

Internships

AA102

Last Reviewed: November 2022

I. Intent

Experiential learning can provide students with insight to their chosen field of study and serves to enhance and illustrate principles learned in the classroom. UCLA Extension organizes internships as credit or non-credit-bearing courses where students engage in experiential learning and practical workplace experiences. This policy establishes requirements and academic standards for Extension's internship program and stipulates roles and responsibilities to ensure learning outcomes and compliance with applicable laws.

II. Definitions

- **Curricular Practical Training (CPT):** For international students, CPT is defined as an authorization that allows for “alternative work/study, internship, cooperative education or any other type of required practicum that is offered by sponsoring employers through cooperative agreements with a school.” In accordance with federal regulation, CPT is only available when it is an integral part of an established curriculum, i.e. an opportunity must be required by the curriculum or, if not required, the student must receive credit for the training [cf. 8 Code of Federal Regulations 214.2 (f)(10)(i)].
- **Internship:** An internship is a form of experiential learning that integrates knowledge and theory learned in a class with practical application and skills development in a professional setting. As a structured and supervised learning and professional experience, the internship is guided by learning goals and supervised by both academic and host company personnel. Internship courses have an approved syllabus that includes learning objectives and course requirements. Internships may offer academic credit (400 level) or continuing education credit (800 level CEU).
- **Internship Agreement:** The Extension internship agreement is required for all internships and constitutes a formal agreement between the Student, the internship host company, and UCLA Extension. Internship agreements outline the terms and conditions for the internship as well as requirements for paid or unpaid internships, unit credit, and hours.
- **Optional Practical Training (OPT):** For international students, OPT is defined as post-graduation work/training that is directly related to the student's major area of study. OPT is regulated and approved by the U.S. Citizenship and Immigration Service (CIS). UCLA Extension assists international students in the application process for OPT but does not determine a student's eligibility for OPT. International student eligibility for OPT is determined by the DHS.

- **Student:** Any individual, international or domestic, who is enrolled in a certificate program offered by UCLA Extension and for whom UCLA Extension maintains student records.

III. Policy Statement

A. Curriculum Rules

Through experiential learning, internships allow students to integrate what they have learned in the classroom with practical application. To this purpose and when meeting the criteria stated herein, candidates in certificate programs or specialization programs may participate in an internship when they are an approved part of the curricula. Extension Program Directors/Continuing Educators (PD/CE) determine if a certificate program curriculum will include internships.

PD/CEs and delegated staff are responsible for ensuring that internship opportunities proposed by partnering Host Companies will provide a meaningful and relevant learning experience for UCLA Extension students. To guard against labor exploitation, internships are not mandatory for the completion of a certificate program but may be deemed a requirement for program completion when the internship serves as practicum or placement for required licensure or credentialing. Accordingly, a governing or licensing agency of the State of California or a U.S. Department of Education approved accrediting agency may require practical training which may be fulfilled by an internship.

B. Internship Course Setup

An internship shall be organized either as a credit-bearing course (400-level); or as a non-credit CEU-bearing course (800-level); or in the case of the Pathway program, as a non-credit/graded life-skills activity course (900-level).

1. Internships as 400-level Courses

- If organized to yield 400-level credit, in the case where a Host Company's representative oversees and evaluates the student's work they must be identified as the primary instructor-of-record and must be formally approved to teach the course.
- An approved instructor who conducts an approved course organized as an internship class *about* a work experience that is concurrently underway, with exercises such as group presentations, outside readings or submission of a paper or final examination, can be identified as the primary instructor-of-record instead of the Host Company's representative.

- It is not permitted for an approved instructor to file grades who does not directly oversee students' work and who acts solely as the *proxy* of an unapproved Host Company representative.
- The unit valuation of a credit-bearing internship shall be reckoned at 1 unit for every 3 hours of work per week assuming an 11-week term; or a minimum of 33 hours per unit. If the class has no organized meetings other than the work-place attendance, the intern will be enrolled in a class section with a unit valuation generally commensurate with the hours declared in the *Internship Agreement*.

2. Internships as 800-level Courses

- If the internship is organized to yield 800-level CEU, the Host Company's representative who oversees the student's work need not be approved since the course bears no academic credit.
- CEU for an internship class will be calculated according to the regular formula of 1 CEU for every ten hours of participation as planned for the course; not based on actual attendance. The intern will be enrolled in a section with a CEU valuation commensurate with the hours declared in the *Internship Agreement*.
- CEU-based 800-level instruction does not contribute to the 14 quarter term units or 120-hour minimum core requirement defining a certificate curriculum.

3. Internships as 900-level Courses

- Internships organized as 900-level courses do not yield credit but may be an integral part of programs with curricula for life skills such as UCLA Extension's Pathway program. Approval will be obtained through the internship agreement process as stipulated below.

C. Internship Agreement and Criteria

- An *Internship Agreement* defining the contractual relationship between the University/UCLA Extension, Host Company (if applicable) and Student must be executed prior to enrollment. Internship agreements shall be reviewed and signed by all parties and approved by the Associate Dean of Academic & Faculty Affairs.
- Internship agreements will be executed using forms approved for use by the UCLA *Office of Risk Management* and UC *Office of General Counsel* and shall be retained a minimum of five years from the date approved, in accordance with the University's records retention schedule.

- Students currently enrolled in an internship-eligible program are required to have completed at least 50% of the curriculum by the time the internship is scheduled to begin. When applicable, a governing or licensing agency may require more than 50% program completion before the start of an internship/practicum/placement. Students currently in progress who have not met the 50% program completion, but who have completed at least 12 units, may be approved for an internship based on the review and endorsement of the PD/CE, or their designee, and the approval of the Associate Dean of Academic & Faculty Affairs.
- Internship agreements may not be executed for international students until eligibility for CPT is determined by the UCLA Extension Office of International Student Services (ISS). Specific requirements are outlined below in the section E.

D. Compensation and the Volunteer Experience

- Internships may be paid or unpaid. For internships sought by Extension students at an outside Host Company, provided the student is eligible to be employed in the U.S., compensation is a matter of agreement between the student and the Host Company. International students who seek enrollment in paid or unpaid internships must meet special requirements as outlined below.
- For internships sought by Extension students at UCLA, PDs/CEs will verify, prior to enrollment, evidence of either limited-appointment employment, or acceptance as a volunteer under the supervision of an officially organized and University-sanctioned volunteer organization or Human Resources department. For UCLA-based internships, the agreement will prompt for and require either a *Verification of Employment* or a *Volunteer Invitation Letter*.
- In any of these circumstances, the paid or unpaid status of an internship will be disclosed to the University and Extension by the nature of the *Internship Agreement* accepted by the parties.

E. Requirements for International Students

In addition to the general criteria stipulated in this policy, international students with an F-1 visa must adhere to additional requirements for all internships as detailed in this section. International students must seek employment approval from a Designated School Official (DSO) in the Office of International Student Services before engaging in any employment. International (M-1) students on professional/enhanced-training visas are not eligible for internships.

While the PD/CE determines if a program is internship-eligible, the determination for CPT eligibility can only be made by an approved DSO in

accordance with the U.S. Department of Homeland Security (DHS) and the Student Exchange Visitor Program (SEVP) regulations.

Whether paid or unpaid, internships for international students, who meet the general academic criteria, must consult with and seek CPT Authorization from the ISS prior to obtaining approval of the PD/CE and the Associate Dean of Academic & Faculty Affairs.

International students are responsible for updating the ISS of changes to their internship agreement. If an internship is terminated, the student must immediately notify ISS to ensure the student's immigration record is properly updated and in compliance.

1. Curricular Practical Training (CPT)

- Students may only be approved for CPT when the internship experience is an integral part of an established curriculum and/or is academic credit bearing. Therefore, an international student who seeks an internship and is approved for CPT, can only register for an internship course that is at the 400 level, or in the case of the Pathway program, at the 900 level.
- To be eligible for CPT authorization to engage in an internship, an international student must be in valid F-1 visa status at UCLA Extension, enrolled on a full-time basis, and have completed 3 academic terms of study (9 consecutive-months) at UCLA Extension. Students in their final quarter may be allowed to enroll less than full-time. Students who transfer into UCLA Extension and have maintained an active F-1 visa status for the equivalent of an academic year may also qualify for CPT.
- Time spent in an English language course or an intensive English language program at any educational institution does not count toward this 9 consecutive-month-requirement. International students enrolled in an Intensive English language training program are not eligible for CPT.
- An international student can be authorized to work in a part-time or full-time internship. Part-time CPT (20 hours or less per week) does not impact eligibility for future Optional Practical Training (OPT) if applicable. If a student has completed 12 months of full-time CPT (21 hours or more per week) over the course of their program, they become ineligible for OPT at that educational level.

2. Optional Practical Training (OPT)

- OPT is pre- or post-graduation employment authorization that grants the student the ability to seek employment directly related to their major area of study. OPT is regulated and approved by the U.S. CIS in conjunction with a school's Designated School Officials, as approved by the SEVP.

UCLA Extension only assists international students in the application process for OPT and does not determine a student's eligibility for OPT.

IV. References and Listing

This policy will be publicly listed. Questions and comments are welcomed by the *Office of the Dean, Continuing Education and UCLA Extension*, (310) 825-2362; DeansOffice@uclaextension.edu.

See also:

- United States Department of Labor Wage and Hour Division; Compliance Assistance – [Wages and the Fair Labor Standards Act \(FLSA\)](#).