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United States Senate

COMMITTEE ON HEALTH, EDUCATION,
LABOR, AND PENSIONS

WASHINGTON, DC 20510-6300

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January 22, 2024

VIA ELECTRONIC TRANSMISSION

Robert C. Bullard
Chief Executive Officer
QSI Sanitation
412 Georgia Avenue
Suite 300
Chattanooga, Tennessee 37403

Dear Mr. Bullard:

I write regarding the U.S. Department of Labor's (DOL) reported investigation into QSI, Inc.'s (QSI) hiring practices for positions that conduct dangerous chemical cleaning and sanitation services, as well to determine what steps QSI has taken or is taking to ensure it does not illegally employ minor children in dangerous or hazardous positions.¹ Although QSI has not been at the center of alarming reports documenting horrific injuries and conditions hundreds of children have been allowed to endure, DOL's investigation into QSI necessitates further inquiry into QSI's on-the-ground experience and action(s) to ensure compliance with federal child labor laws.

As you are aware, QSI is not the only company being investigated for allegations of unlawful child labor practices.² The issue of illegal child labor has recently been exposed throughout the meat-packing and chemical sanitation industry, and has resulted in a significant increase in child labor enforcement actions, fines from DOL ranging in the millions of dollars, and court orders to individual companies to cease and desist all illegal child labor violations.³ This increase in this

¹ Hannah Dreier, *Tyson and Perdue Are Facing Child Labor Investigations*, NEW YORK TIMES (Sept. 23, 2023), <https://www.nytimes.com/2023/09/23/us/tyson-perdue-child-labor.html>; Aislinn Murphy, *Tyson Foods, Perdue Farms Seeing Scrutiny from Labor Department*, FOX BUSINESS (Sept. 25, 2023), <https://www.foxbusiness.com/markets/tyson-foods-perdue-farms-seeing-scrutiny-department-labor>; *Tyson and Perdue Face Child Labor Investigations*, *New York Times Reports*, REUTERS (Sept. 23, 2023), <https://www.reuters.com/business/tyson-perdue-face-child-labor-investigations-new-york-times-2023-09-23/>.

² See Hannah Dreier, *Tyson and Perdue Are Facing Child Labor Investigations*, NEW YORK TIMES (Sept. 23, 2023), <https://www.nytimes.com/2023/09/23/us/tyson-perdue-child-labor.html>; Kate Gibson, *Tyson Foods and Perdue Farms Face Federal Probe Over Possible Child Labor Violations*, CBS NEWS (Sept. 25, 2023), <https://www.cbsnews.com/news/child-labor-tyson-foods-perdue-farms-labor-department-investigation/>.

³ *Child Labor Enforcement: Keeping Young Workers Safe*, U.S. DEP'T OF LAB., <https://www.dol.gov/agencies/whd/data/child-labor#:~:text=In%20FY%202023%2C%20we%20concluded,increase%20from%20the%20previous%20year> (last visited Nov. 27, 2023); *Julie Su, Acting Sec'y of Lab. v. Monogram Food Sol. et al*, No. 23-cv-2007 (July 6, 2023)

industry alone raises serious questions about the meat packing industry's business practices, and the ways Congress can ensure all children—especially those who immigrated to the United States and are particularly susceptible to the harms of working under dangerous conditions—receive the protection they deserve.

Earlier this year, Senator Bernie Sanders and I sent a letter to Packers Sanitation Services, Inc. (PSSI) following reports that PSSI employed more than 102 children between 13 to 17 years of age in hazardous conditions and had them working overnight shifts at meat processing facilities. In furtherance of this effort to examine the meatpacking industry, and to better understand the steps QSI has taken and intends to take to ensure that it does not illegally employ child laborers in its dangerous and hazardous workplaces, I ask that you answer the following questions, on a question-by-question basis, by February 5, 2024. For those questions that require the production of documents, we request that these documents be unredacted and produced in electronic form.

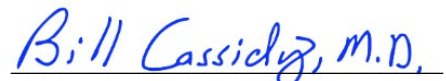
1. Has QSI amended any of its policies and procedures since January 1, 2022 to ensure all employees are of legal age and/or eligible to work in the particular job they are hired into? If so, what amendments were made? In addition to answering this question, please produce the following documents:
 - a. A copy of all QSI document retention policies for maintaining and preserving employee records in place since January 1, 2022;
 - b. If all QSI locations do not follow the same document retention policies, please explain why.
2. Does QSI offer trainings for its managers relating to its compliance with child labor law provisions of the Fair Labor Standards Act (FLSA)? If so, how have those training materials changed since January 1, 2022, if at all?
 - a. In addition to answering this question, please produce a copy of QSI's training materials for all managers that relate to compliance with child labor law provisions of the FLSA.
3. What steps does QSI take to ensure that, in the event it hires minors to work at any of its locations or facilities, those minors do not work in prohibited and/or hazardous locations or perform prohibited and/or hazardous tasks that would violate federal labor law?
 - a. In addition to answering this question, please produce a copy of all QSI policies that relate to hiring and/or employing minors at any QSI location or facility.
 - b. If all QSI locations do not follow the same policies and procedures for hiring and/or employing minors, please explain why.

4. Has QSI taken any adverse employment actions against current or former managers since July 1, 2022 related to violations of the child labor provisions of the FLSA? If so, please provide the following information:
 - a. The location(s) where the management personnel was employed;
 - b. The nature of the violation and adverse action taken; and
 - c. The date QSI took the adverse employment action.

5. What policies, procedures, and/or other system(s) does QSI use to confirm the eligibility of their employees to work in the United States?
 - a. If QSI uses E-Verify and/or other web-based systems, does QSI ensure that management personnel do not misuse these systems or engage in unreported employment? If so, how?

Thank you for your prompt attention to this matter.

Sincerely,


Bill Cassidy, M.D.
Bill Cassidy, M.D
Ranking Member
U.S. Senate Committee on Health
Education, Labor, and Pensions