“Our lives begin to end the day we become silent about things that matter.”

- Martin Luther King Jr.

“Unless someone like you cares a whole awful lot, nothing is going to get better. It’s not.”

- The Lorax
Bi-Annual Minors Program
Coordinator Information Session

April 25, 2018
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Part 1: Policy & Procedure Review
Introductions

• Your name
• Your primary role in your Department/School
• How many and what type of minor programs are you responsible for;
  • Academic year, summer programs
  • Local, national, international population
  • Day or residential
• How long have you been in the MPC role?
Agenda

- History of PoM at Boston University
- Description and responsibilities of MPC
- How to comply with this responsibility
- MPC Resources
- Contacts
- Questions
Protecting Minors at BU Timeline

- **September 2013:** Protection of Minors Task Force created
- **July 2015:** PoM Policy approved and implemented
  - Guidelines, requirements, reporting abuse
- **September 2015:** Minors Program Coordinators appointed
- **January 2016:** PoM Steering Committee created
  - Stays current with legal changes, responds to issues and feedback received from MPCs
Purpose of PoM Program

- Boston University, as part of its mission, promotes and engages in many programs, events and activities that involve Minors throughout our campuses.

- The purpose of this policy and program is to ensure protection of Minors engaged in programs, events and activities provided or endorsed by BU.
MPC Role Description

- Appointed by your Dean as the liaison for all Minor programs in your school/department
- Point of contact for any Program Operators who are running Minor programs in your department
- Work with other PoM partners at BU to ensure all aspects of your programs are covered appropriately
- Develop partnerships with other MPCs to create best practices across Boston University
MPC Role Responsibilities

- Determine if the POM policy applies to each program
- Manage and update each program’s information with HR
- Review Third Party agreements if applicable
- Process background checks & POM training requests for all BU personnel who will be interacting with Minors
- Ensure all BU personnel receive POM training prior to interacting with minors
- Ensure waivers of liability are completed by parents/guardians of all Minors
- Track compliance and maintain records
Resources

- **BU Safety Site – Protecting Minors**
  - [www.bu.edu/safety/protecting-minors](http://www.bu.edu/safety/protecting-minors)

- **BU Policies Site**
  - [www.bu.edu/policies](http://www.bu.edu/policies) (search “Protection of Minors”)

- **PoM SharePoint Site**
  - Email pom@bu.edu for access

- **MPC Toolkit**
  - PDF document with resources, forms, documents needed for MPC role
  - Will be emailed out after meeting, also available on SharePoint
Does the Policy Apply?

• Does the program involve Minors?
• Minors Definition:
  • For the purposes of this policy, Boston University considers a Minor to be any person under the age of 18 who is not a matriculated Boston University student and who is unaccompanied by a parent or legal guardian

• “Which Policy Applies” flowchart (pg. 5 of MPC Toolkit)
MINORS PROGRAMS AT BOSTON UNIVERSITY: WHICH POLICY APPLIES?

PLEASE NOTE: This document is intended to serve as a tool to help you determine which policy/policies your minors program falls under. It is not a comprehensive guide to the compliance requirements for each policy. For more information regarding each policy, its requirements, and who to contact with questions, please follow the link provided in the respective box at the bottom of the page.

START

Does the program involve minors (any person under the age of 18 and not a matriculated BU student)?

NO

No policy applies.

YES

Are the minors going to be supervised by a parent/guardian/teacher for the duration of the program?

NO

Will the minors be working in a laboratory at BU?

YES

Is the program sponsored by a non-University organization or off-campus entity?

NO

YES

Will the minors be working in a laboratory at BU?

NO

Will the minors be acting as human research subjects?

YES

NO

Is a third party involved in the operation of the program?

YES

NO

The program is subject to the Policy on Minors in Labs ONLY. See http://www.bu.edu/researchsupport/forms-policies/policy-on-minors-in-laboratories/.

The program must comply with the Protection of Minors Policy and the Policy on Minors in Laboratories. See http://www.bu.edu/researchsupport/forms-policies/policy-on-minors-in-laboratories/.

The program must be approved by the CRC or BMC/BUMC Institutional Review Board. See https://www.bu.edu/researchsupport/compliance/human-subjects/.

The program must comply with the Protection of Minors Policy and Procedures, and a Third Party Contract must be in place. See http://www.bu.edu/safety/protection-minors/.

The program must comply with the Protection of Minors Policy and Procedures ONLY. See http://www.bu.edu/safety/protection-minors/.
Manage Program Data

- Program Name
- Primary Program Contact Name & Email
- BU Program? (Yes/No)
- # of Minors Involved
- Residential? (Yes/No)
- Age Range of Minors
- #/Frequency of Sessions
- # of Program Staff
- Any other relevant info about the program

Send new and/or updated program info to pom@bu.edu.

ALSO KEEP YOUR OWN RECORDS!!!
Waivers of Liability

• **Ensure waivers of liability exist and are completed for all programs with Minors**
  • Use waiver template on pg. 14 of MPC Toolkit (also available on BU policies site)
  • If you need to include other program specific information (i.e. laboratory), then...
    • Work with your HR Business partner to determine if the waiver should be reviewed by OGC or Risk Management
Training for Working with Minors

- REQUIRED for all BU personnel who will be interacting with minors
- Two main methods;
  - Online Training
  - Policy/Document Review
- When to use which one?
- How to confirm training has been completed?
Option 1: Online EduRisk Training

• Customized, interactive online course that covers:
  • Guidelines for interacting with minors
  • Warning signs for abuse or neglect
  • How to report suspected abuse or neglect
• Takes ~30 minutes to complete
• *Should be used for all BU programs*

How to Access the Training:
• Email pom@bu.edu for training instructions
• Send learners instructions to self-register and complete the training
Option 2: Policy/Document Review

- Alternative to online PoM training
- Learners can read through the Protection of Minors Policy & Procedures and sign the “Protection of Minors Certification of Training” document (pg. 16 of the Policy & Procedures PDF)
- Form should be submitted to Minors Program Coordinator

*This method should only be used for non-BU or Third Party programs*
Policy Document Review
Protection of Minors Certificate of Training
(page 16 of Protection of Minors Policy/Procedures PDF)

I have read and understand the Boston University Policy regarding Protection of Minors and completed the training below. I agree to comply with the Boston University Protection of Minors Policy and Procedures and, if applicable, with my obligations as a Mandated Reporter under Massachusetts law.

If I know of or suspect abuse or neglect of a Minor, I agree to immediately notify the Boston University Police Department and the Minors Program Coordinator for my program or, if none, the program supervisor or director, dean, or vice president responsible for my program.

<table>
<thead>
<tr>
<th>Program Participation</th>
<th>Services, Programs or Activities</th>
<th>Training Level</th>
<th>Training Completed</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Residential services, programs or activities operated by the University on Campus</td>
<td>Online Training</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Non-Residential services, programs or activities operated by the University on Campus</td>
<td>Online Training</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Services programs or activities operated or formally facilitated by the University off-Campus</td>
<td>Online Training</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Services, programs or activities not operated by the University, but in which members of the University community participate in their capacity as students, faculty or staff</td>
<td>Policy/Document Review</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Third Party services, programs or activities</td>
<td>Policy/Document Review</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Minor visitors to campus who are not part of formal services, activities or programs or are accompanied by their parents or teachers</td>
<td>None required</td>
<td></td>
</tr>
</tbody>
</table>

Signature: [Signature]
Date: [Date]

Printed Name: [Printed Name]
Program/College/Activity Area: [Program/College/Activity Area]
Tracking Training

2 Options for Online EduRisk Training:
1. Ask learners for a copy of their completion certificate
2. Email pom@bu.edu to request completion reports for online training
   - Provide list of names & email addresses
   - Also provide date that instructions were sent

For policy/document review, keep track of certification forms

- If training is not completed, unsupervised contact with minors cannot be permitted!!
Background Check Process

Ensure cleared background checks are received prior to permitting participation in activities with Minors – refer to Policy to determine who requires a background check.

- Does a cleared background check exist for faculty/staff? If yes, then check if it’s still valid (email hr@bu.edu).

<table>
<thead>
<tr>
<th>Category</th>
<th>Frequency of Background Check</th>
</tr>
</thead>
<tbody>
<tr>
<td>Boston University Student - Full-time or part-time matriculated</td>
<td>Every 3 years</td>
</tr>
<tr>
<td>Boston University Student - Part-time non-degree</td>
<td>Annually</td>
</tr>
<tr>
<td>Faculty/Staff Full-time</td>
<td>Every 3 years</td>
</tr>
<tr>
<td>Faculty/Staff Part-time</td>
<td>Annually</td>
</tr>
<tr>
<td>Volunteers (excluding BU faculty, staff and students)</td>
<td>Annually</td>
</tr>
</tbody>
</table>
Background Check Process

1. *New* Minors Program Coordinator or other authorized individual must complete training and additional steps required for authorization indicated [here](MPC Toolit pg. 13)

2. Distribute and collect the completed:
   - CORI Acknowledgement Form
   - Disclosure and Acknowledgement Form
   - Release and Authorization form
     - Verify forms are completed
     - Review government-issued ID in person
     - Sign page two of the CORI Acknowledgement Form
     - Complete Protection of Minors Online Request Form; deliver forms to HR
Background Check Process (cont.)

3. MPC or authorized individual delivers completed forms in person to HR.
   • If the CORI form must be sent via email, send to hr@bu.edu via DataMotion SecureMail, and shred the original documents.

4. HR Service Center sends forms to background check vendor, CSI

5. CSI sends cleared results to requestor via email
   o Adverse results go directly to HR, will reach out to requestor upon review

“Background Check Checklist” located on pg. 11 of MPC Toolkit
Results of Background Check

- MPC or authorized individual
  - Notify Program Operator that cleared background check is received
  - Retain Background Check Transmittal Form
- If background check is not completed or not cleared
  - Notify Program Operator that employee may not be alone with minors at any time
  - Update Program Operator if there is a change to this
- Keep track of background check results and expiration dates
  - Optional: Use Background Check Tracking Document
Tips on Handling CORI/SORI Information

• Do not leave documents containing confidential information in open areas (desks, photocopiers).
• Keep paper files in a locked file cabinet.
• Keep electronic files on a secured drive.
• If the CORI form must be sent via email, send to hr@bu.edu via DataMotion SecureMail, shred the original documents, and delete email messages.
• Hand deliver CORI/SORI forms to HR.
• Destroy paper copies after delivering to HR.
• Do not keep copies of CORI/SORI forms.
Contacts

• Training instructions, completion reports, update program information
  • HR Protection of Minors, pom@bu.edu

• Policy interpretation, waivers of liability, Third Party agreements:
  • Your HR Business Partner (http://www.bu.edu/hr/home/contacts/)

• Background checks:
  • HR Service Center, hr@bu.edu, 617-353-2380

• Third Party agreements, requests for policy exemption:
  • Office of Risk Management, riskhelp@bu.edu, 617-353-3020
Remember...

- Keep track of records for compliance:
  - Background checks
  - Training
  - Waivers of liability
- Maintain files indefinitely
Questions?
Part 2: Updates & Discussion
Updates - Agenda

• Updated MPC Toolkit – now posted on Policies site in addition to SharePoint site
• Updated CORI Acknowledgment Form (2/1/18)
• Background check authorization for MPCs and “other authorized individuals”
Updated CORI Acknowledgment Form

- Effective 2/1/2018
- Updated on POM Safety site and SharePoint Site
- Changes:
  - Salary question
  - Includes Notary option (no more separate form)
Background Check Authorization

- MPCs and Program Operators must follow a series of steps in order to become authorized to
  
  A. Sign off on CORI forms
  
  B. Receive “all clear” notification from CSI

- POM and HR keep a log of MPCs and POs, whether or not they are authorized, and which authorizations they have

- If we do not have you on record as authorized and we receive a CORI request from you, we will ask you to complete these steps
Authorization Process (Detailed in MPC Toolkit, pg 13)

To Sign Off on CORI Forms:

MPCs
- Review Mass State Presentation & BU Presentation (located on BU Safety site)
- Email pom@bu.edu and hr@bu.edu indicating completion

Program Operators
- Same steps as above, plus written authorization from MPC

To Receive “All Clear” Notifications from CSI:

MPCs
- Same steps as above – nothing additional required

Program Operators
- Same steps as above, plus additional written authorization from MPC
Questions/Discussion

• What other questions do you have for us/your fellow MPCs?
• What can we work on next?