

<b>Policies of the University of North Texas</b>	<b>Chapter 07</b>
<b>07.007 Internships</b>	<b>Student Affairs</b>

**Policy Statement.** The University of North Texas (UNT) recognizes the educational value of paid and unpaid internships, which provide students with practical experiences outside of the traditional classroom and allow students to apply knowledge and skills in a professional setting. The University monitors internships to obtain a clear understanding of each student’s application of their classroom learning to real world experiences.

**Application of Policy.** Faculty, staff, and students.

**Definitions.**

1. **Business Opportunities.** “Business Opportunities” means situations that: (a) require students to make investments or initial cash deposits; (b) involve students purchasing inventory or product for resale; (c) require students to work independently, without direct supervision, on a regular basis; (d) allow students to work in a private residence or non-commercial setting; (e) students are not considered employees; (f) require students to have financial liability for their work or the work of others; or (g) involve other situations that are not clearly an employee-employer relationship.
2. **Employer.** “Employer” means the individual, company, or organization for whom the student intern will perform work. Employer may not be a multi-level marketing firm, staffing/third-party firm, or business opportunity.
3. **Faculty.** “Faculty” means the academic member monitoring internships completed for academic credit. Faculty are responsible for providing supervision of the student intern’s engagement with the employer, determining the number of course credits to be awarded for the internship, assessing the intern’s work and assigning a course grade.
4. **Internship.** “Internship” means 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 may be paid or unpaid, and may or may not be completed for academic credit.
5. **Multi-Level Marketing Firm.** “Multi-Level Marketing Firm” means a company or organization that utilizes a marketing strategy where employee profit is derived from two sources: the direct sales generated by the employee, as well as from the sales of others who were recruited into the organization by the employee.
6. **Student Intern.** “Student Intern” means a UNT student who participates in an internship.

7. **Unit Administrator**. “Unit Administrator” means the department chair, dean, or other individual responsible for reporting known internships to the UNT Career Center at the end of each semester.

**Procedures and Responsibilities.**

**I. Requirements for Internships.**

A. All internships must meet the following criteria:

1. Must afford students the opportunity to gain valuable applied experience and make connections in professional fields they are considering for career paths;
2. Must give employers the opportunity to guide and evaluate talent;
3. Must be an extension of the classroom and/or student intern’s career aspirations;
4. Must be a learning experience that provides for applying the knowledge gained in their classrooms;
5. Must not be simply to advance the operations of the employer or be the work that a regular employee would routinely perform;
6. Shall provide learning skills or knowledge that are transferable to other employment settings;
7. Will have a defined beginning and end;
8. Must have a job description with desired qualifications;
9. Will have clearly defined learning objectives/goals related to the students’ career aspirations;
10. Will be supervised by a professional with expertise, education, and/or a professional background in the field of the experience;
11. Will include routine feedback to the student by the workplace supervisor; and
12. The host employer shall provide resources, equipment, and facilities that support learning objectives/goals.

B. Responsibility for the education of student interns is assigned as follows:

1. When the internship is completed for academic credit, faculty and on-site supervisors share in the responsibility for the education of student interns;
2. When the internship is completed and no academic credit is involved, the on-site supervisor bears the sole responsibility for the education of student interns.

C. Paid student interns are considered employees of the organization at which they work. The employer therefore has the right to develop and direct the student intern’s role and job responsibilities, but must follow all applicable federal and state employment laws and regulations.

D. Unpaid internships must meet the following requirements pursuant to the Fair Labor Standards Act:

1. The unpaid internship provides training that would be similar to training given in an educational environment, including the clinical and other hands-on training provided by UNT;
2. The unpaid internship's duration is limited to the period in which the internship provides the intern with beneficial learning;
3. The student intern's work complements, rather than displaces, the work of paid employees while providing significant educational benefits to the intern;
4. The unpaid internship is tied to the intern's formal education program by integrated coursework or the receipt of academic credit;
5. The unpaid internship accommodates the intern's academic commitments by corresponding to the academic calendar;
6. The employer and student intern understand that the student intern is not entitled to a paid job at the conclusion of the internship; and
7. The employer and student intern clearly understand that there is no expectation of compensation. The employer must not expressly or impliedly promise the student intern any form of compensation for the time spent in the internship.

E. Internships will be made available to UNT students as follows:

1. All internships will be posted on the UNT Career Center's Handshake website; and
2. Faculty referrals for internships will be made in compliance with federal and state laws and policies governing employment referrals, as well as the Family Educational Rights and Privacy Act (FERPA).

**Responsible Party:** Unit Administrators, Career Center Director, and Student Interns

## II. **Reporting/Recording Internships.**

- A. Each Unit Administrator, or designee, must electronically submit an Internship Activity Report to the UNT Career Center at the end of each semester regarding any student within the Unit Administrator's department/division/college who is known to have participated in an internship during the preceding semester. The UNT Career Center will subsequently report aggregate internship activity data for the entire University.
- B. The UNT Career Center will provide regular training for faculty, staff, and student interns on engaging in, reporting, and recording internship activity.

**Responsible Party:** Unit Administrators Faculty, Staff, Career Center Director, Student Interns

## **References and Cross-references.**

National Association of Colleges and Employers (NACE) (2011). U.S. Internships: A definition and criteria to assess opportunities and determine the implications for compensation. Retrieved December 1, 2016 at <http://www.nacweb.org/advocacy/position-statements/united-states-internships.aspx>.

U.S. Department of Labor Wage and Hour Division (Updated January 2018). Fact Sheet #71: Internship Programs Under The Fair Labor Standards Act. [www.dol.gov/whd/regs/compliance/whdfs71.htm](http://www.dol.gov/whd/regs/compliance/whdfs71.htm).

*Iatt 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).

### **Forms and Tools.**

Approved: 10/21/81

Effective:

Revised: 8/94; 8/98\*; 3/02; 5/06; 5/11\*\*; 1/20

\* Reviewed with no changes

\*\*Format Only