



Internship Programs Policies and Procedures

Career Center Department

Division of Student Affairs

University of North Texas

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I. MISSION & VISION

Mission

At the University of North Texas, our caring and creative community prepares students for careers in a rapidly changing world.

Vision

As the most comprehensive public research university providing a top quality education in one of the nation's largest, most dynamic regions, UNT will be celebrated for its academics, arts and athletics. UNT will be a diverse and inclusive institution creating knowledge and innovations that will shape the future, while cultivating excellence in the next generation of scholars and leaders for the global community.

II. DEFINITION & OBJECTIVES

A. Definition of Terms

Academic Advisor: The person assigned to assist a student in planning for the completion of the academic requirements

Supervisor: the member of the cooperating agency's staff who is assigned primary responsibility for coordination and evaluation of the internship of a particular student

Faculty Internship Advisor: The Department faculty member assigned to assist a student in planning for the completion of requirements for a particular internship

Internship Coordinator: The Career Center staff member assigned to assist a student in planning for the completion of requirements for a particular internship

Learning Objectives: A statement describing a specific, intended result of an internship to be used as one means of measuring the accomplishment of the student during the experience

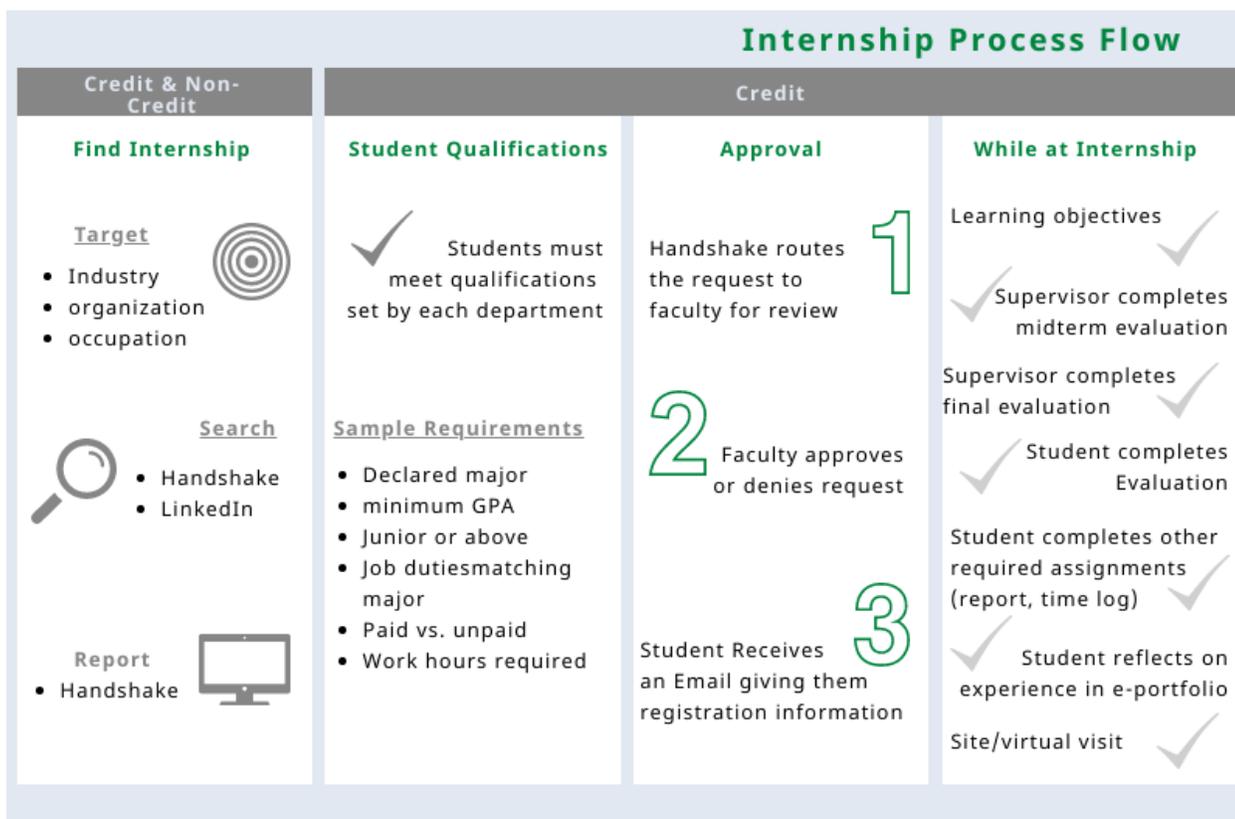
B. Internship Overview

“Work experience via an internship is no longer a ‘nice to have’ but a must have”

The purpose of this handbook is to clarify the requirements of the internship and the responsibilities of the parties who are involved. The internship is a three-way partnership with the student who is interning, the employer who is providing the internship opportunity, and the university.

This manual provides students and employers with a template to facilitate a productive and educational work experience. The internship is a beneficial part of the student’s program of study at the university which formally integrates the student’s formal academic study with a practical, on-the-job work experience with a cooperating employer. This is an opportunity for the student to formally blend theory and practice in his or her chosen field of study.

III. UNT INTERNSHIP PROCESS FLOW



Find Internship

Student finds internship utilizing resources such as Handshake, LinkedIn, and company websites. Once obtained, the student reports the experience in Handshake. If the student is seeking credit, this is where the approval process begins. If they are not receiving credit, this information is still vital to report, as it aids the university in helping other students benefit from these valuable experiences.

Helpful Articles	URL
About Experiences	https://support.joinhandshake.com/hc/en-us/articles/360020997154-NEW-About-Experiences
How to Request an Experience (as a Student)	https://support.joinhandshake.com/hc/en-us/articles/360021202253
How to Create an Experience (on behalf of a student)	https://support.joinhandshake.com/hc/en-us/articles/360021200653-NEW-How-to-Create-an-Experience-on-behalf-of-a-student-

Student Qualifications

Each department sets certain qualifications for a student to be able to accept an internship. These requirements range from GPA, class year, major, etc. It's important that a student knows if they meet these qualifications before they start looking for an internship.

Approval

Once an internship is requested by the student in Handshake the approval process begins. A faculty member will view the request in Handshake and either approve or deny the request.

Helpful Articles	URL
How to Kick off the Approval Process on an Experience	https://support.joinhandshake.com/hc/en-us/articles/115015861708
How to Start and Manage Approvals	https://support.joinhandshake.com/hc/en-us/articles/360021202253-NEW-How-to-Start-and-Manage-Approvals
How to Approve an Experience (as a Reviewer)	https://support.joinhandshake.com/hc/en-us/articles/360021010254
How to Approve an Experience (Approver's Point of View)	https://support.joinhandshake.com/hc/en-us/articles/360000613887-How-to-Approve-an-Experience-Approver-s-Point-of-View-

While at Internship

While a student is at their internship, they will have assignments set by their academic department, which typically include learning objectives, student and employer evaluations, and a final report. All departments have a final faculty evaluation and final student evaluation that must be filled out for students to earn credit.

Helpful Articles	URL
How to Manage Evaluations	https://support.joinhandshake.com/hc/en-us/articles/360021259273-NEW-How-to-Manage-Evaluations
How to Request Evaluations on Experiences	https://support.joinhandshake.com/hc/en-us/articles/218693488-How-to-Request-Evaluations-on-Experiences
How to View Evaluations	https://support.joinhandshake.com/hc/en-us/articles/360025173533-NEW-How-to-View-Evaluations

IV. NATIONAL ASSOCIATION OF COLLEGES & EMPLOYERS GUIDELINES

Source: <https://www.naceweb.org/about-us/advocacy/position-statements/position-statement-us-internships/>

POSITION STATEMENT: U.S. INTERNSHIPS

**A DEFINITION AND CRITERIA TO ASSESS OPPORTUNITIES AND DETERMINE THE IMPLICATIONS FOR COMPENSATION
ABSTRACT**

Experiences through which students can apply their academic knowledge in work settings are a vital component of a college education. These experiences are widely labeled as “internships,” but the criteria for and oversight of these experiences vary widely among institutions of higher education and employers in the United States. This paper examines the characteristics of a legitimate internship and the conditions under which such an experience can be engaged on an unpaid basis. At the foundation of this paper is the tenet that an internship is a legitimate learning experience benefitting the student and not simply an operational work experience that just happens to be conducted by a student.

OVERVIEW OF CURRENT PERSPECTIVES FOR EXPERIENTIAL LEARNING EXPERIENCES

Experiential learning is a crucial component of a college education. Experiential learning encompasses a wide variety of enriching opportunities for students, including service-learning, volunteering, student organization leadership and campus involvement, faculty-led research and projects, experiential study-abroad, student employment/work-study, cooperative education, and internships. This position paper concerns itself specifically with internships.

More students are pursuing experiential learning, particularly internships, more colleges and universities are promoting student engagement in experiential learning such as internships, and a greater number and variety of employers are offering these experiences in the form of internships. Significant discussion has developed, particularly around the concept, purpose, structure, and function of internships, and the conditions under which internships can be pursued on an unpaid basis.

In 2010, the National Association of Colleges and Employers (NACE) issued a position statement on unpaid internships that was developed after conducting a national survey of employer and college members and considering other related research. It is framed by principles, beliefs, assumptions, and information that took into consideration the numerous and varying current practices. NACE has developed a framework within which to define the internship experience and identify criteria for determining when internships can be offered ethically and legitimately without pay.

DEFINITION OF “INTERNSHIP” AND CONSISTENT CRITERIA

Because the parties involved in the internship process—students, colleges and universities, and employers—have differing objectives, it is important to have a definition of “internship” upon which all parties can agree. Currently, the term “internship” is used to describe various experiences. Moreover, there are no guidelines by which employers, educators, and students can consistently define “internships.”

To establish uniformity in the use and application of the term “internship,” NACE recommends the following definition:

An internship is a form of experiential learning that integrates knowledge and theory learned in the classroom with practical application and skills development in a professional setting. Internships give students the opportunity to gain valuable applied experience and make connections in professional fields they are considering for career paths; and give employers the opportunity to guide and evaluate talent.

To effectively implement this definition, it is necessary to develop criteria that college career centers and employer recruiters can use to identify workplace experiences that can legitimately

be identified as “internships.” The discussion of these criteria is framed by several conditions. These conditions are the legal definitions set by the Fair Labor Standards Act (FLSA); the widely varying guidelines set by individual educational institutions and academic departments within institutions; employer perspectives on and objectives for internships; and the unique experiential learning objectives of students.

The legal considerations are addressed through six criteria for unpaid interns for the service they provide to “for-profit” private sector employers articulated in the Fair Labor Standards Act (see FLSA Fact Sheet #71). Essentially, if the six criteria are met, the Department of Labor (DOL) considers there to be no employment relationship. The six criteria established by the DOL are:

- The internship, even though it includes actual operation of the employer’s facilities, is similar to training that would be given in a vocational school.
- The internship experience is for the benefit of the student.
- The intern does not displace regular employees, but works under the close observation of a regular employee.
- The employer provides the training and derives no immediate advantage from the activities of the intern. Occasionally, the operations may actually be impeded.
- The intern is not necessarily entitled to a job at the conclusion of the internship.
- The employer and the intern understand that the intern is not entitled to wages for the time in the internship.

In the 2010 NACE survey, both career services and employers agreed with five of the six FLSA criteria; both groups disagreed with the criterion that the employer derives no immediate advantage from the activities of the student.

Students pursue internships because they want to gain professional experience that links their academic coursework to the disciplines they want to pursue for their careers. To gain this experience, students want to engage in projects and tasks that contribute to the professional work of the organization. This means that the employer *does* benefit from the work of the intern while, at the same time, it provides a meaningful experience that allows for the application of academic knowledge.

While the DOL standards are a matter of law, they were originally created for vocational training programs. NACE has recommended to the DOL that it reconsider and revise the FLSA criteria to ensure they “account for the incredible diversity of students, higher education institutions, and employing organizations involved in such programs.” In fact, a recent decision by the 6th Circuit Court in *Solis v. Laurelbrook Sanitarium* addressed the issue of students working unpaid. The case turned on the issue of “primary benefit,” and the court held that students in this case were not “employees” for purposes of the FLSA. The ruling in this case bolsters NACE’s position. It should be noted, however, this case concerned a not-for-profit organization.

To advance this assessment, the ethics must be considered. *At the foundation of such an assessment is the tenet that the internship is a legitimate learning experience benefitting the student and not simply an operational work experience that just happens to be conducted by a student.* The core question then is whether or not work performed by an intern will primarily benefit the employer in a way that does not also advance the education of the student.

CRITERIA FOR AN EXPERIENCE TO BE DEFINED AS AN INTERNSHIP

To ensure that an experience—whether it is a traditional internship or one conducted remotely or virtually—is educational, and thus eligible to be considered a legitimate internship by the NACE definition, all the following criteria must be met:

1. The experience must be an extension of the classroom: a learning experience that provides for applying the knowledge gained in the classroom. It must not be simply to advance the operations of the employer or be the work that a regular employee would routinely perform.
2. The skills or knowledge learned must be transferable to other employment settings.
3. The experience has a defined beginning and end, and a job description with desired qualifications.
4. There are clearly defined learning objectives/goals related to the professional goals of the student's academic coursework.
5. There is supervision by a professional with expertise and educational and/or professional background in the field of the experience.
6. There is routine feedback by the experienced supervisor.
7. There are resources, equipment, and facilities provided by the host employer that support learning objectives/goals.

If these criteria are followed, it is the opinion of NACE that the experience can be considered a legitimate internship.

POSTING UNPAID INTERNSHIPS

Career services professionals should monitor positions posted through their career centers to see that they follow the NACE definition and criteria articulated in this paper. This is particularly important for unpaid internships, as allowing an unpaid internship to be posted implies approval of the internship. Therefore, career centers should not post any unpaid internships that do not meet the seven criteria set forth above.

ACADEMIC CREDIT

While academic credit legitimizes an unpaid experience, in order to be identified as an internship, that experience must fit the criteria. For experiences that employers make available

only if academic credit is awarded, the college or university’s requirements in combination with the criteria laid out in this paper should be used to determine if the experience is a legitimate internship.

CONCLUSION

This paper examines how to assess experiences often promoted to students as “internships” with the goal of determining the implications for compensation by exploring three components:

- The experience’s legitimacy as an internship must be determined. To do so, the educational value of the experience must be considered of most importance.
- Once the experience can be ethically identified as an internship, the implications for compensation can be determined. An experience that meets all the criteria may be offered unpaid.
- Only an experience that meets the criteria presented in this paper should be labeled an internship.

It is the considered opinion of NACE that career services professionals and employment professionals can work collaboratively to ensure that an experience meets and adheres to the criteria so that it can be legitimately considered an internship. In this way, valuable experiential learning can be ethically provided for students.

-July 2011

V. U.S. DEPARTMENT OF LABOR FACT SHEET 71

Source: <https://www.dol.gov/whd/regs/compliance/whdfs71.htm>

U.S. Department of Labor Wage and Hour Division

Fact Sheet #71: Internship Programs under the Fair Labor Standards Act

This fact sheet provides general information to help determine whether interns and students working for “for-profit” employers are entitled to minimum wages and overtime pay under the Fair Labor Standards Act (FLSA).¹

Background

The FLSA requires “for-profit” employers to pay employees for their work. Interns and students, however, may not be “employees” under the FLSA—in which case the FLSA does not require compensation for their work.

The Test for Unpaid Interns and Students

Courts have used the “primary beneficiary test” to determine whether an intern or student is, in fact, an employee under the FLSA.² In short, this test allows courts to examine the “economic reality” of the intern-employer relationship to determine which party is the “primary beneficiary” of the relationship. Courts have identified the following seven factors as part of the test:

1. The extent to which the intern and the employer clearly understand that there is no expectation of compensation. Any promise of compensation, express or implied, suggests that the intern is an employee—and vice versa.
2. The extent to which the internship provides training that would be similar to that which would be given in an educational environment, including the clinical and other hands-on training provided by educational institutions.
3. The extent to which the internship is tied to the intern’s formal education program by integrated coursework or the receipt of academic credit.
4. The extent to which the internship accommodates the intern’s academic commitments by corresponding to the academic calendar.
5. The extent to which the internship’s duration is limited to the period in which the internship provides the intern with beneficial learning.
6. The extent to which the intern’s work complements, rather than displaces, the work of paid employees while providing significant educational benefits to the intern.
7. The extent to which the intern and the employer understand that the internship is conducted without entitlement to a paid job at the conclusion of the internship.

Courts have described the “primary beneficiary test” as a flexible test, and no single factor is determinative. Accordingly, whether an intern or student is an employee under the FLSA necessarily depends on the unique circumstances of each case. If analysis of these circumstances reveals that an intern or student is actually an employee, then he or she is entitled to both minimum wage and overtime pay under the FLSA. On the other hand, if the analysis confirms that the intern or student is not an employee, then he or she is not entitled to either minimum wage or overtime pay under the FLSA.

Where to Obtain Additional Information

This publication is for general information and is not a regulation. For additional information, visit our Wage and Hour Division Website:

<http://www.wagehour.dol.gov> and/or call our toll-free information and helpline, available 8 a.m. to 5 p.m. in your time zone, 1-866-4USWAGE (1-866-487-9243).

1 The FLSA exempts certain people who volunteer to perform services for a state or local government agency or who volunteer for humanitarian purposes for non-profit food banks. WHD also recognizes an exception for individuals who volunteer their time, freely and without anticipation of compensation, for religious, charitable, civic, or humanitarian purposes to non-profit organizations. Unpaid internships for public sector and non-profit charitable organizations, where the intern volunteers without expectation of compensation, are generally permissible.

2 E.g., *Benjamin v. B & H Educ., Inc.*, --- F.3d ---, 2017 WL 6460087, at *4-5 (9th Cir. Dec. 19, 2017); *Glatt v. Fox Searchlight Pictures, Inc.*, 811 F.3d 528, 536-37 (2d Cir. 2016); *Schumann v. Collier Anesthesia, P.A.*, 803 F.3d 1199, 1211-12 (11th Cir. 2015); see also *Walling v. Portland Terminal Co.*, 330 U.S. 148, 152-53 (1947); *Solis v. Laurelbrook Sanitarium & Sch., Inc.*, 642 F.3d 518, 529 (6th Cir. 2011).

VI. EMPLOYER GUIDELINES

- A. Internships must have an internship description and they must be posted in UNT’s Handshake system
- B. Internships must be supervised
- C. Employers are asked to review (not create) the student’s learning objectives for the internship
- D. Employers submit at least one intern evaluation online (through Handshake) during the semester
- E. Employers are asked to review the student’s final paper, if it is a requirement of the student’s internship program
- F. Employers should be aware of the minimum number of work hours that students need to complete to obtain academic credit for the internship

VII. HOW TO POST AN INTERNSHIP

- A. The job and internship posting system UNT utilizes is Handshake. We welcome and encourage employers to post your opportunities with us! Please find below the detailed instructions for the internship process at UNT including how to post, guidelines/regulations, and internship recruitment.

Internship Postings-Handshake

This is the link that employers will use to sign up with us: <https://www.joinhandshake.com/recruiters/>

- B. Once there, this link will guide employers through the registration process: <https://support.joinhandshake.com/hc/en-us/articles/115004897268-The-Employer-Onboarding-Process>
- C. Instructions begin with #1 after this statement, “The following process displays the steps a new employer user goes through upon registering.”
- D. This link is also a good resource to use should further questions arise: <https://support.joinhandshake.com/hc/en-us/categories/202707307-Employer>
- E. A Career Center member will approve or disapprove your internship posting. Should it be approved, it will then be open to our UNT students for viewing and potential applications. Employers’ internship opportunities must follow the regulations and guidelines UNT is required to adhere to relevant to approving/offering internships.

VIII. INTERNSHIP MARKETING & RECRUITMENT UNT

The following options listed are ways to get involved with our students, however, we are open to discuss new ideas of reaching and connecting with our students.

- A. Student Facing: tabling at your choice of various UNT Colleges (ie: College of Liberal Arts and Sciences, College of Business, College of Engineering, College of Visual Arts and Design, etc), present in front of a student organization(s). Should you have interest in connecting with a student organization, please notify our Career Center office at (940) 565-2105 to receive the specific contact information.
- B. Technology and Social Media avenues: Twitter Chats-live streaming career development discussion and student questions with one of our featured employer partners.
- C. Join our Employer Partnership program-various levels available and offered, and can be tailored to your specific wants/needs. Additional information can be provided should you have interest.
- D. Post your internships and jobs on Handshake with UNT.

IX. FACULTY BEST PRACTICES

- A. Faculty should review the student’s Experience Request in Handshake and evaluate the appropriateness of the work experience to the student’s academic program
- B. Faculty should review the student’s Learning Objectives early in the semester and provide feedback and guidance for students
- C. Faculty should have ongoing contact with interns (at least monthly but preferably bi-weekly)
- D. Faculty should, when possible visit the student in their workplace and learn more about what the student’s role and responsibilities are
- E. Faculty should be available to discuss any challenges or problems that students may encounter during the internship
- F. Faculty should work closely with the staff member in the Career Center to facilitate an efficient internship process and also utilize the staff member as a resource when issues arise concerning students.
- G. Faculty should require students to report either periodically throughout the semester or create an assignment through which students can better synthesize their experience

X. STUDENT CODE OF CONDUCT

Students must adhere to the University’s code of conduct during the internship

- A. Students’ conduct and performance represents not only themselves but also the University of North Texas. Before, during and after the internship, students are effectively an ambassador for the university and should act accordingly
- B. Students must respect the laws of the state and country where they perform their internship
- C. Students must dress appropriately for their position
- D. Students must complete the internship under the conditions set forward by the employer
- E. Students must hand in all relevant documents on time as required

ADDITIONAL STUDENT RESPONSIBILITIES INCLUDE

- 1. Identification of learning needs and objectives.
- 2. Fulfillment of learning needs and objectives.
- 3. Completion of all educational requirements including submission of workplace hour sheets, papers and meetings with Internship Coordinator on time.
- 4. Completion of work activities in compliance with agency policy and practices. • Identification and effort to solve any problems arising out of inadequacies or misunderstandings in the internship.
- 5. Contribution to the improvement of ways in which the school functions with respect to internship including suggestions made for new placement sites and policy changes.
- 6. Above all behavior that reflects a professional attitude and ethical decision making in the internship setting.

XI. INTERNSHIP REQUIREMENTS

A. Internship Requirements

Before applying for an internship, we encourage students to be prepared to utilize financial aid eligibility if needed for educational related experiences. Please review the following information as it may relate to your upcoming internship request.

1. Students determine if need/would like financial aid assistance. If yes, they will want to review the Financial Aid (FA) website for instructions and detailed information for next steps in this process. The FA link can be found here, <https://financialaid.unt.edu/>
2. Students will need to check their myUNT account to ensure they are in compliance with payment regulations in order to not be dropped from the internship course.

B. International Student Requirements

1. International students are eligible to work off campus in an internship or co-op, as long as they have filed the necessary CPT paperwork and received work authorization. Credit is one component of the process, which is where our office assists. All CPT-related questions should be directed to International Student and Scholar Services.
2. Each semester an international student is working off campus, they must fill out all paperwork (CPT and Request for Credit). Failure to do so can result in a loss of work authorization.