



# Management Directive

## Commonwealth of Pennsylvania

### Governor's Office

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## Management Directive 515.21 Amended – High School Internships

Date: October 12, 2023

By Direction of:

A handwritten signature in black ink, appearing to be 'N. Weaver'.

Neil R. Weaver, Secretary of Administration

Contact Agency: Office of Administration  
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**This directive establishes policy, responsibilities, and procedures for the referral and appointment of candidates for High School Internships in the Commonwealth. The directive is amended to update the title, formatting, policy, responsibilities, and procedures and to add definitions.**

### 1. PURPOSE.

To establish policy, responsibilities, and procedures for the recruitment, referral, and appointment of candidates for High School Internships in the Commonwealth.

### 2. SCOPE.

This directive applies to all departments, offices, boards, commissions, and councils under the Governor's jurisdiction for human resources management (hereinafter referred to as "agencies").

### 3. OBJECTIVES.

- a. To standardize the recruitment, referral, and appointment of candidates for High School Internships in the Commonwealth.
- b. To educate high school students about possible job opportunities with the Commonwealth.

- c. To provide safe and rewarding work-based learning opportunities to high school students, which enable them to better define career interests and goals, and to further develop their technical and soft skill sets.

#### 4. DEFINITIONS.

- a. **High School Intern.** A high school student who is appointed to a High School Internship.
- b. **High School Internship.** A temporary, paid full-time or part-time position with an agency, in a non-civil service job classification, which provides an opportunity for a high school student, who is appointed as a High School Intern, to receive an introductory, Work-Based Learning experience in a specific profession.
- c. **Statement of Responsibilities.** A document that outlines the basic responsibilities of the agency, the High School Intern, and the school, and is signed by the respective parties and kept on file by both the agency and the school.
- d. **Training Plan.** A document that outlines the types of on-the-job, Work-Based Learning experiences and anticipated learning outcomes the High School Intern will complete, as well as the work-based competencies they will learn, during the High School Internship.
- e. **Work-Based Learning.** An educational strategy that provides high school students with real-life work experiences, where they can apply academic and technical skills and develop their employability.

#### 5. POLICY.

- a. The Commonwealth recognizes the importance and value of providing high school students with Work-Based Learning opportunities, which allow them to explore their vocational interests while developing transferable skillsets that increase their post-graduation employability. To that end, the Commonwealth is devoted to maintaining diverse High School Internship opportunities for qualified high school students.
- b. High School Internship opportunities will be made available for application via the Commonwealth's employment recruitment website ([www.employment.pa.gov](http://www.employment.pa.gov)).
- c. High school students who are interested in applying for a High School Internship must:
  - (1) Be age 16 or older;
  - (2) If necessary, possess a valid work permit issued by their school;
  - (3) Have completed their sophomore year of high school prior to starting the High School Internship; and

- (4)** Be recommended by a representative of their school for participation in the High School Internship.

  - (a)** Recommendations must be in the form of a letter and may come from a teacher, advisor, counselor, or other school official who can attest to the student's eligibility, based on the school's requirements, for a High School Internship.
- d.** Agencies must comply with the *Child Labor Act, Act of October 24, 2012, P.L. 1209, No. 151, 43 P.S. §§ 40.1–40.14*, when hiring and employing High School Interns. Careful attention must be given to the provisions of the *Child Labor Act* that address prohibitions and limitations on certain occupations or services in which minors may be employed, *43 P.S. §§ 40.4–40.7*, and on hours of employment for minors, *43 P.S. § 40.3*. Agencies must also ensure they do not violate the *Child Labor Act* when permitting students to work overtime, *43 P.S. § 40.3*.
- e.** The Abstract of the *Child Labor Act* Hours Provisions (Form LLC-5), which is issued by the Pennsylvania Department of Labor and Industry, Bureau of Labor Law Compliance, must be posted in a conspicuous place where any person under the age of 18 is employed, and a schedule of hours for minors must be posted and kept current. Violations of the *Child Labor Act* are subject to potential penalties as set forth in *Section 11* of the *Child Labor Act, 43 P.S. § 40.11*.
- f.** High School Interns may be employed in any agency program area, as long as the agency is able to accommodate the student's field of interest and the employment is not in an occupation or service prohibited by the *Child Labor Act*.
- g.** A high school student who is under the age of 18 and has been appointed to a High School Intern position must, prior to starting the High School Internship, provide to the agency a copy of the high school student's valid work permit. A copy of the high school student's work permit will be maintained in their Electronic Official Personnel Folder (e-OPF), in accordance with the *Child Labor Act* and *Management Directive 505.18 Amended, Maintenance, Access, and Release of Employee Information*.
- h.** High School Internships may begin on or after July 1 and continue until June 30 of the following year. However, the starting date for the High School Internship may vary, depending on the needs of the agency and the student. Students have two options:

  - (1)** Start in the summer, working a full-time schedule, and continue in that position into the fall, working a part-time schedule; or
  - (2)** Start in the fall, working a part-time schedule.
- i.** Schedules and work hour requirements will vary among school districts. Students may work full-day shifts on school holidays in which the Commonwealth is open for business.

**6. RESPONSIBILITIES.**

- a. Office of Administration (OA), Bureau of Enterprise Recruitment** shall:
- (1) Build networks with Pennsylvania schools and academic organizations.
  - (2) Assist agencies with recruitment efforts, upon request, for High School Intern candidates.
  - (3) Meet with schools and/or high school students to discuss High School Internships and other employment opportunities with the Commonwealth.
  - (4) Provide program guidance, training, and clarification to agencies regarding the High School Internship program.
- b. OA, Bureau of Talent Acquisition (BTA)** shall post High School Internship opportunities to the employment website and refer qualified candidates to the agency.
- c. Human Resource (HR) Staff Supporting the Agency** shall:
- (1) Work with agency staff to identify High School Internship opportunities in which high school students may participate.
  - (2) Coordinate the posting of High School Internship opportunities, which will be available for application via the Commonwealth's employment recruitment website ([www.employment.pa.gov](http://www.employment.pa.gov)).
  - (3) Provide guidance to hiring managers throughout the High School Internship hiring process.
  - (4) Ensure that Child Abuse History Certification checks are completed for agency employees who are supervising a High School Intern.
  - (5) Assist supervisors in identifying employment opportunities for High School Interns who successfully complete the High School Internship.
- d. Agency Supervisors** shall:
- (1) Work with the school to develop a detailed Training Plan, which outlines the learning objectives, requirements, and proposed work projects and duties.
  - (2) Review and complete a Statement of Responsibilities, which outlines the responsibilities of the agency, the High School Intern, and the school.
  - (3) Complete an evaluation of the High School Intern's performance at the end of the High School Internship or as otherwise required by the school.

- (4) Coordinate with HR staff in identifying employment opportunities for High School Interns who successfully complete the High School Internship.

## 7. PROCEDURES.

- a. **High School Internship Vacancies** are posted for application via the Commonwealth's employment recruitment website ([www.employment.pa.gov](http://www.employment.pa.gov)).

- (1) High school students who are interested in a High School Internship must complete and submit an online application. A request to hire a High School Intern may also come directly from a high school student, a school, or an agency. Where such direct requests are made, the high school student must still complete and submit an online application.
- (2) High school students must upload their letter of recommendation as an attachment to their online application.

- b. **Evaluation and Selection of Applicants.**

- (1) High School Internships will be filled by the best available candidates.
- (2) If multiple candidates are being considered for a High School Internship, the agency must conduct interviews and assess all candidates prior to making a selection.
- (3) All candidates must be notified of their selection or non-selection for a High School Internship position.
- (4) A conditional offer of employment shall be made to the selected candidate and, thereafter, all required background checks must be completed in accordance with *Management Directive 515.15 Amended, Hiring-Related Verification and Background Checks*, prior to the selected candidate receiving a final offer of employment.

- c. **Child Abuse History Certification Checks.**

- (1) The *Child Protective Services Law (CPSL), 23 Pa.C.S. §§ 6301–6388*, requires certain individuals to obtain clearances to work with a minor. Prior to the start of a High School Internship, the supervisor of the High School Intern must successfully complete a Child Abuse History Certification check in accordance with the *CPSL*. This check includes the following required child clearances: the PA Child Abuse History Clearance; the PA State Police Criminal History Clearance; and the Federal Bureau of Investigations (FBI) Criminal History Clearance.
  - (a) If a supervisor already has valid clearances in their e-OPF, and those clearances will remain valid for the entirety of the High School Internship, the supervisor does not need to undergo a new clearance check. If any of the supervisor's clearances will

expire during the High School Internship, or if a supervisor does not have all required clearances in their e-OPF, the supervisor must complete all appropriate checks prior to the start of the High School Internship.

- (b) Where it is necessary to complete a Child Abuse History Certification check, HR staff will work directly with the supervisor to ensure prompt completion of all required clearances.
  - (c) If a supervisor is unable to pass one or more of these clearances, the agency should determine if they want to proceed with the High School Internship. If so, a new supervisor would need to be identified and would follow the Child Abuse History Certification Checks process as outlined in this directive.
- (2) Child Abuse History Certifications will be uploaded to the supervisor's e-OPF and will remain on file until no longer valid.
- d. **The Statement of Responsibilities** must be signed by all necessary parties prior to the start of the High School Internship.
  - e. **The Training Plan** must be developed, approved by the school, and signed by all necessary parties prior to the start of the High School Internship. The supervisor of the High School Intern is responsible for working with the school to ensure all appropriate parties approve and sign the Training Plan.
  - f. **A copy of the high school student's work permit**, if necessary, must be obtained by the supervisor of the High School Intern prior to the start of the High School Internship.
  - g. **A copy of the Statement of Responsibilities, Training Plan, and work permit**, if applicable, will need to be filed by the agency or HR Staff Supporting the Agency in the High School Intern's e-OPF.

**This directive replaces, in its entirety, *Management Directive 515.21 Amended*, dated February 14, 2006.**