FREQUENTLY ASKED QUESTIONS FOR SUPERVISORS OF HIGH SCHOOL INTERNS

<u>AGE</u>

What is the minimum age and are there special exceptions.

Minimum is age 16 and student must be officially in junior-year or senior-year status on start date (time of hire). There are <u>no</u> exceptions.

What defines a "minor"?

Any student UNDER age 18. For the High School Internship Program, the minimum age is 16 by start date (time of hire).

AGENCY-RELATED QUESTIONS

For agencies like Department of Corrections, State Police, etc., that have rather specific age requirements, is this program an option?

Interested supervisors should consult with their manager and HR Liaison. For example, limited opportunities may exist in the agency's central office/headquarters or other work areas that are outside of age-specific areas. The agency may need to consult with its legal office. (See additional guidance under <u>Duties of High School Interns</u>.)

How is the intern payroll budgeted?

This program will use the High School Intern classification, job code U2540, in a wage capacity. Please discuss payroll/complement items with your HR liaison. As the service-type is "unclassified," it should not count against an agency's limit/allotment for wage positions. Questions can be directed to the agency's HR Office Complement Manager or the Office of Administration, Bureau of Organizational Management (BOOM).

CONFIDENTIALITY

Are high school interns able to work with confidential information?

The agency and its HR office will need to determine the amount and type of information the high school intern can work with during the program. The agency should consult with its legal office on specific procedures, as necessary.

Are there any confidentiality forms a high school intern needs to sign?

There are no confidentiality forms the High School Intern Program requires. However, each agency can determine if it has a confidentiality form that needs to be signed at time of hire.

CHILD CLEARANCES

Who do we need to work through for child clearances?

Contact your HR Liaison to follow the established procedures for the High School Intern Program. If HR Liaisons have questions on child clearances, they can <u>e-mail</u> the Office of Administration, Bureau of Talent Acquisition, Background Check and Hire Division (BTA–BCHD).

In the work unit where the high school intern will work, who will need child clearances? *

The employee who is responsible for the direct care, safety, and well-being of the minor must have/obtain the three child clearances. The direct supervisor <u>must always</u> have all three full clearances (including the actual FBI fingerprints). If additional employees will be responsible for the care/safety of the minor, they may also need to have clearances—this can be discussed further with your agency's HR Office and/or your agency's Legal Office.

Does the remainder of staff where the high school intern will be working need to obtain child clearances? *

Only the direct supervisor (the individual responsible for the safety and well-being of the minor) needs child clearances. However, if there will be multiple or rotating supervisors, then all applicable supervisors must obtain the three child clearances. Consideration should also be given when the direct supervisor will be off—having a backup supervisor(s) with child clearances may be beneficial. This can be discussed further with your agency's HR Office and/or your agency's Legal Office.

* The High School Intern Program requires commonwealth supervisors to always obtain all 3 full clearances, including actual FBI fingerprints, regardless of student age. This is to ensure consistency across all participating commonwealth agencies in all 67 counties. A number of schools across Pennsylvania require the 3 full clearances for supervisors (including actual FBI fingerprints), regardless of student age. The 3 full clearances are referenced in the <u>PA Child Protective Services Law (CPSL) – Chapter 63C – Sections 6344 & 6344.2 – 6344.4</u>.

DUTIES OF HIGH SCHOOL INTERNS (PERMITTED, LIMITED, AND PROHIBITED)

What sort of duties can high school interns perform, especially in regard to specialized or higher-risk duties (such as: working with or near inmates in Department of Corrections, working on controlled fire burns or with pesticides in Department of Conservation and Natural Resources, performing vehicle repairs on a roadside with PennDOT, etc.)?

Each agency must determine the appropriate level and type of work for high school interns. Initially, if a supervisor is interested in hiring a high school intern, the supervisor should have a discussion with the local HR Liaison to determine if it is an appropriate use of the High School Intern Program. Agencies may develop a list or guidelines of the types of duties high school interns can perform. The agency may want to consult with its HR office and legal office.

Minimum age for high school interns is age 16, plus junior- or senior-year status. Supervisors and HR Liaisons must review the <u>PA Prohibited Occupations List for Minors (pages 1 - 7)</u> and <u>Federal "Off Limits"</u> Jobs Summary for Minors.

The <u>Prohibited Occupations List</u> also lists exceptions within a number of the listed occupational areas, in which high school interns can perform some duties. The exceptions are listed and apply in one of two ways:

- Exceptions for most minors (age 16 17) if applicable, will be explained in the summary of a listed occupation.
- Exceptions for minors in vo-tech (career and technical center) noted by asterisks (*) in the summary of a listed occupation and explained on Page 7 of the <u>Prohibited Occupations List</u>. This means only students in vo-tech, in a program related to the duties of the internship, can be hired for the internship. An Additional Requirement on the job posting is necessary—please discuss with your HR Liaison to ensure the Additional Requirement is listed on the job posting.

- 3. Additional resources for child labor laws:
 - a. The Prohibited List references further explanations for some occupations in:
 - i. Code of Federal Regulations (Title 29 Ch V, Parts 570.50 570.68)
 - ii. PA Code Title 34 (Chapter 11)
 - iii. PA Child Labor Act (Sections 4 and 5)
 - iv. <u>Federal Fact Sheet #43</u>
 - b. Regulatory Agency Sites:
 - i. PA Dept of Labor & Industry, Bureau of Labor Law Compliance
 - ii. U.S. Dept of Labor, Child Labor Resource Page
 - c. For questions and assistance, contact:
 - i. Office of Administration, Intern & Entry Programs Section, 717.787.8056 or <u>RA-OAEntryPrograms@pa.gov</u>
 - ii. PA Department of Labor & Industry, Bureau of Labor Law Compliance, 717.705.5969 or <u>RA-LI-SLMR-LLC@pa.gov</u>
 - iii. Your agency's legal office

EMPLOYMENT OPPORTUNITIES FOR GRADUATING HIGH SCHOOL INTERNS

Can students apply for positions as graduation approaches?

Yes, a key purpose of the High School Intern Program is to serve as a recruitment tool to fill vacancies. As graduation approaches for senior-year high school interns, determine if your interns are interested in employment. However, please do not guarantee employment. Work with your HR Liaison to identify applicable vacancies for which the interns qualify and can apply. Normal job posting and interview procedures do apply, including seniority procedures. There is <u>no</u> automatic promotion for high school interns. Start this process well in advance of the student's graduation date, and internship end date, to avoid a separation of employment for the intern.

- <u>Non-Civil Service vacancies</u> an Internal Vacancy Posting may be applicable—ask your HR Liaison if the intern's name can be referred when the posting closes (be sure the intern applies to the posting). Additionally, for positions not represented by a union/collective bargaining agreement, ask your HR Liaison if an Internal Use Only (IUO) Posting is a possibility.
- 2. <u>Civil Service vacancies</u> interns must apply to external (general public) vacancy postings.

Does the time worked during a High School Internship count toward the time needed to move into a full-time role?

There are a number of variables to this question, based on the particular title to which the high school intern is applying. For additional guidance, <u>e-mail</u> the Office of Administration, Bureau of Enterprise Recruitment, Internship and Entry Programs Section.

EQUIPMENT, MACHINERY, & VEHICLE QUESTIONS

Are high school interns permitted to ride in commonwealth vehicles?

High school interns are considered commonwealth employees because they are paid and on the complement:

- Interns Riding as a Passenger in a Commonwealth Vehicle agencies should follow their own agency-specific process and should consult their HR office or legal office with additional questions
- Interns Operating a Vehicle and Similar Equipment supervisors and HR staff <u>must</u> review <u>Federal "Off Limits" Jobs Summary for Minors</u>. Also, please see additional information further above at <u>Duties of High School Interns</u>.

FORMS - TRAINING PLAN

Will my agency develop standard <u>Training Plans</u> or does each unit/supervisor within the agency need to develop a training plan?

Supervisors should develop their own Training Plan(s) based on the tasks, competencies, and learning activities the high school interns will perform, learn, and achieve. If the agency or HR office would like to develop standard plans to be used agency-wide, that is an option—consult with your HR Liaison to determine the best process.

HOURS

Are there minimums/maximums in terms of hours high school interns can work per week?

- 1. Minors (students age 16 17, per law):
 - a. Up to 28 hours per week when classes are in session.
 - b. Up to 37.5/40 hours per week during school vacations.
 - c. Work hours prohibited between 12 midnight and 6 a.m.
- 2. Students age 18 or older: Can work up to 37.5/40 hours per week, all year long.
- 3. Required by law: The <u>Abstract of Hours</u> (Page 1 for students age 16 17) must be printed and posted with legal/HR notices in all work units where high school interns are employed.
- 4. Reminders:
 - a. <u>Maximum hours</u>: All hours listed above are maximums. It may not be feasible for interns to work the maximum. Students also have classes, homework, and other school commitments, and many are new drivers. Work with the school internship coordinator to determine a manageable schedule for the student.
 - b. <u>Minimum hours</u>: There is no requirement for minimum number of hours per shift. The recommendation is for a minimum of 3 hours per shift, to allow for a meaningful day. However, minimum hours can be discussed with school.
 - c. Minimum age for High School Intern Program is 16 (and at least junior year).

Are students able to work after 4 p.m.?

When a student is being offered a position, the supervisor will develop a schedule with the school's internship coordinator. At that time, an appropriate schedule can be discussed in accordance with the school's requirements, the supervisor's schedule, and the well-being of the student. Be sure to follow legal requirements, as discussed in first question of this section, <u>Are There Minimums/Maximums?</u>

Are High School Interns working during school hours? Or are they working outside of normal work hours?

The supervisor will discuss this with the school's internship coordinator when the student is receiving a formal offer of employment. Generally, the student will be in school for half the school day and at the internship for the other half of the school day. <u>However</u>, other variations may exist and this will vary by school. Other variations may involve working at the internship for 2 to 4 full days a week, with the remaining full days of the week at school. Or, this can include working during normal business hours of a commonwealth agency that may be outside of normal school hours. Be sure to follow the legal requirements, as discussed in first question of this section, <u>Are There Minimums/Maximums?</u>

JOB SHADOWS

Are one-day or multi-day student job shadows covered by this program?

No, there are separate procedures for student job shadows. To learn if your agency offers job shadows, please contact your HR Liaison or <u>e-mail</u> the Office of Administration, Bureau of Enterprise Recruitment, Internship and Entry Programs Section.

MISCELLANEOUS

I would like my own child to apply. Is this a conflict of interest?

If you are <u>not</u> the supervisor, it may not be a conflict of interest. Please discuss with your HR Liaison. The agency may need to consult with its legal office if standard procedures for family members/relatives are not already in place.

Are there any considerations to bring students into professional roles that require certifications, such as Registered Nurse positions?

The High School Intern Program may be able to provide students with introductory knowledge, based on the <u>Training Plan</u> document the organization develops. But, for positions that require substantial certifications, such as an RN, additional discussions will be necessary. Please consult with your supervisor and HR Liaison. You, your manager, or your HR Liaison can request a discussion with the Office of Administration, Bureau of Enterprise Recruitment, Internship and Entry Programs Section, by submitting an <u>e-mail</u>.

Is there a limit on the number of high school interns an agency or unit within the agency can hire?

Generally, there is no limit, as long as the agency can support the cost associated with the requested number of wage positions. Each agency, or work unit within the agency, in conjunction with the HR Office can determine if a request for a high school intern is suitable. If a supervisor will be responsible for more than one intern, ensure the supervisor has the time and availability to supervise multiple interns. Each High School Intern position (job code U2540) should be placed in wage status on the agency complement. If multiple students are hired, please note they may be from different schools with different procedures, working hours, special requests, etc.

- 1. As the service-type for this classification is "unclassified," it should not count against an agency's limit/allotment for wage positions.
- 2. Questions on the number of positions can be directed to the complement manager in your HR office or the Office of Administration, Bureau of Organizational Management (BOOM).

Does the agency need to have complement available in order to hire a High School Intern?

Each High School Intern position (job code U2540) should be placed in wage status on the agency complement. As the service-type for this classification is "unclassified," it should not count against an agency's limit/allotment for wage positions—questions can be directed to the complement manager in your HR office or the Office of Administration, Bureau of Organizational Management (BOOM). The agency should ensure it has funds available to pay the hourly rate for high school interns. The pay scale for the High School Intern classification is XH (Miscellaneous Hourly Rates), Pay Scale Group XH28, Pay Scale Level A.

RECRUITMENT/PROMOTION

Are schools aware of this program?

Yes, schools throughout Pennsylvania have been made aware. School internship coordinators and students should regularly check the "Intern and Apprenticeship Page" of the commonwealth employment site at <u>www.employment.pa.gov</u>. This is a real-time website with continuous updates. All high school internships are posted here. Students should apply to all applicable high school intern postings for which they are interested, for a potential interview.

Who can we work with to further promote posted internships to schools?

In advance of the posting going live, request assistance from the recruitment team of the Office of Administration, Bureau of Enterprise Recruitment, via <u>e-mail</u> or by calling 717.857.3309.

Is there a list of schools we need to work with?

No. All high school internships need to be posted on the "Intern and Apprenticeship Page" of the commonwealth employment site at <u>www.employment.pa.gov</u>. If you would like to promote your posting to area schools, request assistance from the recruitment team of the Office of Administration, Bureau of Enterprise Recruitment, via <u>e-mail</u> or by calling 717.857.3309. Be sure to contact the bureau in advance of the posting going live, to allow time to prepare a promotion plan.

Can home-schooled students be considered and apply?

Yes. They would follow the same procedures. Students and their at-home instructors can view positions, and applicable requirements, on the "Intern and Apprenticeship Page" of the commonwealth employment site at <u>www.employment.pa.gov</u>. Note: If the student is a minor (age 16 - 17), the student may need to work with the local school district to obtain the required Work Permit form.

Can students from cyber schools apply?

Yes, if the students are PA residents. We have also informed as many cyber schools as possible, that operate in PA, of this program.

POSTING A HIGH SCHOOL INTERN POSITION

To comply with commonwealth posting and hiring procedures, do we have to post positions? Would we be able to offer a position to an intern?

All high school intern positions <u>must</u> be posted as external vacancy postings on the <u>Intern and</u> <u>Apprenticeship Page</u> of the commonwealth employment website. No internship can be offered to a student without going through the vacancy posting procedure. (Internal Use Only Postings are <u>not</u> permitted. This is to ensure all students from area schools have a chance to apply for an interview, if they meet the listed requirements on the posting.)

Do high school internships need to be posted at a specific time of the year?

No, they can be posted at any time of the year. However, there are times of the year that may provide the most applicants. Keep in mind the school year runs July 1 through June 30.

- 1. <u>Posting between mid-August through November</u>. Start dates can occur right away for the current school year.
- Posting between March and early May for the upcoming school year. The earliest start date for the selected student(s) would be July 1 (later start dates in July, August, and September are also acceptable). Note: Students in a high school intern position should work through a majority of the school year. This program is <u>not</u> a summer placement program.

REQUIREMENTS - STUDENTS

Do applicants need to be Pennsylvania residents? Yes.

Can students from out-of-state high schools or career technology centers (vo-techs) be considered?

No, unless the student is a resident of Pennsylvania who attends a school across the state border.

SNOW DAYS & OTHER SCHOOL CLOSURES

Can or should students report to work when school is closed for the day?

During the formal offer, the supervisor should discuss this question with the school internship coordinator for both snow days and other school emergency closures. Each school will vary on its procedures. On school snow days, <u>some</u> schools may permit the student to report to the internship if the storm does not materialize or if roads are clear and safe.

Details for schools that permit students to report to the internship on snow and emergency closure days:

- 1. SAFETY IS ALWAYS PARAMOUNT!
- 2. Remind students that in <u>each</u> storm or other school closure situation, they must first receive permission from their parents/guardians.
- 3. Also remind students to always check the full weather forecast. The forecast may indicate weather conditions will worsen and will be bad at quitting time. Will the student be able to return home safely?
- 4. High school interns can <u>never</u> be mandated to report to work in bad weather, any type of emergency, or any other situation in which school classes have been cancelled for the day.
- 5. Please keep in mind that high school interns are relatively new drivers and may have very little experience driving in winter weather and other hazardous conditions.

SUPERVISING HIGH SCHOOL INTERNS

Is there a limit to the number of interns a supervisor can mentor?

No, the supervisor can determine the appropriate number of interns that is reasonable to supervise. Please keep in mind that if a supervisor hires multiple high school interns, they may be from different schools. Each school has varying procedures with high school interns. There may be differences between: start/end dates, working hours, requests for additional student evaluations, requests for modifications to the <u>Training Plan</u>, etc. Supervisors should also determine if they will have adequate time to supervise multiple interns. Also, this will be the first true work environment for most high school students. They will need time and guidance from the supervisor as they learn and become comfortable in their work/internship environment.

TELEWORK

Can high school interns telework?

It is recommended high school interns be on site to understand workplace operations, as this is often their first time in a professional work environment. If it is believed that telework can represent a portion of the weekly schedule, consult with your HR Liaison. Agencies may have specific telework procedures in place or may need to review with the legal office.

UNION ITEMS

Do we need to have any conversations with the relevant unions if the interns will be used to perform bargaining unit work?

The High School Internship program is used to provide students with an understanding of the workplace and the type of work to be performed. High school interns can and should perform basic level duties, deemed appropriate, to gain a better understanding of the applicable commonwealth career(s). But, high school interns should <u>not</u> be used to take the place of bargaining unit employees or be considered part-time employees. Use the <u>Training Plan</u> to develop learning opportunities students can observe, assist with, and/or perform to better understand the position. The goal of the program is to create interest among interns who are near graduation to apply to full-time, part-time, or seasonal vacancies (or to postsecondary internships if they are pursuing further education/training). Discuss with your HR Liaison if you believe it is beneficial to inform the union that the organization will be using High School Interns.