



Child Life Clinical Internship SBAR: Title IV Federal Registry

Situation:

Title IV refers to the financial aid programs for postsecondary students authorized under Title IV of the Higher Education Act of 1965. This legislation extended students the opportunity to attend college who would not otherwise have had the chance. The amendment (Federal Register) was adopted July 1st of 2023 to reflect the post-pandemic challenges for students securing the clinical internships needed to achieve certification or licensure and enter the workforce. Concerned about the misuse and overuse of federal student aid dollars, and the perceived lack of university accountability for students enrolled in their programs, the register was designed to ensure student access to clinical training programs required for job entry. Under these revisions, academic institutions must now bear the responsibility of ensuring students are enrolled in and able to complete timely, accessible, and local internship experiences in fields of study that require them for job entry.

With this amendment to the Federal Register mandating fundamental changes to the current process of child life internship competition, we can anticipate pivotal changes to the current process will be necessary. Child life academic programs and clinical institutions are affected by way of clinical internship being a central requirement for child life certification eligibility. Academic programs are at risk of elimination if they cannot comply with these standards. Fewer academic programs, the increased stakes of internship acquisition, and slowed production of certification eligible professionals will have widespread effects on the child life profession.

Background:

According to the new Federal Register:

“Academic institutions must provide students with geographically accessible clinical or externship opportunities related to and required for completion of the credential or licensure in a recognized occupation, within 45 days of the completion of other required coursework” (p. 74570).

This statute means that at the penalty of losing the institution’s federal funding, academic programs are required to ensure students have local and immediate access to child life internship placements once they have completed their coursework for certification. More specifically, this is expected to be: 1) coordinated/managed/achieved by the academic site, 2) guaranteed for all students in the site’s child life academic program, 3) “geographically accessible” to all students, and 4) meet the 45-day stipulation. Other professions such as Nutrition and Dietetics were able to



anticipate this legislation and have moved significantly and swiftly to meet these expectations. In discussions with ACLP and CLCC, it was determined that CLAS is the most appropriate organization to address the current situation.

Presently, child life students are living in and learning from academic and clinical institutions all over the country. The Federal Register mandates internships be provided in a geographically accessible location for the student, not necessarily near the college/university. However, as child life falls into the category of “Highly Specialized” professions, travel to internship sites across the country may be permitted in some interpretations without violation of this rule. Similarly, the Federal Register mandates that students be offered an internship within 45 days of establishing readiness (completion of coursework), with some interpreting the internship itself can begin later if secured within 120 days of offer acceptance.

Assessment:

The Child Life Academic Society has collected information and insights from their membership, which currently represents 24 out of a known 30 child life academic programs in the United States. Across these reports, various interpretations of risk level and associated recommendations have been received from members’ corresponding legal counsels. While CLAS is not directly accountable to these institution-level laws, the organization is working to support members whose academic child life programs are legally responsible and urgently affected.

Out of an abundance of concern and foremost commitment to best academic practices, CLAS is focused on addressing the most risk averse perspectives to support the viability of the child life profession. CLAS has assessed the worst-case scenario to be programs’ inability to comply with Title IV/Federal Register 668.16 laws regarding clinical internships and the possible consequence of academic program termination.

This possibility has significant implications for not only academic child life programs, but for child life students, child life clinical internships, child life clinical programs, and the child life profession.

Specific impacts on the child life profession’s supply and demand include:

- A potential reduction in the number of child life academic programs, which
 - reduces the number of students applying for child life internships,
 - reduces the number of child life students graduating,
 - reduces the number of Child Life Certification eligible professionals, and
 - reduces the number of child life professionals to fill clinical child life positions, thereby exacerbating the current staffing crisis.

Current Considerations:



- How can child life academics and child life clinical coordinators collaborate to address clinical internship challenges for all stakeholders?
- How can child life academic professionals assist in reducing the administrative and practical costs associated with screening internship applications?
- How could child life transition from the current competitive application process to an efficient and effective alternative model?

Recommendation:

Currently, there is no formal process for collecting child life clinical internship data. It is imperative to gather this data from involved stakeholders to fully understand the breadth and context of child life internships.

To this end, CLAS can absorb this responsibility and is willing to host a series of registries that can inform decision making for all involved. Three registries will be created: 1) The Child Life Clinical Internship Registry, 2) The Child Life Academic Program Registry, and 3) The Students enrolled in a Child Life Academic Program (as defined by CLAS Standards). These registries are designed to collect data and present the current state of child life internships in real time. This data is designed to be informative for all stakeholders. They will be used and shared to answer the following questions for the child life community:

1. How many child life internship positions are available, and in what regions/areas, each internship round?
2. How many high quality, competency ready child life students from child life academic programs are applying for internships each round?
3. How does the ratio of students to positions distribute across regions/areas?

The perspectives gathered from responses to these questions will yield critical insights for evaluating the ability for child life academic programs – and as it follows, child life clinical internship sites – to comply with the stipulations set forth by Federal Register 668.16.

Goals of Proposed Child Life Clinical Internship Registries:

1. Collect data on the number of child life clinical internship positions available each round.
2. Collect data on the number of child life students in child life academic programs applying each round.
 - Internship applicants in child life academic programs are students being taught the child life competencies by CCLS faculty.
3. Collect data to assess the location of students compared with the locations of child life clinical internship positions.
 - location of students and universities compared to location of clinical internship sites to assess reasonable distance requirement



Data to be collected from each stakeholder:

- Child Life Clinical Internship Sites – healthcare-based internship programs with CCLS clinical preceptors
 - Hospital name and location address
 - Number of internship positions offered each round
 - Number of internship candidates the program was willing to make offers to each round
 - Number of candidates offers were made to each round
 - Number of internship positions filled each round
 - Does the clinical internship program pay students or provide a financial benefit?
 - Does the clinical internship program require affiliation agreements?
 - Does the clinical internship program have exclusive affiliations with specific universities?
- Child Life Academic Programs - meet CLAS definition: The program offers a formally documented child life specific program listed in the university/college catalog that provides either a child life degree, child life concentration, or child life option/track, AND employs a full-time Certified Child Life Specialist faculty member.
 - University program name and address
 - Degrees offered: graduate or undergraduate
 - Online or on-campus program
 - Number of eligible students applying for internships each round
- Child Life Clinical Internship Students - Child Life Academic Program Director would provide a link to the student registry to currently enrolled students applying for internship each round.
 - Name and current living address
 - University program affiliation and university address
 - Number of internships applying to

CLAS via the child life academic faculty will keep track of students who receive internships and those who do not. CLAS keeps the list and shares with clinical internship sites with available positions and tracks 1st round and 2nd round offers, etc.

Some Frequently Asked Questions

How will another listing of child life internship programs and academic programs help to solve current issues in the child life internship process?

The child life internship program registry is NOT an online listing of internship programs that will be publicly available to students and other vested parties. Instead, it is a systematically conducted census of sorts - a data collection to help the child life community add a piece of information to the puzzle for ongoing decision making. We will share this information with the



child life community in an aggregate way (such as the total number of programs reporting and the total number of available positions reported). Simultaneously the registry project will be collecting similar census-type data from child life academic programs to better understand the numbers and locations of students who are looking for child life internships.

How does the federal register apply when students have already graduated when pursuing internship, take a leave of absence before internship, or are completing programs in which the internship is not a requirement for graduation?

The federal register arose out of concern for these very populations. Though child life is small compared to other disciplines training students for certification or licensure (such as teaching, nursing, etc.), the amount of federal dollars being used to support students “in the in between” while searching for clinical placements was a significant concern. This was of concern not only on a national level as a potential misuse of federal funds, but also on the individual level as students took out large amounts of loans that would be challenging to ever repay on professional salaries with high interest rates. The most risk averse interpretation we have heard from our members is that to offer an alternate internship placement, to encourage students to complete internship after graduation, or to allow additional coursework or a leave of absence while a student applies for an additional internship cycle is NOT in compliance with the federal register - and may actually put an institution at additional risk of being audited for compliance.

How will the federal register impact students who are not enrolled in child life academic programs, who are completing classes from different institutions to meet certification requirements?

The Child Life Academic Society defines a child life academic program as one that 1) offers a formally documented child life degree, concentration, or child life option/track as listed in the university/college catalogue, AND 2) employs a full-time Certified Child Life Specialist faculty member. In conducting a thorough benchmarking analysis of other medical and allied health professions, child life was found to be the only one that does not currently require, at minimum, a degree in the specified field (child life). More information about the findings of this study can be found [here](#). Some of our core values are inclusivity and accessibility, and equity and justice - and the current child life internship system does not appear to be producing a truly diverse and accessible learning opportunity for aspiring child life professionals. Along with the intent of the federal register, we recognize the value in strengthening child life academic requirements as a means of ensuring equity in the child life internship process, thus contributing to true diversity in the child life profession.



How might a matching system change or address the issues we currently face on both clinical and academic sides of the internship coin?

It is true that matching systems are used by many medical and allied health disciplines to coordinate student placements between academic and clinical sites - and there is evidence that these programs are associated with some positive outcomes for applicants and sites. However, there is currently not enough information to know if an internship matching system is what the child life profession needs currently. With no precise count of the amount of internship positions being offered or the number of students seeking internship placements, it is impossible to gauge if a matching system is a) needed, b) possible, and c) the best possible choice available. The CLAS clinical and academic registries will provide the crucial census-like information needed to begin answering these questions and taking needed actions.

When and how can we expect registry data collection to roll out?

In March, a representative from each clinical site (either the program leader or internship coordinator, depending on whose info we have on file), will receive an email invitation and survey link to participate in the registry. The registry will ask 8 questions about your site's applicants and outcomes for the Winter/Spring 2025 internship cycle (your current interns). These questions in total should take no more than 5 minutes to complete. After this initial data collection, CLAS will produce a public report on the current state of child life internship positions, with plans to continue this data collection and update the report after completion of each internship application cycle for one year (three total surveys). This data will also be collected in a parallel format from child life academic programs with respect to the numbers of students applying for child life internships each cycle. To change or update your program's listed contact for the purposes of the registry survey, you can email childlifeacademicsociety@gmail.com