

Department of Labor meeting with TMA February 22, 2017

“Can 16 and 17 year old students be employed in manufacturing?”

IL State Board of Education meets DOL requirements for approved vocational programs

Employers may contact school and/or Education for Employment [System Director Directory](#) to verify mfg. program of study.

Some students earn industry credentials. I.E. American National Standards (ANSI) metalworking industry

- NIMS Credential Lathe, Drill Press, Bench Work, Layout
- NIMS Credential Mill 2, Lathe 2, Grinding 1
- NIMS Level 1 CNC Operator Credential
- CNC Milling: Programming and Setup Operations Level 1
- Manufacturing Skill Standards Council (MSSC)
 - Safety
 - Measurement & Continuous Improvement
 - Manufacturing Processes
 - Maintenance Awareness

Teachers/ counselors at the local school can verify student coursework.

- List of Career and Technical Education courses student has completed
- List of Career and Technical Education courses student is currently enrolled in
- Contact information for Career and Technical Education teacher
- Student safety training at the high school

Department of Labor Requires Documentation be kept on file at school and work place

Such student-learner is employed under a written agreement which provides:

- That the work of the student-learner in the occupations declared particularly hazardous shall be incidental to his training;
- That such work shall be intermittent and for short periods of time, and under the direct and close supervision of a qualified and experienced person;
- Those safety instructions shall be given by the school and correlated by the employer with on-the-job training.

Department of Labor (DOL) References

DOL allows 16/17 year old students to be employed to use machines in very specific areas.

- HO5 Power Drive Woodworking Machines
- HO8 Power Driven metal-Forming Punching, Shearing Machines
- HO 14 Power Driven Saws, Abrasive Discs

DOL requires student be enrolled in training program authorized and approved by a **state board of vocational education**

- Supplemented by and integrated with a definitely organized plan of instruction designed to teach technical knowledge and related industrial information given as a **regular part of the student learner's course** by an accredited school, college, or university.
- Provides for **part-time employment training** which may be scheduled
 - ☐ part of the work day
 - ☐ part of the work week
 - ☐ alternating weeks
 - ☐ other limited periods during the year (summer)

Source: 29 CFR 520.300 – Definitions

DOL Definition of a Student Learner

- At least sixteen years of age
- Is receiving instruction in an accredited school, college or university
- Is employed by an establishment on a part-time basis, pursuant to a bona-fide vocational training program.

Source: 29 CFR 520.300