



Minors in Educational Assignments in Laboratories and/or Other Research Activities

Date: March 26, 2019

Prior Version Date(s): March 28, 2016

Purpose:

The University of Chicago (UChicago) is committed to providing a safe and secure environment for minors 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 participating in a University-sponsored Educational Assignment occurring within research laboratories. Explicitly excluded from this policy are minors enrolled as human research participants in a protocol review by a UChicago Institutional Review Board (IRB). This policy, as it relates to minors working in research laboratories supplements and amends the previous guidance provided in University policy **210 – Volunteer Services**.

Policy:

PIs and supervisors have a fundamental responsibility and accountability to ensure the safety of all minors in research laboratories. All minors 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. Minors must be directly supervised at all times 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 an ***Proposal for an Educational Assignment of a Minor in a Laboratory or Other Research Activity*** form and submit to Human Resources at least two weeks before the beginning of the assignment.
6. **Parental Consent** must be obtained and **Emergency Contact Information** must be provided for all minors participating in an Educational Assignment. These requirements are satisfied via completion of the ***Proposal for an Educational Assignment of a Minor in a Laboratory or Other Research Activity*** form.
7. A laboratory inspection and safety training must be completed before the minor begins the Educational Assignment.
8. Minors 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 minors 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. Minors aged 14-17 years old 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 in areas where explosives or articles containing explosive components are used or stored;
 - viii. Working in a Machine Shop;
11. Minors aged 14-17 years old 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 hazardous chemicals;
 - 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 a minor with a defined and reasonable set of goals, mentored oversight, and that requires personal initiative by the minor, where the opportunity primarily is for the benefit of the minor and not others. Educational assignments do not include minors enrolled in UChicago degree-granting programs nor does it include minors enrolled as human research participants in IRB protocols.

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.

Supervision: Provide continual instruction and oversight of the minor.

Supervision & Training:

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

1. **Supervision:** Minors are required to be supervised at all times 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 minor 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 a minor should extend outside the laboratory setting and occur while the minor is in University facilities.
2. **Training:** Minors are required to complete 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 minors 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 minor 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 volunteer minors 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.
- In special instances, with prior written authorization of HR, minors may receive wages or an educational assignment stipend.
 - The minor who receive wages must be hired as a temporary employee through Workday® and all related processes must be approved. Compensation must fall within the established salary range defined on the form. See [304 – Compensable Time and Compliance with the Fair Labor Standards Act \(Overtime\)](#) for additional pay practices and procedures governed by FLSA.
 - For minors who receive stipends, the stipend amount must be modest in amount and not exceed a reasonable estimate of the expenses incurred by the minor student because of participation in the educational experience, e.g., transportation expenses, parking, etc.

	Employee Relationship	Age
Paid	Temporary Employment	Yes

Paid	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.

Restricted Activities:

If the proposed research for a minor includes a restricted activity that is described below, please contact the Office of Research.

Minors aged 14-17 years old are restricted* when working with the following hazardous materials or in the following hazardous environments:

1. Performing work involving the handling or storage of blood, blood products, or body fluids or tissues;
2. Handling Risk Group 2 organisms;
3. Working with carcinogens, teratogens, or mutagens;
4. Handling radioactive substances;
5. Using radioactive devices;
6. Entering animal research facilities;
7. Working with animals;
8. Work involving access to information covered by HIPPA.

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

Incident Reporting:

Any incident or accident, including those involving a minor or visiting scholar or scientist engaged in an *educational assignment* (see above), is required to be reported to Environmental Health and Safety and the Office of Research Safety immediately via the UChicago Accident and Incident Reporting (UCAIR) System (<https://ehs-prd-01.uchicago.edu/ehsa-ucair/InjuryIllnessIndexUOFC-IT.html>).

Documentation: The reporting of an accident or incident via UCAIR fulfills the reporting requirement from the perspective of EHS and ORS. However, additional reporting through UChicago Human Resources (HR) will be required if the injured parties are employees of the UChicago. Workman's Compensation information and other HR documentation can be found here: <http://humanresources.uchicago.edu/benefits/timeoff/leaves/workerscomp.shtml>.

Notifications: In addition to the reporting through UCAIR described above, the PI is required to immediately notify his/her department of any laboratory incident involving a minor. Immediate after departmental notification, the PI or supervisor is required to notify the minor's parent/legal guardian.

Medical Treatment:

The 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 minor'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 minor's Educational Assignment and/or termination of PI's or supervisor's privilege to have minors work in laboratories.
2. Minors 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 or expulsion or loss of laboratory privileges of the minor.