

IDS 3947: Exploratory Internship Course

Policy on Allowable Experiences

I. Criteria for an Experience to Be Defined as an Internship

To ensure that an experience is educational and eligible to be considered a legitimate internship the following criteria must be met:

1. The experience must be a learning experience that provides for applying knowledge gained in the classroom.
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.
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.

II. Unpaid Internships

If the experience is unpaid, the experience must pass the 2018 US Department of Labor's "primary beneficiary" test. This includes a list of factors to determine who is the primary beneficiary of the internship:

- 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.

III. Credit Options

IDS 3947 is a variable credit course open to all majors. Students may enroll in 0 to 6 credits, and the course may be repeated for a maximum of 6 credits. The course is graded on an S/U scale, and the credits serve as elective credits that do not count towards the [excess credit hour threshold](#).

A minimum of 45 work hours per semester (or enrollment period) is required for each credit hour of enrollment:

- 0 or 1 credit = minimum 45 work hours per semester
- 2 credits = 90 work hours
- 3 credits = 135 work hours
- 4 credits = 180 work hours
- 5 credits = 225 work hours
- 6 credits = 270 work hours

A permit is required to enroll in IDS 3947, and the internship offer letter or other description of the internship experience is needed before the permit can be granted.