

Child Labor Laws Manager Quick Reference Chart

Jason's Deli / Deli Management, Inc.

Manager Compliance Reference

Current as of September 2, 2026

Document owner: Human Resources

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Intended use: QR-code reference linked from the Employee Handbook

Purpose and Important Disclaimer

This document is a **manager quick reference**, not a complete statement of the law and not a substitute for review by Human Resources or legal counsel.

Child labor requirements may be imposed by **federal, state, and local law**, as well as by school districts and work-based learning programs. When two or more requirements apply, managers must follow the rule that provides the **greatest protection to the minor**.

Managers must:

- Follow the most protective applicable federal, state, or local requirement.
- Obtain all required permits, certificates, and authorizations **before the minor begins work**.
- Never rely solely on a minor's or parent's description of applicable requirements.
- Contact Human Resources before hiring, scheduling, or assigning duties to a minor if any requirement is unclear.
- Follow any Company policy that is more protective than the law.

Child labor laws change. Human Resources should review and update this reference periodically. The U.S. Department of Labor expressly cautions that some state provisions are less restrictive than the federal Fair Labor Standards Act; where that occurs, the stricter federal requirement controls. ([dol.gov](https://www.dol.gov))

Universal Federal FLSA Floor for Restaurants

The following federal requirements apply to FLSA-covered restaurant employment. A more protective state or local rule must also be followed. ([dol.gov](https://www.dol.gov))

Minimum Ages and Scheduling Rules

Age	Federal baseline
Under 14	Generally may not be employed in nonagricultural restaurant work. Narrow exemptions exist, but managers must not use an exemption without advance written approval from Human Resources.
14–15	May work only outside school hours, in permitted nonmanufacturing and nonhazardous duties, and within the federal limits below.
16–17	No federal daily or weekly hour cap, but state hour and nightwork limits may apply. Employees under 18 may not perform federally declared hazardous occupations.
18 and older	No longer subject to the federal child labor provisions, although other employment laws and Company safety policies continue to apply.

Federal Hours for Ages 14–15

Employees who are 14 or 15 may work:

- Only **outside school hours**;
- No more than **3 hours on a school day**, including Friday;
- No more than **8 hours on a nonschool day**;
- No more than **18 hours in a school week**;
- No more than **40 hours in a nonschool week**;
- Only between **7:00 a.m. and 7:00 p.m.**; and
- Until **9:00 p.m. from June 1 through Labor Day**.

For this purpose, the school calendar applicable to the minor must be confirmed. Managers must not assume that a holiday, teacher workday, remote-learning day, or shortened school day is a nonschool day.

Federal Restaurant Duties for Ages 14–15

Employees who are 14 or 15 may generally perform permitted duties such as:

- Cashiering;
- Table service and bussing;
- General cleanup using permitted equipment;
- Dishwashing;
- Operating toasters, warming lamps, coffee grinders, and milkshake blenders;
- Preparing food and beverages using equipment permitted by federal law;
- Limited cooking on certain electric or gas grills that does not involve an open flame;
- Using deep fryers only when the equipment has and uses an automatic device that raises and lowers the basket;
- Dispensing food from steam tables or cafeteria lines; and
- Momentarily entering a freezer to retrieve an item.

Employees who are 14 or 15 may not:

- Bake;
- Cook over an open flame;
- Use prohibited broilers, rotisseries, pressure cookers, fryolators, high-speed ovens, or similar restricted equipment;
- Operate, clean, set up, adjust, repair, or oil power-driven food slicers, grinders, processors, or mixers;
- Operate power-driven lawn mowers or cutters;
- Load or unload goods from trucks or conveyors;
- Perform regular work in freezers or meat coolers;
- Handle cooking surfaces or cooking oil above federally permitted temperatures; or
- Perform any occupation prohibited for employees under 18.

These lists are not exhaustive. A task is not authorized merely because it does not appear on the prohibited list. (dol.gov)

Federal Hazardous-Occupation Rules for Employees Under 18

Employees under 18 generally may not operate or clean:

- Power-driven meat or poultry processing machines;
- Meat slicers, saws, grinders, choppers, or patty-forming machines;
- Certain commercial mixers and power-driven bakery machines;
- Power-driven balers or compactors, except for narrowly defined loading activity where every legal condition is met;
- Certain power-driven cutting, woodworking, hoisting, or metal-forming equipment; or
- Any other equipment or occupation declared hazardous by the U.S. Department of Labor.

Motor-vehicle driving on public roads is prohibited for employees under 17 and is allowed for certain 17-year-olds only under an extremely limited federal exception. Company managers must not rely on that exception without advance written HR approval. (dol.gov)

Manager rule of thumb: Never assign a minor to operate or clean slicers, grinders, compactors, balers, or other power-driven cutting or mixing equipment unless Human Resources has expressly approved the specific task and equipment in writing.

Required Manager Workflow Before Scheduling a Minor

Complete every step before the minor begins work or receives a schedule.

- **Confirm age** using reliable proof-of-age documentation.
- **Confirm school status**, including enrollment, graduation status, compulsory-attendance status, and the applicable school calendar.
- **Confirm work authorization**, including any work permit, employment certificate, age certificate, parental authorization, or school authorization.
- **Confirm scheduling limits** for the minor's age, school status, school day, school week, and time of year.
- **Confirm nightwork limits**, including earlier limits before school days.
- **Confirm meal and rest-period requirements** applicable specifically to minors.
- **Identify and block prohibited tasks and equipment** in scheduling, position assignments, training records, and manager notes.
- **Configure POS and timekeeping controls** to flag maximum hours, late shifts, missed breaks, and other minor restrictions.
- **Tell every supervising manager** that the employee is a minor and explain the applicable restrictions.
- **Keep required records**, including proof of age, certificates, permits, schedules, time records, break records, and authorizations.
- **Contact Human Resources** before proceeding if any requirement is uncertain.

Federal law does not itself require a general work permit, but many states require permits, certificates, school involvement, or employer registration. (dol.gov)

State-by-State Manager Chart

How to Use This Chart

- **Federal floor** means the federal rules above apply unless state or local law is more protective.
- A state authorization requirement may depend on age, school enrollment, graduation, or the time of year.
- "Confirm with HR" means the manager must obtain an answer **before** the minor works the affected shift or duty.
- Meal and rest-period requirements can change independently of child labor scheduling laws.
- This chart does not authorize alcohol-related work, delivery driving, or hazardous equipment.

State	Minimum Age / Work Authorization	14–15 Scheduling Limits / Nightwork	16–17 Scheduling Limits / Nightwork	Minor Break Rules / Meal Periods	Restaurant Task / Equipment Restrictions	Manager Action Items
Alabama	Generally 14 for covered restaurant work. Alabama child-labor certificate and eligibility documentation requirements apply.	Generally 3/18 during school weeks and 8/40/6 during nonschool periods. Federal 7:00 p.m./9:00 p.m. limits apply.	An enrolled minor generally may not work between 10:00 p.m. before a school day and 5:00 a.m.; protections may extend beyond age 17 in certain circumstances.	Minor-specific break requirements may apply, particularly to younger minors. Confirm before scheduling.	Federal hazardous-occupation rules apply; state restrictions may add requirements.	Follow Alabama’s certificate process; verify school enrollment and six-day limit; confirm breaks with HR.
Arizona	Generally 14. Arizona generally does not issue a broad work permit, but proof of age must be maintained.	State law may allow later work in some circumstances, but the federal 7:00 p.m./9:00 p.m. limit controls for covered 14–15-year-olds. Special restrictions apply to door-to-door work and deliveries.	No general federal hour cap; confirm state restrictions and school status.	Confirm applicable Company and state break requirements.	Federal hazardous-duty rules apply. Delivery and door-to-door assignments require special review.	Do not use Arizona’s later state nightwork window for covered 14–15-year-olds. No delivery assignment without HR approval.
Arkansas	Generally 14. Arkansas requirements have changed; verify whether a Youth Employment Certificate, age documentation, or other authorization is currently required.	State standards include daily, weekly, six-day, and nightwork restrictions; the federal 3/18 and 8/40 limits remain controlling where stricter.	Special limits apply to 16-year-olds, including restrictions on consecutive hours and nightwork before school days.	Confirm current minor break rules.	Federal hazardous-occupation rules apply; confirm current Arkansas task restrictions.	Obtain current HR instructions before hiring; separately verify rules for age 16 and school-night work.
Mississippi	Generally 14 for covered restaurant work. Maintain proof of age and confirm any local or school requirement.	Federal 3/18, 8/40, and 7:00 p.m./9:00 p.m. rules generally provide the controlling restaurant standard.	No federal hour cap; hazardous-duty prohibitions remain. Confirm local or school restrictions.	No general minor rule should be assumed; follow Company policy and confirm with HR.	Federal hazardous-occupation rules control restaurant equipment and duties.	Apply the federal floor and maintain proof of age. Ask HR about local, school, or role-specific requirements.
Florida	Generally 14. Proof-of-age and school-status documentation requirements apply; verify available exemptions carefully.	Detailed school-day, school-week, six-day, and nightwork rules apply. Federal law controls whenever stricter, including the federal 18-hour school-week ceiling.	State limits apply during school weeks and before school days, including daily/weekly and late-night restrictions.	Florida has minor-specific break requirements. Confirm the required break interval and document compliance.	Federal and Florida prohibited-occupation rules apply.	Review the Florida state chart for every minor; configure schedule and break alerts; do not rely on an exemption without HR approval.

State	Minimum Age / Work Authorization	14–15 Scheduling Limits / Nightwork	16–17 Scheduling Limits / Nightwork	Minor Break Rules / Meal Periods	Restaurant Task / Equipment Restrictions	Manager Action Items
Georgia	Employment certificates generally apply to minors, particularly those under 16. Confirm school-issued documentation before work begins.	Georgia may allow more school-week hours or later nightwork than federal law; the stricter federal 3/18 and 7:00 p.m./9:00 p.m. limits control.	Confirm school-status and any applicable state restrictions.	Follow Company policy and confirm any applicable minor-specific requirement.	Federal hazardous-duty rules apply.	Obtain the required certificate and proof of age. Apply federal limits where Georgia law is less protective.
South Carolina	Generally 14. Confirm whether proof of age or other documentation is required.	Federal 3/18, 8/40, and 7:00 p.m./9:00 p.m. rules generally control covered restaurant employment.	No general federal hour cap; verify state or school-related limitations.	Follow Company policy and confirm state requirements.	Federal hazardous-occupation rules generally provide the principal restaurant restrictions.	Use the federal floor; verify current state restrictions and retain proof of age.
North Carolina	A Youth Employment Certificate is generally required before a minor begins work.	Federal scheduling limits apply to covered 14–15-year-olds. Confirm whether North Carolina imposes additional school-day conditions.	Confirm any state nightwork or school-status restrictions.	A minor under 16 generally receives special meal-break protection. Confirm timing with HR before scheduling.	Federal hazardous-occupation rules and North Carolina youth-employment restrictions apply.	Obtain the Youth Employment Certificate before the first shift; program required breaks and federal hour limits.
Tennessee	Generally 14. Maintain proof of age and verify any required documentation.	Federal 3/18, 8/40, and 7:00 p.m./9:00 p.m. rules apply.	Tennessee imposes nightwork restrictions before school days; limited later work may depend on parental permission and other conditions.	Tennessee has a minor-specific break requirement for qualifying shifts.	Federal hazardous-occupation rules apply, plus any state prohibited-occupation rules.	Obtain required parental documentation before relying on any later-hours provision; schedule and record required breaks.
Kentucky	Generally 14. Confirm proof-of-age and any school authorization.	Federal 3/18, 8/40, and 7:00 p.m./9:00 p.m. limits apply.	Kentucky restricts school-week hours and nightwork for 16–17-year-olds. Any expanded hours may require parental permission and academic conditions.	Kentucky provides meal and rest protections for minors. Confirm required timing and frequency.	Federal hazardous-duty restrictions apply.	Obtain HR approval before using any parental-permission exception; configure both meal and rest breaks.

State	Minimum Age / Work Authorization	14–15 Scheduling Limits / Nightwork	16–17 Scheduling Limits / Nightwork	Minor Break Rules / Meal Periods	Restaurant Task / Equipment Restrictions	Manager Action Items
Virginia	Employment certificates generally are required for employees ages 14–15.	State and federal hour and nightwork limits apply; follow the stricter rule.	Confirm school-status and nightwork restrictions.	Virginia requires a minor meal period in covered circumstances, particularly for younger minors.	Federal hazardous-occupation rules and Virginia prohibited-duty rules apply.	Obtain the employment certificate before work; schedule and record required breaks; verify school calendar.
Maryland	A Maryland work permit generally is required for a minor and is specific to the employment.	Detailed hour and nightwork limitations apply. Use the federal limit whenever it is stricter.	Maryland regulates hours and may require a minimum period free from combined school and work activities.	Maryland has a minor-specific break requirement.	Federal and Maryland hazardous/prohibited-occupation rules apply.	Obtain the permit before the first shift; confirm daily combined school/work restrictions and program break alerts.
Pennsylvania	Work permits generally are required for minors. Proof-of-age and school documentation may be necessary.	Detailed daily, weekly, six-day, and nightwork limits apply. Federal law controls where more protective.	Pennsylvania limits school-week and nonschool-week hours and restricts nightwork for minors attending school.	Pennsylvania has a minor meal/rest requirement.	Federal and Pennsylvania prohibited-occupation rules apply.	Obtain the permit; review the Pennsylvania schedule chart before every material schedule change; document meal periods.
Ohio	Work permits generally are required for minors during periods covered by state law; school and summer procedures may differ.	Federal limits apply, together with any stricter Ohio school-day or nightwork rule.	Ohio imposes restrictions connected to school attendance and late-night work.	Ohio requires a meal period for minors on qualifying shifts.	Federal and Ohio hazardous-occupation rules apply.	Obtain required authorization, confirm school-day rules, and configure the timekeeping system for required breaks.
Indiana	Indiana uses an employer youth-employment registration or reporting system rather than the former traditional work-permit process. Verify current employer obligations.	Federal 3/18, 8/40, and 7:00 p.m./9:00 p.m. limits apply.	Restrictions vary by age, school enrollment, day, and time of year.	Do not assume a youth-specific break requirement; follow Company policy and confirm current law.	Federal hazardous-occupation rules apply; Indiana may impose additional restrictions.	Register or report the minor as required; verify current hours by age and school status before publishing the schedule.
Illinois	An employment certificate generally is required for covered minors under 16.	Federal hour and nightwork limits apply; any stricter Illinois requirements must also be followed.	Confirm current school-status and hours requirements.	Illinois meal-period law applies, and special youth requirements may apply. Confirm current timing and coverage.	Federal and Illinois prohibited-occupation rules apply.	Obtain the certificate; schedule the applicable meal period; confirm any additional one-day-rest or scheduling requirement.

State	Minimum Age / Work Authorization	14–15 Scheduling Limits / Nightwork	16–17 Scheduling Limits / Nightwork	Minor Break Rules / Meal Periods	Restaurant Task / Equipment Restrictions	Manager Action Items
Wisconsin	Work-permit or age-certificate requirements may apply depending on the minor's age and current law.	Federal limits apply to covered 14–15-year-olds, together with any stricter Wisconsin rule.	Confirm school-related hours and nightwork requirements.	Wisconsin has meal-period guidance or requirements affecting minors. Verify current rules before scheduling.	Federal hazardous-occupation rules and Wisconsin task restrictions apply.	Confirm the current permit process with HR; program required breaks; retain proof of age and authorization.
Iowa	Iowa's child labor law has undergone material changes. Verify current requirements before employing any minor.	Some Iowa provisions may allow longer or later work than the FLSA; federal 3/18, 8/40, and 7:00 p.m./9:00 p.m. limits control when stricter.	Confirm current state hours and any special program rules.	Confirm current Iowa requirements and follow Company break policy.	Iowa's allowed and prohibited tasks have changed. Federal hazardous-occupation rules continue to control covered employment regardless of a less protective state provision.	Obtain an HR review before the first shift and before assigning any cooking, equipment, freezer, or alcohol-related work.
Missouri	A work certificate or permit generally applies to employees under 16.	State daily, weekly, six-day, and nightwork limits apply; the federal 18-hour school-week rule controls when stricter.	Confirm state limits and school status.	Confirm current minor break requirements; follow Company policy at minimum.	Federal hazardous-occupation rules and Missouri prohibited-duty rules apply.	Obtain required authorization and apply federal limits where stricter. Verify nightwork before every late shift.
Nebraska	Employment certificate requirements may apply based on age and school status.	State daily/weekly and nightwork limits apply, including special restrictions for younger minors; federal limits control where stricter.	No general federal hour cap, but confirm Nebraska and school-related restrictions.	Confirm current minor break requirements.	Federal hazardous-occupation rules apply.	Obtain any required certificate and confirm school status. Do not use a special late-hours permit without HR approval.
Kansas	Generally 14 for covered restaurant work. A state certificate may be relevant in limited circumstances; maintain proof of age.	Kansas law may be less protective in some respects. Federal 3/18, 8/40, and 7:00 p.m./9:00 p.m. rules control covered 14–15-year-olds.	Confirm state and school-related restrictions.	Follow Company policy and confirm current state requirements.	Federal hazardous-occupation rules generally control covered restaurant duties.	Apply the federal floor; verify proof-of-age and any school requirement with HR.
Oklahoma	Work permit or age documentation requirements generally apply to younger minors. Confirm the current school-issued process.	Federal hour and nightwork limits apply to covered 14–15-year-olds.	Confirm school-related and state restrictions.	Oklahoma has break protections for certain younger minors. Confirm required timing before scheduling.	Federal hazardous-occupation rules and Oklahoma prohibited-duty rules apply.	Obtain required authorization; schedule and document breaks; apply federal limits even if state rules are less protective.

State	Minimum Age / Work Authorization	14–15 Scheduling Limits / Nightwork	16–17 Scheduling Limits / Nightwork	Minor Break Rules / Meal Periods	Restaurant Task / Equipment Restrictions	Manager Action Items
Colorado	Generally 14 for ordinary restaurant work, subject to restrictions. A school permit may be required for work during school hours; age certificates may be available or required in particular circumstances.	Federal 3/18 limit controls where stricter than Colorado's school-day allowance. State nightwork rules may also apply before school days.	Colorado limits daily and weekly hours for minors in certain circumstances.	Colorado meal and rest-period requirements must be separately verified and may apply to minors.	Federal hazardous-occupation rules and Colorado youth-employment restrictions apply.	Do not schedule during school hours without HR review; confirm Colorado meal/rest rules and use the stricter federal school-week limits.
Arizona	See the Arizona row above.	See above.	See above.	See above.	See above.	This state should appear only once in the operative QR-code version.
New Mexico	Work-permit or age-certificate requirements may apply based on age and school status.	Federal 3/18, 8/40, and 7:00 p.m./9:00 p.m. limits generally apply.	No general federal hour cap; confirm current New Mexico restrictions.	Confirm current minor meal/rest requirements.	Federal hazardous-occupation rules apply, plus any New Mexico prohibited-duty rules.	Obtain HR confirmation regarding the permit or certificate process before hiring; retain proof of age.
Nevada	Generally 14 for covered restaurant work. Verify any proof-of-age, parental, school, or authorization requirement.	Nevada may allow longer hours than the federal rule; federal 3/18 and 8/40 limits control for covered 14–15-year-olds. Confirm nightwork.	Nevada imposes daily or weekly restrictions in some circumstances. Confirm current rules.	Nevada meal and rest-period law must be reviewed separately and may apply based on shift length.	Federal hazardous-occupation rules and Nevada prohibited-duty rules apply.	Apply the federal floor, confirm current Nevada hour and break requirements, and retain proof of age.

Drafting note: Arizona appeared twice in the requested state list's regional sequence only if manually duplicated during formatting. The final published version should contain one Arizona row.

The scheduling summaries above use the U.S. Department of Labor's consolidated state standards as a baseline. That federal table was identified as current through July 15, 2025 and should be compared against each state agency's current materials before publication or operational reliance. (dol.gov)

Prohibited or HR-Approval-Required Tasks for Any Minor Under 18

The restrictions below are intentionally conservative. “HR approval required” means **advance written approval** identifying the employee, age, equipment or duty, legal basis, and applicable conditions.

Task or Equipment	Company Manager Rule
Meat slicer, meat grinder, meat chopper, food processor, meat saw, patty-forming machine, or other power-driven cutter	Prohibited for employees under 18 unless HR and legal counsel expressly confirm otherwise. Minors may not operate or clean prohibited equipment.
Baler or compactor	A minor must not operate the equipment. Do not permit loading, unloading, clearing jams, servicing, or proximity work unless HR provides written instructions under a specific lawful exception.
Driving or delivery	Do not assign a minor to delivery driving or other driving on public roads unless HR approves a specific written exception. Do not assume a driver’s license makes the assignment lawful.
Commercial mixer or power-driven bakery equipment	Prohibited or restricted depending on the employee’s age and the equipment. HR approval is required before a minor operates, cleans, sets up, adjusts, oils, or repairs the equipment.
Baking	Employees ages 14–15 may not perform baking activities. Employees ages 16–17 may not use prohibited power-driven bakery equipment. Obtain HR approval before assigning baking duties to any minor.
Freezer or meat cooler work	Employees under 16 may enter a freezer only momentarily to retrieve an item; do not assign regular freezer or meat-cooler work. Confirm state restrictions before assigning any minor.
Deep fryer	Ages 14–15 may use a fryer only when it has and uses an automatic basket-raising and lowering device. No manual-basket fryer operation.
Grill, broiler, rotisserie, pressure cooker, or high-speed cooking equipment	Ages 14–15 may perform only federally permitted limited cooking that does not involve an open flame. Restricted broilers, rotisseries, pressure cookers, fryolators, and similar equipment may not be used.
Cooking-oil filtering, transport, or disposal	Ages 14–15 may perform this work only within federal temperature limits and with permitted equipment. Managers should obtain HR approval before assigning the task.
Loading or unloading trucks or conveyors	Employees ages 14–15 may not load or unload goods to or from trucks or conveyors. Confirm restrictions for older minors before assignment.
Power-driven lawn mower or cutter	Employees ages 14–15 may not operate this equipment. Company managers should not assign power-driven grounds equipment to any minor without HR approval.
Alcohol sales, service, delivery, or handling	Follow the separate alcohol-service policy and all state and local minimum-age rules. Obtain HR approval before assigning any minor to alcohol-related sales, service, delivery, stocking, or handling.
Roofing, excavation, demolition, forklift, hoisting, or similar work	Do not assign. Contact HR if such work could arise during cleaning, maintenance, remodeling, receiving, or emergency operations.

Federal restaurant and hazardous-equipment restrictions include power-driven meat-processing equipment, certain commercial mixers and bakery machines, balers, compactors, and tightly restricted driving. ([dol.gov](https://www.dol.gov))

When to Contact Human Resources Immediately

Contact hr@jasonsdeli.com before proceeding when any of the following applies:

- The applicant or employee is **under 16**.
- **A manager proposes scheduling a minor:**
 - Past **7:00 p.m. during the school year**; or
 - Past **9:00 p.m. between June 1 and Labor Day**.
- A proposed school-day shift for an employee age 14–15 is longer than **3 hours**.
- A minor's combined schedule may exceed a daily, weekly, or six-day state limit.
- The manager is unsure whether the day is a school day or whether school is in session.
- The minor is homeschooled, attends online school, has graduated early, is enrolled in summer school, or participates in a work-study or work-based learning program.
- The manager is unsure whether a permit, certificate, registration, parental authorization, or school authorization is required.
- **The assignment involves:**
 - Delivery or other driving;
 - A slicer, grinder, chopper, food processor, or cutter;
 - A mixer or bakery machine;
 - A compactor or baler;
 - A freezer or meat cooler;
 - Baking;
 - Frying or open-flame cooking;
 - Truck loading or unloading;
 - Alcohol sales, service, delivery, stocking, or handling; or
 - Any powered equipment not expressly approved for the employee's age.
- A minor, parent, school official, or other person complains about hours, duties, breaks, safety, or authorization.
- The store receives an agency inquiry, records request, investigation notice, audit request, citation, or visit.
- A timekeeping alert shows a potentially late shift, excess hours, or missed break.
- A minor is injured, regardless of apparent severity.

Manager Scheduling Examples

Proposed Assignment	Manager Response
A 15-year-old is scheduled until 8:00 p.m. on October 15.	Do not schedule. The federal limit is ordinarily 7:00 p.m. outside the June 1–Labor Day summer period. Contact HR if unusual circumstances are asserted.
A 15-year-old is scheduled for five hours on Friday while school is in session.	Do not schedule. Friday is included as a school day for the federal three-hour limit.
A state chart appears to allow a 15-year-old to work until 10:00 p.m.	Do not use the later time. The federal 7:00 p.m./9:00 p.m. rule controls when more protective.
A 17-year-old asks to clean the slicer after closing.	Prohibited. Employees under 18 may not operate or clean prohibited power-driven meat-processing equipment.
A 15-year-old is asked to retrieve one item from a freezer.	Potentially permitted as momentary retrieval, but not as regular freezer work. Confirm the task and state rule with HR.

Proposed Assignment	Manager Response
A 15-year-old asks to operate the fryer.	Permitted only if every federal condition is met, including use of an automatic basket-raising and lowering device. Confirm the equipment with HR before assignment.
A 17-year-old has a driver's license and offers to make a delivery.	Do not assign. A license alone does not satisfy federal child labor restrictions. Obtain advance written HR approval under a specific exception.
A parent signs a letter authorizing later hours.	A parent cannot waive federal or state child labor protections. Use the authorization only where the law expressly permits it and HR has approved it.
The minor says no permit is necessary because another employer did not request one.	Do not rely on that statement. Verify the requirement through HR before the first shift.
The timekeeping system allows the shift.	System acceptance does not establish legal compliance. The manager remains responsible for verifying the schedule.

Required Store Records

Maintain records in the location and format directed by Human Resources, including:

- Full legal name and date of birth;
- Reliable proof of age;
- Work permit, employment certificate, age certificate, or other authorization;
- Parental or school authorization, when applicable;
- School enrollment and graduation information relevant to scheduling;
- Applicable school calendar;
- Work schedules and actual time records;
- Meal and rest-period records where required;
- Training acknowledgments;
- Written restrictions on equipment and duties;
- HR approvals or instructions; and
- Records of any complaint, injury, inquiry, or corrective action.

Managers must not retain unnecessary sensitive documents or copies contrary to HR's record-retention instructions.

Manager Acknowledgment Principles

Every manager supervising a minor should understand:

1. **Actual hours worked control.** A legally compliant posted schedule does not cure an early clock-in, late clock-out, missed break, or unscheduled work.
2. **All work time must be recorded and paid.** Never instruct a minor to perform setup, cleanup, training, messages, deliveries, or other work off the clock.
3. **Parents cannot waive the law.**
4. **A school permit does not authorize hazardous work.**
5. **A driver's license does not authorize delivery driving.**
6. **A job title does not determine legality.** The actual task and equipment determine whether the work is permitted.
7. **Cleaning can be prohibited even when operation is prohibited.** A minor must not disassemble, set up, clean, oil, repair, or clear a prohibited machine.
8. **The stricter rule wins.** Apply the most protective federal, state, local, school, and Company requirement.
9. **When uncertain, stop and contact HR.**

Sources to Verify

Human Resources should verify this document against the current versions of the following official materials during each periodic review:

- **U.S. Department of Labor, Wage and Hour Division, Fact Sheet #2A**, addressing child labor rules for restaurants and quick-service establishments;
- **U.S. Department of Labor, Wage and Hour Division, Fact Sheet #43**, addressing FLSA child labor requirements for nonagricultural occupations;
- **U.S. Department of Labor's Selected State Child Labor Standards Affecting Minors Under 18 in Non-Farm Employment**;
- **U.S. Department of Labor's Employment/Age Certification table**;
- **U.S. Department of Labor state labor-law and youth-employment pages**;
- The current child labor, wage-and-hour, meal-period, work-permit, and youth-employment materials issued by the labor, workforce, education, or licensing agencies of:

• Alabama;	• Arizona;	• Arkansas;
• Colorado;	• Florida;	• Georgia;
• Illinois;	• Indiana;	• Iowa;
• Kansas;	• Kentucky;	• Louisiana;
• Maryland;	• Mississippi;	• Missouri;
• Nebraska;	• Nevada;	• New Mexico;
• North Carolina;	• Ohio;	• Oklahoma;
• Pennsylvania;	• South Carolina;	• Tennessee;
• Texas;	• Virginia; and	• Wisconsin.
- Applicable local ordinances, school-district requirements, and state alcohol-control agency rules.

The handbook identifies these 27 states as Jason's Deli's operating states and instructs managers to consult state-specific information through the child-labor QR-code resource.

Document-Control Notice

Current as of September 2, 2026

Child labor laws, agency interpretations, work-permit processes, and state scheduling requirements can change. Human Resources should:

- Review this reference at least annually;
- Review it promptly following any federal or state legislative change;
- Confirm state permit and break requirements before publishing the QR-code document;
- Preserve prior versions and effective dates;
- Place a revision date on every published version; and
- Remove or replace outdated QR-code content immediately.

If this chart conflicts with a current law, agency instruction, or written Human Resources directive, follow the most protective current requirement and contact Human Resources immediately.