students to obtain placements upon course completion. If your institution is unable to secure relevant externships and clinical rotations for students either locally or for those via distance education, then enrollment should reflect your institution’s capacity to serve students as the new rule requires: either reducing enrollment locally, eliminating enrollment for certain distance students, or both.

Potential repercussions for non-compliance

This information is part of a broader package of data that ED requires for Title IV recertification. While we do not know the ideal ratios or service levels for career services, we know that externships and clinical placement



requirements are clear. ED has indicated that an institution may need to provide further documentation on career services or have provisional certification for Title IV while coming into compliance.

Q&A

Q1. What happens if a company closes or cuts off externships mid-year?

A1. This would likely need to be reported during the next recertification process but this particular issue was not addressed.

Q2. Do you have to show the ability to do placements when starting a new program – even if the clinical or externships aren't required until further in the student's career?

A1. This specific instance was not addressed in the final rule, just that sufficient placements must be available at a reasonable distance for all students enrolled in programs that require them.