



HB96 WORK-BASED LEARNING PROGRAM IMPLEMENTATION GUIDANCE MEMO

To: State Institutions of Higher Education

From: Chancellor Mike Duffey

Date: July 23, 2026

RE: HB96 Work-Based Learning (WBL) Program Implementation Plans

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The Ohio Department of Higher Education (ODHE), in accordance with Ohio Revised Code Section 3345.83, releases the following guidance to state institutions of higher education outlining the expectations for work-based learning (WBL) implementation over the next two academic years, 2026 – 2027 and 2027 – 2028. The Chancellor of Higher Education expects institutions to take this opportunity to assess their existing infrastructure to support WBL and set robust and realistic goals to increase opportunities and support services for students to secure work-based learning experiences such as co-ops, internships, apprenticeships, and externships.

This memo includes the outline of the goals, structure and parameters for a Work-based Learning (WBL) Plan that each institution must submit to the ODHE RFP Portal by Thursday, September 10, 2026.

Timeline

Summer 2026 – Fall 2026: Institutions develop implementation plans. ODHE will provide feedback and request revisions, if needed.

Fall 2026 – Spring 2027: Institutions begin pilot implementation and troubleshoot.

Mid-Spring 2027: Institutions submit mid-year reflections on areas for improvement or program changes that differ from the ODHE approved plan.

Summer 2027: Submit pilot data. Update plans and goals for AY 27-28.

Beginning of Fall 2027: Institutions must implement programs as agreed upon with ODHE.

Summer 2028: Submit data.



I. Summary of Legislative Requirements

Relevant Statute: [Ohio Revised Code Section 3345.83](#)

- “Co-op internship program” must be developed and implemented by AY 27-28, with first annual report submitted to ODHE by June 30, 2028
 - Report must follow ODHE template including, but not limited to, student participation numbers, partnering employer details, and job placements resulting from student participation in work-based learning experiences.
- Work-based learning (WBL) experiences must be structured such that the WBL experience is related to a student’s course of study.
- Work-based learning opportunities should prioritize alignment to JobsOhio’s target economic sectors and increase engagement and placement with Ohio-based employers.
- Institutions must work with JobsOhio to develop and implement their program, which must include identifying industry and employer partners.

II. Program Goals, Structure and Parameters

ODHE, in consultation with JobsOhio, as required by Ohio Revised Code Section 3345.83, defines eligible WBL opportunities as experiences that meet all five of the following criteria:

1. Employer involvement/engagement with student;
2. Relevance to coursework and/or technical skills for an intended career path, validated by a faculty member or career or academic advisor assigned to the student;
3. Student product or outcome, which must be one of the listed options in Section V of this memo;
4. Professional skill development necessary for Ohio’s graduates to gain employment in in-demand occupations, demonstrated by a student self-reflection or updated student resume; and
5. Total time commitment equal to or greater than 40 hours within one semester (Summer/Fall/Spring) or 15 consecutive weeks.

Examples of eligible WBL experiences include co-ops, internships, externships (that meet the length requirement), apprenticeships, research, project-based capstones, performance exhibitions, clinicals/practicum. An institution may identify other experiences that meet the five components above and could be considered eligible for the ODHE data required for submission.

Service learning, work-study, part-time employment not relevant to the student’s intended career path, or other employment that does not meet criterion #2 is not eligible.

Institutions must develop a plan to increase WBL opportunities for students enrolled in any undergraduate or associate degree program of 30 credit hours or more.



Institutions shall develop yearly goals to increase or maintain participation in WBL experiences until at least 75% of the undergraduate student population has the opportunity to participate, measured by each graduating class. Institutions are expected to coordinate resources to collect the requisite data around student participation and employer engagement in WBL. ODHE expects institutions to invest in support services and infrastructure to facilitate increased engagement between students and employers that provides opportunities for students to secure WBL experiences.

Institutions are expected to set incremental goals at a minimum of 2-5% participation growth per year. Institutions will submit regular reports and annually provide updated plans describing their outreach strategies and implementation improvements to meet these goals.

Institutions shall also involve JobsOhio and/or JobsOhio network partners and other workforce partners to increase engagement with Ohio-based employers and prioritize opportunities for students in the state's major economic sectors. JobsOhio and JobsOhio network partners, the Ohio Chamber of Commerce, and the Ohio Chapter of the National Federation of Independent Businesses, in partnership with ODHE, will facilitate regular gatherings between employers and institutions on a state and regional level. Institutions will be expected to attend at least one gathering annually, or provide evidence of working with JobsOhio individually at least once every academic year.

JobsOhio shall provide employers with resources developed with ODHE to support engagement in WBL, particularly in target economic sectors.

Institutions are encouraged to prioritize JobsOhio's target economic sectors in their annually submitted outreach plans. Institutions should demonstrate this prioritization with intentional outreach and programmatic alignment. ODHE will review plans for evidence that institutions considered how regional economic sectors could be integrated in employer and student outreach.

III. Implementation Plan Requirements and Submission Instructions

Institutions must submit a HB96 Work-based Learning (WBL) Program Implementation Plan that responds thoroughly to each of the criteria below. Plans should be robust, feasible to implement, and realistic. ODHE will review and reserves the right to request revision of plans submitted by institutions. The 2026-2027 WBL Implementation Plan is due September 10, 2026. ODHE will begin to provide feedback to institutions in October.

This guidance applies to all undergraduate (including associate) degree-seeking students.

Institutions will be expected to report data annually for any undergraduate students who complete eligible WBL (defined in Section I of this memo). The long-term goal of 75% of undergraduate students completing at least one (1) WBL experience by graduation will be calculated from the total undergraduate (including associate) enrollment.



Work-based learning in the scope of this program refers only to eligible work-based learning that meets the five criteria established in Section I of this guidance memo: employer engagement, student product/outcome completion, academic relevance, professional skill development, and a total minimum time commitment of 40 hours.

Please use the ODHE RFP Portal to submit responses to the criteria listed below. Questions about the RFP Portal or HB96 WBL Program Implementation Plan can be directed to the ODHE team at wbl@highered.ohio.gov.

1. Strategic Overview of Program Implementation

- a. Describe how the institution will coordinate the initiative across its departments and institutional leadership's roles and responsibilities.
 - i. Specifically describe how institutional research, academic programs, and career services/workforce development partnerships will be leveraged for success.
 - ii. If the initiative will be decentralized, explain how the departments will work together to ensure students throughout the institution will receive access to similar opportunities and multiple types of support.
- b. Describe alignment with other strategies, including HB 96 Sec. 381.750 workforce readiness in general education requirements.
 - i. The institution could include how it plans to leverage other state grants such as Choose Ohio First, RAPIDS/Super RAPIDS, or Behavioral Health Workforce Incentives.
- c. Identify key internal and external leaders and primary contacts for ODHE, employers, and students.

2. Existing Infrastructure for Career Services and Work-based Learning

- a. Describe ongoing campus initiatives supporting career readiness training, professional skill development, and job placement opportunities. Institutions are expected and encouraged to leverage existing infrastructure towards this initiative.
- b. As of the end of AY 25-26, describe the institution's current ability to track work-based learning placements for students enrolled in associate and undergraduate degrees. The description should include data collection capabilities, institutional capacity, and history with WBL student tracking. Please describe any significant limitations and how they will be overcome to comply with this guidance.
 - i. Describe any software applications or systems used to track student engagement with career services and placements in WBL.
 - ii. Provide the institution's current, verifiable number of the targeted student population participating in an eligible work-based learning experience for the AY 25-26 graduating class?
 1. Describe how this was collected and calculated.



3. Identify Areas for Growth and Goals

- a. Describe proposed strategies and actions the institution intends to use in AY 26-27 to increase the number of work-based learning opportunities available to students.
 - i. Identify targeted populations
 1. If focusing on limited number of departments or majors, how was this choice made and why?
 2. How will the JobsOhio targeted sectors be included or prioritized?
 - ii. Describe which work-based learning opportunities will be prioritized (internships, co-ops, project-based classroom experiences, research, etc.) and why was this decision made.
 1. What existing infrastructure supports this focus?
 2. What additional resources are necessary to support?
 - iii. Describe outreach methods to students.
 - iv. Describe support services students will receive from the institution.
 - v. Describe what policy changes at the institution will need to be implemented.
 - vi. Describe how resources will be utilized to further develop data tracking mechanisms.
- b. Identify the key performance indicators used by the institution at the end of AY 26-27 to evaluate the program and make improvements for AY27-28.
- c. By the end of AY 26-27, what number of students and/or percentage does the institution expect to be recording participation in a work-based learning experience?
- d. By the end of AY 27-28, what is the anticipated number of students and/or percentage participating in a work-based learning experience?
- e. How will the institution conduct regular internal assessments to make improvements or changes to meet these goals?

4. Employer and Industry Outreach Plan

- a. Describe the institution's current strategies, staffing, data systems, and other institutional infrastructure for employer outreach and industry engagement, particularly for those employers and industries highlighted as JobsOhio's target economic sectors.
- b. How will the institution partner with JobsOhio and other regional or local workforce entities, such as chambers of commerce and industry sector partnerships, to identify new employer partners or industries with the capacity to support student WBL?



IV. Data Collection Requirements

ODHE will collect annual reports from institutions. Institutions are not required to submit the supporting documentation to ODHE unless requested in an audit. Institutions must maintain records for four years to confirm that the five components for eligibility were validated with student, employer, and faculty/advisor signatures.

Student data for fall, spring, and summer semesters will be collected annually. Data for all enrolled students who meet the eligibility will be required for AY2027-2028. ODHE recognizes AY2026-2027 will be a pilot year to implement data collection practices and encourages institutions to try to collect the below information for AY2026-2027 as possible to help prepare the institution and provide ODHE with a more accurate baseline of participation. ODHE acknowledges that some data will be improved over multiple cohorts as institutions build their data capacity.

At minimum, the following information will be required.

- Student information for each student reporting eligible WBL:
 - Student HEI ID
 - Student Program of Study CIP Code
 - Student Enrollment Year at Institution for above Program
- Employer information for each student WBL experience recorded:
 - Employer Name
 - Employer EIN
 - 2-digit NAICS code
 - Employer Location/Address
- Job placements as a result of WBL experiences, as reported by students
 - ODHE is investigating future opportunities to integrate state data systems to track employment outcomes.
 - For the pilot period, if a student self-attests to accepting a full-time offer at the employer with whom they completed their WBL, institutions can indicate that with a Y/N/Unknown dropdown in the report.

During the pilot year, AY2026-2027, ODHE will utilize a Qualtrics survey to collect aggregate data for the annual report due in June 2027. ODHE plans to release guidance for a new feature in the ODHE Higher Education Information System (HEI) that will allow for student reporting to occur in HEI in the future. ODHE will work with institutional research (IR) teams to gather information and understand barriers prior to making any changes. ODHE will also collect an annual Qualtrics survey requesting information around career services offerings, implementation progress, and updated implementation plans.



V. Student Work-Based Learning Experience Verification Documentation

ODHE has provided a template for collecting information for work-based learning experiences. Institutions may develop their own forms and require any additional information as long as the information from the ODHE template to report work-based learning experiences is collected.

1. **Proof of employer involvement**, as documented by a letter from a supervisor, paystubs, performance evaluations, or other documents that can verify the employer has engaged with the student. Documentation must include the employer's name and contact information.
2. **Proof of relevance to coursework and/or technical skills for an intended career path**, as supported by a faculty member, academic advisor, or career advisor associated with the student. The faculty member or advisor must have taught the student in at least one course or have been specifically assigned to the student or the student's program of study as an advisor by the institution. The validation should include a brief attestation (1-2 sentences) speaking to relevance of the experience to coursework/intended career path and a signature.
3. **Proof of the student's product or outcome** through work-based learning, attested to by a faculty/advisor/employer supervisor, which must be one of the following:
 - a. A publication,
 - b. A poster presentation accepted to an exhibition or conference,
 - c. Record of payment,
 - d. Academic credit (zero-credit is allowed),
 - e. Record of presenting in a professional showcase, which could be a conference hosted by a professional association, or include employer-verified creative and performance work — such as a commissioned piece, a performance completed for a paying venue, a broadcast segment, or a juried exhibition entry,
 - f. A prototype
 - g. Industry-recognized certification or licensure completion,
 - h. Portfolio of work samples/deliverables for a client or employer,
 - i. Letter of recommendation from employer,
 - j. Or, employer performance evaluation.
4. **Evidence of professional skill development** through work-based learning. Students must complete a self-reflection on the experience or update and submit a resume to their faculty/advisor in which the student articulates how they have developed skills (technical and/or interpersonal) that prepare them for full-time employment.
5. **Proof of a total minimum time commitment equal to or greater than 40 hours**. Documentation could include time sheets, a letter from the employer, a contract, or attendance report. The 40 hours must be completed within one (1) semester or 15 weeks.