

Internship Program Guidelines

Summary

The Columbus State University Internship Program seeks to partner with area companies and agencies to enhance the education of CSU students by providing relevant field experience prior to graduation. Qualified internships should provide students with learning experiences that are complementary to the academic foundation presented in the classroom while extending beyond the boundaries of the typical scholastic environment.

Purpose

This document presents the goals, requirements, and procedures for generating and coordinating internship opportunities.

Policy

Columbus State University Internship program

PROCESSES

The CSU Center for Career Development (CCD) is responsible for generating internship opportunities by contacting employers and responding to employer inquiries regarding the CSU Internship Program. These opportunities will be posted on the College Central website for students to review and will be forwarded to relevant CSU colleges/departments for posting. Primarily, the CCD will serve as a facilitator of the information.

Students will be responsible for reviewing the opportunities, securing faculty permission based on eligibility within his/her course of study, and contacting the employer for an interview. Because a CSU Internship for course credit is an academic activity, after the internship is secured the management of the relationship and the activities rest with the sponsoring faculty member.

Below are the basic steps to follow to insure a successful internship experience:

1. An inquiring company/supervisor will receive a packet of information from CCD. This packet will include, but is not limited to:
 - Supervisor's Guidelines
 - Internship Position Description Form (to be returned to the CCD Internship Coordinator)

- Employer Evaluation Form
2. Upon receiving the completed Internship Position Description Form, the CCD Internship Coordinator is responsible for posting the announcement, and, in selected cases, forwarding a copy to relevant Colleges and/or departments for on-site posting.
 3. Interested students will be responsible for reviewing the opportunities, securing from the CCD a copy of the description he/she is interested in along with the Faculty Authorization Form.
 4. The inquiring student is required to invite a professor in the discipline related to the internship to be the Sponsoring Faculty Member. After evaluating the student's eligibility, the professor must sign the Sponsoring Faculty Authorization Form, which the student returns to the CCD Internship Coordinator. At that point additional appropriate paperwork may be given to the student:
 - Student Information and Guidelines
 - Instructions for Written and Oral Reports by Intern
 - Contact information for the company/agency. (The student should not contact the employer until faculty approval has been granted.)
 5. After all qualifications are verified, all parties (student, sponsoring faculty member, and employer) may meet to discuss the specifications of the internship and to agree on at least three learning objectives of the internship.
 6. During the semester, the sponsoring faculty member will be responsible for the following:
 - Site visit (and completion of the Site Visit Form), if necessary
 - Evaluation of student (both written and oral portions of the internship)
 - Submitting of grade for credit.

Columbus State University Internship Program

FEDERAL GUIDELINES ON INTERNSHIPS

Publication of these guidelines is for general information and is not to be considered in the same light as official statements of position contained in the regulations. More information can be found from the U.S. Wage and Hour Division (WHD) or sought out through legal counsel.

Fact Sheet #71: Internship Programs Under The Fair Labor Standards Act

This fact sheet provides general information to help determine whether interns must be paid the minimum wage and overtime under the Fair Labor Standards Act for the services that they provide to “for-profit” private sector employers.

Background

The Fair Labor Standards Act (FLSA) defines the term “employ” very broadly as including to “suffer or permit to work.” Covered and non-exempt individuals who are “suffered or permitted” to work must be compensated under the law for the services they perform for an employer. Internships in the “for-profit” private sector will most often be viewed as employment, unless the test described below relating to trainees is met. Interns in the “for-profit” private sector who qualify as employees rather than trainees typically must be paid at least the minimum wage and overtime compensation for hours worked over forty in a workweek.*

The Test For Unpaid Interns

There are some circumstances under which individuals who participate in “for-profit” private sector internships or training programs may do so without compensation. The Supreme Court has held that the term “suffer or permit to work” cannot be interpreted so as to make a person whose work serves only his or her own interest an employee of another who provides aid or instruction. This may apply to interns who receive training for their own educational benefit if the training meets certain criteria. The determination of whether an internship or training program meets this exclusion depends upon all of the facts and circumstances of each such program.

The following six criteria must be applied when making this determination:

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

If all of the factors listed above are met, an employment relationship does not exist under the FLSA, and the Act’s minimum wage and overtime provisions do not apply to the intern. This exclusion from the definition of employment is necessarily quite narrow because the FLSA’s definition of “employ” is very broad. Some of the most commonly discussed factors for “for-profit” private sector internship programs are considered below.

Similar To An Education Environment And The Primary Beneficiary Of The Activity

In general, the more an internship program is structured around a classroom or

academic experience as opposed to the employer's actual operations, the more likely the internship will be viewed as an extension of the individual's educational experience (this often occurs where a college or university exercises oversight over the internship program and provides educational credit). The more the internship provides the individual with skills that can be used in multiple employment settings, as opposed to skills particular to one employer's operation, the more likely the intern would be viewed as receiving training. Under these circumstances the intern does not perform the routine work of the business on a regular and recurring basis, and the business is not dependent upon the work of the intern. On the other hand, if the interns are engaged in the operations of the employer or are performing productive work (for example, filing, performing other clerical work, or assisting customers), then the fact that they may be receiving some benefits in the form of a new skill or improved work habits will not exclude them from the FLSA's minimum wage and overtime requirements because the employer benefits from the interns' work.

Displacement And Supervision Issues

If an employer uses interns as substitutes for regular workers or to augment its existing workforce during specific time periods, these interns should be paid at least the minimum wage and overtime compensation for hours worked over forty in a workweek. If the employer would have hired additional employees or required existing staff to work additional hours had the interns not performed the work, then the interns will be viewed as employees and entitled compensation under the FLSA. Conversely, if the employer is providing job shadowing opportunities that allow an intern to learn certain functions under the close and constant supervision of regular employees, but the intern performs no or minimal work, the activity is more likely to be viewed as a bona fide education experience. On the other hand, if the intern receives the same level of supervision as the employer's regular workforce, this would suggest an employment relationship, rather than training.

Job Entitlement

The internship should be of a fixed duration, established prior to the outset of the internship. Further, unpaid internships generally should not be used by the employer as a trial period for individuals seeking employment at the conclusion of the internship period. If an intern is placed with the employer for a trial period with the expectation that he or she will then be hired on a permanent basis, that individual generally would be considered an employee under the FLSA.

* The FLSA makes a special exception under certain circumstances for individuals who volunteer to perform services for a state or local government agency and for individuals who volunteer for humanitarian purposes for private non-profit food banks. Wage and Hour Division also recognizes an exception for individuals who volunteer their time, freely and without anticipation of compensation for religious, charitable, civic, or humanitarian purposes to non-profit organizations. Unpaid internships in the public

sector and for non-profit charitable organizations, where the intern volunteers without expectation of compensation, are generally permissible. WHD is reviewing the need for additional guidance on internships in the public and non-profit sectors

INTERN EMPLOYMENT CONSIDERATIONS

Workers' and Unemployment Compensation

Workers' compensation boards have found that interns contribute enough to a company to make them employees. It's wise to cover interns under your workers' compensation policy even though you aren't 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 your organization, and you don't do anything about it, your organization opens itself to the risk of lawsuits. Take time to advise your interns of appropriate workplace behavior, the organization's harassment policy, and complaint procedures.

Student-employees, including international students, are entitled to full protection of federal anti-discrimination 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.nacweb.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: www.immigrationsupport.com

SUPERVISOR’S GUIDELINES

General Information Regarding the Internship Experience

Mission Statement of the Internship Program

The Columbus State University Internship Program seeks to partner with area companies to enhance the education of CSU students through providing relevant field experience prior to graduation. Academically-qualified internships should provide students with learning experiences that are complementary to the academic foundation presented in the

classroom while extending beyond the boundaries of the typical academic environment.

Relationship of Work to the Student's Career

Internship assignments should relate as much as possible to the student's curriculum and career goals. Routine assignments such as filing are part of the learning experience but should not be the bulk of the student's responsibilities. Clerical/secretarial, counter sales, and similar experiences are unacceptable. Assignments should be varied to keep the student interested in the assignment. Responsibilities should be challenging, stimulating, and provide the student the opportunity to make a contribution to the company.

Responsibility

The student intern is highly motivated to meet the demands of the employer in the development of the tasks assigned. We appreciate your setting a work schedule to fit the student's course schedule, but do not be too lenient. Establish the work requirements and the hours to be worked at the beginning. Insist that students follow all the rules established for regular employees.

Communication

During the work assignment, the student intern most frequently interacts with the immediate supervisor. As a result, the supervisor is in a position to strongly influence the student's perception of the business world. The supervisor may help the student by addressing observable strengths and weaknesses. The supervisor's ability to provide encouragement and offer immediate, constructive feedback is integral to the student's success. Sometimes the student is supervised by one individual while being mentored by another. If this is the case in your organization, the mentor is also encouraged to address the student's observable strengths and weaknesses as well as offer constructive criticism.

Building Professional Attitudes

Since the student is in a stage of life where professional attitudes are being formulated, please maintain contact with the student in order to review performance, improve work habits, character, ethics and judgment. Good grades should be stressed and the need for harder study emphasized.

Education Through Internships

The Columbus State University Internship Program is growing and students value it highly. Please consider expanding your participation by using more than one student. We also hope our students are strongly considered for career positions when they graduate. When administered properly, an internship work experience provides a superior method of education for the student. But, in order to be effective, the University and employers must correctly place students, the employer must offer meaningful work assignments which are consistent with career goals, and students must endeavor to derive everything they can from their academic work and seek to develop themselves in a responsible manner as an employee. When these conditions are fulfilled, an

incomparable learning situation is created.

Specific Responsibilities of the Employer Organization/Supervisor

Internship Syllabus

The employer is encouraged to create a syllabus or plan of activities for the semester in one- to two-week increments. Creating a syllabus should benefit the employer, the student, and representatives of the University. First, the company will have a well-developed idea of what it hopes to gain from the student's employment. Pre-planning the semester also helps insure that the student receives a well-rounded, balanced exposure to opportunities in your company and industry, and the student will have a clearer understanding of the learning objectives. Finally, the syllabus will help the Faculty/Coordinator in evaluating the educational value of the proposed experience.

Orientation to the Organization

In acquainting the student with the company, the supervisor should:

- Provide the student with an overview of the organization's purpose, philosophy and structure
- Provide the student with an Internship Syllabus
- Describe the student's position -- daily job functions and expectations
- Discuss administrative details with the student -- hours, record keeping, time sheets, overtime, sick and personal leave, holidays and lunch hours
- Orient the student to the office or department -- conduct a tour, make introductions, discuss office procedures, and office resources
- Answer questions on parking, dress code, and other matters

The Internship

In addition to the daily work responsibilities, the student and supervisor will be challenged to establish a specific tie-in to the academic program. With the aid of the college representatives, the student and supervisor must identify a particular problem(s) or process(es) connected to the job responsibility to study for improvement. At the end of the internship experience, the student will complete a written report and a detailed oral presentation that focuses on the problem(s), which should be reflected in the learning objectives. This presentation may be given in front of a faculty panel and the supervisor is also invited to attend.

Site Visit

The Sponsoring Faculty member may schedule a site visit with the supervisor and the student. If you have any questions or concerns before this visit is scheduled, please feel free to call us.

Supervisor's Evaluation

As the immediate supervisor, you will be asked to evaluate the student in several categories. Please take the time to discuss your evaluation with the student before the work period is complete.

Program Requirements for Students

All student interns must complete at least 135 hours of work during the semester of the internship. For a Fall or Spring semester, this could mean that the student works 9 hours per week for 15 weeks or the equivalent. Students completing an internship in the Summer term will enroll for the June Session which is eight weeks long. Summer interns must also work a minimum of 135 hours – 16.5 hours per week for eight weeks or the equivalent.

The student, along with all parties, must agree to the learning objectives of the internship and at the end of the semester present both an oral and written report to various faculty.

INTERN JOB DESCRIPTION TIPS

The below informative template was created by Catherine Smith MacDermott of St. Edward's University, Austin, Texas. She researched the components of an internship necessary for guaranteed intern satisfaction. Use the below information to craft an internship opportunity that will be most beneficial to all stakeholders: intern, business, and university.

Job Description: The internship job description should be exciting, informative, and help your future interns better understand what they will gain as a result of working with your organization, what skills they will hone or develop, how their work will impact stakeholders, what they will be working on. In a nutshell, sell the company, sell the internship, and highlight requirements.

About the company: Tell the prospective intern what makes you special and why students would want to work for your company. Share the culture of your office. This is important because you want students to self-select in (or out) of applying based on their knowledge your company culture and work environment. Be sure this is done using exciting, non-technical, inflated, boring business language.

Description of tasks/projects: While financial compensation is great, students care most about what they will learn, what skills they will develop, and what opportunities they will have to utilize their education.

Begin with a captivating question or statement. Example – “Are you eager to begin a career in the hospitality industry but have limited experience?” OR “This is a great opportunity for anyone planning to begin a career in the hospitality industry!”

- use energetic language to describe the opportunity and who the intern will be

collaborating with (example: — “During this internship you will have the opportunity to work with a team of seasoned hotel employees as they research the 5 biggest game-changing trends in the hotel industry and strategize ways hotel XXX can leverage opportunities to meet these trends.”

- describe the intern project(s)/tasks in light of the knowledge they will gain, the mentorship they will experience, and the network opportunities they will be exposed to

- focus on what kind of learning experience you can provide for the student (example: “You will be offered the opportunity to work on exciting projects like....”)

- focus on the skills the student will enhance during this internship

- All assignments add value both to our company and to your education experience

Description of ideal candidate:

- describe your ideal candidate using plenty of adjectives

- “The ideal candidate will possess the following skills...”

- instead of identifying a particular major, identify particular coursework that will have been helpful prior to application (e.g. foreign language, computer course, speech/writing courses, etc.)

Training and Assessment: Interns seek mentorship, training, and feedback. Let them know who will mentor them, how often they can expect to meet with their supervisor, and how often they will receive formal and informal feedback.

Related USG Policy

4.1.1 Institutional Responsibility

5.1 General Policy

Last Update

7/8/2005

Responsible Authority

Career Center Director & Employer Relations Specialist