

Practicum Education Manual

2024-2025

ATTENTION: The Suzanne Dworak-Peck School of Social Work adheres to the School's and the University's policies and protocols. All MSW students are expected to review, understand, and comply with the policies and protocols included in the [USC Student Handbook](#), [USC Policies and Policy Governance](#), [USC Integrity and Accountability Code](#), [USC Suzanne Dworak-Peck School of Social Work MSW Policies and Procedures](#), and [Practicum Education Manual](#).



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I. WELCOME

As the Director of Social Work Practicum Education, I welcome MSW students and Practicum Instructors who are engaged in the interactive process of learning and teaching about the practice of professional social work in the real world. Practicum Education is committed to providing opportunities for our students to develop skills in the most current practices, particularly in evidence-based interventions, and to receive supervision by the finest Practicum Instructors in the country.

This Practicum Education Manual is designed to provide general information and guidance about Practicum Education to MSW students and Practicum Instructors at our Academic Centers (AC) - the On-Campus Program (OCP), Virtual Academic Center (VAC), and San Diego Academic Center (SDAC).

Practicum Education is the “Heart of Social Work”, and we want to provide an experience for students that represents the reality of professional social work practitioners and agencies today. The experiences in practicum can evoke a range of reactions and like the challenges in our communities, the process of learning in practicum is dynamic and complex. You may confront difficult situations and dilemmas in the first few months. With open communication and good collaborative problem solving, the learning during the academic year will be profound and life changing.

Individual and specific questions are encouraged and can be directed to the Practicum Faculty who are assigned to each student at their respective Academic Center. If there continues to be a concern, then the Practicum Faculty can contact the Assistant Directors of Practicum Education for further discussion. The roles of the Director, the Assistant Director, and the Practicum Faculty are to provide our students with as much support as possible in the process of integrating theory with practice.

I extend my gratitude and best regards to MSW students and Practicum Instructors for beginning a lifelong journey of learning, self-discovery, and transformation as we continue to build our future workforce in our profession.



Suh Chen Hsiao, DPPD, MSW, MA, PPSC, LCSW
Director of Social Work Practicum Education
Professor of Social Work Practicum Education

II. PRACTICUM EDUCATION

Practicum Education is an independent and integral sequence of the MSW curriculum. Students are exposed to selected and organized opportunities guided by the [2022 Educational Policy and Accreditation Standards \(EPAS\)](#). Practicum is the signature pedagogy of Social Work Education. Practicum Education seeks to validate, apply, and integrate the knowledge, theories, and concepts of social work practice learned throughout the curriculum. Practicum agencies are expected to provide "in vivo" experiences relevant to the academic content. The student is expected to apply academic knowledge, social work skills, critical thinking, professional behavior, ethics, and values learned in the classroom to direct practice work.




For effective integrative learning between community-based sites and the classroom, the School and the agency collaborate closely. USC administrators, staff, and Practicum Faculty partner with agency Practicum Instructors to foster comprehensive and high-quality social work education and training. The collaboration teaches and guides students to practice with cultural humility and to abide by professional social work behavior, values, and the [NASW Code of Ethics](#). This culturally responsive approach helps prepare students to practice social work with diverse populations and to take on leadership roles within the profession.

A. Objectives of Practicum Education

Practicum Education prepares students to enter the social work profession by meeting the following objectives:

- Integrate academic learning with all levels of practicum work (micro, mezzo, macro).
- Increase proficiency in the required core competencies for social work education as it relates to practicum work. [The 2022 CSWE Nine Social Work Competencies](#) are:
 1. Demonstrate Ethical and Professional Behavior
 2. Advance Human Rights and Social, Racial, Economic, and Environmental Justice
 3. Engage in Anti-Racism, Diversity, Equity, and Inclusion (ADEI) in Practice
 4. Engage in Practice-Informed Research and Research-informed Practice
 5. Engage in Policy Practice
 6. Engage with Individuals, Families, Groups, Organizations, and Communities
 7. Assess Individuals, Families, Groups, Organizations, and Communities
 8. Intervene with Individuals, Families, Groups, Organizations, and Communities
 9. Evaluate Practice with Individuals, Families, Groups, Organizations, and Communities
- Develop the ability to understand and utilize a broad range of modalities and interventions in micro, mezzo, and macro practice with diverse populations.
- Focus on building the knowledge for generalist practice in the 1st and 2nd semesters (Integrative Social Work MSW Program) to establish a broad foundation for direct practice work.
- Develop a deeper knowledge and depth of skills needed for advanced professional practice in the Integrative Social Work (ISW MSW) Program with optional tracks in the 3rd and 4th semesters.

B. Campus Locations and Contact Information for Practicum Related Queries

University Park Campus (OCP)	
	<p>Montgomery Ross Fisher Building 669 W. 34th Street Los Angeles, CA 90089-0411 213.740.2711</p>
	<p>For general practicum inquiries contact: OCP Practicum sswpracticum@usc.edu</p>
	<p>For OCP InPlace related enquiries (learning agreements, end of semester evaluations and access to InPlace) contact: ocpevaluation@usc.edu</p>
Virtual Academic Center (VAC)	
	<p>For general practicum enquiries contact: VAC Practicum vacpracticum@usc.edu</p>
	<p>For VAC InPlace related enquiries (learning agreements, end of semester evaluations and access to InPlace) contact: vacpracticumevaluation@usc.edu</p>
San Diego Academic Center (SDAC)	
	<p>sswpracticum@usc.edu 213-740-2013 9860 Mesa Rim Road, San Diego, CA 92121</p>

C. Practicum Office

Faculty, Staff and Programs Information
<p>For information on Adjunct or Part Time Practicum Faculty please contact sswpracticum@usc.edu.</p>
<p>Refer to the USC Suzanne Dworak-Peck School of Social Work Faculty Directory for a list of all faculty.</p>
<p>Refer to the Community and Clinical Programs for details of the Telebehavioral Health Clinic, Trauma Recovery Center, Trojan Guardian Scholars Program, and SDP-Keck Human Rights Clinic.</p>

D. Practicum Agency Sites

The Practicum, also known as a student’s placement or internship, takes place in [USC Memorandum of Agreement \(MOA\)](#) contract approved agencies located throughout the country that represent a wide range of social work services and practice. These agencies are approved sites based on the quality of the professional practice, commitment to addressing social problems and an interest to participate in the professional education of MSW students. The agency is responsible for providing the learning opportunities representative of social work practice within the student’s region and/or community. They must subscribe to the USC Suzanne Dworak-Peck School of Social Work educational objectives, the [2022 CSWE EPAS and The Nine Core Competencies](#).

Note: MSW Students are not allowed to secure their own placement site but may suggest potential sites for the placement coordinators to review.

Internship sites must treat the students as learners while providing the resources necessary to meet their learning objectives. Unless officially approved by the USC Suzanne Dworak-Peck School of Social Work Practicum Faculty and Administration, students may not work at home during the placement hours without the express consent of the Practicum Instructor and assigned Practicum Faculty. Without prior approval, any hours/tasks completed remotely will not be counted as meeting the number of hours required for a passing grade.

Note: Students cannot sign any agency “contracts” nor enter any agreements that refute or negate the provisions in the official agency/organization MOA with the USC Suzanne Dworak-Peck School of Social Work. This includes important policies regarding placement hours and educational calendar events such as finals week.

A placement agency site may decide to broaden the student’s experience by rotating to different departments and/or make arrangements with contracted partners of the agency to expand learning opportunities. In any of these options, the primary agency site carries the main responsibility for practicum instruction while the secondary site provides a Preceptor for supplemental supervision. All options must be pre-approved by the USC Suzanne Dworak-Peck School of Social Work Practicum Faculty and Administration prior to the start of the internship, or the hours will not be counted toward the number required for a passing grade.

The USC Suzanne Dworak-Peck School of Social Work welcomes agencies interested in partnering as Practicum placement sites. To qualify as a placement site, an agency must meet the following criteria:

- Provide a sufficient amount and variety of assignments to develop student knowledge and practice skills.
- Provide an opportunity to work with individuals, families, groups, communities, and/or organizations unless otherwise indicated by an appropriate faculty placement team member.
- Provide ample scheduled time for weekly practicum instruction to permit both individual and group conferences with students.
- Provide adequate resources for the student intern to complete assigned tasks such as office space, office supplies, telephone availability, and clerical support.
- Provide opportunities for in-service training and access to agency consultants.
- Have an interest in participating in the student’s research.
- Have an interest in aligning the agency’s practice framework to theories taught in the classroom.

New practicum agency sites must complete the [New Agency Information Packet](#) and a [Memorandum of Agreement](#) approved by the USC Legal Counsel. An agency representative must also meet with a USC Practicum Faculty to evaluate the appropriateness of the site and for approval. This process typically takes three to six months to complete.

E. Practicum Education Requirements

Applied Learning in Practicum Education courses, which include the student’s internship experience and an in-class seminar, are required. The table below provides the sequential overview of the courses for each semester.

Note: Continuing Students should refer to the Practicum Education Manual for the year of their enrollment. Please contact the Practicum Office to obtain the specific year’s manual: sswpracticum@usc.edu.

Practicum Internship [with the Integrative Social Work MSW Program Course Work](#)

Semester Course Information

Practicum Education Courses (12 units total):			
Semester 1	Semester 2	Semester 3	Semester 4
<ul style="list-style-type: none"> Applied Learning In Practicum Education I (591) – 3 Units 	<ul style="list-style-type: none"> Applied Learning in Practicum Education II (593) – 3 Units 	<ul style="list-style-type: none"> Advanced Applied Learning in Practicum Education III (691) – 3 Units 	<ul style="list-style-type: none"> Advanced Applied Learning in Practicum IV (693) – 3 Units

All MSW students must complete all four semesters of Applied Learning in Practicum Education Courses: 591, 593, 691, 693. All four courses must be completed sequentially as part of the graduation requirements.

Students must complete a minimum of **1200 practicum hours** to earn their MSW degree.

All practicum internship hours must be completed by interning at an approved agency site for a minimum of 1100 practicum hours assigned through the formal placement process. Of the 1200 practicum hours, a minimum of 100 hours must be earned by attending the classroom portion of the Applied Learning in Practicum Education courses.

The first and second semesters of generalist first year (591 and 593) require the completion of a minimum of 450 practicum hours; the third and fourth semesters of advanced second-year (691 and 693) require the completion of a minimum of 650 practicum hours. Any practicum hours earned in the generalist first-year internship do not apply to the advanced second-year internship. During 691 and 693, in general, students are required to complete a minimum of 24 hours of internship a week at the assigned practicum site (excluding university holidays). Students must complete a minimum of 650 practicum hours by the end of their 693 Semester. Students may not end an internship early, even if they have met the 1100 minimum practicum hours.

Note: [Pupil Personnel Services Credential \(PPSC\)](#) students must earn a minimum of 600 hours at their assigned PPSC school based placement to meet the requirements of the California State Commission on Teacher Credentialing.

Note: Students who reside or intend to practice in a state outside of California may complete this certification, but they are not guaranteed licensure as a school social worker. Requirements may vary from state to state, therefore students enrolling in this certification

program should research the requirements in the state in which they reside or intend to practice.

F. Practicum Placement Expectations for All MSW Students

Learning opportunities must align with the MSW curriculum. Placement days vary depending on the student's class schedule. Placement days are determined through a discussion between the agency and the student, in consultation with the Practicum Placement team and/or Faculty Liaison.

All MSW students are required to be available for their practicum internship(s) 16 - 24 hours per week during regular business hours. Evening and weekend hours are very limited and non-existent in most communities. An MSW or an approved alternative supervisor must be available during the student's internship hours.

Note: Students may not work over 8 hours per day without prior USC faculty pre-approval nor can they work more than 32 hours per week. MSW students may not bank hours in order to end their internship early, nor can they credit hours from the first year to the second year of internship. Practicum Instructors and students must adhere to the start and end dates of internship as indicated in the Practicum Calendar that will be made available to students and Practicum Instructors at the start of each semester. Students should be aware of the following:

- Internship extensions: Some agencies may require students to intern during the USC semester breaks for continuity of care. Any extension must be indicated in the Learning Agreement and/or Logbook.
- Make-up for missing hours: Any scheduled make-up hours must be completed in consultation with and the approval of the Practicum Instructor and Practicum Liaison.

The agency, student, and the Practicum Liaison must have a discussion and pre-approve the schedule as early as possible. Any changes in internship requirements must be noted in the Learning Agreement. Any changes in internship requirements after the initial learning agreement is completed must be made in writing and approved by the Practicum Instructor and by the Practicum Faculty.

On-Campus Students (OCP) are typically in different agencies for their first and second year with an option to stay in the same agency if approved by the placement team. VAC students are assigned one community-based placement.

The internship is assigned to all OCP and VAC first-year students by the Placement Team.

Second year OCP students may participate in the matching process by interviewing with agencies of interest specific to the Advanced ISW curriculum and/or selected track. MSW students will interview with agencies chosen from a list of approved placement agency sites. Students are responsible for arranging their interviews and providing the required post-interview feedback in a timely manner to the designated Practicum Faculty.

A student's refusal to participate in the placement process and in the internship will delay academic progress and may be the cause of a student's inability to complete and graduate from the MSW program.

For all students, once the placement match is made, it is the student's responsibility to contact the Practicum Instructor/Agency Coordinator as soon as possible to complete any agency specific Human Resources requirements and/or agency orientation prior to the start of the internship. The School is not responsible for any delays caused by the student not making contact with or beginning internship at the confirmed placement agency.

The pre-placement on-boarding processing may take place prior to the start of the semester. Although practicum agency sites may schedule pre-placement processing prior to the start of the semester/internship, they cannot be made mandatory due to students' travel plans or permanent home addresses. Any pre-placement agency expectations must be agreed upon by the student and the appropriate Practicum Placement Team. If the student is unable to complete pre-placement requirements, the student, appropriate Practicum Placement team member, and agency personnel must determine how these students will be given an opportunity to make-up the pre-placement processing after the semester starts.

MSW students are not allowed to identify their own placement site but may suggest potential sites for pre-approval processing. This process takes 3-6 months to complete and does not guarantee the student will be placed at the suggested practicum agency site.

Note: VAC students seeking a school-based placement may require a modified schedule to ensure a positive educational experience. VAC students are not permitted to begin school-based placements during the Summer semester. For more information on school based placements and the Pupil Personnel Services Credential (PPSC) see the website: <https://dworakpeck.usc.edu/academics/master-of-social-work/tracks/school-and-educational-settings>

- The Placement Team may initiate a Student Performance Review Plan (SPIP) process as needed when MSW students are meeting challenges in securing a placement internship. Issues that merit this process include but are not limited to the following:
 - Students who engage in unprofessional behavior anytime during the placement matching process or violate any of the [NASW Code of Ethics](#)
 - Students who interview at and are denied placement at two agencies because of inappropriate behaviors or who refuse placement at an approved agency(ies)
 - Failing three interviews due to inappropriate student behavior is the equivalent of a placement termination (see Section V, D. *Student is Terminated or Dismissed from the Placement Agency or Organization*)
 - The SPIP protocol is in Section V, *Failure to Make Satisfactory Progress*
- The School is not responsible for any delays caused by placement challenges and/or student's lack of prompt attention to any placement related tasks and processes
- Placement challenges as described above may lead to a significant delay in starting an internship and in completing the MSW program

G. Evidenced-Based Intervention Training

All MSW candidates are required to complete a minimum of two Evidenced-Based Intervention trainings. Participation in these trainings counts toward Practicum hours. If a student needs to complete their Evidenced-Based Intervention trainings during internship hours, it is the student's responsibility to communicate with and inform their Practicum

Instructors about the assigned date of their respective training. Should the Practicum Instructor object to the student's absence, it is the student's responsibility to connect with the Practicum Faculty to discuss the missed training.

Students are offered workshops throughout the academic year and are highly encouraged to participate. Workshops and training are offered to supplement and support internships.

H. Dual Degree

The USC Suzanne Dworak-Peck School of Social Work conducts dual degree programs with several other schools within/affiliated with the University. Students enrolled in these programs must meet the basic requirements of both Schools in order to earn both degrees. The practicum placement(s) are administered primarily by the School of Social Work in collaboration with the dual degree School. The dual degree program is completed in consultation with the School of Social Work Academic Advisor. Please refer to the website for further information.

I. Fees and Expenses

The School recognizes that some students may have financial challenges, and thus every effort is made to identify placements that provide financial support. However, this cannot be guaranteed and students should be aware that additional fees and expenses associated with their internship experience may occur. Students should consult with the University Financial Aid office if financial assistance is needed.

Students are responsible for transportation to and from their placement site up to 30 miles in one direction from their place of residence. The School is not responsible for any transportation related costs the student might incur.

Malpractice Insurance: All students entering placement are required to participate in the USC Suzanne Dworak-Peck School of Social Work's malpractice insurance coverage. Each student pays a required malpractice insurance fee prior to placement in an agency (included as part of the commitment deposit). This plan covers students while they are enrolled in their first and second year of placement. Copies of the certificate can be obtained from the Practicum Education Office (sswpracticum@usc.edu).

Additional costs may be incurred by the student to meet the HR requirements of the agency for the first and/or second year of internship. These may include special training and security/health clearances as well as parking, mileage etc.

Students are not responsible for payment for the practicum supervision provided by the agency.

J. Evaluation/Grading for the ISW MSW Practicum Curriculum

Applied Learning in Practicum Education is a 3-unit course (591, 593, 691, 693). It is a Credit/No Credit class. The grading is based on meeting all the requirements identified in the syllabi for both classroom assignments and internship requirements: (1) completion of required hours for each semester, (2) timely completion of the learning agreement, (3) timely

completion of the required [Reflective Learning Tools](#), (4) achievement of the [CSWE Nine Core Social Work Competencies](#) as evidenced in a satisfactory end of semester evaluation, and (5) classroom assignments. If the student completes all the practicum hours but fails to achieve expected demonstration of the Competencies, the grade will be “No Credit.” All requirements must be met to pass the course and earn a “Credit” grade. Failure to meet any one of the requirements will result in a “No Credit” grade and students must repeat the entire course.

Note: Any grade of “In-Progress,” “Incomplete,” or “No-Credit” in any of the Practicum Education courses requires documentation such as an In Progress/Incomplete Form and/or a Student Performance Improvement Plan (SPIP).

A Learning Agreement is completed at the beginning of each new internship. Formal evaluations are also submitted at the end of each semester. Practicum Instructors, students, and Preceptors (if applicable) must collaborate when completing all required documents. Placements are monitored by the Practicum Faculty. Successful completion of the practicum internship requires meeting the requirements as described in the syllabus for each class.

K. Practicum Education Roles

Practicum Education is a collaborative effort to provide a real-life social work learning experience to students placed in a designated agency. The collaboration consists of multiple professionals with distinct roles. The roles within Practicum Education are as follows:

- **Associate Dean of Community and Clinical Programs:** Has oversight for Practicum Education and supervises the Director of Practicum Education.
- **Director of Practicum Education:** Responsible for the development and continuity of the programs and policies of Practicum Education. This individual has overarching authority over all Practicum Education activities and functions. The Director serves as the final arbiter for issues that cannot be resolved at the Assistant Director level.
- **Assistant Director of Practicum Education:** Responsible for the operational aspects of Practicum Education activities and are the initial arbiter of any issues pertaining to Practicum Education.
- **Director, Social Work in Schools/PPSC:** Responsible for the operational aspects of the social work in schools program and the initial arbiter of any issues pertaining to the program.
- **Practicum Faculty/Liaison:** A Practicum Faculty member who teaches the Applied Learning for Practicum Education classes and coordinates, monitors, evaluates, and documents the student’s practicum experience to ensure optimal learning and professional development. They also provide consultation, assistance and evaluation to the student/intern and Practicum Instructor.
- **MSW Student/Intern:** The designation of “intern” is often used to refer to the MSW student when placed in an agency and enrolled in Practicum Education and completing courses to earn a Master of Social Work degree.
- **Practicum Instructor (PI) or External Practicum Instructor (EPI):** A professional social worker and an agency representative assigned to provide weekly supervision and instruction to MSW interns at a placement site. The PI may work collaboratively with a preceptor or daily task supervisor in an agency, but they have the primary and overall responsibility for the student’s learning, evaluation, and linkage with the University. The EPI performs all of the tasks of a traditional practicum instructor but

is an MSW that is contracted to supervise the intern and is usually not on site on a daily basis.

- **Preceptor/Agency Task Supervisor:** An individual affiliated with the agency who shares responsibility for the student's learning. They may or may not be a social worker by training, however, they must work closely with the Practicum Instructor of record.

L. Practicum Calendar and Attendance

To the fullest extent possible, students are expected to observe the agency attendance and time schedule policies. Applied Learning in Practicum Education is a class and students must adhere to the Practicum Calendar, which identifies the beginning and ending dates of the internship as well as important Practicum Education activities and events.

The School schedules specific events that require **MANDATORY ATTENDANCE**. Students must receive prior approval from their Practicum Instructor to receive practicum hour credits. Students will be notified by the School of any scheduled mandatory events.

All [University Holidays](#) are sanctioned time off. If a University Holiday falls on one of the student's regularly scheduled days at the agency, students are not required to attend internships. If students observe the University Holiday, they do not earn credit for practicum hours that day. If agency holidays fall on the students' internship days, students will need to make up the missed hours after consulting with their Practicum Instructor, Preceptor and Practicum Liaison.

Students are allowed eight hours off each semester for religious holidays or illness which must be discussed in advance and arranged with the Practicum Instructor/Preceptor. This time counts in the practicum hours and the student does not have to make-up this time.

Students are responsible for tracking their time at placement and ensuring they meet the minimum hours required per semester. Make-up hours for time missed must be discussed with and approved by the Practicum Instructor/Preceptor.

Students should approach their work at the agency as they would a place of employment, discussing any changes in schedule or promptly informing the Practicum Instructor/Preceptor of illness or absence. One such discussion is the University policy which protects students from being in practicum during Study Week. This typically falls on the week after the last day of placement each semester. Note that client care and continuity of agency operations must be strongly considered.

Semester Breaks and Internship extensions: The school values self-care as a part of NASW Code of Ethics and the CSWE Core Competencies. However, students may be required to continue providing services at their placement site during the semester breaks for continuity of care. Practicum hours completed during the semester breaks should be limited and discussed and documented during the development of the Learning Agreement (or added in the semester summary). It is permissible for students to apply hours completed during semester breaks to their overall hours. This must be approved in advance with their Practicum Liaison and Practicum Instructor.

Record keeping of required practicum hours including time spent in placement, optional activities noted above, and make-up hours is the joint responsibility of the student and the Practicum Instructor. Students are required to maintain all records for practicum assignment electronically as instructed by the Practicum Faculty and their agency policies.

Class attendance is required for all Applied Learning in Practicum Education courses. Within Practicum Education, your attendance factors into your grade. You must attend all class sessions and complete all assignments in order to accrue your hours. Not attending class or completing class assignments is equivalent to not attending your agency placement.

If you are unable to attend class, you are responsible for communicating with your Professor to be provided the opportunity to make-up the class practicum hours. The specific make-up assignment will be at the faculty discretion. Students will receive credit for class time when classes are not scheduled due to the University's academic calendar.

M. Transportation

Students should not transport client(s) in their personal vehicle or company vehicle unless the agency has given the student proper authorization to do so as part of the essential duty of the social work professionals at the agency. If driving is an essential duty of the internship, it must be discussed during the pre-placement meeting to ensure the MSW student can meet the driving requirement(s). The agency is responsible to provide authorization and orientation for interns to transport clients as well as insurance coverage.

NOTE: The University is not responsible for managing any requirements for transportation or driving as part of the social work internship and does not maintain insurance for interns driving as part of the essential duties of the social work internship.

III. MSW STUDENT: INFORMATION & RESPONSIBILITIES

A. Introduction

The MSW student has the unique opportunity of acquiring knowledge and skills in the principles of the social work profession and [NASW Code of Ethics](#) in the classroom and in placement. Students are required to learn and simultaneously apply the knowledge at their internship. Practicum Education provides the student this opportunity and helps increase their competency as a future Social Work professional. This requires strong commitment, dedication, and active participation from the MSW student/candidate. The School of Social Work and the agency are both committed in guiding the student through this process.

- The Placement Team may initiate a Student Performance Review Plan (SPIP) process as needed when MSW students encounter challenges in securing a placement internship as determined by Practicum Faculty. Issues that merit this process include but are not limited to the following:
 - Students who engage in unprofessional behavior anytime during the placement matching process or violate any of the [NASW Code of Ethics](#).
 - Students who interview at and are denied placement at two agencies because of inappropriate behaviors or refuse placement at an approved agency(ies).
 - **Failing three interviews** due to inappropriate student behavior is the equivalent of a placement termination (see *Section IV. D. Students Terminated or Dismissed from the Placement Agency or Organization*).
 - The SPIP protocol will adhere to *Section IV* of this manual.
- The School is not responsible for any delays caused by placement challenges and/or student's lack of prompt attention to any placement related tasks and processes.
- These challenges may lead to a significant delay in starting an internship and in completing the MSW program.

a. Practicum Education and Employment (POE)

The Council on Social Work Education (CSWE) sets the minimum standards for placement with the student's POE. The School of Social Work has established protocols, procedures, and standards that must be met to ensure an appropriate student learning experience in this setting. These are outlined in the Place of Employment Application. Students must indicate their intention to pursue a POE based internship at the outset of the placement process to the appropriate Practicum Faculty to receive an application and have the request approved. Students interested in pursuing an MSW internship at their current place of employment must apply and be approved by Practicum Faculty prior to being permitted to use their place of employment as their internship. The application is available by request via sswpracticum@usc.edu.

Note that full-time incoming first-year MSW students must provide 90 days' notice in advance of the start of the semester to be permitted to request a place of employment internship. Students are not responsible for any payment associated with providing Practicum supervision.

a. Accepting Employment at Current Internship

USC supports and encourages agencies to provide stipend to students for the work they are doing to complete their internship hours. A stipend is not considered employment. Students may accept employment that is in addition to or different than their internship role while already

an MSW Intern at an agency/organization. Prior to accepting any employment offer while an MSW intern, the student is expected to inform their Practicum Faculty if the student is planning to use their new employment position as a part of their internship and must submit a POE application for approval. The student should return the completed application to their Practicum Faculty Liaison. The student will be notified of the outcome of the application.

Note: Any POE request or placement comes with inherent risks. Employment demands may negatively affect or delay the student's ability to complete the requirements of the MSW program. Students must also be aware that any employment related disciplinary actions and/or termination at any point in time at a current placement may also lead to termination of internship. Hours accrued at the time of termination may not count toward the required hours of the practicum.

B. Track Change Process

ISW MSW Track selection should be finalized one semester prior to the start of the community-based Placement Process. Students should be aware that any changes past the established timeframe may cause significant delays in completing the MSW program and could incur additional expense. Any request made after the timeframe must be approved by the designated Assistant Director of Practicum Education for final determination.

C. Student Tasks & Responsibilities:

MSW students are responsible for the following tasks to meet the course objectives for the Applied Learning in Practicum Education classes:

- Contact and meet with the Practicum Instructor as soon as you are notified of your placement for a pre-placement meeting, Human Resources processing, and/or agency orientation.
- Participate in the agency orientation at the start of internship. If no orientation information is provided, please inquire.
- Learn the different roles, tasks, responsibilities, and scope of practice of the agency.
- Be open to feedback and support.
- Meet with your Practicum Instructor for mandatory weekly supervision. Failure to comply with this requirement may result in no credit grade in this course.
- Discuss internship issues in the Practicum Education classes for added feedback and support.
- Maintain a diverse caseload.
- Seek meaningful opportunities to learn professional micro, mezzo, and macro practice skills related to the curriculum.
- Maintain regular contact with your Practicum Faculty throughout the internship and discuss any and all questions/issues as soon as they arise.
- Follow all agency, School, or University protocols and complete necessary tasks required to participate in an internship.
- Attend all class sessions.

Note: class attendance and participation are included in your required practicum hours. Any absence from class must be discussed with your Practicum Liaison and alternative options for completing the assignments will need to be identified.

- Complete the assigned electronic learning agreement with the Practicum Instructor by the assigned due date in consultation with your Practicum Faculty.
- Be prepared and actively participate in practicum supervision.
 - A minimum of 1-hour individual/group weekly supervision.
 - Depending on the student's needs, weekly supervision could include group supervision as long as the student has individual supervision at least twice per month.
 - Group supervision may be facilitated by non-social work professionals.
- Turn in the completed [Reflective Learning Tools](#) (RLT). The student is responsible for timely submission to the Practicum Instructor (PI). There are different types of RLT forms students may use. Please consult with the Practicum Faculty.
 - There may be instances where an agency may require the use of agency specific RLT form(s). It is important for students to consult with their Practicum Faculty in these instances.
- Continuously review and evaluate your performance.
- Communicate, consult, and problem solve with the Practicum Instructor, Practicum Faculty, and/or Preceptor for support, concerns/issues, and as needed.
- Participate in Practicum Faculty contact/meeting each semester. Contacts/meetings may be virtual, e-mail or phone.
 - The first required meeting in the first semester will be face-to face via a virtual platform.
 - The subsequent meetings may be done virtually, email or phone.
 - More meetings may be scheduled as needed or as requested by the MSW student, Practicum Instructor, or Practicum Faculty
 - Complete the semester evaluation with the Practicum Instructor (Preceptor if applicable) at the end of each semester.
 - Evaluate your progress in learning the skills in the [CSWE Nine Core Social Work Competencies](#).
 - Verify that required placement hours are being met for each semester. (Refer to Section F, Practicum Education Requirements)
 - PPSC students must complete the PPSC Evaluation Form.
 - Meet the School and the agency objectives and requirements.
 - Meet the required minimum evaluation levels each semester as indicated in the evaluation form.
 - Complete the InPlace Logbook each semester.
 - Discuss the evaluation with the Practicum Instructor (and Preceptor if applicable) and enter the digital signature on or before the identified deadline. Follow the signature protocol after the semester evaluation is discussed and finalized (the student must sign first, then the Practicum Instructor, and finally the Practicum Faculty). Make sure to follow this sequence of steps to avoid any technical issues.
- All paperwork must be completed and turned in before a grade is given for each semester.
- Consult the Practicum Faculty and Academic Advisor if you are a dual degree student.
- Alert the Practicum Faculty immediately if there are any issues or challenges faced by the MSW student. Issues that mandate Practicum Faculty notification include but are not limited to the following:
 - **Any and all harassment (including sexual harassment) and protected-class discrimination issues (see [USC's Office for Equity, Equal Opportunity, and Title IX \(EEO-TIX\)](#))**

- Issues or difficulty in progressing in the [CSWE Nine Core Social Work Competencies](#)
- Any violation of the [NASW Code of Ethics](#)
- Any violation of laws or regulations
- Completing non-approved tasks during internship hours
- Non-compliance with agency policies and protocols
- Excessive absences or non-approved schedule changes
- Delays in the submission of the Reflective Learning Tools
- Documentation issues and delays

Note: USC Suzanne Dworak-Peck School of Social Work is committed to providing all possible help and support to students and early intervention is essential (See Sections F and G below for further details).

Note: Students cannot sign any agency “contracts” nor enter any agreements that refute or negate the provisions in the official agency/organization MOU with the USC Suzanne Dworak-Peck School of Social Work. This includes important policies regarding placement hours and educational calendar events such as finals week.

D. Supervision

MSW candidates are expected to integrate the knowledge and skills learned in the classroom with their internship experience. The student gradually develops his/her identity as a Social Worker and learns the core competencies, values, and ethics of the profession. This is an individualized process and develops over a period. This growth is facilitated by the Practicum Instructor through the process of supervision. The following are some guidelines to help students take full advantage of the internship experience and supervision:

- Follow the School guidelines for placement.
- Be on time for placement, practicum instruction, and Applied Learning In Practicum Education course.
- Behave and dress in a professional manner as defined by the placement.
- Abide by the [NASW Code of Ethics](#). Note that any violation of these standards may lead to dismissal from the MSW program.
- Learn and work to achieve the [CSWE Nine Core Social Work Competencies](#) (grades are based on achieving these competencies).
- Maintain agency standards and practice guidelines.
- Come to supervision prepared with questions and topics for discussion and complete all assignments on time.
- Be open to constructive feedback and make the effort to try or implement the feedback.
- Be proactive in your role as a learner, articulate learning needs, and seek to meet them.
- Complete and submit Reflective Learning Tool (RLT) assignments on time to your Practicum Instructor.
- Share concerns/issues/questions promptly with your Practicum Instructor and/or Practicum Faculty.
- Be self-aware; take time to reflect upon and process feelings, thoughts, actions, and reactions.

Note: Students should approach their work at the agency as they would a place of employment, including discussing any changes and issues promptly and informing the Practicum Instructor and/or Preceptor of illness or absence.

a. Practicum Instruction

Practicum instruction is provided by an individual who possesses an MSW and has at least two years of post MSW practice experience. They must be approved by the School of Social Work and certified to be a Practicum Instructor (see Section IV.B). Practicum instruction takes place between the student and the Practicum Instructor in designated agency settings that have been approved by the Suzanne Dworak-Peck School of Social Work and the University. An External Practicum Instructor (EPI) may be utilized if the agency does not employ an MSW but wants to host an MSW Intern. The same requirements apply to all EPI's.

The USC Suzanne Dworak-Peck School of Social Work and the agency collaborate in assisting students to learn and increase their mastery of the [CSWE Nine Core Social Work Competencies](#). Over the course of the internship(s), practicum instruction is expected to include but not be limited to the following:

- Multi-level practice work: individual, group, and systemic interventions
- Multiple treatment modalities
- Assessment, diagnosis, treatment planning, intervention, outcomes evaluation and termination
- Exposure to multicultural populations
- Advocacy, resource referral, community needs assessment, evaluation and documentation
- Macro skill development such as advocacy, evaluation, fundraising and development, grant writing, program development and others.

E. Safety and Risk Management

It is the student's responsibility to review, understand, and comply with all the policies and protocols included in the [USC Student Handbook](#), [USC Policies](#), [Student Resources](#), [USC Suzanne Dworak-Peck School of Social Work MSW Policies and Procedures](#) and [Practicum Education Manual](#). In addition, it is also the student's responsibility to learn and adhere to all placement agency/organization policies and protocols.

The MSW student/candidate must follow their practicum agency's policies and protocols for reporting safety and risk issues that occur in internship and involve the Practicum Instructor and the Practicum Faculty immediately. This is especially true of any safety issues and policy violations related to harassment, sexual harassment, protected-class discrimination issues, etc. Students can report such incidents to the [USC's Office for Equity, Equal Opportunity, and Title IX \(EEO-TIX\)](#) for support and guidance. Faculty are mandated to report these incidents to EEO-TIX when informed by the students.

F. Challenges and Support

The MSW student/candidate is expected to be an active learner in Practicum Education and accept the guidance, support, and the evaluation of the Practicum Instructor. When there is a mismatch between the student's needs and the available learning opportunities and supports,

challenges and issues may occur. Students are encouraged to follow these protocols to resolve any concerns for immediate resolution to avoid delays in practicum:

- Articulate the problem. Discuss and resolve issues directly with the Practicum Instructor if appropriate.
- Involve and communicate the issue with the Practicum Faculty as early as possible in the process.
- If the issue persists, request the involvement of the Practicum Faculty for mediation/resolution.

The MSW student/candidate must always be cognizant that Practicum Education/Internship is a class. Students must meet the standards for satisfactory academic progress and performance to pass or move forward in the program. Students who abandon class or fail to report regularly to a placement site do so at the risk of a grade of “No Credit” thus placing themselves in academic jeopardy, possible loss of federal financial aid, and/or risk of dismissal from the MSW School (Section V).

Note: It is the philosophy of the School to exert all efforts to resolve issues and try to prevent a re-placement. It is disruptive to the student’s academic programming and to the agency.

The Suzanne Dworak-Peck School of Social Work adheres to all University policies and protocols regarding registration; withdrawal; attendance; grading, grades of in-progress or incomplete; grade appeal; leave of absence; academic probation; equity diversity, & inclusion; FERPA (Family Educational Rights and Privacy Act); and Americans with Disabilities (ADA) accommodations for students. It also adheres to the University policies and protocols in developing student support plans.

The MSW student/candidate must involve the Practicum Instructor and the Practicum Education Office immediately regarding any issues related to Practicum Education. This is especially true of any USC policy violation (i.e., harassment, including sexual harassment, protected-class discrimination issues, etc.) and ADA accommodations. Review the [USC Student Handbook](#), [USC Policies](#), [Student Resources](#), [USC Suzanne Dworak-Peck School of Social Work MSW Policies and Procedures](#) and the [Practicum Education Manual](#) for complete information. In addition, it is the student’s responsibility to learn and adhere to all placement agency/organization policies and protocols.

Note: American Disabilities Act (ADA) accommodations are provided when an official letter of accommodation from the [USC Office of Student Accessibility Services \(OSAS\)](#) is presented by the student to each course instructor of record, placement coordinator, and to their Practicum Instructor. The OSAS will assess, identify, and specify any internship related accommodation(s) needed. Students must submit the required paperwork and documentation to OSAS for both classroom accommodations and internship accommodations through the External Work Place (EWP) application. The accommodations may need to be periodically reviewed.

The accommodation is not retroactive and is only valid when the MSW student submits the letter to each Faculty member. Accommodations are confidential and therefore it is the right and the responsibility of the student to share their accommodation letter with appropriate stakeholder(s) for academic planning.

OSAS has two types of accommodations. One for the classroom setting and a separate accommodation for internship (External Work Place). The classroom accommodation letters

should be shared with their Practicum Liaison for classroom accommodations. To receive accommodations for internship, the EWP accommodation letter must be provided to the appropriate Practicum Placement team member who will comply with required ADA accommodations. Due to confidentiality, students are responsible for sharing their accommodation letters with the **designated agency personnel, including their Practicum Instructor, at their internship.**

G. Professional Expectations

All students are expected to adhere to and follow all ethical, legal, and policy standards and mandates of the Social Work profession, the University and the guiding principle of “Do No Harm” in relation to the well-being of fellow students, agency personnel, clients and the communities in which they work and serve in internships. As in any situation, the placement agency has the right to dismiss a student for unprofessional and unethical behaviors that will prompt an academic review process in the form of a Student Performance Improvement Plan (SPIP).

Any form of violation to the Social Work professional guidelines may lead to a dismissal from the USC Suzanne Dworak-Peck School of Social Work. These links identify policies and procedures pertaining to appropriate behavior including professional behavior, non-threatening conduct and use of social media. It is the student’s responsibility to learn and adhere to the [USC Student Handbook](#), [USC Policies and Policy Governance](#), [USC Integrity and Accountability Code](#), [Campus Wellbeing & Crisis Intervention](#), [USC Violence-Free Campus](#), [USC Office of Professionalism and Ethics](#), [USC Suzanne Dworak-Peck School of Social Work MSW Policies and Procedures](#), [CSWE Nine Core Social Work Competencies](#), [NASW Code of Ethics](#) and [Practicum Education Manual](#).

H. Social Media

The information shared on social media does not represent and cannot substitute for the information or guidance provided by faculty, staff or official program documents and communications, regarding Practicum Education. Official documents, policies, protocols and communications may be retrieved from the [USC Student Handbook](#), [USC Policies and Policy Governance](#), [USC Integrity and Accountability Code](#), [Campus Wellbeing & Crisis Intervention](#), [USC Violence-Free Campus](#), [USC Office of Professionalism and Ethics](#), [USC Suzanne Dworak-Peck School of Social Work MSW Policies and Procedures](#) and [Practicum Education Manual](#), course syllabi and written & verbal communications from Practicum Faculty and Administration. Any Practicum Education related issues, disputes, complaints, or requests should be redirected to the student’s Practicum Faculty or to the Assistant Directors of Practicum Education.

Students should use extreme caution when participating in social media forums. Be mindful of any references to the practicum agency and client related information or interactions. Students are expected to adhere to all legal and ethical responsibilities of the Social Work profession. Keep in mind the public nature of any social media forums despite all security and privacy settings. The USC Suzanne Dworak-Peck School of Social Work has provided a social media guideline for students to use ([USC Suzanne Dworak-Peck School of Social Work MSW Policies and Procedures-Social Media Section](#)). The MSW student assumes responsibility for any social media output that is not pre-approved by the current placement site and/or the USC Suzanne Dworak-Peck School of Social Work.

AI generators, such as ChatGPT4 and Bard, can be useful tools. However, AI programs do not replace human creativity, originality, and critical thinking. AI text generators also may present incorrect or biased information and incomplete analyses. Within limited circumstances, with instructor permission and proper disclosure and attribution (see [USC Libraries' generative AI guide](#)), AI generators may be permitted in this course, per the University's academic integrity regulations. Using these tools without the instructor's permission, and without proper attribution and disclosure, constitutes a violation of academic integrity and will be reported to the [Office of Academic Integrity](#).

IV. PRACTICUM INSTRUCTOR: INFORMATION & RESPONSIBILITIES

A. Introduction

Practicum Instructors play a crucial role in the USC Suzanne Dworak-Peck School of Social Work Practicum Education experience. They provide the students the opportunity to merge previous life and work knowledge with the development of new professional competence. Practicum Instructors must follow the objectives that are specific to the generalist and advanced ISW curricula. The overarching objective of Practicum Instructors throughout the MSW program is to prepare students to enter the Social Work profession.

Practicum Instructors are engaged in three basic Practicum Education components. *First*, they must orient the students to the professional system of the agency, including but not limited to the purpose of the agency, the community it serves, its policies and protocols (particularly risk management & safety), and expectations for professional dress and comportment. The agency/organization orientation and the internship should be geared towards introducing and familiarizing the MSW student to the [CSWE Nine Core Social Work Competencies](#).

The *second* crucial component is the development of the teacher-learner relationship between the MSW student and the Practicum Instructor. This starts at the first contact wherein the Practicum Instructor clarifies and establishes roles, expectations, and the framework for the relationship.

The last and *third* component is the development of broad and rich case assignments and practicum experiences. The MSW student is expected to engage in a wide variety of Social Work activities from the beginning to the end of placement. Practicum Instructors are responsible for providing direct practice experiences consisting of but not limited to the following:

- a) Multi-level practice work: individual, group, and systemic interventions
- b) Multiple treatment modalities
- c) Assessment, diagnosis, treatment planning, and intervention
- d) Diverse populations
- e) Advocacy, resource referral, community needs assessment, evaluation, and documentation
- f) Termination
- g) Macro skill development such as advocacy, evaluation, fundraising and development, grant writing, program development, and others.

Internship is a time-bound experience, and the Practicum Instructor carries the responsibility for planning, implementing, monitoring, and evaluating the student's educational experience based on the student's progress in meeting the [CSWE Nine Core Social Work Competencies](#).

B. Practicum Instructor Qualifications

MSW interns are supervised by Practicum Instructors designated by the agency and the School of Social Work. These Practicum Instructors are committed to teaching and upholding the values and ethics which have been developed over the long history of the Social Work profession. The Practicum Instructor must be identified and must complete the application process at the same time an agency site is approved. New or replacement Practicum Instructors may complete the application process at any time. Practicum Instructors must have the following to qualify:

- An MSW degree from an accredited School of Social Work
- At least two years of post-MSW work experience
- A completion certificate for new practicum instruction class from USC or any Southern California CSWE accredited School of Social Work consortium partners or a plan to attend a minimum of an 8-hour long training for new Practicum Instructors at USC or any Southern California CSWE accredited consortium partners. USC offers an on-line New Practicum Instructor course with synchronous and asynchronous sessions. Participants will receive a certificate of completion of 12 hours of training upon successful completion. No partial credit will be awarded.

In addition, Practicum Instructors must meet the criteria required to teach and support MSW interns in placement. They must also be committed to meet all documentation, supervision, and evaluation requirements of the program, particularly the ability to assess student progress based on the most current [CSWE Nine Core Social Work Competencies](#) identified by the [Council on Social Work Education in the Educational Policy and Accreditation Standards \(EPAS\)](#).

C. Practicum Instructor Tasks & Responsibilities

Practicum Instructors are responsible for the following tasks to meet the Applied Learning in Practicum Education course objectives:

- Meet student(s) prior to the start of the internship for a pre-placement meeting.
- Facilitate and assist with any Human Resources process and/or requirements.
- Provide an agency orientation at the start of internship.
- Clearly define the student's role, tasks, responsibilities, and scope of practice.
- Provide training, consistent communication, feedback, and support to students.
- Assign and maintain a diverse caseload/workload.
- Provide meaningful opportunities to learn professional, direct, and/or macro practice skills related to the student's course of study,

Note: All [forms](#) referenced in the section below can be located on the [Practicum Education](#) website.

- Complete the electronic **Learning Agreement** with the student by the assigned due date during the 1st semester of each new internship:
 - Complete the Practicum Instructor teaching plan.

- Review the internship schedule and student learning objectives with the MSW student(s).
- Write in any approved special schedule arrangement including expectations for semester breaks.

- Provide and review the agency/organization Safety & Risk Management, harassment (including sexual harassment), protected-class discrimination, and antiracist, diversity, equity and inclusion (ADEI) policies and protocols including identifying the individual to whom a report should be made.
- Follow the signature protocol after the learning agreement is discussed and finalized (the student must sign first, then the Practicum Instructor, and finally the Practicum Faculty). For campus-based students, please contact ocpevaluation@usc.edu for assistance. For Virtual Academic Center students, please contact vacpracticumevaluation@usc.edu for assistance.
- Identify and assign a Preceptor as needed (include Preceptor feedback in the Learning Agreement/Evaluation).
- Provide practicum instruction
 - A minimum of **1-hour** individual/group weekly supervision.
 - Depending on the student's needs, weekly supervision may include some group supervision as long as the student has individual supervision at least twice per month.
 - Group supervision may be facilitated by non-social work professionals.
- Review and discuss the required number of [Reflective Learning Tool](#) (the required number of RLTs for each semester will be provided in the syllabus). The Practicum Instructor (PI) must verify the successful completion of all Practicum Education assignments at the end of each semester.
 - Alert the Practicum Faculty if the student has missed submitting 2 RLT's in a row.
 - There are different types of RLT forms students may use:
 - MSW students must use USC approved [Reflective Learning Tool](#) (RLT) form(s).
 - If the agency requires the use of an agency specific RLT form(s), the agency Practicum Instructor and student(s) must consult with the Practicum Faculty for approval prior to use.
- Continuously monitor and evaluate the student's performance.
- Communicate, consult, and problem solve with the Practicum Faculty for support, challenges, and as needed.
- Maintain regular contact with the Practicum Faculty throughout the internship to discuss any and all questions/issues as soon as they arise.
- Participate in Practicum Faculty contact/meeting each semester. Contacts/meetings may be virtual, e-mail or phone.
 - The first meeting in the first semester will be face-to face on a virtual platform.
 - More meetings may be scheduled as needed or as requested by the MSW student, Practicum Instructor, or Practicum Faculty and may take place at the agency.
- Provide opportunities for micro, mezzo, and macro practice work for all students every semester.
- Complete the **Semester Evaluation** with the student at the end of each semester:
 - Evaluate the student's skills in the [CSWE Nine Core Social Work Competencies](#), including feedback from the Preceptor, if applicable.
 - Verify that the student has met the required placement hours for each semester.
 - Verify that the student has met the School and the agency objectives and requirements.

- Verify that the student has submitted the minimum required RLTs.
- Follow the instruction to input any digital signatures on the form.
- Discuss the evaluation ratings with the student and enter the digital signature on or before the identified deadline.
- Follow the signature protocol after the semester evaluation is discussed and finalized (the student must sign first, then the Practicum Instructor, and finally the Practicum Faculty).
- Complete all additional required evaluations. Consult with the Practicum Faculty for the appropriate form(s).
- Provide a grade recommendation on the evaluation form:
 - Recommend a grade of Credit, No Credit Incomplete, or In-Progress. Refer to this website for specific [grading guidelines](#).
 - A “No Credit”, “In Progress” or “Incomplete” recommendation should always be made in consultation with the Practicum Faculty (as early as possible in the semester), documented, and accompanied by a SPIP (copies will be retained by the student, Practicum Instructor, Practicum Faculty, and the Office of Student Affairs will be notified).
 - The Practicum Faculty will approve and assign the final grade.
- Facilitate the scheduled and/or unscheduled termination from the agency.
- Consult with the Practicum Faculty regarding the supervision of dual degree students.
- Alert the Practicum Faculty as soon as possible if there are any difficulties or challenges faced by the student. Issues that mandate Practicum Faculty notification include but are not limited to the following:
 - Any and all harassment (including sexual harassment), protected-class discrimination, and ADEI issues. **Note that the student and faculty are required to report incidents to the appropriate university office**
 - Students are strongly encouraged to report any and all harassment (including sexual harassment), protected-class discrimination, and ADEI issues to the USC EEO-TitleIX office as well as follow agency’s protocols and report the incident and/or behavior to appropriate agency personnel.
 - Issues or difficulty in progressing in the [CSWE Nine Core Social Work Competencies](#)
 - Any violation of the [NASW Code of Ethics](#)
 - Non-compliance and/or any violation with agency policies and protocols
 - Excessive absences or non-approved schedule changes
 - Delays in the submission of the Reflective Learning Tools, Learning Agreement, Logbook of practicum hours and/or Semester Evaluation
 - Documentation issues and delays

Note: USC Suzanne Dworak-Peck School of Social work is committed to providing all possible help and support to students and early intervention is essential (see Section E below for further details).

Note: Students cannot sign any agency “contracts” nor enter any agreements that refute Or negate the provisions in the official agency/organization MOA with the USC Suzanne Dworak-Peck School of Social Work.

D. Practicum Instruction

Practicum instruction takes many forms and methodologies. It ranges from the didactic method to experiential. It also varies in structure and technique. It is influenced by multiple factors such as the agency's focus, available resources, and the skills, interest, and the personality of both the instructor and the student. Although practicum instruction is a highly individualized process, the required components mentioned in the previous section are non-negotiable.

The following are some general Practicum Instructor guidelines for teaching and supervising MSW students and are meant to help establish a supportive learning and working environment:

- Adhere to regularly scheduled practicum instruction conferences with your student.
- Create a supportive environment and a positive teaching relationship considering your teaching style and the student's learning style.
- Be aware that you are the role model for client and peer relationships and interactions.
- Acknowledge authority-dependency conflicts and use them as teaching opportunities.
- Establish your role as both supervisor and teacher early in the relationship.
- Make assignments meaningful and utilize the Reflective Learning Tool early in the relationship.
- Focus on the process and not just the content.
- Balance performance monitoring with positive supportive feedback and genuine praise. Feedback needs to be relevant, clear, balanced and timely. Encourage the student to reciprocate.
- Use case and project analysis in helping students examine their work, meet their learning objectives, process their reactions, and foster self-awareness.
- Assist the student to identify feelings, attitudes, biases, and reactions that affect their work.
- Practicum Instructors, along with Practicum Faculty, serve an educational rather than therapeutic role with students.
- Discuss with the Practicum Faculty if students are in need of additional support and services to be successful in the program.
- Introduce the use of audio taped, video recordings, and/or role-playing to enrich the student's learning.

E. Challenges and Support

Practicum Education is inherently filled with positive and negative experiences and challenges. It is the job of the Practicum Instructor to create a stable learning environment to address these experiences and challenges as learning opportunities and to facilitate the student's educational progress. It is the responsibility of the Practicum Faculty as the University representative to provide support and guidance for the Practicum Instructor and the student to succeed in this endeavor. As part of the process, Practicum Instructors are asked to balance opposing and/or complementary forces such as the following to foster learning:

- Challenge vs. Support
- Autonomy vs. Dependence
- Learning Objectives vs. Agency Objectives
- Authority vs. Mutuality
- Education vs. Training

In most instances, the balancing act is enough to prevent any major problems in the practicum experience. Sometimes it is not sufficient and challenges in the learning process may occur. Some examples are:

- Persistent unprofessional and/or unethical conduct including disruptive behavior
- Conflicts in teaching and learning styles
- Not meeting agency and practicum requirements (charting, documentation, inconsistent or insufficient hours, etc.)
- Insufficient skill or inability to meet learning objectives

When these challenges arise, Practicum Instructors are required to provide an early warning to students of the areas that need improvement, based on the [CSWE Nine Core Social Work Competencies](#):

- Identify and attempt to discuss and resolve the issue(s) directly with the student.
- Document the issue and efforts to resolve it.
- Notify and consult the assigned Practicum Faculty of the issue as soon as possible. If you are not certain who the Practicum Faculty is, email sswpracticum@usc.edu (OCP) or vacpracticum@usc.edu (VAC) to identify the student's Practicum Faculty.
- Invite the Practicum Faculty to mediate if you and the student are unable to resolve the issue.
- If the issue persists, collaborate with the Practicum Faculty to formulate a formal Student Performance Improvement Plan (SPIP) to identify the issue(s) and step(s) to redress the situation.
- If the issue persists, the Practicum Faculty may remove/replace the student. If replacement is indicated, you will be asked to complete an evaluation of the student's progress based on the [CSWE Nine Core Social Work Competencies](#) as of the date of the student's departure from the agency.

It is the philosophy of the School to make all efforts to prevent a replacement. It is disruptive to the agency and to the learning process of the student.

Note: All Practicum Instructors are obligated to respond to any internship related student concerns and to all issues pertaining to Safety & Risk Management, harassment (including sexual harassment, protected-class discrimination, and ADEI issues). **They are also mandated to report certain practicum related issues (refer to the below section) to the University Practicum Faculty as agreed upon in the Memorandum of Agreement (MOA).**

F. Safety and Risk Management Communications

The School recognizes that students cannot be insulated from the risks in providing services to people, institutions, and communities in crisis. Students frequently lack the experience and skills to assess risk and take appropriate precautions. Basic safety measures are thoroughly discussed in the seminar class to help prevent any problems, but sometimes it is still not enough. Practicum Instructors are expected to orient students in basic and agency related policies and procedures that can maximize their personal safety. Practicum Instructors must also review agency safety and risk management policies and protocols with students. Completion of this orientation must be indicated in the Orientation Checklist portion of the Learning Agreement in the first semester of each new internship. It should include but not be limited to the following:

- Building/office security policy
- Fire, earthquake, and other emergency protocols
- Transportation policies and insurance requirements

- Harassment (including sexual harassment)
- Protected-class discrimination issues
- Antiracist, diversity, equity and inclusion practice
- Home / School / community visit safety policy and protocols
- Crisis intervention and disaster protocols
- Emergency and support contacts
- HIPAA compliant communication protocols including policy on use of personal and/or University email addresses or personal devices
- Federal, state, local, and agency/organization specific safety and risk management policies and protocols

Periodic review of these safety measures is strongly recommended. All Practicum Instructors are obligated to respond to any student related concerns pertaining to Safety & Risk Management, harassment (including sexual harassment); and protected-class discrimination issues. They are also mandated to report all issues to the University Practicum Faculty as agreed upon in the Memorandum of Agreement (MOA).

Note: All MSW students are required to learn and understand all Social Work profession expectations and all University and agency policies and protocols. Practicum Instructors are encouraged to do the same ([NASW Code of Ethics](#), [CSWE Educational Policy and Educational Standards \(EPAS\)](#), [USC Student Handbook](#), [USC Policies and Policy Governance](#), [Campus Wellbeing & Crisis Intervention](#), [USC Office of Professionalism and Ethics](#), [USC Violence-Free Campus](#), [USC Integrity and Accountability Code](#), [USC Suzanne Dworak-Peck School of Social Work MSW Policies and Procedures](#), and [Practicum Education Manual](#)) to be able to guide and support MSW students in their new role as Social Work Interns.

G. Practicum Internship Interruption, Jury Duty, and Strike Policy

The USC Suzanne Dworak-Peck School of Social Work acknowledges that there may be temporary interruptions to students' MSW placements due to local, regional, or national local events such as a natural or man-made disaster, civil unrest, and/or pandemics. Practicum Education is also aware of the potential for any agency or organization disruption related to strikes or any work actions. The safety and well-being of MSW students are the School's priority. Practicum Education will respond based on the principles of educational integrity, focusing on how educational expectations, goals, and objectives can be met and maintained.

Students summoned to Jury Duty are to inform their faculty liaison and practicum instructor immediately. Students are encouraged to postpone their service to a time when their internship is not impacted (i.e. a semester break or after the completion of their internship). However, if this is not possible, the program will advocate with the agency to allow the student to continue to accrue internship hours with appropriate documentation of the length of time requested for jury duty. The faculty liaison and the practicum instructor will collaborate to create a remote practicum learning plan for the duration of jury duty. It is the responsibility of the student to keep the practicum instructor and faculty liaison involved in this planning.

In the case of any critical incident, the priority is the student's safety, and the primary consideration is the student's educational experience rather than the merits of any given interruption. It is the School's belief that some interruptions may not provide a climate

conducive to a sound educational experience. Practicum Education will make the assessment and decide on a course of action depending on the situation. The Practicum Faculty and Practicum Instructor will coordinate and organize alternative plans to support the training and the continuation of Practicum Education for students (See Appendix I and for possible course of action).

Practicum Education's policy regarding agency strikes/work actions is based on the principles of educational integrity. The primary consideration is the student's educational experience rather than the merits of any given strike or work action. It is the School's belief that a strike bound agency is not able to provide a climate conducive to a sound educational experience. Practicum Education will make the assessment and decide on a course of action depending on the situation. The USC Suzanne Dworak-Peck School of Social Work encourages the Faculty Practicum Faculty and Practicum Instructor to organize opportunities for students to learn from all parties and engage discussions regarding the issues at hand (See Appendix J for possible courses of action).

V. FAILURE TO MAKE SATISFACTORY PROGRESS IN PRACTICUM EDUCATION – ACADEMIC WARNINGS

All USC students are entitled to fair warning and non-arbitrary dismissal procedures. The University of Southern California Catalog describes these procedures in the section "[Academic Warning and Dismissal](#)" of [Graduate Students](#)" and [USC Suzanne Dworak-Peck School of Social Work MSW Policies and Procedures](#). This section of the [Practicum Education Manual](#) provides specific policies and protocols for Academic Warning and Dismissal of Graduate Students as they relate to the internship.

A. Level I: The First Academic Warning – Student Performance Improvement Plan (SPIP)

Students who fail to make satisfactory progress in the Applied Learning in Practicum Education courses will be informed by the Practicum Instructor and Practicum Faculty. Satisfactory progress is measured by the student's timely completion of the required number of hours and assignments in placement each semester as described in the syllabi, as well as developing and building proficiency in the [CSWE Nine Core Social Work Competencies](#).

A **Student Performance Improvement Plan (SPIP)** is considered the first written academic warning and is required as early as possible in the first semester as well as all the subsequent semesters if a student shows signs of:

- Failure to complete the required number of hours in placement and/or
- Failure to submit [Reflective Learning Tools](#) in a timely fashion and/or
- Failure to develop proficiency in any of the [CSWE Nine Core Social Work Competencies](#) and/or
- Failure to adhere to the [NASW Code of Ethics](#)
- And failing to meet any other professional expectations as identified by the Practicum Instructor and/or Practicum Faculty

The Practicum Faculty will contact the student and will schedule a Practicum Education Review Meeting with the student and Practicum Instructor. During the meeting, the Student Performance Improvement Plan (SPIP) will be reviewed and finalized by the Practicum

Faculty. The intent is to identify the specific areas in which the student must improve to successfully complete the program. The document should include the following information:

- Specific actions, behaviors, or events that would constitute unsatisfactory progress, such as but not limited to the following:
 - Failure to complete number of required practicum hours within the semester
 - Excessive absences from the placement agency
 - Failure to meet with Practicum Instructor and/or Preceptor on a weekly basis
 - Failure to comply with agency policy and procedure
 - Failure to respond to placement related requests made by designated practicum personnel, Preceptors/Agency Task Supervisors, Practicum Instructor and/or Practicum Faculty
 - Failure to present oneself in a professional manner as defined by the agency and the [NASW Code of Ethics](#) when interacting with clients, peers, faculty and agency personnel
 - Failure to complete the required Reflective Learning Tools
 - Excessive self-disclosure of personal information which has a deleterious effect on clients
 - Abandonment of Placement
 - Changes in internship placement without the approval of a USC Practicum Faculty e.g., students may not render a “resignation” or abandon their placement
 - Refusal to work with any Practicum Education Administration and Practicum Faculty/Staff including External Practicum Instructors and/or Preceptors/Agency Task Supervisors
 - Failure to respond to any communication attempts (phone, e-mail, and/or letter), which can place the student at risk of dismissal from the program
 - Refusal to work with the assigned Practicum Instructor
- Specific actions, behaviors or events that would constitute satisfactory academic progress, such as but not limited to the following:
 - Submit a completion plan with a specific timetable and deadlines
 - Submit all missing RLTs by a specific date and submit all future RLTs on a weekly basis as required
 - Desist from self-disclosure during individual and/or group therapy
- Specific dates within which these actions, behaviors or events must take place
- Consequences of failing to meet deadlines, including risk of dismissal from the program
- Space for the student to sign and date the letter as an indication of receipt and understanding

B. Level II: The Second Academic Warning – Failure to Improve

If the student was terminated by the practicum site due to student’s performance issues and/or does not meet the deadlines and expectations set forth in the Student Performance Improvement Plan, an Academic Review Meeting will be conducted with the Assistant Directors of Practicum Education, Practicum Faculty, Academic Advisor and/or a representative from Student Affairs as needed. A written summary letter of the meeting will be provided to the student. The letter is the second level of written warning that the student is at serious risk of dismissal from the MSW program.

C. Level III: Dismissal and the Appeal Procedure

A student who continues to fail the Practicum Education courses, fails to meet the Core Competencies, and/or who engages in unethical/illegal behavior will be dismissed from the MSW program. The Assistant Director of Practicum Education in collaboration with the Director of Practicum Education will make the final determination for dismissal if and when a student continues to fail to meet the expectations of the MSW program despite Level I and Level II early interventions and academic warnings.

The student will receive a formal letter of dismissal from the Office of the Associate Dean of Community and Clinical Programs. Students who wish to appeal the dismissal must contact the Office of Student Affairs by the specific date indicated in the formal letter. The student must engage in a formal appeals process as outlined in the [USC Suzanne Dworak-Peck School of Social Work MSW Policies and Procedures](#):

“In compliance with the academic policies outlined in the USC Student Handbook under University Governance and Academic Policies, the school has two levels of appeal for disputed dismissal from the program: 1) Dean and 2) Office of the Provost. Students wishing to appeal Dismissal from the program must submit to the Suzanne Dworak Peck School of Social Work Assistant Dean of Student Affairs a detailed narrative explaining the reason(s) for the appeal. The student should also outline the outcome/resolution that he or she is seeking. A written decision will be sent to the student after review. Normally the decision should be sent to the student within approximately 15 days after the review. This time may be extended if necessary. The student should be informed in writing if the decision will be delayed....

The USC Student Handbook specifies the student may appeal to the Office of the Provost. That appeal should be sent to the associate dean for graduate academic affairs in the Graduate School.”

Note: Students are responsible to review, understand and comply with the policies and protocols contained in the [USC Student Handbook](#), [USC Suzanne Dworak-Peck School of Social Work Policies & Procedure](#), and [Practicum Education Manual](#).

D. Students Terminated/Dismissed from the Placement Agency or Organization

Placement agencies have the right to terminate/dismiss students at any time due to behaviors that the Practicum Instructor, agency director and/or administrator deem inappropriate or unethical. These are infrequent but problematic occurrences that represent a serious setback to and a disruption of the student’s academic progress and the student’s ability to successfully complete the MSW degree. Once terminated/dismissed, the student will receive No Credit for their Practicum Education class including losing all hours accumulated for that semester. A Student Performance Improvement Plan will automatically be generated, and a review meeting will be convened.

Based on the deliberations of the Practicum Faculty and Practicum Education administrators, the student may be allowed a second placement. However, nothing from their prior Practicum Education class, including practicum hours from the previous placement, will be “rolled over” into the second placement or credited to the student.

Should the student be asked to leave the second placement, no further placements will be

assigned. The student will receive a written notice of a “No Credit” grade for the Applied Learning in Practicum Education class and the student will be considered for dismissal from the MSW program.

Meeting the requirements for overall grade point average is not sufficient to successfully complete the requirements of the MSW degree. If a student maintains a high grade point average but fails to adhere to the [NASW Code of Ethics](#) and to achieve proficiency in the [CSWE Nine Core Social Work Competencies](#), that is considered grounds for dismissal.

E. Grounds for Dismissal from the MSW Program (based on the NASW Code of Ethics and the State Behavioral Health Licensure Standards)

The Social Work profession is solidly grounded in the [NASW Code of Ethics](#) which defines the professional standard of behavior that practitioners and graduate students must maintain in their work with and behavior toward clients and peers. State behavioral health and professions laws further define behaviors considered so egregious that licensure of a practitioner is denied or revoked.

Consequently, immediate dismissal from the MSW program is based upon these two professional benchmarks: Ethical principles as elucidated in the [NASW Code of Ethics](#) and state behavioral health licensure standards. Grounds for immediate dismissal from the MSW program therefore include but are not limited to the following:

- Sexual and/or other inappropriate relationships with clients including interactions within the agency and outside the agency involving exchange of money, cohabitation, or harassment.
- Fraudulent documentation of patient contact, particularly false documentation that may trigger government or private insurance payments and reimbursement for services that were not provided.
- Behaviors that demonstrate callous disregard of the health, safety or wellbeing of self, clients, peers and/or agency staff.
- Actions which cause agency disruptions and create a hostile and/or unsafe work environment.
- Actions which breach patient/client confidentiality including unauthorized access to patient records or misuse and unethical reporting of confidential information to others, thereby violating patient/client rights to privacy.
- Falsification of student practicum hours or any misrepresentation of student participation in the internship or required internship activities or assignments. Including but not limited to completing non-internship assignments/activities during designated internship hours without prior approval of the Practicum Instructor and Practicum Liaison.
- Falsification of client or agency records or any documentation and fraudulent billing.
- Class abandonment – leaving the placement without notification or approval from all of the following individuals: the Practicum Instructor, the Agency Director, the USC Practicum Faculty and the Assistant or Director of Practicum Education. In the internship, class abandonment is made more egregious and deemed unethical because agency clients, who are fragile and are seeking help, are abandoned by the student’s abrupt departure.

Note: It is the responsibility of the student to read and understand the criteria by which academic progress is defined in the course syllabi, the information provided by the [Office of Student Affairs](#), and the information provided in the [Practicum Education Manual](#).

VI. APPENDIX

Resources

1. [Practicum Education Website](#)
2. [Practicum Education Forms](#): Calendar, MOU, New Agency Information Packet, Reflective Learning Tools, Learning Agreement/Evaluation, etc.
3. [MSW Curriculum](#)
4. [Student Resources](#)
5. [NASW Code of Ethics](#)
6. [Council on Social Work Education](#)
7. Policy Regarding Placement Interruption due to Critical Incident:

If students are advised by their internship agency, USC, or its representatives, and/or government officials not to attend their placement or if safety or health concerns warrant a temporary interruption in placement, they should immediately consult via telephone, email or virtual communication with their Practicum Faculty, Practicum Instructor, and Preceptor (if assigned).

If the placement interruption is less than a week, it is anticipated that the hours missed will be absorbed relatively seamlessly throughout the semester. If the placement interruption continues for more than one week, missed practicum hours will need to be made up with a specific plan. Students will be given opportunities to make up hours by putting in extra time each week, attending internships during semester break periods, or extending their internship after the end of the semester. If the interruption continues beyond a two-week period, the Practicum Faculty will be in communication with the agency regarding its ability to return to normal functioning while providing students with appropriate supervision and educational experiences. If the interruption continues beyond a 30-day period, the Practicum Faculty in collaboration with placement team members and Practicum Education administrators, will determine the most appropriate response to support student completion of their placement requirements.

The School's [Practicum Education Manual](#) addresses placement interruptions by emphasizing the needs of students and "educational integrity." In accordance with the Council on Social Work Education (CSWE), the manual focuses on "how educational expectations, goals and objectives can be met and maintained" when agency disruption occurs. To mitigate the impact of extended placement interruption, USC encourages **virtual/off-site learning activities** that fulfill intern hour requirements, increase student educational competencies, and meet the needs of the agency.

Virtual Continuation of Services Developed by the Agency

Agencies may choose to develop internal plans for the continuation of services via virtual technology. Students are expected to actively participate and, if appropriate, assist in the development of these endeavors:

- **Agency organized activities:** program planning, meetings, and group activities organized remotely by the agency.
- **Change management:** participate in the agency's change management team as it plans and implements the internal processes and external communication needed to manage the disruption in agency functioning.
- **Client meetings (individuals, families, groups, organizations, and communities):** utilize teleconferencing applications (could include USC-sanctioned programs such as Zoom or Blackboard) that meet agency and [NASW Code of Ethics](#) standards regarding confidentiality, FERPA and HIPAA requirements.
- **Supervision:** participate in weekly supervision using teleconferencing applications.

Off-site Learning Activities (not a comprehensive list)

During temporary practicum interruptions that are expected to extend beyond two weeks, Practicum Instructors, Preceptors and Practicum Faculty should assign students off-site learning activities compatible with CSWE competencies. **All activities must be pre-approved by the agency Practicum Instructor and Preceptor, if assigned, in consultation with the student's Practicum Faculty.** Examples of School-approved off-site practicum learning activities include:

- **Community networking/resource development:** teleconference with various service providers, participate in asset mapping, and develop a list of resources for clients with services offered, referral process detailed, and eligibility requirements described.
- **Grants:** research potential grant opportunities and/or write sections for a grant proposal.
- **Groups/workshop curricula for clients:** develop curricula for implementation with clients (e.g., grief, trauma, domestic violence, anger management, restorative justice).
- **Legislative policy review:** review relevant laws and policies impacting the agency client population, provide a summary of findings, and/or prepare advocacy materials (e.g., letter to editor, develop key talking points, create infographic or PSA).
- **Literature review:** conduct a literature review on specific topics relevant to placement (e.g., effectiveness of an intervention, how interruption of services impacts mental health or economic stability).
- **Materials for clients:** develop handouts/flyers/brochures (e.g., explain voting rights, informed consent policies).
- **Organizational policy review:** review agency policies and recommend appropriate updates (e.g., policies on safety, diversity, use of social media, technology utilization).
- **Trainings for agency:** develop trainings to benefit agency (e.g., self-care, ethics).
- **Webinars and trainings:** complete approved online trainings and provide a certification of completion for the Practicum Instructor's records, write a reflection, and/or prepare a presentation to disseminate knowledge gained. Training examples may include:

Practicum Instructors, Preceptors and Practicum Faculty in consultation with students may also come up with additional activities or trainings. Collaboration among these four key individuals during times of placement interruption increases the likelihood of optimal student health, safety, and learning experiences that align with agency, School, and CSWE expectations.

A. Strike Policy Course of Action:

If an agency is in a bona fide strike situation prior to the beginning of the placement period, no students will be placed for practicum work in that agency for that academic year. If the agency reaches resolution of the strike situation at some point during the academic year, the agency may be used for a mid-year placement depending on re-assessment of the agency and its ability to meet the learning and educational expectations of the department. This assessment will be completed by one of the Practicum Faculty.

If a strike or work action situation occurs in an agency where students are in placement during the academic year. These options may be considered:

1. The student may request not to remain in the placement agency during the period of the strike or work action. The student will be supported in this decision by the department and will not suffer any academic consequences. The practicum hours missed during the strike period will need to be made up by the student during the regular semester, break periods, and/or in an extended placement beyond the academic year. A plan for missed hours make up will be developed by the Practicum Faculty in consultation with the student, the Practicum Instructor and the Associate or Assistant Director as needed.
2. The student may request to remain in the placement setting during the period of strike or work action. This option will be available only when the department can be sure that the educational integrity of the placement can be maintained. This means that the supervisory requirements, caseload requirements and other expectations of practicum can be consistently met by the agency during the strike or work action period and that there is no danger to the student. Students wishing to remain in the agency must discuss this plan with the Practicum Faculty who will verify the agency's ability to provide appropriate supervision and educational experiences. The student will be supported in this decision and will not suffer any academic consequences.

If a strike or work action continues beyond a three-week period, a reassessment of the ability of the agency to provide the appropriate supervision and educational experiences will be made by the Practicum Faculty. If the agency is found not able to meet the educational requirements of Practicum Education, the student may be relocated to another agency site until the strike or work action have been resolved, and/or until the agency is able to provide the appropriate educational activities; or the student may be replaced.

B. Notice of Possible Background Checks, Fingerprinting, Drug Testing, and/or Health Screening:

The University of Southern California, Suzanne Dworak-Peck School of Social Work does not require background checks, drug testing or fingerprinting for admission into the social work program. However, external facilities may require social work students to provide a security clearance, background check, health screening, and/or other additional information in order to participate in internships at their sites. The successful completion of internships is a prerequisite for earning a social work degree from USC.

The following are the areas of inquiry typically covered in a background check, although some clinical sites may require a more comprehensive background check:

- A sex offender database search;

- A seven-year review of a student's criminal court history, including arrest records and records of misdemeanor and felony convictions
- Address verification;
- Two name verifications (e.g., current legal name and one other name [AKA]);
- Three county check of records;
- Search of the Department of Health and Human Services Office of the Inspector General database of excluded persons; and
- Social Security number verification
- Division of Motor Vehicle record or abstract.

Students are solely responsible for obtaining the documentation needed to satisfy the background check and additional testing requirements of a clinical site. Fees required to obtain the background checks and any additional tests are also the sole responsibility of the student.

Refusal to satisfy the background check and additional testing requirements for clinical placement, or failure to pass these checks and tests, may severely limit placement options and may cause a delay in advancing in the MSW program or prevent graduation due to the student's inability to complete Practicum requirements. In such an event, while USC will attempt to place the student at an alternative agency, USC cannot guarantee the availability of placement sites or the student's acceptance into those sites. In such cases, the student may not be able to earn the MSW degree.

The results of the background checks and any additional testing should be reported directly to the agency site. USC does not require a copy of the results but may request confirmation from the student or agency that all requirements for placement have been satisfied.

USC, and its trustees, agents, and employees, are not responsible for any claims and liabilities arising out of or in any way related to the background check or additional testing requests or disclosures made to the internship sites.