Unpaid Research Internship Programs are established to enhance the educational experience of a trainee and provide experience in clinical research, which could include interaction with human participants in a clinical or non-clinical setting. This procedure will apply to the School of Medicine and the School of Nursing. This procedure does NOT apply to the following:

• Students enrolled in an Emory University course or degree program. These individuals may volunteer or intern if allowed and approved by their Schools and Departments.

• Those volunteering in a laboratory setting. Those individuals should instead fill out the Emory University “Volunteer in Research Lab Registration From” which can be found at: <http://www.ehso.emory.edu/documents/forms/index.cfm> NOTE: Emory policy prohibits non Emory students under the age of 18 in laboratory areas: <http://policies.emory.edu/7.21> .

• Those participating solely as a clinical observer. Faculty interested in hosting an observer should follow the requirements of the hospital or clinical area in which they work.

In the early phases of an Internship the Intern may only shadow a faculty member or research team member. With appropriate training and close supervision the intern may progress to tasks that may be deemed minimal work. The Interns will not be credentialed or insured to work independently or have unsupervised contact with patients/participants. The intern can never be used to fill regular staffing needs. Any Department or Unit may establish a research internship program as part of their educational mission, although unpaid interns are not allowed at the VAMC. To do so, the following procedure must be followed:

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| **Document the program description by Including the following information** |
| 1. Identify Dept./Division, Program Director and date internship is to be established |
| 1. Identify the location and contact information of the administrative manager responsible for maintaining historical documentation of the program and participants |
| 1. Identify the names of the teachers or mentors associated with the program |
| 1. Describe the focus of the educational experience and how it will be delivered and evaluated |
| 1. Describe the measures that will be taken to insure that the internship is not being used to enhance staffing needs |
| 1. List expected qualifications for participation in the internship program and a description of the process used to identify and accept interns into the program |
| 1. List length of program or describe a variable program (months vary for individual intern based on expected objectives). Note: An Internship cannot exceed 24 months |
| 1. An outline of how the individual program will be monitored by the Department. Risk Management requires documentation of a pro-active, organized way of monitoring and supervision of interns, and the compliance to all requirements for each intern. |
| 1. A plan to ensure completion of required regulatory and safety training for each intern. Certification is mandatory, and must be completed before the intern participates in any research activity involving human subjects. <http://www.ehso.emory.edu/content-policies/SupervisorsGuidetoEHS_2.pdf> |
| 1. Completed Observership forms based on location of Internship |

Submit the description of the Unpaid Internship Program to the Assistant Dean for Research for the School of Medicine or School of Nursing for review. Once the Internship Program has been approved interns may be accepted into the program.

The Assistant Deans for Research should be notified when a new intern has been accepted (include mentor name and program name). This will trigger a notification to the IRB giving approval to add the student to the faculty member’s protocol.

The department must maintain documentation of the following information for every intern:

* 1. WOC (Without Compensation) appointment with Emory University
  2. Confirmation that the Intern has been issued a Emory visitor ID identifying intern as a Volunteer (Interns are required to wear ID at all times)
  3. Confirmation from Emory HR that the background check has been completed (e-mail confirmation will be given)

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| **Required Documents for all Intern Applicant** |
| 1. All unpaid interns and their mentor must sign the Intern Acknowledgment Statement. |
| 1. For non-citizens, documentation that Emory’s International Student and Scholar Services confirmed that the internship activities are permitted by the individual’s visa status and immigration law and rules. |
| 1. All interns must comply with the requirements of the Healthcare facility they will be assigned to including meeting Observership requirements (see links below) |

Link to Emory Healthcare Observership Request form: <http://www.med.emory.edu/research/resources/index.html>

Grady Observership forms can be found at: <http://med.emory.edu/main/research/resources/index.html>

1. The department should maintain an annual program summary that includes the following:
   1. Description of activity for past year including the student and the name of their mentor
   2. Copy of the evaluation for each intern in the program.

A copy of the annual summary should be submitted to the following person, depending on the School:

Assistant Dean for Research, School of Medicine at [phaugaa@emory.edu](mailto:phaugaa@emory.edu) . Associate Dean for Research, Nell Hodgson Woodruff School of Nursing at Betsy Corwin at [Elizabeth.j.corwin@emory.edu](mailto:Elizabeth.j.corwin@emory.edu).

**IMPORTANT NOTES and Links**

* The Fair Labor Standards Act prohibits the use of unpaid or volunteer individuals to replace regular employees <http://www.dol.gov/whd/flsa/>
* Department of Labor Fact sheet #71, Internship Programs Under the Fair Labor Standards Act. <http://www.dol.gov/whd/regs/compliance/whdfs71.pdf>
* ***Note: faculty proposing to establish a research internship must review the Emory University Student Intern (unpaid) Policy, number 4.116 and the Emory policy on volunteers, number 4.83***. <http://policies.emory.edu/>