

Keeping California's Youth Safe on the Job

**Updated Recommendations of the
California Partnership for Young Worker Health and Safety**

**Labor Occupational Health Program
Center for Occupational and Environmental Health
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**prepared for the
Commission on Health and Safety and Workers' Compensation**

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TABLE OF CONTENTS

Executive Summary

Background.....	4
Accomplishments Since 1998.....	4
How the Recommendations Were Developed.....	5
New Priorities	6

Recommendations

1. School-Based Strategies	9
2. Initiatives in the Workplace	14
3. Strategies in the Community.....	20
4. Strengthening the Role of Work Permits.....	26
5. Strategies for Enforcement Agencies	30
6. Need for Further Research.....	33

California Partnership for Young Worker Health and Safety*

- Alameda County Office of Education
- California Association of Work Experience Educators
- California Center for Childhood Injury Prevention
- California Chamber of Commerce
- California Commission on Health and Safety and Workers' Compensation
- California Department of Education
- California Department of Health Services, Occupational Health Branch
- California Department of Industrial Relations, Division of Apprenticeship Standards
- California Department of Industrial Relations, Division of Labor Standards Enforcement
- California Employment Development Department
- California Federation of Teachers
- California Parent Teacher Association
- California Rural Legal Assistance, Inc.
- California Teachers Association
- California Workforce Association
- Cal/OSHA
- Collective Bargaining Education Project, Los Angeles Unified School District
- Labor Occupational Health Program, UC Berkeley
- Labor Occupational Safety and Health Program, UCLA
- New Ways to Work
- Teamsters Joint Council 42
- United Food and Commercial Workers, Local 428
- WorkAbility Program
- State Compensation Insurance Fund
- U.S. Department of Labor

* Participation in the Partnership does not imply official agency or organizational endorsement of the recommendations described in this report.

Background

The California Partnership for Young Worker Health and Safety was established in 1997 by the Commission on Health and Safety and Workers' Compensation. Its purpose is to find ways to reduce work-related injuries and illness among youth in California's workforce, as well as to develop young people's health and safety skills and to promote positive and safe employment for young workers. The Partnership brings together representatives from 25 key agencies and organizations that are involved with California youth employment and education issues, or that can otherwise play a role in educating and protecting young workers. Members include representatives from government agencies, parent and teacher organizations, labor unions, employer groups, and others.

The Partnership was established because young workers are being injured on the job in alarming numbers — often at higher rates than adult workers, even though youth under age 18 are legally protected from doing the most hazardous kinds of work. Coordinated efforts are needed to educate youth, employers, parents, and teachers, and to strengthen enforcement of health and safety and child labor laws.

Accomplishments Since 1998

In 1998, the Partnership released its first set of recommendations for better protecting and educating California's young workers. Over the past six years, the Partnership and its members have begun implementing several key recommendations, and have made significant advances on 12 of the 25 recommendations. Through these works, tens of thousands of youth, employers, parents, and teachers have received information on workplace health and safety and how to keep youth safe on the job. Key accomplishments include:

- **California Resource Network for Young Worker Health and Safety.** AB1599, passed in September, 2000, established the California Resource Network for Young Worker Health and Safety. The Network is made up of nine organizations with direct access to teachers, employers, and youth. With core funding from the Commission on Health and Safety and Workers' Compensation, the Network provides coordinated outreach and information to organizations and individuals throughout California. These efforts utilize the website www.youngworkers.org, toll free phone line, and direct training, mailings, and other outreach by all the Network members.
- **Safe Jobs for Youth Month.** Now in its seventh year, this annual public awareness campaign reaches thousands of teachers, youth, and employers with teaching kits, media reports, teen poster and journalism contests, and special local events and training.
- **Curricula for Teachers.** Several targeted workplace health and safety curricula for

teaching youth have been developed by Network members, including UCLA's Labor Occupational Safety and Health Program (LOSH) and UC Berkeley's Labor Occupational Health Program (LOHP). These curricula have been distributed to thousands of educators, including work experience educators, WorkAbility teachers, job trainers, school to career teachers, and many others. A list of curricula and other materials for can be found at www.youngworkers.org.

- **Institutionalized Training for Teachers.** Training on how to teach about job health and safety, using these curricula, has been institutionalized for WorkAbility teachers, and as part of the annual training conferences of the California Association of Work Experience Educators (CAWEE).
- **Outreach to Employers.** The Resource Network has developed materials and conducted outreach to thousands of employers of young workers. Materials include the *Facts for Employers* factsheet, *Tools for Orienting Worksite Supervisors*, the *California Work-Based Learning Tool Kit and Quick Guides*, and web-based information at www.youngworkers.org and www.scif.com.
- **Identifying Opportunities for Interagency Collaboration.** Partnership members met with key agency leadership from the Departments of Education, Industrial Relations, and Health to identify opportunities for interagency collaboration. Several agencies have increased their focus on young worker issues, and one small pilot collaborative project was initiated.
- **Improving Work Permit Systems.** Through promotional efforts, primarily on the part of CAWEE and Department of Education staff, many school districts have improved their work permit systems by sending staff for training, adopting computer-based systems, and providing information to youth and/or employers on labor and health and safety laws.

How the 2004 Recommendations Were Developed

Partnership members agreed that it was time to revise and update the 1998 recommendations and to establish new priorities for the group's work. During late 2003 and early 2004, subcommittees met to review accomplishments and draft revisions to the recommendations.

In March, 2004, a working symposium was organized to seek additional input on the new draft recommendations. The day-long symposium, "Young Workers at Risk: Planning for Action," included 20 Partnership members and 55 community members representing teachers, employers, job trainers, and youth. Fifteen youth participants, including occupational health peer educators from UCLA-LOSH's Young Worker Project and youth recruited from work experience programs, attended a meeting the previous day to learn more about the issues and to prepare for their involvement in the symposium. Symposium participants discussed original and new

recommendations, and suggested priorities. The new recommendations were finalized at a statewide Partnership meeting in June, 2004. The Partnership will use these recommendations, and the priorities identified, as a basis both for joint work by Partnership members and for efforts to be undertaken by specific agencies and organizations outside the work of the Partnership.

The 33 new recommendations developed by the Partnership are organized in the following categories:

1. School-Based Strategies
2. Initiatives in the Workplace
3. Strategies in the Community
4. Strengthening the Role of Work Permits
5. Strategies for Enforcement Agencies
6. Need for Further Research.

New Priorities

Partnership members and symposium participants agreed that outreach and education for youth, employers, teachers, and parents are key. There was also agreement that the efforts of the Resource Network and the annual Safe Jobs for Youth Month campaign should continue to provide the foundation for the Partnership's work, and should be expanded. This is reflected in the following two recommendations:

Identify adequate and permanent support for the Resource Network for Young Worker Health and Safety (Recommendation #15).

With core funding from the Commission on Health and Safety and Workers' Compensation, and extensive in-kind contributions from Network members, current Resource Network services include:

- Coordination of the Safe Jobs for Youth Month public awareness campaign
- Maintenance of a comprehensive website with information for all key audiences at www.youngworkers.org
- Staffing a toll-free hotline to answer questions and provide technical assistance on health and safety and child labor law questions
- Ongoing outreach, education, and training workshops conducted by Resource Network members for thousands of educators, youth, and employers.

If additional resources were available, Network members could develop new materials,

translate materials into more languages, and expand innovative programs for teaching about workplace health and safety and other workplace issues, such as peer education programs, throughout the state.

Identify ongoing support and resources for the statewide “Safe Jobs for Youth Month” campaign, to continue to raise public awareness of child labor laws and workplace health and safety issues faced by young workers (Recommendation #16).

More resources, partners, and specific activities need to be identified, especially at the local level, to extend the reach of this campaign. Having a “hook” or kick-off activity for the campaign is essential.

In addition, based on input from the symposium, Partnership members have selected the following four priority work areas for the next 1-2 years:

- **Integrating workplace health and safety into K-12 education (Recommendation #2).** The Partnership’s focus will be on finding ways to integrate information on workplace health and safety and child labor laws into state curriculum frameworks, as well as into related tests of graduation requirements, and approved lists of teaching resources. Promotion of existing teaching curricula by Resource Network members at both the state and local level will also continue.
- **Developing and distributing industry-specific educational materials for employers and young workers (Recommendations #9 and #12).** Partnership members will focus on two industries, restaurants and grocery stores, with a focus on smaller workplaces. They will also develop materials for employers who are immigrants. One pilot project has been initiated by Partnership members.
- **Developing a model for involving youth in health and safety planning, education, and advocacy at the local and statewide level (Recommendation #21).** Partnership members will recruit and train a group of youth planners, with the goal of holding a statewide meeting for youth within the next 1-2 years. The objective of this work is to actively engage youth in planning and conducting educational and advocacy strategies to promote workplace health and safety, in order to: 1) Promote youth leadership development and increase their participation in workplace problem-solving and civic discussion of workplace issues; and 2) Help develop effective education, outreach, and advocacy strategies that are relevant to and guided by youth themselves.
- **Improving work permit systems (Recommendations #22-25).** The initial focus will be on encouraging more schools to distribute basic, easy-to-read health and safety information to the student, parent, and employer as part of the work permit system. In particular, these information resources should be integrated into computerized systems that are now used by about half of the state’s school districts. Partnership members will continue to work together to encourage and assist school districts to be in

compliance with existing work permit requirements.

Other priorities identified at the symposium which the Partnership will explore further in the next 2-5 years are:

- **Promoting local collaboration between employers, youth, educators, job training organizations, parents, and enforcement agencies** (Recommendation #17). Participants in the symposium saw the value of bringing together at the local level the various agencies that share responsibility for protecting and educating young workers. The objective of this collaboration is to increase local sharing of information and resources, and to increase the effectiveness of local education and enforcement efforts.
- **Implementing opportunities for interagency collaboration** (Recommendations #26, #27, and #28). Once new agency leadership has been appointed by the new state administration, the Partnership will review previously identified strategies for interagency work with the new leadership. We will identify possible pilot projects, such as joint education and enforcement efforts, cross-training, and increased sharing of information.
- **Developing a multi-faceted, comprehensive employer outreach plan** (Recommendation #7). Partnership members will continue to test different ways to reach employers, including through the restaurant and grocery store pilot projects mentioned earlier, with the goal of developing a comprehensive plan in the next several years. This plan may include distribution of information through business license offices; through employer organization meetings, conferences, and newsletters; and through the annual Safe Jobs for Youth Month public awareness campaign.

The California Partnership for Young Worker Health and Safety has been a national leader in the effort to protect young workers from being injured on the job, and to prepare young people to take an active role in workplace health and safety as adult workers. Several other states have formed their own statewide young worker, “teams” and have modeled many of their efforts after the work being done in California. While there is a great deal of work still to be done, many young workers have already benefited from the training and increased attention to young worker health and safety that have grown directly out of the Partnership’s collective efforts.

RECOMMENDATIONS

Keeping California's Youth Safe on the Job

These recommendations represent the general consensus of the California Partnership for Young Worker Health and Safety. They are presented here to share the results of discussions to date, and do not include full implementation or funding plans. Implementation may be initiated by organizations within or outside the Partnership.

The Partnership acknowledges that all the agencies that should be involved in the implementation of these recommendations have limited resources. The critical work to follow will be to develop full implementation plans for the most promising recommendations. Such plans must include new collaborations and funding mechanisms that will make it possible to achieve the important objectives set out here.

1. School-Based Strategies

California's schools have very restricted budgets, and the Partnership in no way intends to detract from schools' most essential mandate to provide basic quality education to youth. A recurring concern during the Partnership's discussions has been the importance of identifying resources and partnerships that can assist the schools in meeting this basic mandate, while at the same time helping to better prepare youth for a safe, productive, and satisfying work life.

Achievements Since 1998

- Thousands of California teachers have received services from the California Resource Network for Young Worker Health and Safety, including training workshops for over one thousand teachers, technical assistance via phone and web, teaching curricula, and other educational materials.
- Key teacher resource organizations, including the California Federation of Teachers, the California Teachers' Association, the California Association of Work Experience Educators, New Ways to Work, and the Collective Bargaining Education Project, are all members of the Resource Network and now regularly feature and provide information and resources on health and safety through their newsletters and websites.
- Numerous effective, participatory health and safety curricula and training materials have been developed, in California as well as in other states, by the Resource

Network or with its assistance. See www.youngworkers.org for a list of available materials. In California, specific curricula now exist for Science, English, U.S. Government and other social studies classes, work experience classes, WorkAbility programs, career exploration classes, and other work-based learning programs.

- Peer education programs were developed in Oakland and Los Angeles to train youth to educate their peers about workplace and environmental health and safety issues. UCLA-LOSH's Peer Education Program at Manual Arts High School is in its third generation of students. The training approach and materials are available for replication.
- Training for teachers on teaching teens workplace health and safety has been institutionalized by the California Association of Work Experience Educators and the WorkAbility Program (for students with cognitive and learning disabilities), which offer workshops regularly at their conferences and regional meetings.
- Tools to assist work-based learning programs in meeting workplace health and safety obligations have been developed and promoted, including New Ways to Work's *California Work-Based Learning Tool Kit and Quick Guides* and UC Berkeley Labor Occupational Health Program's *Tools for Orienting Worksite Supervisors*.

Recommendation #1. Integrate information on workplace health and safety and child labor laws into all work-related programs in the schools.

Objective. To ensure that all students who participate in work-related school programs understand the importance of health and safety, can identify potential hazards, and know how to get help with health and safety and child labor law issues.

Description. The targets are various established vocational programs, including Regional Occupational Centers and Programs (ROCPs), Partnership Academies, Tech Prep programs, WorkAbility programs, School to Career systems, and Work Experience programs. Vocational education programs are already required to provide at least some training on workplace health and safety issues related to the trades they teach. While some of the career academies, such as the health academies, have developed health and safety materials, many vocational programs and instructors do not have the training or resources to cover health and safety adequately. Many high-quality materials addressing workplace health and safety, child labor laws, and other workplace rights and responsibilities already exist. New materials should be developed as needed. These materials should be distributed in a systematic way, accompanied by technical assistance, instructor training, and, where possible, program mandates that require active, skill-building training on these issues.

Among the suggested activities are:

- Identify existing workplace health and safety materials designed for youth.

Survey vocational and other work-related programs to determine the curricula and educational models they use, to assess their need for additional materials, and to find how these materials can most effectively be integrated into their programs. Also identify effective mechanisms for promoting use of specific materials (mailings, newsletters, teacher training, internet, e-mail, etc.). For example, survey other states to determine how health and safety training is integrated, promoted, and disseminated in their programs.

- Develop new materials as needed. Promote these and existing materials through the mechanisms identified during the activity above.
- Expand outreach to local work-based learning programs, including School to Career partnerships (students, labor, employers, schools), work experience programs, and WorkAbility programs to publicize the availability of training materials and technical assistance on health and safety from the Resource Network.
- Add health and safety to skill certification programs for students. Skills in identifying and responding to health and safety problems on the job should be included.
- Develop written, trade-specific safety guidelines for employers, teachers, and School to Career staff, to be distributed in both apprenticeship and academy programs.
- Promote integration of a health and safety component into model agreements between employers and their school district partners.
- Integrate health and safety issues into training for employer mentors and into teacher job shadowing programs.
- Provide assistance to school districts regarding liability issues (e.g. for unpaid interns).
- Augment and promote resources available through Resource Network members and on the www.youngworkers.org website. Add additional downloadable documents and links to downloads to this website.

Recommendation #2.

Integrate information on workplace health and safety and child labor laws into state curriculum frameworks, K-12, as well as into related tests, graduation requirements, and approved lists of teaching resources.

Objective. To ensure that California teachers will present material on workplace health

and safety and child labor laws in several core classes, by adding these topics to state curriculum frameworks.

Description. The California Department of Education's curriculum framework standards provide guidelines (in limited detail) on material teachers should cover in specific subject areas. The guidelines should add education about workplace health and safety to various subject areas as appropriate. Concurrent efforts must ensure that test questions reflecting these additions are also included in standardized tests, such as high school exit exams. The following frameworks appear appropriate and have been suggested for further exploration: Social Studies, School to Career, Regional Occupational Centers and Programs (ROCP), Physical Education, Work Experience Education, Career-Tech, and Health Education. Where relevant, frameworks at the elementary, middle, and high school levels should be reviewed.

Because this is a long-term goal, efforts should be made concurrently at the local level to change local requirements and to continue promotion and dissemination of existing effective curricula.

Recommendation #3. Integrate information on workplace health and safety and child labor laws into existing teacher training programs.

Objective. To ensure that, upon completing teacher training, all California teachers understand the importance of workplace health and safety and protective child labor laws, can identify potential hazards, and know how to get help with health and safety and child labor law issues.

Description. Workplace health and safety information should be included in teacher training—for example, through the required health class. Topics might include workplace injury and illness among youth, hazards on typical teen jobs, workers' legal rights, and resources to assist students who face health and safety problems at work. Strategies should focus on outreach to teacher training programs and their students, to share existing curricula and promote the importance of teaching about this issue.

Recommendation #4. Explore development of an online training and/or certification program to provide youth with basic information on workplace rights and health and safety.

Objective. To ensure that California youth who enter the workforce have had a basic introduction to the importance of health and safety, can identify potential hazards, and know how to get help with health and safety and child labor law issues.

Description. A number of online certification programs are currently in use, such as the “Passport to Safety” program in Canada and the “CareerSafe” program in Texas. Canada’s program allows young people who register to take a “test” based on learning outcomes developed by health and safety curriculum experts. The goal is to impart the minimum health and safety knowledge a young person should possess by the time he or she enters the workforce. The Texas program is interactive, and addresses the high-priority safety training needs of young workers. After a student successfully completes the 10-hour web-based CareerSafe course, he or she receives a wallet card from federal OSHA. Similar programs should be identified, compared, and evaluated to determine whether such a program should be developed for California youth. Online programs should be integrated with classroom-based training.

Recommendation #5.	Integrate information on workplace health and safety and other workplace rights into vocational education, labor studies, and other programs in community colleges.
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Objective. To ensure that community college students receive information and training on the importance of health and safety, identifying and controlling potential hazards, and how to get help with health and safety problems on the job.

Description. Community college students do not now receive systematic information on workplace health and safety and rights on the job. Classes and other campus programs where health and safety information and training should be included need to be identified. Appropriate curricula should be developed if necessary, and promoted to community college faculty. Community college students can also be trained as “near peer” educators to share this knowledge by teaching high school students.

Recommendation #6.	Integrate workplace health and safety into service learning programs.
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Objective. To foster student knowledge, civic responsibility, and involvement in young worker rights and health and safety issues through active participation in thoughtfully organized service learning, combining academic learning in the classroom with work on community issues.

Description. Service learning is a teaching strategy that integrates into, and enhances, the academic curriculum and the educational components of a community service program in which the participants are enrolled. Standards-based service learning components need to be developed and integrated into existing workplace health and safety curricula. Health and safety and labor law topics will provide opportunities for service learning students to relate to political and historical ideas. Peer education is one method shown to be an

effective teaching strategy, particularly in health-related areas, and also provides a valuable service learning opportunity for the peer educators themselves.

Several California organizations are building collaborations and working as advocates for service learning in the schools. They include Cal Serve, Youth Service California, and the Los Angeles Service Learning Partnership. High school program directors are another source of collaboration. Once high quality service learning curricula focusing on labor law and workplace health and safety issues have been developed, we need to collaborate with service learning organizations to disseminate them and add them to state and local lists of approved service learning curricula.

2. Initiatives in the Workplace

Under California law, employers are required to provide a safe and healthful workplace. They must conduct regular inspections to identify and correct hazards, maintain a system for workers to report health and safety problems, and provide training for all workers on the potential hazards in their workplace and procedures they must follow to work safely. In addition, there are specific regulations that protect workers under the age of 18 from doing the most hazardous tasks and from working too long, too late, or too early. Employers, especially smaller employers and those who do not hire teens frequently, are sometimes unaware of these laws. In addition to adequate enforcement of the laws (see section 5), employers also need education and assistance.

Achievements Since 1998

- The Resource Network developed an easy-to-read factsheet for employers, summarizing relevant child labor and health and safety laws. Copies are distributed primarily via school and community-based work experience programs that place youth in jobs. Over 4,000 are distributed every year, and it is also downloadable from www.youngworkers.org.
- Cal/OSHA compliance and consultation staff in some offices now distribute the employer factsheet to employers of young workers.
- The State Compensation Insurance Fund has added young worker information for employers to their website, and regularly posts information on Safe Jobs for Youth Month and other young worker information for employers.
- In 2001, the California Association of Work Experience Educators trained a cadre of educators to give presentations to employers on child labor laws, including information on health and safety. Presentations are conducted locally, on a periodic basis, with employers who have work experience students, or at local employer meetings.
- The State Compensation Insurance Fund has funded a small pilot project to develop

training materials for restaurant employers.

- The Cal/OSHA consultation service has also established a special emphasis on young workers in restaurants and will be conducting targeted outreach to restaurant owners.

Recommendation #7. Develop a multi-faceted, comprehensive employer outreach plan to raise employer awareness of their responsibilities and resources available to them.

Objective. To provide information and training to employer groups and their members on child labor laws, health and safety laws, and strategies for protecting young workers on the job.

Description. This multi-faceted approach should include strategies to alert all employers that they need specific legal information if they have employees under age 18. Strategies could include outreach through the business license application process or through the media, as well as strategies that target specific groups of employers most likely to higher young workers, such as newsletter articles and workshops for specific trade groups. The annual Safe Jobs for Youth Month public awareness campaign should have a strong employer education component.

An employer workshop should cover:

- In-dept information on child labor and health and safety laws
- Strategies for protecting young workers on the job
- Success stories to which employers can relate.

The California Association of Work Experience Educators (CAWEE) trained a cadre of work experience educators in 2001 to give presentations to employers, with an emphasis on compliance with child labor laws. Employer workshops are conducted occasionally at the local level. Additional CAWEE members should be trained and encouraged to conduct employer workshops.

Employer networks are already in place for wide dissemination of information and training. For example, a workshop could be presented at conferences of the National Alliance of Business and at industry association meetings in the restaurant, construction, and retail trade industries (as well as in other industries that employ substantial numbers of young people).

Recommendation #8.	Translate into more languages, and broadly distribute, existing informational factsheets for employers summarizing relevant child labor and health and safety laws.
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Objective. To provide employers with easy-to-use information that will help and motivate them to comply with child labor and health and safety laws, and to make them aware of the need to protect young workers on the job.

Description. In 1998, the Labor Occupational Health Program at UC Berkeley developed a factsheet, *Facts for Employers — Safer Jobs for Teens*, with Partnership input. Copies are distributed primarily via school and community-based work experience programs that place youth in jobs. Approximately 3,000 are distributed each year through the Resource Network, and it is also downloadable from the www.youngworkers.org website. Further activities should include:

- Assess the language needs of small businesses through agencies such as California offices of the federal Small Business Administration, and the California Employment Development Department, and through business organizations such as the Chamber of Commerce and trade associations.
- Translate the factsheet into appropriate languages.
- Develop and implement a broad distribution plan for the factsheet in collaboration with trade associations, insurance carriers, Chambers of Commerce, School to Career partnerships, Cal/OSHA, California Employment Development Department, and job placement agencies.

Recommendation #9.	Identify and distribute existing industry-specific educational materials for employers and young workers, covering hazards and solutions in the most common youth jobs (such as fast food and other restaurant work, retail sales, and work in grocery stores). Develop new materials as needed.
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Objectives. To provide targeted information that will enable employers and their young workers to identify and control hazards on the job. To present specific, practical strategies for protecting young workers in specific industries, including examples of successful efforts.

Description. Employers and young workers are most likely to use materials if they are simple and easy to understand. Simple materials could include short hazard checklists for employers, tailored to their specific type of workplace, to be used in conducting regular self-inspections as well as in worker training. A factsheet might also be developed with tips such as “Ten Things You Can Do to Protect Youth on the Job,” tailored to specific

industries. The State Compensation Insurance Fund (SCIF) has funded UC Berkeley's Labor Occupational Health Program to develop and pilot test "tailgate" training materials for use in the restaurant industry. The Cal/OSHA Consultation service has also developed a packet of informational materials to assist restaurant owners in establishing or improving their Injury and Illness Prevention Programs. These two efforts will be coordinated. Piloting of the training materials will be completed by Fall, 2004.

Additional materials could be developed by identifying and writing up "best practices" used successfully by employers in various industries. The following steps could help identify and disseminate "best practices":

- Use current data from the California Division of Labor Statistics and Research to identify the most common jobs or industries where youth get injured.
- Obtain information from investigators in the field (U.S. Dept. of Labor, California Dept. of Industrial Relations, Cal/OSHA, etc.) School to Career coordinators, job placement agencies, trade associations, major companies, insurance carriers, Chambers of Commerce, consultation services, and others with knowledge of employer practices.
- Review industry-specific literature regarding best practices for injury prevention.
- Review young worker-specific literature regarding best practices by event and source of injury.
- Explore funding opportunities for research and development of new educational materials on best practices.

The materials above could be used in educational efforts by career centers, Work Experience coordinators, teachers, employers, and others. Materials specifically directed at employers, including guidelines for best practices, could be promoted through the media, recognition award programs, employer-oriented publications, trade associations, health and safety groups, and human resource management organizations.

<p>Recommendation #10. Develop a program to identify best practices among employers who hire youth, and to recognize employers who are using these best practices.</p>

Objective. To increase the use of "best practices" by employers of young workers by sharing effective practices that employers are actually using and recognizing employers who use them.

Description. "Best practices" for training and supervising young workers, and for

implementing workplace protections, could be identified using the strategies described in Recommendation #9 above. As part of the annual Safe Jobs for Youth Month public awareness campaign, community organizations or local agencies could work with local employer organizations, youth employment programs, schools, and others to solicit nominations or letters of commitment from employers who are using certain identified best practices. The Partnership could also work in collaboration with the Voluntary Protection Program Association (VPPA) to identify best practices used by employers who have already been recognized by Cal/OSHA for their safety practices, and to work with Cal/OSHA and VPPA to highlight best practices for employers of young workers. Employers could be recognized in press releases or paid ads in the print media, or at specific events. Recognized employers could also receive a certificate to post in their workplace. This recognition would clearly state that employers are committed to using certain best practices; an employer would not receive an overall stamp of approval as a “good” employer.

Recommendation #11. Conduct outreach to employers through loss control and other employer consultants by incorporating information about protecting young workers into consultants’ existing services.

Objective. To reach employers of youth through existing, trusted sources who can help them comply with child labor and OSHA regulations.

Description. Key consultants who are already advising employers in youth-employing industries should be identified and contacted. Such individuals might include loss control consultants representing workers' compensation insurers, trade association representatives, OSHA consultants, and others. Training and resources should be provided to these consultants to enable them to offer advice and basic written information to the employers they serve. This advice and information should cover child labor laws, health and safety precautions, and effective supervision of young workers. The Cal/OSHA Consultation Service distributes the Resource Network factsheet, although not systematically. The State Compensation Insurance Fund (SCIF) has added web-based information on young workers for their employer clients at www.scif.com (click on “Information for Employers About Young Workers”).

Recommendation #12. Establish a collaborative venture with a key trade association and its insurer to develop a pilot training program for young workers.

Objective. To collaborate with employers and insurers to develop a model program for improving health and safety education of young workers in one industry. The objective is two-fold: to design, implement, and promote a training program for use by others in that

industry, and to provide a model of a collaborative partnership that can be replicated in other industries.

Description. A collaborative venture could focus on developing a model training program, including industry-specific educational materials targeted to young workers. One possibility is a project with the California Restaurant Association, which offers workers' compensation insurance to its member businesses provided by the State Compensation Insurance Fund (SCIF), including a loss control package. SCIF has funded UC Berkeley's Labor Occupational Health Program to develop and pilot test "tailgate" training materials for use in the restaurant industry. A partnership with the Restaurant Association will be explored once piloting is complete in late 2004.

Recommendation #13. Establish a collaborative venture with a key trade association and its insurer to develop and test a significant safety innovation in the industry.

Objective. To collaborate with employers and insurers to devise means to provide better protection for young workers in one industry. The objective is two-fold: to design, implement, and promote a safety innovation in that industry, and to provide a model of a collaborative partnership that can be replicated in other industries.

Description. A collaborative venture could focus on developing model engineering controls or other safety innovations, such as an interlock device for meat slicers that makes it impossible to start them without the guard in place.

Recommendation #14. Develop and deliver workshops for stewards and staff in unions with significant numbers of young members, addressing child labor laws and young workers' health and safety concerns.

Objective. To increase knowledge and awareness among union stewards and staff of child labor laws and young workers' health and safety concerns. This will help them better protect their young members by identifying and acting upon potential problems or violations, and by directing young members to sources of further information.

Description. By presenting the following information, a short workshop could help union stewards and staff develop problem-solving skills:

- Child labor laws

- Health and safety issues of special concern to young workers (including the importance of training and mentoring)
- Workers' compensation
- Enforcement agencies
- Resources for information and assistance.

3. Strategies in the Community

In addition to initiatives that need to be undertaken in schools and in the workplace, many community-based organizations, as well as the public at large, also need to understand and address the health and safety issues that young workers face. Community youth leadership and development programs can play an important role in educating and advocating for youth, and those that place youth in jobs have a clear obligation to train them on workplace rights and health and safety. Specific groups in the community, such as parents and health care providers, need to be prepared to identify problems and guide youth in their responses. A community-wide, vocal commitment to safe jobs for youth can help create an environment where employers are supported for good training and supervision of young workers, and where youth can speak up and play an active role in making their jobs safer.

Achievements Since 1998

- AB1599 established the California Resource Network for Young Worker Health and Safety to coordinate and provide information, outreach, teaching materials, training, and technical assistance on workplace health and safety issues to all of the key audiences, including the community. See Recommendation #15 for a description of current activities.
- The Resource Network established a comprehensive website, www.youngworkers.org, with information for teens, parents, employers, and educators, and links to all of the Resource Network and Partnership members.
- We increased collaboration among state and local agencies and organizations to conduct training, education, and outreach activities that promote young worker health and safety.
- Curriculum materials have been developed specifically for youth employment programs, including tools for orienting worksite supervisors of youth on their

health and safety responsibilities.

- Easy-to-use factsheets, *Tips for Parents*, and other appealing educational materials have been developed and are being actively promoted by Resource Network members.
- Replicable model peer education programs, where youth learn to teach their peers about workplace and environmental health and safety, have been developed; UCLA/LOSH has a current after-school program.
- The Partnership has coordinated an annual “Safe Jobs for Youth Month” public awareness campaign for six years, starting in 1999, reaching hundreds of thousands of teens, parents, employers, teachers, and others. See Recommendation #16 for a description of current activities.

<p>Recommendation #15. Identify adequate and permanent support for the Resource Network for Young Worker Health and Safety.</p>

Objective. To provide educational materials, ongoing technical assistance, and related support to schools, job training programs, and other organizations working to educate students and their communities about child labor laws and teen health and safety issues.

Description. In September, 2000, former Governor Davis signed into legislation AB1599, establishing the California Resource Network for Young Worker Health and Safety. The goal of the Network is to prevent California’s young workers from being injured or killed on the job by educating employers, educators, parents, and teens. The Network currently brings together nine organizations that can reach these audiences (see Attachments), with a focus on coordinating and augmenting existing outreach and education efforts and on providing technical assistance, educational materials, and other support to all of these audiences. The statewide Partnership serves as the advisory board for the Network. With core funding from the Commission on Health and Safety and Workers’ Compensation, and extensive in-kind contributions from Network members, current Resource Network services include:

- Coordination of the Safe Jobs for Youth Month public awareness campaign
- Maintenance of a comprehensive website with information for all key audiences at www.youngworkers.org
- Staffing a toll-free hotline to answer questions and provide technical assistance on health and safety and child labor law questions

- Ongoing outreach, education, and training workshops conducted by Resource Network members for thousands of educators, youth, and employers.

If additional resources were available, Network members could develop new materials, translate materials into more languages, and expand innovative programs for teaching about workplace health and safety and other workplace issues, such as peer education programs, throughout the state.

Recommendation #16. Identify ongoing support and resources for the statewide “Safe Jobs for Youth Month” campaign, to continue to raise public awareness of child labor laws and workplace health and safety issues faced by young workers.

Objective. To help protect young workers from injury by raising community awareness about child labor laws and workplace health and safety issues.

Description. The Partnership organized the first “Safe Jobs for Youth Month” campaign in May, 1999. To date, the campaign has involved the following components:

- Annual Governor’s proclamation in support of Safe Jobs for Youth Month
- Teen poster contest
- Teen journalism contest
- A resource kit mailed annually to thousands of teachers, including a poster designed by a teen, sample newsletter articles, a health and safety teaching activity, and a resource list
- A statewide media campaign, targeting relevant newsletters and websites as well as print, TV, and radio media
- Training workshops for youth and teachers conducted by various Partnership members
- Sponsorship of two special photo exhibits, highlighting historical photographs of child labor by Lewis Wickes Hine, as well as the winning Safe Jobs for Youth Month posters. These exhibits, held in San Francisco City Hall in 2003, and in Los Angeles City Hall in 2004, were tied to educational field trips and workshops for hundreds of local students.

More resources, partners, and specific activities need to be identified to extend the reach of this campaign. Having a “hook” or kick-off activity for the campaign is important. Local organizations could also sponsor special exhibits tied to Safe Jobs for Youth Month. Additional outreach could be conducted through public service messages, school district-sponsored TV stations, and other creative mechanisms. Up-to-date statistics should be compiled and used as part of this outreach. If possible, the campaign should be coordinated with other outreach campaigns, such as the summer campaign that has been conducted in the past by the U.S. Department of Labor. Possible funding sources include private and public foundations that have an interest in health and safety or in youth issues. Community-based organizations that work with youth may also have ideas regarding funding sources.

Recommendation #17.	Promote local collaboration between employers, youth, educators, job training organizations, parents and enforcement agencies.
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Objective. To increase local sharing of information and resources, and increase the effectiveness of local education and enforcement efforts.

Description. As at the state level, many agencies and organizations share responsibility for ensuring that youth are not injured in the workplace, yet do not communicate on a regular basis or know whom to contact for information. These include community-based youth employment and youth development organizations, school programs (including WorkAbility, Work Experience, and other staff involved in community placements of students), and local labor and health and safety enforcement and consultation staff. We can begin to address this “disconnect” by bringing these agencies and organizations together, either to work on specific issues, agreements, or projects, or to meet on a regular basis to share information and resolve problems. Local organizations involved in youth development or school-based staff who place youth in the workplace may be most well-positioned to initiate this kind of collaboration. An initial local or regional meeting could be modeled after the Partnership’s March 24, 2004 symposium, with technical assistance provided by Resource Network members.

Recommendation #18.	Collaborate with youth-focused community-based organizations to integrate information on workplace health and safety and child labor laws into after-school programs and other programs.
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Objective. To help ensure that youth who participate in community-based youth organizations have basic knowledge about the importance of workplace health and safety, their rights on the job, and how to get help if they have problems at work.

Description. Identify and collaborate with local community-based organizations in the field of youth development and/or leadership to create enriching learning opportunities focused on young worker rights and health and safety issues. Integrate this learning into after-school activities, either on campus or at a community venue. Strategies might include:

- Conduct a needs assessment (survey or interviews) with a representative sample of community-based organizations to assess the feasibility of integrating workplace health and safety information into youth programming.
- Partners in the California Resource Network for Young Worker Health and Safety can provide valuable technical assistance on health and safety to local organizations.
- Disseminate existing simple, easy-to-read bilingual materials to students, parents and other community members (see www.youngworkers.org). These summarize key information on teens' workplace rights and responsibilities as well as information on health and safety hazards.
- Develop train-the trainer or peer education models to build sustainability.

Research proves that youth who participate in high-quality after-school programs have better peer relations, academic success, and in-school conduct than youth who are not enrolled in programs. Quality programs coordinate their activities with schools and teachers in a way that supports learning and partnering. Therefore, this model meets the objective to build capacity in training youth about workplace health and safety issues.

<p>Recommendation #19. Improve health and safety training and orientation for young workers in job training programs, such as those funded by the federal Workforce Investment Act.</p>

Objective. To ensure that all students who participate in WIA-funded and other youth employment programs understand the importance of health and safety, can identify potential hazards, and know how to get help with health and safety and labor law issues.

Description. At present, youth participating in WIA-funded and other youth employment programs may receive some health and safety orientation from their community agency and/or from their own sponsor site. Many programs are using the *Work Safe!* curriculum, developed specifically for youth employment programs, as a result of OSHA-funded statewide training that occurred in 1998-2000. However, ongoing training has not taken place. As a result, the adequacy of health and safety training varies greatly from site to site. Effective health and safety training for WIA-funded and other job training programs should be institutionalized in the following ways:

- Establish local or state requirements that all programs receiving WIA funding:
 - Provide a minimum of 3 hours of basic health and safety training to their youth participants
 - Establish training agreements with employer/sponsor sites to ensure that youth participants also receive adequate health and safety training on site. (See www.youngworkers.org for resources such as *Tools for Orienting Worksite Supervisors*.)
- Provide regular regional opportunities for youth employment program staff to attend “training of trainer” workshops on teaching workplace health and safety. Resource Network members can provide several of these each year with current funding.

Recommendation #20. Develop and distribute informational factsheets and/or newsletter articles in English, Spanish, Chinese, Vietnamese, and other languages for parents and other community members.

Objective. To help protect young workers from injury by providing information on child labor laws and workplace health and safety issues to parents and other community members.

Description. All members of the community, including parents, medical providers, and others who work with teens should have an awareness of teen workplace health and safety issues and key child labor laws. Statewide and local organizations such as Parent Teacher Associations, Chambers of Commerce, labor unions, youth organizations, California Medical Association, community- and school-based parents’ centers, schools, and others should be encouraged to provide such information to their members and to parents through their newsletters, websites, or targeted factsheets. Some factsheets and other information have already been translated into Spanish, but not into other languages. The Department of Education, census data, and community-based youth organizations can probably confirm which languages to target first. Key information to disseminate includes teens’ workplace rights and responsibilities, hours and task restrictions, and the basics on health and safety hazards. It might be required or recommended that schools mail this information to parents every spring, when students begin looking for summer jobs. Additional outreach should be conducted to target non-English-speaking communities. Information on distribution mechanisms and numbers reached should be maintained, to help evaluate which methods are most effective.

Recommendation #21. Develop a model for involving youth in health and safety planning, education, and advocacy at the local and statewide level.

Objective. To actively engage youth in planning and conducting education and advocacy to promote workplace health and safety, in order to: 1) Promote youth leadership development and increase their participation in workplace problem-solving and civic discussion of workplace issues; and 2) Help develop effective education, outreach, and advocacy strategies that are relevant to and guided by youth themselves.

Description. There are many opportunities and some existing models for involving youth in this issue.

- Peer education programs have been shown to be effective in educating teens (California and Massachusetts)
- Youth have served as spokespeople in media outreach efforts and have advocated for changes in child labor laws (Massachusetts)
- Youth Councils, which include youth members, oversee employment programs and services of Workforce Investment Boards nationwide
- Youth serve as Associated Student Body leaders and in other school-based youth organizations and leadership classes, as well as on city youth commissions and other community boards
- Youth are being involved in planning and decision-making on other “youth” issues, to which workplace issues should be added.

A working group could be organized to collect information on related programs and best practices, recommend specific approaches at the local level, inform the work of the Partnership, and develop tools and resources for promoting these practices and strategies.

4. Strengthening the Role of Work Permits

In California, anyone under the age of 18 is required to obtain a work permit to do paid work. The only exceptions are for those who have already graduated from high school or received their Certificate of Proficiency, who are employed in exempt jobs such as yard work or babysitting, or who work for their own families. Employers must ensure that employees under 18 have a permit for that specific place of employment. Permits carry information explaining the maximum number of hours the young person may work in a day, the range of hours during the day that

he or she may work, limitations on types of work allowed, and any additional restrictions imposed at the school's discretion.

Young people obtain work permits from their school or school district office. They submit an application signed by a parent and by the prospective employer. By law, work permits must be issued by trained certificated personnel [E.C. §49110]. However, in many districts, the issuing personnel still have little or no training about child labor laws, workplace health and safety regulations, or related issues affecting teenagers in the workplace.

The California Department of Education oversees the work permit system, and has developed a model work permit and application that districts can use. However, each district is responsible for issuing permits that meet state requirements and for monitoring its own work permits. Districts are not currently required to use the Department's work permit format. More than half of California's school districts currently use a computer-based work permitting system, which generates work permits that reflect state and federal child labor laws. At this time, approximately three companies market these systems in California. The most commonly used, the Quick Permit system by Touchline, generates work permits that meet state requirements, but are not identical to the Department of Education's model permit.

Achievements Since 1998.

- More work permit issuers receive training. The California Association of Work Experience Educators (CAWEE) reports that more districts are sending staff to their semiannual conferences, currently the only place staff can receive training designed for work permit issuers.
- More schools have adopted computer-based systems, which guarantee legally accurate permits and allow schools to more easily track work permit statistics.
- The Department of Education has developed a high quality model work permit and application, which can be copied or downloaded for use by school districts throughout the state.
- Easy-to-use factsheets for employers and youth have been developed and are widely, though not systematically, distributed. They can be downloaded at www.youngworkers.org.
- The Department of Education sent a letter to all district superintendents reminding them of their work permit responsibilities and available resources (2001).

Recommendation #22. Require that all school districts use the Department of Education’s model work permit and application, or a computerized work permit management system that produces comparable work permits that meet state requirements.

Objective. To ensure that all work permit forms meet state standards, and to make the work permit process less confusing for employers and easier to enforce.

Description. Currently, districts are allowed to use their own work permit format, and although permits are required to meet state standards, in practice they sometimes do not. In addition, work permits for students from different school districts can and often do look different, so employers and enforcement officers must familiarize themselves with many different forms. Use of a standardized permit, either through a computerized system or by downloading the Department’s permit, would ensure that all permit formats meet state requirements, and would make the system less confusing. The Department of Education, Division of Labor Standards Enforcement, and representatives of computerized work permit system companies should continue discussion to develop consensus on the Department of Education’s model permit and application, and how to tailor the computerized systems to generate comparable permits.

Recommendation #23. Utilize incentives and/or state requirements to ensure that each school district in California establishes a coherent, comprehensive system for issuing work permits.

Objective. To ensure that work permits are distributed and monitored by trained, knowledgeable staff who have an awareness of health and safety and child labor laws, and who are given adequate time to carry out these functions.

Description. The intent is that each school district office and each school have one to three designated certificated staff on site to issue and monitor work permits. If there is a certificated Work Experience education teacher or coordinator on site, he or she would be required to be one of the designated staff. Each school district would be required to provide and regularly update a list of designated staff to the Department of Education. Schools would be required to provide all staff who issue work permits sufficient work time to fulfill the related functions. (Nothing above is intended to prevent a district superintendent from designating qualified staff at job training organizations to issue work permits for their own participants.) Incentives could include free training at CAWEE conferences, technical assistance by experienced work experience coordinators, and recognizing districts for best practices. (See also Recommendation #25.)

All work permit staff would be required to receive training on:

- Child labor laws
- Health and safety regulations
- Sexual harassment and other workplace discrimination issues
- Workers' Compensation
- How to approach an employer to raise problems
- Work permit policies and responsibilities, and the consequences for employers of non-compliance
- Education code sections related to work permits.

(Some of these would require changes to E.C. §49110.) A certificate program could be developed to certify staff who have received training on these issues.

Recommendation #24. Require that certificated staff who issue work permits provide basic, easy-to-read health and safety information to the student, parent, and employer as part of the process.

Objective. To increase student, parent, and employer awareness of workplace health and safety and child labor laws by providing information before students begin work.

Description. Basic information to be provided should include:

- Child labor and other labor laws (including wage issues)
- Health and safety regulations
- Sexual harassment and other workplace discrimination issues
- Workers' compensation
- How to approach an employer to address problems
- Phone numbers for local enforcement agencies (U.S. Dept. of Labor, California Division of Labor Standards Enforcement, Cal/OSHA, etc.).

The student, parent, and employer should be required to sign that they have read and

understand the information. Also, work permit issuers should be encouraged to provide counseling on workplace rights and responsibilities to students applying for permits. Districts can download factsheets for youth and employers from www.youngworkers.org, or develop local versions to include local contact information.

<p>Recommendation #25. Promote school district compliance with existing and proposed work permit requirements by providing essential resources, including educational materials, training, computer programs, and financial assistance.</p>

Objective. To increase school, student, and employer compliance with work permit requirements.

Description. A student with a work permit that is effectively monitored by the school is more likely to have a safe work environment. Even existing work permit requirements help provide this protection, if schools comply and have adequate resources. Until there is a more efficient system, increasing compliance with present regulations is vital. District superintendents are ultimately responsible for ensuring compliance with work permit regulations within their districts. Outreach and education should include a focus on superintendents through mailings, conferences and other communication that will reach them. For example, the Department of Education should issue an annual letter reminding superintendents of their responsibilities when issuing legal work permits; of information available via CAWEE, the Department of Education, and the www.youngworkers.org website; and the availability of training and assistance from CAWEE.

The California Department of Education and local school districts would require additional funding and staffing to fully implement some of the measures below. These include:

- Provide to schools separate, easy-to-read factsheets for students, employers, and parents (as described in Recommendation #24). These could also be pages that download automatically with computer-generated work permits.
- Provide regular training and update sessions throughout the state to school personnel who issue work permits. These are currently available at regional CAWEE conferences that take place annually in Northern and Southern California
- Promote school district and individual school use of software systems to track work permit information. (These are now available through several private companies.)
- Provide adequate resources for school site staff to comply with existing work permit requirements.

5. Strategies for Enforcement Agencies

The three primary agencies that enforce laws protecting youth in the workplace are the U.S. Department of Labor (DOL) and the California Department of Industrial Relation's Division of Labor Standards Enforcement (DLSE) and Division of Occupational Safety and Health (DOSH, also known as Cal/OSHA). All of these agencies have limited enforcement staffing. Although each agency conducts some targeted inspections, they are primarily complaint-driven. Workplaces do not receive regular inspections.

Achievements Since 1998

- The Resource Network met with agency heads in 1999-2000 to identify a list of possible interagency activities, and to explore development of an interagency task force.
- DLSE and Cal/OSHA are piloting a cross-referral system in the Sacramento area.
- Some Cal/OSHA consultation and enforcement staff distribute the *Are You a Working Teen?* factsheet, which includes information on child labor laws, when they see that an employer has young workers.
- Cal/OSHA has designated a young worker coordinator on its consultation staff, in particular to target inspections in the restaurant industry

Recommendation #26. Develop a system to exchange critical information for protecting youth at work among relevant enforcement agencies.

Objective. To increase the ability of inspectors to identify suspected serious problems outside their own jurisdiction, and to report them to the appropriate agency.

Description. Information could be provided to inspectors through cross-training, written checklists or factsheets, or other practical delivery systems. An initial needs assessment should be conducted to determine what each group of inspectors needs to know in areas outside their own jurisdiction. For example, federal and state labor law inspectors, or county health inspectors, might be provided with a basic introduction to key indicators of serious health and safety problems, although these are not specifically within their jurisdiction. (A factsheet might be developed with "The Five Most Important Problems to Look For.") A system should be established for inspectors in other fields to report suspected workforce health and safety problems to DOSH (Cal/OSHA).

Similarly, Cal/OSHA inspectors should receive information on the most critical, detectable violations of child labor laws (“red flags”), and there should be a system for them to report suspected violations to the DOL and/or DLSE.

Inspectors from all agencies could also be provided with factsheets for employers, summarizing the key laws in various areas. They could then distribute these in the course of their contacts with employers.

DLSE and Cal/OSHA have recently begun piloting a cross-referral system in the Sacramento area. Cal/OSHA inspectors have also at times, although not systematically, distributed the *Facts for Employers* factsheet when an employer has young workers.

<p>Recommendation #27. Develop a targeted joint enforcement, consultation, and education effort (involving DOL, DLSE, DOSH, and other relevant agencies) in an industry with a high number of injuries to youth, such as restaurants/fast food.</p>

Objective. To increase employer compliance with child labor laws, health and safety regulations, and employment tax laws by increasing the visibility and effectiveness of enforcement efforts in an industry with a high number of injuries to youth.

Description. This project could be modeled after the Targeted Industries Partnership Program (TIPP), which existed for several years in the 1990s but is not current. It combined and coordinated resources from federal, state, and local agencies to enforce labor laws and educate employers and employees about those laws. TIPP's four lead agencies, the California Division of Labor Standards Enforcement (DLSE), the California Division of Occupational Safety and Health (DOSH-Cal/OSHA), the California Employment Development Department (EDD), and the U.S. Department of Labor, Wage and Hour Division (DOL) developed TIPP's agenda and recruited other agencies to participate. Both DOL and the Cal/OSHA Consultation Service currently have designated restaurant employers with young workers as a targeted group for education. Enforcement components should be added to this focus.

<p>Recommendation #28. Develop interagency programs to share inspection and/or injury data that could help target inspection efforts.</p>

Objective. To enable enforcement agencies to target inspection efforts toward establishments or types of establishments with higher than average rates of injury or non-compliance, or with serious injuries or violations, involving teen workers.

Description. DLSE, DOL, DOSH-Cal/OSHA, the California Division of Labor Statistics, and Research, and workers' compensation insurance carriers do not currently share data on a regular basis. For example, DOL has not been able to get workers' compensation reports because of privacy restrictions. A working group should be established to:

- Identify types of data (not protected by privacy regulations) that would be useful to other enforcement agencies.
- Identify and implement ways to efficiently share this information among appropriate agencies. For example, Cal/OSHA inspection or accident investigation data could be coded to indicate involvement of a worker under 18, flagging it for referral to DLSE.

Most of these data-sharing efforts would require statutory changes, which poses a significant barrier to implementing these recommendations.

<p>Recommendation #29. Establish a consultation program within DLSE to provide consistent labor law information and assistance to employers and employees.</p>

Objective. To increase employer compliance with child labor laws by providing employers and employees a means to obtain detailed information about applicability of laws to their individual situation, without the threat of an immediate compliance inspection.

Description. DLSE does not currently offer employers consultation services to help them comply with the law without the immediate threat of a compliance inspection. However, the possibility of developing such services is under consideration within DLSE. A possible model is the Cal/OSHA Consultation Service, which provides free assistance to employers and employee groups regarding compliance with health and safety regulations. Staff in Cal/OSHA's program do not share information with Cal/OSHA's compliance arm unless an employer is seriously out of compliance and makes no effort to comply.

Federal DOL also has no consultation service at present. Development of a federal consultation service could also be explored.

<p>Recommendation #30. Explore development of a “diversion program” for fines paid by violators of child labor laws.</p>

Objective. To use funding from child labor fines to educate employers, youth, and others about protection in the workplace and/or to develop “best practices.” The purpose would be to reduce the number of young workers injured on the job. (See Initiatives in the

Workplace.)

Description. Fines for violations would be used to fund programs to educate youth, employers, and others about child labor laws and about workplace health and safety. Some funds could also be used to develop and publicize best practices.

6. Need for Further Research

Research that provides information about where and how youth are injured or made ill while working is essential for targeting and evaluating prevention efforts. Existing federal and state data sources can provide some basic information about where teens work and where and how they get injured, but this information often is not reported in a way that can inform prevention strategies. For example, age categories often do not match the categories used in child labor laws. Information is also incomplete in many ways. In addition to making better use of existing data, additional targeted research is needed to better plan preventive strategies.

Achievements Since 1998

- Some federal Bureau of Labor Standards (BLS) data on fatalities is now reported with appropriate age breakdowns.
- Some research on the effectiveness of different prevention strategies has been published (outside the Partnership's work).
- Young workers have been added as a targeted category in California's Fatality Assessment and Control Evaluation (FACE) project, a surveillance project on fatal occupational injuries.

<p>Recommendation #31. Issue an annual or biannual report on young workers in California, including information on how many there are and where they are working, with occupational injury and fatality statistics. Statistics should use age categories comparable to those used in child labor laws.</p>

Objective. To assess trends in youth employment and injuries, both to target prevention efforts and, over time, to evaluate whether young worker injury rates are changing.

Description. In preparation for each annual Safe Jobs for Youth Month, a brief summary of available California statistics could be prepared and published with other new available research or national statistics.

Improving available statistics would enhance this effort. Existing data sources could be evaluated to assess the feasibility of developing indicator statistics for occupational illness and injury among young Californians. Occupational health indicators provide information about a population's health status with respect to workplace exposures or injuries. Indicators may include BLS data, numbers of calls to poison control centers, and workers' compensation data. These indicators can serve as a minimal way to track illness and injury among young workers, including trends over time, and can help inform programs and policies designed to protect them. The Council of State and Territorial Epidemiologists (CSTE) Occupational Health Surveillance Work Group and health agencies in other states should be consulted to help select the best indicators for illness and injury among young workers.

Statistics that would be useful include:

- Employment statistics for those under 14, 14/15, 16/17, and 18-24
 - Number of hours worked per week
 - School status
 - Industry and/or job category
- Injury and illness statistics for those under 14, 14/15, 16/17, and 18-24
 - Number of hours worked per week
 - School status
 - Industry and/or job category.

Recommendation #32. Identify data gaps regarding occupational illness and injury among young California workers, and develop strategies for filling them.

Objective. To develop strategies for collecting necessary data to help direct and target prevention efforts.

Description. It is currently difficult to find detailed state and local data on the numbers of working teens, where they work, and where and how they get hurt. Some individual research studies have helped provide insight in areas where data is not available. However, it may be possible to identify relatively efficient ways to collect and make available more complete, detailed data. For example, state-based surveillance programs, particularly those

supported by NIOSH, could be expanded to allow for combining all the sources of data on nonfatal injuries and illnesses sustained by young workers, and to develop appropriate links to surveillance so that relevant data collection is designed to support local intervention efforts.

<p>Recommendation #33. Evaluate existing educational materials, curricula, and outreach strategies to assess their effectiveness and to determine which strategies should be given priority.</p>

Objective. To determine which strategies are most effective in changing the knowledge, attitudes, and behaviors of the audiences we are trying to reach (such as employers, youth, and educators), so that we can focus resources on those strategies.

Description. Most educational materials and outreach strategies currently in use by Resource Network members and others have not been sufficiently evaluated. Resources need to be identified to begin evaluating materials and strategies that are most widely used.