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UNIT 29351
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AEPE-C

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MEMORANDUM FOR HQ USAREUR Staff Principals and Commanders of USAREUR Major Subordinate Commands and Other Organizations in the Army in Europe

SUBJECT: USAREUR Local National Internship Program in Germany (AE Cmd Memo 2016-038)

This memorandum expires in 2 years.

1. Supersession. This memorandum supersedes memorandum, USAREUR, AEPE-C, 9 September 2015, subject: Initial Guidance for the USAREUR Local National Internship Program (AE Cmd Memo 2015-049).

2. References:

- a. *Arbeitszeitgesetz (ArbZG)* (German Work Time Law).
- b. *Aufenthaltsgesetz (AufenthG)* (German Residence Law).
- c. *Berufsbildungsgesetz (BBiG)* (German Vocational Training Law).
- d. *Bundesurlaubsgesetz (BUrlG)* (German Federal Leave Law).
- e. *Entgeltfortzahlungsgesetz (EntgFG)* (German Continued Pay Law).
- f. *Freizügigkeitsgesetz (FreizügG/EU)* (Freedom of Movement Act/European Union).
- g. *Sozialgesetzbuch IV (SGB IV)* (German Code of Social Law IV).
- h. *Sozialgesetzbuch V (SGB V)* (German Code of Social Law V).
- i. *Tarifvertrag vom 16. Dezember 1966 für die Arbeitnehmer bei den Stationierungsstreitkräften im Gebiet der Bundesrepublik Deutschland (TV AL II)* (Collective Tariff Agreement II (CTA II)).
- j. [AE Regulation 190-16](#), Installation Access Control.
- k. [AE Regulation 604-1](#), Local National Screening Program (LNSP) in Germany.
- l. [AE Regulation 690-70](#), Recruitment and Staffing for Local National Employees in Germany.
- m. [AE Form 190-16A](#), Application for Installation Access.
- n. [AE Form 604-1B](#), Security Questionnaire for a Simple Security Check.

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- o. [AE Form 690-70A](#), *Bewerbung*/Application.
- p. DD Form 1172-2, Application for Identification Card/DEERS Enrollment.

3. Applicability. The policy in this memorandum applies to HQ USAREUR staff offices and USAREUR major subordinate commands (MSCs). Other organizations in the Army in Europe may voluntarily participate in the program. This program is applicable only in Germany.

4. Purpose. The primary purpose of the USAREUR Local National Internship Program is to provide a unique learning experience to university students in Germany. The program is designed to allow talented university students to learn side by side with supervisors, employees, and mentors in USAREUR. This will enable USAREUR organizations to gain knowledge and new perspectives from interns while providing interns training and experience with the U.S. Forces within their academic areas of study.

5. Policy. All Army in Europe organizations may offer internships under the USAREUR Local National Internship Program. This program will provide training opportunities for a specific period to students who are enrolled full-time in a university or who graduated from a university within 6 months before starting an internship. During the internship, students will gain knowledge that will help further their academic studies and enhance their skills through real-world experiences. The emphasis of this program is on providing meaningful training; the program in no way relates to any aspects of current or future employment.

a. The Local National Internship Program will support USAREUR's theater-engagement strategy.

b. This policy does not determine the establishment of funding required in support of the program. Units who participate in the program are required to provide funding for interns.

c. Two types of internships are available:

(1) Voluntary Internships (*Freiwillige Praktika*). This is the most common type of internship. Few formal requirements exist. The purpose of voluntary internships is to offer opportunities to impart experience and knowledge for the professional orientation process of the student. The provisions of Article 26 of the German Vocational Training Law (*BBiG*) apply.

(a) Interns who attend university while performing an internship will generally be scheduled to perform a maximum of 20 hours per week. During semester breaks, these students may request to perform more than 20 hours per week, but management may not approve more than 38.5 hours. The increase in hours must not interfere with academic

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studies. Interns who have already graduated from university may also perform up to 38.5 hours a week.

(b) A voluntary internship is limited to 3 months per year and will be compensated in accordance with German minimum-wage provisions.

(c) Interns are entitled to proportional annual leave commensurate with the number of scheduled duty days per week in accordance with the *BBiG* and the *BUrlG*.

(d) Interns are entitled to paid sick leave after 4 weeks of continued appointment in accordance with the German Continued Pay Law.

(2) Mandatory Internships (*Pflichtpraktika*). Mandatory internships are regulated by university study regulations (*Studienordnungen*) and can be offered if commands and mentors can meet the requirements in the respective regulation for mandatory internships. The period of the internship and the regular hours performed must correspond to the student's university training plan. These internships will be compensated in accordance with German minimum-wage provisions. Students may be assigned to different functional areas, but management must closely coordinate the training provided with the university. The *BBiG* does not apply to mandatory internships. Students are not entitled to annual leave or paid sick leave during mandatory internships.

d. Duty hours will normally be between 0600 and 2000. Interns will not be scheduled for normal duty on Saturdays, Sundays, or German legal holidays unless required to meet learning objectives. (In this case, the intern's supervisor should contact the USAREUR Local National Internship Program Coordinator for guidance.) Provisions and agreements related to the CTA II ([ref 1i](#)) and "shop-agreement days" will not apply, and U.S. holidays are not considered paid holidays for interns. In accordance with the German Work Time Law, for interns who are scheduled for more than 6 and up to 9 hours a day, breaks must total at least 30 minutes. Interns who are scheduled to work more than 9 hours a day must take breaks for a total of 45 minutes. The total break time may be divided into individual breaks of at least 15 minutes. Interns who are scheduled to work no more than 6 hours consecutively are not required to take a break.

e. According to [AE Regulation 190-16](#) and [AE Regulation 604-1](#), students are required to submit a Good Conduct Certificate (GCC) (*Führungszeugnis*) and complete an AE Form 604-1B for LNSP screening. The sponsor will submit the AE Form 604-1B to the responsible United States Army garrison (USAG) security officer to start the screening process. Sponsors are also responsible for submitting a completed AE Form 190-16A and a copy of the student's GCC and national ID card (*Ausweis*) or passport to the appropriate USAG installation access control office before the start of the internship. After AE Form 190-16A has been processed and the LNSP screening has been conducted and shows

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favorable results, the student will be issued a common access card (CAC). The CAC will provide access to installations and the computer network. Since the LNSP screening may take up to 60 days, AE Form 604-1B should be submitted as early as possible before the internship. An installation pass may be issued for installation access only if the LNSP screening is still pending when the internship begins.

f. Commanders, directors, and agency heads will ensure that each intern has a supervisor or mentor. The supervisor or mentor must complete an internship plan that includes details about training goals and contents, duties the intern must perform to achieve these goals, and scheduled duty hours and days. Interns must be released for academic responsibilities and university lectures, if necessary. After completion of the internship, the intern is entitled to a certificate of completion and a qualified testimonial.

g. If applicable, internships will be established and implemented in accordance with the provisions in the *SGB IV* and *SGB V* concerning short-term employment (*Sozialversicherungsfreiheit bei kurzfristiger Beschäftigung*). Participation in German Retirement and Social Insurance plans (*Renten- und Sozialversicherungspflicht*) may be required in accordance with the applicable provisions of the *SGB IV* and *SGB V* in individual cases.

h. The provisions of the CTA II do not apply to internships. In accordance with [paragraph 5](#) above, internships will not be used to substitute for regular employment. Also, participation in an internship will not constitute an entitlement to regular employment. Interns who apply for regular employment will be considered external applicants.

i. Selected interns will be provided an additional benefit for reimbursement of actual transportation expenses for the initial travel to and the last travel from the internship place of duty. This benefit will not exceed 600 euros total for the internship and is not intended to reimburse the intern for daily commuting costs.

j. At the completion of the internship, the intern will be given the opportunity to provide an evaluation of his or her experience as an intern.

6. Eligibility. Applicants must meet the following requirements to be considered for placement through the Local National Internship Program:

a. Be at least 18 years old.

b. Be a current full-time university student or a student who graduated from a university within 6 months before starting the internship.

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c. If not a German citizen, meet residency and employment requirements in accordance with the German Residence Law or the European Union Freedom of Movement Act (*Aufenthaltsgesetz* or *Freizügigkeitsgesetz/EU*).

d. Receive a favorable LNSP security background screening to obtain access to U.S. Army installations and DOD computer networks in accordance with the requirements of [AE Regulation 190-16](#) and [AE Regulation 604-1](#). Individuals must have 12 months residency in Germany in order for an LNSP screening to be completed.

e. Participate in the program for at least 8 continuous weeks up to a maximum of 3 months. (The length of the internship will be in accordance with German Social and Labor Law.)

NOTE: The provisions of the U.S. Classification Act do not allow U.S. citizens and U.S. dual citizens to be considered for placement under the USAREUR Local National Internship Program.

7. Responsibilities.

a. The Civilian Personnel Directorate (CPD), Office of the Deputy Chief of Staff, G1, HQ USAREUR, will—

(1) Exercise overall responsibility for planning, coordinating, and executing the USAREUR Local National Internship Program.

(2) Appoint the USAREUR Local National Internship Program Coordinator.

b. The USAREUR Local National Internship Program Coordinator will—

(1) Advise managers on intern recruiting procedures and process all recruitments.

(2) Market the Internship Program. In support of this process, the USAREUR Local National Internship Program Coordinator will coordinate for collection and submission of opportunities before the end of each fiscal year and, before the end of each calendar year, market these opportunities with universities to attract interested students for the following calendar year.

(3) Forward required documents to and coordinate payment by the Foreign Forces Payroll Office (*Lohnstelle ausländische Streitkräfte*).

(4) Ensure selected candidates submit required documents (résumé or curriculum vitae, cover letter, proof of university enrollment (*Immatrikulationsbescheinigung*), a GCC, AE Form 604-1B, and AE Form 690-70A).

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(5) Coordinate the internship plan with the intern's supervisor and assist in coordinating the university training plan and requirements for mandatory internships, if applicable.

(6) Coordinate the intern's leave and absences with the intern's supervisor.

(7) Provide a certificate of completion to the intern through the intern's supervisor.

(8) Evaluate the Local National Internship Program.

(9) Coordinate with local civilian personnel advisory centers (CPACs) to complete selection, on-boarding requirements, and inprocessing.

c. HQ USAREUR staff principals and MSC commanders will—

(1) Appoint a local liaison to coordinate intern placement with the USAREUR Local National Internship Program Coordinator.

(2) Identify opportunities within their organizations for the assignment and development of interns.

(3) Request funding through their resource management office.

(4) Appoint an individual to serve as a sponsor and mentor for each intern.

d. Supervisors and mentors of LN student interns will—

(1) Interview intern applicants.

(2) Select candidates.

(3) Establish an internship plan in coordination with the intern and, in case of a mandatory internship, in accordance with the requirements of the applicable university regulation.

(4) Submit monthly time-and-attendance reports to the USAREUR Local National Internship Program Coordinator or local organization POC.

(5) Explain the conditions of the nondisclosure agreement and have the student sign the agreement.

(6) Coordinate all training-related matters closely with the intern.

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- (7) Provide an adequate environment and required equipment for the intern.
 - (8) Provide the intern a qualified testimonial on his or her last day of training. Testimonials will be signed by the first colonel or GS-15 in the chain of command.
- e. Servicing CPACs will—
- (1) Coordinate and complete an intern contract between management and the intern.
 - (2) Process LNSP screenings in accordance with the requirements in [AE Regulation 190-16](#) and [AE Regulation 604-1](#).
 - (3) Inform the local organization's agency representative to obtain local works council concurrence in accordance with locally established procedures for selecting and placing interns.
 - (4) Complete DD Form 1172-2 with and provide the completed form to the intern.
 - (5) Send required documents to the USAREUR Local National Internship Program Coordinator and keep file copies.

8. Participation of Commands and Organizations Other Than HQ USAREUR.

Commands and organizations other than HQ USAREUR will identify the need and suitability of their organizations for LN student interns. If participation in the USAREUR Local National Internship Program is desired, they will appoint a local POC to coordinate recruitment and placement with the USAREUR Local National Internship Program Coordinator. Funding of the intern must be provided by the requesting command or organization. Marketing and recruiting will be centrally managed by the USAREUR Local National Internship Program Coordinator.

9. POC. The proponent of this memorandum is the CPD, Office of the Deputy Chief of Staff, G1, HQ USAREUR.

FOR THE COMMANDER:



MARKUS T. LAUBENTHAL
Brigadier General, GS
Chief of Staff