

# Augusta University

## Policy Library

# Minors in Laboratories or Other Potentially Hazardous Areas

**Policy Manager: Environmental Health and Safety Division**

### **POLICY STATEMENT**

In accordance with the Board of Regents Human Resources Practice Manual, persons under 18 years of age (minors) are prohibited from entering laboratories or other areas where potentially hazardous materials or conditions are present except when entry is:

1. Part of an escorted, scheduled tour coordinated with Environmental Health and Safety Division (EHSD), or,
2. Part of an institutionally sponsored educational program coordinated with EHSD, or,
3. By a minor 16 -18 years of age with education and maturity sufficient to comprehend basic biological and chemical concepts attendant to personal risk and safety after completing a chemical safety and biosafety training and as determined jointly by the Faculty/Staff sponsor and the parent or guardian, and
4. Approved by the Associate Vice President (AVP), Environmental Health and Safety and the sponsor/lab manager in accordance with this policy.

Regularly enrolled students under 18 years of age are not subject to this policy. All Department of Labor regulations prohibiting working with radiation and explosives still apply to regularly enrolled students.

In all cases, minors in laboratories or other areas where potentially hazardous materials or conditions are present shall be under the continuous and direct (line of sight) supervision of a faculty or staff member familiar with the hazards and corresponding safety measures.

### **AFFECTED STAKEHOLDERS**

*Indicate all entities and persons within the Enterprise that are affected by this policy:*

- Alumni     Faculty     Graduate Students     Health Professional Students  
 Staff     Undergraduate Students     Vendors/Contractors     Visitors  
 Other: All Augusta University organizational elements

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**Executive Sponsor: AVP, Environmental Health and Safety Division**

**Next Review: 4/2025**

## **PROCESS & PROCEDURES**

### **General**

All AU laboratories are considered potentially hazardous areas; these hazards are presented by biological materials, toxins, pathogens, chemicals, or radioactive substances. Few studies exist which adequately characterize potential differential health consequences of exposure of minors to these hazards. For this reason, the Augusta University Radiation Safety Guide, Biological Safety Guide, and the Chemical Safety Guide all prohibit persons under the age of 18 from entering laboratory areas or other areas where hazardous materials or conditions may be present, except when any of the situations outlined in the policy statement apply.

### **Minors Involved in Research**

While Augusta University recognizes that volunteering or working within a laboratory can provide a valuable learning experience, minors are restricted from entering laboratories unless the following restrictions/guidelines are followed:

- Federal law explicitly prohibits any minor under the age of 18 years from working in areas where exposure to radiation may occur.
- Federal law explicitly prohibits minors under the age of 18 years from working where explosive materials may be stored or used.
- Due to the increased risk of illness or injury, the Augusta University Institutional Biosafety Committee has determined that minors are not permitted in any non-human primate areas, Animal Biosafety Level (ABSL) – 2 areas, or in Biological Safety Level (BSL) – 2+ laboratories.
- Minors are not permitted to transport or ship hazardous materials outside of the laboratory.
- Minors are not permitted in vivarium and are not permitted to work with lab animals because they cannot be enrolled in the IACUC's occupational health program.
- Parents or guardians must be fully informed of the risks faced by their minor child in these areas.
- Constant and direct supervision by faculty or a staff member familiar with the hazards and corresponding safety measures is required to ensure the minor's safety. Activities engaged in by the minor within the laboratory must be closely monitored. This requires physical proximity (line of sight) and attentiveness of the supervisor.
- An evaluation and risk assessment of the minor by a qualified medical professional is required. Health care provisions are required for the minor in case of incident, exposure, or illness which may result from participating in laboratory activities.

An approved minor can enter lab areas not covered by the above restrictions/guidelines, as long as they comply with the requirements outlined in the section Responsibilities of a Minor (below).

Sponsors of minors who will work in laboratories as part of individual education development plans shall submit an application to EHSD in accordance with the instructions below:

### **Responsibilities of the Faculty/Staff Sponsor**

1. The sponsor shall complete an *Application for Authorization of a Minor to Work or Volunteer in a Laboratory or Other Hazardous Area (Minor's Application)* and submit the application to EHSD for review and approval. This form will document knowledge of, and adherence to the requirements addressed above.
2. The sponsor shall discuss with the parent/guardian the hazards present within the laboratory that the minor may be exposed to during the course of their research.
3. Informed consent of the parent(s) or guardian(s) of the minor who will work or volunteer in the laboratory will document the risks associated with the hazards present in the laboratory and mitigating actions to reduce those risks. As part of the consent process the sponsor will:
  - a. Describe the safety procedures that are present to minimize their minor's exposure risks. These include a discussion and documentation of any precautionary and emergency medical provisions that must be provided for the minor.
  - b. Give the parents/guardians and minor sufficient time to read the *Consent Form*, the *Minor's Application* (final version) and related institutional or laboratory SOPs to ensure that the parents'/guardians' and minor's questions have been answered before they sign the *Consent Form*.
  - a. Re-consent the parent/guardian if there is a change in risk – including different materials, operations, or locations which would increase the risks to the minor.
4. The sponsor shall be familiar with the Minors on Campus Policy and adhere to the Minors on Campus Policy Code of Conduct.
5. The sponsor shall adhere to all Augusta University Safety/Compliance Committee (Institutional Biosafety Committee, Institutional Chemical Safety Committee, Institutional Animal Care and Use Committee) policies and procedures, including, if necessary, the submission and approval by the respective committees of research protocol amendments.
6. The sponsor shall address EHSD concerns and incorporate requested edits into the final version of the *Application* and *Consent Form* and re-submit to EHSD.
7. Minors will be provided with and wear appropriate personal protective equipment PPE (full length long sleeve lab coat, safety glasses and a pair of nitrile gloves) as required. The sponsor shall also remind minors of standards for lab appropriate clothing and footwear (e.g., closed toed shoes, long pants).

### **Responsibilities of EHSD**

EHSD shall:

1. Review applications for minors in laboratories and provide comments back to the sponsor.

2. Work with the sponsor to identify hazards and safety measures.
3. Provide a copy of the Health Questionnaires to Employee Health and Wellness for review and medical clearance by hand.
4. Coordinate with institutional safety committees.
5. Notify the sponsor of approval of the minor's application.
6. Provide safety training to the minor.

### **Responsibilities of the Minor**

1. The minor shall provide a completed and signed *Health Questionnaire* from a licensed health care provider to Environmental Health and Safety via mail or hand delivery. This questionnaire will illuminate any health concerns, including mental health issues, which present additional risks to the minor while working in a research laboratory with biohazardous or chemical agents. The questionnaire will be reviewed by Employee Health and Wellness Office and provide the basis for medical clearance.
2. The minor shall provide a signed Consent for Minor's Presence in Laboratory form (Consent form) from the parent or guardian and submit the form to EHSD after discussions of hazards found in the laboratory. The form should be sent to Environmental Health and Safety via email or hand delivery.
3. The minor shall complete one-on-one hazard-specific training with an EHSD representative, and, if conducting work in a laboratory, all safety training required of new laboratory staff prior to initiation of work.
4. The minor shall not enter the laboratory unless the designated supervisor or a representative listed in the *Minor's Application* is present.
5. Failure to comply with any provision detailed on the *Minor's Application*, Institutional Policies, or government regulations may result in termination of the authorization for the minor to enter the laboratory after joint review by the sponsor/lab manager and EHSD.

### **REFERENCES & SUPPORTING DOCUMENTS**

#### **Forms:**

Application for Authorization of a Minor to Volunteer in a Laboratory or Other Hazardous Area:  
<http://www.augusta.edu/services/ehs/biosafe/minorsinlab.php>

Parental Consent for Minor's Presence in Laboratories:  
<http://www.augusta.edu/services/ehs/biosafe/minorsinlab.php>

Minors Health Questionnaire  
[https://www.augusta.edu/services/ehs/biosafe/documents/minors\\_health\\_questionnaire\\_rev11.doc](https://www.augusta.edu/services/ehs/biosafe/documents/minors_health_questionnaire_rev11.doc)

#### **References:**

U.S. Department of Labor (US DOL) Occupational Safety and Health Administration (OSHA) Fair Labor Standards Act (FLSA) Title 29, Chapter V Code of Federal Regulations, Part 570 Child Labor Regulations, Order and Statements of Interpretation:

<https://www.ecfr.gov/cgi-bin/text-idx?SID=c4387a34fcaa0b36d657d3574da730e4&node=pt29.3.570&rgn=div5>

Youth and Labor: <http://www.dol.gov/dol/topic/youthlabor/agerequirements.htm>

Hazardous Jobs: <http://www.dol.gov/dol/topic/youthlabor/hazardousjobs.htm>

Georgia State Department of Labor Hazardous Occupations  
[http://www.dol.state.ga.us/em/cl\\_hazardous\\_occupations.htm](http://www.dol.state.ga.us/em/cl_hazardous_occupations.htm)

Center for Disease Control (CDC), National Institute of Occupation Safety and Health (NIOSH) NIOSH Safety and Health Topic: Young Worker Safety and Health:  
<http://www.cdc.gov/niosh/topics/youth/>

Recommendations to the U.S. Department of Labor for Changes to Hazardous Orders:  
<http://www.cdc.gov/niosh/docs/NIOSHRecsDOLHaz/default.html>

Augusta University Minors on Campus website  
<https://www.augusta.edu/compliance/minorsoncampus/>

[Minors on Campus Policy Code of Conduct](https://augustauniversity.app.box.com/s/o7iudhd78qd9u87e3vvvrsdycmhveiuc)

<https://augustauniversity.app.box.com/s/o7iudhd78qd9u87e3vvvrsdycmhveiuc>

## **RELATED POLICIES**

Augusta University Minors on Campus Policy

<https://www.augusta.edu/compliance/policyinfo/policy/minors-on-campus-policy.pdf>

University System of Georgia Board of Regents HR Manual Policy on Age Criteria

[https://www.usg.edu/hr/assets/hr/hrap\\_manual/HRAP\\_Age\\_Criteria\\_Employment.pdf](https://www.usg.edu/hr/assets/hr/hrap_manual/HRAP_Age_Criteria_Employment.pdf)

## **APPROVED BY:**

Executive Vice President for Academic Affairs and Provost, Augusta University

Date: 4/14/2022

President, Augusta University

Date: 4/15/2022