



SAINT LOUIS  
UNIVERSITY

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## Policy on Minors in Laboratories

**Policy Number:** RC-007  
**Classification:** Research Compliance

**Version Number:** 2.0  
**Effective Date:** 09MAR2015

**Responsible University Official:** Vice President for Research

### 1.0 INTRODUCTION

Saint Louis University endeavors to provide for the safety and wellbeing of its students, faculty, staff, as well as visitors to its campuses. As part of its teaching and research mission, the University is committed to facilitating the education of youth who have scientific interests through mentoring programs. Such programs may include shadowing, volunteer work in research laboratories, and tours of research facilities that may include demonstrations by SLU faculty. To assure the safety of minors visiting Saint Louis University laboratories and to minimize risks to them, the University has established this Policy on Minors in Laboratories.

### 2.0 DEFINITIONS

**Animals:** Any live animal used or intended for use in research, training, or teaching or for related purposes.

**Animal Facility:** Any area at Saint Louis University where research animals are housed, or where SLU researchers observe or perform any procedures on animals. (Reference: Policy Number AC-006.)

**Designated Supervisor:** A Saint Louis University employee who is directly responsible for overseeing the presence and involvement of the minor at Saint Louis University, and meets the following requirements:

- (a) The designated supervisor need not have an advanced degree but must be thoroughly familiar with the work in which the minor is involved at Saint Louis University.
- (b) The designated supervisor must be familiar with the Saint Louis University policy that governs the minor's involvement at Saint Louis University.
- (c) The designated supervisor must be current on all laboratory safety training relevant to all hazards present in the laboratory.
- (d) The designated supervisor must be at least 21 years of age.

**Institutional Animal Care and Use Committee (IACUC):** This committee reviews and approves protocols for the care and use of laboratory animals in research. The IACUC oversees the University's animal care and use program and

facilities. Research involving any live vertebrate animal requires the submission of an Animal Use Protocol (AUP) and subsequent approval by the IACUC. Approved AUPs must be amended to include minors and approved by the IACUC. Minors and (and any other visitors as applicable) must also comply with Policy AC-006, *Policy Regarding Visitors to Animal Facilities and Labs*.

**Institutional Biosafety Committee (IBC):** This committee is responsible for the safe conduct of biological research at Saint Louis University. Research involving any human, plant or animal pathogen requires the submission of an IBC application and approval by the IBC. Approved protocols must be amended to include the addition of minors to the protocol by submitting an amendment application.

**Laboratory:** Any Saint Louis University research laboratory, teaching laboratory, clinical laboratory, or animal activity areas (facilities, procedure rooms, and housing areas), including field study sites on or off campus. Includes any laboratory facilities or adjoining corridors for which card access is required to gain entry\*.

\* Example: Edward A. Doisy Research Center (DRC) and other laboratory facilities of similar layout.

**Minor:** Any individual under 18 years of age.

**Occupational Health Program (OHP):** A mandated program to prevent occupational injury or illness, and to ensure that all persons at the University who are potentially exposed to some level of risk because of their work in or near a laboratory have access to appropriate training, PPE, and medical surveillance if applicable.

**Personal Protective Equipment (PPE):** Personal Protective Equipment includes protective clothing and protective equipment required to be worn in the laboratory setting. The choice of proper PPE is risk specific. At a minimum, the participating minor must wear safety glasses or splash goggles and closed-toed shoes when in any laboratory, including for tours. (*See section 4.6.7 for additional details.*)

**STARS Program:** The Students and Teachers As Research Scientists Program (STARS Program) is a six-week educational program that pairs high school students and teachers with research mentors from Saint Louis University and some other local universities.

## 3.0 SCOPE

**3.1 Applicability to Saint Louis University Laboratories:** This policy is applicable to all Saint Louis University laboratories, as defined above.

**3.2 Applicability to Minors:** This policy is applicable to all minors, as defined above, unless exempted by the exceptions detailed in section 3.3. Applicability of this policy includes minors involved with instructional programs, shadowing, scout programs, tours, volunteering, and other educational outreach programs. This policy is also applicable to minors employed by Saint Louis

University and whose employment responsibilities are in Saint Louis University laboratories. Employment of such individuals must be processed through Human Resources and also be in compliance with any Saint Louis University Human Resources policies/procedures on employment of minors.

### **3.3 Exceptions:**

#### 3.3.1 Minors Enrolled at Saint Louis University

Minors enrolled at Saint Louis University who are participating in laboratory activities as part of their course work or undergraduate program requirements, or who are observing in laboratories as part of their course work are exempted from this policy. Each faculty member/researcher or designated supervisor is required to provide such student with appropriate safety instructions.

#### 3.3.2: Minors as Subjects in Research Studies

Minors who are subjects in research studies approved by a Saint Louis University Institutional Review Board are exempted from this policy.

#### 3.3.3 Minors in Saint Louis University Hospital Clinical Laboratories

Saint Louis University Hospital laboratories that serve clinical (not research related) purposes are under the purview of Saint Louis University Hospital (Tenet) policies.

#### 3.3.4 Minors in SLUCare Laboratories

Minors in non-research related SLUCare laboratories or clinical settings are under the purview of SLUCare policies.

## **4.0 POLICY & PROCEDURES**

4.1 Unless enrolled as a Saint Louis University student, minors are not allowed to conduct research or observe in Saint Louis University laboratories, except as specifically identified below.

4.2 All minors are prohibited from entering the following areas:

4.2.1 Any laboratory area designated as BSL-3, or ABSL-3, for recombinant or infectious organisms.

4.2.2 Any laboratory where select agents are used or stored.

4.2.3 Any laboratory where explosives which meet the federal requirements to be labeled as an explosive are used or stored.

4.2.4 Any laboratory or other area where there is potential exposure to radiation in excess of 0.1 rem (100 mrem or 1 mSv) total effective dose equivalent or in excess of 10% of the limits for general employees

specified by regulatory authority. Authorized Users of radioactive materials who plan to involve minors in activities in their laboratories shall also notify the Radiation Safety Officer prior to the minor beginning work in the laboratory.

4.2.5 Any area under construction or renovation.

4.3 All minors are prohibited from working with any of the following materials:

4.3.1 Acute Toxins

4.3.2 Select Agents

4.3.3 Radioactive materials

4.3.4 Machine produced ionizing radiation (x-rays)

4.3.4 Explosive Agents

4.3.5 Research Animals\*

\* Limited Exceptions Allowing Minors to Work with Research Animals:

A. SLU Student or STARS Participant: Unless the minor is enrolled as a Saint Louis University student, or a STARS participant, the minor is prohibited from visiting any animal facility, as defined in this policy and Research Policy AC-006, Policy Regarding Visitors to Animal Facilities and Labs.

B. Visits to any animal facility by an enrolled minor must comply with:

- (1) Saint Louis University Research Policy AC-006, including completion of the "Visitor Assumption of Risk and Release Agreement" contained in that policy, and must include consent of the parent or legal guardian. Approval by the Department of Comparative Medicine Chair is required prior to a minor visiting any animal facility.
- (2) All requirements of the Saint Louis University IACUC and IBC. These requirements must be met by the sponsoring faculty member/researcher and the minor, as applicable.
- (3) All other requirements of this Policy on Minors in Research Laboratories must be met, including training (See Section 4.6.5) and enrollment in the OHP (See Section 4.6.6).

- 4.4 Minors less than 14 years of age and not enrolled in high school (grades 9-12) are not allowed in Saint Louis University laboratories where there are physical hazards, where hazardous chemical, biological, or radiological agents are used or stored. An exception is allowed for Saint Louis University sponsored or approved educational/outreach programs which are designed for youth under the age of 14 but who are at least 10 years old and in the fourth grade, and which have documented training policies. Such programs include laboratory tours, science fair project mentoring, or scout programs that have been approved in advance by the Director of the Office of Environmental Health and Safety or his designee, in accordance with the provisions of this policy on minors in laboratories.
- 4.5 Any visiting minors under the age of 18 not previously approved by the Director of the Office of Environmental Health and Safety or his designee, as part of a Saint Louis University program, tour, science fair, or scout program are not allowed in any Saint Louis University laboratory (as defined in this policy) for any reason.
- 4.6 Minors, with the restrictions listed above, are allowed to visit, observe, or conduct research in laboratories if the following requirements are met in full:

4.6.1 Sponsoring Faculty Member/Researcher:

- A. Policy on Minors in Laboratories: This Saint Louis University policy, “Policy on Minors in Laboratories”, has been read by the Sponsoring Faculty Member/Researcher.
- B. Request for Approval Form: The “Request for Approval of Research Project Involving Minor Participants in Laboratories” form (Request for Approval Form) has been completed, including the “Faculty Member/Researcher Acknowledgement” section being signed by the sponsoring faculty member/researcher with responsibility for the activities in the laboratory. [Link to Request for Approval Form](#)
- C. Submission of Completed Request for Approval Form: Submission of the completed Request for Approval Form to the Office of Environmental Health and Safety must be made at least two weeks in advance of the participating minor(s) start date.
- D. Parent/Guardian Consent Form: The Sponsoring Faculty Member/Researcher has obtained all of the appropriate signatures on the “Parent/Guardian Consent for a Minor in Laboratories” form, and submitted a completed form for each minor participant to the Office of Environmental Health and Safety prior to the participating minor(s) start date. [Link to Consent Form](#)

- 4.6.2 Parent or Legal Guardian of Minor: The minor’s parent or legal guardian has read and signed a Saint Louis University Parent/Guardian Consent for Minor in Laboratories form.
- 4.6.3 Minor Participant: Each minor participant has read and signed the “Minor Participant Agreement” section included on the Parent/Guardian Consent form.
- 4.6.4 Approval by Director, Office of Environmental Health and Safety: The executed Request for Approval Form must be approved by the Director, Office of Environmental Health and Safety or his designee prior to the minor entering the laboratory. This includes receipt by the Director (or designee) of each properly executed Parent/Guardian Consent form prior to each visiting minor’s start date.
- 4.6.5 Training: The minor must have completed certain University provided training as well as hazard-specific training that is to be provided by the sponsoring faculty member/researcher. All training must be documented. Such training will include:
- A. For all laboratories:
    - (1) Training on specific safety-related practices and procedures as required for the laboratory, including evacuation procedures and the use of personal protective clothing or equipment (PPE) specific to the research or observation functions to be carried out by the minor.
    - (2) Laboratory Safety Training provided by the Office of Environmental Health and Safety.
  - B. For animal facilities (any laboratories involving the presence of laboratory animals):
    - (1) See section 4.3.5 for applicability.
    - (2) All minors conducting research on animals are required to attend the “Mandatory Animal Use and Occupational Health Orientation”, and any additional training required by the IACUC, and to be listed on an approved animal use protocol prior to handling animals, in accordance with the Saint Louis University Research Policy AC-008, Policy Regarding Training of Personnel Involved in Animal Research”.
- 4.6.6 OHP Enrollment for Extended Visits to Laboratories (longer than 4 hours, or involving multiple days or weeks): The minor must be enrolled in the Saint Louis University Occupational Health Program (OHP) and be provided full safety training for applicable exposure risk categories prior to beginning work involving the exposure risk category. The sponsoring faculty member/ researcher and the minor

must comply with all aspects of Research Policy RC-006, Occupational Health Program for Laboratory and Animal Research, including applicable medical surveillance.

- 4.6.7 **Personal Protective Equipment:** PPE specific to the hazard(s) must be provided by the sponsoring faculty member/researcher to the minor with instructions for proper use, cleaning and/or disposal as applicable. At a minimum, the participating minor must wear safety glasses or splash goggles, full-length trousers or skirt (all skin on legs covered) and closed-toed shoes when in any laboratory, including for tours. Laboratory coats are required to be worn by any minor participant observing or participating in research. Other PPE, specific to the risks involved in a particular laboratory, may be required to be worn by the minor for participation in research, including gloves specific to the risks involved, and a face shield. The sponsoring faculty member/researcher must follow the requirements outlined in the Saint Louis University Chemical Hygiene Plan, the Saint Louis University Pathogen Exposure Plan, and any approved protocols.
- 4.6.8 **Direct Supervision:** The minor must be directly supervised by the sponsoring faculty member/researcher or designated supervisor at all times while in the laboratory. Direct supervision must include line of sight and audible (normal speaking) voice range at all times, unless previously approved by the Director, Office of Environmental Health and Safety or his designee.
- 4.6.9 **Full Compliance:** The laboratory must be in full compliance with all applicable Saint Louis University safety programs and regulations.
- 4.7 **Additional Restrictions:** The sponsoring faculty member/researcher, laboratory manager, or designated supervisor may place additional restrictions on the presence of minors in their specific activity areas.
- 4.8 **Child-Sitting:** Minors who accompany a Saint Louis University employee to their Saint Louis University workplace for reasons other than participation in Saint Louis University research-related activities consistent with the scope of this policy are not permitted in Saint Louis University laboratories or animal facilities, as defined in Section 2.0 of this policy. (Refer to the definitions in Section 2.0 of this policy.) Admittance to other Saint Louis University areas is subject to approval by the appropriate dean, director, or department chair and any applicable Department of Human Resources policies and procedures.

## 5.0 IMPLEMENTATION AND AUTHORIZATION

- 5.1 The Vice President for Research is responsible for procedures to implement this policy.

- 5.2 The sponsoring faculty member/researcher is responsible for all activities in the laboratory or field site while the minor is present. Delegation of activities relative to the minor's presence to a designated supervisor does not eliminate the responsibility of the sponsoring faculty member/researcher.
- 5.3 Specific authorization on a case-by-case basis for a minor to be in situations as indicated in this policy is required from the Saint Louis University Office of Environmental Health and Safety. The Office of Environmental Health and Safety should be consulted if there are questions concerning whether or not a condition is present in a laboratory or facility that would come under this policy.
- 5.4 Exceptions to this policy must receive prior written approval from the Saint Louis University Vice President for Research or the appropriate designee.
- 5.5 Changes in this policy or any of its procedures, forms, or authority granted for approving minors in laboratories require approval by the Vice President for Research or the appropriate designee.
- 5.6 Changes in the sponsoring faculty member/researcher or the designated supervisor of the participant minor, changes in protocols, and changes to the participant minor's exposures to risks all require an amendment of the Parent/Guardian Consent for a Minor in Laboratories. Any such amendment requires reconsenting by the parent/guardian. An amended Request for Approval form, inclusive of the amended parent/guardian consents, must be submitted by the sponsoring faculty member/researcher to the Office of Environmental Health and Safety for approval by the Director, Office of Environmental Health and Safety, or his designee.

## **6.0 NON-COMPLIANCE AND SANCTIONS**

- 6.1 Non-compliance must be reported to the Saint Louis University Vice President for Research, the Office of Environmental Health and Safety, or if anonymity is desired, through the University's Anonymous Compliance Hotline: 877-525-5669.
- 6.2 Failure to comply with the conditions of this policy may result in the immediate removal of the minor(s) from the laboratory until corrective actions have been taken.
- 6.3 Gross or repeated violations of this policy by faculty, staff or other employees may result in disciplinary action. Disciplinary actions for non-compliance can result in suspension or termination of research by the University's Institutional Animal Care and Use Committee (IACUC), the Institutional Biosafety Committee (IBC), and/or a report of suspected misconduct, and/or reporting to government regulatory and/or funding agencies. Disciplinary action will be

guided by the University's Faculty Manual, Staff Handbook, or student guidelines.

## 7.0 REFERENCES

Code of Federal Regulations, Title 29, Part 570 (OSHA), *Child Labor Regulations*.

Code of Federal Regulations, Title 29, Part 1910.96 (OSHA), *Ionizing Radiation*.

Code of Federal Regulations, Title 10, Part 20 (NRC), *Standards for Protection Against Radiation*.

*Saint Louis University, Research Compliance, Policy Number AC-006, Policy Regarding Visitors to Animal Facilities and Labs, Version 2.0, November 6, 2012*

*Saint Louis University Research Compliance, Policy Number RC-006, Occupational Health Program for Laboratory and Animal Research, Version 1.0, December 5, 2011.*

*Saint Louis University Research Compliance, Policy Number AC-008, Policy Regarding Training of Personnel Involved in Animal Research, Version 1.0, July 15, 2014.*

*Saint Louis University Policy for the Protection of Minors, Version 1.0, January 17, 2013*

## POLICIES RESCINDED

Policy on Minors in Laboratories, Version Number 1.0, Effective Date: 23May2013

## APPROVAL SIGNATURES

### **This policy was approved by:**

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(Signed Copy on File) Date: 03/09/2015  
Raymond C. Tait, Ph.D.  
Vice President for Research Administration  
Saint Louis University

VERSION HISTORY		
EFFECTIVE DATE	VERSION NUMBER	MODIFICATION
23MAY2013	1.0	New Document
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