

**UNIVERSITY OF HOUSTON-CLEAR LAKE  
ENVIRONMENTAL, HEALTH AND SAFETY DEPARTMENT**

		<b>Effective Date</b> October 23, 2020	<b>Number</b> L 12
<b>Subject</b> Policy Governing Minors at UHCL Laboratories			
<b>Reference</b> Policy Governing Minors at University of Houston Laboratories (UH-EHLS, Rev. 12/15), Minors Working in UH Laboratories Application Form (Rev. 5/13)		<b>Special Instructions</b> None	
<b>Distribution</b> Laboratory Faculty & Staff		<b>Reevaluation Date</b> Biannual	<b>No. Pages</b> 5

**I. PURPOSE**

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

Minors intending to visit the laboratory for purposes of gaining academic or research experience shall complete the Release and Indemnification Agreement, General Laboratory and Chemical Safety Training and Test, and the Minors Working in UHCL Laboratories Application Form.

**II. POLICY**

This policy applies to all University of Houston-Clear Lake laboratories, where hazardous materials may be present. These hazards may include, but are not limited to chemicals, biological agents, compressed gases, lasers, radiation, and/or research animals. Appropriate training and approval are required prior to entering labs and working with hazardous materials. Hazardous locations such as machine shops and other areas with potential for unusual hazards also fall under the purview of this policy.

**III. DEFINITIONS**

A. **Minor** – Persons at least 15 but below 18 years of age, that are not already enrolled as a student at UHCL.

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- B. **Laboratory** – For the purposes of this policy, “laboratory” refers to any part of the UHCL building used or intended to be used for scientific or technical activities, and which may involve hazardous materials or hazardous energy sources. These include teaching laboratories, research laboratories, and on-and off-campus clinical facilities and fieldwork locations where the approved educational activity is conducted under the supervision of a UHCL Sponsor.
- C. **Sponsor** – UHCL faculty member, Director or UHCL employee who is directly responsible for administering the program the minor intends to take part in.
- D. **Sponsoring Department** – UHCL Department of the sponsoring employee where the program is administered.
- E. **EHS** – UHCL Environmental, Health and Safety Department
- F. **IACUC** – Institutional Animal Care and Use Committee
- G. **IBC** – Institutional Biosafety Committee
- H. **IRB** – Institutional Review Board
- I. **RSC** – Radiation Safety Committee

**IV. PROCEDURES**

- A. Minors are not permitted in a laboratory without submitting application for review and obtaining written approval from the applicable University offices.
- B. Minors may apply to enter a UHCL laboratory as part of an educational research experience under the mentorship of a Sponsor using the “Minors Working in UHCL Laboratories Application Form”.
- C. The application must be completed by the Sponsor, forwarded to EHS for review of activities and recommendations before being sent to the applicable program chair and Department Chair, and/or College Dean (or designee) for approval.
- D. The Release and Indemnification Agreement “Consent Form” must be completed by the minor and their guardian, and submitted as part of the application.
- E. All proposed activities to be conducted by a Minor at University of Houston-Clear Lake laboratories must adhere to any requirements or restrictions imposed by EHS, the sponsoring department and other appropriate bodies within the University such as the IACUC, IBC, IRB and RSC.
- F. In addition, all required institutional trainings required by EHS, the sponsoring department, and/or program coordinator must be completed by the Minor prior to engaging in laboratory activities.
- G. The activities must be conducted under an appropriate supervisory plan developed by the Sponsor or designee and included in the application package.

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- H. When approved, such activities may not last more than 6 consecutive months. A new application must be submitted if the activity exceeds 6 months or if the experiment needs to be modified. For example, before substituting materials or scaling up an experiment.
- I. Minors are not permitted to work in high-risk laboratories such as those with particularly hazardous substances, radioactive material, biosafety level 2, etc. Minors are also not allowed to work in high risk activities such as working with highly reactive chemicals, plumbing compressed gases, moving compressed gas cylinders, or any other activity which could result in serious bodily harm.

**V. RESPONSIBILITIES**

- A. Sponsors or designees of the proposed laboratory or research group have primary responsibility to supervise all laboratory activities and to restrict activities, as necessary, depending on the nature of materials present in the laboratory (e.g. hazardous chemicals, research animals, radiological, biological, etc.). Responsibilities of the sponsor, the sponsoring department, the Minor, as well as EHS are further defined in this policy:

**1. Sponsor**

Faculty members and/or Research Center Directors sponsoring the “Minor” shall be responsible for the following:

- a. Submitting completed Application Form and Release and Indemnification Agreement “Consent Form” from Minor to EHS and applicable Department Chair for review, comments and approval.
- b. Arranging, in consultation with EHS for the Minor to obtain necessary safety trainings, well in advance, prior to commencement of proposed laboratory research activities.
- c. Forwarding approved Application Forms to the department’s business office for the participant’s UHCL identification. Individuals approved for participation will be assigned PeopleSoft number and email address to facilitate identification, UHCL Card ID access and communication from appropriate UHCL departments.
- d. Returning all approved documents to EHS.
- e. Arranging for (if needed), and ensuring payment for medical surveillance and immunizations as required for the Minor.
- f. Ensuring that the Minor is appropriately supervised at all times. Minors may not work alone in the lab.
- g. Notifying the Department Chair/College Dean and EHS if the nature/scope of the Minor’s activities changes.

**2. Sponsoring Department**

The Department sponsoring the “Minor” shall be responsible for providing administrative support to the Sponsor and Minor to ensure that intended experiences are realized.

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**3. Minors and Parents**

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

**4. EHS**

EHS shall be responsible for the following:

- a. Reviewing the application forms and proposed research activities and advising the Sponsor before the Minor is notified of acceptance.
- b. Requiring trainings and providing such in a timely manner to facilitate the objective of the program.
- c. Reviewing any change in scope and providing advice to the Sponsor.
- d. EHS may inspect the proposed laboratory where the Minor is applying to before commencement and at any time while such activity is in progress.
- e. All laboratories determined by EHS as conducting higher-risk activities will be inspected prior to the commencement of the Minor’s activities.
- f. EHS has the authority to suspend the Minor’s laboratory activities if deemed unsafe, if safety deficiencies are not corrected, or if there are other violations to stipulations made by EHS or other institutional compliance bodies. The IACUC, IBC, IRB, RSC or any other institutional compliance office or designee have the authority to approve and oversee research in their areas of responsibility, and to suspend activities when such action is deemed unsafe or inappropriate.

**VI. Appendix 1 – Release and Indemnification Agreement**

This form must be completed by the minor and their parent/guardian. The form is located on the UHCL EHS website at <https://www.uhcl.edu/about/administrative-offices/environmental-health-safety/documents/releaseandindemnificationagreement2013.pdf>. The form can be filled out in a web browser and then downloaded or printed.

**VII. Appendix 2 – General Laboratory and Chemical Safety Training**

A copy of the training PowerPoint shall be made available to the minor for review, and the test given in person by their parent/guardian or the faculty sponsor. The training is available at <https://www.uhcl.edu/about/administrative-offices/environmental-health-safety/lab-safety>. The test questions will be sent to the sponsor after application is received. A grade of 90 is required

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to pass. If less than 70, the material should be reviewed again and the test retaken. If above 70, missed questions may be reviewed with the test administrator.

**VIII. Appendix 3 – Laboratory Safety Policy Acknowledgment (Procedure L01)**

The Laboratory Safety Policy must be reviewed and signed and returned with the application. It may be found at <https://www.uhcl.edu/about/administrative-offices/environmental-health-safety/lab-safety> in the Lab Procedures section.

**IX. Appendix 4 - Minors Working in UHCL Laboratory Application Form**

Complete the Application located at <https://www.uhcl.edu/about/administrative-offices/environmental-health-safety/documents/l12a4-minors-in-labs-application-2020.docx>. and submit to [EHS@uhcl.edu](mailto:EHS@uhcl.edu) along with the Release and Indemnification Agreement and lab safety policy acknowledgement.

**X. APPROVAL**

  
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Director of Environmental, Health & Safety

Date: October 23, 2020

**XI. REVISION LOG**

Revision Number	Approval Date	Description of Changes