

## **Educational Assignments in Laboratories and/or Other Research Activities**

**Section:** U

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### **Purpose:**

The University of Chicago (UChicago) is committed to providing a safe and secure environment for minors and adults (Educational Assignees) who participate in University programs and activities. This policy is intended to provide guidelines to Principal Investigators (PI) and departments, committees and institutes on the health and safety requirements for minors and adults participating in a University-sponsored Educational Assignment occurring within research laboratories. Explicitly excluded from this policy are individuals enrolled as human research participants in a protocol review by a UChicago Institutional Review Board (IRB). This policy, as it relates to all individuals working in research laboratories supplements and amends the previous guidance provided in University policy [Volunteer Services](#).

### **Policy:**

PIs and supervisors have a fundamental responsibility and accountability to ensure the safety of all individuals in research laboratories. All individuals in research labs need to be either participating in an Educational Assignment or be enrolled in a UChicago degree-granting program. To provide a safe working environment, the following guidelines apply to Educational Assignments in research laboratories:

1. All persons directly supervising minors must comply in full with the Policy on the Safety of Children in University Programs, including DCFS mandated reporter training, background check, and submission of signed Acknowledgements included within the Policy.
2. Minors under the age of 14 are not permitted in University research laboratories, unless participating in an organized tour of laboratory facilities at a time during which no active research is underway.
3. In addition, minors between the age of 14 and 17 may access University research laboratories only as participants in approved Educational Assignments.
4. All Educational Assignees must always be directly supervised while in a research laboratory, either by the PI or a University supervisor designated by the PI and sanctioned by the University. (It is not appropriate for an undergraduate student to supervise minors; however appropriately trained and experienced graduate students may serve as supervisors of minors.)

5. All PIs must complete a ***Proposal for an Educational Assignment or Other Research Activity*** form and submit to Human Resources at least one month before the beginning of the assignment.
6. For all minors participating in an Educational Assignment, **Parental Consent** must be obtained, and **Emergency Contact Information** must be provided. These requirements are satisfied via completion of the ***Proposal for an Educational Assignment or Other Research Activity*** form.
7. A laboratory inspection and safety training must be completed before the Educational Assignee begins the Educational Assignment.
8. Educational Assignees are not permitted to access to laboratories unless they wear clothing appropriate for the work assignment and work environment, as specified by the PI.
9. All Educational Assignees are required to use appropriate personal protective equipment (PPE) when working in a research laboratory. The PPE is to be provided by the responsible PI or University supervisor designated by the PI.
10. Educational Assignees are prohibited from working with the following hazardous materials or in the following hazardous environments:
  - i. Entering BSL3 laboratories or ABSL3 animal facilities;
  - ii. Entering Select Agent registered laboratories or SA animal facilities;
  - iii. Working in an area or performing activities requiring the use of a respirator;
  - iv. Handling Risk Group 3 pathogens;
  - v. Operating Class III Lasers;
  - vi. Working in areas with possible exposure to lead or its compounds;
  - vii. Working with substances present on the OSHA particularly hazardous substances list;
  - viii. Working in areas where explosives or articles containing explosive components are used or stored;
  - ix. Working in a Machine Shop;
11. Educational Assignees are restricted\* when working with the following hazardous materials or in the following hazardous environments:
  - i. Performing work involving the handling or storage of blood, blood products, or body fluids or tissues;
  - ii. Handling Risk Group 2 organisms;
  - iii. Working with carcinogens, teratogens, or mutagens;
  - iv. Handling radioactive substances;
  - v. Using radioactive devices;
  - vi. Entering animal research facilities;
  - vii. Working with animals.

\*Appropriate training and supervision must be provided prior to these activities being initiated.

## **Definitions:**

***Educational Assignment:*** A structured learning opportunity for an individual with a defined and reasonable set of goals, mentored oversight, and that requires personal initiative by the individual, where the opportunity primarily is for the benefit of the individual and not others. Educational assignments do not include individuals enrolled in UChicago degree-granting programs nor does it include individuals enrolled as human research participants in IRB protocols.

***Educational Assignee:*** Any individual participating in an Educational Assignment or other research activity solely for an educational experience and not receiving payment or credit from UChicago or their home institution.

***Minor:*** A minor is a person under the age of eighteen who is not in the laboratory setting by virtue of being enrolled in a University credit-granting course.

***Research Laboratory:*** An area where hazardous materials, such as chemicals, biological materials, and radiological materials, are used. Additional hazards, such as high voltage power supplies, high power lasers and other equipment or process hazards may also be present.

***Stipend:*** Compensation, modest in amount and not exceeding a reasonable estimate of the expenses incurred by the Educational Assignee because of participation in the educational experience, e.g., transportation expenses, parking, etc.

***Supervision:*** Provide continual instruction and oversight of the Educational Assignee(s).

## **Supervision & Training:**

The PI has primary responsibility and accountability for the health and safety of all staff, including Educational Assignees, working or learning in his/her laboratory and must ensure compliance with the following:

1. **Supervision:** Educational Assignees are always required to be supervised either by the principal investigator or his/her University designee and are not permitted to be alone in the laboratory. Undergraduate University students cannot be solely responsible for an Educational Assignment and cannot serve in a supervisory capacity. The PI may delegate daily supervision of the Educational Assignees to a trained and knowledgeable supervisory representative. However, the PI retains primary responsibility of ensuring that the supervision is provided. Additionally, the PI is required to provide and enforce the correct use of personal protective equipment (PPE), appropriate laboratory engineering controls, and work practices. Proper supervision of an Educational Assignees should extend outside the laboratory setting and occur while the Educational Assignee is in University facilities.

2. Training: Educational Assignees are required to complete in-person laboratory safety training and other laboratory-specific training as appropriate before beginning any laboratory assignment.

Training is provided by the [Office of Research Safety](#) and is required to ensure regulatory compliance with agencies such as the Occupational Safety and Health Administration, the Nuclear Regulatory Commission, the National Institutes of Health and the Centers for Disease Control and Prevention. Laboratory specific training is required for Educational Assignees and is to be conducted in partnership with the PI or designated supervisory laboratory personnel and the [Office of Research](#).

All laboratory specific training provided to the Educational Assignees must be documented and retained by the Principal Investigator, PI designee or departmental HR Partner.

3. Chemical Hygiene Plan: All laboratories engaged in the laboratory use of hazardous chemicals or any other facility which operates on a laboratory scale shall become familiar with and adhere to the requirements stated in the [Chemical Hygiene Plan](#) and all related laboratory safety programs as described in laboratory safety manuals.
4. Bloodborne Pathogens Plan: All laboratories engaged in the laboratory use of potentially infectious human derived materials shall become familiar with and adhere to the requirements stated in the [Bloodborne Pathogens Plan](#) and all related laboratory safety programs as described in laboratory safety manuals.

#### **Additional Guidance:**

- The University prohibits the employment of any minor under the age of sixteen, whether paid or unpaid. Questions regarding the employment of minors should be referred to Human Resources.
- The University does not intend for volunteers or Educational Assignees to perform or displace work that is presently being performed by University employees. Volunteer arrangements may not be used to circumvent the established processes that govern standard, University-authorized hires.
- If an Assignee receives wages as compensation for his/her work associated with his/her assignment/appointment, the individual is classified as, and must be hired as, a Temporary Employee through Workday® and all related processes must be approved. This appointee is no longer considered an Educational Assignment. Compensation must fall within the established salary range defined by policy [Compensable Time and](#)

[Compliance with the Fair Labor Standards Act \(Overtime\)](#) for additional pay practices and procedures governed by FLSA.

- For Educational Assignees who receive stipends, the stipend amount must be modest in amount and not exceed a reasonable estimate of the expenses incurred by the Educational Assignee because of participation in the educational experience, e.g., transportation expenses, parking, etc.

		<b>Employee Relationship</b>	<b>Age</b>
Paid	Temporary Employment	Yes	16 yrs. or older
Stipend	Educational Assignment with stipend	No	14 yrs. or older
Unpaid	Educational Assignment	No	14 yrs. or older

- This policy does not apply to general public events where parents and guardians are invited and expected to provide supervision of minors or to events where parents and guardians are explicitly required to accompany their children.
- **For educational experiences that involve hosting a laboratory tour, one copy of the *Proposal for an Educational Assignment in a Laboratory or Other Research Activity* form must be completed for the tour group and submitted to Human Resources at least two weeks before the tour is scheduled to take place. A class roster, listing all names of tour participants and a Parental Consent (page 5 of *Proposal for an Educational Assignment in a Laboratory or Other Research Activity* form) for each individual is to be submitted to [elrelations@uchicago.edu](mailto:elrelations@uchicago.edu).**

**Incident Reporting:**

Any incident or accident involving an Educational Assignee is required to be reported to the Office of Risk Management, Environmental Health and Safety and the Office of Research Safety immediately. After treating, reporting can be done using the University’s Accident and Incident Reporting System (UCAIR) at [ucair.uchicago.edu](http://ucair.uchicago.edu). Please make sure you call 123 (on-campus phone) or 773.702.8181 (off-campus phone) for accidents to ensure the appropriate emergency response personnel are notified first.

*Documentation:*

*Notifications:* The PI is required to immediately notify his/her department of any laboratory incident involving an Educational Assignees. Immediate after departmental notification, the PI or supervisor is required to notify the Assignee’s parent/legal guardian if the Educational Assignee is a minor.

### **Medical Treatment:**

The Educational Assignee or minor's parent or guardian is responsible for the cost associated with any medical treatment provided as the result of a laboratory illness or injury.

- Non-serious injury/illness: Treatment should be coordinated by the Educational Assignee's personal care provider.
- Serious injury/illness: Treatment shall be immediately arranged at the University of Chicago Medical Center emergency department or at the nearest emergency department.

### **Discipline:**

1. Violations of this policy by PIs or supervisors may result in termination of the Educational Assignment and/or termination of PI's or supervisor's privilege to have Educational Assignees work in laboratories.
2. Educational Assignees will be disciplined for the following: violating this policy; violating supervision rules; failure to use appropriate PPE; failure to wear appropriate clothing for laboratory work; failure to satisfactorily perform the Educational Assignment.
3. Discipline for violation of this policy shall depend upon the severity of the violation and can be in the form of a verbal warning, a written reprimand and warning, along with a notice sent to the parent or guardian (if a minor) or expulsion or loss of laboratory privileges of the Assignee.