To the Mayor and Members of the City Council

February 3, 2026

SUBJECT: COLLEGIATE AND VOCATIONAL STUDENT INTERNSHIP PLACEMENT

This Informal Report is to establish and provide the framework and funding mechanisms for uniform standards and procedures for the recruitment, placement, supervision, and administration of collegiate and vocational Students with the City of Fort Worth through internships, practicums, apprenticeships, or similar programs.

Purpose

In support of Student placements, a citywide Administrative Regulation (AR) is effective immediately and has been developed to ensure consistency in this area, which is intended for all City departments and offices that host, supervise, or fund collegiate or vocational Student placements, whether paid or unpaid, whether on-site, remote, or hybrid, and whether part-time or full-time.

Funding Considerations for Student Placement

Through the annual budget process, funding will be allocated through the City Manager's Office, in support of the placement of one (1) paid Student for each Mayoral and City Council District. Funding will represent a maximum of 240 hours per District.

Departmental paid Student placement opportunities may be funded, within their respective budget, through the annual budget process.

Additional Guidelines

In summary, the AR establishes compliance with applicable regulations, including but not limited to the Department of Labor (Fair Labor Standards Act), U.S. Citizenship & Immigration Service (Employment Eligibility Verification), and Internal Revenue Service (tax withholding), to allow the City to host paid and unpaid Students in placements that further educational objectives and operational needs. All placements must have a valid educational purpose, defined scope of duties, and appropriate supervision, consistent with the AR and City's Personnel Rules and Regulations.

Procedure for Student Placement

Department Hiring Manager shall contact the Human Resources Talent Acquisition team to initiate the request to recruit for a Student placement opportunity. The HR Department will guide the selection, screening and placement process.

Procedure for Employing Paid Students

Paid Students are temporary employees and must be processed through Human Resources and payroll systems. Hiring ranges and guidance on initial compensation can be obtained from Human Resources and will align with adopted pay schedules.

Procedure for Employing Unpaid Students

In some cases, Students may be prevented from accepting compensation by their educational

institution or may have a personal desire to gain work experience, regardless of funding availability. Unpaid placements must be primarily for the Student's educational benefit and structured to align with objectives in this area.

- The City may not use unpaid Students to displace regular employees or to perform work that is solely for the City's immediate operational advantage.
- Unpaid placements must include documented criteria for learning framework, periodic progress checks, and agreed outcomes.
- The majority of assigned duties should be directly related to the Student's area(s) of study.
- Both the department and Student(s) must provide written acknowledgement of placement criteria, in conjunction with Human Resources. In addition, Student(s) must attest to their understanding that the placement will be without compensation.

Other Considerations

- Placement
  - Student placements may be continuous or intermittent and may be recurring for up to one (1) year, if the Student meets defined educational program requirements.
  - Departments are encouraged to support competitive selection for both paid and unpaid Student placements.
  - Schools may require execution of a formal agreement outlining the responsibilities and expectations of Students and their supervisors during placement; however, no agreement shall be executed guaranteeing placement or otherwise reducing the City's ability to make employment decisions on an at-will basis.
  - The City will not enter into agreements requiring Student sponsorship, formal program oversight (ex. Optional Practical Training (OPT), Curricular Practical Training (CPT), or other similar sponsorship or oversight criteria not defined by this policy. All agreements should be routed to Human Resources for review prior to execution.

- Work Schedules
  - Students may work a maximum of 19 hours per week.
  - As much as possible, work hours should be flexible to accommodate the Student's scheduled coursework.

Exclusions

- Proposed guidelines do not apply to regular City employees enrolled in academic programs outside of work who are not serving in a student placement capacity or Students acting in a volunteer capacity, as defined by the Volunteers & Volunteer Programs AR.

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Questions or information requests should be directed to Kristen Smith, Director of Human Resources, at Kristen.Smith@FortWorthTexas.gov or 817-392-2697.

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