High School Employees in Manufacturing Facilities: Busting the Myths

Manufacturing companies are often slow to hire student workers. When asked why, companies often refer to perceived insurance restrictions or undefined legal ramifications. But the simple truth is this: **There are clear laws explaining how it can be done, and getting it done is easy.**

Below is a list of common myths followed by the actual state of affairs.

MYTH: STUDENTS UNDER 18 YEARS OLD AREN'T ALLOWED TO WORK IN MANUFACTURING FACILITIES

Students can complete meaningful work that benefits both the student's learning objectives and the host company. In fact, the "Child Labor Provisions for Nonagricultural Occupations Under the Fair Labor Standards Act," published by the US Department of Labor, specifically allows students to operate a number of machine tools with proper training[1]. The full document is found in Appendix G on pages 16 and 17 of the federal document. A list of those machine tools follows.

Milling Function Machines

- ✓ Horizontal Milling Machines
- ✓ Vertical Milling Machines
- ✓ Universal Milling Machines
- ✓ Planer-type Milling Machines
- ✓ Gear Hobbing Machines
- ✓ Profilers
- ✓ Routers

Turning Function Machines

- ✓ Engine Lathes
- ✓ Turret Lathes
- ✓ Hollow Spindle Lathes
- ✓ Automatic Lathes
- ✓ Automatic Screw Machines

[1]U.S. Department of Labor Wage and Hour Division. *Child Labor Provisions for Nonagricultural Occupations Under the Fair Labor Standards Act*. Child Labor Bulletin 101, WH-1330. Revised February 2013.

Work-Based Learning in Action: Best Practice

It is common for companies to develop short-term projects for students to complete. These projects should be related to manufacturing (avoid copying and filing tasks) and allow the student to apply previous knowledge while learning on the job. Some possible examples of projects are listed below:

- » Safety Audits
- » MSDS Review
- » Quality Inspections
- » Inventory Cycle Counting
- » CAD Design
- » Receiving
- » Picking
- » Packing
- » 5S Implementation
- » Kaizan Event Participation
- » Process Review
- » Freight Cost Analysis
- » Quoting
- » ERP System Management
- » WMS/TMS Management
- » Planning & Scheduling
- » Physical Inventory Counts
- » Fixed Asset Counting

Planing Function Machines

- ✓ Planers
- ✓ Shapers
- ✓ Slotters
- ✓ Broaches
- ✓ Keycasters
- ✓ Hack Saws

Grinding Function Machines

- ✓ Grinders
- ✓ Abrasive Wheels
- ✓ Abrasive Belts
- ✓ Abrasive Disks
- ✓ Abrasive Points
- ✓ Polishing Wheels
- ✓ Buffing Wheels
- ✓ Stroppers
- ✓ Lapping Machines

Boring Function Machines

- ✓ Vertical Boring Mills
- ✓ Horizontal Boring Mills
- ✓ Jig Borers
- ✓ Pedestal Drills
- ✓ Radial Drills
- ✓ Gang Drills
- ✓ Upright Drills
- ✓ Drill Presses
- ✓ Centering Machines
- ✓ Reamers
- ✓ Honers

Of course, there are restrictions to the type of work that students can complete in manufacturing facilities. For instance, unless they are enrolled in a U.S. Dept. of Labor Registered Apprenticeship or state-recognized CTE program, students are prohibited from setting-up, adjusting, repairing, oiling, cleaning, operating, or helping to operate the following machines, including those with automatic feed and ejection[2]:

- ❖ All rolling machines, such as beading, straightening, corrugating, flanging, or bending rolls; and hot or cold rolling mills.
- ❖ All pressing or punching machines, such as punch presses except those provided with full automatic feed and ejection and with a fixed barrier guard to prevent the hands or fingers of the operator from entering the areas between the dies; power presses; and plate punches.
- ❖ All bending machines, such as apron brakes and press brakes.
- ❖ All hammering machines, such as drop hammers and power hammers.
- ❖ All shearing machines, such as guillotine or squaring shears; alligator shears; and rotary shears.

NOTE: Forklifts, Overhead Cranes, and other Hoist Apparatus are Off Limits!

All students—even those enrolled in a Registered Apprenticeship or state-recognized CTE program—are prohibited from setting-up, adjusting, repairing, oiling, cleaning, operating, helping to operate or even riding on power-driven hoist apparatus, such as forklifts, loaders, cranes, backhoes, hoists, and manlifts. Students are able to work in facilities that use these machines, but they cannot operate, ride on, operate, assist in operating, or service them.

[2]U.S. Department of Labor Wage and Hour Division. *Child Labor Provisions for Nonagricultural Occupations Under the Fair Labor Standards Act*. Child Labor Bulletin 101, WH-1330. Revised February 2013.

MYTH: MY INSURANCE POLICIES DON'T ALLOW ANYONE UNDER 18 ON THE PRODUCTION FLOOR

When students are hired as part-time employees of your company and compensated for their time, they are most likely covered under your company's current insurance policy. In fact, according to interviews conducted with members who regularly host high-school-age interns, this is the rule, not the exception. They are normally covered in the same manner as any regular employee in the same class code and wage group. To be sure that your specifi c coverage works this way, you will want to confi rm with your insurance provider prior to bringing a work-based-learning or school-to-registered-apprenticeship student onboard.

MYTH: KIDS CAN'T LEARN ANYTHING HERE WHILE STILL IN HIGH SCHOOL

Even a six-week work-based learning opportunity allows for students to receive a broad experience in a manufacturing facility. As a result, the core competencies to be developed through such an experience are based on career development and work skills. Below is a basic list of competencies that can be developed through a work-based learning program serving high school students:

- Basic manufacturing processes
- Overview of the supply chain
- Structure and adaptability in the workplace
- Lean principles
- Communication
- Professionalism
- Abiding by a code of conduct/rule following in the workplace
- Problem solving
- How to set and achieve goals
- Attention to detail
- Career path awareness
- Confidence and courage
- Business presentation skills
- IT systems

Work-Based Learning in Action: Best Practice

At the end of their experience, student interns at Cummins are required to present what they've learned to Cummins team members. This not only helps the students develop important presentation skills, but also allows Cummins to reflect on the student internship experience and ensure that student projects and work are high quality.

Through school-to-registered apprenticeships like the JAC^3 early/middle college and state certified CTE work-based learning programs that span a student's entire 11th and 12th grade years, even more can be accomplished.

MYTH: STUDENTS CAN ONLY WORK FOR A FEW HOURS A DAY.

Students 16 years or older in Michigan can work 8 hours per day for up to 24 hours per week during school weeks and up to 48 hours per week during non-school weeks (including holidays and all summer) between the hours of 6:00 am and 10:30 pm (up to 11:30 pm on non-school week Fridays & Saturdays. Additionally, employers must:

- Provide a documented 30 minute break for students who work for a continuous 5 hour period
- Provide no more that 6 days of employment in any given week for minors 16 years of age or older

MYTH: GETTING A WORK PERMIT IS DIFFICULT

Employees who are under the age of 18 must have a valid work permit. Most of the work to get the permit actually rests with the student and the student's school. All that a company must do is:

1. Complete Section II of the “Combined Offer of Employment and Work Permit/Age Certificate" CA-6 from the State of Michigan and give it to the student at the time an offer is made.
    - The student will take the form to their school and submit it.
    - The student will receive the work permit from their school.
2. Collect the work permit from the student and keep it on file.

For companies that participate in the JAC[3] program, the Jackson Area Career Center handles the entire process!

MYTH: PARENTAL SIGNATURES ARE A BARRIER TO EMPLOYMENT

Before your selected candidates begin work, they may need to complete company-specific paperwork and/or testing. Rfgq k_w glajsbc `_aiepmslb afcaiq* bpse+qapcclgle _lb amknjcrgml md npc+cknjmwkclr n_ncpumpi* glajsbgle lml+bgqajmqspc _epcckclrq* ambc md amlbsar gldmpk_rgml* cra, When hiring minors, parental signatures are often needed, but this issue can be c_qgjw addressed.

Some companies find this process very manageable and handle it in-house. Other companies use the services of a temp agency or rfcgp jma_j Kgafge_l Umpiq _eclaw. For cmkn_lgcq n_prgagn_rgle gl rfc H?A[1] c_pjw-kgbbjc amjjcec npmep_k, rfc H_aiqml ?pc_ A_pccp Aclrcp takes care of parental sign offs,

MYTH: I’LL HAVE TO CREATE A NEW CODE OF CONDUCT TO DEAL WITH THESE STUDENTS

?q employees of your company* qrsbclrq should be held to the same conduct standards as all other employees. As a result, most companies will find that using their existing codes of conduct and employee on-boarding is appropriate for umpi+`_qcb qrsbclr jc_plcpq.