

Navigating Legalities and Logistics

Hosting Manufacturing Interns Under Age 18

Can a student under age 18 work on the floor?

Yes, students 16 years old or older can work in a factory setting as student learners. According to [Child Labor Provision for Nonagricultural Occupations under the Fair Labor Standards Act, Child Labor Bulletin 101](#), a high school student at least 16 years old can work in a factory setting and conduct welding, machining, and other manufacturing operations.

Minors under the age of 18 are prohibited from performing certain operations or working in certain industries even as student learners or apprentices. For example, minors under age 18 may not operate motorized vehicles or power-driven hosting apparatus. Companies should consult with their legal counsel for guidance regarding these limitations and take appropriate steps to ensure that minors do not engage in prohibited work.

Can this work in a union environment?

Yes, it is possible. Introducing a high school internship program requires multiple up-front conversations and integration with your local union leadership and workforce. Processes and guidelines can help ensure the program is sustainable and does not violate the key tenants of any labor agreements.

Does insurance coverage stay the same?

Most likely. Prior to offering an internship, employers should contact their insurance company for clarification on who/what their liability insurance covers. As long as the internship does not violate any of the federal restrictions on child labor or restrictions in Illinois, insurance should cover a 16+ student.

Who covers the liability?

Paid student workers under age 18 should be covered under the manufacturer's liability insurance, just as any other paid employee.

Still facing barriers to hosting students under 18?

As you work with your human resources, legal, and insurance teams to develop an internship program, consider roles that don't raise the same concerns as the production floor, such as CAD design, customer service, quality, and production. To expose students to a variety of occupations within manufacturing, companies have taken a job shadow and departmental rotation approach to hosting interns.

This document does not constitute legal advice. Please consult with legal counsel to ensure your internship program complies with applicable law.

RESOURCES

- ↪ The Department of Labor presented on "[Can 16 and 17 year olds be employed in Manufacturing?](#)" to the Technology & Manufacturing Association, which created one-page [DOL synopsis](#).
- ↪ McHenry County created a [16, 17, & 18 Year-Old High School Student Interns Activity Guide](#), which helps companies navigate insurance for interns under 18 years old.

COMMUNITY EXAMPLE

At Swiss Automation Inc., interns go through the hiring process, new hire orientation, and safety training. They also ensure supervisors/mentors are always paired with the intern, to lower the amount of autonomy interns may have with potentially dangerous equipment. Through a department rotation, interns are exposed to different jobs within manufacturing. An intern may spend a half day in Quality inspecting parts for conformity and a half day working with Production on some planning documents. Their summer schedule includes:

- Week 1: Quoting, Engineering, Customer service, Planning, and Materials
- Week 2: Quality, Blueprint basics, Gages, Inspection of product, and Non-conformance
- Weeks 3 & 4: Programming, maintenance, and tool room; ENC; CNC
- Week 5: Inventory management, Receiving, Shipping