



SMITHSONIAN INSTITUTION INTERNS

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1. PURPOSE

The purpose of this directive is to establish the policies related to Internships at the Smithsonian Institution (SI), including those administered directly through the Office of Fellowships and Internships (OFI) and those administered by units through authority delegated by OFI. For information about other types of academic appointments, please consult [SD 205, *Smithsonian Institution Research Associates*](#), and [SD 701, *Smithsonian Institution Fellows*](#).

2. DEFINITIONS

Academic Appointment: A Fellowship, Internship, or Research Associate appointment.

Academic Appointment Coordinator: An SI employee assigned by a unit director to coordinate Academic Appointments of that unit.

Academic Appointment Council: An advisory body composed of Academic Appointment Coordinators and other SI staff who support SI Academic Appointments.

Academic Appointment Letter: A letter that OFI sends each newly appointed Intern setting forth the terms of the appointment between SI and the Intern.

Appointee: The individual holding the Academic Appointment.

Host Unit: The unit(s) to which Interns and their Mentors are assigned.

Intern: An Appointee who engages in a workplace-based learning experience guided by an SI Mentor, which relates to the Intern's academic or career goals. The designation of Intern is distinct from other types of Academic Appointments such as Fellows (see [SD 701, *Smithsonian Institution Fellows*](#)) and Research Associates (see [SD 205, *Smithsonian Institution Research Associates*](#)).

2. DEFINITIONS (continued)

Learning Objectives: A description of what an Intern hopes to learn during the Internship.

Mentor: An SI employee who guides the Intern in pursuit of the Intern’s Learning Objectives. The Mentor ensures that the Intern is abiding by the terms of the Internship and complying with the Intern Standards of Conduct (“Intern Standards of Conduct” below), as well as other applicable SI policies.

Mentor Objectives: A description of what a Mentor hopes to teach during an Internship.

3. POLICY

General Principles

Internships offer opportunities for individuals to learn through experience in the workplace, guided by SI Mentors. SI Intern learning often occurs through meaningful involvement with well-defined projects that are of service to the SI. The SI accepts Interns because it helps fulfill our mission to increase and diffuse knowledge. Interns also help build bridges to other people and organizations in the Institution’s efforts to excite learning in everyone.

The policies and procedures in this directive allow each SI unit hosting Interns to maintain additional written policies that do not conflict with this directive or other applicable laws or policies and are appropriate to its particular Internship program. Units should consult with OFI and the Office of the General Counsel (OGC) before issuing a policy that would be more restrictive than this directive.

Interns are not categorized as employees for the purposes of compensation, benefits, tax withholding and certain other aspects of employment. Interns are not permitted to hold another type of SI Academic Appointment during their Internship without prior approval from OFI.

Specific terms of each Internship appointment are governed by the Academic Appointment Letter, which sets forth terms and conditions of the Internship. This includes any stipend support being offered and the relationship between the SI and the Appointee.

Interns may be hosted simultaneously by no more than two Host Units, one of which shall be designated as the primary Host Unit. The primary Host Unit is responsible for coordinating dates and other administrative details (e.g., access to research space, computers, and other SI-wide services) for the Intern.

In some cases, a Host Unit Director may negotiate that a college, university, or other organization placing an Intern at SI pay the Institution a fee to help defray costs associated with

3. POLICY (continued)

SI hosting an Intern (e.g., administrative costs and/or staff time devoted to Mentorship).

During their appointment, Interns are expected to commit the amount of time indicated in the Academic Appointment Letter toward learning. Outside commitments inconsistent with the time an Intern has agreed to devote toward the Internship may not be undertaken during the period of the Internship.

Appointment Procedures

To appoint a new Intern, a Host Unit Academic Appointment Coordinator submits an electronic academic appointment form to OFI (please see the [OFI website](#) for the current versions of this form). After the academic appointment form is approved by OFI, the Internship appointment is made official when OFI sends an Academic Appointment Letter to the new Intern.

To extend an Internship, a Host Unit Academic Appointment Coordinator follows this same process, indicating that the appointment is an extension rather than a new appointment.

Units may prepare and send their own appointment and extension letters with unit-specific information to appointees so long as such letters are consistent with official OFI letters.

If a new or extending Intern is not a U.S. citizen, the Host Unit must notify OFI prior to the Intern's original appointment tenure and, if extended prior to the end date of the Internship, to confirm that the Intern's immigration status is correct and the visa dates are coordinated with any Internship appointment or extension. For Interns who are non-U.S. citizens, additional time may be required to allow for the immigration process. More information may be found in the subsection below on "Citizenship Requirements."

OFI maintains a database of current and previously appointed Interns. More detailed information about Academic Appointment procedures may be found in appointment guides and other resources maintained by OFI.

Titles

If a unit wishes to use a title for an Internship program (e.g., Young Ambassadors, Design Prep Scholars, Teen Council), it should ensure that the Interns involved with that project identify themselves as Interns.

In cases where an SI employee's title includes the word "Intern" (e.g., Presidential Management Interns), that person's employment is not guided by this directive but falls under the jurisdiction of the Office of Human Resources (OHR).

3. POLICY (continued)

Tenure

New Intern appointments are generally made for a period of no more than six months, but may be extended if it can be shown that additional learning will result from an extension. Under certain special circumstances (e.g., in order to meet visa requirements), upon request OFI may authorize initial Internship awards for longer than six months. The minimum appointment tenure for an Intern is one week.

In general, during a six-month Internship, Interns may take off time totaling up to two weeks, if planned in consultation with the Intern's Mentor. If time off beyond two weeks is needed (e.g., for family or medical reasons), Interns must consult with their Mentor and OFI. Requests for additional time off, during which an Intern intends to pause learning, must be submitted in writing to OFI through the primary Mentor.

Internship appointments may be terminated before the tenure end date listed on the Appointment Letter, at the SI's discretion, including for the following:

1. The Intern's Mentor requests in writing to OFI that an Internship appointment end because the Intern has not met a commitment outlined in the Academic Appointment Letter.
2. The Host Unit's director requests in writing to OFI that an Internship appointment end because he or she has determined that an appointee breached Intern Standards of Conduct or other applicable SI policies.
3. The Intern is either unable or unwilling to continue the appointment (including occasions when an Intern ends the appointment in order to accept employment with SI).

Stipends

Interns may or may not receive stipends. If the Smithsonian is paying the stipend, the stipend must generally adhere to current stipend caps as established by OFI (please see the OFI website for current stipend cap levels). Host Units may request a waiver from OFI on these caps if they can document higher stipend levels issued by comparable Internship programs.

Stipends are awarded to defray living costs incurred during the tenure of the Internship.

The SI generally does not withhold federal, state, or local income taxes or Social Security taxes

3. POLICY (continued)

from stipends because stipends are not considered salary or wages by the Internal Revenue Service. Interns are fully responsible for paying all applicable income and other taxes and should consult their own tax advisors, as needed. Stipends may not be paid retroactively.

As part of an Intern's SI stipend, an Intern may receive allowances designated to cover expenses associated with travel. From time to time, Interns may also receive support from non-SI sources to defray certain costs. Third-party support, including income gained from part-time work outside of SI, may be permitted, provided that such support does not interfere with the Intern's ability to fulfill the commitments specified in the Academic Appointment Letter or otherwise present a conflict of interest. Requests to receive additional (non-SI) stipend support must be submitted in writing to OFI through the primary Mentor. Limitations on receiving certain types of income may apply for non-resident alien Interns based on the visa type.

Citizenship, Age, and Academic Requirements

Except where specific programs or regulations require otherwise, Interns may hold any citizenship and residency.

Interns who are non-resident aliens in the United States are required to have appropriate immigration status and remain in an active immigration status throughout their Internship. They may be required to provide additional documentation to determine their residency status while present in the United States. Immigration procedures may require additional processing time for non-U.S. citizen Interns, depending on their immigration status. Based on the tax status of the non-resident alien, the SI may be required to withhold income taxes from a stipend provided to the Intern.

All SI Interns must be age 14 or older; Interns under age 18 must submit parental consent.

An applicant's current participation in a formal education program should be taken into account when granting an Internship. While enrollment in school is not required, applicants who are not enrolled or recently graduated should demonstrate how the Internship relates to their academic or career goals and provides significant educational benefits. Absent such a showing, consideration should be given to whether a different type of affiliation (e.g., independent contractor or Volunteer) is appropriate.

Grants and Contracts

An Intern may **not** be identified or serve as the Principal Investigator (PI) or as a Co-Principal Investigator (Co-PI) for external grants and contracts, or Contracting Officer's Technical Representative or Technical Point of Contact.

3. POLICY (continued)

Intellectual Property Rights

Work products created by SI Interns within the scope of their Internship and with oversight by an SI Mentor (e.g., text, photographs, illustrations, audio, video, research, graphs, recordings, databases, etc.), including copyright and other intellectual property rights in such work products, are owned by the SI. Use of such work products by Interns other than for SI purposes requires advance written permission from SI which may be granted on a case-by-case basis to the Intern for educational, non-profit purposes only. Requests for permission should be submitted to the Intern's Mentor, who will submit requests to the appropriate licensing or reproduction rights manager for approval. OGC and the Office of Contracting and Personal Property Management (OCon&PPM) are available to advise the manager regarding such requests.

Liability

Because Interns are guided by SI staff working on projects for SI, in the event that an Intern is injured or injures another person or damages the property of another in the scope of his or her Internship, SI liability for such injury or damage will be determined by the same criteria established for Smithsonian employees under the Federal Employees' Compensation Act or the Federal Tort Claims Act.

Related Activities

Interns may seek academic credit for their experience at SI; when appropriate, Unit Academic Appointment Coordinators and/or Mentors may certify satisfactory completion of an Internship for this purpose.

At the discretion of the Mentor(s), an Intern may simultaneously register and serve as an SI Volunteer during the period of the Internship appointment so long as the Volunteer position is hosted by a different department or unit than the one(s) hosting the Internship appointment ([see SD 208, *Standards of Conduct Regarding Smithsonian Volunteers*](#)).

4. RESPONSIBILITIES

Academic Appointment Coordinators are responsible for:

- sending Internship appointments (and supplementary documentation) to OFI for registration;

4. RESPONSIBILITIES (continued)

- completing all required procedures to provide Interns with appropriate access to SI facilities and systems;
- working with OFI to coordinate the extension of Interns in the Host Unit;
- developing and disseminating information about Internship programs at the Host Unit;
- ensuring that Interns complete all required training (e.g., computer security, protection of minors, prevention of workplace harassment [EEO], safety);
- authorizing the issuance of SI identification credentials in accordance with policies and procedures established by the Office of Protection Services (OPS) (see [SD 224, Identity Management Program](#), for details); and
- collecting and maintaining current emergency contact information for every Intern at the unit.

The **Academic Appointment Council** is responsible for:

- offering advice and facilitating communication about SI Academic Appointment programs;
- facilitating enrichment events for Appointees; and
- helping to publicize information about SI Academic Appointment opportunities.

Mentors are responsible for:

- ensuring that Interns can be accommodated within the SI unit space, equipment, and staffing limitations;
- providing Mentorship and practical support for Interns;
- ensuring that the Intern is acting consistently with the Academic Appointment Letter, complying with the Standards of Conduct for Interns (see page 9), and otherwise adhering to applicable SI policies;
- being aware of the statutory prohibitions against appointing, employing, promoting, or advancing a relative or advocating such actions for a relative (*5 United States Code* [U.S.C.] § 3110; see SD 103, *Smithsonian Institution Standards of Conduct*, [Appendix 2](#));

4. RESPONSIBILITIES (continued)

- completing training required for Mentoring Interns under 18 years of age, if applicable; and
- developing, where feasible and desirable, SI unit-supported enrichment activities for Interns (in consultation with OFI).

The **Office of Fellowships and Internships** (OFI), with oversight from the Under Secretary for Education, is responsible for:

- issuing and updating this directive;
- developing, administering, publicizing, and tracking Academic Appointments across SI;
- determining the propriety, approval, and awarding of Academic Appointments;
- maintaining a database of all SI Interns to support and evaluate Academic Appointment programs;
- confirming new and extending Internship appointments with Host Unit staff;
- sending Academic Appointment Letters and information packets to Appointees;
- collecting and retaining all agreements associated with Internship appointments and/or extensions;
- working with the Office of Finance and Accounting (OF&A) to ensure that stipends are paid accurately and on time;
- working with units to develop new Internship opportunities that comply with SI policy and procedures;
- ensuring that all Interns are made aware of their obligation to comply with SI policies applicable to Interns, such as, but not limited to, the Intern Standards of Conduct (Section 5 below) and policies prohibiting discrimination and workplace harassment;
- advising senior leadership, directors, and the SI community on matters of SI policy related to Internships; and
- convening regular meetings of the SI Academic Appointment Council.

4. RESPONSIBILITIES (continued)

The **Office of Finance and Accounting (OF&A)** is responsible for:

- working with OFI to ensure that stipends are paid accurately and on time.

The **Office of International Relations (OIR)** is responsible for providing assistance to foreign visitors and OFI regarding the types of visas required for Academic Appointees who are non-resident aliens, following [SD 848, *Visas for Foreign Visitors*](#).

Unit Directors who offer Internships in their units are responsible for:

- designating an Academic Appointment Coordinator for their respective unit; and
- consulting with OFI if they wish to develop new Internship programs that comply with SI policy and procedures.

5. INTERN STANDARDS OF CONDUCT

Interns must comply with the following standards of conduct. If there is any doubt that an activity or planned activity is in compliance, Interns should immediately seek the advice of their Mentor(s).

Failure to comply with the following standards is cause for revoking the Internship appointment.

Interns must:

- complete all required training (e.g., computer security, protection of minors, prevention of workplace harassment [EEO], safety);
- adhere to [SD 103](#), *Smithsonian Institution Standards of Conduct*, Section 13(c);
- adhere to [SD 124](#), *Protection of Minors*, especially when Interns of majority age interact with Interns who may still be minors;
- follow legal requirements and other applicable standards for conducting research in the discipline, such as those for collecting, obtaining import permits, and using live animals or human subjects: [SD 604](#), *Misconduct in Research*; [SD 605](#), *Animal Care and Use*; [SD 606](#), *Research Involving Human Subjects*; [SD 607](#), *Responsible Conduct of Research Training*; and [SD 611](#), *Export Compliance and Trade Sanctions Related to Research, Export and Museum Activities*;

5. INTERN STANDARDS OF CONDUCT (continued)

- adhere to [SD 118](#), *Privacy Policy*, to ensure the protection of personally identifiable information (PII) and [SD 119](#), *Privacy Breach Notification Policy*, when reporting any suspected or confirmed breaches of PII;
- adhere to the procedures established by the Smithsonian Institution Libraries (SIL) and unit libraries when using their resources and facilities;
- be aware of and guided by the generally accepted professional standards and codes of ethics applicable in their professional field(s);
- exhibit appropriate professional conduct and behavior, respect others, and cooperate in the enforcement of the prevention of workplace harassment as set forth in Chapter 5 of [SD 214](#), *Equal Employment Opportunity Program*; and
- adhere to the SI *Scientific Diving Policy* ([SD 120](#)) when applicable.

In addition to complying with the above standards, Interns must not:

- misrepresent their relationship with the Smithsonian, particularly in any way representing himself/herself as an employee, contractor, or affiliated individual other than as an Intern of the Smithsonian;
- publish or otherwise participate in non-Smithsonian, outside activities using their SI Internship affiliation or title without Mentor approval;
- use or disseminate confidential, sensitive, or proprietary information obtained through their SI appointment;
- use or disseminate export-controlled information without proper authorization (see [SD 611](#));
- directly or indirectly profit or appear to profit from, or permit or appear to permit others to profit from, information obtained through their SI appointment that is or would otherwise be unavailable to external scholars or the general public;
- solicit or accept any gift that is or appears to be offered because the Intern holds an SI Academic Appointment or may have influence within the Smithsonian;

5. INTERN STANDARDS OF CONDUCT (continued)

- use official SI letterhead and similar materials, mailing privileges, or equipment, or supplies for anything not related to official SI business;
- solicit or promote the sale of any goods or services on SI premises through the use of SI resources or facilities, including email;
- operate SI motor vehicles or off-road equipment unless the host unit determines that such use qualifies as official SI business as described in [SD 421](#), *Mobile Asset Fleet Management*, which provides that authorized operators may drive a motor vehicle or off-road equipment on SI official business only;
- reproduce copyrighted material (owned by the Smithsonian or a third party) in the absence of specific approval to do so from the rights-holder(s); and
- with the exception of stipends, receive, commit, or spend SI funds.

An individual with access to collections should be aware of the issues addressed in the respective unit's collections management policy and [SD 600](#), *Collections Management*. Access to and use of collections must be approved in advance by the appropriate unit staff member in accordance with established policy and procedures. An Intern working directly with SI collections must disclose any personal activity that may create or seem to create conflicts of interest, such as collecting or dealing in similar objects, materials, or specimens.

An Intern who becomes aware of any facts or circumstances giving rise to conflicts with the above-stated principles must immediately disclose such facts and circumstances to the Intern's Mentor(s).

6. CONTACT INFORMATION

Please visit the OFI [website](#) for more information and answers to questions about Internships.

SUPERSEDES:	SD 709, March 27, 2006.
INQUIRIES:	Office of Fellowships and Internships (OFI).
RETENTION:	Indefinite. Subject to review for currency 36 months from date of issue.
