

INTERNSHIP POLICIES, PROCEDURES, AND GUIDELINES MANUAL (2023/24)

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This document was developed and approved by the 2016-17 Internship Committee:

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EXECUTIVE SUMMARY

Mission: This manual fulfills the Internship Committee's charge from the UT Faculty Senate to bring consistency across departments by establishing general guidelines and baseline standards for the approval, registration, and supervision of internships along with relevant tasks, duties, responsibilities, learning objectives, and work hours required to earn academic credit (Faculty Handbook, pp. 2-21, 2-22).

History: After ten years of development and deliberation, the Faculty Senate approved the first version of this manual in Spring of 2016. Going forward, and in line with the University's QEP of Learning by Doing: Inquiry-based Experiential Education, the current version of this manual is designed to help improve and expand internship experiences for students, faculty, and host sites while preserving important legal and ethical principles of transparency, equal opportunity, and institutional continuity.

Definition: Internships integrate classroom learning with practical skill development in a real world setting. They are primarily educational and must provide more benefit to the student than the host site. They should relate to the student's major and accommodate academic commitments. Unpaid internships should complement, rather than displace, paid employees. Internships can be any combination of paid, unpaid, credit-bearing, and non-credit-bearing.

Baseline Requirements for Credit-Bearing Internships:

- 1. Internship Request Form (IRF) completion by host site and approval by academic department
- 2. 40 hours per semester per academic credit hour (individual department's ratios may be higher)
- 3. Registration within first 3 weeks of the semester (except late adds and second 7 weeks terms)* Retroactive credit is not permitted
- 4. Minimum duration of 7 weeks for Fall and Spring semesters and 6 weeks for Summer
- 5. Junior-standing, 2.0 overall GPA, and all pre-requisites from supervising academic department
- 6. Student and Host Site evaluations of learning objectives/outcomes plus a student reflection paper

*If adding an internship will push a student over 18 credits, the student will need to 1) remove a course from their current schedule by either dropping before the end of Drop/Add or 2) petition Academic Advising for a credit overload. (Please note that students will still be charged tuition for any classes dropped after the end of Drop/Add.) Students must be enrolled in the internship course during the semester in which the internship is being completed. Retroactive credit is not permitted.

FAQs

Q: Can established internship host sites avoid the IRF paperwork by getting "grandfathered in?"

A: No. Every host site needs to have an IRF on file since this form contains important liability waivers and establishes institutional continuity within UT's database of internships. Furthermore, it is not an onerous task; the IRF takes about 20 minutes to complete online and only needs to be done once per unique internship opportunity.

Q: Can I pre-screen students and send only my best to internship host sites?

A: No. Such a practice, while tempting in its expediency and convenience, violates legal and ethical standards of transparency and equal opportunity. Internships, just like any job, should be made openly available to any qualified candidates who wish to apply.

Q: Can I preserve internship opportunities for my own students?

A: Yes. You can add specific UT course pre-requisites and/or GPA minimum qualifications to the job description. To find out more, please contact the Office of Career Services (hireut@ut.edu).

Q: Are there any exemptions to the Internship Manual?

A: Yes. This manual does not apply to some national and international internship programs along with experiences governed by external accrediting entities in Education, Nursing, and Athletic Training.

INTRODUCTION

According to the National Association of Colleges and Employers (NACE), nearly two thirds of graduating seniors completed at least one internship. The University of Tampa is committed to helping its students compete nationally by providing experiential learning activities across the curriculum to ensure that students balance 'learning by thinking' with 'learning by doing.' Students participate in learning partnerships with faculty and the community through internships, practica, behavioral simulations, performances and exhibitions, research activities and service learning.

In 2015, The University of Tampa formally approved its Quality Enhancement Plan with a key focus on inquiry based internship and research opportunities. One of the established program goals is to transform the institution by engaging more students in quality internship experiences through changes in curricular requirements, strengthening the rigor of internship outcomes and improving relations with community partners.

Most academic disciplines have internship opportunities for eligible students. Each student is encouraged to plan how an internship experience best fits into their overall course of study. Eligibility criteria vary by college and discipline, so students are advised to plan ahead as far as possible. A meaningful internship can allow students to:

- Test out possible careers
- Develop personal strengths
- Build a stronger resume with related industry experience
- Apply concepts learned in the classroom
- Earn academic credit
- Identify and develop relevant transferable skills
- Network with professional contacts
- Gain leadership skills
- Earn compensation

INTERNSHIP APPROVAL PROCEDURE

- 1. Initial contact is typically made with a potential Internship Host Site through the following methods:
 - Employer request
 - Career Services outreach/ Handshake
 - UT faculty/staff outreach
 - Employer partner referral
 - Student outreach
- 2. After initial contact, students can verify their eligibility to earn credit for an internship through career services or their Faculty Internship Coordinator.
- 3. The potential internship host site is sent the Internship Request Form (IRF) via email or Handshake* by Career Services staff, faculty members, or other UT stakeholders. (Appendix A)

^{*}Handshake is the University's internship, job, and employer database managed by the Office of Career Services.

- 4. Potential host site submits the Internship Request Form (IRF) to the Career Services designated contact via Handshake or email depending on which format the academic department is using.
- 5. Career Services designated contact verifies that the IRF is complete in its entirety then sends the IRF to the appropriate Faculty Internship Coordinator for academic credit approval.*
- 6. Once approved, the student is notified by the Office of Career Services (or their Faculty Internship Coordinator if preferred by the academic department) and the IRF is archived. The Handshake database will serve as the centralized management system of internship opportunities and contacts for The University of Tampa.
- * Not all internships posted on the Handshake database will be for academic credit. Students must follow-up with their major department's Faculty Internship Coordinator or Career Services to determine eligibility for academic credit on a case-by-case basis.

International Internships:

Students should consult with the <u>International Programs Office</u> and Career Services prior to applying for international internships for academic credit. For more details, see the International Considerations section of this manual and: www.ut.edu/international/services/emploment/curricular/

GUIDELINES FOR CREDIT

The University of Tampa organizes the coordination of internships through a partnership between the Office of Career Services and individual academic departments. This manual establishes a common baseline of minimum requirements and standards for internships, which can be enhanced by each department as needed. Some experiences, such as student teaching, practicum, and some clinical experiences, have requirements set by the academic departments and/or accrediting entities and are therefore not required to comply with this manual. These include, but are not limited to, Education, Nursing, and Athletic Training. Education majors are required to complete multiple internships in their required coursework. More specific details outlining these internships can be found in the Department of Education Clinical Education Handbook.

FOR-CREDIT INTERNSHIPS

Minimum Requirements and Standards:

- Minimum duration of seven weeks in Fall and Spring Semesters (six weeks in Summer).
- Good academic standing (defined as maintaining an overall GPA of 2.0).
- Junior class standing (exceptions require Department Chair and Internship Coordinator approval).
- Approval by academic department and course registration up to three weeks into the academic semester. (Retroactive credit is not permitted.)
- Pre-requisites and academic requirements established by the supervising academic department.
- An evaluation of the Internship Host Site completed by the student.
- An evaluation of the student completed by the site supervisor.
- A minimum of one student reflection paper evaluating the internship experience.
- A minimum of 40 hours of work over the course of the semester for each academic credit. (This minimum may be higher depending on department requirements).

Students cannot earn internship credit for a current job they are employed at. This is a violation of the Fair Labor Standards Act. Internships must be experiential learning experiences that have approved learning objectives as any other course offered at the university.

ROLES AND RESPONSIBILITIES

Faculty Internship Coordinator

Faculty Internship Coordinators recruit potential Host Sites and helps students to align career goals with internship opportunities. They also set and implement department specific guidelines and expectations by:

- Evaluating and approving/not approving potential internships for academic credit (See Appendix A)
- Setting grading policies for student work
- Reviewing internships to assure quality
- Recommending appropriate internships to students
- Training Faculty Internship Supervisors
- Identify substitute internship experience if student is unable to complete internship due to no fault of their own
 - O Students who are unable to complete the internship due to no fault of their own (e.g. sexual harassment, injury, etc.) should discuss their options with the internship coordinator. The coordinator will work with the student to find a substitute internship experience, provide activities to fulfill the internship requirements, or give a grade of "incomplete" and allow the student to complete the internship in the following semester. The decision will be based on the availability of alternative internships, the nature of the incomplete, and the discretion of the advisor. Alternative arrangements could include:
 - Students could work with the relevant department on campus. Business students
 could work with accelerator or incubator company in the Lowth Center,
 accounting students could work in the accounting department, public health
 students could work with LiveWell UT, tech students could work for computer
 labs or ITS, etc. All relevant parties must be in agreement on the alternative
 arrangement.
- The following Title IX language is to be included in the internship course syllabus (approved by UT HR Nov. 2019)

The University of Tampa is committed to providing a work and educational environment that is free from unlawful harassment and discrimination. The University maintains a strict policy prohibiting any kind of harassment or discrimination on the basis of sex, race, color, religion, national origin, disability, gender identity or expression, sexual orientation, age, military or veteran status, marital status, genetic information or any other protected characteristic.

If you have concerns related to any of these behaviors at your internship location, please contact the Title IX Coordinator at (813) 257-3748. Should you choose to file a formal report, The Title IX Coordinator will work with you and the appropriate University officials to remedy this important matter and to assist you with meeting the requirements needed to fulfill your academic credit.

Faculty Internship Supervisor

Faculty Internship Supervisors conduct the internship course by:

- Working with Faculty Internship Coordinator to maintain department guidelines
- Preparing and assisting students with internship search
- Monitoring learning objectives and outcomes
- Evaluating and grading students
- Assessing student evaluations of Internship Host Sites

- Assessing Host Site evaluations of students
- Assessing reflection papers from students evaluating their internship experiences

Student

- Chooses internship and completes application process within first three weeks of the semester (Retroactive credit is not permitted. Students must be concurrently enrolled in the internship course and completing the internship.)
- Abides by the rules and regulations of the internship Host Site and UT's Code of Conduct
- Selects desired academic credit hours and makes room in class schedule or requests credit overload
- Works with Host Site to establish a schedule, learning objectives, and evaluation methods
- Submits evaluation of Internship Host Site
- Submits reflection paper evaluating overall internship experience

Host Site

- Determines the pay (if applicable) and duration of the internship experience
- Completes the Internship Request Form (see Appendix A) and submits it to Career Services
- Verifies and maintains compliance with the Fair Labor Standards Act (FLSA)
- Provides Liability Insurance coverage for the intern*
- Provides a physical working space for the intern
- Provides educational activities such as orientation, training sessions, work projects/activities, meetings within the organization (staff, team, department, board), shadowing other staff, position rotations, site visits to other organizations, professional meetings, conferences, and workshops

Host Site Supervisor

- Works with student to establish a schedule, learning objectives, and evaluation methods
- Assigns student responsibility for a range of interesting and challenging tasks
- Teaches student transferable skills that can be applied in other contexts
- Provides student with oversight and consistent feedback oriented towards learning objectives
- Completes and submits any student evaluations required for academic credit

Office of Career Services

- Serves as liaison between potential internship Host Sites and the University
- Works with academic departments in a consulting capacity
- Serves as Ex- Officio member of Internship Committee
- Manages internship search strategies and prep services to assist students with internship success
- Conducts individual and group internship information appointments
- Manages internships/Experiences on Handshake
- Provides students with internship search resources including Handshake, GoinGlobal, etc.
- Offers students guidance through the internship credit approval process based on their individual department/major

^{*} In the rare case when liability insurance is unavailable from the Host Site, student may complete a Release of Liability & Hold Harmless Agreement waiver (see Appendix B).

CAREER SERVICES RESOURCES

Handshake Database

A superior web-based career management system where internships can be posted and searched by students. The system manages both active postings as well as archived opportunities previously posted and approved. Student can additionally access national and international internship opportunities via integrated resources on Handshake and GoinGlobal. The online internship credit approval workflow is managed on Handshake (for academic departments that wish to use this "Experiences" platform for approval).

Individual Coaching

Students may make individual consultation appointments with a career coach.

Internship Fair

Employers from various industries come to campus to recruit UT students for their internship opportunities. This event is held once per semester. Organizations attending bi-annual Internship Fairs must have a minimum of one pre-approved internship for credit managed by career services in compliance with UT's Internship Program.

Internship Prep Workshop

A workshop providing an overview of the preparation and processes involved in applying for an internship, including the steps for applying and securing academic credit. Presented once per semester.

Recruitment of Organization and Potential Host Sites

The Office of Career Services will work in collaboration with key stakeholders to continually develop and maintain a diverse representation of quality Host Sites for the University of Tampa and its students. This will be accomplished via referrals, participation in community activities, and additional opportunities as necessary.

Reports on UT Internship Program

Provide a bi-annual and annual report on internship data as related to the QEP.

GRADUATE STUDENT INTERNSHIPS

Graduate students wishing to gain practical experience may do so by participating in a maximum of two graduate internships. Students should meet with their Graduate Programs Advisor to obtain information regarding eligibility and requirements. Only approved internships may be completed for academic credit. The employer must submit an Internship Request Form supplied by the Office of Career Services. Business Graduate Students wishing to pursue academic credit while participating in an internship must enroll in their 690 internship course. (Retroactive internship credit is not permitted.) Credits will count toward the fulfillment of the Practicum requirement in the MBA curriculum and normal graduate tuition fees apply. All internship paperwork must be finalized prior to the start of the semester in which they will take place. Graduate students outside the College of Business seeking to complete an internship for academic credit should contact their academic department for internship course enrollment details.

LEARNING OUTCOMES ASSESSMENTS

Internships provide an excellent opportunity for evaluating student learning outcomes. Key goals of the internship process include the application of classroom lessons to the "real world" and preparation for a career in the student's chosen field of study. As previously discussed, employers often seek out student graduates with internship experiences demonstrating student understanding of lessons learned and applied for success. Departments wishing to evaluate student learning outcomes start with identification of desired goals and objectives. These desired outcomes are identified and monitored by the student's Site Supervisor, an experienced industry professional. Through evaluations (both from the student intern and the Host Site Supervisor), learning outcomes can be evaluated. In addition, students may be required to reflect on the most valuable lessons learned during their internship. The results of these assessments may suggest enhancements to the department's program of study.

HOST SITE AND UNIVERSITY PARTNERSHIP

From their initial contact, the Faculty Internship Coordinator, Site Supervisor and Faculty Supervisor should work together to prioritize learning outcomes and develop a meaningful opportunity for the student. Thus, everyone should seek the following minimum standards:

- Orientation to establish rights, responsibilities, and safety
- Regular and productive contact between student and Site Supervisor
- Consistent hours of work with clear assignments
- Ongoing evaluation of student's work and learning objectives
- Designated professional work space

The department's Faculty Internship Coordinator and The University of Tampa keep records as necessary on each company and its supervisors of student interns. Such records will benefit future students considering their options at that company. Example of records maintained by the university could include the Internship Request Form (IRF), historical evaluations from previous interns, journal entries or other documents shared by internship Host Site.

INTERNATIONAL CONSIDERATIONS

Internships in the USA for International Students:

International students considering participating in paid or unpaid_internships must check with the International Programs Office prior to acceptance of a position to determine their eligibility and must complete all paperwork required by U.S. Citizenship and Immigration Services (USCIS). It is a requirement that all international students completing an internship in the USA register the experience for academic credit and complete related Curricular Practical Training (CPT) paperwork. There are no exceptions due to recent updates in U.S. immigration policy.

Curricular Practical Training (CPT) Overview:

CPT is an internship/employment option available to internationals students (F-1 visa) to gain practical experience in their field of study and the student must receive academic credit for the training. This employment may be an internship, cooperative education job, a practicum, or any other pre-approved work experience.

Preconditions to Participate in CPT

Students must...

- have been lawfully enrolled on a full-time basis for at least one academic year prior to joining the internship. Exceptions exist only when academic programs mandate early internship participation.
- have an internship offer that is related to his/her major field of study and earns academic credit(s) for the training.
- participate in CPT internships only for the specific employer, location, and period approved and recorded on his/her SEVIS I-20 by the Primary/Designated School Official (P/DSO) from the International Programs Office.
- be authorized to participate in CPT internships for no more than 20 hours/week (part-time) during Fall and Spring semesters or no more than 40 hours/week (full-time) during summer.
- continue to maintain a full-time course load of study during the period of employment during Fall and Spring semesters.
- receive written authorization from the P/DSO and have it recorded in SEVIS before internship/employment starts.
- meet the departmental academic internship criteria.

CPT request process:

To request CPT, students should submit the CPT request and required documents into the online TerraDotta system (TDS) for international students, including the following:

- Complete the CPT workshop, statement of understanding, questionnaire, and quiz in TerraDotta
- Request and received an electronic Internship Coordinator/Advisor Recommendation in TerraDotta endorsing course information and major relevance
- Proof of enrollment for academic credit (paid or unpaid)
- Letter from employer with job title, description, dates of employment, and work hours per week and employer's name, address, and a phone number.

CPT approval process:

The P/DSO from The International Programs Office will confirm that all eligibility requirements are met and will enter the employment authorization in the students' SEVIS record indicating the employer's name, location, hours, and dates of employment. An updated SEVIS Form I-20 will be printed, signed and dated by the P/DSO and returned to the students prior to the beginning of employment.

IMPORTANT: Students can only work during the employment dates authorized on the SEVIS Form I-20. Working outside of those specific dates will constitute illegal employment (see Appendices F1 and F2).

Internships Abroad:

The International Programs Office advises students on education abroad opportunities, including international internships and internships in Puerto Rico and other U.S. territories. Prior to any international travel, students are required to seek approval by the International Programs Office for credit and non-credit-bearing international internships. Students should contact the International Programs Office prior to March 1 for international internships taking place the following summer and fall, and October 1 for international internships taking place the following spring. Students participating in international internships should have a minimum 2.5 GPA and be in good conduct standing for university approval. GPA requirements for specific internship courses are often higher than 2.5 and therefore will supersede the International Programs Office's minimum requirements.

The International Programs Office registers and tracks students abroad for safety and risk management; therefore students participating in an international internships are required to follow all University of Tampa policies and procedures for international travel, including, but not limited to, enrollment in international health insurance, attendance at a pre-departure session, and completion of health and liability forms.

The risks and considerations associated with traveling to various international destinations vary depending on the destination, activity and traveler(s) involved. The International Programs Office monitors country travel warnings, advisories and/or public announcements set forth by the U.S. Department of State (and other agencies, e.g. The World Health Organization and the U.S. Centers for Disease Control and Prevention). If a travel warning is in effect during the planning phase or for the date of intended travel, the internship cannot be approved. Additionally, trip cancellation can occur prior to, or during the internship period if there is found to be substantial risk to the traveler.

INTERNSHIP GRIEVANCE POLICY/PROCESS

The University of Tampa is committed to engaging students in professional and safe working/learning environments. We encourage students to become familiar with any misconduct, confidentiality, and sexual harassment policies associated with the Host Site and to follow them. Students are urged to report any misconduct or sexual harassment incident against them (including physical, safety, and personnel) as soon as possible to their University of Tampa internship coordinator to permit both the University and the Host Site the opportunity to promptly intervene. (Reference: Student Rights and Responsibilities)

Steps for students filing a Statement of Grievance:

- Fill out a Statement of Internship Grievance form available from Career Services (see Appendix C)
- File the form (either in person, or online as an email attachment) with Career Services
- Follow through on all suggested interventions

Possible faculty interventions could include:

- Providing guidance, if necessary, to the student on how to address the Host Site
- Contacting The University of Tampa legal resources for assistance in facilitating the intervention(s)
- Contacting the student and Site Supervisor to establish a formal meeting to present the allegations
- Removing the intern from his/her internship site if necessary. The Faculty Internship Coordinator will determine the most effective resolution regarding any academic credit impact on student
- Referring to The University of Tampa conduct office if it is deemed that the student may have violated any Spartan Code of Conduct policies

Procedure: Once notified of internship issue, Career Services will take the following steps:

- The employer/student account in Handshake will be deactivated
- An email to the complainant will be sent explaining the Internship Grievance Policy and requesting completion of the Statement of Internship Grievance
- Faculty will be notified if the internship is credit-bearing
- All interactions during the intervention will be documented and kept on file in the Office of Career Services and proceed according to University policy

GLOSSARY OF TERMS

Office of Career Services: A Career Services staff member is dedicated to supporting and implementing the internship program. This person serves as the central point of contact for organizations wishing to post or create an internship opportunity. Additional responsibilities include facilitating Internship Prep Workshops, meeting with students, and consulting with academic departments regarding internships.

Experiential Education: Learning that blends and integrates classroom knowledge with practice.

Faculty Internship Coordinator: The department or college designee who evaluates and approves internships for academic credit based on departmental criteria. This person often administers the internship class for the department or academic program.

Faculty Internship Supervisor: Faculty member responsible for evaluating student work and site supervisor feedback to determine a for-credit internship grade. The experience being supervised must be pre-approved for academic credit by the faculty member's department (typically through the chair).

Fieldwork: Activities performed outside the classroom, library, studio, or laboratory for University credit and under the supervision of an instructor.

For-credit Internship: A focused short-term work experience related to the student's major or career goal under the guidance of at least one practicing professional and at least one UT faculty member.

Internship: An integration of classroom learning with practical skill development in a real world setting. Internships are primarily educational and must provide more benefit to the student than the host site. They should relate to the student's major, accommodate the student's academic commitments by corresponding to the academic calendar, and complement, rather than displace, the work of paid employees. Internships can be paid, unpaid, credit-bearing, non-credit-bearing, and any combination thereof.

Internship Host Site: The organization, business, or entity that offers an organized hands-on educational experience for a student intern

Non-credit Internship: A work experience related to the student's major or career goal under the supervision of at least one practicing professional in the workplace.

Practicum: An academic course that combines classroom activities with supervised practical application.

Service Learning: An academic course that links academic training with provision of services to a community constituency.

Site Supervisor: The practicing professional designated to provide direct, in-person supervision to the intern while s/he is at the internship host site.

Undergraduate Research: An experiential education activity in which a student conducts research under the guidance and supervision of a faculty mentor. Students may earn credit, based upon meeting eligibility criteria.

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APPENDIX A

Internship Request Form (IRF)

The University of Tampa Office of Career Services Internship Request Form

401 W. Kennedy Blvd, Tampa, FL 33606 813/253-6236, <u>www.ut.edu/career</u>

To complete this form, place your cursor in the first shaded box and type the information. You may then tab from box to box. Please complete all information, save it and attach it to an email addressed to mbutters@ut.edu.

COMPANY INFORMATION

Company Name		Contact Name	
Address	City	State	Zip
This address is a commercially zoned	, established workplace?	(Not a home office) Choose all th	at apply.
Yes, this is a commercially zoned, No, this is not a commercially zone This is a home office.	•	e.	
Phone	Email	Company websi	te
Company has liability insurance that Yes No **See Liability Insurance details at end		ring internship? (required to host	: a UT intern)
INTERNSHIP INFORMATION			
Internship Title	Have you eve	er hired a University of Tampa ir	ntern? 🗌 Yes 🔲 No
Internship/Site Supervisor Name an	nd Title		
Internship location			
Internship Description (Please use a	as much space as neede	d, more thorough descriptions will	yield more candidates)
Learning Opportunities/ Obj	jectives (This information	n will determine acceptance for cre	edit)
 Duties, Qualifications, and F 	Projects (no more than 2	20% of work should be clerical in n	ature)
Are there any known or fore	eseeable risks to studer	nts? 🗌 Yes 🔲 No	15
10 1			

If yes, please state the specific risks:

Status (select all that apply): ☐ Summer only ☐ Fall only ☐ Spring only ☐ Entire academic year
☐ Part-time ☐ Full-time
Compensation: ☐ Paid. If so, amount: \$ ☐ Unpaid*
This internship complies with the Fair Labor Standards Act ☐ Yes ☐ No
*Please note that when using unpaid interns, certain guidelines must be followed to conform to the Fair Labor Standards Act. This act applies to most employers, government, non-profit, and for-profit. Please see the <u>Department of Labor website</u> , the attached document on FLSA, and consult your legal adviser if you have questions on these issues.
Student Status (select all that apply): ☐ Freshman ☐ Sophomore ☐ Junior ☐ Senior ☐ Graduate Student
Majors: All or, if specific majors required, list them:
Is there a GPA requirement? If yes, select minimum:
The University of Tampa is committed to providing a work and educational environment that is free from unlawful harassment and discrimination. The University maintains policies prohibiting any kind of harassment or discrimination on the basis of sex, race, color, religion, national origin, disability, gender identity or expression, sexual orientation, age, military or veteran status, marital status, genetic information or any other protected characteristic. For UT's Title IX Compliance and Sexual Misconduct procedures please review this link: https://www.ut.edu/studentconduct/titleix/
☐ I understand the statement above
"The University of Tampa is committed to equal employment opportunity for all persons regardless of race, color, religion, sex, age, national origin, citizenship status (as defined under the Immigration Reform and Control Act), disability, or marital status, sexual orientation or veteran's status. The University of Tampa is also committed to provide all of its programs and activities to its students and alumni on a nondiscriminatory basis.
Equal employment opportunity extends to all aspects of the employment relationship including hiring, recruiting, interviewing, selection, transfer,

The **University of Tampa** expects that any employer or third-party organization representing an employer that uses its facilities, including but not limited to the career services office, for the purpose of recruiting full-time, part-time, and temporary employees or interns and cooperative education students, complies with federal and state equal employment opportunity laws in its recruiting and hiring. The **University of Tampa**

strive to eliminate all forms of harassment, including sexual harassment in their recruiting, hiring, and selection process."

** Liability Insurance

also expects that employers, third-party organizations, and their representatives

INDEMNITY: (COMPANY) shall defend, indemnify and hold harmless The University of Tampa (UNIVERSITY) and all of UNIVERSITY's officers, agents, and employees from and against all claims, liability, loss and expense, including reasonable costs, collection expenses, attorneys' fees, and court costs which may arise, in whole or in part, because of the negligence (whether active or passive), misconduct, or other fault, (whether joint, concurrent, or contributing), of COMPANY, its officers, agents or employees in performance or non-performance of its obligations under the Agreement. COMPANY recognizes the broad nature of this indemnification and hold harmless clause, as well as the provision of a legal defense to UNIVERSITY when necessary, and voluntarily makes this covenant and expressly acknowledges the receipt of such good and valuable consideration provided by UNIVERSITY in support of these indemnification, legal defense and hold harmless contractual obligations in accordance with the laws of the State of Florida. This clause shall survive the termination of this Agreement. Compliance with any insurance requirements required elsewhere within this Agreement shall not relieve

COMPANY of its liability and obligation to defend, hold harmless and indemnify UNIVERSITY as set forth in this article of the Agreement.

Insurance. (COMPANY) shall, at its sole cost and expense, procure and maintain throughout the term of this agreement, Comprehensive General liability insurance, or self-insurance as approved by the Florida Office of Insurance Regulation, including Employer Liability insurance, with minimum policy limits of \$1,000,000 per occurrence, \$1,000,000 aggregate, or to the extent and in such amounts as authorized and required by Florida Statute section 768.28 (5), whichever is greater, as well as Worker's Compensation insurance for the minimum statutory amounts and will provide endorsed certificates of insurance generated and executed by a licensed insurance broker, brokerage or similar licensed insurance professional evidencing such coverage. Certificates of insurance and certified copies of the insurance policy must accompany this signed contract. Said insurance coverages procured by COMPANY as required herein, including but not limited to any excess and/or umbrella coverages, shall be considered, and COMPANY agrees that said insurance coverages it procures as required herein shall be considered, as primary insurance over and above any other insurance, or self-insurance, available to UNIVERSITY, and that any other insurance, or self-insurance available to UNIVERSITY shall be considered secondary to, or in excess of, the insurance coverage(s) procured by COMPANY as required herein. Certificates of Insurance and the insurance policy require the endorsement "The School and its employees, officers and agents are additional insureds on the above listed insurance policies, excepting professional liability and workers' compensation policy." The certificate holder should state "The University of Tampa, 401 W Kennedy Blvd, Tampa, FL 33606.

By initialing here, I certify all information is true and correct to the best of my knowledge.

APPENDIX B

Release of Liability & Hold Harmless Agreement

The University of TAMPA

401 W. Kennedy Blvd. Tampa, FL 33606-1490 • (813) 253-3333

Release of Liability & Hold Harmless Agreement

Whereas, I understand and acknowledge that I have chosen to participate in an off-campus, credit-bearing internship for [TITLE OF INTERNSHIP COURSE]; and

Whereas, I wish to participate in the internship with **[NAME OF COMPANY]** as arranged as a for-credit internship by The University of Tampa and **[ACADEMIC DEPARTMENT]**,

Whereas, I understand and recognize that there exists the possibility and risk of bodily injury to me or damage to my property while traveling to and from or participating in the internship; and

Whereas, I report that to my knowledge I am appropriately fit and capable to participate in the program;

Now, Therefore, for and in consideration of The University of Tampa allowing me to participate in this program as a for-credit internship, I hereby release, relieve, and hold harmless The University of Tampa, its trustees, officers, employees, contractors, agents and representatives from any liability or claim of liability, including liability for bodily injury or property damage arising out of or in connection with my participation in the internship; including travel to, from and around the location. I hereby release those parties from any and all claims, including those claims arising from their own negligence or the negligence of any one of them. I have read the above release and I understand and agree to the terms.

In consideration of permitting me to participate in the below listed event(s), I will indemnify and hold The University of Tampa, Inc., its employees, contractors, agents and representatives harmless from any claims,

contractors, agents or representatives, during or arising out of my participation in the event(s) listed below.: By signing below, I acknowledge that I have read this Release of Liability and Hold Harmless Agreement, and am signing it voluntarily. Signature Print Name Student ID # Date In Case of an Emergency contact: Phone #: Relationship: If I am under the age of 21, I understand that I need a parental consent to my participation in the internship to this Release of Liability and Hold Harmless Agreement. I hereby give my consent to the participation by _ __in the internship and I agree to the terms of this Release of Liability and Hold Harmless Agreement. Signature of Parent Print Name of Parent

Date

losses, damages, expenditures, liabilities or charges of any kind or nature, whether arising or alleged to have

arisen out of any act, action, neglect, or omission by The University of Tampa Inc., its employees,

APPENDIX C

Statement of Internship Grievance

Information About You			
Your Name (First and Last)			
Student ID Number			
Phone Number			
Email Address			
Major			
Is this a for-credit Internship?	Yes	No	
Faculty Internship Coordinator			
Information About Your Internsh	ip		
Organization/Company Name			
Street Address			
Supervisor's Name (First & Last)			
Supervisor's Phone Number			
Supervisor's Email Address			
Duration of Internship	Start date:		End date:
Description of Grievance			
Date of Incident			
Location of Incident			

Describe your Grievance in Deta	ail:		
Have you Discussed your Cond Supervisor or Someone Else at		liate Yes	No
If Yes, What is the Status of the	e Grievance?		
Your Signature*(*If sending this document via en	mail, your typed name w	Date ill serve as a signatu	nre)
For Administrative Use Only:	Interventions		
Intervention			
Taken by			
Date			
Description of Intervention			
Subsequent Intervention (if no	eeded)		
Intervention			
Taken by			
Date			
Description of Intervention			
Career Services Conclusion			
Final Conclusion			
Was conclusion discussed with student?	Yes No	Comments	:
Did student approve conclusion?	Yes No	Comments	:
Date			
Has this form been filed with career services?	Yes No		

APPENDIX D1

Sample Form – Employer Evaluation of Intern

Student: _		Interni	s Name		
		intern :	s Name		
Internship Dates:			Total Number of Hours Worked:		d:
_	Begin Date	End Date	rotarivan	mber of mould worke	
Evaluated by:					
_		Superviso			
Position: _		Phone:	Area	Phone Number	Fxt
			Code	, none name	
Company: _					- 10
Address:				Email:	
City: _		State:	<u></u>	Zip:	
Evaluators					
Signature _				Date:	
	PI	ease return the completed Dr. Maureen But			
		Accounting Internship Co			
		John H. Sykes College of The University of Ta			
		401 W. Kennedy Blvd Tampa, FL 33606-1			
			.450		
		Or email to mbutler@ut.ed	<u>u</u>		
	*T	his evaluation is used to de	termine the let	ter	

EMPLOYER'S EVALUATION FORM (PART 2)

The University of Tampa Objectives: We are committed to developing liberally educated individuals who have an integrated understanding of business principles and knowledge of a specific area of competency. It is our objective to produce business graduates with the competencies and perspectives noted below, which we believe are necessary for effective leadership.

How are we doing with respect to these objectives? You recently had a professional one-on-one relationship with one of our students. Please reflect on the specific student and, using the numbered scale below, respond to each item that you observed. The student demonstrated:

1	2	3	4	5
	Little or Some			K
No Extent	Extent	Moderate Extent	Significant Extent	Great Extent

	 (a) critical thinking skills, including the ability to solve problems and make strategic and tactical decisions (e.g., handled unstructured problems, knew where to search for data)
	(b) effective speaking and writing skills (e.g., could speak well before others, wrote clearly)
	(c) well-developed interpersonal skills with strong sense of teamwork, leadership and individual responsibility (e.g., took initiative, recognized need to resolve conflict)
-	(d) well-developed value system that can be responsibly applied (e.g., supported ethics, fair customer treatment, fair labor practices, efforts to reduce discrimination and pollution)
, (T)	 (e) understanding of American business enterprise in a competitive, global economy (e.g., current on national and international issues, could relate these to workplace)
<u> </u>	_ (f) ability to apply broad business theories to real-world situations using computer technology as appropriate (e.g., understood workplace economic events and why they occurred)
-	 (g) appreciation and preparation for life-long learning (e.g., read professional journals/newspapers, inquired about professional organizations)
·	(h) specific competencies in functional area of business (e.g., appeared interested in and knowledgeable about his/her major). Please circle competency: accounting, computer information systems, economics, finance, international business, management, marketing.
W	nich areas are in greatest need of improvement? Please circle letters before each competency.

THANK YOU FOR PARTICPATING IN THE UNIVERSITY OF TAMPA INTERNSHIP PROGRAM

APPENDIX D2

Sample Form – Site Supervisor Evaluation of Intern

Intern Name_				
Evaluation Per	riod from	to		
Internship Hos	st Site			
Phone				
Email				
Please evalua	ate your intern using	a scale of 0 to 4 as our	tlined below:	
	N/A= not appli	cable		
	1= Disagree stro			
	2= Disagree son	newhat		
	3= Agree somev	vhat		
	4= Agree strong	ly		
1 Th. :		4	.i 4 i	
N/A	vas aepenaavie in reiaiion 1	to completing projects and be	eing on time 3	4
11/11	1	2	3	7
2. The intern b	ehaved in an appropriate	and professional manner		
N/A	1	2	3	4
3. The intern re	eached or exceeded their le	arning objectives		
N/A	1	2	3	4
4.0 11.1	, 1 1 1, 1, 1	,		
	as very pleased with the in	tern 2	2	4
N/A	1	Δ	3	4
Please answe	er the following ques	tions:		
5. Was this eva	aluation reviewed with	the student? Yes N	То	
6. What are th	is intern's most signifi	cant strengths?		

7. What constructive feedback would you provide to help the intern grow professionally?

APPENDIX D3

Sample Form – Intern Evaluation of Host Site

Name				
Major				
# of credits				
1				
Internship end	date			
Internship Hos	t Site			
Site supervisor				
Please evalua	te your Internship F	Iost Site and Supervis	or using a scale of 0 to	o 4 as outlined below:
	N/A= not applie 1= Disagree stro 2= Disagree son 3= Agree somew 4= Agree strong	ongly newhat vhat		
1. The amount N/A	and quality of supervision 1	was helpful 2	3	4
2. This experies N/A	nce gave me a realistic pres 1	view of my field 2	3	4
3 The work I	did was challenging and st	imulating		
N/A	ua was trautenging ana si 1	2	3	4
4. I feel I am be N/A	tter prepared to enter the w 1	ork world after this internshi 2	<i>i</i> p 3	4
Please answer	r the following ques	tions:		
			during your internship.	
6. Would you	recommend your inte	rnship site to other stud	lents? Why or why not?	

APPENDIX E

Sample Internship Guide for COM & AD/PR Majors

Credits and Requirements:

Communication (COM) majors and Advertising and PR (AD/PR) majors can participate in internships for credit (COM 354 Internship) or non-credit. If you choose noncredit, you can see Career Services for instructions and do not need a faculty member's supervision or the instructions below. If you choose to do an internship for credit, you must have junior or senior standing (at least 60 hours completed at time of registration) and a minimum 3.0 GPA in your major. The next step is to determine the number of academic credit hours you would like to earn. Credits are typically determined by a minimum number of weekly work hours: 1 credit = 4 hrs/week, 2 credits = 8 hrs/week, 3 credits = 12 hrs/week, and 4 credits = 16 hrs/week. Also note that you must have room in your schedule in order to add an internship. For instance, if adding the internship would push your total credits over 18, you will either need to drop a class before the end of add/drop or contact Academic Advising for a credit overload before registering for the internship.

Restrictions & Supervision:

Internships cannot be used to fulfill 300-or-above level requirements. COM majors and AD/PR majors with General or Public Relations Concentrations can count up to 4 internship credit hours toward the major and any additional internship credit hours toward general electives. AD/PR majors with the Advertising Creative Concentration can only count internship credit hours towards general electives. You will need a full-time faculty member to agree to supervise your internship for credit. Prof. Christopher Boulton is the Internship Coordinator for COM and AD/PR majors, but other COM faculty may also agree to supervise internships upon request.

Fair Labor Standards for Unpaid Internships:

An unpaid internship should be an educational experience that benefits the intern more than the host site. This is why the United States <u>Department of Labor</u> requires host sites to assign unpaid interns a range of interesting and challenging tasks, teach them transferable skills that can be applied in other contexts, and provide them with oversight and feedback oriented towards learning objectives. If this is not taking place a your internship, talk with your Faculty Internship Coordinator because your host site may need to either pay you for your work or increase the educational value of the experience. More information available at https://www.dol.gov/whd/regs/compliance/whdfs71.htm

WHAT TO DO BEFORE YOUR INTERNSHIP:

1) Research internships already approved by UT or find your own.

Start by reading over Career Services' very helpful Student Internship Guide (you can access it here: http://cboulton.weebly.com/uploads/8/6/4/9/86496516/student_internship_guide.pdf). Next steps would be searching HIRE-UT on SpartanNet, scheduling a 15 minute drop-in appointment with Career Services, contacting Kelly Allgeier, Assistant Director of Internship Programs, and/or asking faculty members in your major. You might also employ your personal/professional network of contacts to approach a potential internship site on your own. If a site expresses interest, or even offers you an internship, you will need them to fill out an online Internship Request Form (available at http://www.ut.edu/career/employerservices/internshiprequest) in order for the internship to be considered, and hopefully approved. If the internship host site has questions about this, please refer them to Career Services' equally helpful Employer Internship Guide.

2) If necessary, apply for the internship.

The host site will determine the criteria of what is required for the application, but a cover letter and CV (resume) are typical along with the occasional request for a work sample. In order to give yourself the best possible chance of getting hired for the internship, I recommend that you customize both your cover letter and CV for the host site and specific duties of the internship. In other words, try to emphasize which aspects of your own experience, talents, and interests align most closely with the host site. At this stage you will also need to establish how many hours you intend to work per week.

3) Determine your work hours and number of credits.

Most internships are taken for either 2 or 4 credits. A typical 2-credit internship would require a minimum of 8 hours per week while a typical 4-credit internship would require a minimum of 16 hours per week. The choice of how many credits to register for is entirely up to you. However, do keep in mind that some internships have minimum work hour requirements. Thus, while the number of work hours should correspond with the number of credits that you register for at UT, do make sure that your work hours can also meet your host site's expectations.

4) Complete a UT Internship Agreement with a sponsoring faculty supervisor.

Once you are hired for the internship, you will need to download an Internship Agreement form (http://cboulton.weebly.com/uploads/8/6/4/9/86496516/boulton internship agreement.pdf) and then fill it out by entering your information into the empty cells of the PDF (note: Course Prefix & Number is COM 354). Then save the file to your own computer as YOURLASTNAME_internship_agreement.pdf, add all of your information, then save it again and email the PDF file to cboulton@ut.edu (or another faculty supervisor) so I can sign it and send it along to the Registrar for processing. Your internship should then show up as part of your class schedule on your SpartanNet account within a few days. [Note: You must have space in your schedule in order for the registration to go through. If you already have 16 credits, you might consider a 2 credit internship so you don't have to petition for an overload (more than 18 credits). Also keep in mind that registration must be completed within the first three weeks of the semester. Failing this, you will not be registered for the internship and will not receive credit for completing it.] To

WHAT TO DO DURING AND AFTER YOUR INTERNSHIP:

5) Establish a schedule, learning objectives and evaluation methods.

On the first day of your internship, find out who will be supervising or managing you. Then request a time to sit down with them to establish your weekly work schedule and sketch out a set of specific learning objectives that you hope to accomplish over the course of the internship. Finally, do your best to set up a reliable mechanism of evaluation, preferably in the form of monthly feedback from your internship host site supervisor. This is important because in order to accomplish your learning objectives you will need a continuing process of on-site evaluation to help you succeed and reach that goal.

6) Fill out online Internship Intake Form within first two weeks of your internship.

After you get settled in, go online to fill out the <u>Internship Intake Form</u> so that everyone (including you, your host site supervisor, and your faculty supervisor) can be on the same page about the educational aspects (such as learning objectives and evaluation methods) of your internship. Make sure that your host site supervisor is aware that they are responsible for providing a final evaluation/assessment that is not simply based on your general performance but rather should be specifically oriented towards addressing your learning objectives.

7) Show up, be on time, work hard, and stick to it.

An internship is an exercise in pre-professional training. Therefore, you will be expected to exhibit a professional attitude and work ethic throughout the experience. Plan to always be on time and complete your work assignments as expected. Remember, you are not just representing yourself; you are also representing UT. Therefore, withdrawal from an internship is strongly discouraged. Not only will it reflect poorly on you and the University of Tampa, but it will also jeopardize your classmates' chances of securing a future internship with that host site. If, despite all this, you still wish to withdraw from your internship, you must first notify and seek permission from your faculty supervisor. Failing to do so will result in an "Unsatisfactory" grade for that particular internship course and make you ineligible for any future internships through the University of Tampa. If any conflicts or problems arise during your internship, it is your responsibility to inform your faculty supervisor in a timely manner so that the situation might be remedied as soon as possible.

8) Submit a Mid-term Report to your faculty supervisor.

Halfway through your internship (no earlier than six weeks in and no later than 8 weeks in) you will need to email your faculty supervisor a 1-2 page Mid-term Report of your internship experience thus far. This report should provide specific examples and address the following five areas: 1) the company's founding, mission statement, product, clients/customers, and number of employees and departments 2) your internship duties/responsibilities and the kinds of projects are you working on and people you are working with 3) any skills or insights gained relevant to your learning objectives and major and/or career goals 4) problems or challenges you've had and what you've done to solve them 5) the amount and quality of supervision, feedback, and evaluation you are getting from your host site supervisor.

9) Submit a Final Report to your faculty supervisor.

At the end of your internship or during the last week of the semester (whichever comes first), you will need to write up and email your faculty supervisor a 3-5 page reflection on your experience that provides an overall evaluation of your host site as well as a demonstration of what you learned using specific examples. Therefore, I would strongly recommend that you keep an ongoing journal throughout your internship so you will have plenty of material at-the-ready when it comes time to write. In your Final Report, be sure to answer the following ten questions: 1) what were your major accomplishments in terms of projects completed and/or goals reached? 2) which of your learning objectives did you achieve and how? 3) what were the biggest challenges you faced and how did you overcome them? 4) which aspects of your academic preparation (particular classes, professors, student organizations, etc.) were most helpful during your internship? 5) how might the University of Tampa better prepare students to be successful interns? 6) what did your host site teach you (equipment/software, teamwork, specialized vocabulary, etc) that you didn't already know? 7) what are the most valuable lessons that you will take away from this internship? 8) how has this internship helped prepare you to enter the work world? 9) Would you recommend your internship site to other UT students? Why or why not? And, finally, 10) do you think this particular internship could be improved for next time? If so, what changes would you recommend?

GRADING POLICIES

Taking an internship for credit is like taking a class. The only difference is that the work takes place off-campus and the grading is pass/fail ("Satisfactory" or "Unsatisfactory"). In other words, yes, you can fail an internship. If you have any questions or concerns regarding the grading policies of your internship course, please consult this guide carefully (along with the linked resources) and contact your faculty supervisor.

REPORT GUIDELINES

Both reports should include a title page with your name, academic semester, and the name and address of the company along with the name and contact information of your host site supervisor. The report should be typed, double-spaced, numbered, and have been carefully edited for spelling, grammar, syntax, etc. Email your reports to your faculty supervisor.

CALCULATING YOUR FINAL GRADE

At the end of the semester, based on your Mid-Term Report (20%), Final Report (40%), and your internship host site supervisor's evaluation (40%), your faculty supervisor will submit a grade for your internship of either "Satisfactory" or "Unsatisfactory." Please note that a grade of "Incomplete" will be given if these documents are not received by the grading deadlines noted above. In this case, it is up to you to make an alternative arrangement with your faculty supervisor. Otherwise, all "Incomplete" grades will automatically become "Unsatisfactory grades" on a date determined by the Registrar.

This guide is also available online at: http://cboulton.weebly.com/interns.html

APPENDIX F1

Employer's Guide to Hiring International Students

International students attending school in the United States under an F-1 visa **cannot** be employed off campus without proper authorization. They must be in proper status and obtain approval from an International Student Advisor/DSO (Designated School Official) at their institution, or an authorization from the Department of Homeland Security for certain types of employment. The following is a brief explanation of Curricular Practical Training (CPT) and what constitutes proper work authorization under CPT. No Employment Authorization Document (EAD card) is required for this type of Curricular Practical Training, but the student must obtain a Social Security Number.

CURRICULAR PRACTICAL TRAINING

Curricular Practical Training (CPT) is employment that is an integral part of an established curriculum, such as an internship, cooperative education, or work/study. According to immigration F-1 regulations, the student must have maintained status for one academic year before they can participate in any internship. CPT is not designed to be a means of off-campus employment, but rather as a curricular requirement. Therefore, internships must be registered as academic credits, be in the major field of study, and be supervised by a faculty member/internship coordinator. Students may only work/internship a total of 20 hours per week (part -time) when school is in session. If the CPT is authorized as "part-time," the student may not exceed 20 hours of work per week. Students may exceed the 20 hours per week only during authorized vacation periods (or when the employment is a requirement of the academic program) and specified on student's SEVIS I-20.

DOCUMENTS REQUIRED FOR AUTHORIZATION:

(To be submitted to an International Student Advisor-DSO)

- Student should provide the International Programs office an internship/job offer letter from the employer. The letter must be on company letterhead and indicate the job title, beginning and ending dates, work hours per week, and brief description of job duties.
- Proof of class registration.

EMPLOYMENT ELIGIBILITY VERIFICATION

- The employer should ask to have a copy of the student's SEVIS I-20 with the work authorization printed on page 3.
- When the student begins work, the I-9 Verification Form must be completed and retained by the employer.
- The student is authorized to work only during the period listed on the I-20. Employer should check and follow the start and end dates closely. Students **cannot** in any circumstances **begin employment before or continue employment after those dates.**

SOCIAL SECURITY AND OTHER TAXES

In general, F-1 students who have been in the United States fewer than five years are exempt from Social Security taxes if they are not "residents for tax purposes." However, earnings are subject to applicable federal, state and local taxes. Students must file a tax return on or before April 15 each year, so the student should furnish the employer an address to send the W-2 form if planning to leave the U.S. or change the place of residence by the end of the tax year.

APPENDIX F2

F-1 Employment Regulations Reminders

IMPORTANT: If an F-1 student does not follow the terms of the non-immigrant visa status as stated in the regulations, the F-1 student's SEVIS record will be terminated. After termination of a student's SEVIS record, the student must depart the country immediately.

There are limited employment opportunities available in the United States for an F-1 student. For this reason, before being admitted to the United States, students must have documentary evidence that they have the financial ability (e.g., present bank statements) to pay for tuition and living expenses while studying in the United States. The U.S. government takes illegal employment very seriously, so it is important to reiterate this message:

- Students should consult with their DSO **BEFORE** starting on-campus employment
- Students must obtain DSO authorization on the Form I-20 BEFORE starting Curricular Practical Training (CPT)
- Students must obtain a DSO recommendation on their Form I -20 and U.S. Citizenship AND Immigration Services (USCIS) authorization (Form I-766, "Employment Authorization Document," (EAD)) BEFORE starting any other employment

DSO means "Designated School Official". These officials are responsible for enforcing the F-1 student visa regulations compliance. Usually, they are also the International Student Advisors at the university.

If a student with authorized employment (on campus) does not have a Social Security Number (SSN), the DSO should provide the student with a letter verifying the approved employment, enabling them to obtain one. Every F-1 student who becomes employed in the United States needs an SSN.

The following employment opportunities are available to eligible F-1 students:

On-Campus Employment

While it does not require authorization in SEVIS, DSOs should ensure an F-1 student is eligible for on-campus employment (i.e., confirm that the student is maintaining non-immigrant status, is not a border commuter and that the employment meets the regulatory criteria for on-campus employment). Keep in mind, an F-1 student may only be employed 20 hours per week with on-campus employment when school is in session.

Off-Campus Employment

An F-1 student is eligible for off-campus employment only after they have been in F-1 status for one full academic year at a Student and Exchange Visitor Program (SEVP)-certified school. Off-campus employment is available only for a student experiencing severe economic hardship caused by unforeseen circumstances beyond the student's control.

Practical Training

An F-1 student may also be eligible for practical training directly related to their studies if they have been lawfully enrolled on a full-time basis in an SEVP-certified college, university, conservatory or seminary for one full academic year. A student may be authorized 12 months of practicum training. CPT must be integral to the student's program of study.

Appendix G

Best Practices

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PRELIMINARY CONSIDERATIONS

Faculty at major universities have a variety of demands placed upon them. There are advising meetings with students, departmental meetings, faculty senate meetings, committee work, assessment projects, preparation for labs and lectures, field trips, community service, oversight of student organizations, and the list could go on. Above all else, faculty want to make sure students are learning. No one wants their work to be in vain. Everyone wants students to "get it".

Helping students to "get it", however, does not always allow faculty to walk a smooth, level road. There are challenges, and there are multiple avenues to address those challenges. The focus of this manual is on internships (work integrated learning, or learning from doing in off campus contexts) and practical tools to assist you and keep you from re- inventing the proverbial wheel.

Regardless of the academic discipline, internship faculty advisors have a common objective: to develop assignments that will facilitate learning, and the assessment and evaluation of learning, occurring in an internship experience. Well thought out academic assignments will elicit responses demonstrating the quality of the learning experience at the site.

The College Learning for the New Global Century, a report from the National Leadership Council for Liberal Education & America's Promise and published by the Association of American Colleges and Universities, postulates four primary categories of Essential Learning Outcomes. They are 1) Knowledge of Human Cultures, the Physical and Natural World, 2) Intellectual and Practical Skills, 3) Personal and Social Responsibility, and 4) Integrative Learning. It is in this fourth category, which includes synthesis and advanced accomplishment across general and specialized studies, that we find a direct tie- in to internships. This outcome should be demonstrated through "the application of knowledge, skills, and responsibilities to new settings and complex problems."

"To apply knowledge productively in field- based settings, all students should experience in- depth questioning from faculty, staff, and other mentors about their assumptions, analyses, conclusions, and actions. Learners also need both guidance and feedback, from mentors and peers, as they probe the facets of a complex issue and test their own insights against both theory and the experiences of others. And to prepare for the world's diversity, all students need frequent opportunities to engage in collaborative interaction with people whose assumptions and life experiences are different from their own." – p. 36- 37

Another document, which offers excellent guidance and provides national standards for experiential education, is provided through the National Society for Experiential Education. The membership of this professional association includes faculty, administrators, and internship coordinators, among others, from the United States and several other countries. The following document – Standards of Practice: Eight Principles of Good Practice for All Experiential Learning Activities – is the result of widespread collaboration and input from hundreds of professionals. It is the guidepost, the benchmark, by which we need to measure what we do in our internship program. The italicized remarks after each point are not part of the original document, but are added for further clarity and to provide practical ideas for implementation of concepts.

STANDARDS OF PRACTICE: Eight Principles for All Experiential Learning Activities

Regardless of the experiential learning activity, both the experience and the learning are fundamental. In the learning process and in the relationship between the learner and any facilitator(s) of learning, there is a mutual responsibility. All parties are empowered to achieve the following principles. Yet, at the same time, the facilitator(s) of learning are expected to take the lead in ensuring both the quality of the learning experience and of the work produced, and in supporting the learner to use the principles, which underlie the pedagogy of experiential education.

- 1. **Intention:** All parties must be clear from the outset why experience is the chosen approach to the learning that is to take place and to the knowledge that will be demonstrated, applied or result from it. Intention represents the purposefulness that enables experience to become knowledge and, as such, is deeper than the goals, objectives, and activities that define the experience. Assist students to consider the "why" of their proposed or required experience. Help them to understand how workplace experience will benefit them. This can be accomplished in one on one meetings, group discussion, or online presentation.
- 2. **Preparedness and Planning:** Participants must ensure that they enter the experience with sufficient foundation to support a successful experience. They must also focus from the earliest stages of the experience/program on the identified intentions, adhering to them as defined goals, objectives and activities. The resulting plan should include those intentions and be referred to on a regular basis by all parties. At the same time, it should be flexible enough to allow for adaptations as the experience unfolds. Learning objectives should be developed, along with resources used to meet the objectives, and ways in which the accomplishment of the objectives will be evaluated. These will form the basis of a learning contract, which, due to the nature of the experience, will remain dynamic. See tips for development of sound learning objectives later in this manual.
- 3. **Authenticity:** The experience must have a real world context and/or be useful and meaningful in reference to an applied setting or situation. This means that it should be designed in concert with those who will be affected by or use it, or in response to a real situation. The experiential education triangle of the student, the employer, and the university must agree on the objectives and parameters of the experience. The internship should

complement the student's major and better prepare them for the workforce and/or graduate studies.

- 4. **Reflection:** Reflection is the element that transforms simple experience to a learning experience. For knowledge to be discovered and internalized, the learner must test assumptions and hypotheses about the outcomes of decisions and actions taken then weigh the outcomes against past learning and future implications. This reflective process is integral to all phases of experiential learning, from identifying intention and choosing the experience, to considering preconceptions and observing how they change as the experience unfolds. Reflection is also an essential tool for adjusting the experience and measuring outcomes. Reflection can take place in a variety of formats journaling (written or online), work/reflection logs, executive summaries, classroom discussion, one on one meetings with faculty advisors, etc.
- 5. **Orientation and Training:** For the full value of the experience to be accessible to both the learner and the learning facilitator(s), and to any involved organizational partners, it is essential that they be prepared with important background information about each other and about the context and environment in which the experience will operate. Once that baseline of knowledge is addressed, ongoing structured development opportunities should also be included to expand the learner's appreciation of the context and skill requirements of her/his work. Orientation should take place prior to the internship. Students need to understand expectations the university has for them and to think about how to make the most of their experience. Topics such as expectations, professional behavior, time management, and social relationships should be discussed. Employers also need to provide an orientation to the site for when students first arrive.
- 6. Monitoring and Continuous Improvement: Any learning activity will be dynamic and changing, and the parties involved all bear responsibility for ensuring that the experience, as it is in process, continues to provide the richest learning possible, while affirming the learner. It is important that there be a feedback loop related to learning intentions and quality objectives and that the structure of the experience be sufficiently flexible to permit change in response to what that feedback suggests. While reflection provides input for new hypotheses and knowledge based in documented experience, other strategies for observing progress against intentions and objectives should also be in place. Monitoring and continuous improvement represent the formative evaluation tools. Students should be given assignments over the course of the experience, which permit faculty to gain an understanding of the progress being made. A minimum of one site visit should be conducted for each intern. This allows better understanding of the site, the student's workspace, and the quality of supervision. A mid- semester review of learning objectives and general conduct is beneficial for all parties.
- 7. **Assessment and Evaluation:** Outcomes and processes should be systematically documented with regard to initial intentions and quality outcomes. Assessment is a means to develop and refine the specific learning goals and quality objectives identified during the planning stages of the experience, while evaluation provides comprehensive data about the experiential process as a whole and whether it has met the intentions which suggested it. *See the Outcomes and Assessments document of Messiah College below*.
- 8. **Acknowledgment:** Recognition of learning and impact occur throughout the experience by way of the reflective and monitoring processes and through reporting, documentation and sharing of accomplishments. All parties to the experience should be included in the recognition of progress and accomplishment. Culminating documentation and celebration of learning and impact help provide closure and sustainability to the experience. *Acknowledgements could include poster sessions, classroom presentations, portfolio development, joint large group breakfast meeting with employers and students, and web highlights of work experiences.*

INTERNSHIP OUTCOMES AND ASSESSMENTS: MESSIAH COLLEGE

Model Component	Outcome	Strategies	Assessment
Foundational World View	Interns will understand how core beliefs relate to all of life, including their work environment	Reflective Commentaries in Portfolio Class Module(s)	Masterwork Portfolio Interaction in Internship Class
Contextual Learning	Interns will learn what it means to be a self-directed learner through experiential education in authentic settings	Development of Learning Objectives Organizational Analysis Paper Workplace projects Site visits and guidance by IC staff	Pre and Post Internship Self- Assessment Masterwork Portfolio
Awareness of Self	Interns will gain a greater understanding of their abilities and will experience increased self- confidence in their workforce readiness	Workplace projects Transferable Skills Paper Reflection/interaction in the Internship Class Site visits and guidance by IC staff Executive Summary	Pre and Post Internship Self- Assessment Transferable Skills Paper Employer Evaluation Self Evaluation Executive Summary Masterwork Portfolio
Knowledge of the World	Interns will demonstrate improvement in professional skills, competencies and attitudes	Workplace projects Professional Card Professional Etiquette Dinner Employer presentations in Internship Class Executive Summary	Employer Evaluation Executive Summary Masterwork Portfolio
Decision and Action	Interns will assess and clarify their current understanding of themselves, their abilities and the workplace and plan a future course of action	Reflection/interaction in the Internship Class Transferable Skills Paper Executive Summary Individual guidance by IC staff Masterwork Portfolio	Masterwork Portfolio

SYLLABI/ASSIGNMENTS

As you put together the syllabus or academic requirements for the internship, it should include activities and assignments that bring together the theory of the classroom with the internship, and evaluation tools to assess this learning. Because these are educational experiences, site visits, individual meetings, and electronic contact are also strongly encouraged.

Just as other courses, the internship curriculum should require a syllabus or learning contract. The objective is to have the students integrate classroom learning with the learning taking place in the work environment.

Distinctions should be made for different levels of responsibility and for different amounts of academic credit earned. Be sure to clarify expectations for written assignments and grading. Include statements about the weight of each academic assignment and how the employer's performance evaluation of the student's work will be calculated.

Some ideas for academic assignments include:

Blogging/Journaling

- Good method for qualitative assessment over the course of the experience
- Difficult to grade, unless specific parameters are set
- Should not be a log of activities; rather record insights and lessons learned

Short Reports/Papers

- Good for analysis and more defined than journal entries
- Cover topics related to the organization mission, culture, management, communication, etc.

Portfolio

- Good for objective documentation
- Could include samples of work such as newsletters, spreadsheets, graphics, database screen shots, letters of attestation or reference, forms used, etc.

Research Project

- Positive benefits for student and organization
- Geared for upper level students
- Focus on a major issue and include recommendations for a future course of action

Executive Summary

- Succinct snapshot of total experience and feedback on relevance of classroom learning
- Two to three pages in length
- Include paragraphs describing the organization, projects worked on, learning that occurred, future plans, recommendations to academic department

Group Seminars (physical and virtual)

- Good for faculty to communicate ideas to many at one time
- Good for students to see and hear other students facing similar problems as their own

Oral Presentations

• Good for helping students to gather and formulate ideas, and further develop speaking abilities

Evaluation

• Student offers feedback on the supervisor, employer, and how well the student was utilized

LEARNING OBJECTIVE DEVELOPMENT

Learning objectives are a student's strategic plan for what they intend to learn during the internship experience. Learning objectives foster reflection, which leads to deep learning. They form a written agreement negotiated between them, their work site supervisor, and you. A written plan helps them direct, manage and reflect upon the learning process for the internship. Each objective they formulate should have the following three components:

- A.) Learning Objective: What it is that I want to learn?
- B.) Activities/Resources: How am I going to learn it?
- C.) Evaluation/Verification: How am I going to demonstrate what I learned?

SAMPLE LEARNING OBJECTIVES

A. Objective: To learn the stages involved in publishing a magazine – from development of a theme to final production and distribution

Activities/Resources:

- 1. Interview the publisher and managing editor
- 2. Read back issues of the magazines
- 3. Perform research for, and participate in, brainstorming sessions
- 4. Attend staff editorial meetings

Evaluation/Verification:

- 1. Include a narrative in my portfolio explaining key concepts I have learned
- 2. Include work samples (edited copy, story ideas, and/or articles) that demonstrate I understand how the magazine is developed and how I can effectively contribute
- B. Objective: To observe and better understand schizophrenia and the clinical treatment for it

Activities/Resources:

- 1. Observe & interview staff and doctors who are part of a schizophrenic patient's care team
- 2. Observe, firsthand and through charts, patients diagnosed with schizophrenic tendencies
- 3. Find/read three current articles on schizophrenia in academic journals

Evaluation/Verification:

- 1. Include a case study of a client in my portfolio
- 2. Summary of research, with annotated bibliography of resources
- 3. Reflective commentary on how my understanding has increased/changed
- C. Objective: To learn how legislation is researched and written

Resources/Activities:

- 1. Ask co- workers to describe the process
- 2. Examine previous research and final written legislation
- 3. Participate in background research for a potential bill

Evaluation/Verification:

- 1. Reflective summary of research and writing process
- 2. Chart of factors involved in writing legislation
- 3. Section of legislation to which I have contributed

IDEAS FOR RESOURCES AND VERIFICATION

Resources/Activities Options & Ideas

Workplace training, experiences, projects and/or activities:

- Orientation
- Training sessions (internal & external)
- Work projects/activities
- Experiences in other departments within the organization
- Attend meetings within the organization (staff, team, department, board)
- Site visits to other organizations
- Attendance at meetings, conferences, professional organizations
- Shadow or observe other professionals

Reading materials:

- Professional Journals; Literature; Articles
- Discipline- related Literature (textbooks, periodicals, articles, etc.)
- Career resources (books, websites, apps)
- View of Work (current & future trends)

Other "activities/resources" ideas could include:

- Internet resources; literature searches
- Research
- Information interviews with professionals
- Career Development inventories (personality, interests, values, etc.)
- Career Development workshops (resume, interviewing, job-hunting)
- View CDs, DVDs, Streaming Video or Videotapes
- Listen to audio instructional programs
- Journaling/Reflective Writing react in writing to experiences/activities
- Critical Incident Analysis
- Contact professional associations
- Seek professional mentor; develop relationship
- Compare class concepts with workplace experiences
- Discussions with peers
- Discussions with faculty advisor

- Regular meetings with worksite supervisor
- Case study
- Biographies/Autobiography
- Comparative studies
- Look for model/excellent work samples
- Maintain working portfolio
- Attend lectures/presentations

Documentation/Verification Ideas

Artifacts or Work Samples:

Agendas Legislation Audio files Manuals Brochures Newsletters Budgets News stories Case Notes Photos CDs / DVDs **Podcasts** Contracts Posters Press Release Cost analyses

Correspondence **Printouts**

Databases Program Outlines

Demonstrations Proposals

Designs/Artwork Software Presentations

Displays & Exhibits Spreadsheets Documentation Survey Reports

Financial Reports Video

Flyers Webpage Designs

Lab Reports

Attestations:

Articles (about student)

Certificates

Citations & Awards

Commendations

Evaluations

Photos

References

Thank You Notes (sent to student)

Academic and Misc. Samples/Items:

Annotated Bibliography

Career Inventories

Case Study

Journaling (summary of sections – beginning, mid-point and end of experience)

Idea File/Listing

Information Interview

Notes (summary of them)

Presentation Notes

Reading Reviews/Reactions

Reflective Commentary/Essay

Research Paper

Resume

CRITERIA TO EVALUATE QUALITY OF EMPLOYER SITES

Not all sites are appropriate for students. Some employers do not think through all the ramifications of hosting a student, which makes for a less-than-optimum experience. If a site does not know how to go about setting up a quality internship, refer them to the university's Career or Internship Center. As you speak with potential site sponsors, ask a few questions like the ones below. They will provide openings for further discussion on the quality of the experience.

1) Do you provide an orientation for new interns?

If "Yes," what do you cover with them? (Even if it is informal, the student should be provided with basic introductory information about the functioning of the organization and the specific department of which they will be part.)

- 2) Is one person assigned as a primary intern supervisor?
- If "Yes," how is that person selected to be a supervisor? (Try to avoid situations where students have multiple bosses.)
- 3) Do you provide appropriate workspace and resources, such as hardware/software, for the student to accomplish projects you have in mind?
- 4) Do you evaluate your interns?
- If "Yes," how often are evaluations performed, and what topics are covered? (Students need regular feedback, just as they receive while in school.)
- 5) What types of projects are interns involved with? What roles do they have? (Students should not just do filing, answering phones, and other "grunt work". All students do some of that, but they should work on projects where they can apply what they have learned in the classroom.)
- 6) In what ways do you assist interns with networking opportunities? (Lunches, workshops, seminars, conferences, business after-hours events, etc.)
- 7) Do you seek to mentor interns?

If "Yes," please briefly describe how.

8) What other activities, if any, are you involved in which contribute to workforce development through internships?

- 9) Is your site located in a high crime area? (Some sites may be fraught with risk. Knowingly sending a student into a dangerous situation may pose ethical, and potentially legal, difficulties.)
- 10) Is the student work area a safe one? Are there any potential hazards? (e.g., chemical or biological)

VIRTUAL INTERNSHIPS – CHECKLIST FOR SUCCESS

Due to its ubiquity and ease- of- use, technology has opened greater opportunities for virtual internships. They are growing in popularity among employers and students.

Advantages

- 1) No need to relocate
- 2) Often allows for flexible work hours
- 3) Allows for casual dress except for formal presentations
 - (see the chapter on Virtual Meetings in InternQube: Professional Skills for the Workplace)
- 4) Those who are more introverted may gain a greater sense of empowerment through online work

Disadvantages

- 1) Possible lack of quality supervision
- 2) More difficult to understand organizational culture and to make sense of office "politics"
- 3) Difficult if students are not self- starters and need a lot of interaction and instruction
- 4) Students often must use their own hardware and software

To ensure the best possible chance of success use the following checklist as you advise students:

The organization should be an established, legitimate business or non- profit, as evidenced by having –

- o a physical location
- o website
- o history of offering paid employment
- o listed telephone number
- o tax ID number

If the organization consists of a single individual, is that person willing to show you results of their criminal background check?

The organization must agree to offer an experience that meets the criteria of a legitimate internship as outlined by the National Association of Colleges and Employers:

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.

The skills or knowledge learned must be transferable to other employment settings.

The experience has a defined beginning and end, and a job description with desired qualifications.

There are clearly defined learning objectives related to the student's professional goals.

There is supervision by a professional with expertise and educational and/or professional background in the field of the experience.

There is routine feedback by the experienced supervisor.

There are resources, equipment, and facilities provided by the host employer that support learning objectives/goals.

Students and the organization, with approval of the campus internship coordinator, need to agree on a clear, detailed position description, which covers all expectations and constitutes a successful internship.

The organization's internship site mentor must provide you with regular supervision, mentoring, and feedback as outlined above. This will include:

Use of a company intranet or virtual workspace on a server, or an online project management or document- sharing tool, such as Office 365, Google Docs, or a similar program. This will allow the supervisor to go online and monitor the work to be completed. The work is stored in the "cloud," not on a single PC, so it is always available to those who need it.

A regularly scheduled email report in which the student provides information to the internship site mentor and the academic advisor, such as hours worked, challenges or problems encountered, progress toward learning objectives, and any questions they may have.

A weekly virtual meeting on Skype or a similar technology to provide more personalized feedback to the student. Also, faculty can have a virtual site visit by use of similar technology.

If the virtual internship is within a reasonable drive from campus, the employer needs to meet with the student in a public place (e.g., coffee shop, restaurant) at least once a week. This face- to- face meeting is a time for project planning, review of progress made, feedback, and mentoring.

The organization should make the student a part of regular operations as much as possible; for example, including them in face- to- face opportunities such as company meetings or client visits.

The organization must be willing to host a site visit from a representative of the college.

Students should be able to provide faculty advisors or internship coordinators with materials produced during their experience.

ORIENTATION

Another best practice is to provide students with an orientation before they begin their internship. Orientations provide a forum for faculty to instill a mindset for the upcoming experience. These may be conducted in person by means of a workshop, or they may be done through one or more digital methods. Topics which should be included are:

- Expectations of the university, the faculty advisor, and employers in general
- Risk Management potential hazards which may be encountered in an internship
- Professional Behavior what should and should not be done
- Syllabus / Assignments clear requirements with due dates
- Learning Objectives preliminary development
- Site Visit timing and procedure
- Evaluation how and when it will be conducted

SITE VISITS

Site visits by a faculty advisor are strongly recommended. These visits allow advisors to see firsthand the student's workplace, the nature of their tasks, and their performance. Visits also serve as an excellent bridge for faculty and the university within the employment community. When a brand new site is being utilized, it is important to visit at the beginning of the student's internship experience.

Individual site visits generally take no more than a half an hour, although some visits might take longer and become more involved. They are generally conducted sometime after the midpoint of the semester. Faculty should ask to hear details, both from the student and the supervisor, about the assignments on which the student has been working. The assignments should relate to the learning objectives defined at the beginning of the experience. Faculty should review the objectives with both the supervisor and the student to get both sets of perceptions on how well they are being accomplished. If particular challenges have manifested, those should also be addressed.

Every now and again it becomes apparent during a site visit that the intern is not doing the amount of substantive work required for earning credit. The faculty member should use their judgment on how to address this issue. In some cases, it may be appropriate to deal directly with the student and employer during a visit in an effort to generate ideas for more substantive assignments.

Visits provide a way to assess the site for future opportunities, as well as to eliminate those that do not meet professional standards. A follow- up visit by the student to the faculty advisor will allow them to review assignments and evaluations.

Faculty should look at the following areas:

- Level of mutual satisfaction between the students and their supervisors
- Assessment of tasks in which students are involved
- Employer expectations of the student and the University
- Employer awareness of the internship program's academic components

Site visits demonstrate the university's desire to remain connected to the community. This connection goes a long way toward maintaining a positive relationship with the organization. It also allows faculty to become acquainted with practitioners in the field and learn the latest procedures, view/ test the latest hardware or software, and to generally stay abreast of recent developments in a particular industry.

ENDING AN EXPERIENCE

Unfortunately, there are times when an internship experience must be terminated. This may be the result of the employer not holding up their end of the internship agreement, a supervisor who has violated the student in some way, or a student who has acted in some way(s) that calls for the ending of their experience. A sample code of conduct for students follows this section. It is a model for a document you may wish to have students sign.

If proper contact with the student and site has been maintained during the period of time prior to a required action of termination, you should have a good "feel" for the organization and supervisor. Good communication skills are required throughout an internship, but are especially needed during crucial moments when problems develop.

Types of problems are numerous, but two examples should give you an idea of procedure:

Should a student claim sexual harassment by her/his site supervisor, you should tell the student to not report to the site until further notice. Immediately contact the university Social Equity Officer/HR for guidance on the proper procedure to follow. You will need to speak with the student to get their full story. The site will need to be contacted as well. If the organization has a Human Resources office, you should speak directly to the Director. Should you meet with the site supervisor, be sure to have a third party (Director of HR at the organization and/or the Director of the university Career or Internship Center) with you. A sample sexual harassment procedure follows this section.

Sometimes a student will do something forbidden by the organization. This may be something as simple as being told they may surf the internet only during breaks and the lunch hour. The student, however, chooses to do it during the time she/he is supposed to be working. The organization will most likely give the student a warning. If the student persists in the improper behavior, the university should be supportive of whatever discipline the organization imposes on the student, which may include termination. Academic ramifications may also then come into play on campus.

LEGAL ISSUES

Do organizations have to pay interns?

The U.S. Fair Labor Standards Act (FLSA), which applies to all companies that have at least two employees directly engaged in interstate commerce and annual sales of at least \$500,000.00, severely restricts an employer's ability to use unpaid interns or trainees. It does not limit an employer's ability to hire paid interns.

However, an employer does not have to pay interns who qualify as learners/trainees. The U.S. Department of Labor has outlined six criteria for determining trainee status:

- 1) Interns cannot displace regular employees
- 2) Interns are not guaranteed a job at the end of the internship (though employers may decide to hire them at the conclusion of the experience)
- 3) Interns are not entitled to wages during the internship
- 4) Interns must receive training from the organization, even if it somewhat impedes the work
- 5) Interns must get hands- on experience with equipment and processes used in the industry
- 6) Interns' training must primarily benefit them, not the organization.

Latest Legal Update

The United States Court of Appeals for the Second Circuit ruled in summer 2015 regarding compensation for interns. The following is taken from JDSupra Business Advisor - July 3, 2015, authored by Meredith Kurz, Adam Smiley, and Robert Whitman. It is quoted in part.

http://www.jdsupra.com/legalnews/second-circuit-teaches-unpaid-interns-a-85386/

"On the question of employee status, the court declined to defer to the Department of Labor's 6- factor test, holding that it is "too rigid" since it was based on a 68- year old Supreme Court decision involving railroad trainees and was not entitled to special deference. The court also declined to adopt the interns' proposed test, under which employee status would exist whenever the employer receives an "immediate advantage from the interns' work."

Instead, the Second Circuit held that the primary beneficiary test provides a more appropriate framework by focusing on "what the intern receives in exchange for his work" and providing "the flexibility to examine the economic reality as it exists between the intern and the employer."

Rather than using a rigid set of factors to evaluate the internship, the court fashioned a flexible, non-exhaustive set of considerations:

- 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...

At the heart of the decision is the notion that a legitimate internship program must "integrate classroom learning with practical skill development in a real world setting," and that focusing on the academic aspect of an internship program is critical and better reflects the modern workplace. The court also appeared to recognize that for any meaningful internship experience, the intern must do some "work." With this understanding, the court said that interns may perform work so long as it "complements" rather than "displaces" the work of the company's regular employees...

So what does this all mean?

First, the DOL's 6- factor test, at least in the Second Circuit, is no longer valid. As the court said, "[B]ecause the DOL test attempts to fit [the Supreme Court's railroad decision's] particular facts to all workplaces, and because the test is too rigid for our precedent to withstand, we do not find it persuasive, and we will not defer to it."

Second, the decision makes clear that interns may perform some "work" so long as the work does not displace an employee. While no bright line exists, interns may likely be assigned projects that help current employees do their work more effectively. However, the amount of work should be weighed in the context of the entire intern program to ensure that the scale still tips toward the intern being the primary beneficiary of the program.

Third, the educational component of the internship is a critical factor. Companies' programs should emphasize training and educational opportunities, such as speaker series, mock projects, information sessions, open door policies to ask questions about the industry, and attendance at industry conferences or events. The greater the educational component of the program, the more likely that the interns will be the primary beneficiaries."

Workers' and Unemployment Compensation

Workers' compensation boards have found that interns contribute enough to a company to make them employees. It's wise for businesses to cover interns under their workers' compensation policy even though they may not be required to do so. Student interns are generally not eligible for unemployment compensation at the end of the internship.

Income Taxes

The employer is responsible for withholding all deductions required by federal and state income tax laws from the wages of all student- employees. The courts have ruled that compensation for work performed as a student- employee is remuneration for services performed for the benefit of the employer and, therefore, is taxable income. International students on F- 1 and J- 1 visas are subject to withholding payment of federal, state, and local taxes unless they are exempt by provision of a tax treaty. In cases where a tax treaty applies, students must provide documentation to the employer on the appropriate IRS form. Information regarding tax treaties may be found in Internal Revenue Service publications.

Fringe Benefits

The employer may or may not offer a fringe- benefits package to student- employees. Benefits may include as much as full benefits accrued on an equal basis with other employees in similar personnel categories. Many employers provide some vacation and sick- leave benefits. Other benefits such as group life insurance, medical insurance, profit- sharing, and bonuses may or may not be available, depending on company policy.

Keep In Mind

Even if a student is earning college credit for an internship with an organization, the student is still permitted, under the FLSA, to be compensated.

Paid interns make ideal workers - hungry to learn, eager to make a good impression, and willing to perform a multitude of tasks. The relatively small amount of money employers spend on intern wages and benefits is a good investment.

The employer should identify the specific terms and conditions of employment (e.g., the start and end dates of the internship; compensation; organizational and/or reporting relationships; principal duties, tasks or responsibilities; working conditions; confidentiality; and any other expectations of the employer). These should be discussed when recruiting an intern, and also at their orientation, so there is no misunderstanding regarding these matters. Also, it may make good sense to document such a discussion with a written agreement. This should be made in consultation with the educational institution. (See the Appendices)

If an intern is harassed at an organization, and they do not do anything about it, the organization opens itself to the risk of lawsuits. Interns should be advised of appropriate workplace behavior, the organization's harassment policy, and complaint procedures.

Student- employees, including international students, are entitled to full protection of federal antidiscrimination laws. Students are also protected against discrimination in employment by similar state statutes, provided the employer is subject to these laws.

The American with Disabilities Act (ADA)

Student- employees are covered under the Americans with Disabilities Act of 1990. This law protects disabled student- employees from discrimination in employment, hiring, transportation, and covers access to public facilities and services, and telecommunications. Employers are required to provide reasonable accommodation to all qualified student- employees with known disabilities.

Immigration Reform and Control Act of 1986 (IRCA)

All student- employees, regardless of their citizenship status, must abide by IRCA regulations by providing suitable documentation that will enable the employer to comply with this law. Employers are advised about appropriate documentation to establish both the student- employee's identity and authorization to work.

Social Security Tax

Unless exempt under the Social Security law, employers must deduct Social Security taxes from the wages of all student- employees, except those with an F- 1 or J- 1 visa.

International Students

The most common visa types employers will see on college campuses, when recruiting international undergraduate or graduate students for either full-time or internship positions are the F- 1 and J- 1 visas.

- "An F- 1 visa is granted to a person coming to the United States to attend a college, university, seminary, conservatory, academic high school, elementary school, or other academic institution or language training program approved by the U.S. Attorney General for study by foreign students. The visa holder plans to return home after completing studies. This is the most common non- immigrant visa for an international student attending undergraduate and graduate school. Students are granted F- 1 status until the completion of the academic program and 12 months of post- program practical training. The purpose of the F- 1 visa is to provide an opportunity for study in the United States. Anything outside of study, including employment, is an exception to the visa. Authorization for employment is strictly limited to certain situations.
- The student holding F- 1 status for a full academic year and in good academic standing may work off campus. Such work authorization is granted when the student has sustained unforeseen economic hardship. Also, the student may not work for more than 20 hours per week when school is in session, but may work full time during holidays and vacations, including breaks between terms, provided the student intends to register for the next school term.
- Curricular Practical Training: An F- 1 student may perform curricular practical training prior to the completion of the educational program as part of his or her educational experience. The INS defines this type of training as 'alternate work/study, internship, cooperative education, or any other type of required internship or practicum that is offered by sponsoring employers through agreements with the school.'
- Optional Practical Training: This is temporary employment directly related to the student's major area of study that takes place after the student completes a full course of study.

 Authorization for this training may be granted for a maximum of 12 months of full- time or part- time work. Those on a student visa can only gain authorization once for this type of training."

The above information is adapted from the National Association of Colleges and Employers (reprinted with permission of the National Association of Colleges and Employers, copyright holder). For more information on these and other legal issues, go to: www.naceweb.org. Also see the website of the U.S. Citizenship and Immigration Services — http://www.uscis.gov/portal/site/uscis

Employers can take advantage of a nationwide service provider who handles all the necessary paperwork and processing for international students to work in an organization.

Immigration Support Services 2215 Millennium Way Enola, PA 17025

Web: <u>www.immigrationsupport.com</u>

SAMPLE – STUDENT INTERN CODE OF PROFESSIONAL AND ETHICAL CONDUCT

While interning at your site, you are representing not just yourself, but the university and your fellow students, both current and future. Whether you do well or not at your site may have implications far beyond your current situation.

You are governed by the employer's employment policies, practices, procedures, dress code, and/or standards of conduct. To avoid any misunderstanding, it is recommended that you obtain clarification regarding such matters from your employer when you begin your assignment.

Your performance while on assignment as an intern may be measured by your employer's performance measurement process and/or a university- sponsored performance evaluation. You must receive a satisfactory (or better) performance rating for the period of your internship for the internship to be recognized by the university.

You must keep both the university Internship Program and your sponsoring employer apprised, at all times, of your current e- mail address, physical address and phone number.

You will follow all policies and procedures of the internship, as well as the university policies for oncampus classes. This includes completion of all assignments related to the internship.

You will conduct yourself in a professional manner at all times. This includes, but is not limited to:

Maintaining confidentiality regarding information accessed on any patients, clients, members, customers, employees, and products or services associated with the internship site; reporting for the internship ontime; using appropriate written and oral expression in all interactions with university personnel, managers, supervisors, employees, the public and clients; participating in any orientation or testing required by the internship site; Observing all established safety and sanitation codes; engaging in positive, good, legal behavior; accepting responsibility and accountability for decisions and actions taken at the internship site; ensuring that all interactions with guests, patients, clients, members, customers, the public and fellow employees are conducted with dignity and respect towards every person.

By my signature below, I indicate my understanding of, and willingness to conform to, the professional standards of the internship program delineated in the preceding general and specific statements. If any facet of the code of conduct is not adhered to, I may be at risk of losing academic credit / tuition, or in some other way may be penalized.

Name (print)		
Signature	Date_	
		٠

SAMPLE - HARASSMENT POLICY AND PROCEDURES

The Internship Program is committed to engaging students in professional and safe working/learning environments. In accordance with University policy (see student handbook), the Internship Program will not tolerate any form of harassment, intimidation or discrimination related to skin color, race (and related physical characteristics), gender, cultural heritage, ethnicity and nationality. This applies to site supervisors and co- workers toward a student, as well as students toward their site supervisors and co- workers.

Misconduct of Supervisor/Co- Workers Towards a Student Intern

The Internship Program encourages students to inform themselves of the site sponsor's sexual harassment policy and to follow it, should one exist. Beyond this, students need to report any incident as soon as possible, allowing both the University and the internship site the opportunity to promptly intervene. When a student intern contacts an Internship Program staff member and reports any form of harassment that he/she may be experiencing at the internship site, a member of the Internship Program staff will immediately facilitate appropriate interventions with the participating internship site and supervisor. All interactions during the intervention will be documented by the Internship Program staff and kept on file.

These interventions may include:

- 1. The Internship Program staff providing guidance to the intern on how to confront the individual(s) harassing him/her.
- 2. The Internship Program contacting the University legal counsel for assistance in facilitating the intervention(s).
- 3. The Internship Program contacting the site supervisor and establishing a formal meeting to present the allegations the intern reported. This meeting may or may not include the student being present at the meeting. The student will determine the level of involvement that he/she wishes to have in the face to face component of the intervention(s).
- 4. Removing the intern from his/her internship site.
- 5. Removing the site and or perpetrator from the approved list of internship partnerships.

Behav	fors that may constitute sexual harassment include (but are not limited to) the following:
□ sub	tle pressure for sexual activity
unr	necessary brushes or touches
\Box off	ensive sexual graffiti
□ disp	paraging remarks about one's gender
□ phy	vsical aggression such as pinching and patting
□ sex	ual innuendos or persistent use of sexually suggestive language which another person finds offensive,
demea	ning, or otherwise inappropriate
□ ver	bal sexual abuse disguised as humor
□ obs	scene gestures
□ sexi	st remarks about a person's clothing, body, or sexual activities
□ con	ditioning an educational or employment decision or benefit on submission to sexual conduct

Misconduct of Student Intern Towards a Supervisor/Co- Workers

The Internship Program asks site supervisors to report any incident as soon as possible allowing the University the opportunity to promptly intervene. When a site supervisor contacts an Internship Program staff member and reports any form of harassment being experienced at the internship site, a member of the Internship Program staff will immediately facilitate appropriate interventions with the student intern and

the participating site and supervisor. All interactions during the intervention will be documented by the Internship Program staff and kept on file.

These interventions may include:

- 1. The Internship Program staff providing guidance, if necessary, to the site on how to confront the student intern.
- 2. The Internship Program contacting the University legal counsel for assistance in facilitating the intervention(s).
- 3. The Internship Program contacting the student and site supervisor to establish a formal meeting to present the reported allegations.
- 4. Removing the intern from his/her internship site.

SAMPLE - INTERNSHIP POSITION DESCRIPTION

Position:		
Organization:		
Address 1:		
Address 2:		
City:	St:	Zip:
Contact:		
Title:		
Phone:	Fax:	
Email: Website: Majors Desired:		
GPA Desired:		
Is free and safe parking available?Yes If not, do you provide reimbursement for pa Part TimeHrs/Wk Full Time No Preference		No Time Preference:
Compensation: Per Hour / Stipend / Oth	ner	
When Available: Fall /Spring /Summer Job	/Project Descrip	tion:
Experience/Skills Desired:		

SAMPLE - EMPLOYER ASSESSMENT OF INTERN

Student:	Organization:					_				
general and specific pro	ssment instrument is intended to provide the ofessional skills and competencies. You are use it with the intern. Assessment ratings rational skills are used to be a second competencies.	asked t	o be	objec	tive a	nd can				
1 Unsatisfactory (Never demonstrates this ability/does not meet expectations) 2 Uncomplimentary (Seldom demonstrates this ability/rarely meets expectations) 3 Fair (Sometimes demonstrates this ability/meets expectations) 4 Commendable (Usually demonstrates this ability/sometimes exceeds expectations) 5 Exceptional (Always demonstrates this ability/consistently exceeds expectations)										
	oplicable to this internship experience, plean pelled to write comments in each section.		the	respo	nse bl	ank.				
4. Accepts responsibili	ays attention to others purposeful questions es appropriate resources ity for mistakes and learns from iences; takes appropriate risks	1 1 1 1		2 2 2 2 2	3 3 3 3 3	4 4 4 4 4	5 5 5 5 5			
2. Communicates idea	Computation Skills as/follows written materials and concepts clearly in writing matical procedures appropriate to the job		1 1 1	2 2 2	3 3 3	4 4 4	5 5 5			
2. Comprehends and f3. Effectively participa	Communication Skills an active and attentive manner follows verbal instructions attes in meetings or group settings tive verbal communication skills	1 1 1 1		2 2 2 2	3 3 3 3	4 4 4 4	5 5 5 5			

Comments:

 D. Creative Thinking & Problem Solving Skills 1. Seeks to comprehend and understand the "big picture" 2. Breaks down complex tasks/problems into manageable 3. Brainstorms/develops options and ideas 4. Respects input and ideas from other sources and people 5. Demonstrates an analytical capacity 	1 1 1 1	2 2 2 2 2	3 3 3 3 3	4 4 4 4	
Comments:					
E. Professional & Career Development Skills 1. Seeks to understand personal strengths and weaknesses 2. Exhibits self- motivated approach to work 3. Demonstrates ability to set appropriate priorities/goals 4. Exhibits professional behavior and attitude 5. Manages personal expectations consistent with work role 6. Shows interest in determining career direction Comments:	1 1 1 1 1	2 2 2 2 2 2 2	3 3 3 3 3 3	4 4 4 4 4 4	5 5 5 5 5 5 5
F. Interpersonal & Teamwork Skills 1. Relates to co- workers effectively 2. Manages and resolves conflict in an effective manner 3. Supports and contributes to a team atmosphere 4. Controls emotions in a manner appropriate for work 5. Demonstrates assertive but appropriate behavior	1 1 1 1	2 2 2 2 2	3 3 3 3 3	4 4 4 4 4	5 5 5 5 5
Comments:					
 G. Organizational Effectiveness Skills 1. Seeks to understand and support the organization's mission 2. Fits in with the norms and expectations of the organization 3. Works within appropriate authority and decision structures 4. Demonstrates a sense of responsibility and confidentiality 5. Interacts effectively and appropriately with supervisor 	1 1 1 1	2 2 2 2 2	3 3 3 3	4 4 4 4	5 5 5 5 5

Comments:

H. Basic Work Habits

1. Reports to work as scheduled	1	2	3	4	5
2. Is prompt in showing up to work and meetings	1	2	3	4	5
3. Exhibits a positive and constructive attitude	1	2	3	4	5
4. Dress and appearance are appropriate for this organization	1	2	3	4	5

Comments:

I. Character Attributes

1. Brings a sense of values and integrity to the job	1	2	3	4	5
2. Seeks to serve others even at the risk of personal	1	2	3	4	5
3. Refrains from gossip/respects the privacy of others	1	2	3	4	5
4. Behaves in an ethical manner	1	2	3	4	5
5. Respects diversity (religious/cultural/ethnic) of co- workers	1	2	3	4	5

Comments:

J. Open Category: Industry- Specific Skills

Are there any skills or competencies that you feel are important to the profession or career-field (represented by your organization) that have not been previously listed in this evaluation? If so, please list these skills below and assess the intern accordingly.

1.	1	2	3	4	5
2.	1	2	3	4	5
3.	1	2	3	4	5

K. Overall Performance

Unsatisfac	tory	Po	oor	Average	:	Good	О	ding	
0 (F				5 C+					

I have / I have not discussed this assessment with the intern.

Evaluator's Signature:	Date:
Title/Position:	Telephone:
Title/ Position:	1 elephone:

SAMPLE - STUDENT EVALUATION OF INTERNSHIP SITE

Your Name:					
Organization:	'ear:		_		
Location:Sup	ervisor:				
 Please rate the following aspects of your int Poor (2) Fair (3) Good (4) Excellent 	ernship experience on th	is scale:			
Site					
Physical environment was safe		1	2	3	4
An orientation was provided to the organization	1	1	2 2 2 2	3	4
Adequate resources were available to accomplis	h projects	1	2	3 3 3	4 4
Co- workers were accepting and helpful	1	1	2	3	4
Supervisor			_		
Supervisor provided a clear job description		1	2	3	4
Regular feedback was provided on my progress		1	2	3	4
An effort was made to make it a learning experi		1	2	3	4
Supervisor provided levels of responsibility con		1	2	3	4
Supervisor was supportive of the agreed- upor	work days and hours	1	2	3	4
Learning Experience	. 1/	4	•	2	
Work experience related to my academic discipl		1	2	3	4
Opportunities were provided to develop my con		1	2	3 3 3	4
Opportunities were provided to develop my int		1	2	3	4
Opportunities were provided to develop my cre	-	1	2		4
Opportunities were provided to develop my pro-	oblem - solving abilities	1	2	3	4
This experience has helped prepare me for the	workplace	1	2	3	4
Overall Value Rating for this Internship		1	2	3	4
Feel free to explain any of your responses to the	above criteria (use other	side if nec	iessa	ary):	
	••	3 .7	-	. .	
2. Would you work for this supervisor again?	Yes	No		Uncert	aın
3. Would you work for this organization again?	Yes	No	1	Uncert	ain
4. Would you recommend this organization to o	other students? Yes	No	1	Uncert	tain

TRUE RECOMMENDED RESOURCES

FOUNDATIONAL BOOKS

- Council for the Advancement of Standards in Higher Education Professional Standards
 9th Edition / Available at: http://www.cas.edu/standards
- Experiential Learning: Experience As The Source of Learning and Development David Kolb
- Handbook for Research in Cooperative Education and Internships

Patricia Linn, Adam Howard, Eric Miller

• International Handbook for Cooperative Education

Richard Coll and Chris Eames, Editors

World Association for Cooperative Education, 2004

Learning Outcomes: The Educational Value of Cooperative Education
 Cheryl Cates and Patricia Jones / Available from Patricia Jones – University of Michigan, Dearborn - pdjones@umd.umich.edu

• Standards of Good Practice for Education Abroad

http://www.forumea.org/resources/standards- of- good- practice

Strengthening Experiential Education: A New Era

http://www.nsee.org/introduction-strengthening

• Work - Based Learning: Bridging Knowledge and Action in the Workplace Joseph Raelin

HELP FOR FACULTY/STAFF:

- Canadian Association for Cooperative Education (CAFCE) <u>cafce.ca</u>
- Cooperative Education and Internship Association (CEIA) <u>ceiainc.org</u>
- National Association of Colleges and Employers (NACE) naceweb.org
- National Association for Foreign Student Advisors (NAFSA) nafsa.org
- National Society for Experiential Education (NSEE) <u>nsee.org</u>
- The Forum on Education Abroad (The Forum) forumea.org
- Learning from Experience: A Resource Book By and For Co- op/Internship Professionals
- Internship Net Listsery (1,200+ internship colleagues)
- Send an email to: listserv@listserv.messiah.edu
- Do not put anything in the "Subject" line
- In the Body type: subscribe internship net First and Last Name

HELP FOR STUDENTS:

- Find Your First Professional Job: A Guide for Co ops, Interns, and Full Time Job Seekers Scott Weighart
- GoinGlobal goinglobal.com
- InternQube: Professional Skills for the Workplace

Michael True - InternQube.com

• The Bases of Competence: Skills for Lifelong Learning and Employability

Frederick Evers, James Rush, and Iris Berdrow

• The Successful Internship (Third Edition)

H. Frederick Sweitzer and Mary King

HELP FOR EMPLOYERS

• Starting And Maintaining A Quality Internship Program (free PDF)

Michael True - <u>InternQube.com</u>

• Total Internship Management: The Employer's Guide to Building the Ultimate Internship

Program - InternBridge.com

THIRD PARTY INTERNATIONAL INTERNSHIP PROVIDERS:

- Academic Internship Council (AIC) <u>academicinternshipcouncil.org</u>
- Australian Internships http://internships.com.au
- British Council britishcouncil.org
- CAPA International Education <u>capa.org</u>
- Council on International Educational Exchange (CIEE) ciee.org
- CRCC Asia crccasia.com
- European Career Evolution http://ece-ireland.com
- Foundation for International Education <u>fie.org.uk</u>
- Global Experiences globalexperiences.com
- Go Abroad goabroad.com
- The Intern Group theinterngroup.com

SOFTWARE PROVIDERS

- CSO http://csoresearch.com/
- Handshake www.joinhandshake.com
- NACElink / Symplicity <u>symplicity.com/products/csm.html</u>
- Purple Briefcase http://www.purplebriefcase.com/
- Sophia planetsoftware.com.au/products/sonia/

TRENDS

http://pakobserver.net/detailnews.asp?id=262266

http://monitor.icef.com/2013/04/international- internships- are- increasingly- valued- by- employers/

DEFINING AN INTERNSHIP

The Forum – Standards of Good Practice - Guidelines for Volunteer, Internship Experience and Work Programs Abroad http://www.forumea.org/guidelines-for-view-programs-abroad

NAFSA https://www.nafsa.org/uploadedFiles/NAFSA Home/Resource Library Asset s/Networks/AREA1/Best Practices on How to Vet Partners.pdf

NSEE – Principles of Good Practice - http://www.nsee.org/8- principles

PAID VS. UNPAID

Second Circuit Court of Appeals (July 2015 Ruling) -

http://www.seyfarth.com/publications/OMM070215- LE

U.S. Department of Labor – Fact Sheet #71

http://www.dol.gov/whd/regs/compliance/whdfs71.pdf

European Union

http://www.cafebabel.co.uk/society/article/an- eu- wide- law- on- internships- still- a- pipe-dream.html

http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-

//EP//NONSGML+REPORT+A7- 2010- 0197+0+DOC+PDF+V0//EN

MONITORING & ASSESSMENT

Australia (Course Sample)

http://www.waceinc.org/hongkong/linkdocs/papers/Australia/Refereed%20 Paper%2020.pdf

Evaluation – Student of Themselves (Sample)

https://www.surveymonkey.com/s/PDVYQBT

Evaluation – Employer of Student (Sample)

https://www.surveymonkey.com/s/TGT6DQ3

Work/Reflection Log

http://www.interngube.com/articles.html ("Foundational" section)