



September 12, 2025

MEMORANDUM FOR: LAURA B. NICOLSI
Assistant Inspector General for Audit

FROM: JAMES R. MACY
Acting Administrator, Wage and Hour Division

SUBJECT: Response to the Office of the Inspector General's Draft Report:
Review of WHD Efforts to Address Child Labor Law Violation Challenges, Report No. 17-25-001-15-001

The U.S. Department of Labor's (Department) Wage and Hour Division (WHD) appreciates the opportunity to respond to the August 26, 2025 draft report of the Office of Inspector General ("OIG") titled *Review of WHD Efforts to Address Child Labor Law Violation Challenges*. This draft report examined WHD's efforts to address challenges associated with enforcing child labor laws under the prior Administration. WHD encountered a range of challenges in enforcing child labor laws, and WHD understands the OIG interest in this critical enforcement priority.

Combating egregious and exploitative violations of federal child labor laws is a high priority for this Administration. To strengthen efforts moving forward, WHD will consider observations from the OIG review and other factors that could explain the increase in child labor under the prior Administration. For example, in addition to the heightened focus on targeting child labor law violations, the significant number of undocumented and unaccounted for children that entered the country, as well as other child labor concerns, may help explain the increase in child labor violations.

WHD investigates all claims of illegal child labor brought to its attention and will continue to take seriously its responsibility to protect children from exploitation and harm from illegal child labor, including those children who are forced or asked to perform hazardous jobs. As Secretary Chavez-DeRemer said at her confirmation hearing, "I will do everything in my power within the Department of Labor to double down on the safety of all American workers that are exploited—but especially child labor".

WHD welcomes further discussion with the OIG regarding the current Administration's strategies and actions in addressing compliance with child labor laws.

Thank you again for the opportunity to comment on this report.

Cc: Patricia Davidson
Deputy Administrator

Michael Kravitz
Associate Administrator, Office of Performance and Communications

Karen Livingston
Director, Division of Strategic Planning and Performance

Jason Coker
WHD Audit Program Manager