

Policy on Undergraduate Internships and Employment

I. Policy Statement

Internships (with or without stipends) and employment (with salary) may be available to undergraduates in academic and administrative departments, programs, institutes, and centers at Princeton University.

This policy establishes the criteria and requirements for offering internship and employment opportunities to enrolled Princeton undergraduates and non-Princeton (visiting) undergraduates from other institutions.¹

II. Who Is Affected By This Policy?

Princeton undergraduates and non-Princeton (visiting) undergraduate students. *

Academic and administrative units that appoint undergraduate interns or employees.

*This policy does not apply to enrolled Princeton students who are conducting research as a course requirement or are conducting research for the purpose of completing a senior thesis or junior independent work. Departments that provide funding to students conducting research for senior thesis or junior independent work should award these funds through SAFE. Students may receive funding for senior thesis/junior independent work research OR may be appointed as interns BUT NOT BOTH.

III. Definitions

Department: Any administrative or academic unit at Princeton University.

Employment: Work performed for the benefit of the University.

Internship: A structured educational training opportunity that is primarily for the benefit of the intern, not the University.

Salary: Payment to an employee for work performed.

Stipend: Non-qualified (taxable) scholarship provided to cover expenses incurred during an internship.

Non-Princeton (visiting) undergraduate student: Undergraduate student enrolled at an institution other than Princeton University.

¹This policy is intended to comply with applicable state and federal wage and hour laws.

IV. General Policy

- A. Undergraduate students may secure a position as an intern or as an employee (see Appendix A for a summary of the policy).
- B. Undergraduate students cannot be classified as a volunteer (undergraduate students must qualify either as an employee or as an intern; no category for “volunteer” work exists).
- C. The nature and structure of the student’s activity will largely determine whether the student should be classified as an employee or an intern (see worksheet provided in Appendix B for some assistance with this determination). If the student’s activity qualifies him/her as an employee, the University must treat the student in accordance with our Human Resources policies and federal and state wage and hour laws. If the student’s research or training activity qualifies as an internship, federal and state wage and hour laws are not applicable. Still, in most cases, appointing departments must offer the intern a stipend to offset expenses incurred during the internship.
- D. Departments may offer internships to enrolled Princeton undergraduates and to non-Princeton undergraduates who are enrolled at other institutions (only currently enrolled students are eligible to hold internships). **Priority consideration for these internships will be given to enrolled Princeton undergraduates**, unless specifically noted.
- E. Internships may be offered to non-Princeton *international* undergraduate students only under one of the following conditions:
 - i. As part of the International Student Internship Program (ISIP).
 - ii. As part of a reciprocal exchange with a domestic or international partner institution in which there is a formal Memo of Understanding (MOU) signed by the Provost.
 - iii. As part of a recognized structured educational program such as a summer camp or “school”, approved by the Provost.
 - iv. If the student is already in the U.S. in a valid immigration status and has legal authorization for training and employment. Such authorization may include F-1 status Curricular Practical Training (CPT), F-1 Optional Practical Training (OPT), J-1 status Academic Training or any other documented legal employment status that meets the criteria for the I-9 Employment Eligibility Form.

V. On-Campus Internships With Stipends

- A. In most cases, departments must provide stipends for interns. The stipend should not exceed the reasonable approximation of the expenses incurred by the intern during the internship. While stipends may vary between programs based on specific needs, a weekly stipend payment of \$400 is generally considered appropriate to cover food and lodging expenses
- B. Internships with stipends may be offered to Princeton students or to non-Princeton undergraduate students. Stipends for internships offered to enrolled Princeton undergraduates are administered through SAFE and paid through Accounts Payable as a non-qualified scholarship. Stipends for non-Princeton domestic students must be

approved by ODOC and paid through Accounts Payable as a non-qualified scholarship. SAFE is not available to non-Princeton students. *Non-Princeton international students cannot be appointed as interns (either with or without a stipend) unless they meet the criteria noted in section IV-E above. Any stipend will be considered to be non-service taxable income, not employment.*

VI. On-Campus Internships Without Stipends

Internships without stipends may be offered to non-Princeton domestic or international undergraduate students participating in either the International Student Internship Program (ISIP), a reciprocal exchange for which there is a formal MOU approved by the Provost or an educational program approved by ODOC. The intern must enter into the internship knowingly and freely accept the terms of internship.

VII. Employment

- A. Employment may be offered to Princeton undergraduates or non-Princeton undergraduate students. Students who are performing research work may be hired as casual hourly lab assistants or research assistants. As such, they must be compensated with the appropriate salary for their duties. Student Employment has the responsibility for reviewing job descriptions and pay rates and ensuring there is consistency in student wages across campus. All student jobs on campus must be posted on the Student Employment website or registered with Student Employment. Princeton student employees should be scheduled for a limited number of hours weekly, so that their employment does not interfere with their educational goals. As a guideline, Princeton considers 10 hours per week to be reasonable when allocating time for employment during the academic year.
- B. Non-Princeton international students can only be appointed as casual hourly employees if they are in the U.S. in a valid immigration status and have legal employment authorization. Such authorization may include F-1 status Curricular Practical Training (CPT), F-1 Optional Practical Training (OPT), J-1 status Academic Training or any other documented legal employment status that meets the criteria for the I-9 Employment Eligibility Form.
- C. Individuals in B1/B2 Visitors Visa status or in Visa Waiver status may NOT be employed at Princeton.
- D. By law, minors (under the age of 18) cannot be hired to work in a laboratory setting or to conduct work involving the use of hazardous agents.

VIII. Off-Campus Opportunities

- A. In some cases, departments may wish to appoint an undergraduate intern or hire an undergraduate employee based off campus, in another location in the U.S. or in another country. For positions based anywhere in the U.S., the policy components noted above all apply.
- B. For positions based outside the United States, please see the information below. Foreign countries may have different definitions of internships and employment and may have different requirements from U.S. law.

- i. Internships for enrolled Princeton undergraduates based outside the U.S. are normally administered by a designated Princeton unit such as the International Internship Program, Grand Challenges or the Princeton Environmental Institute. Such students may receive a stipend as described in Section V above and any such payments must be administered through SAFE. Sponsoring departments should ensure that the student has any and all research licenses and visas that may be required by the country in which the intern will be based.
- ii. Effective January 6, 2014, all Princeton undergraduates conducting Princeton internships abroad or in the U.S. but outside the greater New York-Philadelphia area MUST register their travel in Concur. Prior to that date, students must register their travel in the University Travel Database.
- iii. Employment (or designation as casual hourly workers) of Princeton undergraduate students working outside the U.S. is not permitted.
- iv. Princeton departments may not appoint non-Princeton undergraduate students as interns working outside the U.S.

IX. Contacts for Policy Inquiries and Assistance

Academic Departments and Programs:

Pascale M. Poussart, Director of Undergraduate Research, Office of the Dean of the College, 609-258-1065, poussart@princeton.edu

Administrative Departments:

John Martin, Associate Director, Client Services, Human Resources, 609-258-8654, jm2@princeton.edu

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Last Update: January 30, 2016

Appendix A: Student Intern and Employment Policy Matrix

	Princeton undergraduate students	Non-Princeton domestic undergraduates	Non-Princeton international undergraduates
Internship on campus with stipend	Permitted (stipend administered via SAFE)	Permitted once approved by ODOC. Princeton students must be given priority consideration, unless part of an exchange or recognized program.	Permitted only when part of the International Student Internship Program (ISIP), an exchange or recognized program approved by the Provost and/or already in the U.S., with proper training authorization.
Internship on campus without stipend	Not permitted	Permitted only when part of an exchange or recognized program approved by the Provost or ODOC.	Permitted only when part of the International Student Internship Program (ISIP) and/or an exchange or recognized program approved by the Provost.
Internship off campus (in US) with stipend	Permitted (stipend administered through SAFE)	Permitted once approved by ODOC. Princeton students must be given priority consideration, unless part of an exchange or recognized program.	Not permitted
Internship off campus (outside US) with stipend	Permitted (stipend administered through SAFE)	Not permitted	Not permitted
Internship off campus (in US) without stipend	Not permitted	Not permitted	Not permitted
Internship off campus (outside of US) without stipend	Not permitted	Not permitted	Not permitted
Employment on campus	Permitted through Student Employment.	Permitted through Human Resources.	Permitted through Human Resources only if in the U.S. with proper training or employment authorization.
Employment off campus (in US)	Permitted	Permitted	Permitted only if in the U.S. with proper training or employment authorization.
Employment off campus (outside US)	Not permitted in most cases.	Permitted only when hired through an institutional payment arrangement with a university partner, a Professional Employment Organization, or another third party.	Permitted only when hired through an institutional payment arrangement with a university partner, a Professional Employment Organization, or another third party.

Appendix B: Intern or Employee Worksheet

1. The internship, whether it occurs on or off campus, is clearly structured as an educational experience (as opposed to routine or recurring work operations) Y/N
2. The internship experience is for the benefit of the intern Y/N
3. The intern does not displace regular employees, but works under close supervision of faculty or existing staff Y/N
4. The employer or department that provides the training derives no immediate advantage from the activities of the intern and on occasion its operations may actually be impeded Y/N
5. The intern is not necessarily entitled to a job at the conclusion of the internship Y/N
6. The employer and the intern understand that the intern is not entitled to wages for the time spent in the internship Y/N
7. The funding source (sponsored grant or other type of funding) allows that the student be compensated with a stipend (as opposed to an hourly wage) Y/N

If all of the answers above are “yes,” then the student should be appointed as an intern and receive a stipend administered through SAFE (only if enrolled at Princeton) and paid through Accounts Payable as a non-qualified scholarship.

If one or more of the answers above is “no,” then the student should be hired or appointed as a student employee through the Student Employment Office (if enrolled at Princeton) or casual hourly employee through Human Resources (if not enrolled at Princeton).