

**U.S. Department of Labor
Report to Congress
Enforcement of the
Child Labor Provisions of the Fair Labor Standards Act**



November 2024

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Introduction

The Department of Labor (DOL or Department) submits this report in response to the directive of the Senate Committee on Appropriations accompanying the Further Consolidated Appropriations Act, 2024 (Pub. L. 118-47), as contained on page 30 of [Senate Report No. 118-84](#):

Preventing Exploitative Child Labor—The Committee recommendation supports further efforts to combat exploitative child labor and violations of child labor provisions of the Fair Labor Standards Act and work with employers to remove child labor from their supply chains. The Secretary is directed to report to the Committees not later than 45 days after the end of the fiscal year on the Department’s efforts to enforce child labor provisions of the FLSA with particular focus on hazardous occupations, child labor trafficking and child labor exploitation, including by reporting for fiscal year 2023 and 2024: enforcement resources expended by agency including on child labor enforcement; the number of concluded cases and violations by industry; the number and type of enforcement actions imposed by industry, including the number of employers held liable for child labor violations; the number of referrals to other agencies for support or legal services for effected children and youth and the number of criminal referrals for violations of child labor provisions.

Background

The conditions that brought about child labor laws in the 1930s once seemed like a chapter from the history books, yet, over the last two years it has become clear even in today’s modern economy, 100-year-old labor problems can still emerge. Investigations by the Department’s Wage and Hour Division (WHD or the Division) have uncovered an alarming increase in the employment of children to work in dangerous conditions across industries throughout the country. Young people should have access to positive and safe first work experiences, however, children are being found in workplaces where they should not be working at all. In response, DOL has made combating the most egregious forms of illegal child labor a top priority. This report highlights what DOL accomplished in the last two years, following the launch of the WHD National Strategic Enforcement Initiative on Child Labor, which has taken a broad and inclusive approach to preventing and combating child labor exploitation through enforcement of the child labor provisions of the Fair Labor Standards Act (FLSA) and by raising awareness about this critical issue.

Child Labor Provisions of the Fair Labor Standards Act

WHD is responsible for enforcing foundational worker protections including the federal minimum wage, overtime pay, family and medical leave, labor standards for migrant workers and temporary worker programs, and the prevailing wages for federally funded service contracts and construction projects. WHD is also responsible for enforcing the federal child labor provisions of the FLSA. The federal child labor provisions were enacted to ensure that when young people work, the work is safe and does not jeopardize their health, well-being, or educational opportunities. All FLSA investigations conducted by WHD include verification of the employer's compliance with federal child labor laws. Under the FLSA, DOL assesses Civil Money Penalties (CMPs) against employers that violate federal child labor laws.

The FLSA and the federal [child labor regulations](#) establish both hours and occupational limits on the nonagricultural employment of children. *See* 29 CFR 570.2(a). Children under 18 may not be employed in any nonagricultural occupation the Secretary of Labor has declared to be hazardous (Hazardous Occupations Orders or HOs). *See* 29 U.S.C. 203(l); 29 CFR 570.2(a)(1)(ii). There are currently 17 HOs which include a partial or total ban on the employment of children in certain nonagricultural occupations or industries. *See* 29 CFR 570.50–68.

Young persons between 14 and 15 years of age may be employed in nonagricultural employment outside school hours in a variety of [non-manufacturing and non-hazardous jobs](#) for limited periods of time and under specified conditions. *See* 29 CFR 570.31–39. Children under 14 years of age may not be employed in nonagricultural occupations covered by the FLSA. *See* 29 U.S.C. 203(l). Permissible employment for such children is limited to work that is exempt from the FLSA (such as delivering newspapers to the consumer and acting). *See* 29 U.S.C. 213(c)(3)-(d). Children are generally permitted to work for businesses entirely owned by their parents, with the exception of work in mining, manufacturing, and HOs. *See* 29 U.S.C. 203(l); 29 CFR 570.2(a)(2).

Child labor regulations also limit the hours and the times of day that 14- and 15-year-olds may work in nonagricultural employment to working:

- outside school hours;
- no more than 3 hours on a school day, including Fridays;
- no more than 8 hours on a non-school day;
- no more than 18 hours during a week when school is in session;
- no more than 40 hours during a week when school is not in session;
- between 7 a.m. and 7 p.m.—except between June 1 and Labor Day when the evening hour is extended to 9 p.m.

See 29 CFR 570.31–39.

The FLSA also sets standards for child labor in agriculture. These standards differ from those for nonagricultural employment. *See* 29 U.S.C. 212 and 29 U.S.C. 213(c). Minors who are at least 16 years of age may perform any farm job, including agricultural occupations declared hazardous by the Secretary of Labor, at any time, including during school hours. *See* 29 U.S.C. 213(c)(2). Youths aged 14 and 15 may work outside school hours in agricultural occupations not declared hazardous by the Secretary of Labor. *See* 29 U.S.C. 213(c)(1)(C) and 29 CFR 570.70(a). Minors who are 12 and 13 years of age may work outside of school hours in non-hazardous jobs on farms that also employ their parent(s) or with written parental consent. *See* 29 U.S.C. 213(c)(1)(B) and 29 CFR 570.70(a). Youths under 12 years of age may work outside of school hours in non-hazardous jobs with parental consent, but only on farms where none of the employees are subject to the minimum wage requirements of the FLSA. *See* 29 U.S.C. 213(c)(1)(A). Youths of any age may work at any time in any job on a farm owned or operated by their parents. *See* 29 CFR 570.70(b).

Human Trafficking and Forced Labor

DOL also partners with federal, state, and local law enforcement agencies to detect and refer forms of child labor exploitation that are not addressed by the FLSA. For example, when conducting investigations across industries, WHD is uniquely positioned to detect and refer potential indicators of human trafficking during workplace investigations. Although the Trafficking Victims Prevention and Protection Reauthorization Act does not give WHD the authority to investigate labor trafficking, the Department is a committed partner in implementing the National Action Plan to Combat Human Trafficking. *See* Pub. L. 117-348, sec. 1, 136 Stat 6211 (Jan. 5, 2023). WHD investigators are trained to remain alert to signs of possible human trafficking, exploitation, or coercion and make referrals to the appropriate federal, state, and/or local law enforcement agencies or task forces, including to the Department of Justice's Human Trafficking Prosecution Unit (HTPU) and to the Department of Health and Human Services' (HHS) Office on Trafficking in Persons (OTIP).

DOL Enforcement Efforts to Address FLSA Child Labor Violations

Detecting child labor is an integral part of any FLSA investigation, and finding violations of federal child labor protections is an essential component of WHD's enforcement work. WHD prioritizes investigations involving workers who may be found in exploitative and potentially dangerous working conditions or in geographic areas with limited state and local protections. Vulnerable workers are often the least likely to complain due to several factors, including fear of retaliation, not knowing their rights or how to exercise them, or a mistrust of government. To reach those workers, WHD maintains a balance of complaint-based and agency-initiated investigations and works with a vast network of stakeholders that strengthen these efforts through their additional resources and protections.

WHD investigations and outreach detected an upward trend in child labor violations, and as the Division increased its focus—including acting on stakeholder leads—cases with violations increased in number and severity. From 2019 to 2024, the number of children DOL found employed in violation of federal child labor laws increased 31%. This increase is likely due to a number of factors including increased awareness about child labor and more effective enforcement. DOL enforcement data reflects WHD's work uncovering and investigating more child labor cases and is a result of the agency's focus on this critical issue.

In February 2023, DOL announced findings from a pivotal child labor exploitation case, which brought national attention to the scale and severity of illegal child labor and galvanized a whole-of-government response. One of the nation's largest providers of food safety sanitation services employed at least 102 children—from 13 to 17 years of age—in hazardous occupations to work overnight shifts at 13 meat processing facilities in eight states. Following the WHD investigation, the company paid \$1.5 million in CMPs. The employer, Packers Sanitation Services, Inc. (PSSI), provided cleaning services at facilities owned by some of the country's largest meat processing companies including Tyson, JBS, and Turkey Valley Farms.

National Strategic Enforcement Initiative on Child Labor

Following the historic PSSI case, WHD launched a National Child Labor Strategic Enforcement Initiative (National Child Labor Initiative or Initiative) to increase the focus on enforcing federal child labor laws when children are employed in exploitive conditions. The Initiative prioritizes investigations of the most egregious child labor violations, including the employment of children legally deemed too young to work or when children are employed in prohibited and/or Hazardous Occupations. Through this Initiative, WHD dedicates the resources necessary to achieve enterprise-wide or geographic-based compliance, compliance throughout supply chains, and corporate responsibility to ensure children are not exploited or put in harm's way in the workplace. In cases involving egregious violations, the nature and complexity of the

investigations require a greater use of resources, extensive planning and analysis, and a higher level of coordination characteristic of a team enforcement model.

The National Child Labor Initiative allows WHD to effectively manage and continuously learn from high-impact, evidence-based, stakeholder-informed investigation cases. Efforts carried out through the Initiative entail working closely with the Department's Office of the Solicitor (SOL) to leverage the strategic use of enforcement tools, conducting community-based stakeholder outreach to gather information and identify worker-focused resources, and coordinating with other law enforcement partners. The nature of these investigations requires an approach that can adapt to emerging information and effectively overcome obstacles and challenges that arise during workplace investigations.

Child Labor Enforcement Outcomes Fiscal Years 2023-2024

During fiscal years (FY) 2023 and FY 2024, WHD concluded a total of 1,691 compliance actions with child labor violations that found 9,822 young workers employed in violation of the FLSA. WHD assessed a two-year total of \$23,203,878 in CMPs. During this time period, WHD found 867 children employed in Hazardous Occupations in 349 of the compliance actions. As of November 2024, WHD has more than 1,000 open investigations of potential child labor violations.

WHD has found that children as young as 11 to 13 years of age are being employed for long hours, sometimes operating dangerous equipment and working in prohibited occupations. On the kill floors of meat processing plants, children are using harsh chemicals to clean back saws, head splitters, brisket saws, jaw pullers, meat bandsaws, and neck clippers. In sawmills, children are operating chop saws, rip saws, and powered wood processing machines. Teens are hauling and stacking wood for processing by automated machinery. Children are operating power-driven lifts to move pallets. In poultry processing plants, children are using sharp knives to debone chickens. In construction, minors are working on roofs and operating power-driven woodworking machines. Over the last two years, several children have been seriously injured, and some have been killed while at work.

Investigations involving egregious violations of child labor require the strategic use of multiple enforcement tools that support the investigative process, intensify deterrent effects, and maximize outcomes for workers. Through the National Child Labor Initiative, WHD has increased the use of tools that strengthen deterrent effects and provide relief to workers. DOL has collaborated with agencies and community-based organizations to identify support services to children who are employed in exploitative child labor. In FY 2024, DOL secured, via consent judgments, more than \$2.8 million in disgorged profits earned from the sale of goods tainted by oppressive child labor, which it used to provide restitution to affected child workers, and worked

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with community-based organizations to provide financial literacy education to affected children benefiting from these funds.

Table 1. Child Labor Violation Findings (FY 2023-2024)

Enforcement Finding	FY 23 - 24
Compliance Actions with Child Labor Violations	1,691
Young Workers Employed in Violation of Federal Child Labor Laws	9,822
Compliance Actions with Hazardous Occupation Violations	349
Children Employed in Violation of Hazardous Occupation Orders	867
Child Labor Civil Money Penalties	\$23,203,878

Enforcement by Industry

WHD conducts evidence-based, national strategic initiatives to identify labor standards violations across several sectors of the economy, including health care, food services, construction, building services, and agriculture. Additional strategic initiatives at the regional or local level focus on industries where data—including complaints and stakeholder leads—suggest a likelihood of violations. WHD conducts the largest share of compliance actions in the food services sector, which includes fast food restaurants. The total compliance actions and related child labor findings in an industry reflect the agency’s focus and are not a statistical prevalence rate for an industry. WHD ensures compliance with child labor requirements in all of its FLSA investigations.

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Table 2. Violations of Child Labor Laws by Industry (FY 2023-2024)

Industry	Compliance Actions with Child Labor Violations FY 23 - 24	Children Employed in Violation of Hazardous Occupation Orders FY 23 - 24
Food Services	1,108	402
Janitorial Services	23	112
Retail	130	101
Meat Product Wholesalers, Furniture Manufacturing, Sawmills, and Other Industries*	146	100
Construction	74	65
Health Care	49	29
Animal Processing	10	24
Landscaping Services	14	12
Agriculture	25	6
Utilities	1	5
Amusement	60	4
Auto Repair	10	2
Trucking	2	2
Warehousing	4	2
Hotels and Motels	23	1
Apparel Manufacturing	1	0
Child Care Services	6	0
Guard Services	1	0
Hair, Nail, and Skin Care Services	3	0
Logistics	1	0
Total	1,691	867

* “Other” refers to multiple industries across several sectors, including retail, manufacturing, building services, health care and social services, and other business services.

DOL Child Labor Enforcement Actions

Carrying out child labor investigations often requires the use of multiple enforcement tools, and many employers operate across multiple states and locations. Most investigated employers are part of a supply chain processing materials, providing services, and producing goods for nationally recognized brands. Some of these national brand companies are taking responsibility for ensuring supply chain contractors are in compliance with child labor laws. Several cases

concluded during FY 2023 and 2024 demonstrate the severity of both child labor and other labor standards violations and the ways in which DOL strategically deployed its available tools and penalties to achieve the greatest impact.

- [A1 Meat Solutions Inc., Lotus Plus Inc., Lotus Poultry Inc., Farmers Process Inc., Durfee Poultry Inc., L & Y Food Inc., JRC Culinary Group Inc. and Moon Poultry Inc.](#), are subject to a federal consent judgment ordering the employers to pay \$4.8 million in back wages and damages to 476 workers and \$221,919 in CMPs for child labor violations and willful overtime violations—one of the largest wage violation resolutions ever reached for U.S. poultry workers. The Division found the owners and operators of this network of California poultry processors and distributors illegally employed children—as young as 14 years old—to use sharp knives to debone poultry, a violation of federal child labor regulations. Pursuant to the consent judgment, the employers also must disgorge \$1 million in profits earned from the sale of goods tainted by oppressive child labor to be used for the benefit of children employed in violation of federal child labor laws.
- [The Exclusive Poultry](#) is subject to a federal consent judgment requiring the poultry processing plants to pay \$3.5 million in back wages and restitution to affected workers. Of that total, \$100,614 were back wages and \$300,000 were punitive damages paid to workers who were retaliated against by the employer. The employer also paid \$201,104 in CMPs for the employment of illegal child labor, willful overtime violations, including falsification of payroll records. WHD investigations found children as young as 14 years old employed to debone poultry, operate power-driven lifts to move pallets, and work excessive hours in violation of child labor laws.
- [Fayette Janitorial Service](#) paid \$649,000 in CMPs and agreed to hire an outside consultant to prevent the employment of children. WHD investigators discovered Fayette Industrial employed at least 24 children—some as young as 13 years old—at meat processing facilities in Virginia and Iowa to clean dangerous kill floor equipment—such as head splitters, jaw pullers, meat bandsaws, and neck clippers—during overnight shifts. At least one 14-year-old at the Virginia facility suffered severe injuries while employed by Fayette.
- [Florence Hardwoods](#) paid \$190,696 in CMPs to resolve its child labor violations and address DOL’s objection to the shipment of “hot goods” produced in an establishment that had employed oppressive child labor. Following a 16-year-old worker’s death at a Wisconsin sawmill, a WHD investigation found the company unlawfully employed nine children, ages 14 to 17, to illegally operate dangerous machinery, including a chop saw and rip saw, and children were also employed to work outside the legally permitted hours. The day after the teen’s death, Florence Hardwoods ended the employment of all children under age 18 at its facility and later verified to the court that no one under the age of 18 is currently employed by the company.

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- [Monogram Meat Snacks](#) paid \$140,164 in CMPs and is subject to a federal consent judgment requiring the company to take specific steps to ensure compliance, including hiring a third-party consultant to conduct nationwide audits, establishing a toll-free number for employees to report potential child labor compliance issues anonymously, and identifying and marking hazardous equipment. WHD investigators found at least 11 children, ranging in ages from 15 to 17 years old, employed unlawfully, including nine children operating hazardous machinery.
- [Tuff Torq Corporation](#) is subject to a federal consent judgment requiring the parts manufacturer to follow federal child labor laws and to pay \$296,951 in CMPs for its employment of minors in hazardous occupations. WHD found several children employed in violation of the hours standards and/or in Hazardous Occupations, including one child who was observed operating a power-driven hoisting apparatus. Tuff Torq was also ordered to set aside \$1.5 million as an estimate of 30 days' profits from the sale of goods tainted by oppressive child labor. After reviewing evidence as to the amount of profits, the parties agreed that Tuff Torq would disgorge over \$900,000 in profits, which will be used for the benefit of children employed illegally. The employer also agreed to several enhanced compliance provisions, including a tip line for workers and vetting labor and vendor contracts for child labor compliance.
- [Walnut Creek Lumber](#) paid \$22,093 in CMPs following a WHD investigation that found the employer illegally employed a young worker in a facility that used machinery to operate a sawmill and four other minors under age 16 to work outside the hours allowed by the FLSA. A 15-year-old worker suffered injuries after becoming entangled in the chain and gears of equipment that transferred wood product from the point of loading to another piece of machinery for processing.
- [Win.IT](#) is subject to a federal consent judgment requiring the warehouse and distribution center to pay \$30,276 in CMPs and to hire a third-party consultant to provide compliance training for all management personnel for a period of three years. A WHD investigation found the company employed two children—ages 11 and 13—for months at its distribution center in prohibited occupations and for more hours than legally allowed. Violations included employing one child to operate a forklift—a Hazardous Occupation for workers under 18 years of age—and tasking another child to pick orders in the warehouse, a prohibited occupation for workers under 16 years of age.

Penalties and Tools to Ensure FLSA Child Labor Compliance

DOL is using all available enforcement tools and its full authority to stop illegal child labor when found, to penalize employers that violate the law, and to ensure employers remain in compliance with the law. Through collaborative strategies between WHD and SOL, DOL works to employ all available legal authorities to protect children and address supply chain accountability. Enforcement and litigation tools include hot goods, search warrants, temporary restraining orders, preliminary injunctions, subpoenas, CMPs, disgorgement of profits earned from the sale of goods tainted by oppressive child labor, and enhanced compliance agreements. The strategic use of these enforcement tools, combined with publicizing egregious findings from investigations, collaboration with the Occupational Safety and Health Administration (OSHA) and state partners, efforts to combat human trafficking when it arises in child labor cases, and strategic use of media has allowed DOL to effectively combine strategies and tools to stop violations and create ripple effects across industries and geographic areas leading to greater accountability and better industry practices. Penalties are being levied in combination with other legal tools, including consent judgments that target employer practices. These tools and resolutions through consent judgments include, for example, nationwide injunctions, requirements for employers to hire third-party consultants, requirements for partnerships with culturally competent community-based organizations, and employer commitments to conducting trainings on child labor for management and other employees.

Remedies and tools critical to deterring and addressing systemic violations, ensuring compliance, and maximizing protections for workers include:

- **Civil Money Penalties:** Section 16(e)(1)(A) of the FLSA (29 U.S.C. 216(e)(1)(A)) gives WHD the authority to assess CMPs against employers that employ children in violation of federal child labor protections. Any person who violates the provisions of FLSA section 12 or 13(c) (29 U.S.C. 212 or 213(c)), or any regulation issued pursuant to such sections is subject to a civil penalty not to exceed—(i) \$15,629 for each employee who was the subject of such a violation; or (ii) \$71,031 with regard to each such violation that causes the death or serious injury of any employee under the age of 18 years, which penalty may be doubled where the violation is a repeated or willful violation.¹ See 29 U.S.C. 216(e)(1)(A)(i)-(ii). WHD assesses child labor CMPs per violation as authorized in the statute.

¹ The Federal Civil Penalties Inflation Adjustment Improvements Act of 2015 (IAA), Pub. L. 114-74, sec. 701, required agencies to adjust CMP levels for inflation through an initial adjustment by August 1, 2016, followed by annual adjustments every January thereafter. In accordance with the IAA, on July 1, 2016, the Department of Labor published an Interim Final Rule making the initial adjustments to all CMPs assessed in statutory programs that it administers, including CL CMPs, with the adjustments effective August 1, 2016. As required by the IAA, the Department also adjusts CL CMPs for inflation every January. For more information about the IAA and to view the current CL CMP levels, visit <http://www.dol.gov/whd/flsa/index.htm#cmp>.

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- **Hot Goods:** Preventing the shipment of “hot goods” is a critical tool for addressing compliance throughout supply chains where appropriate. The FLSA prohibits the shipment of goods in interstate commerce that are produced in an establishment in or about which oppressive child labor has been employed in the past 30 days. *See* 29 U.S.C. 212(a).

- **Disgorgement:** Disgorgement is an equitable remedy requiring a party who profits from illegal or wrongful acts to give up their ill-gotten gains, that is, any profits they made as a result of that illegal or wrongful conduct. WHD has, for instance, reached agreements with employers that place the profits attributable to the sale of goods produced in violation of federal child labor laws into a fund to provide restitution for or to otherwise benefit, children who were employed in oppressive child labor.

Working with Enforcement Partners, Stakeholders, Communities, and Industry to Prevent Child Labor Exploitation

Violations of child labor laws impact communities, require coordinated enforcement approaches, and serve as a call to action for industries. DOL cultivates partnerships with stakeholders, including industry, around the shared goal of improved compliance, and WHD relies on a vast network of stakeholders to strengthen and broaden the reach of its enforcement and outreach strategies. WHD is strengthening and expanding partnerships with community-based organizations, worker centers, unions, industry associations, consulates, faith-based organizations, and worker advocacy groups. Many of these worker-focused stakeholders serve as trusted intermediaries to vulnerable or underserved populations that are reluctant to seek help from government agencies. These stakeholders can provide critical information for finding and substantiating violations of child labor laws and amplify efforts to share information and educate workers. WHD outreach to schools, worker advocates, community-based organizations, and job training programs are raising awareness about child labor laws, providing opportunities to discuss possible violations in communities, and emphasizing WHD's role as a resource.

WHD conducted more than 3,600 child labor outreach events through local offices between FY 2023 and FY 2024. WHD also participated in 16 national child labor focused webinars hosted by various stakeholders representing employers, federal agencies, advocates, and others who have a role in helping to identify and/or stop exploitative child labor. These webinars provided WHD the opportunity to educate over 4,300 attendees on child labor regulations, including permissible work hours for minors, prohibited jobs, and common compliance issues. During FY 2024, WHD expanded outreach efforts and the range of materials available to employers (including many industry-specific materials), young people, parents, teachers, and community leaders.

WHD is collaborating with the Department's Employment and Training Administration to provide "know your rights" information to young workers nationwide through resources and expanded programming and partnerships. WHD officials participated in the 2024 National Youth Employment Coalition Annual Forum to share information about the importance of young people knowing their rights in the workplace and how to overcome challenges with asserting those rights given power dynamics and imbalances in the workplace.

Ensuring Positive First Job Experiences through Industry Compliance Assistance

Since 2023, the scope and nature of child labor findings across the food service industry have garnered national media attention and prompted a public response from many national corporations seeking to ensure their franchisees, contractors, and supply chains are operating in compliance. To assist the restaurant industry in complying with child labor laws, in 2023, national brands partnered with WHD to deliver webinars highlighting best practices and child labor compliance strategies. In 2024, the Division continued to work directly with employers and corporate headquarters to help address compliance issues so that employers will provide positive, safe, first work experience for young people. WHD also hosted a child labor symposium in June 2024 that featured panelists from the Division and other DOL agencies—OSHA, the Employment and Training Administration, and the Bureau of International Labor Affairs—and the not-for-profit National Migrant and Seasonal Head Start Association.

Through the WHD [YouthRules!](#) initiative, the Division and its partners promote positive and safe work experiences with resources, videos, presentations, social media outreach, and ongoing community engagement. Employer-focused resources include the [Seven Child Labor Best Practices for Employers](#), which lists different ways businesses can ensure compliance with child labor laws. Examples include establishing an internal phone number that allows workers to report child labor violations and providing workers under the age of 16 with a different color nametag than those worn by older workers. The [Young Worker Toolkit](#) provides a comprehensive set of information resources designed to help teens make the most of their work experiences and understand their rights. Young workers and parents have access to printable informational bookmarks, [videos](#), a [template](#) and [calendar](#) for tracking hours worked, [flyers](#), [public service announcements](#), and a [comprehensive youth employment guide](#). [WHD Fact Sheets](#) provide general information on the application of the FLSA to employees in a range of settings, including young workers in restaurants, retail, and recreation. Employer self-assessment tools provide guidance to employers for evaluating their level of compliance—including tools specific to grocery stores and restaurants.

Educating and Detecting Child Labor through Community Engagement

At the community level, WHD is working with a range of stakeholders to raise awareness, detect violations, and educate, as illustrated in the following efforts.

- In Pennsylvania, WHD established an alliance with OSHA and the Lehigh Career & Technical Institute. The alliance has led to training opportunities, discussions around child labor trends, and future opportunities to raise awareness about child labor in industries, such as warehousing. WHD officials also delivered child labor training to food

facility inspectors at an Erie County, Pennsylvania Department of Health training event, including how to file a complaint.

- WHD officials are engaging administrators, counselors, and staff in public school systems to raise awareness about the increase in child labor violations and provide information on child labor laws. In Alabama, WHD met with counselors in the public school system to educate them about child labor exploitation and how schools can partner to protect youth. In Tennessee, WHD met with school administrators and staff to discuss potential indicators of child labor, including absenteeism, truancy, and late arrivals.
- WHD is also connecting school systems with resources designed for educators, parents, and students. In North Carolina, WHD is providing child labor training as part of career and technical education for middle school students. In California, WHD is working with the U.S. Attorney's Office in Los Angeles on an initiative educating parents, students, and educators in the unified school district—the second largest in the country.
- Participating in program events allows WHD to reach a broad audience and further build its stakeholder network, which is particularly helpful in reaching migrant families. In Florida, WHD officials are delivering Spanish-language presentations through the Migrant Education Program.

Expanding Reach and Impact through a WHD and OSHA Partnership

WHD and OSHA reinvigorated a longstanding partnership to leverage each agency's distinct authorities to protect the health and well-being of the nation's workers. This partnership includes close communication and coordination, collaboration on education and outreach efforts, and ensuring referrals are made and joint investigations are conducted where appropriate to maximize worker protections under the laws enforced by each agency. WHD and OSHA staff are working together to provide compliance assistance, conduct outreach events, and meet with stakeholders. OSHA has also developed [resources](#) to help ensure the safety of children when they are working and has pursued education and outreach to reach young workers nationwide. OSHA has developed alliances with educational institutions and other organizations specifically focused on reaching young workers with information about workplace safety and health. The following are examples of OSHA collaborations around enforcement and outreach.

- [JVS Roofing](#) agreed to pay \$92,640 in back wages to affected workers and \$6,399 in CMPs for a child labor violation. Following a 17-year-old worker's fall from the roof of a home improvement store in Pennsylvania, a WHD investigation found that the employer hired the teenager for roofing work, an occupation defined as hazardous for young workers by the FLSA. Further investigation into the employer's pay practices found 30 workers misclassified as independent contractors, thereby illegally depriving them of overtime pay for hours worked beyond 40 in a workweek. A subsequent [OSHA](#)

[inspection](#) resulted in a citation for four serious safety violations and \$16,500 in penalties.

- [JGN Services, LLC](#) agreed to pay \$106,600 in back wages and liquidated damages for 18 workers and \$55,841 in CMPs. WHD investigators found the employer in violation of three hazardous occupations orders, including roofing and using power-driven woodworking machines. WHD also determined the employer had misclassified some workers as independent contractors and did not pay employees overtime rates for hours over 40 in a workweek. The WHD investigation resulted from a referral from OSHA, who learned an injured worker was 15 years old. The [OSHA inspection](#) followed the young worker's fall from the roof of a two-story home, which led the teenager to suffer severe head and spinal injuries.
- The Centers for Disease Control and Prevention (CDC) National Institute for Occupational Safety and Health (NIOSH) has a longstanding partnership with OSHA to develop and disseminate young worker safety and health outreach materials. This includes the NIOSH [Youth@Work--Talking Safety](#) curriculum, an evidence-based workplace safety and health curriculum designed to equip middle and high school students with foundational knowledge and skills pertaining to workplace safety and health rights, hazards, and protections. This curriculum has been customized for each state, Washington D.C., Puerto Rico, and the U.S. Virgin Islands to address their specific child labor rules and regulations. NIOSH is also collaborating with the OSHA Young Worker Alliance on a campaign to increase awareness and promote workplace safety and health resources for teen workers and help share this information with teens, parents, teachers, and employers ([#KeepTeenWorkersSafe](#)). NIOSH and OSHA also developed a checklist for small businesses employing young workers as part of the [OSHA/NIOSH Small Business Handbook](#). This handbook is consistently one of OSHA's most downloaded resources. In 2020, NIOSH launched a five-year study in partnership with the OSHA Office of Training and Education, the American Federation of Teachers, and the Miami-Dade County Public School System, to develop and evaluate a customized, interactive workplace safety and health training tailored for younger workers.

Expanding Compliance Strategies through Federal Interagency Task Force to Combat Child Labor Exploitation

Through the Interagency Task Force, DOL is leading federal efforts to increase the focus on child labor. The following examples of interagency collaboration highlight different ways WHD has worked with other federal agencies to educate key stakeholders and advance shared goals around children's safety, opportunities, and well-being.

- In March 2023, DOL and HHS entered into an [Inter-Agency Data Sharing Memorandum of Agreement](#), which formalized an ongoing partnership between the agencies and

outlined procedures the agencies will follow as they work together to deepen information-sharing, coordination, cross-training of staff, and public education efforts. The departments have successfully collaborated on cross-training initiatives for over 250 WHD managers and over 1,500 HHS staff and grantees. The agencies share data and information on an ongoing basis to further assist WHD in identifying risks of child labor violations.

- The *Department of Education (ED)* is sharing child labor information through newsletters, websites, and social media, ensuring that stakeholders in education have a greater understanding about the issue and can further inform young people and families about their rights. For example, in November 2023, ED's National Center on Safe Supportive Learning Environments hosted a [webinar on child labor exploitation](#) with WHD staff, school-based partners, and an advocate with lived experience in exploitative child labor to inform education stakeholders and explain the important role that teachers can play in helping to address unlawful child labor.
- The *Department of Justice (DOJ)* and DOL are partnering through the Legal Orientation Program for Custodians of Unaccompanied Children (LOPC) to educate custodians of unaccompanied children on federal child labor laws and protections through new materials and information provided during the LOPC orientations. WHD has trained LOPC's service providers nationwide and is connecting them with WHD District Offices to ensure ongoing communication. DOL is also partnering with DOJ's Office of Victims of Crime to ensure that their grantee service providers for victims of crime have greater awareness about exploitative child labor, information on how to report suspected child labor violations, and resources to share with their clients and communities.
- The *Department of State (State)* and DOL are partnering to educate embassies and consulates on child labor. For example, in the summer of 2023, State and DOL briefed ambassadors and embassy leadership from Colombia, El Salvador, Guatemala, Honduras and Mexico on efforts to combat exploitative child labor in the U.S., including efforts to address the employment of migrant children in oppressive child labor. The agencies followed these briefings with five trainings on federal child labor law in Spanish for consular staff nationwide and provided Spanish-language resources for consulates to further educate immigrant and migrant communities.
- The *Department of Commerce (Commerce)* is working to include a child labor provision in the Standard Terms and Conditions section of its financial assistance award contract that will apply to all financial assistance programs at all the bureaus at Commerce. The provision reinforces an employer's existing obligations under law to comply with the FLSA, including the child labor provisions, by prohibiting the use of any oppressive child labor by recipients, sub-recipients, contractors, and subcontractors receiving funds through any Commerce financial assistance programs and initiatives. Pursuant to this contractual provision, a violation of the provision could result in an FLSA enforcement action and termination of the financial assistance award.

- The *Department of Homeland Security (DHS)* is leveraging its resources and relationships to amplify the DOL's efforts to combat child labor exploitation and to educate key stakeholders on federal labor law. For example, in January 2024, WHD presented at the first annual DHS Center for Countering Human Trafficking Anti-Trafficking Symposium on "WHD's Role in Combating Child Labor Exploitation and Detecting and Referring Human Trafficking."

Detecting Labor Trafficking and Referral to Criminal Law Enforcement

If WHD investigators identify indicators of human trafficking, they may notify HHS and make a referral to DOJ. In FY 2023 and 2024, WHD received or detected credible information that a child might have been a victim of trafficking, resulting in notification to HHS' OTIP, which then determines eligibility for services and benefits, in relation to 43 workers who were possibly minors. WHD also provided 11 referrals involving indicators of trafficking of potential minors to the DOJ HTPU or to local Human Trafficking Task Forces. Through the Child Labor Interagency Task Force, HHS continues to share information on unlawful child labor with key constituencies and incorporates it into relevant programming, including the [HHS National Human Trafficking Prevention Summit](#) held in August 2023.

WHD is also working to educate stakeholders about the spectrum of labor exploitation. In different contexts, workers may experience different severities of exploitation, with labor trafficking as the most severe. WHD endeavors to clarify the relationship between child labor exploitation and trafficking and ensure that anti-trafficking organizations and task forces are informed about the rise in child labor exploitation and know how to make appropriate referrals. DOL routinely works with criminal law enforcement agencies, most often through human trafficking task forces comprised of federal, state, and local law enforcement and victim service providers. For example, WHD actively participates in over 70 human trafficking task forces currently. Within these task forces, law enforcement entities discuss case collaboration and share information where appropriate. WHD also assists federal and state prosecutors in the calculation of restitution for victims.

Enhancing and Expanding Partnerships with State Labor Agencies

WHD has built strong relationships with state agencies to foster communication and better serve the nation's workers and businesses. State labor agencies can serve as key partners in strengthening WHD efforts to enforce labor standards, particularly child labor laws. To further define and formalize these partnerships, WHD has established Memorandums of Understanding (MOUs) with many states and territories. These MOUs establish mutual goals around the laws enforced by WHD, and the terms vary by state. MOUs may set expectations and define processes for data sharing, referrals, coordinated enforcement, joint outreach, and compliance

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assistance. WHD's 54 district offices across the country are also engaging with state labor agencies, state attorneys general, state licensing agencies, and the U.S. Attorney's Offices to increase awareness and coordination around illegal child labor and to identify opportunities for joint outreach, enforcement, and cross-training.

WHD recognizes the importance of clearly communicating with the public about how state and federal laws interact. WHD publishes [online](#) information about state child labor laws. In turn, WHD has requested that each state clarify the relationship between federal and state laws on their websites and in other materials for the public. Importantly, when child labor laws at the state and federal levels differ, the most worker-protective law that applies to a particular employer prevails. While some states have more protective child labor laws than the federal government, other states have less protective standards—which is to say that they fall below the federal floor. DOL continues to emphasize with all states and territories that the FLSA and its child labor protections apply to FLSA-covered employers in all states in this country, and no state can limit these provisions.

Ongoing and Future Efforts

Since the launch of the National Child Labor Initiative, DOL has used strategic enforcement and the tools at its disposal to prevent, address, and combat unlawful child labor. DOL will continue its robust enforcement as it develops new partnerships and works with a broad cross-section of stakeholders who can strengthen enforcement strategies, amplify outreach and education efforts, and build trust with communities at greatest risk of experiencing violations.

As WHD undertook investigations of child labor violations with historic findings, the agency's investigative ranks reached a 50-year low following a decade of effectively flat funding and budget uncertainty. The increased focus on child labor violations requires shifting resources from other enforcement priorities at a time when WHD is operating with a considerably reduced number of investigators, and SOL has lost more than 100 staff since 2013, a 17 percent decline.

The Administration continues to call on Congress to pass legislation to strengthen enforcement. This includes increasing funding for WHD and SOL. It also includes giving DOL the ability to assess penalties at a level that would measurably deter violations and increase the consequences for egregious violations of the law. The maximum CMP under current law for a child labor violation is often too low to effectively deter violations among profitable corporations. The Administration has called on Congress to increase penalties to levels that will strengthen protections for people who report child labor law violations and investigations of corporations flouting child labor laws.

With over 1,000 active investigations of child labor, WHD will continue to focus resources on the most dangerous workplaces and combating illegal child labor. WHD, in collaboration with SOL, will build on a track record of using evidence and all available legal and enforcement tools to deliver impact. WHD expects that, with growing awareness and success, the agency will receive more leads and continue to uncover violations, given the extent of this alarming issue. As some states roll back protections for youth workers in ways that are both potentially dangerous and confusing, they are weakening child labor laws in ways that are, in many instances, in conflict with long-standing federal protections, which complicates employer efforts to comply. For example, state lawmakers have proposed or passed laws lifting restrictions on hazardous jobs for children, expanding permitted work hours, eliminating work permit requirements, and paying minors below the federal minimum wage. While employers subject to the FLSA must comply with federal child labor laws in all states, regardless of state law, these conflicting state laws can confuse employers and thwart federal enforcement.

DOL is as committed as ever to ensuring that these foundational protections allow all young people the opportunity to work in safe, age-appropriate jobs; to pursue their education; and to be protected and provided the opportunity to thrive. Safeguarding young workers is a bedrock

principle upon which the WHD mission was built. While positive and safe first work experiences can allow young people to develop skills, earn money, and learn what it means to be part of the labor force, a job should not jeopardize a child's well-being or their educational opportunities. Protecting children will remain a top priority.