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MEMORANDUM FOR HEADS OF EXECUTIVE DEPARTMENTS AND AGENCIES

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Subject: Guidance on Promoting Internships and other Student and Early Career Programs in the Federal Government

The U.S. Office of Personnel Management (OPM) and the Office of Management and Budget (OMB) are releasing guidance on increasing opportunities for internships, fellowships, apprenticeships, and other student and early career programs in the Federal Government, including paid internship programs. This guidance advances the goals of the “Strengthening and Empowering the Federal Workforce” priority in the President’s Management Agenda (PMA) and is issued pursuant to Executive Order 14035, Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce (the DEIA Executive Order). Agencies are encouraged to expand their overall number of interns while increasing the number of paid interns and reducing reliance on unpaid interns, consistent with applicable laws.

The Federal Government offers unparalleled opportunities for dedicated, mission-driven people who want to make a positive impact in service to their country, both here and around the world. As the largest employer in the country, we aspire to be a model employer, and agencies can help achieve that goal by having a talent pipeline that begins with exceptional internship programs. The Biden-Harris Administration has committed to building a Federal Government that reflects the diversity of the American people, believing that qualified people from every background and walk of life should have equal opportunity to serve our Nation.

In the President’s FY 2023 Budget, agencies committed to hiring over 35,000 interns in the coming year. Pathways Programs - the primary vehicle for bringing interns into the Federal Government - has opportunities for paid internships available to students right now on usajobs.gov, with plans to improve aspects of the program in a forthcoming Notice for Proposed Rulemaking (NPRM). This guidance – alongside these other efforts - will help individuals early in their career have access to these opportunities.

Agencies should:

1. Increase the number of interns, fellows, apprentices, and early career hires across the Federal Government, with an emphasis on increasing paid internship opportunities and decreasing reliance on unpaid internships.

2. Better coordinate and fund strategic Federal internship, fellowship, and early career hiring programs.
3. Focus on the strategic development and implementation of Federal internship, fellowship, and early career hiring programs – while holding senior leaders accountable to using these programs to build an inclusive and diverse Federal workforce talent pipeline.

Internships as an Equitable Path to Service

As stated in the President’s Management Agenda (PMA), being a model employer includes having a workforce – at every level – that draws from all segments of American society and evolves agency workplaces and work practices to reflect the needs of the Federal workforce today and in the future. Senior Federal leaders are investing in recruiting, developing, and retaining early career talent – which includes interns, fellows, and apprentices – to achieve agency missions and to support this vision. Agencies are also identifying challenges to hiring those who are in the early stages of their careers, exploring options to increase the number of opportunities for this group, and ensuring they are included in strategic workforce planning efforts. This guidance directs the leadership commitment required to change Federal agency practices, so more paid internship opportunities are provided across the Government.

Internships are a critical pathway to Federal service. Internships allow individuals who are working on a four-year degree, learning a trade, studying at a community college, or participating in other qualifying programs to gain valuable work experience and see what it is like to work for the Federal Government and contribute to important missions. Whether entering the workforce for the first time or changing professions, internships are mutually beneficial: they offer interns a chance to demonstrate their existing talents and potential, while offering agencies time to evaluate their skills and abilities, as they receive the benefits of contributions the intern makes to their teams.

For many, an internship that does not offer any form of compensation (e.g., housing stipends, recruitment incentives, or financial arrangements with third-party organizations) is the illusion of opportunity, further complicated by the practical needs of having a paying job while not enrolled in traditional coursework.

The Biden-Harris Administration is taking on the inequity of unpaid internships in several ways. First, the White House has served as a model for other agencies by eliminating all unpaid internships for the first time in the history of their internship program. Second, the DEIA Executive Order directs OPM and OMB to issue guidance to agencies to “increase the availability of paid internships, fellowships and apprenticeships, and reduce the practice of hiring interns, fellows and apprentices who are unpaid.” This memorandum provides that guidance to agencies. Third, as part of the Fiscal Year 2023 budget, agencies specifically committed to advancing opportunities for paid interns and provided intern hiring projections. The number of interns in the Federal Government has decreased significantly over the past 10 years. One of the most impactful ways to rebuild the Federal Government’s lagging early career talent pipeline is to revive Federal internship programs. This guidance supports this goal.

Internships and similar programs offer a way to bring in different perspectives and create a stream of talented and diverse employees with new skill sets. These programs also provide opportunities for non-supervisory employees to gain experience, training, and mentoring new staff, as well as opportunities for students to mentor seasoned staff through reverse mentoring. For students, these professional experiences must be engaging and provide meaningful work; and paid opportunities provide students from all segments of society and socioeconomic backgrounds an opportunity for Federal service.

Agencies should increase the use of student employment programs and other hiring authorities, to help open paths to employment and opportunities for all. Moreover, agencies should consider compensation practices that are fair and provide equal opportunity. This may come in the form of hourly compensation from the agency itself, or arrangements involving other forms of compensation, including, for example, stipends, recruitment incentives, travel benefits, and financial arrangements with third-party organizations.

In one type of internship, interns work in order to obtain academic credit and also are prohibited from receiving pay by their academic institutions. The Administration is interested in further exploring these arrangements to assess how to best meet the policy objective of increasing paid internships while decreasing reliance on unpaid internships, without disrupting the students' ability to satisfy their academic requirements.

Goals for Recruiting, Hiring, and Retaining Early Career Talent

The Biden-Harris Administration is committed to a renewed focus on the Federal Government's efforts to recruit, hire, and retain early career talent. We simply need to do a better job of attracting and hiring people who are early in their Federal careers. They bring constructive and beneficial skills and experiences that improve the Federal workforce. The goals for recruiting, hiring, and retaining early career talent include:

- Increasing the availability of paid internships, fellowships, and apprenticeships.
- Enhancing hiring assessment processes to improve hiring outcomes.
- Increasing activities to recruit early career talent to meet agencies' needs, to build a talent pipeline and address longstanding skills gaps.
- Improving outreach to individuals from underserved communities so the Federal workforce draws on the richness and diversity of our country.
- Reinvigorating the Pathways Programs by updating the regulations to help agencies better recruit and retain early career talent.

In advancing these goals, agencies are reminded that, other than a few agency-specific statutes, agencies are generally not subject to caps on the number of full-time equivalents (FTEs) they may hire. Agencies are expected to meet the hiring projections they set for paid internships and student volunteer programs. At the same time, intern hiring is expected to be a supplement to, not a replacement for, competitive hiring.

Definitions

For this guidance, “internships,” “fellowships,” and “registered apprenticeships” are defined as follows:

An **internship** is an experiential learning opportunity within a defined time period for an individual who is accepted for enrollment or is enrolled in and seeking a degree (e.g., diploma, certificate) in an accredited educational institution, on a full- or part-time basis (as defined by the educational institution in which the student is enrolled). This includes high schools, technical and vocational schools, 2- and 4-year colleges and universities, graduate and professional schools, certificate programs, and distance learning programs. Internship experiences may or may not be tied to academic credit and may or may not be a required experiential learning component of an academic program. “Internship” includes, but is not limited to, Pathways internships.

A **fellowship** is a professional development experience within a defined time period for individuals who possess several years of full-time work experience or for students further along in their academic studies. While not a requirement for all fellowships, some fellows have been accepted for enrollment or are enrolled in and seeking a graduate degree on a full- or part-time basis in the types of accredited educational institutions mentioned above. For those who are not current students, fellowships often provide the individual with experience and further training for a particular career path or field; fellows who undertake a brief “tour of duty” to support agencies on particular projects or programs can also bring their subject-matter expertise into agencies. “Fellowship” includes Pathways Programs Fellowships (the Presidential Management Fellowship) and other formal Federal Fellowship programs, but is not limited to opportunities offered through these programs.

Registered apprenticeships are industry-driven, high-quality career pathways where employers can develop and prepare their future workforces, and apprentices can obtain paid work experience, classroom instruction, and a portable, nationally recognized credential that will enable them to immediately enter a specific occupation.

Agency Actions to Promote Paid Internships, Fellowships, and Apprenticeships

There are many authorities and programs that Federal agencies can use to recruit, hire, and pay interns, fellows, and apprentices. The attached Guide to Federal Internships, Fellowships, and Apprenticeships (“Guide”) contains useful information on these programs. We encourage agencies to review the Guide in connection with developing their strategic workforce plans.

Agencies also should review and implement the following actions and management interventions to promote paid internships; support and develop the future Federal workforce; improve outreach and recruiting strategies for a more diverse workforce; and meet the needs of applicants with disabilities.

Management Interventions to Promote Paid Internships

Agencies should work with senior leaders, hiring officials, budget officers, diversity, equity, inclusion, and accessibility (DEIA) practitioners, human resources officers, and other stakeholders to:

1. Strengthen workforce planning efforts for the long term by incorporating strategic use of internships, fellowships, and apprenticeships as part of the agency's succession planning, talent management, skills, and competency gap assessments, especially in filling mission-critical jobs.
 - a. Identify how specific workforce needs could best be met by hiring interns, fellows, or apprentices.
 - b. Identify barriers and challenges to hiring interns, fellows, and apprentices and propose options to increase these opportunities in the short and long term.
 - c. Work with internal components and bureaus to address their specific recruitment and hiring challenges and to increase paid opportunities available to students and recent graduates, as part of an overall workforce strategy. Examine use of student volunteer programs to ensure such opportunities are available to a broad and diverse group of applicants and explore ways to hire paid interns rather than to default to student volunteers. While these programs provide students with valuable learning experiences to introduce them to Federal agencies and their missions, educational opportunities, and mentoring, the unpaid nature may serve as a barrier for underserved populations, particularly applicants from families with limited resources. Accordingly, student volunteer programs may be used strategically as part of a comprehensive recruitment strategy that includes paid opportunities through the Pathways Programs,¹ Workforce Recruitment Program,² Scholarship for Service,³ third-party internship programs, hiring authority for post-secondary students,⁴ hiring authority for college graduates,⁵ fellowships, apprenticeships, and other programs. Additional steps should be taken to reduce the need for unpaid opportunities over time. Refer to the attached Guide for specific information about applicable paths to Federal employment.
 - d. Identify and expand the use of internships with potential for remote work to broaden applicant pool.
2. Ensure adequate staff and resources are allocated to promote, utilize, and administer these programs. This should include adequate in-kind support to the interns, fellows, and apprentices in the form of mentorship, the fostering of inclusion and belonging, and appropriate onboarding and training for access to formal and informal processes and routines.

¹ <https://www.opm.gov/policy-data-oversight/hiring-information/students-recent-graduates/>

² <https://www.wrp.gov/wrp>

³ <https://sfs.opm.gov/>

⁴ <https://www.federalregister.gov/documents/2021/08/18/2021-17638/hiring-authority-for-post-secondary-students>

⁵ <https://www.federalregister.gov/documents/2021/11/05/2021-23871/hiring-authority-for-college-graduates>

3. Raise awareness among human resources professionals and hiring managers of sources and methods for onboarding diverse, equitable, inclusive, and accessible talent pools, including for interns, fellows, and apprentices. Where beneficial, agencies or components should consider sharing responsibilities around the recruitment and hiring of interns (while still providing flexibility for agencies, individual candidates, and hiring managers), to help facilitate better access to diverse candidate pools as well as a sense of camaraderie and inclusion amongst internship cohorts.
4. Update the agency's supervisory training curriculum to address the long-term value proposition and business case for hiring interns, fellows, apprentices, and early Federal career employees.
5. Establish an agency-wide mechanism to place interns eligible for conversion into permanent positions within the agency, and across agency and component organizational lines, when possible, under current law. OPM and OMB will also explore opportunities for supporting placement of interns into permanent positions across departments and agencies.
6. Provide data annually on the number of paid and volunteer interns, fellows, and apprentices employed to better inform the current state of these opportunities in the Federal Government. It is also suggested that qualitative data (i.e., exit surveys) be collected on the perceptions of the interns, fellows, and apprentices. Instructions will be provided to agencies on submitting this data to OMB and OPM via a data collection page on MAX.

Supporting and Developing the Future Federal Workforce

Interns, fellows, and apprentices are usually new to an occupational field, and sometimes new to the Federal workforce – or the workforce in general. Incorporating a formal development structure or clearly providing development and training opportunities can facilitate an individual's knowledge of the work and the organization, which helps set them up for success. Agencies should also consider how these developmental and training opportunities can support the entire workforce and are encouraged to be more inclusive in making these programs available. OPM will support agencies by providing technical assistance via webinars and other resources on leading practices in this area.

Improving Outreach and Recruitment Strategies for a More Diverse Workforce

The Federal Government is well-positioned to lead by example and demonstrate DEIA values in its practices when attracting, recruiting, and hiring into the workforce. The DEIA Executive Order provides a broad and expansive definition of diversity that ensures Federal agencies tap into every corner of this country for talent. Using the DEIA EO as a reference, agencies should expand outreach to include untapped early career talent pools, including underserved communities, for internship, fellowship, and apprentice programs. OPM will offer technical assistance to agencies and share effective recruiting strategies. Refer to the accompanying Guide for details.

Meeting the Needs of Applicants with Disabilities

Agencies are reminded to ensure that all interns, fellows, and apprentices with disabilities, including applicants and candidates, can access information in accordance with Section 508 of the Rehabilitation Act of 1973, 29 U.S.C. 791, et seq., and can access information about a process for requesting and obtaining reasonable accommodations to support their work in the Federal Government, which incorporates the Americans with Disabilities Act of 1990, as amended, 42 U.S.C. 12201-12204 and 12210 (as such sections relate to employment). Consult with your agency Disability Employment Program Office or Equal Employment Opportunity Office for additional information.

Conclusion

OPM has been working with agencies to recruit and hire a diverse and talented workforce drawn from across America and to address new and evolving hiring needs. Our collaborative efforts to implement this guidance will help to reinvigorate Federal early career talent programs that serve as a pipeline for diverse talent into Federal jobs by investing resources in these programs, increasing public visibility of Federal careers, and establishing and maintaining effective partnerships with colleges and universities. Continued partnership among OPM, OMB, agencies, employees, and their unions has the potential to strengthen the Federal hiring process and assist agencies in employing the tools at their disposal, including as it relates to recruiting and retaining early career talent.

OPM and OMB will continue to develop and provide tools and resources to support agencies in meeting the goals outlined above. OPM will provide technical assistance and resources, as well as host learning events for stakeholders, including human resources practitioners, DEIA practitioners, agency recruiters, and talent teams. Agencies should evaluate the impact of these new efforts to increase the employment of students and early career talent agency-wide, and OPM and OMB will assess Government-wide progress.

We look forward to working with agencies to implement the actions outlined in this guidance and to strengthen the pipeline for Federal talent. If there are any questions about this guidance or a need for technical assistance on any of the action items, agency headquarters-level human resources offices may contact OPM at Recruitment@opm.gov. Component-level human resources offices should contact their agency headquarters for assistance. Employees should contact their agency human resources offices for further information on this memorandum.

Attachment: Guide to Federal Internships, Fellowships, and Apprenticeships (508-conformant pdf)

cc: Chief Human Capital Officers (CHCOs), Deputy CHCOs, Human Resources Directors, Chief Diversity Officers, Chief Learning Officers, Small Agency Council