

Starting and Maintaining A Quality Internship Program

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INTRODUCTION

How can organizations meet the needs of today and prepare the workforce of the future? One solution is to develop a high quality internship program. This booklet will assist you in doing just that.

What Is An Internship?

"An academic internship is a form of experiential education that integrates knowledge and theory learned in the classroom with practical application and skill development in a professional setting. Students earn academic credit, or there is some other connection to a degree-granting, educational institution. This work/learning arrangement is overseen by a faculty or staff member of an educational institution and by a designated employee of an organization. The internship is usually the length or equivalent of an academic term, may be part-time or full-time, paid or unpaid. An integral component of the experience that distinguishes it from other types of work is one or more forms of structured and deliberate reflection contained within learning agendas or objectives."

(formulated by subscribers to the Internship-Net Listserv – May 2010)

Characteristics include:

- ⊕ Duration of anywhere from three months to two years, but a typical experience usually lasts from three to six months.
- ⊕ Generally a one-time experience.
- ⊕ May be part-time or full-time.
- ⊕ May be paid or non-paid.
- ⊕ Internships may be part of an educational program, providing careful monitoring and evaluation for academic credit.
- ⊕ An important element that distinguishes an internship from a short-term job or volunteer work is that an intentional "learning agenda" is structured into the experience.
- ⊕ Learning activities common to most internships include learning objectives, observation, reflection, evaluation and assessment.
- ⊕ An effort is made to establish a reasonable balance between the intern's learning goals and the specific work an organization needs done.
- ⊕ Internships promote academic, career and/or personal development.

(Adapted from materials published by the National Society for Experiential Education)

How Do Internships Benefit Employers?

- ⊕ Year round source of highly motivated pre-professionals
- ⊕ Students bring new perspectives to old problems
- ⊕ Visibility of your organization is increased on campus
- ⊕ Quality candidates for temporary or seasonal positions and projects
- ⊕ Freedom for professional staff to pursue more creative projects
- ⊕ Flexible, cost-effective work force not requiring a long-term employer commitment
- ⊕ Proven, cost-effective way to recruit and evaluate potential employees
- ⊕ Your image in the community is enhanced as you contribute your expertise to the educational enterprise

STEPS TO BEGINNING AN INTERNSHIP PROGRAM

Designing an internship program that meets your needs

As varied as organizations are in age, size, industry and product, so too are their internship activities. How do you know what kind of program will work best for you? Designing an internship program to meet your needs is as easy as five steps.

Step 1: Set goals

- ✦ What does your organization hope to achieve from the program?
- ✦ Are you a small organization searching for additional help on a project?
- ✦ Is your organization growing quickly and having difficulty finding motivated new employees?
- ✦ Are you a nonprofit that doesn't have a lot of money to pay, but can provide an interesting and rewarding experience?
- ✦ Is your organization searching out new employees with management potential?

A careful discussion with management can create a consensus on program goals that can be understood by all involved. The program and internship can be designed to best meet those expectations. As many staffing professionals know, in order for a program to be successful, it will require the commitment of management.

Step 2: Write a plan

Carefully plan and write out your internship program and goals. Managers, mentors, interns and university career centers are all going to be reading what you write about the internship. Draft a job description that clearly explains the job's duties (*see the Internship Position Description Worksheet later in this manual*). Do you want someone for a specific project? What about general support around the workplace? How about giving the intern a taste of everything your company does? Structure the internship ahead of time so that you can be sure to meet your goals and not find yourself floundering partway through. See the Internship Position Description later in this manual.

THINGS TO THINK ABOUT

How much will you pay the intern? Wages vary widely from field to field; be sure yours are competitive.

Where will you put the intern? Do you have adequate workspace for them? Will you help make parking arrangements, living arrangements, etc.?

What sort of academic background and experience do you want in an intern? Decide on standards for quality beforehand — it'll help you narrow down the choices and find the best candidates.

Who will have the primary responsibility for the intern? Will that person be a mentor or merely a supervisor?

What will the intern be doing? Be as specific as possible. Interns, like others in the process of learning, need structure so they don't become lost, confused or bored.

Do you want to plan a program beyond the work you give your interns?

Will there be special training programs, performance reviews, lunches with executives, social events? Keep in mind that your interns are walking advertisements for your company. If they have a good experience working for you, they're likely to tell their friends — word gets around. A bad internship, by contrast, can only hurt your chances of attracting good students.

These are just some of the questions to consider. Your organization's approach will depend on your specific resources and needs.

A very important part of your plan should be the assignment of a mentor or supervisor — that is, someone from the intern's department who will be in charge of the intern. This person doesn't have to be a teacher per se, but should be selected because he or she likes to teach or train and has the resources to do it. If the person you select has never mentored an intern before, give him or her some basic training in mentoring.

Step 3: Recruit an intern(s)

How will you find those ideal candidates to fill your internship position(s)? ***The number-one tip from those who have established programs is to get out there early!*** This cannot be overemphasized to organizations that want the very best interns. Begin searching three to four months before you need a student to begin. Starting early has other advantages: the longer you accept applications, the better your chance of finding the best person for the job. The sooner you get one, the longer you have to form a good working relationship with him or her.

When you're out recruiting, **develop relationships with local recruitment resources.** Promote yourself with school-to-work coordinators in high schools and with the career or internship centers at colleges and universities, attend internship and job fairs, place ads in their school newspapers and websites, and send material to student organizations. Promote yourself elsewhere in the city by getting to know people at local employment organizations, and youth employment projects. Post advertisements on such organizations' websites and get to know the contacts there. Of course, be sure to have a presence on social network sites such as Facebook. Remember to **choose your interns just as carefully as you'd choose permanent employees.** After all, they might be permanent employees some day. You're making an investment; time and money will go into this person. This is where the interview will come in handy. Is the intern truly motivated, or does he or she just want a job? Will the intern fit into your organization's culture? Does he or she have the level of experience you need? With careful consideration of whom to hire at the beginning, you can avoid some of the most common pitfalls of internships.

Last, but certainly not least, **learn the legal implications** of hiring interns. Just like other employees, they are subject to legal protections and regulations. Protect yourself and your intern by knowing the laws. What work can and can't you assign? This is especially important if your company employs a lot of international students, who need special qualifications to work in the U.S. Consult your corporate lawyer or the intern's school office of international education, if you think you might run into problems. See the legal section later in this manual.

Step 4: Manage the intern(s)

Once you've hired a worker, you put them to work, right? That's true for interns as well as regular employees, but with an intern, you'll be making an important first impression. The beginning days of the internship program are often its defining days. When you give them their first tasks, you're signaling what can be expected in the future. If you give them nothing or very little to do, it sends a message that this job will be easy — and boring. Interns don't want that; of course, neither do employers. The organization of your internship program will probably be the single most important influence on an intern's impression of your organization, and thus the chances that he or she will come back. So how do you “plan for success”?

Consider the goals of your program. The nature of the program and the activities that you choose to undertake should directly relate to your program goals.

First, orient your intern to his or her new workplace. This might take the form of a conventional orientation program or merely a walk around the office, depending on the size of your company. After all, even though they may not be permanent employees, they'll be spending a great deal of time in your workplace. Give interns an overview of your organization; some companies give talks or hand out information about the company's history, vision and services. Explain who does what and what the intern's duties will be. Introduce him or her to co-workers and give them a complete tour of the facility. Making your intern at home in the office is your first step to bringing him or her back.

Give your intern the resources he or she needs to do the job. That may sound obvious, but you'd be surprised at how many companies stick their interns out in an out-of-the-way room or transfer them from desk to desk. That sends a potent message you don't want to send: Interns aren't important; we don't want you here. Give the intern a desk and show them where to get needed supplies. If you intimidate your interns into silence, you could miss out on valuable contributions to your projects—or warnings about impending problems.

Keep an eye on the intern. This doesn't mean to watch their every move, but do make sure you know what's happening with their daily tasks. Watch for signs that the intern is confused or bored. As often as silence means that an intern is busy, it also could mean that he or she is confused and shy about telling you so. It's easy to be shy in a workplace full of strangers who all know each other. See whether the intern is trying to do anything that requires someone else's input. Make sure that work is taking precedence over web browsing or texting friends. Paying attention early helps you head off problems and bad habits.

Give them lots of feedback! Especially if your interns have never done this kind of work before, they'll want to know if their work is measuring up to your expectations. No matter what the level of experience, they need you, as a more experienced worker, to let them know if their work is officially “okay”. Periodically, examine what your intern has produced and make suggestions.

+ Informal Feedback

Informal feedback is sometimes not perceived by the student as feedback. Informal feedback shows up as comments or a light hearted nudge. When using informal feedback be clear with your intent. The more direct, the more likely the student will perceive this to be

an area of focus. Positive feedback should be given freely. Areas of growth should be presented in a private setting where the student is not embarrassed. Feedback should be delivered as often as possible to encourage the student to continue to develop.

✦ **Formal Feedback**

Formal feedback should be prepared and delivered in a private meeting with the co-op to discuss student's strengths and areas for growth. It should be designed so the manager achieves his/her desired objective. Students should have clear objectives of what areas of growth need to be addressed. Use specific examples of student behavior whenever possible so students have clear ideas of what areas need improvement.

Evaluate the intern's progress every now and then.

Remember those goals you outlined before? A few weeks after the internship begins, it's time to see how well you and your intern are meeting those goals. Evaluation processes differ. Yours might be as formal as written evaluations every three weeks or as informal as occasional lunches with the internship coordinator and/or the intern's mentor. Some companies have the intern evaluate the experience and the company as well. Again, your structure is largely up to your corporate culture and needs. As an added bonus, these evaluations will be handy later if you decide to interview a former intern for full-time work, or to publicize how successful your program has been. Check out the forms found further on in this manual.

Maintaining program popularity will require hard evidence that your organization is getting a return on its investment. Some organizations have adopted a process of formal exit interviews. Through this process they can determine if interns are leaving the company having had a good experience, and it provides valuable feedback to managers for program planning in the following year.

In addition to qualitative measures, a number of quantitative measures should be adopted. Some common measures include the number of interns that become full-time employees; repeat requests for interns from managers; and growing numbers of intern applicants. In order to successfully measure your own program outcome, you should return to the stated program goals, and address those outcomes.

Keep your focus on the future

With the job market experiencing a dearth of qualified employees, it only makes sense to investigate early those quality high school, community college, technical school and college students whom you can bring back later. Take on interns now and you'll have a competitive advantage in recruiting the best workers - you'll already be known to the employees you want most. Your new workers will already be trained for your workplace and loyal to your company, lowering training time, recruiting costs and turnover rates. You'll build a reputation that will pay off with students, colleges and the community. And your company will save money while benefiting from the input of talented, enthusiastic, innovative people. With all of these advantages, you might find that you can't afford not to do internships.

INTERNSHIP POSITION DESCRIPTION WORKSHEET

Position:

Organization:

Address 1:

Address 2:

City:

St:

Zip:

Contact / Title:

Phone / Email:

Supervisor / Title:

Phone / Email:

Website:

Majors Desired:

GPA Desired:

Is free and safe parking available? Yes No

If not, do you provide reimbursement for parking? Yes No

Time Preference:
 Part Time Hrs/Wk
 Full Time
 No Preference

Compensation:
_____ Per Hour
_____ Stipend
_____ Other

When Available:
 Fall
 Spring
 Summer

**Job/Project
Description:**

**Experience/
Skills Desired:**

TEN CONCERNS OF INTERNS

1. Give us real work!

It can't be said too many times that interns want to work and learn. An internship can help you get a job done that you couldn't otherwise, right? If you've brought on an intern as a recruitment tool, then how will you be able to assess their abilities? It just makes sense to utilize your interns well.

2. Do what you say, and say what you do!

Be honest with your interns about what they can expect during their internship. If the job will require stuffing some envelopes, then make that clear. But if you tell the intern they will be researching a project, and they spend 90% of their time doing "grunt work," then bad feelings will develop. Honesty doesn't cost you anything, and it will make the interns feel that much more respected.

3. We like feedback!

Remember that interns are students, and they may not have the business skills and experiences that you take for granted. If your intern makes an oversight, just pull him or her aside and explain how the situation should be handled in the future. Also, consider using a tool like InternQube.com mentioned at the end of this manual.

4. We want to be included too!

Is there a staff meeting they can attend? Can they quietly tag along to that next project meeting or office luncheon? Include them in the daily life of your workplace. After all, if you help them gain a broader perspective, it will help everyone involved.

5. Please explain.

When you assign work, make sure you give a detailed explanation. While the work may seem trivial and obvious to you, it may not be obvious to someone who's never done it before. Patience and a few extra minutes at the beginning will pay off later when your intern can produce good work independently.

6. I want a mentor!

Make sure that interns have a mentor or supervisor to provide guidance. Make it someone who truly likes to teach, and the experience will be even better.

7. A minute of your time, please.

The best mentor in the world is useless if he or she can't, or won't, spend the necessary time mentoring. As newcomers, interns may not speak up if they're feeling ignored, so the burden of making sure they're okay is on the mentor. They should schedule regular times to meet with the intern.

8. Be prepared!

That wonderful day has arrived and the intern goes to start their internship only to learn that no one knew they were coming, and there is no place for them to work. Brief your staff of the student's impending arrival, and help the intern get started on a positive note.

9. Um...I need a chair.

It is amazing how many employers hire an intern and don't think about the fact that they will need a desk, chair, phone and a computer in order to do the task assigned. It isn't fun or efficient to move an intern from desk to desk. If you want to get a job done, you need to supply the intern with the tools they need.

10. Show me the money (as best you can).

While internships differ, and each industry has its own personality, remember that interns have expenses. Your organization may not be in a position to pay much, but anything can help. Maybe you can help pay for their parking and/or transportation, or develop some other creative way to assist them.

ELEMENTS OF A SUCCESSFUL VIRTUAL INTERNSHIP

If a virtual internship is proposed by a student, or offered by a prospective internship site, the following components should be considered prior to final approval:

- ✦ The organization must be an established, legitimate business or non-profit, as evidenced by considerations such as a physical location, website, history of offering paid employment, listed telephone number, tax ID number, etc. The college may choose to authorize a virtual internship with an individual, but that individual needs to agree to a thorough background check.
- ✦ The organization must agree to offer an internship that meets the criteria of a legitimate internship as outlined by NACE, the National Association of Colleges and Employers:
 - 1) The experience must be an extension of the classroom: a learning experience that provides for applying the knowledge gained in the classroom. It must not be simply to advance the operations of the employer or be the work that a regular employee would routinely perform.
 - 2) The skills or knowledge learned must be transferable to other employment settings.
 - 3) The experience has a defined beginning and end, and a job description with desired qualifications.
 - 4) There are clearly defined learning objectives related to the student's professional goals.
 - 5) There is supervision by a professional with expertise and educational and/or professional background in the field of the experience.
 - 6) There is routine feedback by the experienced supervisor.
 - 7) There are resources, equipment, and facilities provided by the host employer that support learning objectives/goals.
- ✦ The organization must agree to a site visit from a representative of the college.
- ✦ The organization and student (with advisor approval) need to agree on a clear, detailed position description which covers all expectations and outlines what will constitute a successful internship.
- ✦ The organization's internship site mentor must provide the student with regular supervision, mentoring, and feedback as outlined in #5 and #6. In a virtual internship, 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 which is 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, Zoom, GMail video chat or a similar technology. This meeting will be used to provide more personalized feedback to the student and correct any issues.

- ✦ If the virtual internship is in the local area (a reasonable drive from campus), the employer needs to meet with the student in a public place (e.g., coffee shop, restaurant) 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 virtual intern 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 student must provide the faculty advisor or internship professor with the outputs of the internship (e.g., written materials produced, analysis completed)

Adapted from [InternQube: Professional Skills for the Workplace](#) by Michael True with additional input from internship professionals via the Internship-Net listserv.

LEGAL ISSUES

Do you have to pay interns?

Below is Fact Sheet #71 updated and issued by the U.S. Department of Labor in January 2018.

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

Wage and Hour Division (WHD)

(Updated January 2018)

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

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

Background

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

The Test for Unpaid Interns and Students

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

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

Courts have described the “primary beneficiary test” as a flexible test, and no single factor is determinative. Accordingly, whether an intern or student is an employee under the FLSA necessarily depends on the unique circumstances of each case.

If analysis of these circumstances reveals that an intern or student is actually an employee, then he or she is entitled to both minimum wage and overtime pay under the FLSA. On the other

hand, if the analysis confirms that the intern or student is not an employee, then he or she is not entitled to either minimum wage or overtime pay under the FLSA.

Where to Obtain Additional Information

This publication is for general information and is not a regulation. For additional information, visit our Wage and Hour Division Website: <http://www.wagehour.dol.gov> and/or call our toll-free information and helpline, available 8 a.m. to 5 p.m. in your time zone, 1-866-4USWAGE (1-866-487-9243).

Footnotes

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

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

What does this mean?

“That said, businesses still need to understand the objective of the internship analysis, which is to ensure that interns are receiving a valuable educational benefit by participating in these programs as opposed to providing a source of free labor to businesses. A review of the current test shows it still contains many of the same factors as the old test, e.g., not displacing the work of paid employees and an understanding that there is no guarantee of employment at the conclusion of the internship program. These factors make sense when viewed against the purpose of a bona fide internship program. For example, DOL does not want businesses to dangle guaranteed employment to an intern in order to persuade him/her to work for free for a period of time. Similarly, a business should ask itself what if it does not use an internship program? If the answer is it would then need to hire additional employees to perform certain tasks, this would continue to be a huge red flag.

On both a legal and practical perspective, as the new test incorporates specific consideration for academic credit and accommodating an intern’s academic calendar, businesses would be wise to establish internship programs in partnership with educational establishments such as colleges and universities. The educational establishment would have a vested interest in ensuring that such internship programs provide a known educational benefit to its students which would in turn help ensure such students are not being exploited as free labor. If this is done by offering academic credit and imposing certain educational standards such as program evaluations and/or periodic testing for subject matter knowledge, it would be difficult to argue the intern is not the primary beneficiary of the program.” – *DOL’s New Internship Test: The Rebirth of the Internship Program* by John Ho, New York Law Journal, February 23, 2018

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.naceweb.org. Also see the website of the U.S. Citizenship and Immigration Services – <https://www.uscis.gov/>.

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 - <https://immigrationsupport.com/>

ORIENTING AND TRAINING INTERNS

Many students are unfamiliar with the activities, environment and objectives of business and industry. A thorough orientation and training can greatly help in these areas.

The sooner your student interns understand what your organization does and how it operates, the sooner they can assume assigned responsibilities and become productive. You can help this process by providing the following kinds of information about your site:

Prior to the First Day

- ✦ Set up an organized work area for the intern
- ✦ Set up phone, voicemail, computer, email, and internet access and/or other resources necessary for them to accomplish the tasks you have stipulated in the internship position description
- ✦ Outline work expectations for the duration of the internship
- ✦ Prepare forms to be signed, including a confidentiality agreement, if necessary

Personnel Structure

- ✦ company organization
- ✦ special industry jargon
- ✦ specific work standards and procedures
- ✦ reporting relationships
- ✦ access to the supervisor (days, times, and duration)
- ✦ tasks that can be completed without supervisory approval
- ✦ work processing requests and timeliness
- ✦ email, mail and telephone systems
- ✦ approved form(s) for correspondence
- ✦ safety regulations
- ✦ procedure for signing off completed work
- ✦ periodic forms or reports to be completed
- ✦ security and confidentiality issues, if relevant
- ✦ acceptable dress and appearance
- ✦ maintaining the premises and work station
- ✦ productive interactions with others at the work site
- ✦ personnel who can answer different kinds of questions
- ✦ how the organization wants the intern to deal with clients, customers, and vendors

Means of Communicating Important Information

- ✦ take your interns on a tour of the facilities and introduce them to the other employees
- ✦ give your interns company materials to read such as newsletters, annual reports, an organization chart, or memos from the CEO
- ✦ encourage your interns to spend break and lunchtimes in places where employees gather
- ✦ schedule regular one-on-one meetings with them
- ✦ give the interns opportunities to observe (or participate in) professional meetings
- ✦ allow the interns to interview company personnel
- ✦ encourage the interns to walk around and observe others at work

One focal point of training that will benefit your organization and the student are professional (soft) skills. Each intern should be given a resource like the book, [*InternQube: Professional Skills for the Workplace*](#), available at InternQube.com.

The success of an internship depends on the partnership between representatives of the organization, the college, and the student. These three parties need to agree on the conditions of the internship, the responsibilities of each party, and the reporting requirements. The site supervisor is the critical link. You guide your interns by providing direction and feedback. If a problem occurs, you counsel the students and contact the campus supervisor, when necessary.

KEY POINTS

- ✦ Develop a thorough orientation and training plan to be implemented when the interns begin work, so they will learn quickly and become productive members of your team.
- ✦ Invest supervisory time to establish an important bond with interns and set a crucial tone for the internship experience.

NOTES

ORIENTATION CHECKLIST

Experience shows that employers who take adequate time at the beginning of the internship to orient the student reap productivity and effectiveness more quickly than those who don't.

Explain the Mission of the Organization

- ⊕ How did the organization start? Why?
- ⊕ What is unique about your product or service?
- ⊕ Who benefits from your product or service?
- ⊕ What are the organization's current objectives?
- ⊕ How may the intern contribute to those objectives?

Explain the Organization Structure

- ⊕ Who reports to whom?
- ⊕ Who, specifically, is the intern's supervisor?
- ⊕ What is the intern's department responsible for?
- ⊕ How are decisions made?
- ⊕ Which personnel can answer different kinds of questions?

Outline Organizational Rules, Policies, Decorum and Expectations

- ⊕ Is there special industry jargon?
- ⊕ What are the specific work standards and procedures?
- ⊕ What access to the supervisor (days, times, and duration) does the intern have?
- ⊕ How should they process requests?
- ⊕ How do the mail and telephone systems work?
- ⊕ What are the approved forms for correspondence?
- ⊕ By what safety regulations must they abide?
- ⊕ Is there a procedure for signing off completed work?
- ⊕ What periodic forms or reports need to be completed?
- ⊕ What local, state, and/or federal guidelines or laws apply to their work?
- ⊕ Are there security or confidentiality issues the intern should be aware of?
- ⊕ What is acceptable with regard to dress and appearance?
- ⊕ How should they maintain the premises and their work area?

Define the Intern's Responsibilities

- ⊕ What is the intern's role?
- ⊕ What projects will be assigned to him or her?
- ⊕ What resources are available to the intern?
- ⊕ What training is necessary?
- ⊕ How does the organization want the intern to deal with clients and vendors?
- ⊕ What tasks can be completed without supervisory approval?
- ⊕ Do other employees understand the intern's role?

Monitor the Intern's Adjustment and Understanding of What is Expected

- ⊕ Make yourself visibly available to the intern
- ⊕ Assign someone who can periodically "check-in" with the intern
- ⊕ Provide feedback and constructive criticism
- ⊕ Force the intern to ask questions

DEVELOPING WORK ACTIVITIES AND MEASURABLE LEARNING OBJECTIVES

A large part of producing effective position descriptions involves the development of challenging work assignments that complement students' academic programs. One way to do this is to design a preliminary list of work activities that will fit the needs of your department. A detailed description of typical tasks will help the college to promote your internship, and help you to screen the right candidates for the position. Later, when the interns you select join your team, you will have a chance to review the work activities and modify them according to the interns' knowledge and personal work/learning goals.

As part of the educational process, internship work activities should focus on projects specifically related to the academic major and the degree the interns expect to receive. Students who perform menial tasks will become quickly demoralized and will learn nothing about applying their expertise to a business environment. While many students work (or have worked) at part-time jobs to finance their education, an internship does not fall into the category of a job. It is actually part of their academic program and should offer every opportunity to link classroom learning to workplace experience.

Undergraduate students expect and appreciate clear direction regarding what is expected of them and frequent feedback concerning what and how they have done. Remember, in their academic environment, clear direction and periodic feedback is the way of life. It is also most important the interns perceive their work is making a useful contribution to the sponsoring organization.

A particular concern at the undergraduate level is that work assignments provide interns with a variety of tasks, while accommodating the needs of the organization. Of course, some of the interns' responsibilities will involve repetition, because all work involves some repeated activity. The program should be designed to maximize the scope of the students' organizational experience.

Sample Tasks

- ⊕ performing laboratory tests
- ⊕ writing handbooks or manuals
- ⊕ designing posters, charts, graphs
- ⊕ generating financial forecast and cost recovery reports
- ⊕ performing software/hardware modifications
- ⊕ conducting studies and surveys
- ⊕ developing presentations
- ⊕ compiling technical reports
- ⊕ creating social media sites
- ⊕ conducting research
- ⊕ generating marketing plans
- ⊕ conducting training packages
- ⊕ preparing budgets and financial reports

Developing challenging work assignments relative to the students' abilities should be a major thrust. The internship position description should incorporate the needs of your organization as well as the abilities and academic goals of the students you employ.

KEY POINTS

- ⊕ Describe challenging, but realistic tasks students can accomplish within a three-month period.
- ⊕ Work with faculty to establish specific learning objectives for students.
- ⊕ Identify outcomes or expected products.
- ⊕ Be willing to incorporate the students' particular strengths.
- ⊕ Show how this work relates to the overall efforts of the department or organization.

NOTES

SUPERVISING THE INTERN

As an intern supervisor, you use all the skills necessary in any effective supervisory relationship:

- ⊕ Providing leadership
- ⊕ Motivating
- ⊕ Delegating
- ⊕ Communicating
- ⊕ Developing and training
- ⊕ Evaluating

Additionally, the students will look to you as a mentor who will assist their transition from the classroom to the work environment. Since the internship is an extension of the learning process, you will need to provide opportunities to bridge the two experiences.

We suggest that you meet with your interns regularly to provide feedback concerning their performance. During these meetings, the students can:

- ⊕ report on the status of a project
- ⊕ ask questions
- ⊕ learn how their work is contributing to the organization
- ⊕ participate in an evaluation of their strengths
- ⊕ discuss areas needing growth and development
- ⊕ get a sense of what kind of work lies ahead

At the same time you will have an opportunity to coach, counsel and reinforce positive attitudes and performance.

You should anticipate that you will have some interaction with your students' campus internship coordinator through phone calls, email, on-site visits, and written evaluations. Such persons will help you find a solution if difficulties occur (intern attendance or punctuality problems, low motivation, unsatisfactory work, or personal conflicts). Also, you should get in touch with the college contact if the internship conditions must be altered - such as a change in supervisors, delays in the availability of data needed by the students to complete an assignment, a strike by unionized employees, transfer or termination of an employee involved in the interns' work, or other unanticipated changes.

Encourage your interns to keep a portfolio of work accomplished during the experience. This will help fulfill the students' academic requirements and provide them with a sense of accomplishment. In addition, it will give you a basis to discuss their professional growth. Specific work documents to include in a portfolio might be any of the following:

- ⊕ Job Descriptions
- ⊕ Legislation
- ⊕ Proposals
- ⊕ Manuals
- ⊕ Citations & Awards
- ⊕ Contracts
- ⊕ Program Outlines
- ⊕ Company Newsletters
- ⊕ Performance Appraisals
- ⊕ Charts/Graphs
- ⊕ Correspondence
- ⊕ Press Releases
- ⊕ Certificates
- ⊕ Research Reports
- ⊕ Financial Reports
- ⊕ Displays & Exhibits
- ⊕ References
- ⊕ Survey Reports
- ⊕ Cost Analyses
- ⊕ Marketing Plans
- ⊕ Blog/Social Content

In addition to spontaneous and informal meetings, you should use the form provided in this manual to evaluate the intern's performance at the midpoint of the internship, so the students know where they stand. You should consider the quality and timeliness of the work produced to date, ability to take and follow direction, work habits, and areas needing growth and development. This information will also provide data for the final evaluation and serve as a reference point for the students' subsequent performance.

KEY POINTS

- ✦ Maintain an open channel of communication with formal and informal meetings.
- ✦ Keep the interns busy and directed towards their learning objectives. Students rarely complain of overwork, but they do complain if they are not challenged.
- ✦ Provide opportunities for increasing responsibility.
- ✦ Encourage professionalism by assisting the interns in developing human relations skills, decision-making abilities, and managing office politics.
- ✦ Remember that you are a role model.
- ✦ Develop connections.

NOTES

EMPLOYER EVALUATION OF STUDENT INTERN

Student: _____ **Organization:** _____

- | | | |
|---|-----------------|--|
| 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) |

If any criteria are not applicable to this internship experience, please leave the response blank.

A. Ability to Learn

- | | | | | | | |
|----|---|---|---|---|---|---|
| 1. | Asks pertinent and purposeful questions | 1 | 2 | 3 | 4 | 5 |
| 2. | Seeks out and utilizes appropriate resources | 1 | 2 | 3 | 4 | 5 |
| 3. | Accepts responsibility for mistakes and learns from experiences | 1 | 2 | 3 | 4 | 5 |

B. Reading/Writing/Computation Skills

- | | | | | | | |
|----|---|---|---|---|---|---|
| 1. | Reads/comprehends/follows written materials | 1 | 2 | 3 | 4 | 5 |
| 2. | Communicates ideas and concepts clearly in writing | 1 | 2 | 3 | 4 | 5 |
| 3. | Works with mathematical procedures appropriate to the job | 1 | 2 | 3 | 4 | 5 |

C. Listening & Oral Communication Skills

- | | | | | | | |
|----|--|---|---|---|---|---|
| 1. | Listens to others in an active and attentive manner | 1 | 2 | 3 | 4 | 5 |
| 2. | Effectively participates in meetings or group settings | 1 | 2 | 3 | 4 | 5 |
| 3. | Demonstrates effective verbal communication skills | 1 | 2 | 3 | 4 | 5 |

D. Creative Thinking & Problem Solving Skills

- | | | | | | | |
|----|---|---|---|---|---|---|
| 1. | Breaks down complex tasks/problems into manageable pieces | 1 | 2 | 3 | 4 | 5 |
| 2. | Brainstorms/develops options and ideas | 1 | 2 | 3 | 4 | 5 |
| 3. | Demonstrates an analytical capacity | 1 | 2 | 3 | 4 | 5 |

E. Professional & Career Development Skills

- | | | | | | | |
|----|--|---|---|---|---|---|
| 1. | Exhibits self-motivated approach to work | 1 | 2 | 3 | 4 | 5 |
| 2. | Demonstrates ability to set appropriate priorities/goals | 1 | 2 | 3 | 4 | 5 |
| 3. | Exhibits professional behavior and attitude | 1 | 2 | 3 | 4 | 5 |

F. Interpersonal & Teamwork Skills

- | | | | | | | |
|----|--|---|---|---|---|---|
| 1. | Manages and resolves conflict in an effective manner | 1 | 2 | 3 | 4 | 5 |
| 2. | Supports and contributes to a team atmosphere | 1 | 2 | 3 | 4 | 5 |
| 3. | Demonstrates assertive but appropriate behavior | 1 | 2 | 3 | 4 | 5 |

G. Organizational Effectiveness Skills

- 1. Seeks to understand and support the organization’s mission/goals 1 2 3 4 5
- 2. Fits in with the norms and expectations of the organization 1 2 3 4 5
- 3. Works within appropriate authority and decision-making channels 1 2 3 4 5

H. Basic Work Habits

- 1. Reports to work as scheduled and on-time 1 2 3 4 5
- 2. Exhibits a positive and constructive attitude 1 2 3 4 5
- 3. Dress and appearance are appropriate for this organization 1 2 3 4 5

I. Character Attributes

- 1. Brings a sense of values and integrity to the job 1 2 3 4 5
- 2. Behaves in an ethical manner 1 2 3 4 5
- 3. Respects the diversity (religious/cultural/ethnic) of co-workers 1 2 3 4 5

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.

K. Comments:

L. Overall Performance (if I were to rate the intern at the present time)

	Unsatisfactory	Poor	Average			Good	Outstanding				
	0	1	2	3	4	5	6	7	8	9	10
	(F	D	D+	C-	C	C+	B-	B	B+	A-	A)

This assessment was reviewed with the intern on (Month/Day/Year) _____.

Evaluator’s Signature: _____

Date: _____

Title/Position: _____

Telephone: _____

STUDENT EVALUATION OF INTERNSHIP

Please respond to the following questions regarding your internship experience.
This form provides opportunity for frank appraisal of your internship site and supervisor.

Your Name: _____ Date: _____

Organization: _____ Semester/Year: _____

Location: _____ Supervisor: _____

Please rate the following aspects of your internship experience on the basis of this scale:

(1) Poor (2) Fair (3) Good (4) Excellent

Site

Physical environment was safe	1	2	3	4
An orientation was provided to the organization	1	2	3	4
Adequate resources were available to accomplish projects	1	2	3	4
Co-workers were accepting and helpful	1	2	3	4

Supervisor

Supervisor provided a clear job description	1	2	3	4
Regular feedback was provided on my progress and abilities	1	2	3	4
An effort was made to make it a learning experience for me	1	2	3	4
Supervisor provided levels of responsibility consistent with my abilities	1	2	3	4
Supervisor was supportive of the agreed-upon work days and hours	1	2	3	4

Learning Experience

Work experience related to my academic discipline and/or career goal	1	2	3	4
Opportunities were provided to develop my communication skills	1	2	3	4
Opportunities were provided to develop my interpersonal skills	1	2	3	4
Opportunities were provided to develop my creativity	1	2	3	4
Opportunities were provided to develop my problem-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 here (use other side if necessary)

Would you work for this supervisor again? ___ Yes ___ No ___ Uncertain

Would you work for this organization again? ___ Yes ___ No ___ Uncertain

Would you recommend this organization to other students? ___ Yes ___ No ___ Uncertain

RESOURCES

DEVELOPING STUDENTS INTO PROFESSIONALS

[InternQube: Professional Skills for the Workplace](#) is an excellent starter guide to help students develop to a new level of professionalism. More information may be found at [InternQube.com](#) .

EMPLOYER TOOLS

Excellent resources to help employers set up and effectively manage internship programs may be found at [internbridge.com](#) and [thincinterns.com](#)

PROFESSIONAL ORGANIZATIONS

National, member organizations can offer assistance. The following organizations, and their regional and/or statewide affiliates, should be consulted.

Cooperative Education and Internship Association (CEIA) - [ceiainc.org](#)

National Association of Colleges and Employers (NACE) - [naceweb.org](#)

National Society for Experiential Education (NSEE) - [nsee.org](#)

APPENDIX 1 – “HOLD HARMLESS” AGREEMENTS
STATEMENT OF PRINCIPLES REGARDING RELEASE AND INDEMNITY AGREEMENTS

Approved by the Board of the Cooperative Education and Internship Association (CEIA) -Jan. 2003

The Cooperative Education and Internship Association (CEIA) encourages the following for their members with regard to requests by site sponsors for institutional Indemnity and Student Release Agreements.

Background

In recent years, site sponsors have grown concerned about the liability they may encounter by hosting student co-ops or interns. Because of this growing concern, some site sponsors have sought to have colleges/universities sign agreements, which would require the student co-op/intern to release the site sponsor from liability and require the educational institution to indemnify the site sponsor from liability, while hosting a student co-op/intern.

These agreements, sometimes referred to as Hold Harmless Agreements, not only preclude a claim against the site sponsor by the participating student, but also require the college/university to pay any expenses, damages, or claims arising out of the internship arrangement such as claims made by the student co-op/intern (or a person injured by the student co-op/intern) against the site sponsor. In extreme cases these agreements have stated the college/university will cover the site sponsor even when the claim has arisen as a result of site sponsor negligence. Appropriately, colleges/universities have balked at signing such agreements. Indeed, colleges/universities should avoid signing these types of agreements that are unfair and one-sided.

Conduct of Parties

Members of CEIA should conduct themselves in a professional manner in all dealings with the represented parties in a work-integrated learning experience such as a co-op or internship.

As a principle of fundamental fairness, we urge all parties to bear responsibility for their own actions, including negligence, should that occur.

To avoid jeopardizing a potential co-op/internship experience, site sponsors should keep the appropriate college/university co-op/internship personnel informed of available opportunities. They should also, in a timely manner, inform the appropriate college/university personnel of their intentions to host a student co-op/intern. Colleges/universities must have sufficient time to consider approval of work-integrated learning experiences that have been arranged with, or without, the assistance of personnel and/or resources of the college/university.

The college/university and the site sponsor should provide access to appropriate work/learning experiences in safe environments, where the students will have adequate supervision and the necessary tools and equipment to perform the work required. The students' work will be rewarded with agreed upon compensation, if any, and agreed upon academic rewards.

The student must be aware of the fact that each chosen career field has established a set of general standards that speak to the professional conduct of people engaged in work within that occupation. It is the student's responsibility to fully understand, and abide by, those

professional standards of conduct, as well as those established by their site sponsor, and any standards established by their college or university.

The site sponsor and college/university should carry appropriate insurance, including policies mandated by federal, state, and local law. These include, but are not necessarily limited to general liability, professional liability, and worker's compensation insurance.

In allocating the risk of loss as between participating entities, a core question each party should ask is, "Who is receiving the greatest benefit from this co-op or internship?" Each should also ask, "Who is in the best position to control and insure against possible risks?"

All agreements should delineate the rights and responsibilities of the parties involved.

APPENDIX 2 – SAMPLE MEMO OF UNDERSTANDING

Sample Guidelines

A sample memo of understanding between the college/university and the site sponsor follows. It focuses not on risk allocation, but agreement on responsibilities. This document must be reviewed, and modified as necessary, by attorneys from the respective parties, prior to the implementation of the work-integrated learning experience.

MEMO OF UNDERSTANDING

I. Purpose. The College Co-op/Internship Program provides an educational strategy whereby students complement their academic preparation with direct practical experience. The effort to combine a productive work experience with an intentional learning component is a proven method for promoting the academic, personal, and career development of students. Your participation exhibits your interest and commitment to this educational strategy and to the growth and development of students as future professionals. We look forward to collaborating with you in this work/learning endeavor.

II. Responsibilities. To help insure the interests and promote the benefits of a co-op/internship arrangement for all parties involved, the College has developed this memorandum of understanding to describe the mutual responsibilities between the College and your organization: _____ hereafter named as Site Sponsor.

A. Responsibilities of the College/University

1. Encourage the student's productive contribution to the overall mission of the Site Sponsor;
2. Certify the student's academic eligibility to participate in an internship assignment;
3. Establish guidelines and standards for the conduct of its co-op/internship program and to make these guidelines and standards available to the Site Sponsor;
4. Designate a faculty member to serve as advisor to the student with responsibilities to assist in setting learning objectives, to confer with Site Sponsor personnel, to monitor the progress of the internship assignment, and to evaluate the academic performance of the student.
5. Maintain communication with the Site Sponsor and clarify College policies and procedures;
6. Maintain the confidentiality of any information designated by the Site Sponsor as confidential;
7. Provide general liability insurance, and such professional liability insurance as may be reasonably required, for each participating student and faculty member.
8. Enforce any additional rules and procedures that are mutually agreed upon in advance in writing between the College and the Site Sponsor.

B. Responsibilities of the Site Sponsor

1. Encourage and support the learning aspect of the student's co-op/internship assignment;
2. Designate an employee to serve as student advisor with responsibilities to help orient the student to the site and its culture, to assist in the development of

learning objectives, to confer regularly with the student and his/her faculty representative, and to monitor progress of the student;

3. Provide adequate supervision for the student and to assign duties that are career-related, progressive and challenging;
4. Make available equipment, supplies, and space necessary for the student to perform his/her duties;
5. Provide a safe working environment;
6. Will not displace regular workers with students secured through co-op/internship referral;
7. Notify College personnel of any changes in the student's work status, schedule, or performance;
8. Allow a faculty representative to visit the work site to confer with the student and his/her supervisor;
9. Communicate Site Sponsor policies and standards to College personnel.
10. Maintain general liability, professional liability and worker's compensation insurance as required by law.

III. Terms of Co-op/Internship Arrangement. A co-op/internship arrangement for each student will be a period agreed upon by the Site Sponsor and the College. Should the Site Sponsor become dissatisfied with the performance of a student, the Site Sponsor may request termination of the co-op/internship arrangement. This should occur only after College personnel have been notified in advance and a satisfactory resolution cannot be obtained. Conversely, the College may request termination of the arrangement for any student not complying with College guidelines and procedures for the co-op/internship program, or if the Site Sponsor does not uphold the responsibilities mentioned above, as long as Site Sponsor personnel have been notified in advance and satisfactory resolution cannot be obtained.

IV. Duration of Agreement. This memorandum of understanding shall continue in effect from _____ to _____ .

Any questions regarding the co-op/internship program, its procedures, or this memorandum should be referred to:

Site Sponsor Representative: _____ Date: _____

College Representative: _____ Date: _____

APPENDIX 3 – HIPAA REGULATIONS AND INTERNS

The Health Insurance Portability and Accountability Act (HIPAA) has certain regulations which went into effect around April 15, 2003. Some site sponsors view educational institutions as a "business associate," which makes it untenable for schools to continue working with them.

Site sponsors need to be aware of the following:

Student interns and clinical placements are part of a covered entity's "workforce" as defined in 45 CFR 160.103. Neither they nor the college can be a "business associate" of a site, because they are not engaged in performing, or assisting the site in performing, any of the "business associate" functions listed in the CFR section cited above. This is explained very helpfully in a document published by the Department of Health and Human Services at:

<http://www.hhs.gov/ocr/privacy/hipaa/understanding/coveredentities/businessassociates.html>