



CITY OF PROVIDENCE

3.7 STUDENT INTERNS/ FELLOWS - PAID AND UNPAID

Purpose

The purpose of this policy is to provide clear guidance on the onboarding, classification, and management of student interns and fellows working within the City of Providence. This program supports educational and professional development while contributing to City operations in a structured, compliant manner.

This program complements, and in no way replaces positions that should be filled through the City's hiring process.

Scope

This policy applies to all departments engaging student interns or fellows, whether paid, unpaid, or sponsored through third-party organizations.

Definitions

Intern: A student or recent graduate who temporarily works within the City to gain practical experience related to their field of study or career interests. Interns may be paid, unpaid, or sponsored by a third party.

Fellow: A participant in a structured learning or service program—often post-graduate—who works on specific projects or assignments within the City, typically for a defined term and under formal guidelines. Fellows may also be paid, unpaid, or sponsored.

Paid Intern/Fellow: An individual compensated directly by the City for their time and work under a temporary employment classification.

Third-Party Sponsored Intern/Fellow: An individual placed within the City through an external program or organization, which provides oversight and compensation. These individuals are not City employees.

Supervisor: A City employee assigned to oversee the intern/fellow's daily activities, provide direction, and ensure the experience aligns with the City's goals and program guidelines.

Policy

1. Intern Classification

A. Paid Internships

1. Paid interns are classified as temporary, non-benefited employees.
2. Compensation shall be at or above Rhode Island's minimum wage.
3. Hours are typically limited to 20 hours per week during the academic year and 35 hours during breaks.

B. Unpaid Internships

1. Must meet the DOL's "primary beneficiary test" to ensure the internship is educational in nature. This test allows for the examination of the "economic reality" of the intern-employer relationship to determine which party is the "primary beneficiary" of the relationship.
2. Unpaid interns shall not displace regular employees or perform primary operational tasks, nor shall they perform work designated to positions covered by unions as provided by the collective bargaining agreement (CBA).
3. Participation must be tied to an educational program or academic credit.

C. Third-Party Sponsored Interns/Fellows:

1. Individuals who are placed through and/ or compensated by a community organization, educational institution, or external fellowship program.



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2. Although they perform work within the City, their pay, oversight, and primary accountability remain with the sponsoring organization.

2. **Onboarding Requirements**

- A. Interns over the age of 18 are subject to a background check, including a Bureau of Criminal Identification (BCI) screening, as part of the onboarding process.
- B. For paid interns and fellows, a digital status form must be submitted. These placements must go through the standard approval process, including required signoffs from the Finance Department, Department of People and Culture (DPC) and other designated offices.
- C. All paid interns must complete onboarding paperwork with DPC.
- D. Third-party sponsored placements must be supported by a formal agreement or Memorandum of Understanding (MOU) between the City and the sponsoring organization. This agreement should outline the scope of work, supervision, duration, and any liability or compliance considerations.

3. **Supervision and Work Guidelines**

- A. All interns and fellows must be assigned a designated supervisor who will provide guidance, training, and oversight.
- B. Interns and fellows may not perform work that displaces regular employees or involves access to confidential or sensitive information unless specifically authorized, nor shall they perform work designated to positions covered by unions as provided by the CBA.
- C. Supervisors are responsible for ensuring that interns' work aligns with learning objectives and city goals.

4. **Duration and Limits**

- A. Internships and fellowships are temporary in nature and should not exceed six months unless part of an approved academic or fellowship program.
- B. Interns/fellows may work in any increment as long as the total hours comply with classification limits and any grant or program restrictions.

5. **Timekeeping and Compensation (Paid Interns)**

Paid interns must accurately record all worked hours through the department's timekeeping system. Overtime is prohibited unless pre-approved by the department director.

6. **Compliance**

Failure to follow this policy may result in termination of the internship or fellowship placement. Departments found to have placed interns/fellows outside the approved process, misclassified a role, or violated labor laws may face disciplinary action.

Related Policies:

Time Clock Policy

Criminal Background Disqualification

Reemployment of Retirees

Job Request and Modification Policy

Other Related Information:

[Fair Labor Standards Act – US Department of Labor Standards](#)