

# CHILD LABOR LAWS, REVISITED:

A Review of Legislative Trends and Long-Standing Protections



MIDWEST

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This committee is led by Nebraska Sen. Jana Hughes and Minnesota Rep. Bernie Perryman, co-chairs; and Kansas Rep. Mari-Lynn Poskin, vice chair.

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# A Revisiting of Child Labor Laws

## Recent activity reflects central, and historical, role played by states

Since at least the beginning of this decade, a growing number of state legislatures, inside and outside the Midwest, have been re-evaluating existing child labor laws, including those that restrict the types of professions and hours teenagers can work.

For some people, the term “child labor” may seem like a phenomenon from a bygone era or harken a mental image of children operating industrial looms on the factory floor of a nondescript textile mill in the late 19th or early 20th century. In fact, it was such images and testimony collected by Progressive Era muckrakers like Jacob Riis and Lewis Wickes Hine that influenced, in part, many state legislatures to pass bills and seek to ratify a (ultimately unsuccessful) constitutional amendment restricting the practice of child labor. In 1938, successful state efforts were complemented by a national framework with the passage of the Fair Labor Standards Act.

Today, employers are subject to that federal law as well as the varying child labor statutes across 50 states. For young workers and businesses covered under both the FLSA and state law, the more protective of the two (state or federal) applies. For young workers not covered by the FLSA, child labor protections fall squarely on the states.

In recent years, industry trade groups and others have made an argument for state legislatures to loosen certain child labor restrictions, at least in part to help address workforce shortages in various sectors (often in lower-wage jobs). Examples of the sought-after changes include allowing teen workers to be employed in a larger selection of jobs; to handle equipment, items and goods previously off limits to them; and to work later night hours throughout the year.

At the same time, state policymakers have been looking to bolster protections for young wage earners. Laws have been enacted to improve state-level oversight of employers and strengthen registration requirements. Other measures are limiting employment in higher-risk jobs and establishing safeguards for young “vloggers” (individuals who participate in video blog series on multimedia websites such as YouTube).

This Issue Brief looks at both types of child labor trends in the Midwest – the loosening of certain restrictions on the one hand, and the addition of new safeguards on the other.



HISTORICAL PHOTO  
Little Fannie, age 7 and 48 inches tall, helps her sister in Elk Mills. Fayetteville, Tennessee (1910)

Source: Library of Congress

# A changing youth labor market

## Long-term decline in labor participation

According to the Federal Reserve Bank of St. Louis, in August 2025, 35 percent of 16- to 19-year-olds were participating in the labor force. (Participation means either having or looking for employment.)

Excluding the unique interruptions experienced in 2020, this end-of-summer percentage constitutes the lowest participation rate since August 2018. It also is well below the historic peak of 59 percent participation, which occurred in August 1978. (The Federal Reserve's yearly participation rates date back to January 1948.)

In 1978, the idea of dropping out of high school to work full-time and embark on a career was, comparatively, more feasible than it is today due in part to the lower level of educational attainment needed for many professions.

According to the National Center for Education Statistics, of the approximately 738,000 youths who had recently dropped out of high school in the year 1980, nearly 64 percent were participating in the labor force, of which around 44 percent were actively employed.

By comparison, federal data from 2022 (the latest year available) shows there were approximately 538,000 recent high school dropouts. Only about 42 percent were participating in the labor force, of which around 34 percent were employed.

Researchers at the Georgetown University Center on Education and the Workforce project that by the year 2031, approximately 72 percent of all jobs will require some level of postsecondary learning. In 1983, the figure was closer to 32 percent.

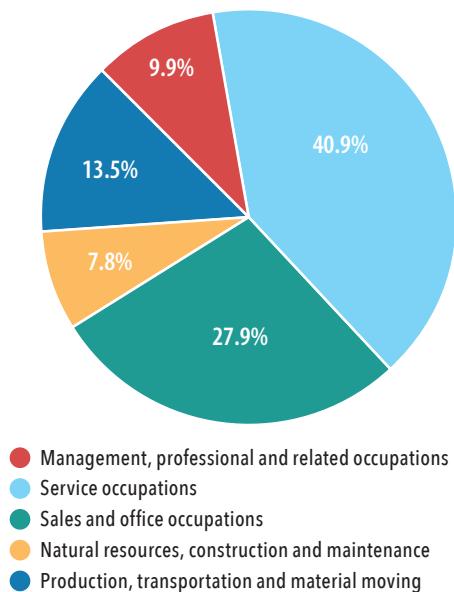
### VALUE OF 'HIGH QUALITY' WORK

This is not to say that the primary driver behind child labor is a desire among teenagers and their families to forfeit a high school education in order to find immediate, full-time employment. A 2023 national survey conducted by the University of Michigan's C.S. Mott Children's Hospital asked the parents of teenagers between the ages of 14 and 18 about their children and employment. Of those surveyed, over half responded that having a job had a positive impact on their teens' understanding of money management, self-esteem and time management.

At the same time, more than 10 percent of respondents said working a job negatively affected the amount of sleep their child got, as well as the ability of their child to engage in social activities with peers. About one-half of the survey respondents were the parents of an 18-year-old; 42 percent had working children between the ages of 16 and 17; and 8 percent were the parents of employed 14- or 15-year-olds.

A 2024 academic study published in the *Journal of Research on Adolescence* explored whether the working experiences and occupational skills that teenagers gain from having a job were still being applied into adulthood. The longitudinal study assessed a sample of more than 1,000 public school students in St. Paul, Minn., who were in the ninth grade in 1988. In looking at different dimensions of work quality – for example, work stress, autonomy, wage satisfaction and advancement opportunities – the researchers found “continuity in adolescent and adult work quality in six of the seven dimensions, suggesting that youth in high-quality jobs tend to have similar high-quality occupational features in adulthood.”

### The teen workforce: Breakdown of 16- to 19-year-old workers, by occupation type (2024)\*



\* In 2024, the five most common jobs for this age group were 1) cashier, 2) waiter/waitress, 3) fast food and counter worker, 4) cook, and 5) retail sales.

Source: U.S. Bureau of Labor Statistics

The emphasis here is on teens being exposed to “high quality” jobs, which the authors loosely define as “work that fosters satisfaction and involvement.”

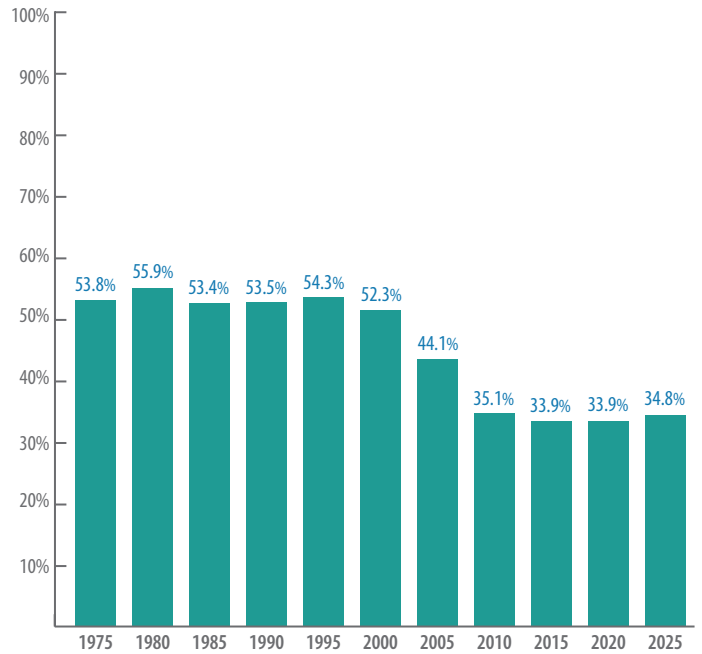
There are examples of state programs in the Midwest that recognize the importance of work quality when designing work-based learning opportunities for young people.

One such example is Indiana’s Career Scholarship Account program. Launched in 2023 with the passage of HB 1002, the state annually allots high school student applicants up to \$5,000 that can go toward a menu of career education opportunities, including enrollment in a youth apprenticeship program.

Eligible program providers must demonstrate that their on-the-job training will be rigorous, allow participants to learn a variety of transferable skills, and culminate in the student earning an industry-recognized credential. Lawmakers have also amended the state’s high school graduation requirements to offer an alternative pathway for students who choose to pursue an advanced level of this out-of-the-classroom learning.

For most young workers, of course, jobs are not tied to a state’s K-12 education system. But states still play a critical role in the opportunities and protections that young people are afforded in the broader workforce.

### Changes in labor force participation among U.S. 16- to 19-year-olds (for the month of August)\*

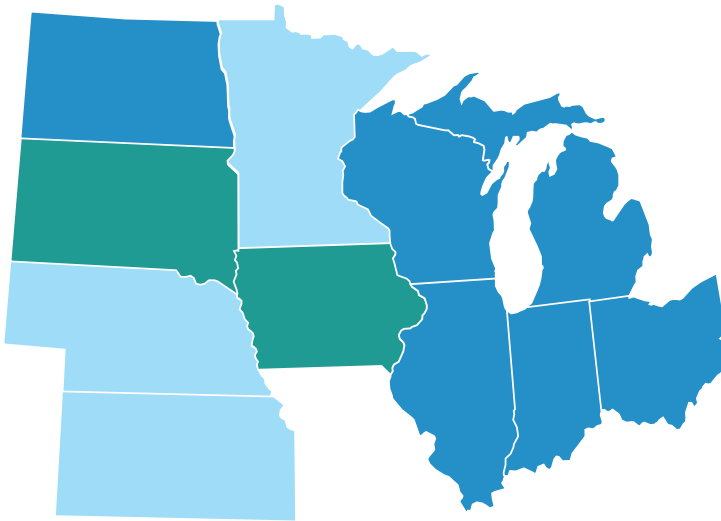


\* Percentages are seasonally adjusted. Participation means either currently having or actively seeking employment.

Source: Federal Reserve Bank of St. Louis

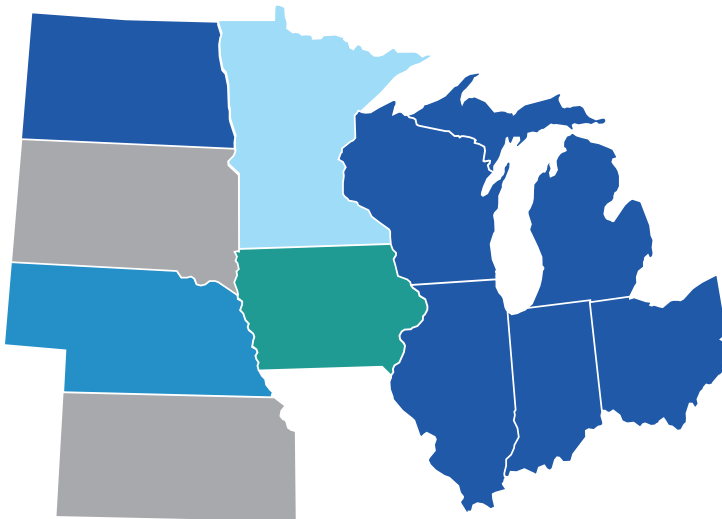


## State child labor standards for workers under age 16: Maximum daily and weekly hours\*



- State standards same as federal standards: 1) maximum of three hours on a school day and 18 hours during a school week; and 2) maximum of eight hours on a non-school day and 40 hours during a non-school week
- State standards same as federal standards for non-school days and weeks but differ for school days/weeks: 1) six hours a school day and 28 hours a week in Iowa and 2) four hours a day and 20 hours a week in South Dakota
- Maximum of eight hours a day and 40 hours a week all year in Kansas and Minnesota and maximum of eight hours a day and 48 hours a week all year in Nebraska (standards apply to both school days/weeks and non-school days/weeks)

## State child labor standards for workers under age 16: Nighttime restrictions\*



- State standards same as or close to same as federal standards: 1) no work from 7 p.m. to 7 a.m. during most of year; and 2) no work from 9 p.m. to 7 a.m. during time of year when school is not in session
- No work from 9 p.m. to 7 a.m. during most of year and 11 p.m. to 7 a.m. from June 1 through Labor Day
- No work from 9 p.m. to 7 a.m. all year round
- State standards only apply to school days: No work later than 10 p.m. before school day
- For under age 14, no work from 8 p.m. to 6 a.m.; for ages 14 and 15, no work from 10 p.m. to 6 a.m. (on non-school days, 14- and 15-year-olds can work beyond 10 p.m. with a special permit)

\* Where a state child labor law is less restrictive than the federal law, the federal law applies. Where a state child labor law is more restrictive than the federal law, the state law applies. Under federal law, children 14 and under cannot be employed in most non-agricultural occupations. Some work is allowed, however. Notable examples include acting, newspaper delivery and babysitting.



## Loosening of Child Labor Laws in Midwest

One legislative trend has been to scale back certain provisions in state child labor laws, in both big and small ways.

In terms of comparatively small changes, Iowa lawmakers passed **SF 2190** in 2022. The law allows employees under 18 to operate pizza dough rollers “that have been constructed with safeguards contained in the basic design so as to prevent fingers, hands or clothing from being caught.” Young workers are still barred from cleaning or repairing the rollers’ machinery.

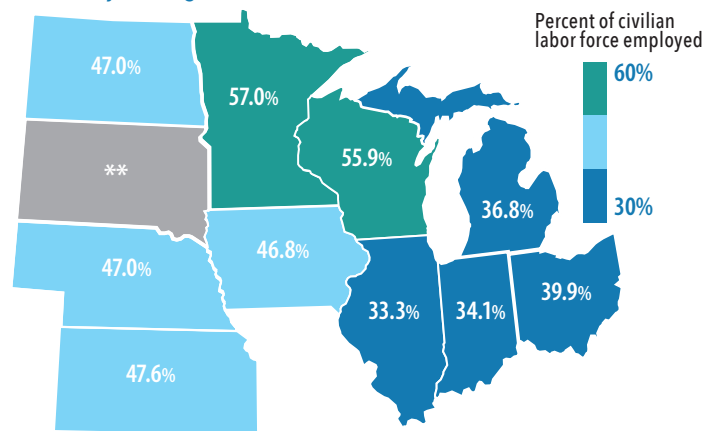
Another recent change, one that affects a larger group of employers and workers, has been to lower the minimum age for serving or selling alcoholic beverages.

As a part of Iowa’s **SF 542**, which became law in 2023, parents or guardians can give written permission allowing their 16- or 17-year-olds to personally handle alcohol under adult supervision. In Indiana (**SB 146** of 2024) and Ohio (**SB 102** of 2021), the minimum age of 19 was dropped to 18. In all three of these states, minors can serve or sell drinks in establishments such as restaurants, hotels and convenience stores. They are still barred from working as bartenders.

In Michigan, individuals as young as 17 have been able to work as bartenders since the enactment of **HB 4232** in 2022.

Beyond changing the rules for a specific job type, some legislatures have considered broader overhauls of their states’ child labor laws. In recent years, for example, bills in Indiana and Iowa captured considerable attention as they were introduced, debated and, ultimately, signed into law.

**% of 16- to 19-year-olds employed in the workforce**  
(monthly averages for 2024)\*



\* Excludes active-duty armed service members and people confined to, or living in, correctional facilities or residential care facilities

\*\* Data for 16- to 19-year-olds is not available. In 2024, the average labor participation rate for 16- to 24-year-olds in South Dakota was 64.5%, compared to a U.S. average of 55.9%

Source: U.S. Bureau of Labor Statistics

## Indiana SB 146 and HB 1093



In Indiana, along with allowing minors to serve and sell alcohol at certain licensed establishments, the final version of **SB 146** of 2024 exempts from the state's child-labor restrictions minors who work as actors or performers, as newspaper carriers, or as evergreen wreath crafters.

The original version of SB 146 was much broader in scope. For example, it would have extended the number of hours that 14- to 16-year-olds can work.

In Indiana, individuals in this age range can only work between the hours of 7 a.m. and 7 p.m. during the school year and between 7 a.m. and 9 p.m. during the summer months. Work shifts also must be limited to a maximum of three hours on a school day and 18 hours during a school week. As initially written, SB 146 would have extended working hours to 9 p.m. on school nights and 11 p.m. during the summer. The bill's original language also would have increased maximum-allowed shift hours: to six hours daily and 28 weekly during the academic year.

Another provision would have authorized the Indiana Department of Workforce Development to grant waivers authorizing individuals between the ages of 16 and 18 to work jobs deemed "hazardous," so long as certain conditions were met – for example, under adult supervision, for limited time periods, and only for those individuals in an apprenticeship or work-based learning program.

In addition, SB 146, as originally introduced, would have provided civil immunity protections to work-based learning providers in the event that a student worker were injured or killed either in transport to or from a job site or while on the job. This immunity would not have extended to instances of gross negligence by the employer. These provisions, however, did not become part of the enacted law.

The final version of Indiana's SB 146 also did not change the law governing the hours that can be worked by individuals younger than 16.

But that same year, Indiana legislators passed a bill (**HB 1093** of 2024) that completely repeals work-hour restrictions for 16-, 17- and 18-year-olds – including on school nights. The law also eliminates work-hour restrictions for minors between the ages of 14 and 16 under certain conditions:

- graduated from high school,
- completed the eighth grade and has been excused from compulsory school attendance,
- has child-support responsibilities,
- is the subject of a school-interrupting court order, or
- has been expelled from school and is not required to attend an alternative education program.

## Iowa SF 542



In 2023, Iowa legislators changed the number of hours young people can work while also granting new liability protections for employers.

After **SF 542** became law, Iowa no longer had state-level restrictions on the number of hours that 16- and 17-year-olds could work. Additionally, Iowa extended allowable evening shifts for workers between the ages of 14 and 16 – to as late as 9 p.m. on school nights and 11 p.m. on summer nights. SF 542 also increased the maximum work shift for this age group to six hours a day during the school year. A minimum 30-minute-long break is required if minors work for five consecutive hours.

SF 542 provides civil liability protections to work-based learning providers in the event that one of their student workers is injured or killed in transport to or from a job site.

Other provisions in SF 542 outline the various allowable professions for younger workers, as well as the types of equipment they can and cannot handle. For workers who are 14 years old, the types of jobs available include retail, cashier, grocery bagging, delivery (by either foot, bicycle or public transport), kitchen preparation and cleaning, laundry services, price marking, car cleaning, oil/gas dispensing (does not include the ability to work in a car mechanic pit or engage in tire inflation) and corn detasseling.

At the age of 15, individuals can engage in the work of loading and unloading goods weighing between 30 to 50 pounds, shelf stocking, light assembly-line work and lifeguarding.

The Iowa statute also lays out the types of work that 14- and 15-year-olds are not permitted to do under any circumstance:

- No work in certain higher-risk jobs such as mining, warehousing, construction and elevated window cleaning.
- No work involving specific types of machines, activities and rooms – for example, the operation of food slicers, the loading and unloading of railroad cars, or being stationed inside of a boiler or engine room.

The Iowa law lists a series of professions and activities not permitted for all workers younger than 18 as well. However, for 16- and 17-year-olds enrolled in a career-and-technical education or work-based-learning program, a waiver can be granted as long as the work is done under adult supervision, after necessary safety training, and with written permission from the child’s parent or guardian.

These jobs include roofing; demolition; metal forming and shearing; brick-and-tile manufacturing; excavation; the operation of band saws, power-driven hoisting apparatuses

and dry-cleaning machinery; and the delivery of goods or messages between the hours of 10 p.m. and 5 a.m.

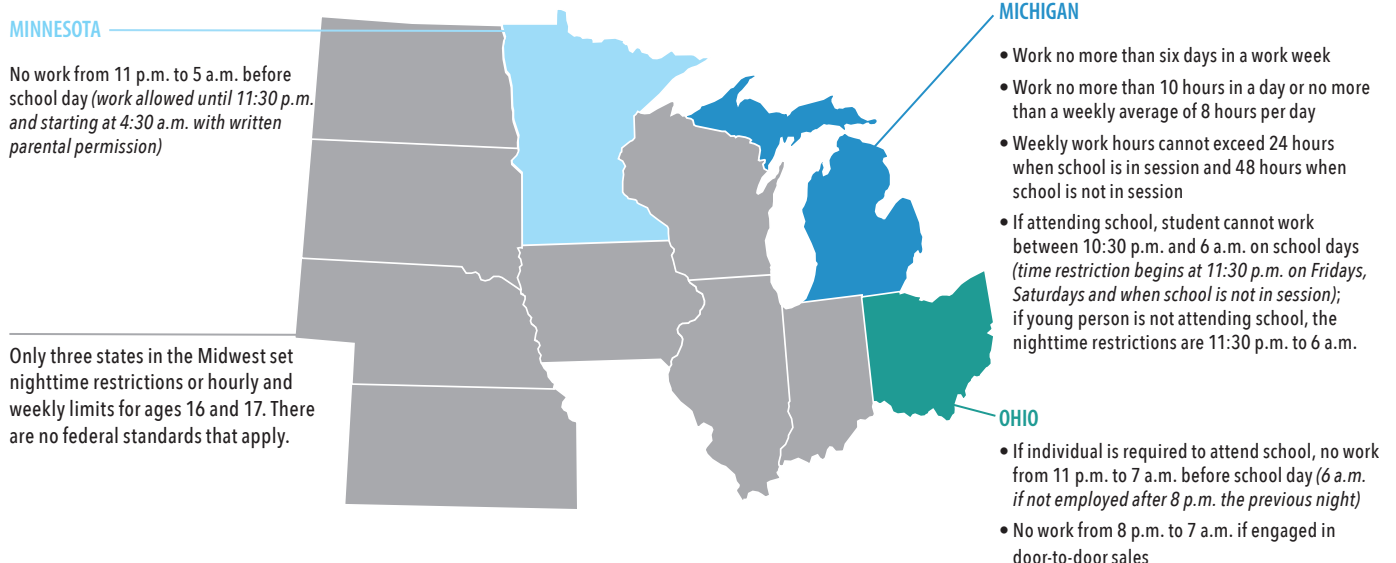
SF 542 stipulates that certain professions or activities can never be performed by a minor, even those that would be part of a career education program. This includes logging and mining; working in a plant that manufactures or stores explosives (exceptions made for light assembly work and fireworks sales); and working in a slaughterhouse or meat-packing plant. Also under the law, young people cannot be employed in jobs that expose them to radioactive or lead fumes or that involve nude/topless dancing.

Earlier versions of the bill did not preclude these professions and extended waivers to workers as young as 14 years old.

#### Aftermath of enactment of Iowa SF 542

When Iowa’s SF 542 took effect, the nighttime hours that a 14- or 15-year-old could work under state law became less restrictive than the limits outlined in the federal Fair Labor Standards Act.

## State child labor standards for ages 16 and 17: Maximum of daily and weekly hours worked and nighttime restrictions



Sources: U.S. Department of Labor, Wage and Hour Division; and Michigan Department of Labor and Economic Opportunity



# 400,000-500,000

Estimated # of 12- to 17-year-olds working in agriculture in the U.S.

Source: Association of Farmworker Opportunity Programs

Over the next year, the U.S. Department of Labor investigated and fined several Iowa businesses for adhering to state as opposed to federal guidelines. According to the Iowa Restaurant Association (which supported SF 542), these fines reached as high as \$180,000.

In July 2024, Gov. Kim Reynolds requested that federal officials reconsider or renegotiate these fines, particularly those impacting small businesses in the state.

“Maximum allowable daily and weekly work hours [in Iowa] for young teens have been above the federal maximum since 1970 without any enforcement issues,” she wrote in a letter to the department.

“More than 25 states currently have state labor laws that are less restrictive than federal law. Those 25 states have not been subjected to the same level of enforcement and excessive fines as Iowa. ... We fully support the enforcement of labor laws against businesses which employ youth in dangerous and harmful work environments.”

“But a teenager working past 7 p.m. on a school night is not oppressive child labor.”

In a September 2025 report, the U.S. Department of Labor’s Office of Inspector General acknowledged the potential for confusion in the business community when state and federal laws differ, especially in the wake of recent legislative changes such as those in Iowa.

“State actions to strengthen or weaken child labor law have led to misunderstandings among employers,” the report’s authors noted.

The department has recommended that every state make clear in its compliance materials and on its website the expectations of employers. Iowa does so with this language:

*“Employers are generally subject to both state child labor laws and the federal child labor provisions of the Fair Labor Standards Act (FLSA). When there are differences between state and federal child labor laws, employers covered by both Iowa law and the FLSA must follow the most protective provisions that apply to their employees.”*

Other states use similar language.

Iowa legislators, meanwhile, also reduced some state penalties related to violations of child labor laws.

Specifically, the joint Administrative Rules Review Committee changed civil penalties against companies that habitually violate work-hour violations by less than 15 minutes. Before the most recent change – which went into effect in February 2025 – the civil penalty for a seventh instance of an hour violation was \$5,000, then went up to \$7,500 for an eighth instance, and \$10,000 for nine or more instances.

Now, the penalty for hour violations that occur six or more times is capped at \$2,500 per instance. For employers who have a teen worker die while on the job while working at a prohibited time, or for working excessive hours, the civil penalty remains capped at \$10,000 per instance.



## Vetoed bills in Wisconsin and Ohio

Changes in child-labor laws also were approved in recent years in two other Midwestern state legislatures, Wisconsin and Ohio, but never became law due to gubernatorial vetoes.

Wisconsin’s **SB 332** of 2022 sought to expand allowable work hours for employees younger than 16 not covered by the FLSA. The other bill, SB 436 of 2024, would have repealed certain work permitting requirements for 14- and 15-year-olds as well as identification card requirements for minors engaged in “street trades” – on-the-street or door-to-door sales or collections.

In his veto message, Gov. Tony Evers wrote, “This bill eliminates a process that ensures parents and guardians have knowledge of employment so they can, in their judgment, determine whether a job may be detrimental to their young worker’s health, safety, social development or academic success.”

In late 2025, Ohio Gov. Mike DeWine vetoed **SB 50**. The bill would have authorized the director of the Ohio Department of Commerce to create a “minor work-hour notification” form. By signing the form, parents and guardians would allow their 14- or 15-year-old child to work until 9 p.m. on a school night. The current cutoff is 7 p.m.

“I believe the current law has served us well and has effectively balanced the importance of 14- and 15-year-old children learning to work with the importance of them having time to study,” Gov. DeWine wrote in his veto message.

# Recent State Enhancements of Protections for Child Workers

While the measures in Iowa and Indiana limited the scope of parts of the two states' child labor laws, they also added new statutory protections.

Iowa's **SF 542** explicitly states that no person under age 14 can be employed in any paid or unpaid job, and it repealed a law allowing migrant children as young as 12 to work during non-school hours. Iowa also now bars registered sex offenders from hiring minors. Indiana's **SB 146**, meanwhile, instituted new bimonthly reporting requirements, including employee names and work locations, for businesses that employ five or more 14- to 18-year-olds. In 2026, however, state lawmakers voted to suspend these reporting requirements and the related statewide database with the passage of **HB 1302**.

In other Midwestern states, new laws have focused mostly or exclusively on strengthening child labor protections.

## NEBRASKA



Under **LB 906**, signed into law in 2024, the penalty in Nebraska for employing a child younger than 16 in an unauthorized position or without retrieving the proper permits was increased to a Class I misdemeanor, which carries with it a potential prison sentence of up to one year and/or \$1,000 fine. Nebraska's commissioner of Labor also gained new subpoena powers to review the documentation of suspected violators.

## MICHIGAN



Michigan's **HB 5594**, signed into law in 2025, calls on the state Department of Labor and Economic Opportunity to take a larger role in overseeing work permits for minors – a duty that has been mostly carried out by individual school districts. Working minors who are younger than 16 will have to be registered with the department, which will then create a statewide database that discloses children's ages, addresses, contact information, parent or guardian names, and any physical limitations.

Work permits also can be revoked if the department learns that a child worker has repeatedly been absent from school or that the work violates federal and/or state law. The law exempts minors from having to register if they are working as an unpaid volunteer for either a tax-exempt organization or for a fair or exhibition, as well as for individuals 13 or older who are working certain jobs on a farm during the summer.

## ILLINOIS



Illinois high schools that participate in "Workplace Readiness Week" must present students with information related to their rights as workers and to workplace safety, as well as their right to unionize (**HB 4417** of 2024). And participating schools will provide students with a list of state-approved apprenticeship programs.

Also in 2024, Illinois legislators passed **SB 3646**, a bill hailed by supporters as an important modernization and upgrade of state-level protections for child workers.

Under the law, employers must have and keep on file for at least three years an employment certificate that a child obtains from his or her school's issuing officer. The officer must determine that the employment is not detrimental "to the minor's health, welfare and education" before approving the application.

Employment certificates may be inspected by the Illinois Department of Labor, school officials and truancy officers without notice. Minors, defined as those younger than 16, must also be supervised on the job by an employee who is at least 21 years old.

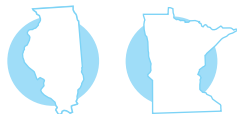
Additionally, the law outlines the various types of work that minors cannot do:

- Specific professions such as construction, armed security, amusement ride operation, laundry services, recreational cannabis sales and energy generation.
- Specific work environments such as jobs with exposure to radioactive, lead or acidic substances.

Workers aged 14 and 15 are allowed to work retail jobs, but cannot personally handle products that they themselves cannot purchase (for example, alcohol or cigarettes).

In addition to establishing new labor protections, however, the Illinois law exempts various jobs and ages from child labor restrictions. This includes children as young as 10 working on their family farm as well as young people engaged in distributing magazines and newspapers, babysitting, golf caddying (if he or she is at least 13 years old), assisting with or officiating a youth sport (if 12 years old), or enrolled in a school-directed work-based-learning program (if 14 years old). Work in these jobs cannot occur during regular school hours. Additionally, for 12- and 13-year-olds employed as youth sports officials, their parent or guardian (or an adult designated by the parent or guardian) must be present. These younger sports officials also are limited in the number of hours they can work.

### New safeguards in Illinois and Minnesota for young 'vloggers'



Illinois' SB 3646 also includes language to protect the earnings of child actors as well as "vloggers." For actors younger than 16, a trust account must be established and include at least 15 percent of gross earnings. The child is designated as the sole beneficiary upon reaching age 18. (The rules do not apply to child actors who primarily work as extras.) Theater actors are limited to performing in up to two shows a day or eight shows a week (unless it's a holiday weekend, in which case the maximum number of performances can be increased to nine a week).

The requirements for the trust account also apply to children under 16 who are prominently featured in the vlogs of adult influencers. SB 3646 stipulates different guidelines on the percentage of money that a regularly featured minor is entitled to receive.

## Minimum wage, per hour, for youth workers (2026)

STATE	Youth Minimum Wage	Minimum Wage
ILLINOIS	\$13.00*	\$15.00**
INDIANA	n/a	\$7.25‡
IOWA	n/a	\$7.25
KANSAS	n/a	\$7.25
MICHIGAN	\$11.67 for 16- and 17-year-olds	\$13.73‡
MINNESOTA	n/a	\$11.41
NEBRASKA	\$13.50 for 14- and 15-year-olds	\$15.00*
NORTH DAKOTA	n/a	\$7.25
OHIO	\$7.25 for workers under age 16	\$11.00°
SOUTH DAKOTA	n/a	\$11.85
WISCONSIN	n/a	\$7.25

Training wages also often apply to younger workers in their first 90 calendar days of work. Minus a separate state law, the federal training wage applies: \$4.25 per hour for workers under age 20. Some states set their own training wages for younger workers – for example, \$9.31 in Minnesota for workers under age 20, \$13.50 for 16- to 19-year-olds in Nebraska, and \$5.90 for workers under 20 in Wisconsin.

\* Lower minimum wage only applies for individuals who work less than 650 hours per calendar year

\*\* Applicable to employers of 4 or more people

‡ Applicable to employers of 2 or more people

° Applicable to employers with annual gross receipts of \$405,000 or more

Source: U.S. Department of Labor, the Economic Policy Institute, and CSG Midwest research

In Minnesota, in addition to establishing record-keeping and trust fund requirements concerning minors prominently featured in an adult's online content creation, **HF 3488** (enacted in 2024) sets a minimum age of 14 for when individuals can have their likeness regularly appear in vlogs.

Content that habitually features minors younger than 14 (excluding content shot in a public setting, such as a concert or sporting event) must allocate 100 percent of content profits to the minor or minors. In addition, HF 3488 stipulates that content depicting the likeness of a child must be removed from online platforms if a request is made by the featured minor. These requests can still be made into adulthood.



# Work permits, reporting and enforcement

The Economic Policy Institute identifies a series of steps that policymakers can take to protect youth workers.

One, review and potentially revise your state’s statutory language related to minimum working ages as well as hazardous occupations and working conditions. Second, create a work-permitting system for minors, if the state doesn’t have one, or modernize and strengthen it – like Illinois did under **SB 3646**. Third, ensure civil and criminal penalties are strong enough while also strengthening your state’s enforcement capacity. Fourth, improve employer training and include statutory whistleblower protections.

Work permits and other reporting requirements are designed to increase employer accountability and aid in state-level enforcement of labor laws.

In a 2024 study, the institute notes how this worked in the state of Maine, where labor officials reported the denial of “about 200 of the 4,700 work permit applications received, because they were for a hazardous occupation prohibited for minors.”

University of Maryland researchers found that state-mandated employment certificates correlate with fewer violations.

“On average, states with such mandates see 13.3 percent fewer child labor violation cases per million population and 31.8 percent fewer minors violated per million population,” they noted in the 2024 study, “State Mandated Employment Certificate for Minors Reduces Child Labor Violations in the U.S.”

## States with youth work permit requirements

STATE	For minors of age indicated	Issued by
ILLINOIS	Under 16	School
INDIANA*	n/a	n/a
IOWA	n/a	n/a
KANSAS	Under 16 and not enrolled in school	School
MICHIGAN ‡	Under 18	State labor department
MINNESOTA	Under 16 during school hours	School
NEBRASKA	Under 16	School
NORTH DAKOTA	Under 16	State labor department
OHIO	Under 16 and 16-17 during school term	School
SOUTH DAKOTA	n/a	n/a
WISCONSIN <sup>§</sup>	Under 16	State labor department and school

\* Following 2021, previous work permits were replaced with an employer registration system whereby required employers must register all minors they employ using a database maintained by the Indiana Department of Labor.

‡ A work permit is not required for a minor 16 or older who has completed the requirements for high school graduation or has obtained a high school equivalency certificate and provided copy of certification to the employer. A work permit is not required for a 17-year-old minor who has passed the general education development (GED) test and provided copy of certification to the employer. Certification is now issued by the Michigan Department of Education. Following the signing of HB 5594 in 2025, workers younger than 16 must obtain a permit from the Michigan Department of Labor and Economic Opportunity.

§ Certificates are issued by volunteer permit officers who are representatives of the Department of Workforce Development. Many of the permit officers are school officials, but other public employees such as municipal and county employees and court officials are also included.

Source: U.S. Department of Labor, Wage and Hour Division and CSG Midwest research

FISCAL YEAR	# of minors employed in violation	# Child labor law violations
2019	3,073	3,748
2020	3,394	4,181
2021	2,817	3,524
2022	3,876	4,859
2023	5,766	7,624

Source: "Advisory Report: Review of WHD efforts to address child labor law violation challenges," U.S. Department of Labor Office of Inspector General, September 2025

In the state of Washington, employers must first obtain a special endorsement to their company’s business license, called a “minor work permit,” in order to hire young teens. A 2025 law (**HB 1644**) added new civil penalties on businesses that fail to obtain these permits (and hire young workers) or that violate child labor restrictions in other ways.

The penalties include a minimum of \$100 for each time a company fails to obtain a minor work permit and a minimum of \$71,000 for any violation resulting in the death of a minor who was working at an unauthorized time or in an unauthorized capacity. Penalty amounts will be adjusted for inflation.

Certain minor work permits in Washington also will now require health and safety inspections, and companies may be prohibited from hiring minors based on past violations of the law.

### MIGRANT CHILDREN AND LABOR TRAFFICKING

One particularly vulnerable population to labor abuse and exploitation is unaccompanied migrant children.

The 2024 University of Maryland study examined federal data between 2015 and 2020 and found “positive correlation between the release of unaccompanied minors and the incidence of child labor violations.”

“A 1 percentage point increase in the number of unaccompanied children in a [state per year] leads to a 9.2 percent increase in that state’s child labor violation cases,” the study notes.

In terms of state-level responses, in addition to reporting mandates that require employers to habitually document the names and job locations of their young workers, other options include making government services and labor-complaint hotlines more accessible to individuals with limited English proficiency, as well as requiring state agency training to spot potential labor trafficking.

In 2023, lawmakers in Michigan passed **SB 382** and **HB 4720**, two measures that require every state agency to develop foreign-language access plans related to public services. These plans must:

- Provide oral language services both in person and via the phone.
- Translate vital documents into languages that more than 3 percent of the overall serviced population speaks.
- Designate a liaison to coordinate with the Department of Labor and Economic Opportunity’s Office of Global Michigan in order to facilitate staff trainings and conduct community outreach campaigns that inform the public of available language services.

Under Illinois’ **SB 2323**, which became law in 2025, the Illinois Department of Labor must develop training sessions on child and human trafficking. This training is for state health inspectors, department investigators, and others who work with industries at high risk of labor trafficking – including restaurants, hotels, construction and agriculture. The department also will create educational materials explaining youth workers’ rights and indicators of child labor trafficking. They will be shared on the department’s website and with regional offices of education.



## Conclusion

Even as some states have sought a loosening of some aspects of their child labor laws, the recent legislative activity points to some consensus on the value of state-level oversight – for example, rules on adult supervision, workplace safety and parental input, as well as bans on working at jobs deemed highly dangerous or indecent.

Adequate enforcement also is a shared goal.

The U.S. Department of Labor’s inspector general noted in a 2025 report that as of November 2024, the department’s Wage and Hour Division had memorandums of understanding with 46 states and territories allowing for collaborative “data sharing, referrals, coordinated enforcement, joint outreach and compliance assistance” related to child labor protections.

The list of states with these MOUs includes Illinois, Indiana, Iowa, Kansas, Michigan, Minnesota, Nebraska and Ohio.

According to a separate Department of Labor report issued to the U.S. Congress, during fiscal years 2023 and 2024, 9,822 young workers were employed or working in conditions that violated the federal Fair Labor Standards Act. This figure includes about 867 young people working in hazardous occupations. At the time the report was published, the department reported having more than 1,000 open investigations into potential child labor violations.

This report included this summary of investigations from around the country:

*“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.”*

Opinions may vary on exactly what hours and types of jobs a young person should be able to work while still in school. But there is widespread agreement on ensuring proper oversight and safety, as well as the belief that youth employment works best when it provides individuals with transferable skills and work experiences.



## MIDWEST

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