

**APPENDIX J:
INTERVIEW QUESTIONS FOR WAGE AND HOUR DIVISION NATIONAL AND REGIONAL STAFF**

For National Staff

Compliance assistance—General

- Is there a specific compliance assistance strategy for child labor, written or unwritten? How do materials developed at the local level with a specific purpose in mind fit into the overall strategy?
- How does external compliance assistance (e.g., presentations) work into the overall strategy?
- Does your Region have a compliance assistance strategy? (One that might differ from the National one in some way; written or unwritten.)
- What are the roles of the National office and the Regional offices in providing child labor compliance assistance and in distributing compliance assistance materials?
- What's the relationship between an investigation and the compliance assistance offered during an investigation? How do compliance assistance materials and investigations work together to affect compliance? Does the relationship differ depending on the type of investigation (i.e. general FLSA vs. child labor focused)?
- We'll be conducting surveys and we'll be asking about the materials supplied to employers and non-employers. What are the most important materials for employers? For parents, teens, and educators? Were these materials developed with a specific purpose in mind?
 - If you were to recommend 3 publications for an employer to use to ensure compliance with child labor provisions, what would those be? Would the recommendation vary by industry?
 - If you were to recommend 3 publications for a parent or educators to use, what would those be?
- In terms of child labor-related compliance assistance, how does the approach for non-agriculture differ from agriculture?
- What are the roles of the National office and the Regional offices in providing child labor compliance assistance and in distributing compliance assistance materials?

Compliance assistance—YouthRules!

- What's the history of the YouthRules! web site? When was it put online? What was the original purpose? Has that changed over time?
- How is the web site promoted among employers? Among parents, educators, and teens?
- There are many materials on the web site, is there a focal point of the web site?
- How is the web site intended to be used by employers? What should they be looking for?
- How is the web site intended to be used by parents, educators, and teens?

Investigations

- Describe the investigation process.
 - How are employers selected for an investigation?
 - What sort of activities takes place prior to the investigation? Is the employer ever informed before the investigation occurs?
 - What sorts of activities take place before the investigation?
 - What sorts of activities take place after the investigation?
 - When is the employer informed about the results of the investigation?

- Is there an appeals process? How often are investigations appealed?
- During an investigation, how does an investigator determine if a child labor violation has occurred?
- Do investigators routinely review CL laws with employers? Even for places where children are less likely to be employed?
- What are the general challenges to uncovering child labor violations that investigators face? Are there any challenges specific to child labor?
- What sort of leeway does an investigator have in citing employers for violations for child labor violations? Are there cases where a violation is cited at one employer but not another (within a particular multi-establishment enterprise? Within an industry? Within a geographical area?)? What would lead to those differences in citations?
- Is there some criteria for determining what employers get which compliance assistance materials at the end of an investigation?
 - How are the materials distributed to the employers? Are they provided with hard copies or do the investigators suggest the materials?
 - Do you think the employers actually use the materials? Why?
- How are (child labor) investigations planned from a National perspective? How are they planned at the Regional level?
- In terms of (child labor) investigations, how does the approach for non-agriculture differ from agriculture?
- In your experience, what would you say are the main reasons that employers violate child labor laws?
- What sort of good practices by employers lead to compliance with child labor provisions?
- How do the Federal and state laws interact? Including the need for certificates. Does state enforcement/coverage differ much from state-to-state? Is the level of child labor enforcement generally on par with state enforcement of other labor protections (e.g. FLSA)?
- What are some of the limitations of the WHISARD data? Are there some things that are not entered or not entered consistently across Regions/District Offices/Investigators?

For Regional Staff

Compliance assistance

- Does your Region have a compliance assistance strategy? (One that might differ from the National one in some way; written or unwritten.)
- How does external compliance assistance (e.g., presentations) work into the overall strategy?
- What are the roles of the National office and the Regional offices in providing child labor compliance assistance and in distributing compliance assistance materials?
- What's the relationship between an investigation and the compliance assistance offered during an investigation? How do compliance assistance materials and investigations work together to affect compliance? Does the relationship differ depending on the type of investigation (i.e. general FLSA vs. child labor focused)?
- What materials are the most important ones that you provide?
 - In your opinion, what materials are the most effective? For employers? For parents and educators? What leads you to those conclusions?
 - If you were to recommend 3 publications for an employer to use to ensure its in compliance, what would those be?
 - If you were to recommend 3 publications for a parent or educators to use, what would those be?
- What are the most important CL initiatives that you undertake?
- What are the challenges to compliance faced by employers in your region?
- What is the most effective approach to ensuring compliance with CL laws?

Investigations

- Describe the investigation process.
 - How are employers selected for an investigation?
 - What sort of activities takes place prior to the investigation? Is the employer ever informed before the investigation occurs?
 - What sorts of activities take place before the investigation?
 - What sorts of activities take place after the investigation?
 - When is the employer informed about the results of the investigation?
 - Is there an appeals process? How often are investigations appealed?
- During an investigation, how does an investigator determine if a violation has occurred?
- Do investigators routinely review CL laws? Even for places where children are less likely to be employed?
- What are the challenges to uncovering child labor violations that investigators face? Are there any challenges specific to child labor?
- What sort of leeway does an investigator have in citing employers for violations for child labor violations? Are there cases where a violation is cited at one employer but not another (within a particular multi-establishment enterprise? Within an industry? Within a geographical area?)? What would lead to those differences in citations?
- Is there some criteria for determining what employers get which compliance assistance materials at the end of an investigation?
 - How are the materials distributed to the employers? Are they provided with hard copies or do the investigators suggest the materials?
 - Do you think the employers actually use the materials? Why?

- How are child labor initiatives/investigations planned from at the Regional level?
- In terms of child labor investigations, how does the approach for non-agriculture differ from agriculture?
- In your experience, what would you say are the main reasons that employers violate child labor laws?
- What sort of good practices by employers lead to compliance with child labor provisions?
- How do the Federal and state laws interact? Including the need for certificates. Does state enforcement/coverage differ much from state-to-state? Is the level of child labor enforcement generally on par with state enforcement of other labor protections (e.g. FLSA)?
- What are some of the limitations of the WHISARD data? Are there some things that are not entered or not entered consistently across Regions/District Offices/Investigators?