Policy Governing Minors at University of Houston Laboratories

Overview:
The purpose of this document is to define and clarify policies pursuant to which Minors will be allowed to visit, access, participate and/or conduct academic research at the University of Houston (UH). As part of its mission of education and outreach, UH is committed to providing rewarding academic and research experiences to persons who are at least 15 but below 18 years of age, who may be visiting the campus under a mentorship program for educational purposes. This policy describes the requirements that must be fulfilled before the individual will be permitted to participate in laboratory activities. The objective of this policy is to protect the health and safety of the Minor and to prevent injury arising from a potential exposure to harmful agents or hazardous conditions.

Persons intending to visit the laboratory for more than one day for purposes of gaining academic or research experience should access the Minors in Laboratory Application Form at http://uh.edu/ehs/manuals_and_forms/minors-application.pdf.

Definitions:
Minor: Persons at least 15 but below 18 years of age.

Laboratory: For the purposes of this policy, “laboratory” refers to any part of the UH building used or intended to be used for scientific or technical activities which may involve hazardous materials or hazardous energy sources. These include teaching laboratories as well as research laboratories. Off-campus UH properties/facilities (e.g., Coastal Center, Energy Research Park, TMC-College of Pharmacy, etc), on-and off-campus clinical facilities, and fieldwork locations where the approved educational activity is conducted under the supervision of a Sponsor are also covered in this policy.

Sponsor: UH faculty member, Center Director or UH employee in a similar position who is directly responsible for administering the program under which the minor intends to take part in.

Sponsoring Department: UH Department where the program is administered.

EHLS: UH Environmental Health and Life Safety Bureau of the Department of Public Safety

IACUC: Institutional Animal Care and Use Committee

IBC: Institutional Biosafety Committee

IRB: Institutional Review Board

RSC: Radiation Safety Committee
Areas Affected by this Policy:
This policy applies to all laboratories at the University of Houston where hazardous materials, including but not limited to chemicals, radiation, biological agents and/or research animals are stored, used or disposed of or could potentially be present. Certain locations like mechanical rooms, machine shops, electrical rooms, equipment rooms and other areas with potential for unusual hazards should be taken into consideration as well.

General Guidelines:
- Minors are not permitted in a laboratory without obtaining written approval from the applicable University offices.
- Minors may apply to enter a UH laboratory as part of an educational research experience under the mentorship of a Sponsor using the “Minors Working in UH Laboratories Application Form”.
- The application must be completed by the Sponsor, forwarded to EHLS for review of activities and recommendations before being sent to the applicable Department Chair, or College Dean (or designee) for approval.
- The Release and Indemnification Agreement “Consent Form” must be completed and approved by the Vice President of Research and Technology Transfer and applicable Dean.
- All proposed activities to be conducted by a Minor at University of Houston laboratories must adhere to any requirements or restrictions imposed by the EHLS, the sponsoring department and other appropriate bodies within the University such as the IACUC, IBC, IRB and RSC.
- In addition, all required institutional trainings recommended by EHLS, sponsoring department, and/or program coordinator must be completed by the Minor prior to engaging in laboratory activities.
- The activities must be conducted under an appropriate supervisory plan developed by the Sponsor or designee and included in the application package.
- When approved, such activities may not last more than 6 consecutive months; a new application must be submitted if the activity exceeds 6 months.
- Minors are not permitted to work in high-risk laboratories such as those with particularly hazardous substances, radioactive material, biosafety level 2, etc.

Responsibility:
Sponsors or designees of the sponsoring laboratory or research group have primary responsibility to supervise all laboratory activities and to restrict activities, as necessary, depending on the nature of materials present in the laboratory (e.g. hazardous chemicals, research animals, radiological, biological, etc.). Responsibilities of the sponsor, the sponsoring department, the Minor, as well as (EHLS) are further defined in this policy.
**Sponsor:**
Faculty members and/or Research Center Directors sponsoring the “Minor” shall be responsible for the following:

1. Submitting completed Application Form and forwarding completed Release and Indemnification Agreement “Consent Form” from Minor to EHLS and applicable Department Chair for review, comments and approval.
2. Arranging, in consultation with EHLS for the Minor to obtain necessary safety trainings, well in advance, prior to commencement of proposed laboratory research activities.
3. Forwarding approved Application Forms to the department’s business office for the participant’s UH identification. Individuals approved for participation will be assigned PeopleSoft number and email address to facilitate identification, Cougar Card ID access and communication from appropriate UH departments.
4. Returning all approved documents to EHLS.
5. Arranging for (if needed), and ensuring payment for medical surveillance and immunizations as required for the Minor.
6. Ensuring that the Minor is appropriately supervised at all times.
7. Notifying the Department Chair/College Dean and EHLS if the nature/scope of the Minor’s activities changes.

**Sponsoring Department:**
The Department sponsoring the “Minor” shall be responsible for the following:
1. Providing administrative support to the Sponsor and Minor to ensure that intended experiences are realized.

**Minors and Parents:**
1. The Minor and Parent/Legal Guardian will complete the Release and Indemnification Agreement “Consent Form” in entirety and obtain necessary signatures (if needed) and agree to work under the mentorship of the Sponsor of the research project intended.
2. Adherence to rules and regulations as well as safety practices. Minors shall conduct themselves in a manner that will further their objectives.

**EHLS:**
EHLS shall be responsible for the following:
1. Reviewing the Application Forms and proposed research activities and advising the Sponsor before the Minor is notified of acceptance.
2. Recommending trainings and providing such in a timely manner to facilitate the objective of the program.
3. Reviewing any change in scope and providing advice to the Sponsor.
Note: EHLS may inspect the proposed laboratory where the Minor is applying to before commencement and at any time while such activity is in progress. All laboratories determined by EHLS as conducting higher-risk activities will be inspected prior to the commencement of the Minor’s activities. EHLS has the authority to suspend the Minor’s laboratory activities if deemed unsafe, safety deficiencies not corrected or other violations related to stipulations made by EHLS or other institutional compliance bodies. The IACUC, IBC, IRB and RSC or any other institutional compliance office or designee have the authority to oversee research in their areas of responsibility and to suspend activities when such action is deemed unsafe or inappropriate.

Please visit the EHLS website at www.uh.edu/ehls or call 713-743-5858 for more information.

A. Review and Responsibility

Responsible Party: Applicable UH Faculty, Research Laboratory Managers/Research Center Directors, Supervisors as well as researchers who are required to ensure these guidelines are followed.

University of Houston, Environmental Health and Life Safety Bureau of the Department of Public Safety

Review of this policy will be conducted every even numbered year and as needed.

B. Approval

Approval Director, EHLS

Date of Approval: June 1, 2011