This Policy is issued by Environment, Health & Safety (EHS) in collaboration with Risk Management Services to provide guidance and consistency in management of minors in research.

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Attachments:
- Appendix A Project Checklist for Minors Performing Research in Laboratories
- Appendix B U-M Informed Consent and Authorization Form

SUMMARY: Unsupervised volunteers and visitors, including minors, create a risk for injury and increased liability for the University. EHS requires that a responsible person appointed by the Chair or Department Head directly supervise all minors when they enter a laboratory to work or for a visit. Departmental policy to this effect will reduce or eliminate the risk of personal injury to minors in research laboratories, and the risk of damage to projects and property.

Additionally, there are other university policies and procedures that must be adhered to when minors are involved. This policy addresses those requirements for a comprehensive resource for university departments to reference.

SCOPE: This Policy applies to all academic, clinical and service units involved in research operations involving minors. This does not apply to minors enrolled as U-M students.

Volunteers for the UM Health System must refer to Volunteer Special Placement Application through Volunteer Services. For non-minors
visiting or volunteering in research operations, refer to EHS Guideline for Visitors and Volunteers in Research Facilities.

DEFINITIONS:  

*Chemical Hygiene Plan* – U-M Chemical Hygiene Plan is a written program that applies to all research, teaching, student and other laboratories at UM covered by the MIOSHA Hazardous Work in Laboratories Standard.

*Department Head* – This individual holds authority over a Primary Investigator or other researcher and is in a position to review requests for visits. This raises the approval level beyond the individual lab or research facility.

*Minor* – A person under 18 years of age who is not enrolled in a degree program at U-M. Policies apply whether minor is employed or volunteering to work.

*PI* – Principal Investigator for a research activity.

*PPE* – Personal Protective Equipment.

*Research Operations* – includes any space within a UM building as well as research conducted in field locations on behalf of the UM. Includes activities where clinical, research, production or laboratory support operations are conducted as well as space where research animals are housed or supported.

*Responsible Person* - any person approved by a Lab Director or Department Head to oversee and/or supervise the activities of a visitor/volunteer while in the research facility.

RESPONSIBILITY: Deans, Directors and Department Heads

- Actively support this Policy within individual units.
- Review and Approve Requests for minors observing and working in UM Research Facilities.
- Ensure individuals responsible for minors follow all requirements in SPG 601.34 Policy on Minors Involved in University-Sponsored Programs or Programs Held in University Facilities.
Supervisors/PI’s

- Follow and Implement procedures in accordance with this Policy to obtain approvals as required for minors and maintain documentation of approvals.
- All responsible persons for minors must follow all requirements in SPG 601.34 Policy on Minors Involved in University-Sponsored Programs or Programs Held in University Facilities.
- Provide ongoing supervision of all minors. Designate a qualified laboratory supervisor and an alternate supervisor, if necessary.
- Never allow a minor to conduct research activities without direct supervision at all times.
- Ensure minors receive training and maintain documentation of the training.
- Ensure minors are provided with PPE as required for their work.
- Contact EHS to request training, technical assistance, and to evaluate health and safety concerns within their unit.

EHS

- Review and approve minors working in research facilities.
- Provide technical assistance to research operations regarding allowing minors into research areas.
- Prepare and provide access to training tools for the research operations.

PROCEDURES: Observation-only visits or work in a laboratory that does not involve hazardous materials or equipment.

- Approval Process-
  1. Anyone wishing to bring a minor into research facilities must first seek approval per their Department’s procedure.
  2. In general, children without a valid reason should not be permitted in research facilities.
  3. Refer to SPG 601.34 Policy on Minors Involved in University-Sponsored Programs or Programs Held in University Facilities. Specific requirements regarding program registration, code of conduct, background screening, training and reporting requirements apply to minors working or volunteering in research facilities. Additional resources can be found at U-M website for Children on Campus.
     a) All activities involving minors must be registered.
     b) All individuals that will be supervising a minor must having training and background checks.
• PPE Requirements: Minors must be provided with appropriate PPE as needed based on work activity underway in the laboratory. At a minimum, safety glasses, long pants and closed-toe shoes must be worn.

• Training: Observation only minors must receive a brief discussion of potential hazards that may be encountered in the laboratory during their visit and procedures to follow in the event of an emergency.

Minors Performing Research Activities (Volunteer or Employed) involving hazardous materials or equipment

• General:
  1. If a minor is to be employed refer to U-M SPG 201.20 Employment of Minors for a listing jobs and titles that have State Department of Labor approval for minors. Fourteen is the minimum age for legal employment.
  2. Minimum age for volunteering is recommended to be sixteen.
  3. Chemicals – minors are not allowed to use or be exposed to any hazardous substance which means a contaminant, substance, mixture of substances which is toxic, corrosive, an irritant, a strong sensitizer, or flammable or which generates pressure through decomposition, heat, or other means, if the substance or mixture of substances is capable of causing substantial personal injury, impairment, or substantial illness through absorption, inhalation, or personal contact.
     ▪ Substances as described above would be designated with the signal word “DANGER”.
  4. Biological Hazardous Substances - minors are not allowed to have potential exposure to any bloodborne pathogens.
  5. Radioactive Materials – Use of radioisotopes and/or radiation-producing equipment have dose limitations for minors. Use must be approved through EHS-RSS.
  6. Animal Use – PI’s may apply for an exception to the ULAM Director to allow a minor to work with lab animals under the direct supervision of an Authorized User approved by the University Care and Use Program (ACUP).
  7. Respirator Use – minors are not allowed to be assigned work task that require respiratory protection including:
     ▪ A self-contained breathing apparatus
     ▪ A supplied-air respirator
     ▪ An air-purifying respirator
     ▪ A gas mask
     ▪ A chemical cartridge respirator
8. Equipment Use – minors are not allowed to be assigned work tasks that involve the following types of equipment:
   - Power-driven wood-working machinery
   - Power-driven metal-forming, metal-punching, and metal-shearing machines.
   - Power-driven saws
   - Power-driven hoisting apparatus including a power industrial truck, crane, or hoist.

• Approval Process-
  1. Complete the attached Project Checklist for Minors Performing Research form. Obtain approval from your Department Head or Chair.
  3. Once all signatures are obtained as required, submit both forms for approval to EHS. Allow at least one week for Department Head or Chair approval and at least one week for EHS approval in advance of the planned visit. Additional time may be required if special approvals need to be obtained.
  4. Approval of the work must be received prior to the visit and it must be available to produce upon request.
  5. All minors who have not graduated from high school that are involved in paid employment must have a ‘work permit’ on or before the first day of work. Refer to SPG 201.20 Employment of Minors and consult your Department HR representative to ensure all requirements are met. Minors on volunteer status are not required to have a work permit.
  6. Refer to SPG 601.34 Policy on Minors Involved in University-Sponsored Programs or Programs Held in University Facilities. Specific requirements regarding program registration, code of conduct, background screening, training and reporting requirements apply to minors working or volunteering in research facilities. Additional resources can be found at U-M website for Children on Campus.
     a. All activities involving minors must be registered.
     b. All individuals that will be supervising a minor must have training and background checks.

• PPE Requirements: Minors must be provided with appropriate PPE as needed based on the work activity. At a minimum, safety glasses, long pants and closed-toe shoes must be worn. Laboratory coats and
other PPE deemed necessary by the hazardous materials or operations must be worn when directly using chemicals.

- **Training**
  1. Complete the [EHS Training Needs Assessment Tool](#) available on the EHS website for each individual preparing to work in the lab.
  2. EHS Student Laboratory Safety training or General Laboratory Safety training must be completed by each individual prior to using or being exposed to any hazardous materials or operations. Additional EHS training courses as deemed necessary by the training needs assessment must also be completed. The additional training may include:
     - Bloodborne Pathogens
     - Centrifuge Training
     - Autoclave Standard Operating Procedures
     - Laser Safety Basic Training
     - Radiation Safety
     - X-ray Diffraction
     - Shipping Regulations for Infectious Substances
     - Shipping Regulations for Shipping with Dry Ice
     - Shipping Regulations for Shipping with Chemical Preservatives
     - Working Safely with Viral Vectors

3. Lab-Specific Training provided by the PI must cover necessary work practices, procedures and policies to ensure that minors are protected from all potentially hazardous chemicals, biological pathogens and dangerous equipment used in the laboratory. Training on emergency procedures must also be included.

- **Medical Surveillance** may be a requirement depending on the type of research and work activities being conducted. Examples may include respiratory protection clearance for N95’s, animal use clearance, or audiograms for noise exposure.
  1. Consult with EHS on the need for medical surveillance.
  2. Individuals may be requested to show proof of current medical surveillance from another entity if they are visiting from an outside company or institution.

- **Recordkeeping**
  1. All Training must be documented and maintained in the research facility.
  2. The approved Project Checklist and Waiver forms must be maintained by the research facility for at least two years after the minor turns 18 years old.
Emergency Procedures – All near misses, injuries, accidents and illnesses must be reported. Appropriate medical treatment may be necessary. Determine what must be done for each minor and ensure all responsible persons are aware of the procedures.

1. For all incidents – Complete the Incidents and Near Miss Form and submit to EHS.
2. If Minors are employees, complete the Illness or Injury Report Form and submit to Work Connections. If medical treatment is required, follow same procedures as employees.
3. If minors are not employed, they should be referred to their own physician or the nearest emergency center depending on the nature of their issue.

RELATED DOCUMENTS:

U-M Standard Practice Guide (SPG) 605.01 - Safety, Health and Environmental Policy Policy

U-M SPG 201.2 – Employment of Minors

SPG 601.34 – Policy on Minors involved in University-Sponsored Programs or Programs held in University Facilities.

U-M Volunteer Guidelines

UMHS Volunteer Services Website

TECHNICAL SUPPORT:

Technical support will be provided by EHS (647-143), Risk Management Services (764-2200) and for UMHS, Medical Center Risk Management within the Office for Clinical Safety (764-4188)