

Internships AA102

Last Reviewed: May 2017

Intent

A valuable work experience can provide students with insight to their chosen field of study and will serve to enhance and illustrate principles learned in the classroom. UCLA Extension therefore organizes fieldwork experiences as credit or non-credit-bearing courses in order to record students' engagement in practical workplace *Internships*. UCLA Extension enrolls nearly 600 students per year in classes organized as *Internships*. This policy defines conditions that will promote the academic value of internships and stipulates roles and responsibilities to limit exposure to unnecessary risk in an activity subject to close scrutiny.

Academic Value and 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 specializations may participate in an internship through Extension when internships are an approved part of the curricula.

Program Directors 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. Unless required by a governing or licensing agency of the State of California or by a U.S. Department of Education approved accrediting agency, to guard against labor exploitation internships cannot be a requirement of any certificate program or other organized curriculum. Internships may be used as an *elective* or as an entry in a *defined elective* list of a certificate curriculum. Internships may be required in specific programs where they are deemed and approved as integral to the curricular intent such as the Pathway Program, the Drug/Alcohol Counseling certificate, and College Counseling certificate.

Internship Organization and Academic Approvals

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).

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 he or she 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 a 10-week term; or a minimum of 30 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*.

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.

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.

Internship Agreements and Criteria

- An *Internship Agreement* defining the contractual relationship between the University, Host Company (if applicable) and Student must be executed prior to enrollment. Internships involving a Host Company are subject to the approval of the Associate Dean of Academic Affairs. Internship agreements will be executed using forms approved for use by the UCLA *Office of Risk*

Management and UC Office of General Counsel. Internship Agreements shall be retained a minimum of five years from the date they are approved.

- Students currently enrolled in an internship-eligible program and who will have completed at least 50% of the curriculum by the time the internship is scheduled to begin may enroll in an internship. Students currently in progress who will not meet the 50% criterion, but will have completed at least 12 units, may be approved for an internship based on the review and endorsement of the Program Director/Continuing Educator (PD/CE) or designated staff and the approval of the Associate Dean of Academic Affairs.
- International students must meet special requirements as outlined below in the section “Specific Conditions for F-1 Visa International Students.”

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 strictly 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.

Specific Conditions for F-1 Visa International Students

In addition to the general internship criteria listed above, international students with an F-1 visa must adhere to additional requirements for paid internships as detailed in this section. Approval from the International Student Office (ISO) is not needed for unpaid internships. International (M-1) students on professional/enhanced-training visas are not eligible for internships.

For paid internships, international students who meet the general criteria must consult with and obtain the approval of the academic program department, the Associate Dean of Academic Affairs, and the ISO before participating in paid internships as Curricular Practical Training (CPT), with the following stipulations:

Curricular Practical Training (CPT) and Optional Practical Training (OPT)

CPT is defined to be *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*. CPT is only available to international students 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)]. The following requirements apply:

- To be eligible for a paid internship as CPT, an international student must be in valid F-1 status at UCLA Extension, must be enrolled on a full-time basis, and have completed 3 academic terms of study (9 consecutive-months) at UCLA Extension. This requirement applies to international students who are new to UCLA Extension, who have transferred from another educational institution, and students who have finished OPT at UCLA Extension or any other institution.
- In consideration of international students who transfer from an academic program at another educational institution, the PD/CE or designated staff may grant an exception to the above CPT requirement and count time spent at another educational institution. PD/CE or designated staff will assess the student's academic record to verify the student's prior time was in valid, consecutive F-1 status, the course of study or major is the same, and their GPA meets the minimum requirement of the Extension program to which they are transferring. The academic program department will notify the ISO of such exceptions as part of the internship approval process.
- Time spent in an English language course or an intensive English language program at UCLA, UCLA Extension or other 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.
- The 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 OPT. If a student has completed 12 months of full-time (21 hours or more per week) CPT, they become ineligible for OPT at that educational level.
- OPT is post-graduation work/training that is directly related to an international student's major area of study. OPT is regulated and approved by the U.S. Department of Homeland Security in conjunction with a school's designated ISO. UCLA Extension only assists international students in the application process for OPT and does not determine a student's eligibility for OPT.

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 \(FLSA\).I](#)*
- *Glatt v. Fox Searchlight Pictures*. New York Southern District Court. 2011.