



UNITED STATES OFFICE OF PERSONNEL MANAGEMENT

Washington, DC 20415

The Director

Friday, October 19, 2012

MEMORANDUM FOR: Chief Human Capital Officers

FROM: John Berry, Director

Subject: Use of Third-Party Intern Providers

In November 2011, OPM issued the Government-wide Diversity and Inclusion Strategic Plan. See <https://www.opm.gov/policy-data-oversight/diversity-equity-inclusion-and-accessibility/reports/diagency-specific-strategic-planning-guidance.pdf>. Priority 1.1 of that plan states that agencies are to "design and perform strategic outreach and recruitment to reach all segments of society." Among the actions listed under that priority is the requirement that agencies "review and ensure that student internship and fellowship programs have diverse pipelines to draw candidates from all segments of society."

One way to begin addressing this priority is for agencies to use third-party intern providers as part of an overall intern recruiting strategy. Over the years, many agencies, including OPM, have developed beneficial relationships with third-party intern providers. These providers can serve as a good source of diverse, qualified, and motivated students who are interested in internship opportunities at Federal agencies.

Since OPM's final regulations implementing the Pathways Programs became effective on July 10, 2012, we have received some questions from agencies about the role of third-party intern providers under Pathways. Agencies should be aware that nothing in Executive Order 13562 (which created the Pathways programs), or in the regulations implementing Pathways, restricts in any way an agency's authority to enter into arrangements with third-party intern providers. Agencies retain the same authority to enter these arrangements that they had before the Pathways programs were authorized.

In addition, third-party provided interns have the same type of path to a permanent Federal job as they had previously. Thus, as they previously could under the Student Career Experience Program, agencies continue to have the ability to hire third-party provided interns into the agency Internship program, so long as they follow the regulatory requirements for filling Internship positions (which now include a public notification requirement). Once in the agency's Internship program, the student could then convert to a permanent Federal job upon graduation and completion of 640 hours of work. In that circumstance, the agency could count up to 320 of the hours that the intern worked as a third-party provided intern toward the 640-hour requirement for conversion.

There is also a new path to a Federal job under the Recent Graduates program. Third-party provided interns who graduate are now eligible to be hired into any agency's Recent Graduates

program, so long as the agency follows the regulatory requirements for filling Recent Graduate positions.

Because agencies are required to post information about Internship and Recent Graduate program opportunities on USAJOBS.gov, there is now more transparency about which agencies are hiring Interns and Recent Grads. Agencies should make third-party provided interns aware of this new feature of Pathways.

We also want to highlight that in Executive Order 13562, the President encouraged agencies to allow third-party provided interns to participate in their Internship programs to the same extent as the interns the agency hires itself. That means that third-party provided interns should get the same access to training, career development, and mentoring as other agency interns.

Finally, I have asked the Pathways Advisory Council (which consists of Pathways Program Officers, as well as interns and recent graduates from across government) to identify ways to streamline the process for third-party provided interns to apply for opportunities in agency Internship and Recent Graduate programs and to reduce other barriers to agency use of third-party providers. We will issue further guidance on this topic when the Council's work is complete.

Please direct any questions about this guidance to OPM's Student Programs Office. We can be contacted at 202-606-1040 or pathways@opm.gov.