



Guide for Third-Party Youth Programs

THE UNIVERSITY OF
ALABAMA[®]

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

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Compliance, Ethics, and Regulatory Affairs

Box 870107, 2810 Capital Hall

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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 External Entities/Third-party 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 External Entities/Third-party Programs carry the same definitions when used herein. All areas/programs are still subject to all other relevant UA policies and procedures, including the [Child Abuse Reporting Policy and Procedures](#) and the [Facilities and Grounds Use Policy](#).

Except for the exclusions listed in this policy, all third-party Youth Programs, including any third-party virtual programs making use of University systems or involving University personnel in their role as a University employee, are within the scope of this policy. This includes, but is not limited to, activities or programs that include minors that operate on campus or in University facilities, including, but not limited to, overnight programs, instructional programs, day camps, academic activities, and sports camps.

This policy does not apply to:

- Events or programs offered by an external entity in which the minor is accompanied by a parent, guardian, teacher, or coach at all times. (This exception does not apply to virtual programs.)
- 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. Program Sponsor

A member of University personnel or a UA department must sponsor a third-party Youth Program for the program to be held on UA campus. The Program Sponsor maintains responsibility for the program throughout the registration process, during the program activities, and until the program has ended. As such, the Program Sponsor is expected to:

- Submit the Contract Request form;
- Submit the program's registration for activities;
- Assist the Program Director in ensuring that all staff complete required training and background checks;
- Assist the Program Director with understanding their obligations under UA policies;
- Submit any Appeal Request Forms if a program is denied;
- Serve as a point of contact for questions, complaints, or issues that arise related to the third-party program before, during, or after the program dates, or any issues that impact future programs.

2. Agenda

The first step in developing the program is to plan 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.

3. 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 designating a Program staff

member to serve as the emergency contact 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 will handle children with behavior issues that need to be addressed away from the rest of the group? If parents must be called to pick up the child, who will 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.

4. Housing

Accommodations

Housing arrangements will be coordinated as part of the contracting process. Available dates run from late May through the end of July, and space is allotted on a first-come, first-served basis.

An initial 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, with a final list including any additional attendee's due no later than three business days prior to the arrival date.

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.

5. 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 in the contract. 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](#).

6. 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 the 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.

7. Waivers

Each program participant and program staff member must complete and submit a UA Liability Release in addition to any forms issued by the third-party program. Programs managed by external entities should use the [Youth Protection Program: Liability Waiver for Third Party Programs](#) form.

8. 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 so that the program can secure medical assistance for a participant should the need arise. This information 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 shall occur prior to participant's registering for the activity.

In addition, some programs, specifically athletics programs, may have other documentation related to a participant's health status and potential 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 comply with the procedures for securing and distributing medications as described in this guide 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 in advance. 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 (OTC) 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 times 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.

Program staff should review participants' medication information in advance to be familiar with when medications are needed. **It is the participant's responsibility to contact staff for their medications, but staff should 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 provide 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 the parent or guardian will be contacted, 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. 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 submit to the Program Coordinator at the end of the program, who will forward 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 348-RIDE if in service. 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 requires 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

9. 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, the program director, medical professionals and other campus partners.

The third-party entity will be responsible for making accommodation arrangements. Contact CERA if assistance is needed with making physical access arrangements or if housing arrangements are needed.

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

10. Documentation Information

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 Agreement (PUA)

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 Waiver for Third-Party Programs](#).

Background Checks

Third-party entities are responsible for obtaining background checks for all program personnel. See the [Program Staff - Background Checks](#) section for more information on the background check certification process.

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.

In accordance with 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.

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.

11. 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.

12. Participant Registration Portal

The University maintains a contract with Ryzer Events for a full-service participant registration platform. Programs interested in utilizing this platform should contact CERA for approval. Conditions of usage, including administrative fees, etc., must be outlined in the contract.

13. Parent Communication

It is an expectation that parents will be given general information about program activities occurring on campus. It is recommended that the following information be provided:

- 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](#) is available to assist programs in developing a single communication piece that may be distributed to parents. The template may be used as a guide to customize a version appropriate for third-party programs.

14. 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. Any plans for merchandise sales must be disclosed in the contract.

15. Marketing Materials

Use of University logos and trademarks is strictly prohibited unless specifically authorized through the contracting process.

16. 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. Contracting and Program Registration

1. Contract

All third-party youth programs must have a contract with The University of Alabama in order to hold activities on campus. Third-party youth programs will not be approved to move forward until a contract is finalized. To initiate a contract, a [Contract Request Form](#) should be submitted. The request will be reviewed based on approved UA criteria and space availability for the proposed start date of the program. If the contract request is approved, a program registration must be initiated and completed successfully (see below). If the contract request is not approved, the submitter will be notified that the program cannot be offered at UA. In the event the third-party disagrees with the determination made by CERA, an appeal can be submitted via the [Youth Protection Appeals Request](#). The appeals request will be routed through the Assistant Vice President for Finance and Operations to an appeals committee. The committee will review relevant information, deliberate with appropriate officials, and render a decision. The submitter will be notified of the decision. See the contracting workflow for more details.

2. Registration

All activities or programs for or involving minors must be [registered](#) and final approval received before program activities begin. 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.
- An insurance certificate.
- [Background Check Certification Statement](#). See Section IV. Program Staff, Item 2. Background Checks
- 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](#).

Final approvals will be provided to the UA Program Sponsor via email.

The contract must be fully executed (both parties have signed) and the registration approved *prior* to the start date of the program.

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 paid or unpaid individuals.

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 in the 12 months preceding the start date of the program, they will receive an email from youthprotection@ua.edu that contains links to access training.

Program staff who fail to complete the training prior to the start of the program will not be approved to work.

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. For non-UA faculty, staff, or students, program staff will be required to set up an account using the [UA LMS Guest Portal](#). 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

All youth programs owned or operated by external entities that are required to be registered in accordance with the Youth Protection Policy must provide a completed [Background Check Certification Statement](#) certifying that all of the User's Event/Program staff (including all employees and volunteers) have been subjected 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. The external entity is responsible for managing this process and evaluating the results of background screenings. 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.

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. Currently, UA uses Social Intelligence.

If a program does not currently have a vendor to provide background screening services to these standards, CERA can provide assistance with contacting a UA approved vendor.

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 youth 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 planned 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, or injuries occurring during a program or activity for or including minors should 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 should 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 Compliance, Ethics, and Regulatory Affairs.

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 University 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.