



QUICK REFERENCE GUIDE

FIREFIGHTER PATHWAY PROGRAMS

Many PACE members are implementing career pathway programs that give high school students hands-on experience in various professions, including firefighting. These programs offer valuable learning opportunities but also come with important safety and liability considerations.

Child Labor Laws & Regulatory Oversight

A key area of concern is compliance with Oregon Bureau of Labor and Industries (BOLI) Child Labor Laws. Although firefighter pathway programs are typically categorized as educational programs, enforcement authority can be ambiguous. OSHA has clearly stated it will enforce child labor laws if students are considered “subject workers.” School staff are unquestionably subject to OSHA requirements, and while BOLI tends to focus on remuneration as a trigger for enforcement, liability could still arise even in unpaid programs.

PACE strongly recommends complying with BOLI child labor laws whenever feasible to reduce exposure to legal claims, especially in the event of injury. A creative attorney could easily cite these laws in a liability suit.

Participant Age Considerations

Generally, 16 years of age is the minimum for students to begin engaging in activities that count toward certifications and licenses. While full certification typically becomes available at age 18, many regulatory bodies, including those in firefighting, accept training hours starting at 16. The Oregon Health Authority is the only agency that permits students younger than 18 to apply for an Emergency Medical Responder (EMR) certificate.

Best practice: Do not include students under the age of 16 in firefighter training programs. There is little to no educational or safety benefit for younger participants and doing so may expose the district to unnecessary risk.



Clear Expectations & Supervision

Successful and safe programs rely on clearly defined expectations and robust supervision. Work with your legal counsel to create:

- A program handbook
- A parent/guardian agreement detailing program hazards and mitigation strategies

Because this training occurs in an educational environment, there should be zero tolerance for unsafe behavior or preventable injuries. All activities should be designed to eliminate or control foreseeable hazards. If a “reasonable person” could identify a safety issue, it must be addressed in advance.

Partnering with Fire Agencies or Private Industry

If your district partners with a fire department or private entity, establish a written agreement outlining responsibilities, liability and risk transfer provisions. PACE has sample agreements available upon request.

Key elements should include:

- Indemnification language
- Insurance requirements

Screening Program Leaders and Volunteers

All program staff and volunteers must be vetted using your district's standard background check process. Ensure they are also trained on:

- Oregon's sexual conduct laws
- Relevant district policies and expectations
- Set clear expectations around:
- Safety protocols
- Electronic communication boundaries
- Prohibition of one-on-one contact with students

These measures help protect students and reduce your district's liability.

Specific Risk Areas

Even though BOLI may not actively enforce child labor laws in educational settings, they still provide a useful legal framework for managing program risk. The following activities warrant special caution:

Ladders

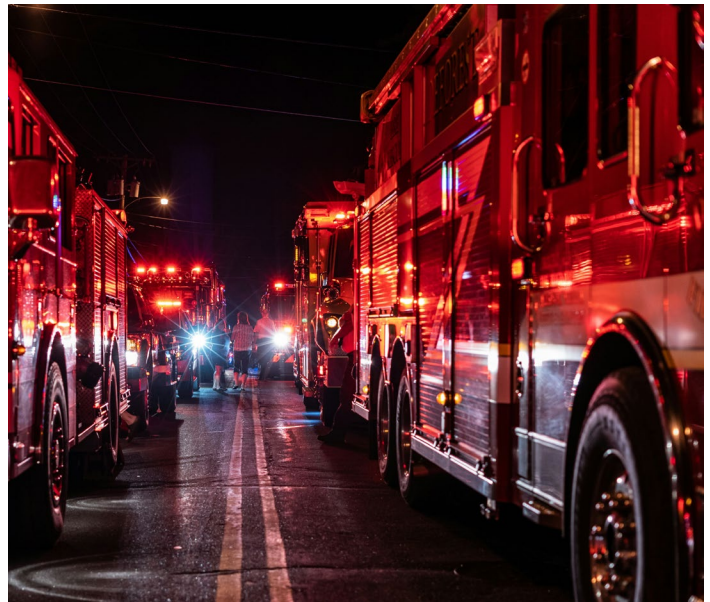
- Training should include ladder setup and use.
- Consider using a belay system to protect students from falls, especially during early attempts.
- Constant adult supervision is critical.

Powered Saws

- Emphasize inspection, proper use and PPE.
- Provide comprehensive instruction before use.
- Ensure multiple adults are present during operation to intervene if safety is compromised.

IDLH Atmospheres (Immediately Dangerous to Life or Health)

- Do not expose minors to IDLH or hazardous atmospheres. These environments offer no educational value for high school students.
- Use fire extinguisher props under close supervision for live fire training, if needed.



Self-Contained Breathing Apparatus (SCBA) or Respirators

- Students should not use functional SCBA, or respirators intended for IDLH entry.
- If demonstration is necessary, use inert units that allow unrestricted room air flow.
- If functional use is required, the district must follow [OSHA's respiratory protections regulations](#).

Driving

- Students should not drive vehicles on public roads.
- If driving is part of the training, it must occur on a closed course with immediate adult intervention available.

By proactively addressing these safety and liability considerations, school administrators can help ensure that firefighter pathway programs offer meaningful, hands-on learning experiences while keeping students safe and minimizing district risk. For further guidance or sample agreements, contact the [PACE Risk Management Team](#).

PACE RISK MANAGEMENT

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