



Policy Title:

Policy on Undergraduate Internships and Employment

Responsible Executive(s):

Dean of the College

Responsible Office(s):

Office of Undergraduate Research (OUR), Office of the Dean of the College (ODOC)

Contact(s):

Please direct questions concerning this policy to our@princeton.edu, or Pascale Poussart, Director of Undergraduate Research at poussart@princeton.edu or 609-258-1065. More information about summer internships is available at the website <https://undergraduateresearch.princeton.edu/compliance/internship-policy>.

Effective Date: 07/01/13; Last Updated: 01/12/24

I. Policy Statement

Internships (with or without stipends) and employment (with wages) 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 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.²

Academic and administrative units that appoint undergraduate interns or employees.

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

² This policy does not apply to Princeton students who are conducting term-time research as a course requirement or 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. During the summer months, students may receive funding for either senior thesis research OR may be appointed as summer 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 training opportunity that is primarily for the benefit of the intern, not the University.

Internship program: A structured educational program.

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

Wage: Payment to an employee for work performed.

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

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 volunteers.**³
- 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 them as an employee, the University must treat the student in accordance with all 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 requirements are not applicable.
- D. **Only actively enrolled students are eligible to hold internships.** Undergraduates who are on a leave of absence⁴ or have withdrawn from their University do not hold an active student enrollment status and may not be appointed as interns. Recent graduates also may not be appointed as interns.
- E. Princeton-sponsored internships may be offered during the summer period only, and not during term time.
- F. Priority consideration for Princeton-sponsored internships will be given to Princeton undergraduates, unless specifically noted.

³ While students may serve in a variety of volunteering roles on campus, students conducting mentored research must qualify either as an intern or an employee; no category for "volunteer" work exists.

⁴ Some exceptions apply. See the section on Summer Eligibility for Students on Leave policy at <https://ua.princeton.edu/policies-resources/special-features-undergraduate-program>.

- G. Internships are permitted only when part of an **internship program which has been reviewed and approved by the Office of the Dean of the College⁵ or the Provost. Individual internship appointments are not permitted.** Departments who wish to establish a new internship program must submit an [Undergraduate Internship Planning Sheet](#) for review. Approval is contingent upon the sponsoring department meeting the following criteria and requirements:
- i. Broadly advertise opportunities to eligible undergraduates.
 - ii. Ensure the selection process is fair and transparent to student applicants.
 - iii. Offer internship projects that are clearly structured as educational experiences, to the primary benefit of the interns (as opposed to routine or recurring work operations).
 - iv. Assign a faculty mentor or supervisor to oversee interns for the duration of the program.
 - v. Identify and verify completion of necessary training prior to the start of the experience.
 - vi. Centrally register on-campus interns through the [Summer Registration Portal](#).
 - vii. Offer programming in support of the interns' successful participation in the program.
- H. In most cases, appointing departments must provide stipends. The purpose of the stipend is for interns to offset expenses incurred during the internship, not to serve as wages. While stipends may vary between programs based on specific needs, the University sets a [recommended weekly stipend amount](#) in early fall of each year that is generally considered appropriate to cover food, housing, and out-of-pocket expenses.
- I. Internships may be offered to non-Princeton *international* undergraduate students only under one of the following conditions:
- i. 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.⁶
 - ii. As part of a recognized structured educational program, approved by the Provost.⁶
 - iii. If the student is already in the U.S. in a valid immigration status **and** has legal authorization for training such as F-1 status Curricular Practical Training (CPT), F-1 Optional Practical Training (OPT), or J-1 status Academic Training. The

⁵ The Director of Undergraduate Research in the Office of the Dean of the College reviews and approves Princeton-sponsored summer undergraduate internship programs.

⁶ Programs whose participants are coming from abroad must complete both a federally mandated training plan as well as a program evaluation. These programs must also comply with all other federal regulations governing internship programs. In this case, potential host departments should contact the Davis International Center to understand the documentation required to procure a visa for the student through Princeton. Departments may not host international undergraduates whose visas have been procured by a third-party agency. The recommended weekly stipend amount must be met for a non-Princeton international undergraduate intern to be eligible for Princeton visa sponsorship.

intern must provide sufficient proof of legal training authorization to the internship program, to be collected for onboarding.

On-Campus Internships With Stipends

- A. Internships with stipends may be offered to Princeton students or to non-Princeton undergraduate students.
 - i. Stipends for internships offered to Princeton undergraduates are administered through SAFE and paid through Accounts Payable as a non-qualified scholarship.
 - ii. Stipends for non-Princeton domestic students are paid through Accounts Payable as a non-qualified scholarship. SAFE is not available to non-Princeton students.
 - iii. Non-Princeton international students cannot be appointed as interns (either with or without a stipend) unless they meet the criteria noted in section IV-I above. Any stipend will be considered to be non-service taxable (fellowship) income, not employment. If an international student does not meet the eligibility requirements in section IV-I, the student cannot participate in the internship, and the department will not be permitted to onboard and pay the student.

On-Campus Internships Without Stipends

Internships without stipends may be offered to non-Princeton domestic or international undergraduate students participating in either a reciprocal exchange for which there is a formal MOU or a structured educational program approved by the Provost. The intern must enter the internship knowingly and freely accept the terms of the internship; the host program should require participants to sign a written agreement before the start of the appointment acknowledging their understanding that no stipend will be offered with the internship.

V. Employment

- A. Employment may be offered to Princeton undergraduates or non-Princeton undergraduate students. As such, they must be compensated with the appropriate wage for their duties.
 - i. Actively enrolled Princeton students may be hired via Student Employment as student employees / research assistants. 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 term-time educational goals. As a guideline, Princeton

considers 10 hours per week to be reasonable when allocating time for employment during the academic year. Only actively enrolled undergraduates can be hired as student employees through Student Employment. Students who are not actively enrolled should be hired through HR as casual hourly employees

- ii. Non-Princeton domestic undergraduates who are performing research work may be hired as casual hourly employees through HR.
 - iii. Non-Princeton international students can only be appointed as casual hourly employees if they are in the U.S. on 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.
 - iv. Individuals in B1/B2 Visitors Visa status or in Visa Waiver status may NOT be employed at Princeton.
- B. 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.

VI. Off-Campus Opportunities

- A. All Princeton undergraduates conducting Princeton-sponsored internships or approved hourly work that involve travel to a location outside of the state of New Jersey and the New-York - Philadelphia greater metropolitan areas, or to any location for a period that exceeds 24 hours or that requires an overnight stay off campus MUST register their travel in the [Enroll My Trip system](#) in advance of the travel commencing.
- B. In some cases, departments may wish to appoint an undergraduate intern or hire an undergraduate employee based off campus.
- i. For positions based anywhere in the U.S., the policy components noted above all apply.
 - ii. Princeton undergraduates residing outside of the U.S. for more than 30 days during the summer may be appointed as an intern when part of an established program such as the International Internship Program or the High Meadows Environmental Institute Internship Program. Such students may receive a stipend as described in Section IV 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.
 - iii. Princeton departments may not appoint non-Princeton undergraduate students as interns located outside the U.S.
 - iv. In most cases, Princeton and non-Princeton undergraduate students are prohibited from employment through the University and earning wages outside of the U.S. unless the student position is related to a Princeton-sponsored program outside of the U.S. or fieldwork, and the work

or research abroad is required as part of the Princeton program or project. Every undergraduate hired to work outside the U.S. must submit a [Work and Research Abroad Request](#) and receive approval prior to starting their employment. Additional and/or different legal requirements may be required to be followed.

Appendix A: Student Intern and Employment Policy Matrix⁷

| | Princeton undergraduate students | Non-Princeton domestic undergraduates | Non-Princeton international undergraduates |
|---|--|---|---|
| Internship on campus with stipend | Permitted only when part of a program approved by ODOC. | Permitted only when part of a program approved by ODOC. Princeton students must be given priority consideration, unless part of an exchange or recognized program. | Permitted only when part of an exchange or recognized program approved by the Provost or ODOC 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. | Permitted only when part of an exchange or recognized program approved by the Provost. |
| Internship off campus (in U.S.) with stipend | Permitted only when part of a program approved by ODOC. | Permitted only when part of a program approved by ODOC. Princeton students must be given priority consideration, unless part of an exchange or recognized program. | Not permitted |
| Internship off campus (outside U.S.) with stipend | Permitted only when part of a program approved by ODOC. | Not permitted | Not permitted |
| Internship off campus (in U.S. or outside of U.S.) 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 U.S.) | Permitted | Permitted | Permitted only if in the U.S. with proper training or employment authorization. |
| Employment off campus (outside U.S.) | Not permitted in most cases. See the Student Employment Website for details. | Not permitted unless it is a position related to a Princeton-sponsored program outside of the U.S. or fieldwork, and the work or research abroad is required as part of the Princeton program or project. | Not permitted unless it is a position related to a Princeton-sponsored program outside of the U.S. or fieldwork, and the work or research abroad is required as part of the Princeton program or project. |

⁷ This matrix applies to **actively enrolled undergraduates only**. Undergraduates who are on a leave of absence, withdrawn from their University, or have recently graduated do not hold an active student enrollment status and may not be appointed as interns or hired through Student Employment; in some cases, they may be hired through HR as casual hourly employees.

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 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 actively 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 actively enrolled at Princeton) or casual hourly employee through Human Resources (if not actively enrolled at Princeton).