PROPOSAL FOR UNDERGRADUATE INTERNSHIP COURSE DESIGNATION APPROVAL
Internship (N)

OVERVIEW

Defining Internship Courses
For a course to be designated as "Undergraduate Internship", it must meet all of the following criteria. Criteria are based on internship best practices as defined by the National Association of Colleges and Employers (NACE), the CAS Standards for Internships (2015) and the Department of Labor's Fair Labor Standards Act (FLSA). All included internship sites must abide by Department of Labor Fair Standards Labor Act on Internships (see Appendix B), NACE Position Statement on Internships (see Appendix C), or other applicable accrediting body standards.

Definition: An internship is a form of experiential learning that integrates knowledge and theory learned in the classroom with practical application and skills development in a professional setting. Internships give students the opportunity to gain valuable applied experience and make connections in professional fields they are considering for career paths; and give employers the opportunity to guide and evaluate talent. – NACE

1. The internship course engages students in an experience in a professional or organizational setting performing work that is applicable to their fields of study, educational goals and/or career aspirations, and can be transferrable to other employment or academic settings.
2. The internship course requires students to conduct professionally applicable work within a defined period of time; required number of hours for course credit/per credit hour* received is clearly articulated.
3. The learning objectives** related to the internship course are clearly articulated and are relevant to competencies in the field of study and/or career readiness competencies (see Appendix A).
4. The internship course requires routine supervision and feedback by a professional with expertise related to the field of study, educational goals and/or career and vocational aspirations.
5. The course integrates assignments for self-assessment, reflection, application, and integration of the learning experience as it relates to career/academic decision-making and personal and professional development. Includes a combination of reflection assignments, evaluations, and a final synthesis project.
6. The internship course requires a formal learning agreement (see Appendix D) to be signed by the student, internship site supervisor and university representative outlining the goals and objectives, rights and responsibilities, contact information, and the internship job description.

* Number of hours are determined by the extent to which the student is engaged in work activities related to identified learning goals (not solely hours at site or hours that solely benefit the employer/organization). UT semester credit hours earned in courses such as internships, research, theses, dissertation, etc. are based on outcome expectations established by the academic program.

**These are the same for all students in the course and should not be confused with the individual goals and objectives of each student and their internship site.

Process for Review
1.) All courses submitted for EL-designations are considered new courses in the Undergraduate Catalog, regardless of whether the base course is new or existing. Prior to final submission to the EL subcommittees for review, proposals must be approved through standard curricular procedure at the department and college levels. Those wishing to submit proposals for designation are encouraged to work with the Center for Career Development prior to final submission to ensure criteria are properly addressed.
2.) Proposals must be submitted by the designated college representative to Molly Sullivan by October 15 each year for consideration of inclusion in the following year's catalogue. (Microsoft Word or PDF file).
3.) The following rubric will be used to determine if courses meet the six criteria for consideration. A score of 9 or greater is required to receive the designation, with no entries in the (0) 'Does Not Demonstrate' column. Courses that receive the N-designation will become eligible to receive support through the campus’s Quality Enhancement Plan (QEP), Experience Learning.
**PROPOSAL FOR UNDERGRADUATE INTERNSHIP COURSE DESIGNATION APPROVAL**

**Internship (N)**

**RUBRIC**


<table>
<thead>
<tr>
<th>Completely Demonstrates (2)</th>
<th>Somewhat Demonstrates (1)</th>
<th>Does Not Demonstrate (0)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Professional Work as an Extension of the Classroom</strong></td>
<td>The internship course engages students in an experience in a professional or organizational setting performing university-level work that is applicable to their fields of study, educational goals, and/or career aspirations and can be transferrable to future employment settings.</td>
<td>The internship course engages students in an experience performing university-level work for an employer that is applicable and transferrable, but the work is primarily done in the classroom or in a &quot;virtual&quot; setting rather than in the professional/organizational setting.</td>
</tr>
<tr>
<td><strong>Time Towards Internship</strong></td>
<td>The internship course requires students to conduct professionally applicable work within a defined period of time; required number of hours for course credit/ per credit hour* received is clearly articulated.</td>
<td>Students conduct internship work within a defined period of time, but there is ambiguity regarding minimum hours required for course credit/ per credit hour.</td>
</tr>
<tr>
<td><strong>Learning Objectives</strong></td>
<td>The learning objectives related to the internship course are clearly articulated and are relevant to competencies in the field of study and/or career readiness.</td>
<td>The learning objectives related to the internship experience are limited in their relationship to field of study or career readiness competencies.</td>
</tr>
<tr>
<td><strong>Supervision</strong></td>
<td>The internship course requires routine supervision and feedback by a professional with expertise related to the field of study, educational goals, and/or career and vocational aspirations.</td>
<td>Supervision and feedback is required but with ambiguity regarding who may provide the supervision and the consistency of the supervision.</td>
</tr>
<tr>
<td><strong>Course Integration</strong></td>
<td>The course integrates assignments for self-assessment, reflection, application, and integration of the learning experience. Includes a combination of reflection assignments, evaluations, and a final synthesis project.</td>
<td>The syllabus assignments include evaluations for student but does not include reflection assignments or a final synthesis project.</td>
</tr>
<tr>
<td><strong>Learning Agreement</strong></td>
<td>The internship course utilizes a formal learning agreement to be signed by the student, internship site supervisor and university representative thoroughly outlining the goals and objectives, rights and responsibilities, contact information, and internship description.</td>
<td>The internship course utilizes a formal learning agreement to be signed by the student, internship site supervisor and university representative but with only a limited outline.</td>
</tr>
</tbody>
</table>
PROPOSAL FOR UNDERGRADUATE INTERNSHIP COURSE DESIGNATION APPROVAL
Internship (N)

APPLICATION

Proposal Contact Information
Contact Name:
Contact Email:
College and Department:

Course Information
Is the base course new or existing?
Has the proposed EL designated course been approved through standard curricular procedure at the department and college level (a requirement of both new and existing base courses seeking EL designation)?

Course #:
Course Title:
Course Description:
# Credit Hours:
Time Expected per Student on Internship: (in total hours and/or per credit hour received)

Eligibility
a) What method(s) will be used to evaluate the eligibility of the student participant and internship site?

b) Please include a statement that indicates how it will be determined that a proposed internship site meets the FLSA on Internships (see Appendix B), the NACE Position Statement on Internships (see Appendix C) or other applicable accrediting body standards for internships in the field of study or career discipline. *Note: you may refer to your proposed learning agreement if it includes and clearly labels the necessary components of the rubric (Appendix D)*

Student Learning Outcomes
a) Please define one or more intended student learning outcomes to be advanced through the use of undergraduate internship in this course.

b) What method(s) will be used to evaluate the extent to which the intended student learning outcomes were advanced through the use of undergraduate internship in this course? *Note: you may refer to your syllabus if outcomes and evaluation methods are clearly articulated and labeled.*

Additional Information (optional)
Provide any additional information supporting why the course should be considered for N-designation and how the course meets the six criteria for inclusion.

Review the attached rubric. A score of 9 or greater, with no entries in the (0) ‘Does Not Demonstrate’ column, is required by the subcommittee to receive the designation. It is encouraged that you review the criteria to ensure they are properly addressed before final submission. You may reach out to the Center for Career Development prior to submission for guidance.

Required Attachments
Proposed course syllabus including a learning agreement.
Career readiness of college graduates is of critical importance in higher education, in the labor market, and in the public arena. Yet, up until now, “career readiness” has been undefined, making it difficult for leaders in higher education, workforce development, and public policy to work together effectively to ensure the career readiness of today’s graduates.

In accordance with its mission to lead the community focused on the employment of the new college graduate, the National Association of Colleges and Employers (NACE), through a task force comprised of representatives from both the higher education and corporate sides, has developed a definition and identified competencies associated with career readiness for the new college graduate.

**COMPETENCIES:**

**Critical Thinking/Problem Solving:** Exercise sound reasoning to analyze issues, make decisions, and overcome problems. The individual is able to obtain, interpret, and use knowledge, facts, and data in this process, and may demonstrate originality and inventiveness.

**Oral/Written Communications:** Articulate thoughts and ideas clearly and effectively in written and oral forms to persons inside and outside of the organization. The individual has public speaking skills; is able to express ideas to others; and can write/edit memos, letters, and complex technical reports clearly and effectively.

**Teamwork/Collaboration:** Build collaborative relationships with colleagues and customers representing diverse cultures, races, ages, genders, religions, lifestyles, and viewpoints. The individual is able to work within a team structure, and can negotiate and manage conflict.

**Digital Technology:** Leverage existing digital technologies ethically and efficiently to solve problems, complete tasks, and accomplish goals. The individual demonstrates effective adaptability to new and emerging technologies.

**Leadership:** Leverage the strengths of others to achieve common goals, and use interpersonal skills to coach and develop others. The individual is able to assess and manage his/her emotions and those of others; use empathetic skills to guide and motivate; and organize, prioritize, and delegate work.

**Professionalism/Work Ethic:** Demonstrate personal accountability and effective work habits, e.g., punctuality, working productively with others, and time workload management, and understand the impact of non-verbal communication on professional work image. The individual demonstrates integrity and ethical behavior, acts responsibly with the interests of the larger community in mind, and is able to learn from his/her mistakes.

**Career Management:** Identify and articulate one’s skills, strengths, knowledge, and experiences relevant to the position desired and career goals, and identify areas necessary for professional growth. The individual is able to navigate and explore job options, understands and can take the steps necessary to pursue opportunities, and understands how to self-advocate for opportunities in the workplace.

**Global/Intercultural Fluency:** Value, respect, and learn from diverse cultures, races, ages, genders, sexual orientations, and religions. The individual demonstrates openness, inclusiveness, sensitivity, and the ability to interact respectfully with all people and understand individuals’ differences.
USING THE DEFINITION AND COMPETENCIES
How do the definition and competencies help those focused on ensuring new college graduates have the skills necessary to enter and become part of a strong, productive work force?

The definition and competencies provide for development of strategies and tactics that will close the gap between higher education and the world of work. They lay the foundation for the work necessary to prepare college students for successful entry into the work force by:

- Providing a common vocabulary and framework to use when discussing career readiness metrics on campus, within employing organizations, and as part of national public policy.
- Establishing defined competencies as guidelines when educating and advising students.
- Establishing defined competencies to identify and assess when hiring the college educated.

NOW AVAILABLE: CAREER READINESS RESOURCES
NACE members have generously shared a variety of resources designed to support your efforts in integrating career readiness into your programs and services. You can access those materials and measurements at www.naceweb.org/career-readiness/competencies/career-readiness-resources.
APPENDIX B

Position Statement: U.S. Internships

A Definition and Criteria to Assess Opportunities and Determine the Implications for Compensation

ABSTRACT

Experiences through which students can apply their academic knowledge in work settings are a vital component of a college education. These experiences are widely labeled as "internships," but the criteria for and oversight of these experiences vary widely among institutions of higher education and employers in the United States. This paper examines the characteristics of a legitimate internship and the conditions under which such an experience can be engaged on an unpaid basis. At the foundation of this paper is the tenet that an internship is a legitimate learning experience benefitting the student and not simply an operational work experience that just happens to be conducted by a student.

Overview of Current Perspectives for Experiential Learning Experiences

Experiential learning is a crucial component of a college education. Experiential learning encompasses a wide variety of enriching opportunities for students, including service-learning, volunteering, student organization leadership and campus involvement, faculty-led research and projects, experiential study-abroad, student employment/work-study, cooperative education, and internships. This position paper concerns itself specifically with internships.

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

In 2010, the National Association of Colleges and Employers (NACE) issued a position statement on unpaid internships that was developed after conducting a national survey of employer and college members and considering other related research. It is framed by principles, beliefs, assumptions, and information that took into consideration the numerous and varying current practices. NACE has developed a framework within which to define the internship experience and identify criteria for determining when internships can be offered ethically and legitimately without pay.

Definition of “Internship” and Consistent Criteria

Because the parties involved in the internship process—students, colleges and universities, and employers—have differing objectives, it is important to have a definition of “internship” upon which all parties can agree. Currently, the term “internship” is used to describe various experiences. Moreover, there are no guidelines by which employers, educators, and students can consistently define “internships.”

To establish uniformity in the use and application of the term “internship,” NACE recommends the following definition:

An internship is a form of experiential learning that integrates knowledge and theory learned in the classroom with practical application and skills development in a professional setting. Internships give students the opportunity to gain valuable applied experience and make connections in professional fields they are considering for career paths; and give employers the opportunity to guide and evaluate talent.

To effectively implement this definition, it is necessary to develop criteria that college career centers and employer recruiters can use to identify workplace experiences that can legitimately be identified as “internships." The discussion of these criteria is framed by several conditions. These conditions are the legal definitions set by the Fair Labor Standards Act (FLSA); the widely varying guidelines set by individual educational institutions and academic departments within institutions; employer perspectives on and objectives for internships; and the unique experiential learning objectives of students.

Students pursue internships because they want to gain professional experience that links their academic coursework to the disciplines they want to pursue for their careers. To gain this experience, students want to engage in projects and tasks that contribute to the professional work of the organization. This means that the employer does benefit from the work of the intern while, at the same time, it provides a meaningful experience that allows for the application of academic knowledge.

To advance this assessment, the ethics must be considered. At the foundation of such an assessment is the tenet that the internship is a legitimate learning experience benefitting the student and not simply an operational work experience that just happens to be conducted by a student. The core question then is whether or not work performed by an intern will primarily benefit the employer in a way that does not also advance the education of the student.
In January 2018, the U.S. Department of Labor (DOL) issued a statement essentially replacing the six-part test it had initially issued in 2010 with its new “primary beneficiary” test to determine if an individual can be classified as an unpaid intern.

The primary beneficiary test does not include a rigid set of requirements; instead, it is a non-exhaustive list of factors to determine who is the primary beneficiary of the internship. These factors include:

- the extent to which the intern and the employer clearly understand that there is no expectation of compensation;
- 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 an educational institution;
- the extent to which the internship is tied to the intern’s formal education program by integrated coursework or the receipt of academic credit;
- the extent to which the internship accommodates the intern’s academic commitments by corresponding to the academic calendar;
- the extent to which the internship’s duration is limited to the period in which the internship provides the intern with beneficial learning;
- 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; and
- 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.

The DOL’s fact sheet on unpaid internships (Fact Sheet #71: Internship Programs Under the Fair Labor Standards Act) explains that 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. The fact sheet also indicates that courts have described the primary beneficiary test as “flexible” with no single factor being determinative. Therefore, whether an intern or student is an employee under the FLSA depends on the unique circumstances of each case.

The DOL says that if examination of these circumstances reveals that an intern or student is an employee, then he or she is entitled to both minimum wage and overtime pay under the FLSA. However, if the analysis of the circumstances 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.

Criteria for an Experience to Be Defined as an Internship

To ensure that an experience—whether it is a traditional internship or one conducted remotely or virtually—is educational, and thus eligible to be considered a legitimate internship by the NACE definition, all the following criteria must be met:

1. The experience must be an extension of the classroom: a learning experience that provides for applying the knowledge gained in the classroom. It must not be simply to advance the operations of the employer or be the work that a regular employee would routinely perform.
2. The skills or knowledge learned must be transferable to other employment settings.
3. The experience has a defined beginning and end, and a job description with desired qualifications.
4. There are clearly defined learning objectives/goals related to the professional goals of the student’s academic coursework.
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.

If these criteria are followed, it is the opinion of NACE that the experience can be considered a legitimate internship.

Posting Unpaid Internships

Career services professionals should monitor positions posted through their career centers to see that they follow the NACE definition and criteria articulated in this paper. This is particularly important for unpaid internships, as allowing an unpaid internship to be posted implies approval of the internship. Therefore, career centers should not post any unpaid internships that do not meet the seven criteria set forth above.

Academic Credit

While academic credit legitimizes an unpaid experience, in order to be identified as an internship, that experience must fit the criteria. For experiences that employers make available only if academic credit is awarded, the college or university’s requirements in combination with the criteria laid out in this paper should be used to determine if the experience is a legitimate internship.
Conclusion

This paper examines how to assess experiences often promoted to students as “internships” with the goal of determining the implications for compensation by exploring three components:

- The experience’s legitimacy as an internship must be determined. To do so, the educational value of the experience must be considered of most importance.
- Once the experience can be ethically identified as an internship, the implications for compensation can be determined. An experience that meets all the criteria may be offered unpaid.
- Only an experience that meets the criteria presented in this paper should be labeled an internship.

It is the considered opinion of NACE that career services professionals and employment professionals can work collaboratively to ensure that an experience meets and adheres to the criteria so that it can be legitimately considered an internship. In this way, valuable experiential learning can be ethically provided for students.

July 2011. Revised August 2018 to reflect the replacement of the FLSA six-part test with the "primary beneficiary" test.
APPENDIX C

U.S. Department of Labor
Wage and Hour Division

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.² In 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.

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.

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](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).

U.S. Department of Labor
Frances Perkins Building
200 Constitution Avenue, NW
Washington, DC 20210

1-866-4-USWAGE
TTY: 1-866-487-9243
APPENDIX D

Guide for Developing the Learning Agreement

The learning agreement is between the supervisor and students as well as the internship coordinator due to credit being earned. It is typically comprised of four parts: goals & objectives, rights & responsibilities, a contact sheet and an agreement clause with space for signatures. Explanations are provided below with suggested included information.

Contact Sheet

- The contact sheet with the agreement signature contains the following:
  - Employer/Supervisor name, title, address, email, telephone number
  - Intern name, email, telephone number
  - Internship start and end dates
  - Internship hours: daily/weekly schedule, hours per week, total in internship
  - Number of credits the interns will be earning
  - Payment terms or other compensation means, if applicable. Demonstrates how the employer meets the DOL-FLSA rules if unpaid and “for-profit”.
- Includes statement indicating that the intern and /or employer must notify the university representative (internship course instructor) if there is a change in status.
- Indicates the preferred method of communication with the internship course instructor.

Rights and Responsibilities

Student Rights and Responsibilities

- Pursue a meaningful work experience related to a student’s major and/or career goals.
- Expect to be treated fairly and with respect by all staff at site.
- Discuss insurance/liability with the employer, including how the intern is protected in case of a legal or medical situation at the internship site.
- Complete tasks assigned by supervisor or designee.
- Treat others with respect at all times.
- Recognize that there are confidential situations and interns may be asked to sign a confidentiality clause document.
- Follow University of TN Hill Topics.
- Create Goals and Objectives Sheet to define role in the internship and review with supervisor on a regular basis.
- Remain in contact with the Internship Course Instructor throughout the internship and complete all required assignments to receive credit.

Employer Rights and Responsibilities

- Provide a complete description of intern’s responsibilities.
- Offer an orientation to introduce student to work culture.
- Provide information on harassment and discrimination policies.
- Explain office etiquette, behaviors, attire, meals, timeliness, work location, parking, overall facility, and general rules of organization.
- Explain supervisor’s preferred communication methods.
- Provide a meaningful internship experience for the student guided by identified and agreed upon goals and objectives.
- Assign no more than 25% clerical or menial style tasks that are not dependent on one earning a college degree to do.
- Discuss termination procedures with student and internship course instructor.
- Avoid involving student in any situation that has illegal components for the intern.
- Remain accessible to the Internship Course Instructor throughout the experience.
- Evaluate the intern as often as needed but at least as often as required by the course.

Goals and Objectives

- The internship exists for the student to learn, and all objectives are to revolve around the idea that the intern should learn about self, organization and industry.
- The intern should discuss the answers to each of the following questions with their supervisor:
  - What skills do you want to develop as you are working on your internship?
  - How do you plan to accomplish this skill development? What are specific actions, tasks, and work assignments that will allow you to achieve your objective?
  - How will you be evaluated on skill development?

Agreement Clause

- Include statements such as these below:
  - The employer agrees to information stated in the Learning Agreement and will adhere to all stated policies. The student agrees to abide by all guidelines set forth in the Learning Agreement.
- Signed and dated by all parties