

Policy on Minors in Laboratories

Purpose

The purpose of this document is to define and clarify the policies pursuant to which minors will be allowed to access and conduct academic research in the laboratories at Boston University (BU).

Scope

In keeping with the institution's mission of education and outreach, BU provides opportunities to individuals under the age of eighteen ("minors") to gain experience in research laboratories for educational purposes. This policy describes the requirements that must be fulfilled before minors, such as those participating in short term summer internship programs and other mentoring programs will be allowed to participate in different levels of laboratory activities. Principal Investigators or designees of the sponsoring laboratory have primary responsibility to supervise all laboratory activities and to restrict activities, as necessary, depending on the nature of materials (e.g. hazardous chemicals, radiological, biological) found in the lab. The goal of this policy is to help protect the health and safety of the minor and to prevent injury arising from a potential exposure to harmful agents or conditions.

Definitions:

- Minor – any person who has not attained the age of 18 years.
- BSL3 – Biological Safety Level 3
- BSL4 – Biological Safety Level 4
- Select Agent Laboratory Facilities – Laboratories approved by CDC or USDA to possess, use or store biological agents and toxins classified as Select Agents under CDC 42 CFR Part 73; APHIS 7 CFR part 331 and 9 CFR Part 121.
- AVP-RC – Associate Vice President for Research Compliance
- EHS – Environment Health and Safety

Areas Covered by Policy:

This policy applies to all "Hazardous Areas" which is understood to include:

- "Laboratories" – defined as rooms in which hazardous chemicals, radiation, or biological materials are handled or stored.
- Machine rooms, electrical rooms, equipment rooms, or other rooms with unusual hazards

General Requirements:

- Minors are not allowed in a laboratory without written permission of Environmental Health and Safety (EHS). Requests for permission must be provided in writing to EHS using the form in Appendix A. For questions and approval processing, contact EHS at 617-638-8830 at BUMC and 617-353-4094 at CRC.
- Minors must not be left alone or unsupervised while in the laboratory.

- Minors must be at least 15 years of age in order to be allowed access to laboratories with hazardous chemical, radioactive and biological materials for extended visits for education-related reasons.
- Minors below 15 years of age are permitted access to laboratories with hazardous chemical, biohazard or radiation only for short-term visits, such as a high school or middle school tour of a laboratory. Adequate adult supervision must be provided at all times during the visit by the program, the department, the unit or the laboratory sponsoring the visit.
- All minors are prohibited to work or conduct studies in the following areas:
 - BSL3 and BSL4 facilities
 - Select Agent laboratory facilities.
 - Facilities that house or conducts procedures on research animals, unless the minor is otherwise given special permission by the Associate Vice President for Research Compliance (AVP-RC) and the Animal Facility and has completed requisite medical clearance and training requirements.
 - Areas that require operation of equipment or machinery that requires specialized training, skills, or personal protective equipment, such that an individual who is not trained or skilled could incur serious injuries.
- All minors are prohibited from working with radioisotopes, high hazard chemicals or infectious agents or materials.
- All minors must complete the Laboratory Safety Training provided by EHS prior to conducting studies in the laboratory.
- All minors' access to the laboratories shall be terminated upon completion of the program in which the Minor has enrolled or participated.

Requirements of the Principle Investigator/Sponsor:

- Ensure that the laboratory hosting the minor(s) is in compliance with all safety policies, procedures, standards and regulations.
- Complete the “*Application for Student Minors to Enter Boston University Laboratories Form*” (APPENDIX A) and submit for approval.
- Ensure and verify that the “*Parental Consent Form for Minors Entering a BU Laboratory Form*” (APPENDIX B) has been completed and received prior to allowing the minor into the laboratory.
- Notify appropriate oversight committees such as the Institutional Biosafety Committee (IBC) or the Radiation Safety Committee (RSC) in advance if the minor's presence in the lab results in the addition individuals to an approved protocol..
- Ensure that the minor is directly supervised by the PI or designee.
- Ensure that minors have completed the required Laboratory Safety Training by EHS prior to allowing access to the laboratory.
- Ensure that minors have been provided agent and laboratory SOP training as applicable, by the PI or designee prior to allowing access to the laboratory.

- Make available and provide appropriate personal protective equipment and if appropriate, radiation film badge. (The NRC limits persons under eighteen years of age to 10% of the exposure to those eighteen years of age and older.)

Requirements of the Minor:

- Provide the completed and signed ***Parental Consent Form for Minors Entering a BU Laboratory Form***” (APPENDIX B) to the PI or sponsor.
- Complete required Laboratory Safety Training through EHS before starting any work studies in the laboratory.
- As applicable, complete the agent and laboratory SOP training provided by the PI or designee.
- Abide by and follow laboratory Biosafety Level work practices and procedures implemented in the laboratory.
- Use appropriate personal protective equipment when working in the laboratory.
- Report the accidents or injuries to the PI or designee.
- Report accidents or injuries immediately to the Research Occupational Health Program (ROHP) for evaluation and treatment at 617-414-7647.

APPENDIX A

Application for Student Minors to Enter Boston University Laboratories

This form should be completed and submitted by the Program Director or the PI who is sponsoring the minor who wishes to participate in an educational opportunity in a Boston University Laboratory. The proposed activities must not begin until approval is received and the required trainings are completed.

SECTION 1 – Faculty Sponsor or Program Director to complete this section

Name and Department of PI:

Email address of PI:

Contact person for PI (if different):

Name of Student:

Date of Birth:

Age at the start of the proposed activities:

Address:

Relationship to PI (if applicable):

Name of the BU sponsored program organizing the activity, if applicable:

Program Director or Program Head (if applicable):

Description of proposed activities and educational goals, including a list of chemicals and/or materials to be used by the student during the program:

NOTE: ongoing organized programs may alternatively attach their program summary document

Do the proposed activities involve any of the following? *Please answer all.*

Yes No Hazardous materials/activities (i.e. infectious materials, radioactive material, hazardous chemical) : (If Yes, please specify):

Yes No Human subjects

Yes No Animal research

NOTE: If you responded “Yes” to any of the above, please refer to Appendix B for the corresponding training requirements.

Location and description of the laboratory where the educational experience will take place:

Building: _____

Room:

Proposed stipend (if any): _____ Proposed start/end dates:

Person responsible for day-to-day lab supervision:

Supervisory plan for lab activities:

NOTE: Please include a description of the controls that will help to ensure the safety of the student (e.g., observation only, personal protective equipment, fume hood, biosafety cabinet).

Person responsible for ensuring that all training is complete before lab activity begins:

By checking this box, I certify that I have reviewed the Minors in Lab policy and will be responsible for following all policies and procedures related to the student's participation in the proposed educational activities. I have received a copy of the parental consent form available at [_____], signed by the student's parent or legal guardian. I understand that I will keep this document on file for at least 2 years, and will make it available for review upon request.

For EHS Use ONLY:

Approved

Denied

Special Conditions:

Signature

Date

APPENDIX B

Parental Consent Form for Minors Entering a BU Laboratory

Parent/Legal Guardian Name
Address
Address

Date

Consent and Release Form

Dear Parent/Legal Guardian:

This consent and release form is required as part of an application for _____ to participate in an educational program or work at Boston University in a research laboratory in the Department of _____. Your child will work under the direct supervision of _____ in _____.

Individual laboratories vary in the inherent types of potential hazards present. While participating in this program, your child may need to work with or around biological materials, chemicals, radioactive materials or other potentially hazardous materials. As part of [his or her] project, _____ will work with or perform the following:

Briefly describe proposed lab activities – include potentially hazardous materials the student will work with in the laboratory, as well as a specific description of any work involving animals that will be performed by the student.

All educational plans for minors in laboratories are reviewed by the Boston University Office of Environmental Health and Safety to determine that the project is appropriate for a minor student, that appropriate safety precautions are in place and all training requirements are identified and completed before the lab activity begins.

Boston University provides safety training to all personnel who may work with or in the vicinity of potentially hazardous materials – your child will be required to attend laboratory safety training, and may also be required to attend additional training sessions, depending on the nature of his or her particular project. If you have further question on these topics, please call Phone Number for EHS Point of Contact.

Sincerely,

Supervisor or Program Director
Contact Information

By signing this consent and release, I consent to the conditions as outlined above. In addition, I further understand that Boston University's facilities are being made available to _____ as an educational opportunity and that he or she is not a student, regular employee, or affiliate of Boston University. I further understand that Boston University laboratories may contain hazardous substances and equipment and that _____ may be subjected to potential risks that could result in illnesses or injuries. _____ and I understand these risks and assume them knowingly and willingly.

I agree, on behalf of my family, heirs and personal representatives, to assume all risks and responsibilities surrounding _____ use of and access to Boston University's laboratories. To the maximum extent permitted by law, I release, hold harmless and agree to indemnify Boston University, its officers, directors, faculty, staff, or agents from and against any claim, loss, or liability for injury to person or property which _____ may suffer, or for which _____ may be liable to any other person, during his or her use of and access to the laboratories resulting from any cause, including but not limited to, negligence by Boston University, its officers, directors, faculty, staff, students or agents.

Minor's Name (PRINT): _____
Parent's/Legal Guardian's Name (PRINT): _____
Parent's/Legal Guardian's Name (*Signature*): _____

Date: