**Information for Prospective Internship Hosts**

Thank you for contacting PNCA with information about your internship! The Career Services office is pleased to help promote internship opportunities that meet federal and institutional criteria. We value the mentorship you offer our students and look forward to working with you.

This sheet covers many of the frequently asked questions about undergraduate (BFA) internships administered by PNCA’s Career Services Department. If you would like to discuss the details of your opportunity further, please email career_services@pnca.edu to set up an appointment.

**Q. I have an internship opportunity. May I offer it to PNCA students?**

**A.** PNCA’s Career Services Department welcome internship opportunities that provide students with high-quality, art-related work experience to supplement and enhance their academic education.

All internships run through PNCA must be in compliance with the guidelines published by the U.S. Department of Labor. The full federal fact sheet is provided at the end of this packet. To summarize, the following six criteria for unpaid internship must be met:

1. The internship, even though it includes actual operation of the facilities of the employer, is similar to training which would be given in an educational environment;

2. The internship experience is for the benefit of the intern;

3. The intern does not displace regular employees but works under close supervision of existing staff;

4. The employer that provides the training derives no immediate advantage from the activities of the intern; and on occasion its operations may actually be impeded;

5. The intern is not necessarily entitled to a job at the conclusion of the internship; and

6. The employer and the intern understand that the intern is not entitled to wages for the time spent in the internship.
In concert with an in addition to the above criteria, PNCA’s Career Services office requires that internship must provide the following to students:

- Concrete **educational benefit to the student**
- **Mentorship and supervision** in various aspects of real-world professional experience
- A **safe work environment** that is appropriate for the profession
- **Meaningful tasks** for the student to complete
- **Clear feedback** for the student

Q. **My opportunity does not meet the internship criteria, but it’s still a great thing for students. May I offer it in a different way?**
A. It depends on the nature of your opportunity. You are more than welcome to offer paid employment to our students according to Federal law and industry standard. If you are not offering payment, please consult the fact-sheet about unpaid opportunities located on the Employer section of [www.pnca.edu/careerservices](http://www.pnca.edu/careerservices).

Q. **What kind of mentorship should I provide for an intern?**
A. Most PNCA internship provide the student with mentorship that is directly aligned with the internship tasks and the students’ creative field. For example, a photography intern typically works with a more experienced photographer; a graphic design intern typically works under the supervision of other graphic designers. In rare instances, the mentoring in an internship spans various fields. For example a photography student might intern with a nonprofit organization to gain mentorship in the nonprofit sector while also exercising their photographic skills. In situations where the most significant mentoring happens in an area not related to the intern’s tasks and/or creative field, this must be clearly stated in the internship posting.

Q. **Do students receive credit for internships?**
A. Students are welcome to enroll in credit-bearing internships. However, some students prefer to do internships without receiving credit. If you have a preference about this, please indicate so in your internship posting.

Q. **How much credit may a student earn for an internship?**
A. Students may earn 1 credit for every 45 hours of internship work, up to a maximum of 6 credits total. The most common kind of internship is 3 credits and thus involves 135 hours of work. It is rare for a student to earn more than 3 credits at a single internship site; details may be discussed with the Career Services department.
Q. Could you send your best student to intern with me?
A. The term “best” is subjective, and as such it is impossible for PNCA to select an intern on your behalf. Moreover, the application process is an important tool for our students to get acclimated to real-world hiring practices. PNCA only participates in a vetting process in extremely rare cases. To get the best fit for your particular needs, the ideal tactic is to write a very clear position description with detailed requirements.

Q. Should I pay an intern?
A. All unpaid internships must meet the U.S. Department of Labor internship guidelines as per federal regulations. If your internship does not meet those guidelines, it must be paid. If your internship does meet those guidelines, you may offer an unpaid internship. It should be noted that your internship will be much more sought-after (and your applicant pool much stronger) if you offer compensation.

Q. What should I include in my internship posting?
A. While there is no single correct way to write an internship posting, the best ones always give a clear sense of the experience an intern can expect. An accurate internship posting helps set the stage for realistic expectations and good communication.

It is helpful to include the following information in your internship posting:

- Description of the organization/site of the internship
- Description of tasks the student will undertake
- Explanation of the benefit to a student
- Name and position of the internship supervisor
- Start and end date (or a note about flexibility if there is any)
- Hours per week (or a note about flexibility if there is any)
- Number of credits and total number of hours that internship involves within PNCA’s guidelines (as described above—the most common scenario is 3 credits for 135 hours of work)
- Description of skills and qualifications you would like to intern to possess
- Description of the application process (it is most common to request a cover letter, résumé or CV, and sometimes portfolio samples)

Q. Do you have an example of a clear internship posting?
A. Yes, we have created a fictional sample. See the last page in this handout for further details.
Q. How do I advertise my internship?
A. Please follow these steps to advertise your opportunity:
   1.) Write an internship posting (as described above)
   2.) Email it to career_services@pnca.edu
   3.) If the internship seems to be a good fit, you will be provided with further instruction about how to post the opportunity online using our job board.

Q. How quickly can I get an intern?
A. You may advertise any time, but you will receive the best response if your internship hire can happen in a way that correlates to PNCA’s semester system. We suggest you start advertising for interns in March in order to find an intern for late May (the start of our summer vacation); start advertising in July in order to find an intern starting early September (our Fall semester); or start advertising in December to find an intern starting late January (our Spring semester). Off-sequence internships are technically possible, but fewer students are available for these opportunities.

Q. I found the perfect intern. What now?
A. There are various pieces of paperwork required by PNCA to ensure that the internship experience is good for both you and the intern. Two pieces must be filled out at the start of the interns; the others come later. You can expect to fill out the following items over the course of the internship:
   • Internship Understanding: This is filled out by the intern and is signed by both of you. This is due before the internship begins.
   • Learning Contract: This is written by the intern, perhaps with guidance from you, and signed by both of you. This is due before the internship begins.
   • Midterm Evaluation: This is written by you (using a worksheet provided by Career Services) and submitted in the middle of the internship.
   • Midterm Log of Hours: This will be written by the intern and signed by both of you.
   • Final Evaluation: Similar to the midterm evaluation, this is written by you (using a worksheet provided by Career Services) and submitted at the end of the internship.
   • Final Log of Hours: This will be written by the intern and signed by both of you.

Q. What do I do if there is an issue with my intern?
A. Good communication at the beginning of an internship typically sets the stage for a positive experience on both sides. As the internship host, you can help facilitate this process by creating a clear internship posting, by carefully reviewing the Learning Contract, and by conducting a pre-hire interview with candidates to clarify expectations. Of course, the intern is expected to facilitate this process as well by candidly discussing goals and expectations for the internship, by quickly learning
how to navigate student life and professional life simultaneously, and by following through with all academic and internship commitments.

In the rare instance that an issue arises, we recommend that you open a dialogue with your intern and also contact Career Services. Our email address is career_services@pnca.edu

Thank you again for your interest in mentoring PNCA student interns!
SAMPLE INTERNSHIP OPPORTUNITY POSTING

**Internship Title:** Sign Painting Intern

**Internship Host:** Acme Sign Company

**Location:** 1234 Tulip Lane, Portland, Oregon

**Summary of site and position:** Acme Sign Company is a small business operated by a third-generation sign painter. Celebrating our 50-year anniversary this year, Acme takes pride in handmade quality and old-fashioned dedication. This internship provides a rare opportunity for an intermediate-level painting student to work side-by-side with a seasoned sign-painting professional. The intern will learn technical tricks of the trade, including substrate preparation, paint considerations, brush maintenance, weatherproofing, and much more. In addition, the intern will be introduced to practical matters of small-business ownership like contracts, billing, and more.

**Intern Duties and Responsibilities:** The intern will be asked to perform a variety of tasks. Some tasks will be highly creative; some tasks will be repetitive; some will be mundane and yet essential to the operation of the business.

To be more specific, the intern can expect to do some or all of the following tasks:

- Prepare glass, vinyl, and other surfaces to accept paint
- Provide input about color schemes appropriate for various signs
- Mix proper quantities of paint with color accuracy
- Transfer images onto the painting substrate using a project and/or transfer paper
- Paint letterforms and images in various scales and styles
- Clean up brushes and other tools
- Perform various administrative tasks related to billing, contracts, and more

**Required Qualifications:**

- Positive attitude and reliability
- Excellent communication skills
- Interest in the field of sign painting
- Intermediate painting skills and high level of craft
- Ability to absorb new technical information quickly and implement these new skills
- Willingness to perform repeated tasks (for example, painting hundreds of dots on a single sign)
- Basic computer literacy

**Schedule and Time Commitment:** This internship requires a commitment of 5-10 hours per week during regular business hours. The internship will last approximately 4 months or until 135 hours have been completed. The desired start date is June 1st.

**Application Process:** Please send a cover letter, résumé, and link to online portfolio (if available) to Jane Smith: jsmith@acmesigncompany.org

**Application Deadline:** Applications will be accepted until May 1st.

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Fact Sheet #71: Internship Programs Under The Fair Labor Standards Act

This fact sheet provides general information to help determine whether interns must be paid the minimum wage and overtime under the Fair Labor Standards Act for the services that they provide to “for-profit” private sector employers.

Background
The Fair Labor Standards Act (FLSA) defines the term “employ” very broadly as including to “suffer or permit to work.” Covered and non-exempt individuals who are “suffered or permitted” to work must be compensated under the law for the services they perform for an employer. Internships in the “for-profit” private sector will most often be viewed as employment, unless the test described below relating to trainees is met. Interns in the “for-profit” private sector who qualify as employees rather than trainees typically must be paid at least the minimum wage and overtime compensation for hours worked over forty in a workweek.*

The Test For Unpaid Interns
There are some circumstances under which individuals who participate in “for-profit” private sector internships or training programs may do so without compensation. The Supreme Court has held that the term "suffer or permit to work" cannot be interpreted so as to make a person whose work serves only his or her own interest an employee of another who provides aid or instruction. This may apply to interns who receive training for their own educational benefit if the training meets certain criteria. The determination of whether an internship or training program meets this exclusion depends upon all of the facts and circumstances of each such program.

The following six criteria must be applied when making this determination:

1. The internship, even though it includes actual operation of the facilities of the employer, is similar to training which would be given in an educational environment;

2. The internship experience is for the benefit of the intern;

3. The intern does not displace regular employees, but works under close supervision of existing staff;

4. The employer that provides the training derives no immediate advantage from the activities of the intern; and on occasion its operations may actually be impeded;

5. The intern is not necessarily entitled to a job at the conclusion of the internship; and

6. The employer and the intern understand that the intern is not entitled to wages for the time spent in the internship.

If all of the factors listed above are met, an employment relationship does not exist under the FLSA, and the Act’s minimum wage and overtime provisions do not apply to the intern. This exclusion from the definition of employment is necessarily quite narrow because the FLSA’s definition of “employ” is very broad. Some of the most commonly discussed factors for “for-profit” private sector internship programs are considered below.
Similar To An Education Environment And The Primary Beneficiary Of The Activity
In general, the more an internship program is structured around a classroom or academic experience as opposed to the employer’s actual operations, the more likely the internship will be viewed as an extension of the individual’s educational experience (this often occurs where a college or university exercises oversight over the internship program and provides educational credit). The more the internship provides the individual with skills that can be used in multiple employment settings, as opposed to skills particular to one employer’s operation, the more likely the intern would be viewed as receiving training. Under these circumstances the intern does not perform the routine work of the business on a regular and recurring basis, and the business is not dependent upon the work of the intern. On the other hand, if the interns are engaged in the operations of the employer or are performing productive work (for example, filing, performing other clerical work, or assisting customers), then the fact that they may be receiving some benefits in the form of a new skill or improved work habits will not exclude them from the FLSA’s minimum wage and overtime requirements because the employer benefits from the interns’ work.

Displacement And Supervision Issues
If an employer uses interns as substitutes for regular workers or to augment its existing workforce during specific time periods, these interns should be paid at least the minimum wage and overtime compensation for hours worked over forty in a workweek. If the employer would have hired additional employees or required existing staff to work additional hours had the interns not performed the work, then the interns will be viewed as employees and entitled compensation under the FLSA. Conversely, if the employer is providing job shadowing opportunities that allow an intern to learn certain functions under the close and constant supervision of regular employees, but the intern performs no or minimal work, the activity is more likely to be viewed as a bona fide education experience. On the other hand, if the intern receives the same level of supervision as the employer’s regular workforce, this would suggest an employment relationship, rather than training.

Job Entitlement
The internship should be of a fixed duration, established prior to the outset of the internship. Further, unpaid internships generally should not be used by the employer as a trial period for individuals seeking employment at the conclusion of the internship period. If an intern is placed with the employer for a trial period with the expectation that he or she will then be hired on a permanent basis, that individual generally would be considered an employee under the FLSA.

Where to Obtain Additional Information
This publication is for general information and is not to be considered in the same light as official statements of position contained in the regulations.

For additional information, visit our Wage and Hour Division Website: 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
Contact Us

* The FLSA makes a special exception under certain circumstances for individuals who volunteer to perform services for a state or local government agency and for individuals who volunteer for humanitarian purposes for private 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 in the public sector and for non-profit charitable organizations, where the intern volunteers without expectation of compensation, are generally permissible. WHD is reviewing the need for additional guidance on internships in the public and non-profit sectors.