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| Internship & Clinical Student Rotation Policy | **Last Revision:** | March 2020 |
| **Last Reviewed:** | March 2020 |
| **Applies to the following THA Group of Companies:** | * Island Health Care * Island Hospice * Independent Life at Home * RightHealth® * THA Services * Palliation Choices |
| **Included in the following THA Manuals:** | Administrative Policies & Procedures  Talent Management |

### PURPOSE

THA Services periodically utilizes Interns for specific periods when they are not in school, and/or may participate with accredited colleges or universities to offer clinical rotations to their Students to assist in their professional training. The purpose of this policy is to outline responsibilities and to ensure such student workers have a productive stay with the company.

### POLICY

**DEFINITIONS:**

**Intern** - person who works as a trainee in an occupation or profession to gain practical experience. May also be referred to as “apprentice”, “student”, or “student worker”.

Federal guidelines released by the U.S. Department of Labor (DOL) lists six factors to use in determining whether an intern is a trainee or an employee under the [**Fair Labor Standards Act**](https://www.shrm.org/LegalIssues/FederalResources/FederalStatutesRegulationsandGuidanc/Pages/FairLaborStandardsActof1938.aspx) (FLSA). If all the factors are met, then the worker is a “trainee,” an employment relationship does NOT exist under the FLSA, and the act’s minimum wage and overtime provisions do not apply to the worker. If any one of the six factors below are not met, the Intern would be classified as an employee, would nearly always be considered nonexempt, and must be paid at least minimum wage and overtime pay.

Six Factors:

1. The training, even though it includes actual operation of the facilities of the employer, is similar to what would be given in a vocational school or other educational institution.
2. The training is for the benefit of the trainees.
3. The trainees do not displace regular employees, but instead work under their close observation.
4. The employer that provides the training derives no immediate advantage from the activities of the trainees, and on occasion the employer’s operations may actually be impeded.
5. The trainees are not necessarily entitled to a job at the conclusion of the training period.
6. The employer and the trainees understand that the trainees are not entitled to wages for the time spent in training.

### PROCEDURE

1. **Authorization.** Hiring managers who plan to add interns for specific assignments, must seek approval from the President and CEO. The following information must be provided: a) hours of work, b) duration of the expected work, and c) proposed rate of pay for the student worker, if any.
2. **Coordination.** In instances where a student is of an accredited college or university and will participate in a clinical rotation at any of THA Group service lines, Performance Excellence will serve as the coordinator at THA Services. The coordinator will be responsible for:
   1. Making certain all aspects of any written agreement are followed during the course of the rotation.
   2. Selecting partner clinicians in cooperation with clinician managers.
   3. Assisting Talent Management and clinical managers in collection of documentation as required.
   4. Being the communications liason between THA and the institution.
3. **Onboarding.** Talent Management will conduct a thorough screening process to include the following: Criminal Record, DMV, Drug Screen, References, license verification, education verification, OIG, I9, E-verify, and vehicle registration.
4. **Orientation.** An intern will be provided with an abbreviated orientation program that will highlight key aspects of the position the intern will be engaged in as well as all company policies with which he or she will be expected to conform during the specific term of the internship. This orientation will exclude any discussion of programs and policies, including many of the benefits plans, which do not apply to specific-term interns.
5. **Facilities department notification.** The Talent Management department will notify the facilities department, which will coordinate workstation issues, including telephone and Internet capabilities, with the IT department to ensure that the workstation is fully operational prior to the intern’s start date.
6. **Department orientation.** Each intern will be provided with an in-depth review of department functions and activities and the interaction of these activities with the work the intern will be performing. The department review will be conducted by the department leader during the first week of the internship.
7. **Progress report.** Due to the short-term assignment of student workers, and in accordance with school/university reporting requirements for students, the department manager will be responsible for providing a narrative report of the student worker’s assignments and progress at reasonable intervals. A copy of any Progress Report will be forwarded to the Talent Management department for record-keeping and reporting purposes.
8. **Final report and out-processing.** In the week in which an intern’s assignment comes to a close, the department leader will provide a Final Progress Report in addition to any report required by the educational institution the student attends and will advise the Talent Management department to schedule an exit interview to be conducted on the day preceding the student worker’s last day of work.