

# **Clarification regarding Academic Internship Credit and Compensation** Adopted March 8, 2022

#### Overview

This document seeks to provide clear and standardized policies for questions of internship credit and/or compensation, which are two distinct determinations. First, with regard to credit, Brown students may receive academic credit for experiential learning that includes internships and other practical experiences through structured coursework that complies with the <a href="CCC framework for academic internships">CCC framework for academic internships</a>. Second, with regard to compensation, students may receive academic credit for experiential learning opportunities which include payment, because credit and compensation are separate issues.

### Rationale

In the past, Brown did not generally permit students to earn compensation and also to receive academic credit for the same internship. While this practice does not appear to be codified in a specific written policy, it is referenced in material from the CareerLAB, the Curricular Resource Center, and other units.

Allowing students to earn both compensation and academic credit for an internship will support student learning and support students with educational expenses. In addition, the Fair Labor Standards Act (FLSA) requires that interns receive compensation for some internships that qualify under that law, and some employers are unwilling or unable to offer unpaid internships; thus allowing students to receive both compensation and academic credit for internships will provide greater access to more internship opportunities for students.

As an educational institution, Brown can determine whether an internship is a credit-bearing educational experience; this decision is separate from whether an employer is allowed or required to pay an intern. This position statement from the National Association of Colleges and Employers (NACE) makes clear that receiving credit for an internship or receiving financial compensation are two separate determinations.

### **Guidance Regarding Academic Credit for Internships**

Brown students are permitted to earn both compensation from Brown or an external source and academic credit from Brown for the same internship as long as the student's experience is a

component of a structured course or an Academic Internship approved by the Curricular Resource Center.

Student experiences should comply with the <u>CCC's May 2018 Guidance</u> for the *Framework for Course Design and Award of Academic Credit for Internships* and adhere to the following elements, as per the CCC guidance:

- Connection to Academic Content
- Intensity and Duration
- Reflection
- Evaluation and Assessment
- Faculty Involvement

## **Guidance Regarding Compensated Experiences**

Students who engage in internship experiences that are compensated are not precluded from also receiving credit for them, as long as the above mechanisms are followed to ensure the academic integrity of the credit-bearing experience. Compensation may be provided by sources external and internal to Brown. Students have the ability to choose whether to accept a paid or unpaid internship, recognizing that some employers or Brown funding sources may require that certain internships be paid whereas others may only provide unpaid internships. This approach is meant to provide students with the flexibility to secure the opportunities that best support their personal and learning goals.

Internships that are internal to Brown and compensated through Brown funding sources must comply with the University's <u>Paid Internship Opportunities Policy</u>. Likewise, unpaid internships that are internal to Brown must comply with the University's <u>Unpaid Internships and Volunteer Opportunities Policy</u>.

These <u>example scenarios</u> are intended to provide further clarification to this guidance.