

Division of Public Health (DPH) Guidelines For Using Unpaid Public Health Interns

To avoid confusion over employment status when using unpaid interns, the intern, not the employer, should be the “primary beneficiary” of the relationship. Work is seen as primarily benefiting the employer most often in cases where the employer merely uses interns in lieu of hiring (and compensating) employees, and where the employer does not help the intern learn and apply relevant transferable skills.

- The focus of the internship is to provide a training opportunity for the intern. .
 - A program that provides internship training does so in order to train other individuals. The program is not expected to gain immediate operational advantage from the intern.
 - Indirect benefit to the program may occur. Staff mentoring the intern may gain new insight into problem solving, may refresh their skills and knowledge, and may advance recruiting strategies.

- Employees should not be displaced by interns, and interns should not solely be used for providing temporary “fill in” for vacancies.
 - The intern’s work will complement, not displace, the work of paid employees.
 - The intern will work under close supervision of existing staff.
 - Mentors/Managers will assign interns tasks that help the interns acquire transferable skills unique to a specific profession or area of study.
 - In the case of a health promotion internship, for example, the program should ensure interns learn skills necessary to perform the functions of health promotion professionals.
 - Tasks such as filing documents, making copies and sorting mail may supplement other experiences but will be so only after other tasks and roles are completed. Minimizing these types of tasks will eliminate the perception that the intern is viewed as a replacement for clerical support employees.

- Use a disclaimer in written materials and sign a disclaimer form (see “*North Carolina Division of Public Health Intern Application and Assignment Form*”).
 - All materials referencing the internship program, particularly internship announcements, should clearly indicate that an unpaid internship is a learning experience and not an offer of temporary or permanent employment.
 - The intern and the program should clearly understand (and document in writing):
 - That there is no expectation of compensation. Any promise of compensation, express or implied, would suggest that the intern is an employee.
 - That the internship is conducted without entitlement to a paid job at the conclusion of the internship.
 - Disclaimer language should read as follows: “*Any unpaid internship is a learning experience with no expectation of compensation, is not an offer of temporary or permanent employment, and is conducted without any entitlement to a paid job at the conclusion of the internship*”.

Academic Model and Hands on Training

- The internship should provide training that would be similar to that which would be given in an educational environment, including the clinical and other hands-on training provided by educational institutions.
 - The internship should be tied to the intern's formal education program by integrated coursework or the receipt of academic credit, or as hands on requirement for a professional school.
 - Programs should align intern projects with specific learning objectives identified by the intern's academic program.
 - Intern projects should be outlined in writing and signed by both the intern and the DPH employee supervising/mentoring the intern.
 - Ideally, the intern's academic program will provide a template for such documentation, which is also frequently signed by a coordinator at the academic program.
 - Such documentation should include the specific learning objectives identified by the intern's academic program (or, in their absence, as mutually agreed upon by the intern and the DPH program supervisor).
 - A performance evaluation plan should be included in the written document, even if not required by the intern's academic program. Ideally, the intern's academic program will provide a template for an evaluation, which is also frequently signed by a coordinator at the academic program.

- DPH intern supervisors should assign interns smaller, discrete projects that have identifiable outputs and manageable timelines. Doing so will help facilitate the learning process and make it easier to evaluate intern performance.

- The internship should accommodate the intern's academic commitments by corresponding to the academic calendar (or some portion of it).

- The internship duration should be limited to the period in which the internship provides the intern with beneficial learning.

- Splitting time between supervised work and training promotes the learning experience for the intern. Attempt to diversify opportunities for the intern by incorporating various modes of instruction including written materials, shadowing experiences, and experiential learning opportunities.
 - A good rule of thumb is that interns should spend no more than half of their time on supervised, work-related projects that DPH program employees in a particular public health discipline are likely to perform (but not with the purpose or result of filling in for, or otherwise displacing or replacing, employees).
 - The remaining time should be spent learning, which includes training, shadowing, and networking with other employees. Examples of such learning opportunities include attendance at and participation in:
 - Program training that is scheduled for employees during the timeframe of the internship.

- Program staff meetings.
- Program strategic planning sessions.
- Meetings which engage community partners such as local health departments, hospitals, community or faith based organizations, etc.
- Commission, committee, or task force meetings.
- Legislative committee sessions.

Orientation

General Division of Public Health (DPH) orientation topics and materials to be used with DPH interns are included in Appendix 1, “*Required Components of North Carolina Division of Public Health (DPH) Internship Orientation*”.

- DPH programs are encouraged to develop and provide written program-specific orientation materials and resources for interns. It is highly recommended that programs either develop a resource book, to which the intern can frequently refer, or provide the intern with an electronic document with such materials.
- Additional information to provide interns in the first few days of an intern experience includes:
 - Information about the North Carolina Division of Public Health; the state’s Local Health Departments and the concept of a decentralized public health system; and the Department of Health and Human Services. Include organizational mission. Providing an organizational chart is also helpful.
 - Discussion of expectations and review of internship goals. Ideally, this would be accomplished in the context of the academic institutions written guidelines.
 - Discussion of any program specific policies and procedures, dress code, work hours, technology and phone systems.
 - Finalization of any necessary paperwork, particularly items that are required by the academic institution.
 - Provide a tour of the office or workspace.
 - Introduce interns to key people in the program area and DPH.

Supervision of Interns

- It is important to provide adequate supervision for interns. Employers should pair each intern with at least one supervising employee to be a resource for the duration of the internship.
- Intern supervisors should:
 - Be experienced employees capable of fulfilling their role as supervisors in the internship program.
 - Have the time available time to fulfill their responsibilities for the internship program.

- Be prepared to give instruction related to specific assignments; assist the intern with specific tasks; answer questions related to the assignment; and provide feedback and evaluation on work product.
 - Seek opportunities for the intern to shadow the supervisor on various assignments.
 - Seek alternate opportunities for the intern to shadow other staff in the assigned program area for project specific learning.
 - Be prepared to be a mentor on professionalism and workplace culture.
 - Make sure that interns have everything they need to be successful.
- Newly hired employees may not be optimal to serve as supervisors in the internship program.
 - Intern supervisors should provide each intern with access to another DPH employee who can serve as a mentor to the intern to answer any questions or resolve any issues that may arise between the intern and his/her supervisor.

Miscellaneous

- Intern supervisors should solicit and maintain a record of individual intern information, including emergency contact information (see “*North Carolina Division of Public Health Intern Application and Assignment Form*”).
- Unpaid interns are not authorized to drive state owned vehicles.
- Unpaid interns should not be assigned state owned portable electronic devices.

Sources

JD Supra Business Advisor. Morgan Lewis Law Flash Alert. *Second Circuit Establishes New Test for Unpaid Intern Claims* (July 2015). Available at: <http://www.jdsupra.com/legalnews/second-circuit-establishes-new-test-for-12619/>. Accessed September 4, 2015.

Morgan Lewis. CA Labor & Employment Bulletin. *Suggested Guidelines and Best Practices for Unpaid Internship Programs* (November 2012). Available at: http://www.morganlewis.com/~media/files/publication/outside%20publication/article/cleb_unpaidinternshipbestpractices_nov2012.ashx
Accessed September 4, 2015.

Appendix 1

Required Components of North Carolina Division of Public Health (DPH) Internship Orientation

The first days of the internship should be spent acquainting students with the organization. This orientation should provide an introduction to the overall aspects of the Department of Health and Human Services (DHHS) and Division of Public Health, including agency missions and functions, personnel, relevant organization charts, and facilities.

Specific Department of Health and Human Services (DHHS) or Division of Public Health (DPH) orientation materials that should be reviewed by all interns are listed below. For interns who will not have computer access to complete the training items, DPH program staff should provide the intern with printed materials. DPH program staff should also provide any program-specific orientation materials to the intern.

Name of Intern:

Name of Intern Mentor/Manager:

DPH Fire and Life Safety Training

<http://publichealth.nc.gov/employees/hr/safetyHealth/fireLifeSafetyTraining.pdf>

Date Completed and Initials:

DHHS Workplace Harassment Training

<http://www.dhhs.state.nc.us/humanresources/harassment/>

Date Completed and Initials:

DHHS Workplace Violence Training

<http://www.dhhs.state.nc.us/humanresources/violence/>

Date Completed and Initials:

DHHS' Alcohol and Drug Free Workplace Policy

http://info.dhhs.state.nc.us/olm/manuals/dhs/pol-50/man/Pol5_SB_ADfree1.htm

Date Completed and Initials:

DHHS' Workplace Smoking and E-Cigarette Policy

http://info.dhhs.state.nc.us/olm/manuals/dhs/pol-50/man/Pol5_SB_Smoking1.htm

Date Completed and Initials:

DHHS' Policy on Acceptable Use for DHHS Information Systems

http://info.dhhs.state.nc.us/olm/manuals/dhs/pol-80/man/12acceptable_use1.htm

Date Completed and Initials:

DHHS Summary Guidelines for Safeguarding the Privacy of Health Information

<http://publichealth.nc.gov/employees/dphit/securityTraining/SafeguardsSummaryGuidelines2014-May.pdf>

Date Completed and Initials:

DPH Basic Privacy Training (including signing DPH Confidentiality Agreement)

<http://www.schs.state.nc.us/hipaa/training/DPHBasicPrivacyTraining.pdf>

Division of Public Health Confidentiality Agreement

Date Completed and Initials: