

What You Need to Know to Host a High School Intern/Minor

Revised May 2023

To protect faculty PIs, lab staff, students, interns who are minors, and the university, these steps should be followed prior to a minor's entry into an internship at Stanford (whether paid or unpaid). If the minor will be hired to be paid as a Stanford employee, please refer to [Recruiting and Hiring of Regular Staff](#). Labs/hosts in the School of Medicine and School of Engineering should check with their HR Manager to see if this packet is acceptable or if they should complete paperwork specific to SoM/SoE. However, the [Protection of Minors Policy Requirements](#) still apply.

PLEASE NOTE:

1. All interns must be at least 16 years old to hold an internship or to be trained in a Stanford research or clinical setting where scientific research or instruction is conducted and where the intern may be working with hazardous materials and/or be exposed to physical safety hazards.
2. Minors interning in clerical or computational settings must be at least 14 years old.
3. If you are uncertain whether your internship meets these definitions, contact Mary Dougherty at EHS (mdough@stanford.edu). ESO does not offer guidance as to whether a project requires that interns be at least 14 or 16 years old.
4. Minors may not participate in unpaid internships at SLAC. Under rare circumstances, minor interns may be hired as employees.
5. It is the lab's responsibility to check an intern's age via passport, Driver's License, or birth certificate. If the participant is under the age of 18, many forms require the signature of a parent or guardian.
6. All interns must establish proof of identity and U.S. citizenship or permanent residency. Individuals who are not a U.S. citizen or permanent resident must provide documentation of their visa status and certify that if their visa status changes at any time before or during the internship, they will notify appropriate department staff and/or faculty within one business day after first becoming aware that such change in visa status will occur or has occurred. An individual with a pending H-1B visa application to work at the university cannot serve as an intern.
7. The host PI/department is responsible for monitoring compliance of the actions described on the next page and for retaining the paperwork for one year. It is especially important to follow the [Protection of Minors policy requirements](#). There are additional resources in this packet to assist if you need to follow the Protection of Minors Policy. Any minor who will be working in a lab environment with animals, unfixed tissues, or fluids needs to have their primary care physician complete the [Minor Medical Clearance form](#), and the PI needs to keep a copy on file.
8. These instructions and documents are updated periodically. For the most recent version of the document, please check our Resources page at <https://eso.stanford.edu/resources>.
9. For the latest COVID updates, see [Protection of Minors: COVID-19 Guideline](#)

This entire packet is meant to be a Job Aid to assist faculty who wish to host high school interns. It was compiled by Stanford's Office of Science Outreach, in collaboration with Stanford's Risk Management, Health & Safety, the General Counsel and Human Resources offices. It is not intended to provide legal advice. Contact Kyle Cole, Education and STEM Outreach (kylecole@stanford.edu) with questions.

Checklist of Actions for Lab/PIs and for Non-Employee Minor Interns

Required Action/Documentation LAB/PI

- Confirm this is an internship, not employment (Page 3)
- Complete Intern Project Description Form (*required by HR*) (Page 4)
- Verify minor is vaccinated with attestation from parent/guardian or minor.
- Review the [Health & Safety Requirements for Minors in Laboratories](#), especially “Restricted Activities”
- Obtain intern’s SUNet ID (Page 5)
- Send intern Health & Safety Training courses required & instructions for completing & documenting (Page 6)
- Read & agree to Mentor/Supervisor Guidelines & Expectations (Page 7)
- Read [Appropriate Behavior with Minors](#)
- Register internship in ePOM and follow Protection of Minors Policy requirements.

OPTIONAL

- Arrange Library Access or Borrowing Privileges for intern (Page 8)
- Instructions for Getting Intern Paid (Page 9)
- Miscellaneous Information/Other FAQs (Page 10)

Required Action/Documentation MINOR INTERN

- Get SUNet ID
- Complete Health & Safety Training as instructed by lab & submit documentation to lab
- Have parent(s)/guardian(s) sign the [Assumption of Risk, Release of Claims, Indemnification & Hold Harmless Agreement](#).
- If taking place in-person, complete the *Consent Form for Being Present in Potentially Hazardous Areas* (Page 11)
- Read Stanford Intern Code of Conduct (Page 12)
- Read [Stanford University Code of Conduct Policy](#)
- Sign [Patent and Copyright Agreement \(SU-18\)](#)

OPTIONAL

- Sign Field Trip Permission Slip (Page 14)
- Complete and sign SU-21 if being paid a stipend (Page 9)

Internship or Employment?

(New in January 2018)

Courts have begun using the “primary beneficiary test” to determine whether an intern or student is, in fact, an employee under the Fair Labor Standards Act (FLSA).^{*} In short, this test allows courts to examine the “economic reality” of the intern-employer relationship to determine which party is the “primary beneficiary” of the relationship. Courts have identified the following seven factors as part of the test:

1. The extent to which the intern and the employer clearly understand that there is no expectation of compensation. Any promise of compensation, express or implied, suggests that the intern is an employee—and vice versa.
2. The extent to which the internship provides training that would be similar to that which would be given in an educational environment, including the clinical and other hands-on training provided by educational institutions.
3. The extent to which the internship is tied to the intern’s formal education program by integrated coursework or the receipt of academic credit.
4. The extent to which the internship accommodates the intern’s academic commitments by corresponding to the academic calendar.
5. The extent to which the internship’s duration is limited to the period in which the internship provides the intern with beneficial learning.
6. The extent to which the intern’s work complements, rather than displaces, the work of paid employees while providing significant educational benefits to the intern.
7. The extent to which the intern and the employer understand that the internship is conducted without entitlement to a paid job at the conclusion of the internship.

Courts have described the “primary beneficiary test” as a flexible test, and no single factor is determinative. Accordingly, whether an intern or student is an employee under the FLSA necessarily depends on the unique circumstances of each case.

**Adapted from the Department of Labor, [Fact Sheet #71: Internship Programs Under The Fair Labor Standards Act](#)*

Interns can be unpaid, or they can receive educational stipends as long as the internship opportunity meets the “primary beneficiary test.” In that case, use the SU-21 form (see page 14) to pay the intern stipend.

If your position does not meet the “primary beneficiary test,” the student would be considered an employee. In that case, work with your HR department to complete all necessary employment paperwork. Please note, before an offer of employment is made to an applicant under 18 years who has not graduated from high school, the hiring department must obtain a [work permit](#) from the applicant’s school district and retain it in the department file.

Intern Project Description Form (for non-employee internships)

Mentor/Supervisor Information

First Name:

Last Name:

Lab Phone:

Cell (with Area Code):

Email:

Principal Investigator Information

Principal Investigator:

Email:

Program/Department:

Intern Project Description

Location where student will be working:

Brief description of the role of the high school intern or tasks that will be assigned:

Creating an intern SUNet ID

Paid or unpaid interns or paid employees must get a Stanford ID by creating a “SUNet ID” so that they can complete required Health & Safety training, access online resources, and get paid. The SUNet ID is a unique 3-8 character account name that identifies them as a member of the Stanford community. Directions for setting up a SUNetID in Stanford Accounts: <https://accounts.stanford.edu/create?execution=e1s1>

Faculty, managers, and individuals who have been granted the privilege to sponsor: [Log in to Sponsorship Manager](#) and then follow the online instructions for sponsoring a person or a shared email account.

Others needing to sponsor: Please work with your immediate supervisor to have sponsorship authority granted to you via [Authority Manager](#).

You must have at least the following information about the participant to begin the process:

- Intern’s first and last name
- Date of birth
- Working personal email address

More instructions for creating a SUNet ID can be found at:

How to sponsor an account in Sponsorship Manager: <https://uit.stanford.edu/service/sponsorship>.

Instructions for the person setting up a new SUNetID:

https://uit.stanford.edu/service/accounts/create_sponsored_sunetid

Required Intern Training

NOTE Principal Investigator must review the [Health & Safety Requirements for Minors in Laboratories at Stanford University](#); see especially Section 4.0 which lists restricted activities and additional requirements for minors.

Once a SUNet ID is “sponsored,” (see section below) the student intern is ready to complete the required Health and Safety online training. The expectation is the intern will complete all required training and send documentation to the lab contact prior to the first day of the internship. Any additional in-person lab-specific training that is required must be provided by the lab on the first day of the internship.

1. Visit <https://axess.stanford.edu/> and log in using your SUNet ID and password.
2. Click on STARS (All Learning) tab at top.
3. Click on OPTIONS button (right bottom) to find Search Catalog. Search for the required courses, one at a time, by entering the course code (e.g., EHS-4200) in the Search Catalog text box. Note: you must insert a hyphen between EHS and the course number.
4. Once you find the course, make sure it is the Web (self-paced) version and click on “Enroll,” then “Continue.” (This can take a few seconds; be patient.)
5. Once you have signed up for a course, you can begin it by clicking the “launch” button. (Make sure pop-up windows are enabled on your browser.)
6. Click on the course titles for more insight into how long course will take and what to expect. You can take part of a course, then save your work and return later.

All student interns must complete:

- EHS 4200**: General Safety, Injury Prevention (IIPP) and Emergency Preparedness

Other required online courses might include (verify with supervisor if required):

- PRIV-20**: HIPAA/Protecting Patient Privacy 2021

- EHS-PROG-1600** Bloodborne Pathogens

If the student is working with human blood or [other potentially infectious material](#) (OPIM), they must complete the University’s online Blood borne Pathogen (BBP) training course.

- EHS-PROG-2700** DOT: Shipping Dangerous Biological Goods or Dry Ice
- EHS-1500** Biosafety
- EHS-1900** Chemical Safety for Laboratories (required of all interns working in chemistrylabs)
- EHS-2200** Compressed Gas Safety
- EHS-5275** Working Safely near Radioactive Materials

*Other trainings may be required, refer to [this document](#) and check with department for verification.

Mentor/Supervisor Guidelines and Expectations

1. Mentor agrees that intern will not be left alone in a research lab but will have the supervision of mentor or a lab member at all times.
2. Mentor agrees that intern will not be given a card key or personal after-hours access to any Stanford building.
3. Mentor agrees to provide (or arrange for another lab member to provide) all necessary lab-specific Health & Safety training to intern on the intern's first day in the lab.
4. Mentor agrees to uphold the Stanford Code of Conduct (found at <http://adminguide.stanford.edu/1.pdf>).
5. Mentor has read and agrees to adhere to Stanford's Policies on [Sexual Harassment](#) and [Consensual Sexual or Romantic Relationships in the Workplace and Educational Setting](#).

Protection of Minors Policy Requirements for Non-Employee Minor Intern in a Lab

6. Internship must be registered in [ePOM](#)
7. Lab staff who will be working directly with, supervising, or otherwise overseeing minors participating in the program or activity must complete online training module *Working with Minors at Stanford* and Stanford Mandated Reporter Acknowledgment. Please use code "[WWM-PROG-2000 in STARS](#)." Lab staff who will be working directly with, supervising, or otherwise overseeing minors participating in the program or activity must clear a Live Scan Background Check.
8. All staff in the lab should read the [Guidelines for Appropriate Behavior with Minors](#).
9. Follow all [Protection of Minors Policy Requirements for Stanford Programs](#).

Process for Library Access & Obtaining Library Borrowing Privileges (Optional)

A SUNet ID allows interns to access library materials, but not to check them out. Contact Mario Pamplona, Operations Manager, Privileges, pamplona@stanford.edu, 650-498-0679 to find out how to arrange this access.

It costs \$10 per person to arrange borrowing privileges. You may request these privileges for interns who will be in your lab for 6 or more weeks. You can find the procedure here:

<https://docs.google.com/document/d/1BRgSest7E4XeljmnLmP5houT3U1uPreOVlxQ7N8Y22w/edit?usp=sharing>

You will be notified when the card is ready for pick-up. Interns go to Green Library Circulation Desk during their operational hours in order to finalize the card issuance. They should bring photo ID and know their SUNet ID. Interns will complete application at the Circulation Desk. Library will take their photo, add their contact information into the SUL system, and print the card. This should take about 5 minutes.

Questions?

Mario Pamplona, Operations Manager, Privileges, pamplona@stanford.edu

Instructions for Getting Intern Paid (Optional)

Read the questions related to Internship or Employment on page 3. If you and your HR Manager agree that your project is an internship, the intern can be paid a stipend or not. Stipends are lump sum payments (not hourly) and they can be in any amount (there are no restrictions about minimum wage). They are meant to compensate the intern for transportation and other expenses incurred as part of the internship. Stipend amounts are agreed to upfront. Typically half of the stipend is paid at mid-point and half at end of the internship.

Stipends are paid via an SU-21 form, found at <http://web.stanford.edu/group/fms/fingate/docs/su21.pdf>.

The step-by-step process for completing an SU-21 to pay a stipend can be found in Fingate.

https://web.stanford.edu/group/fms/fingate/staff/suptstudents/quick_steps/request_subs_travelgrant.html

1. It is highly recommended, that in the Remarks section the department administrator indicates which Expenditure Type to use. Only 4 Expenditure Types can be used on the SU-21: 52435 or 52436 (NSF Participant Support Costs), 57860 (Non-matriculated Student Aid), or 57820 (Student Aid High School Students).
2. Although the form doesn't ask for it, department administrator may want to include intern's SUNet ID somewhere. And for first-time payees not affiliated with Stanford previously, Payroll also requires the payee's SS#.
3. You will find the intern's Employee ID when you confirm that they have completed their online safety training. See page 6 (at very bottom) for how to find this number to enter on the SU-21.
4. Instructions for sending to Payroll are found at the bottom of the SU-21.
5. Be sure to make copy for department records before sending form and documentation to Payroll. It typically takes 7-10 days to receive check.
6. Follow all [Protection of Minors Policy Requirements for Stanford Programs](#).

Question about completing SU-21 forms? Contact is Tina Wirattigowit. peangjun@stanford.edu

If you and your HR Manager agree that this project constitutes employment rather than an internship, your HR manager will help you with appropriate paperwork, including a Work Permit from student's school and other employment documents and procedures.

Miscellaneous Information

If intern will be working with lab animals, there are additional requirements and documentation, described at <https://labanimals.stanford.edu/resources/faq/protocolfaq.html#highschool>

Consult Stanford's Administrative Guide for policies on:

- Health & Safety Requirements for Minors in Stanford Laboratories <http://www.stanford.edu/dept/EHS/prod/mainrencon/occhealth/11-038.pdf>
- Exclusion of Minors in the Workplace http://elr.stanford.edu/forms/Children_Work_10_02.pdf
- Sexual Harassment and Consensual Sexual Relationships http://adminguide.stanford.edu/23_2.pdf
- Protection of Minors <https://adminguide.stanford.edu/chapter-1/subchapter-8/policy-1-8-1>

Other FAQs

Can minors holding internships live in campus residences for the summer?

The simple answer is "No." Only minors participating in the university's formal residential programs are allowed to live on campus since they must have adult supervision evenings and weekends.

May my department or I arrange or offer housing for minors holding an internship in my lab?

The simple answer is "No." This puts an untenable liability burden on you, your department and the university.

Can international students who are minors hold internships on campus?

Usually not but check with Stanford's Bechtel International Center at internationalstudents@stanford.edu.

Participant Name _____

Consent Form for Being Present in Potentially Hazardous Areas

Participant and Parent (if Participant is under 18, collectively "Participant") understand that he/she will be present in potentially hazardous areas (e.g., laboratories, warehouses, shops) within Stanford University.

Participant will be:

- provided necessary personal protective equipment;
- provided appropriate safety training* and direct supervision from trained staff;

OR

- personally accompanied at all times by the designated University sponsor who is trained and knowledgeable of the area’s potential hazards.

* Documented safety training will include:

- General safety (including emergency procedures & personal protective equipment)
- Site-specific safety training (i.e., chemical safety, radiation safety, blood borne pathogens)

Participant is aware of and accepts the risks and dangers of entering and being present in potentially hazardous areas under the conditions stated above. Participant agrees to contact lab supervisor if s/he has any concerns or questions after completing safety training.

Participant Signature _____ **Date** _____

Parent/Guardian Signature (if participant is under 18 years old at the start of the internship)

_____ **Date** _____

Parent or Guardian Name Printed: _____

(The section below is to be completed by the supervisor of the potentially hazardous area after student has completed the training.)

I attest that the minor named above has received safety training as necessary and that I have specifically designated an adult University sponsor who is trained and knowledgeable of the area’s potential hazards to directly supervise and/or personally accompany the minor within the potentially hazardous work area. This document will be kept on file by the associated lab.

Area Supervisor/Safety Officer

Signature

Date

Stanford Intern Code of Conduct

Stanford interns are expected to adhere to the highest standards of good citizenship, honesty, and integrity in their academic work and in their personal conduct.

- Interns are expected to show courtesy and respect for their fellow students, for Stanford University personnel, and for University visitors.
- Interns shall not take part in or facilitate discrimination of any kind, including, but not limited to, discrimination based on gender, race, national origin, ethnicity, age, religion, sexual orientation, disability, handicap, or intelligence.
- Interns are expected to show respect for and take reasonable care of University property, including laboratories, classrooms, and other Stanford facilities, equipment and furnishings (for instance, course materials, computers, sports equipment, street signs, and other structures in outdoor areas).
- Interns are expected to respect the belongings of their fellow students. They shall not borrow, use, or disturb items belonging to other students or staff without clear prior permission. Interns also are expected to respect the belongings of the participants of other programs at Stanford, and other Stanford visitors.
- Interns shall not use, possess, or distribute alcohol, tobacco, or drugs, with the exception of prescription and over-the-counter medications.
- Interns are expected to be well-behaved and follow the instructions of the residential staff, instructional staff, and other University personnel. Unruly behavior will not be tolerated.
- Interns shall not commit acts of violence on persons or property, nor shall they threaten to commit any act of violence.
- Interns shall not engage in any form of sexual harassment. Sexual harassment includes sexual conduct, or conduct with sexual overtones, which has the purpose or effect of unreasonably interfering with an individual's academic or work performance or which creates an intimidating, hostile, or offensive learning, residential, or working environment.
- Interns shall uphold high standards of academic integrity through honesty, trust, fairness and responsibility. Interns are expected to demonstrate a spirit of cooperation and exploration within the academic guidelines provided by their instructors, and to meet the intellectual challenges of their internship through honest effort and hard work.
- Interns are expected to know and to follow all rules listed in this Code of Conduct.

Participant Commitment and Acknowledgement Form (Optional)

(This form is optional. If used, the host lab/department will need to tailor it to the specific internship.)

I, _____ Intern name _____, am voluntarily participating in a paid/unpaid internship at Stanford University's _____ (Name of lab/department) _____. I understand that this is a rigorous program, and it requires substantial commitment on my part. I understand it is of primary importance that I participate with the intention of making this a rewarding experience for myself and my hosts.

Furthermore, I understand that my host lab/department has the right to terminate our relationship at any time, in the event that Stanford or the host lab has determined, in its sole discretion, that such release is in Stanford's best interest, or in my best interest.

By signing this form, Participant and Parent (if Participant is under 18, collectively "Participant") understand Participant will participate in this internship on Stanford campus from Approximate start date to Approximate end date. The person at Stanford who is supervising my work is Name of mentor and the person in charge of the lab is Name of PI.

Participant hereby grants Stanford and its representatives, employees, agents, and assigns, the irrevocable and unrestricted right to use, reproduce and publish Participant's image, including photographs, videos, and likenesses, for editorial, trade, advertising or any other purpose and in any manner and medium now known or hereafter created to alter the same without restriction; and to copyright the same. Participant hereby releases Stanford and its trustees, officers, employees, agents, legal representatives and assigns from any and all claims, actions and liability relating to its use of such images.

Participant acknowledges that s/he has read and agrees to follow the Stanford Sexual Harassment Policy Guidelines and the Stanford Code of Conduct found in this packet.

Participant Signature _____ **Date** _____

Parent/Guardian Signature (if participant is under 18 years old at the start of the program)

_____ **Date** _____

Parent/Guardian Name Printed: _____

Participant Name _____

Field Trip Permission Slip (Optional)

(This form is optional but necessary if intern will be driven by any university personnel or students as part of the internship.)

I hereby give my permission for the intern named above to **ride in vehicles driven by university faculty, staff or graduate students** that are part of this internship.

Yes No

Participant Signature _____ **Date** _____

Parent/Guardian Signature (if participant is under 18 years old at the start of the internship)

_____ **Date** _____

Parent or Guardian Name Printed: _____