



Minors in Research Operations

Policy

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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.

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Minors in Research Operations Policy Statement

Unsupervised volunteers and visitors, including *minors*, create a risk for injury and increased liability for the University of Michigan (U-M). Environment, Health & Safety (EHS) requires that a *responsible person (18 years of age or older)* 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.

All University of Michigan (U-M) employees **must** comply with the requirements contained in this document and complete all required training.

Minors in Research Policy

The Minors in *Research Operations* Policy is derived from the following U-M policies:

- [Children on Campus](#)
- [University of Michigan, Standard Practice Guide 201.20 - Employment of Minors](#)
- [University of Michigan, Standard Practice Guide 601.34 - Policy on Minors Involved in University-Sponsored Programs or Programs Held in University Facilities](#)
- [University of Michigan, Standard Practice Guide 605.01 - Safety, Health and Environmental Policy](#)

It provides guidance to reduce or eliminate the risk of personal injury to minors in research laboratories and the risk of damage to projects and property. The Minors in Research Program does not pertain to the following individuals:

IF THE INDIVIDUAL IS A ...	THEN REFER TO THE FOLLOWING WEB PAGE
Minors enrolled as U-M students	Not Applicable
Volunteer for Michigan Medicine	Michigan Medicine Volunteer Services
Non-minor visiting or volunteering	EHS Visitors & Volunteers

Related Minors in Research Operations Policy Documents

- [EHS Training Needs Assessment Tool](#)
- [Illness or Injury Report Form](#)
- [Incidents and Near Miss Form](#)

Additional Resources

All reference guidelines, regulations, and other documents are available in [Appendix A](#) of this document.

Observation-Only Visits

In general, children without a valid reason should not be permitted in research facilities. Minors participating as "observation-only" participants are not allowed to perform tasks that use hazardous materials or equipment. An example of an observation-only visit are when high school students tour a laboratory.

Approval Process

Anyone wishing to bring a minor into research facilities **must**:

1. Seek approval per their Department's procedure.
2. Refer to [University of Michigan, Standard Practice Guide 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.
3. Refer to the [Children on Campus](#) web page. This page provides resources necessary to complete the following requirements:
 - Registering all activities involving minors.
 - Completing training and background checks for all individuals that will be supervising a minor.

Personal Protective Equipment Requirements

Minors **must** be provided with appropriate personal protective equipment (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)

It is recommended that minors participating as volunteers are at least sixteen; fourteen is the minimum age for legal employment. If minors are participating in research activities as employees, refer to the [University of Michigan, Standard Practice Guide 201.20 - Employment of Minors](#) for a listing of jobs and titles that have State Department of Education approval for minors. The following table identifies work restrictions for minors participating in research activities.

HAZARDS	RESTRICTIONS
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".
Biological Hazardous Substances	Minors are not allowed to have potential exposure to any bloodborne pathogens.
Radioactive Materials	Use of radioisotopes and/or radiation-producing equipment have dose limitations for minors. Use must be approved through EHS-RSS.
Animal Use	<i>Lab directors</i> 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 Animal Care and Use Program (ACUP). Refer to the Institutional

HAZARDS	RESTRICTIONS
	Animal Care and Use Committee (IACUC) Policy on Tracking and Training Personnel Involved in Animal Activities .
Respiratory Use	Minors are not allowed to be assigned work task that require the following respiratory protection: <ul style="list-style-type: none"> • A self-contained breathing apparatus • A supplied-air respirator • An air-purifying respirator • A gas mask • A chemical cartridge respirator
Equipment Use	Minors are not allowed to be assigned work task that involve the following types of equipment: <ul style="list-style-type: none"> • 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.

Work Permits

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 the [University of Michigan, Standard Practice Guide 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. For more information about special requirements for minor as employees, refer to the Youth Employment Standards Act 90 of 1978, as amended.

U-M Policy and Procedure Documents for Minors on Campus

Read the following U-M policy and procedure documents to learn more about U-M policies and Department Head and Chair's responsibilities for ensuring minors are safe when under the responsible person's supervision:

- [University of Michigan, Standard Practice Guide 601.34 - Policy on Minors Involved in University-Sponsored Programs or Programs Held in University Facilities](#) to about specific requirements regarding program registration, code of conduct, background screening, training and reporting requirements apply to minors working or volunteering in research facilities.
- Refer to the [Children on Campus](#) web page about how to complete the following requirements:
 - Register all activities involving minors.
 - Complete training and background checks for all individuals that will be supervising a minor.

Approval Process

Approval of the work that minors are to perform **must** be received prior to the visit and it **must** be available to produce upon request.

1. Complete the attached [Project Checklist for Minors Performing Research](#) form. Obtain approval from your Department Head or Chair.
2. Complete the attached [U-M Informed Consent and Authorization for a Minor to Engage in Laboratory Research Activity](#) form. Obtain the minor's parent/guardian signatures.
3. After all signatures are obtained as required, submit both forms to the Department Head or Chair.
NOTE: Allow at least **one week** for the Department Head or Chair approval.
4. After obtaining the Department Head or Chair's signature, submit to EHS for approval.
NOTE: Allow at least **one to two weeks** for EHS to approve in advance of the planned visit. Additional time may be required if special approvals need to be obtained.

EHS will review the Project Checklist for Minors Performing Research form. Upon EHS approval, EHS will return the Project Checklist for Minors Performing Research form signed and dated along with a copy of the [Youth Employment Standards Act 90 of 1978, as amended Posting Requirement](#) from the Michigan Department of Education.

Personal Protective Equipment Requirements

Minors **must** be provided with appropriate personal protective equipment (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

EHS Student Laboratory Safety training or General Laboratory Safety training **must** be completed by each minor prior to using or being exposed to any hazardous materials or operations. Additional EHS training courses as deemed necessary by the training needs assessment, [What Training Do I Need](#), **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

Lab-Specific Training

Lab-Specific Training provided by the Lab Director **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

Medical surveillance may be required 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.

Consult with EHS about the need for medical surveillance.

Minors may be requested to show proof of current medical surveillance from another entity if they are visiting from an outside company or institution.

Recordkeeping

DOCUMENT	ACTION
Onboarding Forms <ul style="list-style-type: none"> Project Checklist for Minors Performing Research U-M Informed Consent and Authorization for a Minor to Engage in Laboratory Research Activity form 	<p>Must be maintained by the research facility for at least two years after the minor turns 18 years old.</p> <p>NOTE: These documents must be maintained by the research facility for at least two years after the minor turns 18 years old.</p>
Training Documentation	Documented and maintained in the research facility
Near Misses, Injuries, Accidents, and Illnesses Reports	Must be reported (for more information, refer the Emergency Procedures section)
Youth Employment Standards Act 90 of 1978, as amended Posting Requirement from the Michigan Department of Education	<p>Post conspicuously in areas where the minors work.</p> <p>NOTE: EHS will send a copy of this document along with the approved Project Checklist for Minors Performing Research form</p>

Emergency Procedures

All near misses, injuries, accidents and illnesses involving minors (regardless of level of participation) as observers or **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.

LEVEL OF PARTICIPATION	FORM TO COMPLETE	MEDICAL TREATMENT
<ul style="list-style-type: none"> Observer Volunteer performing research activities 	Incidents and Near Miss Form and submit to EHS	Refer minor to their own physician or the nearest emergency center depending on the nature of their issue.
Employee performing research activities	<ul style="list-style-type: none"> Incidents and Near Miss Form and submit to EHS Illness or Injury Report Form and submit to Work Connections 	Employed Minor: Follow same procedure as employees.

Appendix A: Referenced Documents

U-M

- [U-M Volunteer Guidelines](#)
- [UMHS Volunteer Services Website](#)
- [Risk Management Services](#)
- IACUC [Policy on Tracking and Training Personnel Involved in Animal Activities](#)

State of Michigan

- [Youth Employment Standards Act 90 of 1978, as amended Posting Requirement](#)

Federal Government

- [Child Labor Provisions for Nonagricultural Occupations under the Fair Labor Standards Act](#)

Appendix B: Roles and Responsibilities

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 [University of Michigan, Standard Practice Guide 601.34 - Policy on Minors Involved in University-Sponsored Programs or Programs Held in University Facilities](#).

Supervisors/Lab Directors

- 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 [University of Michigan, Standard Practice Guide 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.

Glossary of Terms

TERM	DEFINITION
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.
Lab Director	Lab director for a research activity.
Research Operations	Includes any space within a UM building as well as research conducted in field locations on behalf of the U-M. 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 (18 years of age or older) approved by a Lab Director or Department Head to oversee and/or supervise the activities of a visitor/volunteer while in the research facility.