



Texas Child Labor Compliance Checklist

Age, hours, prohibited duties, and documentation for employing minors in Texas — under both TWC and federal FLSA rules.

WHAT THIS HELPS YOU DO

Use this checklist before hiring any worker under 18, and again when schedules or duties change, to comply with both Texas child labor law and the federal FLSA — whichever is stricter controls.

WHEN TO USE THIS DOCUMENT

- Before extending an offer to anyone under 18
- When scheduling minors during school weeks and summer breaks
- Before assigning new duties or equipment to a minor
- When school starts and summer schedules must change
- During seasonal hiring surges

WHAT THIS DOCUMENT HELPS PREVENT

- TWC and federal child labor penalties — assessed per violation, per minor
- Minors operating prohibited equipment 'just this once'
- Hour violations that appear the week school resumes
- Age documentation gaps discovered during an investigation
- Supervisors improvising rules they've never been taught

Faulkner HR Solutions focuses on the system behind the people problem. This tool is designed to help employers slow down the decision, identify the risk, and create proof before the issue becomes a claim, complaint, turnover event, or credibility problem.

BEFORE YOU START: READINESS CHECKLIST

Gather the following before working through this document. Incomplete inputs are one of the most common reasons employer decisions fail under later scrutiny.

Have it	Input	Notes / location
☐	Employee name and role	
☐	Date of incident, request, or separation	
☐	Supervisor involved	



Have it	Input	Notes / location
☐	Policy or handbook section that applies	
☐	Prior documentation on file	
☐	Pay records, if applicable	
☐	Relevant emails, texts, notes, or complaints	
☐	Decision-maker name	
☐	Deadline, if applicable	



CHILD LABOR COMPLIANCE CHECKLIST

Texas and federal rules both apply, and the stricter rule wins on every point. Complete this per minor, and re-check when age, schedule, or duties change.

Part 1 — Minor's Profile

Minor's name and date of birth (verify — do not take the application's word)	
Age at hire	
Position and primary duties	
School enrollment status	
Parent/guardian contact	

Part 2 — Age Verification and Documents

Done	Documentation step	Notes
☐	Proof of age obtained (birth certificate, ID, or certificate of age from TWC)	
☐	Copy retained in the minor's file	
☐	I-9 completed (minors are not exempt)	
☐	Parental consent obtained where the employer requires it	
☐	Hardship/actor/family-business exemptions verified, if claimed	

Part 3 — Hours Rules for 14-15 Year Olds

Texas law and the FLSA both restrict 14-15 year olds. The federal rules below are the stricter set on most points — follow them.

Rule	Limit	Compliant?
School day hours	Max 3 hours on a school day	
School week hours	Max 18 hours in a school week	
Non-school day / week	Max 8 hours per day / 40 per week	
Time of day (school year)	Only 7 a.m. - 7 p.m.	
Time of day (June 1 - Labor Day)	Until 9 p.m.	
During school hours	Not permitted while school is in session	

**Part 4 — Rules for 16-17 Year Olds**

OK	Check	Notes
☐	No federal hour limits — but hazardous occupation rules still fully apply	
☐	Texas: no state hour caps at 16-17, but verify any local curfew rules	
☐	Schedule reviewed so duties never drift into prohibited tasks during rushes	

Part 5 — Prohibited Duties (all minors under 18)

Federal Hazardous Occupations Orders bar workers under 18 from these regardless of hours or parental consent. Mark each as verified-not-assigned.

Verified	Prohibited duty	Notes
☐	Driving as a regular job duty (very limited 17-year-old exceptions)	
☐	Operating meat slicers, dough mixers, bakery machines, or power-driven saws	
☐	Operating forklifts, hoists, or most power-driven machinery	
☐	Roofing, excavation, demolition, or wrecking work	
☐	Working with explosives or radioactive materials	
☐	Mining, logging, or sawmill work	
☐	For 14-15: additionally no cooking (except limited), no ladders/scaffolds, no warehouse work	
☐	Alcohol service rules verified with TABC for the specific role and age	

Part 6 — Supervisor Controls

Done	Control	Owner / date
☐	Supervisors given a one-page card of this minor's allowed hours and prohibited duties	
☐	Scheduling system flags the minor's hour limits	
☐	'Just this once' equipment coverage explicitly forbidden in writing	
☐	School-year schedule change calendared for late August	
☐	Re-review calendared for the minor's next birthday	



Role	Name / signature	Date
Completed by		
Supervisor briefed		
Reviewed by		

STOP AND REVIEW BEFORE ACTING

If any statement below is true, pause. Get the decision reviewed by HR, counsel, or Faulkner HR Solutions before you act.

- ☐ A minor is scheduled past 7 p.m. during the school year and no one flagged it.
- ☐ A 17-year-old is 'helping' on the slicer, the fryer, or the forklift during rushes.
- ☐ Age was never verified with a document — just the application.
- ☐ The same schedule template is used for minors and adults.
- ☐ A supervisor sees hour rules as suggestions during busy season.

MINIMUM DOCUMENTATION STANDARD

Before this file is closed, the employer should be able to answer every question below and point to where the proof lives.

Question	Your answer / where the proof is stored
What happened?	
When did it happen?	
Who observed or reported it?	
What policy, standard, deadline, or expectation applies?	
What decision was made?	
Who had authority to make the decision?	
What alternatives were considered?	
What risk was reviewed?	
What follow-up is required?	
Where is the proof stored?	



COMMON MISTAKES

1. Assuming parental permission overrides hour or hazard rules — it doesn't.
2. Forgetting the schedule change when school starts in August.
3. Letting 14-15 year olds work during school hours for 'work programs' never verified.
4. Treating hazardous-occupation rules as applying only to full-time roles.
5. Missing that federal and Texas rules differ — and the stricter one always controls.
6. No system flag, so one busy Friday produces three violations at once.

WHAT TO DO NEXT

File the checklist in the minor's records, hand the supervisor card to every shift lead, and calendar the two danger points: the school-year schedule change and the minor's birthday. Re-run the checklist at both.

Before you terminate, deduct, discipline, classify, or respond, get the decision reviewed.

Call 210.446.8730 or email thomas@faulknerhrsolutions.info.



Before you process payroll, terminate, classify, deduct, or respond to a claim, get the decision reviewed.

Need help applying this to a real workplace decision?

Faulkner HR Solutions helps Texas employers, nonprofits, municipalities, and growing businesses fix the people systems behind recurring workplace problems.

If this document raised a risk flag, do not guess your way through the next step.

Call: 210.446.8730

Email: thomas@faulknerhrsolutions.info

Website: faulknerhrsolutions.info

DISCLAIMER

This resource is provided for general employer education and planning purposes. It is not legal advice and does not create an attorney-client relationship. Employment laws, agency guidance, and local requirements may change. Employers should review the facts of each situation before acting and consult appropriate HR or legal counsel when needed.