

Division of Administrative Affairs

ENVIRONMENTAL HEALTH AND SAFETY

Policy #P&P-02 MINORS IN RESEARCH LABORATORIES OR ANIMAL FACILITIES

Version #3

Effective: 05/18/2023 | Revised: 04/10/2023

1. PURPOSE:

The purpose of this policy is to identify under what circumstances and/or conditions minors will be allowed to visit, work or conduct research in FAU research laboratories where hazardous materials are used or hazardous procedures are conducted, including animal facilities. These guidelines are necessary to help protect a minor's health and safety and to provide reasonable measures to prevent harm arising from potential exposure to hazardous agents or conditions.

This policy covers all FAU research laboratories where hazardous materials are used or hazardous procedures are conducted, animal facilities, animal procedure rooms, and animal housing areas.

This policy is directed to include all persons under age 18 whether students, employees or volunteers.

2. POLICY STATEMENT:

Persons under the age of eighteen years are not permitted to work or volunteer in FAU laboratories without full compliance with this policy including, but not limited to, parental consent, proper training, and medical surveillance as appropriate to the work being performed.

3. CONCEPTS AND DEFINITIONS:

- 3.1. "Laboratories" are rooms in which hazardous chemical, radiological, or biological materials are handled or stored.
- 3.2. Minor" means any person who has not attained the age of 18 years.
- 3.3. "Principal Investigator/Sponsor" means the person who is responsible for the research project or activity as well as the oversight of the participants in the research or activity, including any minors.

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- 3.4. "Supervision" means management by overseeing the performance or operation of the person or group at all times in the laboratory or animal facility.
- 3.5. "Volunteer" means any person who provides services to FAU with no monetary or material compensation.

4. RESPONSIBILITIES:

- 4.1. Lab owners and principle investigators are responsible for ensuring full compliance with this policy.
- 4.2. Principal Investigators will complete the Minors Research Proposal Registration Form and submit to EH&S at ehs@fau.edu. Principal Investigators will also ensure completion of the Parent/Legal Guardian Informed Consent Form package by the parent or legal guardian of the proposed minor and forward to EH&S at ehs@fau.edu.
- 4.3. Minors working in laboratories and research facilities are responsible for full participation with the requirements of this policy.
- 4.4. Environmental Health and Safety is responsible for the enforcement of this policy.

5. PROCEDURES:

- 5.1. Minors who participated in a previously approved official FAU program are not allowed in FAU research facilities for any reason unless they have current approval. Approvals are based on specific projects and time frames of projects.
- 5.2. Minors are allowed to work or conduct research in laboratories (except as prohibited in 5.3 below) if the following requirements are met in full:
 - 5.2.1.The minor is supervised by the Principal Investigator/Sponsor or his or her designee at all times while in the laboratory and never left alone.
 - 5.2.2.The minor complies with all safety training and medical monitoring requirements required for the laboratory and/or fieldwork to be performed.
 - 5.2.3.The FAU EH&S Policy titled; Minors in Research Laboratories and Animal Facilities has been read and understood. The Parent/Legal Guardian Informed Consent form package has been reviewed and signed by the parent/legal guardian and minor and returned to EH&S by mail or by fax.
 - 5.2.4.A Minors in Research Proposal Registration Form is submitted to and approved by EH&S

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- and, if necessary, by the FAU Institutional Biosafety Committee and the Institutional Animal Care and Use Committee, if animals are involved.
- 5.2.5.Hazard specific safety training is completed by the Principal Investigator/Sponsor with the minor as approved by EH&S. All volunteers must complete laboratory safety training prior to work in laboratories.
- 5.2.6.Personal protective equipment, specific to the hazard, is provided to the minor with instructions for use and disposal. At a minimum, and without exception, minors must wear safety glasses, lab coat, long pants/slacks, and closed-toed shoes at all times while in a laboratory. Gloves must be worn when handling hazardous materials.
- 5.2.7.The laboratory is in full compliance with all applicable FAU safety programs and regulations, including full resolution of laboratory inspection findings.
- 5.3. Enrollment in one or more of the FAU Occupational Health programs may be required, depending on the specific hazards associated with the laboratory or work. Medical surveillance evaluations that may be required include, but are not limited to:
 - 5.3.1.Bloodborne pathogens (medical clearance and offering hepatitis B vaccine)
 - 5.3.2. Respiratory protection (medical clearance and fit testing)
 - 5.3.3. Animal contact (medical clearance and offering appropriate vaccines)
- 5.4. All minors are prohibited from working with the following:
 - 5.4.1. Any biological agents designated for work in BSL-3/ABSL-3 or higher.
 - **5.4.2.** Select agents, controlled substances, or explosives.
 - 5.4.3. Radioactive materials or radiation (X-rays, gamma rays, etc.) or lasers.
 - 5.4.4. Acute toxins (i.e. mammalian LD-50 of \leq 100 ug/kg body weight).
 - **5.4.5.** Animal work that involves any of the above materials or equipment.

6. ENFORCEMENT:

Oversight activities for this program are conducted by Environmental Health and Safety. The presence of minors in laboratories or animal facilities which are not in compliance with this policy will be reported to unit leadership and Human Resources for further action. The lab owner will be required to immediately remove the minor from the applicable work area until compliance with this policy can be completed.

7. RELATED INFORMATION:

Policy #P&P02 – Minors in Research Laboratories and Animal Facilities

- Minors Research Proposal Registration Form
- Parent/Legal Guardian Informed Consent Form Package

Approved and issued by order of:

Wendy Ash Graves

ENVIRONMENTAL HEALTH AND SAFETY

DATE: 5/18/23

POLICY MAINTENANCE SECTION

Last Revision Date	5/18/2023	
Last Revision By	W. Ash Graves	
Next Review Due	05/18/2026	
Review Frequency	3 years	
Version	3.0	
Time-sensitive Items		

THIS POLICY RESCINDS ALL OTHER WRITTEN DIRECTIVES REGARDING THIS TOPIC.

8. RECORD OF CHANGES/STATUS CONTROL:

Version	Date	Summary of Changes	Reviewed By
2.0	05/18/2023	Revised to include medical monitoring in requirements and parental consent.	W. Ash Graves
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