

## **Guidelines for Internships at University of Wisconsin–Milwaukee**

### **Introduction**

The University of Wisconsin–Milwaukee (UWM) is a top-tier research institution with an access mission located in Wisconsin’s largest city and metroplex. With both local and global impact in research, education and community engagement programs, UW–Milwaukee faculty and staff host interns or provide internships for scholars/professionals-in-training to engage in various educational, workforce and research activities. This document provides guidelines for hosting interns or providing internships at UW–Milwaukee.

### **Who Is an Intern?**

Interns are domestic or international students who are gaining a professional learning experience under direct supervision of a faculty or staff member. Internships are structured, short-term opportunities for students to gain skills and experience related to their field or area of study, primarily for their own benefit. Internships may be compensated or uncompensated. Interns are not visiting scholars who have already earned their credentials for pursuing research and scholarship (please see UWM’s Visiting Scholar Guidelines). Interns may be UWM students or students at other educational institutions.

### **Are Interns Compensated for Their Activities?**

Most interns are compensated for their internship activities. Interns who are compensated for their work, either through UWM or through a funding source managed by UWM, are treated as if they were a UWM employee and must follow UWM’s Human Resources protocols. Funding for an internship should be secured prior to advertising or offering an internship. Internship compensation must meet minimum wage thresholds.

Interns not compensated by UWM or through a funding source not managed by UWM are considered unpaid interns. Unpaid interns are subject to additional UWM scrutiny following the U.S. Department of Labor’s [Fair Labor Standards Act](#). Unpaid interns must be the “primary beneficiary” of the internship activities as specified by the FLSA seven-factor test. UWM’s hosting of unpaid interns, both domestic and foreign national, require review and approval by the appropriate dean, vice chancellor, and/or provost in consultation with Human Resources and, if applicable, the Center for International Education (CIE). If the intern will engage in lab or research activities that are externally funded, contact the Office of Sponsored Programs (OSP) Compliance Officer to determine whether the grant will allow such activities. Grant provisions, export control, or other regulations may not allow unpaid interns to contribute to certain research activities. In almost all cases, grant funds must be used to compensate interns for their research-related activities.

### **Can Foreign Nationals Be Interns?**

U.S. citizens or permanent residents have few barriers to becoming an intern at UWM. In contrast, most foreign nationals will not be eligible for an internship unless they are an enrolled UWM student on a F-1 or J-1 visa, regardless of compensation. There are occasional case-specific exceptions to this general rule, as permitted within regulatory parameters.

Additional protocols must be followed prior to offering an internship to those who are not U.S. citizens or lawful permanent residents. Those wanting to host a foreign national intern must pursue the following steps prior to extending an offer:

1. Contact your dean, supervisor and/or vice chancellor to express your interest in hosting a foreign national intern. Only deans or other UWM responsible officers have the authority to sign required federal documents or hosting agreements with third-party vendors.
2. Contact CIE to inform them of your interest in hosting a foreign national intern. Gather information from CIE about visa, Department of Homeland Security, and other U.S. government requirements for foreign nationals. To ensure compliance with federal laws, CIE must be involved in form creation, review and approvals for all foreign nationals visiting UWM. NOTE: UWM does not sponsor J-1 interns.
3. After consulting with CIE and OSP, inform your dean or responsible officer and HRBP about the inquiry status, providing documentation (e.g., email confirmation) from CIE and OSP that one is cleared to offer the internship to the foreign national.
4. Final approval to host a foreign national intern must receive approvals from the appropriate vice chancellor or provost after the previous steps have been completed.

### **How Does One Become an Intern?**

Interns must first be invited by a UW–Milwaukee faculty or staff member. Any UWM employee or unit that hosts an intern is subject to UWM HR policies and procedures. This invitation may take the form of an advertised position description on job boards, employment website, professional organization or other publicly accessible means. Those interested in becoming an intern may initiate the conversation with a faculty or staff member or program. Some UWM departments, programs or schools/colleges have information available online for those interested in becoming interns. The hosting faculty or staff member will initiate the process followed by an authorized invitation/offer letter from the appropriate academic unit or division authority.

Foreign national interns should review UWM's Center for International Education [webpages](#) for specific details and requirements. Interns are considered international interns if they are neither a U.S. citizen nor a lawful U.S. permanent resident. International interns are responsible for securing the required paperwork to pursue scholarly activities in the U.S. International interns must work with UWM's CIE to ensure compliance with federal law. Federal law and funding sources for some projects may prohibit a foreign national from an internship.

### **What Is the Nature and Responsibility of the Internship?**

Internships vary widely in appointment length and responsibilities. Hosting faculty or staff should have clearly defined research, scholarly, educational objectives, or cultural exchange goals in writing prior to advertising the internship opportunity. The posted internship description should include the length of internship, responsibilities, and compensation. The internship offer letter should include these details in the body of the letter or as an attachment.

Interns are subject to state and federal laws, University of Wisconsin Board of Regents and UWM policies, UWM's Code of Conduct, and the same expectations as employees for workplace behavior, safety, and security. Prior to the internship, UWM will conduct criminal background checks for compensated or long-term interns (and Restricted Parties Screening for international interns), or those with access to vulnerable populations under [UW System Administrative Policy 625](#). All interns accessing UWM IT resources must complete Information Security training. In addition, compensated or long-term interns will be required to complete Sexual Harassment training.

### **What UWM Resources Are Provided to Interns?**

Most UW–Milwaukee internships are compensated. However, all interns accepting an internship at UW–Milwaukee should secure financial resources for their travels to/from Milwaukee, room and board costs while staying in Milwaukee, health insurance (if needed), and other miscellaneous living expenses needed for the duration of their internship.

Interns with affiliations that are compensated or lasting longer than three weeks (considered long-term interns) will be provided an ePantherID, which includes an email account and access to UWM's wireless network and other resources. Interns may also be provided keys to labs or available office space, depending on the nature of the position and appointment. Interns who are not compensated or interning for three weeks or fewer will not receive ePantherIDs, IT access, or keys. The unit hosting the internship will initiate this process. Depending on the nature of the internship, additional office and computer resources may be available.

## UWM Process for Identifying and Hosting Interns

Step	Documentation Needed	Responsible Party
<p><i>(Unpaid Internship Opportunities)</i> Consult with Dean/Vice Chancellor and HR to verify whether the activities of the internship meet the requirements of the Fair Labor Standards Act (FLSA) *If internship opportunity is initiated by a student, this step must be completed before any agreement on terms.</p>	<p>Review of expected responsibilities/defined goals with consideration to the FLSA requirements</p>	<p>Host/HR</p>
<p>Internship opportunities generally are initiated through one of the following:</p> <ul style="list-style-type: none"> <li>- A department/unit has a need or program for which they advertise for interested interns</li> <li>- An interested student makes a connection with a department/unit or faculty/staff member who is able to define an appropriate internship opportunity</li> </ul>	<p>If an internship is posted externally, it should include sufficient detail of the experience and include the following:</p> <ul style="list-style-type: none"> <li>- Whether Paid/Unpaid and the payment amount</li> <li>- Duration of the internship</li> <li>- Defined goals to include research, scholarly or educational objectives, or cultural exchange</li> </ul>	<p>Intern/UWM Host</p>
<p><i>(Internships for Foreign Nationals)</i> Pursue the steps defined in the preceding Guidelines above to obtain approval and pertinent documentation.</p>	<p>Documentation may include:</p> <ul style="list-style-type: none"> <li>- Federal sponsorship documents for foreign nationals</li> <li>- Restricted Party Screening</li> <li>- Emails from CIE/HR confirming their review and support</li> </ul>	<p>UWM Host/Dean, Center for International Education, Office of Sponsored Program (depending on Program), HR Business Partner, VC or Provost</p>
<p><i>(Paid Internships or Unpaid Internships with Access to Vulnerable Populations)</i> UWM Host will consult with HR to initiate employee hiring process, including a background check *When processing can be achieved, unpaid internships longer than 3 months will be required to complete a background check.</p>	<p>Generally, this will initiate the student help hire process through the Shared Services Center, which includes a background check. Where unpaid, just the background check will be initiated. As required, additional training in accordance with <a href="#">SYS 625</a>.</p>	<p>UWM Host/HR</p>

<p>Department/Unit hosting the intern must provide documentation of the terms of the internship (“internship offer letter”)</p>	<p>Prior to beginning in the internship, there should be agreement of the overall terms to include:</p> <ul style="list-style-type: none"> <li>- Compensation (if unpaid, specify as such)</li> <li>- Duration of the internship</li> <li>- Specific responsibilities performed</li> <li>- Other work requirements/expectations</li> <li>- Defined goals to include research, scholarly or educational objectives, or cultural exchange</li> </ul>	<p>UWM Host/HR (where compensated)</p>
<p><i>(Unpaid Internships for non-UWM students of 3 weeks or longer)</i>  Within two weeks of expected start date, requests UWM ID and other access</p>	<p>Department/Unit Designee requests a sponsored account for an ePantherID. (Sponsored Student? Miscellaneous Sponsored?) should be selected on the webform application.</p> <ul style="list-style-type: none"> <li>- Information Security training</li> </ul> <p>*UITS Identification and Access to Services will not grant access to university services for more than one year at a time. If internship is extended, Department designee must be notified. Multi-year visits must be renewed annually. Dean’s designee acts as sole point of contact for access to services and should be the first person contacted if access to service is lost.</p>	<p>UWM Host</p>
<p><i>(Paid Internships)</i>  HR will initiate onboarding process with Intern</p>	<p>Student will complete I9, W4, Direct Deposit, Emergency Contact, Employee Self ID Form</p> <ul style="list-style-type: none"> <li>- Information Security training</li> </ul>	<p>Intern/HR</p>
<p>Internships with expected duration of 3 months or longer or those who are compensated must complete UW System required mandatory training  *Training protocols for unpaid interns may differ.</p>	<p>Information Security and Title IX Training</p>	<p>Intern</p>

Orientation	Host should provide necessary space and equipment to complete internship, based on the responsibilities. In first day/week, intern should be given orientation to department offices, labs, etc.	UWM Host
Offboarding	Host should follow UWM offboarding procedures, including return of equipment, discontinued access to IT systems. Host should consult with HR to ensure appointment is ended in respective HRIS systems.	UWM Host