

University of Colorado Anschutz: Standard Operating Procedures (SOP) for Programs Involving Minors: (Program Name)

The (Program Name and Program Description)

1.1 Purpose

- **Objective:** Establish clear, consistent procedures to ensure the safety, well-being, and legal protection of all minors participating in CU Anschutz programs and activities.
- **Goals:** Provide program administrators and personnel guidance, maintain compliance with CU Anschutz and state policies, and ensure transparent communication with parent(s)/guardian(s).

1.2 Scope

- **Applicability:** This SOP applies to all programs and/or activities that include minor participants.
- **Participants:** Staff, faculty, volunteers, and others involved in delivering programs and/or activities.

1.3 Definitions

- **Minor:** Any individual who is under the age of 18.
- **Consent:** Informed, written permission provided by a parent/guardian for the minor's participation in the program and/or activity.
- **Waiver:** A legal document in which a parent/guardian acknowledges the inherent risks of a program or activity and agrees to release the University from liability for risks associated with the program and/or activity, to the extent permitted by law.

1.4 Roles and Responsibilities

- **Program Administrator:**
 - Must be a University Employee Faculty or Staff Member (no students, student workers)
 - Oversee the implementation of this SOP.
 - Ensure that all program staff and volunteers are adequately trained.
 - Conduct periodic reviews of processes, procedures, and guidelines.
 - Communicate with the Department or Section Head about the program.
 - Notify the Office of Educational Outreach and Pathway Initiatives of off-cycle changes to the program.
- **Program Personnel:**

- Always adhere to this SOP.
- Ensure all required documentation and training are completed and filed.
- Report any incidents or deviations from the established procedures to the Program Administrator.
- **Campus Administrator:**
 - Review and update legal documents.
 - Ensure ongoing compliance with local and federal laws regarding minors.

1.5 Procedures

1.5.1 Enrollment and Registration

- **Documentation:**
 - Collect completed consent forms and waivers from a parent(s)/guardian(s) before enrollment.
 - Verify the identity and age of the minor.
 - Statement of health for minors:
 - Known allergies and dietary needs.
 - List activities the minor may participate in throughout the program
 - Is the minor able to participate in these activities?
 - If the minor cannot participate, have the parent(s)/guardian(s) explain to provide accommodations.
- **Data Privacy and Record Keeping:**
 - Unless otherwise mandated by state or federal laws, the following records must be retained by the program administrators in accordance with University of Colorado APS 2006 Retention of University Records, <https://www.cu.edu/ope/aps/2006>.
 - Accident, incident, and injury records
 - Liability waivers, including but not limited to participant agreements, parent consent forms, photo/media release forms, consent for medical treatment
 - Employment records, including but not limited to time keeping, background check, and National Sex Offender Check
 - Volunteer records, including but not limited to time keeping, background check, and National Sex Offender Check
 - Training records of program staff, faculty, and volunteers with dates, content covered, and names.
 - All personal data of minors must be securely stored and in compliance with Policy 5013 File Storage Data Protection, <https://www.ucdenver.edu/docs/librariesprovider284/default-document->

[library/5000-information-technology/5013---file-storage-data-protection.pdf?sfvrsn=2fff3ba_2.](https://www.cu.edu/sites/default/files/RecordRetentionUCD.pdf)

- Personal data may only be shared with program personnel who have a specific need to administer the program and/or to ensure the safety and well-being of the minor.
- Follow established document retention and disposal guidelines in compliance with privacy laws, <https://www.cu.edu/sites/default/files/RecordRetentionUCD.pdf>.

1.5.2 Program Activities

- **Risk Assessment:**
 - **Risk Assessment and Emergency Planning Guide for Programs Involving Minors**
 - Evaluate each activity for age-appropriateness and potential hazards.
 - Implement safety measures to mitigate identified risks.
 - Provide parent(s)/guardian(s) and minor with the program's handbook.
- **Supervision:**
 - At a minimum, maintain staff-to-minor ratio per the American Camp Association, <https://www.acacamps.org/>. While industry ratio standards provide helpful guidance, appropriate supervision ratios should be determined by each department based on the nature of the activity, associated risks, and available staffing.

Program Participant Age Group	Number of residential (overnight) participants	Number of non-residential (day-only) participants	Number of Program Staff
5 Years*	5	6	1
6-8 Years	6	8	1
9-14 Years	8	10	1
15-18 Years	10	12	1

- Do not be alone with a minor; follow “Rule of 3” – minimize 1:1 contact with a participant. Always have another adult or minor present or remain in a public setting.
- Provide regular restroom breaks.
- Ensure constant supervision during all activities.
- **Parent(s)/Guardian(s)**
 - Consent to minor participation in program.
 - Acknowledge the minors' Code of Conduct for program participation. See Appendix A.

- **General Operating Guidelines**
 - Must have a daily sign-in and sign-out procedure.
 - Must have a procedure to ensure the location of all minors participating in programs.
 - Must have an attendance, absence, and cancellation policy.
 - If the minor is late or absent from the program, who will be notified and when.
 - Designate a meeting spot for all participants to start and end the day.
 - Designate a parking lot for participants driving themselves to use.

- **Lab Activity Guidelines**
 - Identify and describe the hazards, pathogens, and materials the minor will handle, and the procedures performed.
 - Consultation with EHS.

- **Transportation**
 - Programs must have a transportation plan.
 - If the program provides transportation, work with the Procurement Service Center, <https://www.cu.edu/psc/travel>, for approved vendors.
 - Participants driving themselves should be notified that there is a cost for parking and that their personal vehicle insurance will be their primary coverage in the event of a motor vehicle accident.
 - If the program/event does not provide transportation for participants to and from campus, all travel to the camp will be the responsibility of the participants or their parent(s)/guardian(s). The parent(s)/guardian(s) should coordinate with the child to determine what method of transportation will be best for them.

1.5.3 Emergency Procedures

- **Emergency Management and Preparedness**
 - Create an emergency communication plan with procedures to distribute the plan to program personnel and parent(s)/guardian(s).
 - A Campus Risk Assessment template is available for program administrators.

- **Emergency Contacts:**
 - Create and maintain up-to-date emergency contact information for each minor.
 - Name of Program Participant.
 - Name of Parent/Guardian #1, Parent/Guardian Phone Number and Email Address.

- Name of parent/guardian #2, Parent/Guardian Phone Number and Email Address.
- Name of Emergency Contact, Emergency Contact Phone Number, Email Address.
- **Emergency Protocols:**
 - Clearly outline steps to follow in case of an emergency.
 - Train staff in emergency response procedures and conduct regular drills.
 - **First Aid and CPR**
 - Program personnel who are eighteen (18) years of age and older should have current department approved First Aid and CPR certification for all ages of participants.
 - Program personnel may provide basic first aid for minor injuries or illnesses in accordance with their training and applicable University procedures. In the event of a serious injury, significant medical concern, or other emergency, staff must contact emergency medical services by calling 911 and follow established emergency response protocols. Parent(s)/guardian(s) will be notified via phone and email.
 - Program personnel may engage in basic first aid and CPR.
 - If a minor participant in the program carries an epinephrine auto-injector (EpiPen), a trained program staff member must always be in the immediate vicinity of the youth participants.
 - In case of a serious injury or emergency, program personnel will call the Anschutz Campus Police Department (303-724-4444) (if on the CU Anschutz campus) or 911 (if off the CU Anschutz Campus) for medical assistance, and parent(s)/guardian(s) will be notified as soon as possible via the emergency phone number on file.
 - UC Health Emergency Care - Anschutz Medical Campus
 - Address: 12505 E 16th Ave, FL 1, Aurora, CO 80045
 - Phone Number: 720-848-9111
 - Open 24 hours, 7 days a week
 - Children's Hospital Colorado- Anschutz Medical Campus
 - Address: 13123 East 16th Avenue, Aurora, CO 80045
 - Phone Number: (720) 777-6888
 - Open 24 hours, 7 days a week
 - **Medicine**
 - Program personnel cannot administer medication during the program, including over-the-counter medicines. All participants who need medication administered during the program, excluding

EpiPens, must self-administer or work with the ADA office to identify an accommodation plan.

- Program staff may engage in basic first aid and CPR.
- **Inclement Weather**
 - In case of inclement weather (extreme heat, extreme cold, rain, tornado, etc.) quality alternative indoor activities will be scheduled.
 - Alternate days, make-up sessions and refunds will not be made.

1.5.4 Incident Reporting

- **Immediate Action:**
 - Report any incident immediately to the program administrators.
 - Identify program personnel who qualify as a Mandatory Reporter per the state of Colorado, <https://oss.colorado.gov/mandatory-reporting>.
- **Documentation:**
 - Complete an incident report detailing the date, time, names, location, event, incident, actions taken, and outcomes.
 - File and review the incident report as part of continuous safety improvement.

1.5.5 Training and Supervision

- **Staff Training:**
 - All program personnel must complete annual Percipio Skillsoft CU: Child Protection – u00165, <https://universityofcolorado.percipio.com/linked-contents/41338e5a-6acd-405d-a2af-87b8fa43b82b/landing>
 - All program personnel must review APS 5014 – Sexual Misconduct, <https://www.cu.edu/ope/aps/5014>.
 - All program personnel must complete Percipio Skillsoft CU: Nondiscrimination, Sexual Misconduct and Reporting u00283 <https://universityofcolorado.percipio.com/liveCourse/5af7ba44-e08f-4672-85a7-4979b4e56da7>.
 - All program personnel must complete CU: FERPA for CU-SIS Access – u00049 <https://universityofcolorado.percipio.com/linked-contents/adde4258-0fce-44c6-89aa-0c4603bb9a9f/landing>
 - All program personnel must conduct regular training sessions on child safety, emergency response, and documentation.
 - All program staff and volunteers must review Policy 3001 - Child Protection Appendix A: Protocol for the Protection of Children Participating in Program for children on Campus: <https://www.cuanschutz.edu/docs/librariesprovider284/default-document->

- [library/3000-general-admission/3001---child-protection-policy.pdf?sfvrsn=3082f3ba_2](https://ucdenver.co1.qualtrics.com/jfe/form/SV_cvWDxzXaoAHGc1)
- Program administrators complete Notice of Program with Participation of Children Annual Attestation
 - Online:
https://ucdenver.co1.qualtrics.com/jfe/form/SV_cvWDxzXaoAHGc1
 - If a program participant discloses alleged misconduct to a CU employee who is a mandatory reporter, these individuals are required to inform the OERC.
<https://www.cu.edu/compliance/reporting>
 - Program administrators must review University Risk Management Guidelines and Check Lists, <http://www.cu.edu/risk>.
 - If applicable, program administrators must review Environmental Health and Safety minors in labs,
<https://research.cuanschutz.edu/ehs/home/divisions/research-safety-and-industrial-hygiene/minors-in-labs>.
 - If applicable, program administrators must review Policy 6006 - Minors in Laboratories and Animal Facilities,
https://www.ucdenver.edu/docs/librariesprovider284/default-document-library/6000-research/6006---minors-in-laboratories-and-animal-facilities.pdf?sfvrsn=1b6d67bb_4.
 - If applicable, program administrators must review Animal Research and Training with the Institutional Animal Care and Use Committee (IACUC) <https://research.cuanschutz.edu/committee-support/home/iacuc>, and the Office of Laboratory Animal Research (OLAR) <https://research.cuanschutz.edu/olar>.
 - Regularly evaluate program activities and staff performance to ensure adherence to this SOP.
 - Campus Assessment, Response, and Evaluation (CARE) Team training is available to evaluate safety risks to minors,
<https://www.cuanschutz.edu/student/support/care-team>.

1.6 Compliance and Review

- **Regular Audits:**
 - Conduct yearly program audits to ensure adherence to these procedures.
- **Review Schedule:**

- Review and update the SOP, Campus Risk Assessment, Transportation Plan, Emergency Communication Plan, and other programmatic documents annually, or after policy changes or program structure.
- **Program Monitoring and Review:**
 - Solicit feedback from program personnel, parent(s)/guardian(s), program participants, and campus administrator to improve safety and compliance.

2. Standardized Consent Form and Related Waivers

Use the following templates depending on the activity risk:

- **Participant Notice of Risk and Waiver** - Use for short-term, lower-hazard activities such as a campus tour.
- **Minor Consent** - use the Minor Consent template for all ongoing or long-term programs involving minors on campus in administrative or lower hazard areas.
- **Minor in Lab Consent** - use the Minor in Lab Consent for all on-going or long term programs involving minors on campus in labs or other higher hazard environments such as shops, construction or maintenance areas.

APPENDIX A

PARTICIPANT EXPECTATIONS & CONDUCT AGREEMENT

The following requirements must be read and agreed upon by the program participant and their parent(s)/guardian(s). During the time the Participant is in the care of CU Anschutz Programs or Events as part of the above-referenced program, the Participant agrees to:

- Commit to successfully complete the program.
- Adapt to and learn from the environment and comply with all rules.
- Be respectful of other participants and program staff.
- We require participants to participate in all events and activities. Exceptions may be made for religious reasons, certain events and ADA restrictions. We ask that you notify us in advance to request an exception.
- Meet with program staff when scheduled.
- Pay for any repairs or replacements of property damaged.
- Residential participants must be in their assigned rooms by 10:30 pm each night.
- Residential participants are not allowed to enter the rooms of other participants.
- Resident Assistants will perform room checks.
- Residential participants will always walk to and from the dorms with a Resident Assistant.
- Commuting participants must check in with program staff at each morning meeting.
- Participants who drive themselves will always walk to the parking lot at night with another commuting participant and with commuting staff members.
- Do not engage in sexual misconduct while enrolled in the program.
- Do not engage in foul or vulgar language.
- Do not infringe upon the rights of the others participating in the program.
- Participants are not to leave the scheduled activities on their own.
- When in transit, participants and program staff will travel as a group. This includes walking to meals, field trips, etc.
- Participants and parents/guardians should understand that CU Anschutz is an open urban tri-university campus environment and not a K-12 environment.
- Cell phones must be put away during classes, events, lectures, activities, and workshops unless they are being used to facilitate the assigned activity

APPENDIX B

VOLUNTEER & TRAINEE GUIDELINES

The University of Colorado's volunteers allow the university to broaden and enhance its services to the [campus](#) community. The purpose of these guidelines is to assist [campus](#) personnel in safely and effectively managing the risks and requirements of volunteer and trainee programs.

- Volunteer/Trainee supervisors are to familiarize themselves with, and utilize the [Volunteer and Training Guidelines](#) document and the URM [Volunteer Checklist](#) and [Trainee Checklist](#) along with applicable university campus policies and procedures related to the volunteer activity. Refer to the [Minor Guidelines](#) document to address additional consideration for minor participants.
- Contact Human Resources to assist in identifying screening requirements based on the activities and activity participants.
- Determine which trainings and waivers are required for the volunteers/trainees.
 - All volunteers must review Policy 3001 – [Child Protection Appendix A: Protocol for the Protection of Children Participating in Program for Children on Campus](#).
 - Mandatory training: Skillsoft – CU: Child Protection at UCCS, Clery Training, Emergency Action Plan
 - Safety training
 - HIPPA/FERPA
 - Other training(s)
 - [Volunteer Notice of Risk Waiver](#) should be collected for short term or incidental volunteer activity.
 - [Volunteer Agreement and Waiver](#) should be collected for all on-going or long-term volunteer programs described in the checklist and guidelines.
 - [The Trainee Agreement and Waiver](#) should be collected for all on-going or long-term trainee or intern programs as described in the checklist and guidelines.
- Establish written procedures to implement the volunteer and trainee guidelines and include:
 - Primary contact information
 - Expected number of volunteers/trainees. Note if they are faculty, staff, students, or unaffiliated.
 - What kind of interactions volunteers/trainees will have with minors.
 - The volunteers/trainees skills or qualifications.
 - Expected service hours/time commitment for volunteer/trainee activity.

- How direct supervision of volunteers/trainees will be ensured.
- Safety equipment requirements.
- Volunteer/trainee program orientation.
- How you will ensure that each volunteer/trainee completes their required training before the start of the program.
- Timeline to complete trainings.

APPENDIX C

INSURANCE

- Insurance is not required but is available for the department to purchase for the participants as needed.
- Insurance will cover injuries sustained as a result of activities the minor participates in while at the program or event; it is not health insurance and does not cover most illnesses or preexisting conditions.
- Payment for insurance is processed through the department's campus-issued speedtype.
- Application for insurance and additional information on the Camp Insurance program can be found on the [University Risk Management's website](#).
- Contact University Risk Management – 303-860-5680, riskmgmt@cu.edu.