

Augusta University

Policy Library

Minors in Laboratories or Other Potentially Hazardous Areas

Policy Owner: Environmental Health and Safety Division

POLICY STATEMENT

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 student enrolled at Augusta University or,
4. Approved by the Associate Vice President (AVP), Environmental Health and Safety in accordance with this policy, and
5. By a minor 16 years of age or older with education and maturity sufficient to comprehend basic biological and chemical concepts attendant to personal risk and safety.

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 STAKEHOLDER AND ORGANIZATION(S)

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

REASON FOR POLICY

Occupational health and safety exposure assessments that form the basis for regulatory controls address the risks to healthy human adults and do not account for differential effects on physically immature individuals. Because of their biological, social, and maturational characteristics, minors have unique and substantial risks for workplace-related injuries and illnesses which must be assessed and addressed prior to permitting entry into laboratories or other areas where potentially hazardous materials or conditions are present. The presence of minors in these areas must also comply with Federal and State regulations and Institutional Policies and Procedures.

Office of Compliance and Enterprise Risk Management Use Only

Policy No.: 604

Policy Sponsor: Associate Vice President, Environmental Health and Safety

Originally Issued: Not Set

Last Revision: 05/13/2017

Last Review: 07/03/2017

DEFINITIONS Not used.

PROCESS & PROCEDURES

General

All AU laboratories are considered potentially hazardous areas; these hazards are presented by biological materials, 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.

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 concerns are addressed:

- 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.
- Parents or guardians must be fully informed of the risks faced by their minor child in these areas.
- Constant and direct supervision 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.

Sponsors of tours or educational programs that involve entry of minors into laboratories or other areas where potentially hazardous materials or conditions are present shall coordinate with EHSD during the planning process to establish safety guidelines.

Sponsors of minors who will work in laboratories as part of individual educational 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 obtain a completed and signed *Health Questionnaire* from a licensed health care provider and submit it as part of the *Minor's Application*. This questionnaire will illuminate any health concerns that 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.
3. The sponsor shall obtain a signed *Consent for Minor's Presence in Laboratory* form (*Consent Form*) from the parent or guardian and submit the form to EHSD for as part of the *Minor's Application*. 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. Discuss with the parent/guardian the hazards present within the laboratory that the minor may be exposed to.
 - b. 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.
 - c. 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*.
 - d. 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 adhere to all Augusta University Safety/Compliance Committee (Institutional Biosafety Committee, Institutional Review Board, 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.
5. 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.

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.

2. Forward Health Questionnaires to Employee Health and Wellness for review and medical clearance.
3. Coordinate with institutional safety committees.
4. Notify the sponsor of approval of the minor's application.
5. Provide safety training to the minor.

Responsibilities of the Minor

1. 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.
2. The minor shall not enter the laboratory without the designated supervisor present.
3. Failure to comply with any provision detailed on the *Minor's Application*, Institutional Policies, or government regulations will result in termination of the authorization for the minor to enter the laboratory.

FORMS AND RELATED 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>

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://webapps.dol.gov/FederalRegister/HtmlDisplay.aspx?AgencyId=14&DocId=23891>

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

Center for Disease Control (CDC), National Institute of Occupational 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>

RELATED POLICIES
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APPROVED BY:

President, Augusta University and CEO, AU Health System Date: Not Approved Yet