



TEXAS TECH UNIVERSITY HEALTH SCIENCES CENTER

Operating Policy and Procedure

HSC OP: 73.15, Minors in Research Laboratories

PURPOSE: The purpose of this Health Sciences Center Operating Policy and Procedure (HSC OP) is to provide guidance and assistance in the proper placement of minors in Texas Tech University Health Sciences Center (TTUHSC) research laboratories or other research areas for the purpose of work, study, or other TTUHSC approved special programs and activities. For the purposes of this policy, a **minor is defined as an individual under the age of 18 years** who may be an employee (including student employees), student, or visitor (including a volunteer or guest of the institution). The TTUHSC has a responsibility to maintain a safe environment for its employees, students, patients, and visitors, some of whom may be minors.

REVIEW: This HSC OP will be reviewed on June 1 of each odd-numbered year (ONY) by the Director of Safety Services and the Vice President for Human Resources, with recommendations for revision forwarded to the Senior Vice President for Research by June 30.

POLICY/PROCEDURE:

1. Age Restrictions.

- a. Underage (minor) individuals often seek and acquire opportunities to study or work under the sponsorship of the TTUHSC or other sponsored educational programs. For safety reasons, the TTUHSC has established age restrictions for minors seeking to study or work in laboratory areas. No minor (including children of TTUHSC faculty or staff) is allowed in a TTUHSC laboratory, except in accordance with this policy.
- b. Minors below the age of 14 years. Minors below the age of 14 years are **not** eligible for laboratory study or work experiences, or allowed to be present in laboratories or other hazardous work areas at the TTUHSC, with the following exceptions and guidelines:
 - (1) Special observation only experiences may be arranged for minors (including those below the age of 14 years) through the TTUHSC institutional Office of Research. Safety Services must be notified in advance of such visits.
 - (2) Special participatory/educational experiences involving minors under the age of 14 years may be considered on a case-by-case basis by the sponsoring department, if authorized in accordance with section 3 below, provided that the minor is:
 - A. under the direct supervision of the sponsoring investigator,
 - B. not involved in any activities that could be considered "particularly hazardous," (see *Attachment B, Potential Hazards in Research Laboratories*) and
 - (3) For purposes of (1) or (2) above, all minors under age 14 must be properly supervised and accompanied by an adult while on TTUHSC grounds and within TTUHSC facilities.
- c. Minors of age 14 and 15 years. Minors of age 14 and 15 years may participate, if authorized in accordance with section 3 below, in laboratory study or work experiences

that do not include work in areas or occupations considered to be “particularly hazardous” as defined in 29 CFR 570, “Child Labor Regulations, Orders and Statements of Interpretation,” or that may be considered to be detrimental to their health or well-being, including, but not limited to, the following:

- (1) Any work in any workroom where ionizing radioactive materials or ionizing radiation-producing devices are present or used;
 - (2) Any work in any workroom in which the following conditions may exist:
 - A. Potential presence or use of “highly hazardous” biological or chemical materials as defined by the TTUHSC Institutional Biosafety Committee (IBC);
 - B. Potential presence of infectious diseases transmitted by an aerosol route;
 - C. Potential exposures to human blood, body fluids, tissues, or animals with infections potentially transmissible to humans;
 - D. Potential exposures to Level 3 or 4 biological agents (as defined by the Centers for Disease Control and Prevention, CDC);
 - E. Potential exposures to Level 3 or 4 chemicals (as defined by the Hazardous Material Identification System (HMIS) or National Fire Protection Association (NFPA) System);
 - F. Potential use of lasers or laser devices;
 - G. Hazards requiring special protective wear (not including latex or vinyl gloves, goggles, face shield, or dosimetry badges);
 - H. Potential presence or use of controlled substances;
 - I. Potential presence or use of select agents (as defined by the CDC and APHIS); and
 - J. Work in an area where there is a known risk of exposure to contagious diseases of human or animal origin.
- d. Minors of age 16 and 17 years. Minors of age 16 and 17 years may participate, if authorized in accordance with section 3 below, in laboratory study or work experiences that include work in non-hazardous jobs or activities. Minors of age 16 and 17 years:
- (1) shall not work directly with any “particularly hazardous” materials, as defined in section c. above.
 - (2) are prohibited from handling radioactive material source vials and must have prior written permission from the Radiation Safety Officer (RSO) to use other radioactive materials, including performing contamination surveys.
 - (3) are prohibited from working directly with highly hazardous materials, including, but not limited to, the following:
 - A. Select agents (as defined by the CDC and APHIS);
 - B. Controlled substances;
 - C. Highly hazardous biological or chemical agents (as defined by the TTUHSC IBC); or
 - D. Potentially infectious animals or agents.

- e. Individuals 18 years of age or older. There are no age-related restrictions on individuals of age 18 years or older.

2. **Operational Responsibilities**

- a. Minors shall be closely and directly supervised by the sponsoring investigator.
 - (1) All use of radioactive material by a RSO approved minor must be directly supervised by a trained adult TTUHSC staff member at all times, including performing contamination surveys.
 - (2) Failure to supervise the minor while using radioactivity will result in immediate suspension of the Authorized User's Radioactive Material Sublicense.
 - (3) The sponsoring investigator will serve as the Camp Operator for the purposes of satisfying the requirements of [HSC OP 70.59](#), Youth Camps (SB1414).
- b. Minors shall be provided with adequate and appropriate personal protective equipment, including dosimetry badges when required.
- c. Minors shall successfully complete all required laboratory and radiation safety training, as appropriate, and any site-specific training required by the sponsoring laboratory prior to commencing work activities.
- d. Under no circumstances will minors be allowed to work or study with or around radiation sources, biological agents, hazardous chemicals, equipment, or animals in manners that pose a risk to their health or well-being.
- e. Supervisors overseeing hazardous work areas or laboratories are specifically responsible for the safety of all minors who are approved under institutional guidelines as employees, students, or visitors in their areas, and for compliance with this policy.

3. **Authorization**

- a. A parent or guardian must give written consent for minors through age 17 to participate in laboratory study or work experiences, unless the minor is emancipated.
- b. The institutional Office of Research, sponsoring investigator and department chairperson must also authorize the participation in writing. Authorization will be granted only for recognized TTUHSC or other recognized sponsored educational programs.
- c. Attachment A – Minors in Laboratories Consent/Signature Sheet of this policy shall be completed and provided by the sponsoring investigator/department to Safety Services for approval prior to commencing the laboratory study or work experience. The original for each completed Attachment A will be forwarded to the Office of Research for final authorization by the Senior Vice President for Research. Copies will be maintained by the Office of Research and Safety Services, and the original will be returned to, and maintained by the sponsoring department/investigator.
- d. Departments authorizing minors to participate in laboratory study or work experiences for all or part of more than one day shall follow the requirements established in [HSC OP 70.59](#), Youth Camps (SB1414).

4. **Training Requirements**

- a. All minors authorized to participate in laboratory study or work experiences must complete the following training programs prior to commencing the study or work experience:

- (1) TTUHSC New Employee Safety Orientation Program (NESOP), Safety Training and Education Program for Students (STEPS), or Volunteer Orientation Program, as appropriate;
 - (2) TTUHSC Laboratory Safety Essentials;
 - (3) TTUHSC Radiation Safety Short Course (RSSC) (required for those individuals working in a radiation utilization area); and
 - (4) Site-specific safety orientation training (conducted by the sponsoring laboratory).
 - b. Minors participating in authorized special observatory experiences may be exempt from training requirements. Prior written approval and verification with the institutional Office of Research and Safety Services is required.
 - c. The sponsoring investigator and all department staff who have more than incidental contact with any minor participating in laboratory study or work experiences which last all or part of more than one day shall complete the Youth Protection Training required by [HSC OP 70.59](#), Youth Camps (SB1414).
5. **Authority Invoked by HSC OPs**
- a. Should there occur at any time a conflict between this policy and the policy or procedure as reflected in documents of a higher authority (e.g. Regents' Rules, federal law, or state law), the policy or procedure document of higher authority will prevail.
 - b. Should there occur at any time a conflict between this policy and the policy or procedure of any other written or oral policy statement developed by an operating unit at TTUHSC, this policy will prevail.
6. **Disclaimer Statement.** Texas Tech University Health Sciences Center reserves the right to interpret, change, modify, amend or rescind any policy in whole or in part at any time without the consent of employees.