

Guidelines for UNCW Internships

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

UNCW has a rich history of students participating in internships- both for credit and not-for-credit, paid and unpaid. Our current efforts at establishing “Applied Learning” as the theme for our QEP (Quality Enhancement Plan) for our SACS accreditation further emphasizes internships as one of the approaches for students to participate in applied learning activities. In addition, our new University Studies includes “Explorations Beyond the Classroom” as part of UNCW’s core curriculum.

Definition of “Internship”

To establish uniformity in the use and application of the term “internship,” UNCW has approved the following definition:

An internship is a form of experiential learning that integrates knowledge and theory learned in the classroom with practical application and skill development in a professional setting. Students may earn academic credit from a degree-granting, educational institution. This work/learning arrangement for academic credit is overseen by a faculty member designated from the academic department within the student’s declared major. The work/learning experience is usually the length of a semester, may be part-time or full-time, paid or unpaid. A learning agenda in the form of specific learning objectives is established prior to the start of the internship. The internship also may include one or more forms of reflection integral to the experience to distinguish it from a volunteer position or job.

Should a student choose not to earn academic credit for the internship experience, then the student should work with his or her Site Supervisor to assure appropriate learning goals are established and met upon completion of the internship experience.

[Approved by UNCW Provost & Vice Chancellor for Academic Affairs, Fall 2016]

To effectively implement this definition, it is necessary to develop criteria that UNCW students, faculty, staff, employer recruiters, and the Career Center 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) from the U.S. Department of Labor (DOL) and subsequent court decisions; the varying guidelines set by individual academic departments; employer perspectives on and objectives for internships; and the unique applied learning objectives of students.

The legal considerations are addressed by the U.S. Department of Labor through six criteria for unpaid internships articulated in the Fair Labor Standards Act (see FLSA Fact Sheet #71) and subsequent court cases. The six criteria established by the DOL are:

- Internship, even though it includes actual operation of the facilities of the employer, is similar to training which would be given in an educational environment;
- Internship experience is for the benefit of the intern;
- Intern does not displace regular employees, but works under close supervision of existing staff;
- Employer that provides the training derives no immediate advantage from the activities of the intern; and on occasion its operations may actually be impeded;
- Intern is not necessarily entitled to a job at the conclusion of the internship; **AND**
- Employer and intern understand that the intern is not entitled to wages for the time spent in the internship.

A recent federal court decision further refined the test for legal unpaid internships with these statements:

- Understanding that there is no expectation of compensation.
- Training similar to that given in an educational environment, including clinical and hands-on training provided by educational institutions.
- The extent to which the internship is tied to the intern’s formal education program by integrated coursework or receipt of academic credit.
- Accommodates intern’s academic commitments by corresponding to academic calendar.
- Duration limited to period in which internship provides beneficial learning.
- Intern’s work complements, rather than displaces, work of paid employees while providing significant educational benefit to intern.
- Understanding that there is no entitlement to a paid job at conclusion of internship.

The main point of this “Primary Benefit” position is that while an employer always will gain some benefit from the work of an intern, the intern must gain the primary benefit of skill development, education/training and relevant experience.

To avoid potential liability under federal law, the Career Center strongly suggests that for-profit organizations pay their interns at least the current minimum wage as part-time or temporary employees. To support the federal regulations and our UNCW students, the UNCW Career Center does not post or promote unpaid internships with for-profit organizations. With appropriate learning content and outcomes, unpaid internships with not-for-profit and governmental organizations can be posted, as per federal law.

Standards for an Experience to Be Defined as an Internship

To ensure that an experience— whether it is a traditional on-site internship or one conducted remotely or virtually— is educational, and thus eligible to be considered a legitimate internship by the UNCW definition, all of 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. Prior to the beginning of the internship there are clearly defined learning objectives/goals related to the professional goals of the student's academic coursework and/or career plans. At the end of the internship, there is an established process for reflection on the learning objectives established earlier.
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.

Academic Credit

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 document should be used to determine if the experience is a legitimate internship. Be aware that the decision to award academic credit for an internship is made between students and their academic departments. Academic credit does not replace compensation for work performed during an internship.

Academic credit for an internship requires registration for the appropriate 498 course in the student's major and the payment of associated tuition and fees for the course. See the "Internship Coordinators by Department" document on the Career Center website for information about requirements for internships for credit by individual academic departments.

<http://uncw.edu/career/internships.html>

A non-credit Certified Internship Program (CIP) is available to students through the UNCW Career Center. This provides a structured format for students to reflect on their experiences throughout their internship by completing five online modules. Completion of the CIP also fulfills UNCW's requirement for at least one "Explorations Beyond the Classroom" on the transcript. See more information about the CIP at this link: <http://uncw.edu/career/cip.html>

Conclusion

This document examines how to assess experiences 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 of the criteria may be offered unpaid within non-profit and governmental organizations.
- Only an experience that meets the criteria presented in this paper should be labeled as an internship.

Sources for this document include the National Association of Colleges & Employers (NACE), the National Society for Experiential Education (NSEE), the Cooperative Education Association (CEA), and the U.S. Department of Labor (DOL).