



CIEE: Next Generation Career Pathways

# Understanding Employer Friction

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## Understanding Employer Friction

The NGCP Promise includes learners gaining real work experience—which depends on employers being willing and able to participate at meaningful scale. In December, the Subcommittee explicitly pushed to broaden “employer liability” into a wider employer participation friction problem. That is: even when employers *want* to help, they often hit barriers—some are real compliance constraints, many are operational friction points, and some are simply unclear or inconsistent guidance. This brief is a short, practical analysis of common barriers (liability, supervision, transportation, scheduling, incentives, points of contact) and promising policy or practice moves. This work directly supports our commitment to explore employer participation options and incentives—with NCEE framing option pathways and constraints, the Subcommittee coordinating a coalition and developing legislative recommendations, and owners scoping guidance and sectors for action.

### **This brief covers:**

- Perceived risk / unclear rules (where clarity solves the problem)
- Real constraints (where policy, insurance, or program design may be required)
- Operational friction (forms, approvals, points of contact, supervision, schedules, transportation)

### **This brief is:**

- Not legal advice.
- Not a full statutory proposal.
- Not a complete employer engagement strategy for every sector.
- Not a mandate on districts or businesses.

### **Questions to Consider as You Read:**

- If we want “yes” to be the default for employer partnership, what would need to be simpler, clearer, or more predictable? (From an employer’s point of view)
- Where do we already have real momentum in Nevada that we should build on—rather than starting from scratch? (What’s already working well enough to scale, strengthen, or connect?)
- What could “meaningful progress” look like in the next 6-18 months? (A small set of visible outcomes that would give you confidence we’re moving from roadmap → roadwork.)

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## I. What's Working Now: Nevada Bright Spots

Employers are more likely to say yes when the ask is clear and the support is reliable. Nevada already has several building blocks that make work-based learning placements easier to start and easier to repeat. This section highlights a few of those bright spots and describes the features that reduce confusion for employer hosts.

### **A statewide work-based learning playbook that clarifies expectations for employers and schools:**

Nevada's Department of Education (NDE) has built a [clear statewide administrative framework](#) for work-based learning (WBL) that spells out what "counts" as WBL across grade bands (career exploration → preparation → training) and provides districts/charters with shared tools (e.g., employer host vetting resources) to structure experiences consistently. [The state's WBL guide](#) goes further into implementation details that matter to employers, including roles and responsibilities (e.g., teacher of record, district WBL coordinator models), expectations for student safety and supervision, and clear guidance on liability/insurance and workers' compensation for paid placements. Nevada law also authorizes approved districts/charters to purchase liability insurance for student participation in WBL—an important "risk clarity" lever that can reduce hesitation among employer hosts.

#### **Why it works:**

- Reduces ambiguity by providing a common statewide definition, continuum, and program expectations.
- Lower transaction costs with guidance + tools districts can use to onboard and vet work sites.
- Addresses liability confusion directly (insurance/coverage expectations and options), which is a common "first barrier" for employer participation.

### **NevadaWorks' statewide apprenticeship support that can "take the paperwork off employers' plates":**

NevadaWorks leads a [statewide apprenticeship expansion effort](#) (funded through the U.S. Department of Labor) aimed at helping employers build and sustain apprenticeship programs in in-demand industries. The program explicitly offers optional program sponsorship—support that can handle paperwork, tracking, and reporting so employers can focus on training. NevadaWorks also provides technical guidance on registering apprenticeships, connections to education/workforce partners, recruitment support, ongoing technical assistance, and financial help to offset startup and training costs.

**Why it works:**

- “Back office” sponsorship reduces compliance and administrative burden—especially for small and mid-sized employers.
- Financial + technical assistance lowers the risk of “first-time” participation.
- Intermediary connectivity links employers to education/workforce partners (reducing the “who do I call?” barrier).

**A regional “Earn & Learn” front door that brokers paid work experiences for young people:**

In Southern Nevada, the EmployNV Youth Hub positions [“Earn & Learn”](#) as a structured on-ramp that places young people (ages 16–24) into paid work experiences, internships, and on-the-job training opportunities through local employer partnerships. The same hub also offers job shadowing, pre-apprenticeship, and employability skill-building among its work-based learning activities—suggesting an integrated pathway approach rather than a one-off placement model.

**Why it works:**

- Intermediary function reduces employer burden for recruiting, screening, and early-stage coaching.
- Paid placements create a clearer ROI and often improve consistency/attendance versus purely unpaid models.
- Wraparound supports (e.g., counseling/supportive services listed by the hub) help stabilize participation for youth and employers.

**A regional workforce intermediary that can braid funding and reduce employer risk:**

In Southern Nevada, Workforce Connections [convenes employers by sector](#) and can combine restricted federal dollars with flexible state funds to close practical gaps (e.g., subsidizing work experiences, filling eligibility gaps, supporting wraparound needs).

**Why it works:**

- Employers get a consistent “community connector” who can translate needs into actionable partnerships (instead of one-off outreach).
- Braided funds reduce first-time risk and make participation feel rational for small employers.
- Sector convenings make it easier to match employers to specific programs and instructors (reducing mismatch and churn).

**A district-built employer onboarding kit for internships, paired with a broader strategy to expand CTE access:** Washoe County School District (WCSD) is moving from a “Signature Academies” model to a “[CTE for All](#)” approach intended to make more CTE programs accessible across comprehensive high schools (while continuing applications for two dedicated career academies). On the work-based learning side, WCSD has created a clear employer-host onboarding pathway: a “start the process” form link and a standardized set of required internship documents (district work-based learning agreement, training agreement, evaluation form, learning plan, tracking log, and background check verification). This is the kind of concrete packaging that can make participation feel doable for employers who otherwise stall out due to paperwork uncertainty.

**Why it works:**

- One entry point + standardized documents reduce the “paperwork cliff” for employers.
- Clear expectations for learning plans and evaluation reduce ambiguity about supervision and outcomes.
- Access strategy (“CTE for All”) signals that WBL is not boutique—it’s being treated as a scalable district offering.

## II. Where Employers Experience Friction

Once an employer agrees in principle, the details often determine whether a placement actually happens. This section maps the common points where employers get stuck, even when they want to participate and even when a school partner is supportive. The categories below reflect what employers experience as friction in real time, from risk questions to the practical constraints of supervision and scheduling.

### Liability and Risk

“Liability” is often used as a catch-all, but employers’ hesitation typically bundles several distinct risk questions: (1) who is responsible if a student is injured (on the way to the site, on site, or while performing tasks); (2) whether the employer’s existing general liability / workers’ compensation / auto coverage applies cleanly to minors in short-term placements; and (3) reputational or HR risk (harassment, inappropriate supervision, confidentiality breaches, or misunderstandings that escalate quickly). Even when employers want to help, uncertainty about these specific risk lanes tends to push them toward a conservative default: “18+ only,” or “we’ll host a tour, but not a placement.”

A second layer is the perceived risk of non-compliance—not only with youth labor rules, but also with sector-specific requirements (e.g., patient privacy norms, safety rules, licensure expectations, or internal corporate policies). Employers often do not distinguish between “legally prohibited” and “administratively messy,” and so they treat the whole thing as high-risk. In practice, that means even relatively low-risk experiences can be avoided because employers lack confidence that they understand the boundaries, or they fear that one misstep will create disproportionate consequences.

### **Supervision and Training Burden**

For many employers—especially small and mid-sized businesses—the binding constraint is not willingness but human capital bandwidth. A placement that looks small on paper can require real time from a supervisor: onboarding, safety orientation, day-to-day check-ins, documentation, and the attention needed to ensure the student is doing meaningful work rather than simply “shadowing.” Employers often experience this as an immediate operational cost with uncertain payoff, particularly when the placement is short, intermittent, or not well-aligned to a real workflow need.

This burden can also increase for youth placements because “student-appropriate” tasks may be narrower than a typical entry-level role, which pushes employers into more intentional job carving and closer oversight. Even when employers believe the long-term value is there (future talent pipeline, stronger community relationships), the near-term reality is that someone must be responsible for supervision, and many businesses report that they simply do not have slack capacity to do it consistently. In some sectors, supervision is a structural bottleneck. Where training models require close supervision (e.g., apprenticeship ratios, clinical supervision, safety-critical environments), the number of available mentors/trainer-level staff caps how many youth placements can exist at once. Scaling WBL in these sectors may require explicit “train-the-trainer” strategies and incentives or rule changes to build durable pathways at scale.

### **Transportation**

Transportation barriers show up differently across Nevada contexts, but they almost always surface as a practical constraint on scale. In rural areas, the issue is often distance—long travel times to worksites, limited transit infrastructure, and the high cost (time and dollars) of moving students safely. Even in urban/suburban settings, transportation becomes a friction point when students lack reliable access to a car, cannot drive, or depend on adult schedules that do not align to placement times.

Transportation is also entangled with liability and scheduling. If a student must travel during the school day, questions arise about who is responsible for supervision in transit, whether the district can transport, whether the employer can transport, and what happens when transportation fails (missed hours, inconsistent attendance, or the placement being perceived as unreliable). The more complex the transportation plan, the harder it is for employers—especially those without dedicated HR staff—to keep saying yes.

### **Scheduling and Seat-Time Conflicts**

Traditional bell schedules and course sequencing create a structural mismatch with work-based learning. Many employer worksites operate on blocks of time that do not fit neatly into a 50-minute period, and meaningful participation often requires contiguous hours. When experiences occur during the school day, schools must manage attendance, supervision transitions, instructional time, and credit implications—all while keeping the rest of the student schedule intact (core courses, CTE coursework, athletics, dual credit, etc.). Even when policies exist that allow work-based learning to “count,” the operational reality can still be difficult.

This friction is amplified by the fact that many high-value opportunities are not designed around school calendars. Employers may offer experiences during business peaks, seasonal cycles, or standard weekday hours. Schools, meanwhile, have to manage graduation requirements and course completion expectations. The result is a pattern where opportunities that *could* exist at scale remain “pocketed” because only certain students (with flexible schedules, transportation, and supportive staffing) can realistically participate.

### **Incentives and ROI**

Employers’ ROI calculation is often more nuanced than “pay students or not.” It includes the full cost of participation: supervisor time, onboarding, compliance checks, workflow disruptions, and the risk that the student will not return as an employee. Employers frequently report that even when the long-term payoff is plausible, the near-term overhead can feel too high—particularly for smaller firms that cannot spread the costs across many placements or dedicate staff to partnership management.

ROI also varies by sector and by the clarity of the talent pipeline. Where an employer sees a clear connection between student preparation (skills, credentials, readiness behaviors) and a near-term hiring pathway, participation is easier to justify. Where the pathway is diffuse—uncertain job roles, unclear skill signals, or a mismatch between student readiness and business needs—employers may

view participation as primarily philanthropic rather than strategic. That makes the partnership more fragile in tight labor markets or during periods of operational stress.

For small employers, ROI is also a capacity problem. Many small firms don't have dedicated HR staff, standardized onboarding, or bandwidth to design "student-appropriate" roles. Given this, reducing employer friction may require a spectrum of employer supports (e.g. hosted onboarding templates, mentor micro-training, wage subsidies/on-the-job training reimbursement) so that participation doesn't depend on one overstretched manager.

### **Points of Contact / Coordination Failure**

Even motivated employers can get stuck at the "front door." A common failure mode is that employers do not know who to call: district office vs. individual school, CTE leadership vs. counseling vs. work-based learning coordination, or a magnet/academy contact vs. a comprehensive high school contact. If an employer reaches the wrong person, they may receive incomplete, overly conservative, or inconsistent guidance—and conclude that the district (or schools in general) is "too hard to work with."

Coordination breakdowns also happen internally. District policies, school-level practices, and partner expectations can drift out of sync, especially when staffing changes or when responsibilities are distributed across multiple departments. The employer experience becomes one of inconsistency: a "yes" from one site, a "no" from another, and no clear explanation of what is actually required. Over time, this inconsistency functions like a deterrent: employers stop trying, not because they oppose the work, but because the navigation cost feels unreasonable.

Employer-side turnover is also a fragility point. Many partnerships rely on one hiring manager or outreach lead. When that person leaves, the "institutional memory" disappears and the employer drops out. This often results when relationships are not embedded in a repeatable or more broadly supported process.

### **Youth Labor Rule Confusion**

Confusion about youth labor rules shows up both as genuine uncertainty and as risk-avoidance behavior. Employers often overestimate what is prohibited, especially for 16–17-year-olds. Under federal rules for non-agricultural employment, 16–17-year-olds can generally work unlimited hours, but they cannot perform tasks covered by the Hazardous Occupations Orders (and employers must still comply with any stricter state rules). In practice, many employers compress this into a simplified rule—"minors can't do much"—and opt out rather than sorting out what is actually allowed.

For 14–15-year-olds, the rules are materially more restrictive (hours limits, time-of-day limits, and narrower permitted occupations). That reality can spill over into employer perceptions about all minors, creating blanket prohibitions even when older students could legally and safely participate. Confusion is also compounded by the difference between “job allowed” and “task allowed”: an employer may be able to host a student in a sector, but certain equipment, environments, or duties may be off-limits for under-18 workers—requiring thoughtful role design and supervision.

Finally, youth labor rules are only one layer. Employers also contend with company policy, insurance requirements, and sector-specific regulations that can be stricter than the baseline federal standard. Because employers often receive fragmented guidance (or hear anecdotes from peers), they may treat uncertainty as a sign that the safest route is non-participation. The result is a gap between the opportunities that are legally possible and those that are operationally “thinkable” for employers without clear, trusted interpretation.

### **III. Overview of Federal and State Youth Labor Constraints**

Youth participation in paid internships, pre-apprenticeships, job shadows, and other work-based learning (WBL) experiences is governed by a layered legal framework. Federal child labor law sets a baseline for minimum ages, hours, and prohibited tasks; states may add stricter limits. Frequently, uncertainty about where these boundaries sit (especially around “hazardous” work and school-week scheduling) often leads employers to narrow placements to low-risk duties or default to “18+ only,” even when legal pathways exist for youth participation.

Many federal “child labor” restrictions apply only when there is an employment relationship (e.g., the student is employed by the business or otherwise meets the definition of an employee). School-based instruction and simulated work can look like “work,” but may not be “employment” under the federal framework. When a placement is structured as employment, however, the federal rules apply fully, including Hazardous Occupations Orders (HOs) and—depending on age—hour/time limits.

#### **Federal youth labor constraints (FLSA; non-agricultural employment)**

##### **Age bands and the basic federal structure**

Federal youth employment rules under the Fair Labor Standards Act (FLSA) operate on three key thresholds:

- Under 14: generally may not be employed in non-agricultural work covered by the FLSA (with narrow exceptions such as newspaper delivery, acting, and casual babysitting).

- Ages 14–15: may work outside school hours only, for limited hours, in a narrow set of permitted occupations; “what is not permitted is prohibited.”
- Ages 16–17: may work unlimited hours, but may not work in any occupation declared hazardous for minors (the Hazardous Occupations Orders).
- 18+: no longer subject to federal youth employment restrictions.

Federal law does not require “working papers” or work permits (though many states do), and it generally does not restrict hours for workers 16+ (though states sometimes do). Federal youth rules also don’t apply when there is no FLSA employment relationship—which is one reason the legal treatment of different WBL models can vary.

### **Hazardous Occupations Orders (HOs): the main “task-level” constraint**

For minors under 18 in non-agricultural employment, there are currently 17 Hazardous Occupations Orders that prohibit work which the U.S. Department of Labor has determined is particularly hazardous or detrimental to youth. These HOs are a central constraint for high-school WBL because they are often equipment- and task-based, not just “industry-based.” That means a youth can run into an HO restriction in settings that otherwise feel low-risk (e.g., a deli meat slicer in a grocery store; a compactor behind a retail store; a forklift in a warehouse; roof-adjacent tasks on a construction site). The 17 non-ag HOs (high-level) are:

- HO 1: explosives (manufacturing/storage)
- HO 2: driving motor vehicles / “outside helper” work on vehicles
- HO 3: coal mining
- HO 4: logging/forestry/sawmilling and certain forest fire work
- HO 5: power-driven woodworking machines\*
- HO 6: radioactive substances/ionizing radiation
- HO 7: power-driven hoisting apparatus (e.g., many forklifts and lifts)
- HO 8: power-driven metal forming/punching/shearing\*
- HO 9: mining (other than coal)
- HO 10: meat-processing machines and most work in slaughtering/meat packing/processing plants\*
- HO 11: power-driven bakery machines
- HO 12: balers/compactors and certain paper-products machines\*
- HO 13: brick/tile/kindred products manufacturing
- HO 14: many power-driven saws/shears/chippers/abrasive cutting discs\*
- HO 15: wrecking/demolition/ship-breaking
- HO 16: roofing operations and work on or about a roof\*
- HO 17: trenching/excavation (including working in trenches over certain depths)\*

Critically, in multiple HOs, “operation” is interpreted broadly and can include tasks like setting up, adjusting, repairing, oiling, or cleaning prohibited equipment—not only actively “running” a machine. That distinction can be significant for roles that are framed as “support” or “learning.”

### Hours/time limits for 14–15-year-olds (school-week constraints)

Federal limits on hours and times of day apply primarily to 14–15-year-olds, and they are a common barrier for school-year placements that aim to occur during the instructional day. In general (non-agricultural employment), 14–15-year-olds may work only:

- Outside school hours
- Up to 3 hours on a school day (including Friday)
- Up to 18 hours in a school week
- Up to 8 hours on a non-school day
- Up to 40 hours in a non-school week
- Only between 7 a.m. and 7 p.m., extended to 9 p.m. from June 1 to Labor Day

These rules create a structural mismatch for many “real shift” environments (health care, hospitality, logistics) when the student is 14–15, because the available legal windows may not align with staffing patterns, shift needs, or commute times.

### Driving as a job duty (HO 2) and why it matters for placements

Driving restrictions are often underestimated in youth placements. Under federal rules, no one under 17 may drive a motor vehicle on public roads as part of the job, and no one under 18 may serve as an “outside helper” (e.g., riding outside the cab to assist deliveries). Seventeen-year-olds may drive on public roads only under strict, enumerated conditions (daylight-only; valid license; driver education; vehicle weight limit; seat belts; and driving must be incidental and time-limited, with additional prohibited driving tasks such as route deliveries and time-sensitive deliveries). Any placement model that assumes “the student can run errands,” “deliver items,” or “ride along for deliveries” can trigger HO 2 issues quickly.

## Federal variations that sometimes intersect with work-based learning models

### Student-learner and apprentice exemptions to specific HOs (limited scope and conditions)

Federal regulations provide a limited exemption from seven of the Hazardous Occupations Orders (HOs 5, 8, 10, 12, 14, 16, and 17) for bona fide apprentices and student-learners who are at least 16, enrolled in qualifying programs, and working under defined safeguards.

This is not a blanket waiver. The exemption is conditioned on the work being incidental to training, intermittent and for short periods, and done under direct and close supervision. For

student-learners specifically, the exemption requires a written agreement between the employer and the school that includes safety instruction and a schedule of progressive work processes, among other requirements. The existence of this exemption can create confusion: stakeholders may hear “there’s an exemption,” but in practice the exemption is narrow, documentation-heavy, and only applies to specific HOs—not to all hazardous work.

### **WECEP and Work-Study Programs (WSP): modified rules for some 14–15-year-olds**

Federal law includes special program structures that modify some school-week constraints for 14–15-year-olds, but these operate as regulated exceptions rather than general flexibility:

- **A Work Experience and Career Exploration Program (WECEP)** may allow 14–15-year-olds to work during school hours and up to 23 hours in a school week, and may allow work in some otherwise prohibited occupations under a variance. However, WECEP participants still may not work in manufacturing, mining, or any of the 17 HOs, and the program requires a formal approval structure.
- **Work-Study Programs (WSP)** can vary certain Child Labor Regulation No. 3 rules for 14–15-year-olds in approved school-administered programs, including a defined formula for limited school-hours work across a four-week cycle, but they still operate within federal time-of-day and hour standards and require administrative permissions.

While these specialized program frameworks can broaden opportunity, they also add compliance complexity unless the program is already established and clearly administered.

### **Agricultural employment is governed by a different federal regime**

Federal youth employment rules differ significantly for agricultural work. In general, 16+ may work in any farm job at any time; 14–15 may work outside school hours in non-hazardous farm jobs; younger ages may work under specific conditions; and there is a separate set of hazardous agricultural occupations restricting work for those under 16. Nevada’s rural communities and ag-adjacent employers may encounter these separate standards when designing youth placements.

## **Nevada-specific youth labor constraints**

Nevada overlays additional constraints through NRS Chapter 609 (Employment of Minors) and recent statutory updates. Specifically, the Nevada rules (1) establish state-specific restrictions (especially around night work for certain high-school-enrolled youth), and (2) now more directly tie state enforcement to federal under-16 hour/condition rules.

### **Work permits and court permission**

Nevada is unusual compared to many states in that a work permit is generally not required for youth ages 14–17. However, employment for children under 14 is generally unlawful without written permission signed by a judge (district court) in the county where the child resides (with limited exceptions).

### **Nevada hour limits and night-work limits**

Nevada law places specific limits on working hours and night work:

*Under 16:* A child under 16 may not work more than 40 hours in a week or more than 8 hours in a day (with limited exceptions such as motion picture performance and farm work).

*Night work restriction for certain high school students (state-specific):* Nevada prohibits, with stated exceptions, work between 11 p.m. and 6 a.m. on a night immediately preceding a school day for a child who is enrolled in high school, is 16 or older and under 19, and is not emancipated.

Exceptions include work as a lifeguard, employee of an arcade, stage/theatrical performer, motion picture performer, or farm work. Nevada also authorizes a school district/governing body (or juvenile court) to grant an exemption if it is determined to be in the best interest of the child. This Nevada-specific night-work rule is particularly consequential in sectors where typical shifts run late (hospitality, events, some health care support roles), and it operates as a state overlay on top of the federal framework (which generally does not impose time-of-day limits on workers 16+).

### **Nevada's incorporation of federal under-16 hour/condition rules**

A major legal development affecting implementation is that Nevada law now treats certain federal under-16 youth employment rules as state-enforceable. Specifically, Nevada provides that a violation of the federal FLSA or related regulations (including 29 C.F.R. Part 570) relating to hours of work and conditions of employment permitted for a child under 16 is deemed a violation of Nevada's Chapter 609. This means that the federal "under-16" rules function not only as a federal compliance requirement, but also as a state-law compliance exposure.

### **Nevada restrictions on prohibited/dangerous occupations for minors under 16**

Nevada law also restricts the types of work minors under 16 can perform. Nevada prohibits employing a child under 16 in certain specifically identified occupations (e.g., work involving poisonous acids, paint manufacturing, match-making, certain railroad roles, work where dangerous explosives are kept, and work with hazardous machinery), and it includes a broader prohibition on employment that is "dangerous to life and limb." Nevada also gives the Labor Commissioner authority to determine that particular work is dangerous and prohibit minors under 16 from working in that job. This structure can create compliance uncertainty because one part of the rule

is categorical (specific banned occupations) and another is discretionary (fact-specific determinations of “dangerous” work).

### **Messenger/delivery time limits for minors under 18**

Nevada further prohibits minors under 18 from working as a messenger in the distribution/transmission/delivery of goods or messages before 5 a.m. or after 10 p.m. This is a narrower rule than the general night-work restrictions, but it is relevant for certain logistics, courier, and delivery-adjacent roles.

### **Penalties, posting/notice, and evidentiary presumptions**

Nevada includes criminal and administrative enforcement mechanisms for violations of Chapter 609, including misdemeanor penalties and administrative penalties. Nevada law also includes an evidentiary concept that can matter for “informal” workplace exposure models: the statute provides that the presence of a child in an establishment during working hours is prima facie evidence of employment. This provision can complicate “shadowing” arrangements if they are not clearly structured and documented.

## **IV. Low- and High-Lift Moves for Discussion**

The two tables that follow translate the friction categories into a practical menu of “moves” Nevada can consider to reduce barriers to employer participation in work-based learning. They are designed to support Commission discussion and prioritization—not a final recommendation set or a complete implementation plan. Each row is written to make the underlying logic explicit: what the move is, which employer friction it targets, and (where applicable) how the Commission can accelerate action and who is best positioned to carry it forward.

Importantly, these recommendations aim to broaden, deepen, strengthen, and build on existing momentum, current assets, and supportive infrastructure—not start from scratch. They intentionally build from what Nevada already has in motion, including NDE’s [Work-Based Learning continuum/resources](#) and [WBL User Guide \(templates + risk guidance\)](#); employer-facing entry points and “back-office” capacity in the workforce system (e.g., [EmployNV Business Hubs](#) and the [Nevada Apprenticeship Initiative](#)); and existing levers that can improve the ROI and reliability of placements (e.g., [Silver State Works](#) and EmployNV Youth Hub [Earn & Learn](#)).

The tables are intentionally split into Low-Lift Moves and Higher-Lift Moves to distinguish between actions that can typically be advanced quickly through guidance, shared tools, coordination, and small pilots versus those that generally require policy change, new funding/insurance vehicles, or multi-agency redesign. Across both tables, the moves cluster into a

few consistent themes: (1) make it easy to say yes by reducing ambiguity and reinvention; (2) reduce operational burden so participation doesn't depend on heroic effort; (3) solve logistics that routinely kill participation (especially scheduling and transportation); and (4) strengthen the employer value proposition so participation feels rational (clearer ROI and alignment to existing supports).

**How to read the tables:** In the Low-Lift table, the columns identify the action, the friction point(s) addressed, the Commission's potential role as a convener/normalizer of shared tools and expectations (without becoming the implementer), and the operators best positioned to deliver; in the Higher-Lift table, the first two columns define the action and friction targeted, while the final column provides linked examples from other states that Nevada can use as reference points for design, governance, and feasibility.

## Low-Lift Moves for Discussion

Low-lift idea	Friction point(s) addressed	Commission’s potential role	Stakeholders best positioned to carry
1) Translate the existing NDE WBL continuum into an employer-facing “Ways to Say Yes” ladder (clear time commitments, supervision expectations, and “what counts”) and distribute via hubs/chambers/associations.	Confusion about “what counts,” perceived burden; employers default to “no.”	Endorse ladder; direct a small working group to translate the continuum into an employer-friendly “menu”; push distribution.	NDE CTE; districts; local workforce boards; chambers/industry associations; OWINN
2) Package existing NDE WBL forms into a single “employer starter pack” (training agreement + training plan + vetting rubric + employer-plain-language risk FAQ + escalation steps).	Liability/risk confusion; inconsistent paperwork; unclear responsibilities.	Request an employer-facing consolidated packet; ask agencies to co-brand; recommend districts adopt as the default packet.	NDE CTE; districts; risk mgmt/legal counsel; Labor Commissioner (for child labor crosswalk).
3) Build a 1–2 page “Youth Labor Quick Guide” that links to/condenses existing Labor Commissioner guidance and adds “job vs. task” examples + common myths for priority sectors.	Legal confusion on minors’ hours/permissions/ hazardous tasks → avoidance.	Convene Labor Commissioner + NDE + AG counsel to issue a co-branded quick guide and “common scenarios” addendum.	Office of the Labor Commissioner; NDE CTE; intermediaries; AG counsel; employer associations.
4) Create a standard “Mentor Role Card” + a 30-minute micro-training (optional) aligned to NDE’s existing employer host orientation guidance; include evaluation expectations.	Supervision/training burden; uncertainty about what mentors must do.	Identify minimum common mentor expectations; promote a standard micro-training; consider recognizing employers that complete it.	NDE CTE; districts/WBL coordinators; intermediaries; chambers; sector partnerships.
5) Single directory + shared intake (lightweight): stitch together existing “front doors” (NDE WBL page, career pathways hub work, business hubs, apprenticeship) into a one-page directory + shared intake form by region/sector.	Employers don’t know who to contact; duplicative outreach; slow routing.	Convene cross-agency “no wrong door” group; assign ownership for directory + intake governance; publish and socialize.	OWINN; NDE CTE; DETR/EmployNV; local workforce boards; chambers; NevadaWorks.
6) Scheduling pattern library + credit/attendance one-pager that builds on existing credit guidance and clarifies practical models (summer intensives, block weeks, 2 half-days/week).	Seat-time conflicts; coordination with bell schedule/attendance.	Request a practical guidance memo; lift and share district patterns that work; reduce “one-off” scheduling negotiation.	NDE; districts; district attendance/credit policy owners.
7) Employer incentive “starter kit” that maps existing Nevada incentives/ supports (wage subsidies, business hub services, apprenticeship supports) + provides comms assets + ROI narrative + recognition badge.	Employers unsure “what’s in it for us”; incentives fragmented and hard to find.	Compile and publish a single incentive map; align comms; explore a lightweight recognition mechanism.	OWINN; DETR/EmployNV; local workforce boards; GOED; chambers; NevadaWorks.

## Higher-Lift Moves for Discussion

Higher-lift idea (revised)	Friction addressed	Examples from other states
1) Single employer “front door” with real triage capacity (state/regional), built by integrating existing entry points (business hubs, apprenticeship, NDE WBL info, career pathways hub work).	“Who do I call?”; fragmented systems; slow routing.	Massachusetts—Connecting Activities; Colorado—CareerWise intermediary model.
2) Standardize core templates statewide by policy/practice: adopt NDE’s existing templates as the default packet (training plan + agreement + vetting rubric), and add a simple optional safety log if desired.	Employers face “new paperwork every time”; compliance anxiety.	Rhode Island and Louisiana examples of standard agreements/templates.
3) Maintain plain-language youth labor guidance (employer-facing) by co-branding Labor Commissioner materials with WBL-specific scenarios (“job vs task,” supervision, hazardous orders).	Legal confusion → reduced participation.	Florida youth employment help desk; other states’ employer-facing child labor guides.
4) Scale an intermediary “back office” option beyond apprenticeship so employers can choose a supported model (intake, screening, paperwork, tracking/reporting; sometimes payroll).	HR/compliance burden; reporting friction.	Colorado CareerWise; intermediary models in multiple states.
5) Make WBL schedulable through credit/seat-time flexibility: clarify and expand use of Nevada’s credit for equivalent off-campus experience authority and related policies.	Seat-time constraints; scheduling conflicts.	Vermont Flexible Pathways; New Hampshire Extended Learning Opportunities.
6) Fund student supports as WBL infrastructure (transportation, gear, background checks, etc.) and braid with workforce supportive services where appropriate.	Participation barriers; reliability issues.	Massachusetts Connecting Activities; other - braided supports.
7) Scale paid internship models by expanding what already exists (e.g., youth hub models, stipend supports) and aligning them with school credit/WBL expectations.	Employer cost concerns; student reliability; equity.	Tennessee Youth Employment Program; Boston PIC models.
8) Build an employer financial incentive package for youth apprenticeship/RA using Nevada-feasible levers (wage subsidies/ reimbursements, targeted grant supports), rather than assuming a typical income-tax credit model.	Employer cost; participation threshold for deeper placements.	Michigan/South Carolina apprenticeship incentive/tax credit models (should be adapted to NV tax context).
9) Dedicated funding for WBL coordination roles (regional or district), with clear expectations for employer development, placement, supervision and reporting.	Capacity bottlenecks; inconsistent employer experience.	Delaware Pathways coordination roles; other states fund intermediaries.
10) Sector-specific compliance playbooks (healthcare, advanced manufacturing, hospitality, etc.) that integrate child labor constraints, insurance, supervision, and task lists.	High “unknowns” in priority industries; inconsistent interpretations.	Maryland sector youth apprenticeship guides; other sector-specific toolkits.

## Appendix - Acronyms and Terms Used in this brief

Term	Definition
<b>CIEE</b>	Commission on Innovation and Excellence in Education.
<b>NGCP</b>	Next Generation Career Pathways, a CIEE subcommittee.
<b>NCEE</b>	National Center on Education and the Economy, supporting analysis and option framing for the work.
<b>NDE</b>	Nevada Department of Education.
<b>LEA</b>	Local education agency, typically a school district or charter school authority.
<b>WBL</b>	Work-based learning. Structured learning that connects instruction to a workplace setting.
<b>CTE</b>	Career and Technical Education.
<b>OWINN</b>	Nevada Office of Workforce Innovation.
<b>DETR</b>	Nevada Department of Employment, Training and Rehabilitation.
<b>GOED</b>	Governor's Office of Economic Development.
<b>GWDB</b>	Governor's Workforce Development Board.
<b>EmployNV</b>	Nevada's public workforce system brand, including business facing hubs and services.
<b>NevadaWorks</b>	Northern Nevada local workforce development board, also supporting apprenticeship development.
<b>IRC</b>	Industry Recognized Credential.
<b>WIOA</b>	Workforce Innovation and Opportunity Act.
<b>FLSA</b>	Fair Labor Standards Act, including federal child labor standards.
<b>HO</b>	Hazardous Occupations Orders, federal child labor rules that restrict certain tasks for minors under 18.
<b>WECEP</b>	Work Experience and Career Exploration Program, a U.S. Department of Labor program that can allow limited flexibility for 14 and 15 year old employment when the program is approved.
<b>Intermediary</b>	An organization that helps broker placements between schools and employers and may provide support such as intake, matching, and paperwork help.
<b>Seat time</b>	Required instructional time used for attendance or credit, often measured in minutes or hours.