



Employee Recruitment Challenges Are Resulting in Consideration of Minors: Here's What You Need to Know

By: Jenny Porrevecchio, Senior Loss Control Consultant at IRMA

IRMA has received several inquiries from members who are struggling to fill positions, asking our advice regarding hiring people under 18. In response, we have updated our [Employment of Minors Best Practice Guidelines](#), which helps departments plan when opening employment to minors. There are many things that younger employees cannot do. Below is a brief summary of restrictions that our Senior Loss Control Rep Jenny Porrevecchio has curated in response.

The Department of Labor sets standards for child labor including hours worked and prohibited jobs. This [webpage](#) summarizes well those regulations as they apply to 16 and 17 year old's. The full code can be found [here](#).

Minors who are at least 17 years of age may drive automobiles and trucks on public roadways when all the following criteria are met:

- (1) The automobile or truck does not exceed 6,000 pounds gross vehicle weight, and the vehicle is equipped with a seat belt or similar restraining device for the driver and for any passengers and the employer has instructed the employee that such belts or other devices must be used;
- (2) The driving is restricted to daylight hours;
- (3) The minor holds a State license valid for the type of driving involved in the job performed and has no records of any moving violations at the time of hire;
- (4) The minor has successfully completed a State-approved driver education course;
- (5) The driving does not involve: the towing of vehicles; route deliveries or route sales; the transportation for hire of property, goods, or passengers; urgent, time-sensitive deliveries; or the transporting at any one time of more than three passengers, including the employees of the employer;
- (6) The driving performed by the minor does not involve more than two trips away from the primary place of employment in any single day for the purpose of delivering goods of the minor's employer to a customer (except urgent, time-sensitive deliveries which are completely banned in [paragraph \(b\)\(5\)](#) of this section);
- (7) The driving performed by the minor does not involve more than two trips away from the primary place of employment in any single day for the purpose of transporting passengers (other than the employees of the employer);
- (8) The driving takes place within a thirty (30) mile radius of the minor's place of employment; and,
- (9) *The driving is only occasional and incidental to the employee's employment. ([Clarification:](#) This means that the youth may spend no more than one-third of his or her workday and no more than 20 percent of his or her work time in any workweek driving.)*

Employees must be 18 to perform any of the following hazardous occupations:

- Manufacturing and storing of explosives.
- Driving a motor vehicle and being an outside helper on a motor vehicle.
- Coal mining.
- Forest fire fighting and fire prevention, timber tract management, forestry services, logging, and sawmill occupations.
- Power-driven woodworking machines.
- Exposure to radioactive substances.
- Power-driven hoisting apparatus.
- Power-driven metal-forming, punching, and shearing machines.
- Mining, other than coal mining.
- Meat and poultry packing or processing (including the use of power-driven meat slicing machines).
- Power-driven bakery machines.
- Balers, compactors, and paper-products machines.
- Manufacturing brick, tile, and related products.
- Power-driven circular saws, band saws, guillotine shears, chain saws, reciprocating saws, woodchippers, and abrasive cutting discs.
- Wrecking, demolition, and shipbreaking operations.
- Roofing operations and all work on or about a roof.
- Excavation operations.

Any member who employs 17-year-olds to operate riding mowers, are strongly recommended to implement a thorough safety training program and supervisory system. Along with developing training based on the owner's manual of your equipment, here are a few recommended resources:

[IRMA's Self-Paced Training](#)

[OSHA's Riding Mower Safety Resource](#)

As always, we are available to members who have additional questions.