U.S. Department of Labor

Wage and Hour Division
Washington, DC 20210

October 30, 2026

MEMORANDUM FOR: Sean Gilkerson
Assistant Inspector General for Audit (Acting)

FROM: Andrew B. Rogers
Administrator, Wage and Hour Division

Andrew B. Rogers Digitally signed by Andrew B. Rogers
Date: 2026.10.30 13:20:08 -04'00'

SUBJECT: Response to the Office of the Inspector General's Draft Report: WHD's Inter-Agency Collaboration, Targeting, and State Monitoring Procedures Could be Enhanced and Strengthened to Better Protect Minor Workers

The Wage and Hour Division ("WHD") appreciates the opportunity to respond to the draft report of the Office of Inspector General ("OIG") titled *WHD's Inter-Agency Collaboration, Targeting, and State Monitoring Procedures Could be Enhanced and Strengthened to Better Protect Minor Workers*. The report provides six recommendations, and WHD's responses to these recommendations are set forth below.

Combating egregious and exploitative violations of federal child labor laws is one of the highest priorities for WHD. 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. WHD values the role of the OIG in identifying internal controls that could maximize the agency's limited resources and positively impact overall program performance. The Division agrees with the recommendations presented in this report and will take steps to strengthen procedures in the identified areas.

Recommendation 1: Update procedures to ensure all required referrals are made directly to the federal office responsible for child labor trafficking and within required timeframes. Updated procedures should include clearly identifying employers suspected of child trafficking and documenting the reasons when referrals are not made.

Response: WHD agrees with the recommendation. WHD will take additional steps to ensure that legally required referrals are made within required timeframes. Where WHD has received enough information to identify employers suspected of child trafficking and has sufficient information to identify the potential minors who may be a victim of child trafficking, it will document the referral made or the reasons why a referral is not made.

Recommendation 2: Establish a schedule for updating the status of Anti-Trafficking Coordination Team and human trafficking task forces with WHD participation to ensure WHD is participating in active collaborative efforts, as appropriate.

Response: WHD agrees with the recommendation. WHD will establish a schedule for updating the status of active human trafficking task forces with WHD participation, as appropriate.

Recommendation 3: Strengthen practices and procedures, including the use of emerging technology, for systematically analyzing data sources that could further inform case selection and strategies for detecting violations of child labor.

Response: WHD agrees with the recommendation. WHD has a longstanding practice of identifying and using multiple data sources to plan and prioritize investigations. WHD will determine how those practices can be strengthened through technology and procedures.

Recommendation 4: Aggregate data to identify trends and emerging compliance issues around child labor.

Response: WHD agrees with the recommendation. WHD will review and strengthen current practices and procedures for systematically reviewing and analyzing information to identify emerging compliance issues around child labor.

Recommendation 5: Establish procedures to regularly identify and assess revisions to state child labor laws.

Response: WHD agrees with the recommendation. Although WHD does not have the authority to administer or enforce state child labor laws, WHD researches, tracks, and monitors state child labor laws, and strives to update its webpages accordingly when it becomes aware of updates to these laws. WHD will review its existing processes and identify specific areas of improvement.

Recommendation 6: Regularly update state child labor laws on WHD webpages to clearly delineate state and federal requirements.

Response: WHD agrees with the recommendation. Although WHD does not have the authority to administer or enforce state child labor laws, it provides information regarding state child labor laws on its website as a general compliance assistance resource for the public. However, these webpages are not designed to provide a comprehensive or detailed analysis or interpretation of state law. WHD advises the public to consult with applicable state government sources for questions or details about a particular state's laws. WHD will review its webpages and identify specific areas of improvement.

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

Cc: Dieera Fitzgerald
Deputy Administrator

Michael Kravitz
Deputy Administrator

Edwin Nieves
Acting Associate Administrator, Office of Performance and Communications