

**Written Testimony of  
Glenn Marshall, Commissioner  
Department of Labor  
Higher Education and Employment Advancement Committee  
March 13, 2012**

Good Morning Senator Bye, Representative Willis, Senator Boucher, Representative LeGeyt and members of the Higher Education and Employment Advancement Committee. Thank you for the opportunity to provide you with written testimony concerning **S.B. #383 AAC Manufacturing Internships.**

The Department of Labor's Office of Workforce Competitiveness, through the Connecticut Employment and Training Commission, had made the expansion of Connecticut's manufacturing workforce a priority. However, I am opposed to S.B.# 383 for several reasons. First, current law already provides for such internships. The current statute offers safe and legal opportunities for 16 and 17 year old student learners to participate in paid internships in manufacturing (as well as other career areas), as long as the appropriate safeguards are in place that protect the young workers in what are considered "potentially hazardous" worksites by both federal and state child labor laws. Student learners (ages 16 and 17) in a number of State Department of Education approved and structured work-based learning and career preparation programs are eligible for and are currently using a Department of Labor waiver that allows a minor sixteen years of age and over who is participating in a manufacturing internship to work in a manufacturing establishment. This Department of Labor waiver exempts these students from the state and federal labor laws' "hazardous orders" which prohibit minors (who are not enrolled in structured and approved educational programs) from working in potentially hazardous worksites or occupations. This waiver identifies the student minor as a participant in a work-based learning program. Without this waiver, the students may not participate in internships in what the Agency considers to be hazardous occupations.

Even if S.B.# 383 were to pass, federal Child Labor laws would supersede the language found in this bill because federal law does not allow minors to work in a manufacturing establishment to do so without a waiver. The federal laws would remain in effect, therefore, any change to the state laws would be pre-empted by the more protective federal law.

In Senate Bill # 383, the student learners are not placed in an approved, structured career program that prepares them for these internships. The proposed bill is unnecessary because there is already a law that permits such internships with appropriate safeguards. If this bill were to pass, our young workers may be exposed to potentially harmful worksites without adequate safeguards.

Second, the Department of Labor, through the work of our Office of Workforce Competitiveness, is expanding its youth and manufacturing internships so S.B.# 383 would be duplicative and unnecessary.

Thank you for the opportunity to provide this testimony and I am happy to discuss this further if you have additional questions.