



Guide for UA Youth Programs



THE UNIVERSITY OF
ALABAMA[®]

Division of
Finance and Operations
Compliance, Ethics, and Regulatory Affairs

Contents

I.	Program Overview.....	4
II.	Planning Your Program.....	5
	1. Agenda.....	5
	2. Operating Procedures	5
	3. Housing.....	6
	Accommodations	6
	Overnight Supervision.....	6
	4. Transportation.....	6
	5. Emergency Plans.....	7
	6. Waivers.....	7
	7. Managing Medical Issues	7
	Medical Information Management	7
	Medication Management	8
	Seeking Medical Care.....	10
	8. Accommodating Special Needs	12
	Food Allergy Accommodations.....	12
	9. Information for External Entities.....	13
	Insurance.....	13
	Permissive Use Agreements	13
	Waivers	13
	Background Checks	13
	Disclaimer.....	14
	Third-Party Entities/LLCs Owned by University Employees	14
	10. Parent Communication	14
	11. Merchandise Sales.....	15
	12. Participant Registration.....	15
	Walk-up Registration	15
	13. Participant Registration Portal	15
	14. Marketing Materials.....	16
	Children’s Online Privacy	16
	15. Lab Safety Training	16
III.	Registration and Approval.....	16
IV.	Program Staff.....	17
	1. Training Requirements	18
	2. Background Checks for UA sponsored programs.....	18
	Background Checks for External Programs.....	19
	3. UAPD Review	20
	4. Counselor-to-Participant Ratios	20
	5. One-on-One Interactions	22
V.	Managing the Unexpected	22
	1. Injuries, Incidents or Accidents	22
	2. Abuse or Neglect of a Minor	22

Steps to Report Child Abuse	23
VI. Wrapping Things Up	24
VII. Accountability.....	24
VIII. Reporting and Investigations.....	25

Compliance, Ethics, and Regulatory Affairs

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205-348-2334

youthprotection@ua.edu

I. Program Overview

The University of Alabama (“the University” or “UA”) is committed to providing a safe and welcoming experience for minors. Faculty, staff, students, student employees, graduate assistants, contractors, or volunteers are therefore expected to hold themselves to the highest standards of conduct when interacting with minors, as outlined by the [Youth Protection Policy for UA Sponsored Programs](#). This Guide is designed to assist with the development of guidelines and practices to support compliance with University policy regarding activities or programs for or that include minors, including camps, conferences, and outreach activities. Terms defined in the Youth Protection Policy for UA Sponsored Programs carry the same definitions when used herein. All areas/programs are still subject to all other relevant UA policies and procedures, including the UA [Child Abuse Reporting Policy and Procedures](#) and the [Facilities and Grounds Use Policy](#). Except for the exclusions listed in this policy, all Youth Programs are within the scope of this policy. This includes, but is not limited to:

- Activities or programs that include minors on campus or in University facilities, including, but not limited to, overnight programs, instructional programs, day camps, academic activities, and sports camps.
- Activities or programs that the University operates that include minors but that do not take place on campus, including, but not limited to, outreach and community service activities.
- Faculty or staff who bring minors to campus as interns or volunteers outside of a structured activity or program that include minors (e.g., to intern in a laboratory, job shadowing, etc.). This could also include auditions, lessons, tutoring, or tours where the parent or guardian is not present.
- Student organizations or any other University-affiliated organization operating, facilitating, or sponsoring activities or programs that include minors.
- All programs offered virtually, regardless of the presence or absence of parents, guardians, teachers, or coaches.

This policy does not apply to:

- Undergraduate and graduate academic programs involving a minor participant who is enrolled or who has been accepted for enrollment as a student at the University.
- Properly registered recruiting events sponsored by a University recognized student organization that may be attended by minors who are enrolled or have been accepted for enrollment as a student at the University.
- Events on campus open to the general public that minors may also attend (e.g., sporting events, theatre performances, etc.).
- Events or programs offered by University personnel in which the minor is accompanied by a parent, guardian, teacher, or coach at all times. (This exception does not apply to virtual programs.)
- Research programs involving minors which are approved by the University’s Institutional Review Board (IRB).

- Medical care given to minors in an in-patient or out-patient setting in the University Medical Center or other University patient-care setting.
- Normal operations of licensed childcare facilities or programs. These facilities or programs are expected to comply with all applicable laws and regulations and are outside the scope of this policy. However, separate camps, programs, or activities sponsored by these facilities could be subject to this policy.

All questions, documents, or communications should be directed to:

Compliance, Ethics, and Regulatory Affairs

Box 870107, 2810 Capital Hall

205-348-2334

youthprotection@ua.edu

II. Planning Your Program

There are several components to planning youth programs and activities that must be considered early in the process to ensure a successful event. This section outlines the major topics that should be explored prior to registering the program or registering participants.

1. Agenda

The first step in developing the program is to map out the agenda, detailing the activities, locations, and timeframes. Youth participants must be properly supervised at all times from drop-off to pick-up. Ensure that all meals, free time, and transitional times are accounted for, and supervision is provided.

2. Operating Procedures

It is important to document expectations of how administrative duties will be handled throughout the event and ensure that all program staff have a clear understanding of their responsibilities. Topics to be addressed include:

- **Identification of Program Staff.** How will parents and program participants be able to identify program staff? Will they wear specific clothing or nametags?
- **Procedures for drop-off and pick-up.** How will you ensure that participants are only released to an authorized individual (parent, guardian, or documented designee)? Who will be responsible for managing this process?
- **Emergency Communication.** How will you communicate with parents if an emergency occurs? This could include accidents affecting only one or two children or weather issues that require cancellation of activities. Also consider providing an emergency contact name and phone number for parents who may need to contact their child during the event.

- **Behavior Management.** Sometimes children need a little extra encouragement to follow the rules. Who would handle children with behavior issues that need to be dealt with away from the rest of the group? If parents must be called to pick up the child, who would supervise them while they wait?
- **Physical Contact and Communication with Participants.** Operating procedures should also include guidelines that detail the appropriate physical contact and communication by Program staff with minors based on the age of the minor and the nature of the program activities. Any behavior or contact between Program Staff and Program Participants that violates approved program activities, established law, UA's [Child Abuse Reporting Policy and Procedures](#), or other relevant UA policies is prohibited.

3. Housing

Accommodations

For programs that require participants stay overnight, arrangements may be made with [Housing and Residential Communities](#) to provide accommodations. Available dates run from late May through the end of July, and space is allotted on a first-come, first-served basis.

An initial up-to-date list of all attendees with room assignments, if applicable must be provided to Housing and Residential Communities no later than 2 weeks (10 business days) prior to arrival date and no later than three business dates for any additional updates.

Questions regarding housing accommodations may be directed to:

Housing and Residential Communities

Phone: (205) 348-6676

housing@ua.edu

Overnight Supervision

Overnight programs present a unique set of challenges that must be managed carefully. Please be aware of the following safety precautions:

- Additional supervision is required for overnight programs. See the Counselor-to-Participant Ratio section of this Guide for acceptable counselor to participant ratios based on the participant age group.
- Program staff should not enter participant rooms alone. If it is necessary to enter a room to check on a participant, two staff members should be present at all times. In emergency situations, when another staff member is not available, the door(s) must remain open at all times. See the section on [One-on-One Interaction](#).
- Housing and Residential Communities staff are responsible for building operations. They are NOT intended to serve as supervision for youth participants.

4. Transportation

Transportation plans, including information regarding the transportation of minors at the beginning and end of the program, to and from the program, and within the program, whether

by parents, guardians, Program Staff or others should be documented. For overnight programs, transportation plans must include parking, drop-off, and/or pick-up information for moving in and out of residence halls. Programs that use University vehicles or drivers must also comply with [University policies regarding drivers and vehicles](#).

5. Emergency Plans

Emergency plans, including guidelines for weather emergencies and for communicating and responding to UA Alerts must be documented and provided to all program staff. Emergency plans should be specific to the needs of youth participants. The [Youth Protection Program Emergency Plan Template](#) has been developed as a document to be shared internally with staff prior to the start of the program. This template is a starting point that may be customized to cover a wide range of situations.

Each program or activity must also develop a plan for communicating pertinent emergency procedures to the Parent/Guardian of each program participant. The plan must include procedures for the notification of the minor's parent/legal guardian in case of an emergency, including medical or behavioral problems, natural disasters, or other significant program disruptions. Participants and their parents/guardians must be advised of these procedures in writing prior to program participation. Programs should request parent contact information and keep this information accessible for use in the event of an emergency.

6. Waivers

Each program participant and program staff member must complete and submit a [Youth Protection Program: Liability Waiver](#) form. Programs managed by external entities should use the [Youth Protection Program: Liability Waiver for Third Party Programs](#) form.

7. Managing Medical Issues

This section outlines the requirements for collecting and maintaining medical information and the requirements for medication management in all activities or programs included in the UA Youth Protection Program. For the purposes of this program, medical information can include all information related to health and wellness, and medication includes both prescription and over-the-counter items. Information regarding medical information requirements, security, and medication management procedures should be communicated to the parent or guardian of the youth participant in advance of the program.

Medical Information Management

Depending on the nature and usage of the information collected, medical information can be covered by a variety of regulations, standards, or best practices. Regardless of the specific standard, medical information is private, individually identifiable information, and should be treated as such. Access to these records should be restricted to the minimum number of

people necessary. The records should be stored under lock when not in active use and submitted to CERA for record keeping at the end of the program.

Programs of less than four (4) hours duration generally require minimal medical information, but this can vary depending on the program activities. If needed, a program can utilize the [Youth Protection – Medical Information Form](#) to collect information. Programs of less than four (4) hours do not handle medication. Programs of more than four (4) hours should collect medical information from participants. Overnight programs are required to have medical information and Medication Management programs as outlined in this Guide.

At a minimum, regardless of the length of time of the activities, each program shall have a plan for responding to accidents and emergency events, including communication to participants and their parents/guardians. These plans should be submitted to CERA with the program registration for review and approval in advance of participant registration. Once approved, each program director shall train their staff on these plans and ensure that they understand both their response and their reporting obligations. Programs should collect insurance information (front and back of medical insurance cards) so that the program can secure medical assistance for a participant should the need arise. These copies should be treated as medical documentation, kept in a secure location with the participant's other medical information, and submitted to CERA for maintenance and disposal at the end of the program.

Programs of more than four (4) hours or that involve physical activities may need to collect more detailed information. In this case, the UA Youth Protection – Medical Information form is provided and should be used. In some cases, a program will need to document the review of more specific information than is collected by the Youth Protection – Medical Information form. If the Youth Protection – Medical Information form will not be used, the program should submit their proposed documentation to CERA at registration to allow for review. This review will need to occur prior to participant's registering for the activity.

In addition, some programs, specifically athletics programs, may have other documentation related to possible accidents or injuries. These documents should be included with the registration submission to allow for a comprehensive review by CERA. As an example, the Alabama High School Athletics Association uses both the [Pre-participation Physical Evaluation Form](#) to document an athlete's fitness to participate in interscholastic athletics and the [Concussion Information Form](#) to document their concussion protocols.

Medication Management

In addition to the collection of medical information, programs of more than four (4) hours are expected to have procedures in place to meet the needs of youth participants who need to take medication or provide an equivalent set of procedures for review/approval by CERA prior to the beginning of the program. Any program of less than four (4) hours can choose not to allow medications as long as this is communicated clearly to the parents. No program, regardless of length, can refuse to allow necessary medications, such as insulin, asthma inhalers, epi-pens, or other related items.

For programs of more than four (4) hours, at least two program staff members should be designated as the contacts for medication management. Both parents and participants must be advised in pre-camp communications who these staff members are, and that program staff will be taking up all medications during the duration of the program or activity (see Procedures). The only exceptions will be for inhalers, epi-pens, and other such rescue medication that should remain with the participant at all times. Contact CERA if assistance is needed with coordinating training for handling these medications. [Youth Protection Medication Management Forms](#) authorizing use of both prescription and over-the-counter medication should be submitted by the participant's parent/guardian in advance of the program.

Procedures

Parents should place all over-the-counter and prescription medications for each youth participant in one plastic bag with their first and last name and date of birth written on the outside of the bag. As part of the drop-off check-in, all youth participants will be asked if they have any prescription or over-the-counter medications. If so, the medications should be submitted to the designated staff member(s). If youth participants do not have their medications in a bag, a bag will be made available. When the participant comes to the medication turn-in table, the staff will review the medication information previously submitted on the program registration and ensure it matches the turned in medications. If something in the previously submitted information has changed (new medications, altered dosage, etc.), a new form must be submitted at check-in. The designated staff member will ensure the participant's medication bag has their name and date of birth on the outside and will add the room number and camp name on the outside. The bag should be maintained in a lock box for the duration of the program. The designated staff member should transport the lock box with them as needed and store it when not in use. Rooms used for storage, including dorm rooms, must be locked at all time when the staff member leaves the room to maintain the security of the medications.

Staff will hold the participant's medication bags and provide the medications to the participant as they need them. Because staff members for programs and activities subject to the Youth Protection Program are not licensed to prescribe or administer medications, they will only hold these medication bags and provide the bags to the youth participants when they need to take a medication. At no time will a staff member handle a bottle or the contents of the individual's medication directly; nor will any staff member provide guidance on how the medication should be taken. If the participant is unsure of the medication to take or correct dosage, someone on the program staff will contact their parent or guardian for clarification.

Program staff should review their participant's medication information to be familiar with when medications are needed. **It is the participant's responsibility to contact staff for their medications, but staff should still be aware of when youth participants need the medications to remind them as needed.**

When a participant needs to take a medication, the designated staff member will give that participant's medication bag to the participant. **Ensure that the information given by the participant and the information on the medication bag match by asking the participant to provide their full name and date of birth; double check to make sure you do not give a participant another participant's medication bag. At no time will the staff handle the medication directly. The staff will never give any guidance on what medication to take or dosages.** If the participant is unsure of what medication to take, the staff will notify the Program Coordinator and someone will call the parent or guardian, if needed, to clarify medication requirements for the participant.

Any time a participant is given access to their medication (only given by a designated staff member), ensure this is recorded on a [Medication Administration Record \(MAR\)](#). Prescription items should be taken according to physician instructions. Over-the-counter (OTC) medications should be taken according to the manufacturer's directions. While it is not usually necessary to follow up on prescription items, OTC may require some follow up. Depending on the need that precipitated the OTC medication, that leadership team member may check on the participant after one hour to see if the medication has alleviated the symptoms; if this is done, follow up information is recorded on the MAR. If the participant's condition has not improved or has worsened, notify the Program Coordinator to determine the next actions to be taken and contact the participant's parents. All designated staff members will keep their MAR forms for the duration of the program and then turn in to the Program Coordinator at the end of the program. The Program Coordinator will turn in all MAR's to CERA.

All medications and medication bags will be returned to the participant's parent/guardian when the program is over.

Seeking Medical Care

If it appears that a participant requires medical care, the parent/guardian should be contacted immediately. Program staff should accompany any participant who seeks medical attention who is without their parent or guardian.

University Medical Center

Medical care will be provided to participants on weekdays from 8:30 a.m. to 4:45 p.m. at:

University Medical Center (UMC)
Sports Medicine Clinic
850 Peter Bryce Boulevard
205-348-4804 (Sports Medicine)
205-348-1770 (UMC Main)

The participant should report to the Sports Medicine receptionist or the Admissions Desk clerks. The parent/guardian will be responsible for any fees for service.

The walk-in Urgent Care Clinic is also available after-hours at UMC from 5:30 p.m. until 7:30 p.m. on Monday, Tuesday, and Thursday.

University Medical Center (UMC) Walk-In Urgent Care

850 Peter Bryce Boulevard
205-348-1770 (UMC Main)

Additional UMC Contacts:

Katie Oliver, 205-535-7372
Resident on-call, 205-348-1770

After-Hours Urgent Care

If non-emergency medical care is needed and University Medical Center is not open, participants should be transported to the nearest urgent care via a UA-issued vehicle. Use of personal vehicles to transport participants should be avoided, when possible. If it is an emergency, please call 348-5454 (on-campus) or 911 (off-campus) for an ambulance.

There are several urgent care clinics near campus that may be used for treatment of illnesses or injuries that do not warrant an emergency room visit. The options below are provided as a reference. *The University has no relationship to these clinics and cannot endorse the quality of care.*

- **American Family Care**, 509-2941, 710 15th Street East, Tuscaloosa, Monday-Saturday: 8 a.m. – 8 p.m.
- **Emergi-Care***, 349-CARE, 1601 University Blvd E, Tuscaloosa
Monday-Friday: 8:30 a.m. – 6 p.m., Saturday: 8:00 a.m. – 12:00 p.m.,
Sunday: 12:00 p.m. – 5:00 p.m.
- **MedCenter South***, 343-2225, 5005 Oscar Baxter Drive, Tuscaloosa
Monday-Saturday 8:30 a.m. – 8 p.m., Sunday 1 p.m. – 8 p.m.
- **MedCenter North***, 333-1993, 3909 McFarland Boulevard, Northport
Monday-Saturday 9 a.m. – 7 p.m., Sunday 1 p.m. – 7 p.m.

Emergency Room

Use of the DCH Emergency Room should be restricted to serious accidents or for illness that needs immediate attention, not for care that could be provided at UMC or at an urgent care clinic. To call an ambulance from the UA campus, dial 348-5454. To call from other locations, dial 911

8. Accommodating Special Needs

The Americans with Disabilities Act (ADA) requires that youth programs provide reasonable modifications of their policies, practices, and procedures when necessary to enable participants with disabilities to participate fully, unless the program can demonstrate that the necessary modifications would fundamentally alter the nature of the services and activities offered by the program. Reasonable accommodations could include, but are not limited to, ground floor housing assignments for individuals with mobility impairments, sign language interpreters for the deaf, special meals for individuals with food allergies, or more frequent breaks for individuals with physical disabilities. The necessary arrangements must be determined on a case-by-case basis through collaborative communication with the participant's parent/guardian, medical professionals, and other campus partners. Participants could be responsible for fees associated with these accommodations, depending on the agreed upon arrangements.

In order to facilitate and document the interactive process required by ADA, the Program Director will serve as the central contact for making arrangements for all accommodations for participants in UA operated programs. The Office of Compliance, Ethics, and Regulatory Affairs will coordinate accommodations related to facilities or services provided by UA for programs operated by external entities. Accommodations related to activities managed by external entities will remain the responsibility of the external entity, but CERA may be consulted for assistance.

[Youth Protection – Medical Information Forms](#) should be collected in advance of the program. Upon receipt of the forms, the Program Director will initiate contact with the parent/guardian of the participant and coordinate with appropriate campus service providers to develop a plan.

Food Allergy Accommodations

Food allergies and other special dietary needs are a growing condition in the youth population. Even those well versed in organizing camps may have seen an increase in food allergies in recent years. All programs should be prepared to accommodate participants with food allergies and other special dietary needs.

A food allergy is the body's negative reaction to a protein in a food. Allergic reactions can have a myriad of symptoms. A severe allergic reaction called anaphylaxis can lead to death; the person can stop breathing and/or could have a heart attack. Allergic reactions can occur quickly and from very small amounts of the allergen. Cross contact where an allergen has been transferred to another food or surface but isn't visible can cause an allergic reaction. The only way to avoid an allergic reaction is to not eat the allergen.

Camps serving food should have a method for soliciting and collecting information on food allergies such as the [Youth Protection – Medical Information Form](#). It is important to clearly communicate with any food vendors regarding food allergies and other special dietary needs.

[Bama Dining](#) is well versed in food allergy management, and camps utilizing Bama Dining should use the [Bama Dining Special Diet Accommodation Request Form for Campers](#).

When there are participants with allergies, program staff should be familiar with recognizing signs and symptoms of an allergic reaction and ready to implement emergency protocol.

For questions regarding food allergy accommodations, please contact:

Holly Grof
Dining Services Coordinator
Enterprise Operations
Phone: (205) 348-2981
hgrof@fa.ua.edu

9. Information for External Entities

There are special considerations for programs owned or operated by external entities (third parties) but hosted in UA facilities. These entities are subject to University policies including the [Youth Protection Policy for External Entities/Third-party Programs](#), the [Child Abuse Reporting Policy and Procedures](#) and the [Facilities and Grounds Use Policy](#). A UA faculty or staff member must be designated as the coordinator for any third-party youth activities or programs. Examples of external entities might include 4-H, coach-owned LLCs, American Legion, etc.

Insurance

Third-party entities must provide an insurance certificate which details the coverage for the program. Consult the [Insurance for Third Party Programs](#) webpage for more in-depth information.

Permissive Use Agreements

A Permissive Use Agreement (PUA) must be completed for all youth programs operated by external entities. The PUA must be added to any contracts with external entities for services or programs which involve youth participants. The finalized contract and the completed Permissive Use Agreement should be submitted with the program registration form.

Waivers

Each program participant and program staff member must complete and submit a [Youth Protection Program: Liability Release for Third Party Programs](#). This is a different version from the one required for UA-sponsored programs.

Background Checks

The process for obtaining background checks for employees and volunteers associated with youth programs operated by external entities differs from the process for UA programs. See the section titled [Background Checks for External Programs](#) for more information.

Disclaimer

The following statement should be included in all program related brochures, websites, advertising materials, etc.

“(Camp Name) is solely operated by (Legal Name of Entity), which is not affiliated with The Board of Trustees of The University of Alabama or The University of Alabama.”

Third-Party Entities/LLCs Owned by University Employees

University employees who have ownership of third-party entities/LLCs which operate youth programs on the UA campus, should take steps to ensure that they are keeping their external business interests separate from their work at the University. Work associated with the third-party entity/LLC should be conducted outside of the University-paid workday. University employees who work as staff at events sponsored by external entities should take leave for the duration of the program.

Per the [UA Code of Ethical Conduct](#), University property, equipment, finances, materials, electronic and other systems, and other resources *may only be used for University purposes or accepted incidental purposes as explained in other relevant UA policies*. In other words, UA resources must be used for UA business purposes and not for personal or third-party/LLC gain.

Additionally, the [Terms of Use of Electronic Accounts](#) states that all electronic media systems including voice mail, e-mail, the Internet, fax machines, hardware, software, local area networks, files, and all information composed, transmitted, accessed, received or stored in these systems are the property of The University of Alabama. These systems are to be used for conducting University business only and the use of this equipment for personal commercial purposes or for personal financial or other gain is strictly prohibited. These systems are not to be used for soliciting outside business ventures or soliciting for non-University related purposes.

10. Parent Communication

Communication and parent information packages must address the following:

- Detailed agenda
- Procedures for managing any medications that may be needed by the participant during the program or activity
- Personnel identification to be worn by Program Staff
- Drop-off and pick-up procedures
- Curfews (if overnight)
- Code of conduct for participants
- Prohibitions on the use of alcohol, tobacco, and non-prescribed drugs
- Appropriate supervision, which, among other things, includes proper supervisor-to-participant ratios
- Program contact information for parent use

- If internet access is provided to the participants, parents should be notified that there are no restrictions placed on the content.
- For virtual programs or activities, the parent or guardian of Participant agree to supervise the Participant at all times during the virtual components of the Program.

A [parent handbook template](#) has been developed to assist programs in developing a single communication piece that may be distributed to parents. The template must be customized to reflect the details for the program.

11. Merchandise Sales

The University Supply Store, as mandated by The University of Alabama Board of Trustees, has the exclusive franchise rights to conduct all mercantile activity on campus. Questions related to merchandise sales may be directed to:

Bernadette Chavira-Trull
Director, University Supply Store
205-348-2384
bchavira-trull@fa.ua.edu

12. Participant Registration

Walk-up Registration

Day of, or walk-up participant registrations or day of staff additions are prohibited. All participant registration processes must close at least 14 calendar days before the program start date to ensure all documentation is collected and all UA policies and procedures are followed.

13. Participant Registration Portal

The University has partnered with Ryzer to host the participant registration process for all UA-sponsored programs. Each program will have their own customized participant registration website that will be configured to meet the University's basic documentation requirements. CERA will initiate the setup request with Ryzer after the program's registration form is received. Participant registration may not be opened until the program has been properly reviewed and the program's website has been approved.

In addition to the registration fees for the program, the Ryzer system will assess a system fee of 5% of the registration cost (minimum of \$4) plus a UA administration fee of \$10 per participant. This administration fee is to cover the cost of background screenings for UA-sponsored program staff.

14. Marketing Materials

The [Branding and Licensing Approval Form](#) is mandatory for all marketing and advertising materials associated with UA-sponsored programs. This includes but is not limited to print advertising, flyers, brochures and other collateral materials, giveaway items, invitations, digital ads and graphics, radio and television ads, outdoor advertisements such as billboards, magazines, and other promotional materials. All materials must be submitted for review prior to purchase or placement. For questions, please email Jennifer Rodrigues, Director of Brand Strategy at jennifer.rodrigues@ua.edu.

Children's Online Privacy

The Children's Online Privacy Protection Act (COPPA) was originally enacted in 1998 as a way of protecting kids online. Updated in 2013, COPPA makes it illegal for commercial websites to collect identifying information about kids under the age of 13 without verifiable parental consent. The University of Alabama complies with the requirements of COPPA. Certain University sponsored events including summer youth programs, camps, tours and similar activities may include participants under the age of 13. University events or other activities which specifically exclude the participation of children under the age of 13 or, those where the participants' information collection is not done online, are not required to comply with COPPA. In all cases, however, the events managers and website operators should be familiar with the law's requirements.

Please visit the [COPPA Compliance](#) webpage for more details or email cera@ua.edu with questions or concerns.

15. Lab Safety Training

Minors performing activities in laboratories and/or around research animals may have additional documentation, training requirements or restrictions imposed, depending on the specific nature of the hazards in the area. It is the responsibility of the laboratory supervisor to coordinate all necessary training.

III. Registration and Approval

University departments sponsoring activities or programs for or including minors must maintain an up-to-date listing of those programs. Such lists should include each program's dates, times, locations, attendance (including age range and number of participants), and the contact information for the Program Director. All activities or programs for or involving minors, both in-person and/or virtual, must be [registered](#) and final approval received before program activities begin. Virtual programs and activities involving minors are required to submit a program registration, regardless of parent, guardian, teacher oversight. Registration for ongoing and pre-established activities or programs for or involving minors must be completed annually prior to the beginning of the University academic year. Registration for other activities or programs for

or involving minors should be completed no less than eight weeks in advance when possible but must be completed and approved **before** an activity or program for or involving minors begins.

Required documentation to initiate the registration and approval process includes:

- A complete description of the activities and a planned itinerary must accompany the registration. Include any additional information, documentation or waivers required for program activities.
- For third-party programs, in addition to the items listed in the first bullet, an insurance certificate and a [Background Check Certification Statement](#) will be required.
- A copy of all previously mentioned guidelines and communication plans (see section II).

Once the registration form has been received, the program director will be prompted to provide a completed [Staff Information Form](#). Training completions and background checks will be verified to ensure compliance.

All documents will be reviewed by appropriate UA departments as needed. Reviews will be accomplished via an electronic routing process to maximize efficiency. Final approvals will be provided to the UA Program Sponsor via email.

IV. Program Staff

All program staff must complete training and background checks in order to be cleared to work with youth participants. Program staff may include faculty, staff, students, or volunteers regardless of whether they are paid for the services that they provide to the program.

Once the registration form is submitted, the program director will be prompted to submit a completed [Staff Information Form](#). The following pieces of information are required for the staff vetting process: full legal name, email address, international status, phone number, date of birth, and University affiliation.

The staff list will be evaluated to determine the status of each staff member. If the program staff member has not completed training and a background check in the 12 months preceding the start date of the program, they will receive an email from youthprotection@ua.edu that contains links for them to access their training and authorize their background check.

Program staff who fail to complete the training and background check prior to the start of the program, and those who are declined based on their background checks, will not be approved to work.

Program Staff information must be submitted no less than three weeks prior to the start date of the program. All background checks and training should be completed at least one week before the start date of the program.

1. Training Requirements

All program staff must complete training on the following topics:

- The University of Alabama Child Abuse Reporting Policy and Procedures
- Medical & Emergency Information for the UA Campus
- Jeanne Clery Campus Security Policy & Crime Statistics Disclosure Act

Training for youth program staff is delivered via UA LMS. Upon completion, program staff will receive a copy of the training documents for future reference.

While all program staff must complete the required Youth Protection Program training, the Program Director is responsible for ensuring all staff are properly trained on any program specific risks. This could include, but is not limited to, safety measures, concussion protocols, pool/water safety, lab safety, fire safety, missing child procedures, and any other essential program procedures.

2. Background Checks for UA sponsored programs

All program staff must pass a federal, state, sex offender, and social media background check. The Youth Protection Program uses the same vendor for background checks as Human Resources, but the level of information requested is not the same.

College and unit activities or programs for and involving minors can require background checks on broader categories of individuals than those who are likely to have responsibility for the care, custody, or control of a minor as part of an activity or program, provided there is a business justification, that checks are made consistently across specific positions and that the process and the results of individual background checks have been approved. Units must perform background checks on broader categories of individuals if required by law.

- A background check must be completed every year to remain eligible to work in activities or programs for and including minors.
- College and unit activities or programs for and including minors must perform background checks on applicable individuals more frequently if required by law.
- Program Staff age 19 or under must successfully complete a Personal Reference Check in place of a criminal background check. Parental consent must be given before UA can perform checks on individuals under the age of 19.
- Records must be kept consistent with the unit's record keeping and the university records retention schedule.

Criminal convictions, deferred adjudications and/or sex offender background checks that return any offense could *potentially* disqualify a person from being employed by or assigned to a program or activity involving minors. Social media findings will also be considered in the review of potential staff members. Any areas of concern will be forwarded to the appropriate

University officials for review. In the event that the University officials restrict a person from working with minors, this restriction will be communicated to the UA Program Contact.

Convictions in the following categories or categories that are similar in nature to the following may disqualify a potential staff member from working in a youth program:

- Felony
 - Murder
 - Child abuse or neglect
 - Crimes against children, including child pornography
 - Spousal abuse
 - Crimes involving rape or sexual assault
 - Kidnapping
 - Arson
 - Physical assault or battery
 - Drug-related offenses committed during the preceding 5 years.
- Misdemeanor (Committed as an adult against a child)
 - Child abuse
 - Child endangerment
 - Sexual assault
 - Child pornography

Conviction of criminal offenses relating to the abuse, exploitation, or neglect of an elder, an individual with disabilities, or animals will also be considered.

Background Checks for External Programs

All youth programs owned or operated by external entities that are required to be registered in accordance with the [Youth Protection Policy for External Entities/Third-party Programs](#) must provide a completed [Background Certification Statement](#) certifying that all of the User's Event/Program staff (including all employees and volunteers) have been subject to and passed appropriate background checks as outlined herein, including social media checks, within the last twelve months. Only Event/Program staff certified as passing background checks, including social media checks, within the last twelve months will be allowed to participate in the program. Programs shall not knowingly permit any staff to participate in program activities if the employee or volunteer does not pass the background check. Programs that fail to comply with the Youth Protection Policy and these background check requirements may be subject to suspension or termination of operations.

External programs may choose from the following options for conducting background checks:

1. The external entity may conduct background checks through a vendor of their choice, at their own expense, as long as they provide written certification that all staff have been checked AND as long as the checks conducted meet University standards.

2. The external entity may choose to partner with the University's background check provider, Risk Mitigation. The University will pay for background checks conducted through the Risk Mitigation Portal, but the external entity will be responsible for managing the process and evaluating the results.

Each criminal background check must include the following minimum requirements and parameters:

1. Criminal Search
 - a. 10-year felony and misdemeanor search based on all jurisdictions provided on application and social security number trace.
 - b. Hands on county criminal search or direct access to county court terminals that are updated daily are utilized.
 - c. Statewide searches conducted in the following areas: Alaska, Alabama, Arizona, Colorado, Connecticut, District of Columbia, Florida, Hawaii, Iowa, Idaho, Kansas, Kentucky, Maryland, Michigan, Missouri, New Mexico, New York (when applicable), North Carolina, North Dakota, Oklahoma, Rhode Island, South Carolina, and Wisconsin
 - d. Federal criminal search conducted on a nationwide basis in all United State District Courts.
 - e. All maiden names and AKAs are included in the search.
2. Social security number traced through multiple sources to include the three credit bureaus.
3. National DB Offender Scan: The scope is a multi-jurisdictional search consisting of court records, incarceration records, prison/inmate records, probation/parole/release information, arrest data, wants and warrants, 50 state Sex Offender Registry search, and the USA Patriot Act Search (U.S. and foreign sanctions and watch lists as provided by states, U.S. and foreign government, and international organizations). Any hits are verified at the court of original jurisdiction.
4. Social media search conducted through approved vendor, Social Intelligence.

3. UAPD Review

The University of Alabama Police Department conducts a safety review of youth program staff to ensure that there are no trespass orders that would exclude the individuals from working with children in UA programs or on the UA campus.

4. Counselor-to-Participant Ratios

Counselor to participant ratios should conform to the ratios listed below. Programs or activities involving minors with a small (less than 5) number of participants should have a minimum of two individuals responsible for oversight. In large groups of participants, programs may need to provide additional staff for the oversight of youth participants, depending on the intended activities. Regardless of the number of participants, at least 80% of the counselors must be age 18 or older.

At no time should a participant or group of participants be left alone or without the appropriate number of program staff. The following supervision ratios should be maintained at all times while the participants are in the care, control, or custody of program staff. This includes but is not limited to:

- Periods when participants are given “free” or “rest” time.
- Overnight when participants are housed in UA residence halls or hotels without being accompanied by their parents. There should be sufficient staff on each floor to maintain the appropriate ratio for the age of the participants.
- Travel to and from meals and activities.

Youth Participants	Ratio of Program Staff: <i>Overnight</i> Youth Participants	Ratio of Program Staff: <i>Day-only</i> Youth Participants
5 years and younger	1 staff for every 5 participants plus one additional staff. *	1 staff for every 6 participants plus one additional staff. *
6–8 years	1 staff for every 6 participants plus one additional staff. *	1 staff for every 8 participants plus one additional staff. *
9–14 years	1 staff for every 8 participants plus one additional staff. *	1 staff for every 10 participants plus one additional staff. *
15-18 years	1 staff for every 10 participants plus one additional staff. *	1 staff for every 12 participants plus one additional staff. *

*see paragraph below for additional explanatory information

All program staff ratios should conform to the above guidelines from the American Camps Association, plus 1 additional staff member, meaning that programs should maintain one additional staff number over the number required by the above listed ratios. If the calculation results in a fractional number, always round up to the nearest whole number.

If participants from multiple age groups are combined in a single group, the ratio for the youngest participant in the group should be applied.

Examples:

- a.) A day camp of 10-year olds with 5 participants would require 2 staff members at all times.
- b.) A day camp of 10-year olds with 50 participants would require 6 staff members (1:10 ratio means 5:50 so 5 staffers plus one additional for a total of 6 staff members).
- c.) An overnight camp of 15-year olds with 1000 participants would require 101 staff members (1:10 ratio means 100:1000 so 100 staffers plus one additional for a total of 101 staff members).

For assistance with determining the appropriate numbers of Program Staff or questions regarding staffing requirements, contact Compliance, Ethics, and Regulatory Affairs.

5. One-on-One Interactions

One-on-one interactions may take place only in open, well-illuminated spaces or rooms where they are observable and interruptible by other adults from the activity or program. For virtual programs or activities, the parent or guardian of Participant agree to supervise the Participant at all times during the virtual components of the Program.

V. Managing the Unexpected

Even with the best planning, unexpected issues may arise.

1. Injuries, Incidents or Accidents

Incidents and accidents can include such things as: minor to major physical injuries of participants and/or counselors; behavioral issues among participants, counselors, or visitors; hospital/doctor visits; violent or potentially violent behavior; the possession or use of alcohol or other drugs; inappropriate physical contact; or violations or potential violations of UA policy.

Emergencies, including emergency medical situations, should be reported to UAPD at 205-348-5454.

Any incidents, accidents, injuries, or behavioral concerns occurring during a program or activity for or including minors must be reported to UA according to established policies. Please refer to the [Youth Program Incident Reporting](#) webpage for a directory of reporting avenues for various types of situations.

In addition to any other reporting or incident documentation, the UA Program Contact or Program Director must report any accidents/incidents to Compliance, Ethics, and Regulatory Affairs as soon as possible. If consultation regarding reporting is needed, or if there are questions on the process or other support needed, please contact Youth Protection at youthprotection@ua.edu.

2. Abuse or Neglect of a Minor

In accordance with the UA [Child Abuse Reporting Policy and Procedures](#), if you become aware or even suspect that a child is a victim of child abuse or neglect, **you must act**.

Tips for recognizing abuse:

- **Listen closely.** Youth participants often form a bond with program staff and may disclose past or current abusive situations.

- **Believe them.** It is not your responsibility to investigate or substantiate claims. Remember that even highly regarded members of the community sometimes turn out to be abusers.
- **Watch participants carefully.** Up to 40% of children who are sexually abused are abused by older, more powerful children. As youth programs place more emphasis on controlling adult/child interactions, they sometimes leave openings for peer abuse. Identify blind spots where peers might be alone together and supervise them closely. Also, remember that peer abusers may be victims of abuse themselves.
- **Know what you are looking for.** Child abuse can take many forms including:
 - **Harm or threatened harm** to a child's health or welfare can occur through nonaccidental physical or mental injury, sexual abuse or sexual exploitation or attempted sexual exploitation.
 - **Sexual abuse** may be perpetrated by an adult or another child and includes the employment, use, persuasion, inducement, enticement, or coercion of any child to engage in, or having a child assist any other person to engage in, any sexually explicit conduct or any simulation of the conduct for the purpose of producing any visual depiction of the conduct; or the rape, molestation, prostitution, or other form of sexual exploitation of children, or incest with children as those acts are defined by Alabama law. Sexual abuse also includes any activity that is meant to arouse or gratify the sexual desires of the perpetrating adult or child. Sexual abuse may or may not involve touching.
 - **Sexual exploitation** includes allowing, permitting, or encouraging a child to engage in prostitution and allowing, permitting, encouraging or engaging in the obscene or pornographic photographing, filming, or depicting of a child for commercial purposes.
 - **Negligent treatment or maltreatment** of a child includes the failure to provide adequate food, medical treatment, supervision, clothing, or shelter.
- **Err on the side of caution.** In deciding whether to report an incident or situation of suspected abuse or neglect, it is not required that you have proof that abuse or neglect has occurred. Any uncertainty in deciding to report suspected abuse or neglect should be resolved in favor of making a good faith report.

Steps to Report Child Abuse

1. **Immediately** report the information to The University of Alabama Police Department at **205-348-5454**.

Your oral report should include *all available information* regarding the known or suspected abuse or neglect, including, but not limited to: the name of the child, the child's whereabouts, the names and addresses of the parents, guardian, or caretaker for the child, and the character and extent of the injuries. The report should also contain, *if known*, any evidence of previous injuries to said child and any other pertinent information that might establish the cause of such injury or injuries, and the identity of

the person or persons responsible for the same. However, you should not delay making a report to gather this information.

2. Do not directly question or solicit information from the child or from the person suspected of improper behavior. Likewise, do not delay making a report to gather evidence. That is not your role; the role of investigation lies with city, county, and state officials.
3. In addition to making an oral report, you must also complete a [Child Abuse or Neglect Report Form](#) and deliver the same to the UA Police Department. It shall be the responsibility of the UA Police Department to notify University officials of the suspected child abuse and to coordinate the investigation with local law enforcement. University officials include, at a minimum, the President, Provost, Vice President for Finance and Operations, General Counsel, Executive Director for Institutional Compliance, and Director of Risk Management. It shall be the responsibility of the University President to notify the Board of Trustees of the incident. Further, it shall be the responsibility of the UA Police Department to either report the incident to the State of Alabama Department of Human Resources or to ensure that the local law enforcement agency has made the report. The UA Police Department shall advise the reporter that such report has been made. Finally, the UA Police Department shall be responsible for maintaining all records and reports related to the incident and to brief University officials as needed.

VI. Wrapping Things Up

Legal claims against the program can come in years or decades after the event. That means that it is very important that records are kept and maintained in a manner that would make them easily accessible, if needed.

At the conclusion of the activity or program, submit the following items to youthprotection@ua.edu:

- Final list of participants;
- Copies of all waivers and medical documentation including medication forms, physician's instructions, or medical clearance forms; and
- Records of any incidents, injuries, or accidents that may have occurred during the activity or program.
- Finalized version of participant handbooks and parent communications.

VII. Accountability

Individuals violating this UA policy, or the requirements of this Guide will be held accountable for their actions, which may include, but are not limited to:

- Volunteers are subject to reprimand or loss of volunteer status;
- Students are subject to the Code of Student Conduct;
- Faculty, staff and student employees are subject to corrective action up to and including termination;
- Unit level sanctions, and;
- Third-party providers are subject to punitive actions under the terms of their contract agreement, up to and including termination of contract.

Site visits may be coordinated by Compliance, Ethics, and Regulatory Affairs to promote compliance. Any suspected violation of approved program guidelines or University policy will be subject to investigation by the appropriate University officials. Colleges, units, and individuals must participate in site visits as required.

Programs that are not in compliance will be reported through the escalation process defined by their College or Division.

VIII. Reporting and Investigations

Cases of known or suspected child abuse or neglect should be reported in accordance with the UA [Child Abuse Reporting Policy and Procedures](#). Investigations of allegations of child abuse or neglect will be conducted in accordance with the investigatory protocols of children service agencies, local law enforcement agencies, and/or the University.

The University of Alabama retains the right to modify or make exceptions to these guidelines at any time based on business need. This guide is not intended to be a set of inflexible requirements, nor is it intended to limit the appropriate discretion of officials as warranted by the individual circumstances of an individual or situation.