



UNIFORMED SERVICES UNIVERSITY OF THE HEALTH SCIENCES

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October 13, 2022

SUBJECT: Protection of Minors Employed at the University

Instruction 6004

(EHS)

ABSTRACT

This Instruction prescribes the procedures to be followed for the protection of minors employed at the Uniformed Services University of the Health Sciences (USU).

A. Reissuance and Purposes. This Instruction reissues USU Instruction 6004 (*Reference (a)*), and established guidelines and procedures to protect minors from radiological, biological, chemical, and physical hazards.

B. References. *See Enclosure 1.*

C. Background. USU employs minors in paid or unpaid (volunteer) positions in USU laboratories. Minors are provided exposure to USU and its research programs while the faculty and staff are the recipients of their assistance. Because minors have special occupational protection requirements under Federal regulations: 10 CFR, Part 20 (*Reference (b)*) and 29 CFR, Part 570 (*Reference (c)*), and may be more susceptible to occupational hazards, USU has established guidelines and procedures in order to protect these individuals from radiological, biological, chemical, and physical hazards which may be found in the laboratory environment.

D. Definitions. *See Enclosure 2.*

E. Applicability. This Instruction applies to all USU personnel who provide oversight or supervision of minors, and to all participants in the Science and Engineering Apprenticeship Program (SEAP) or other Federally-sponsored programs.

F. Policy. It is USU policy that:

1. USU is required to comply with child labor regulations as outlined in 29 CFR, Part 570 (*Reference c*), which sets a 14 year minimum age standard for employees and volunteers. Special approvals for minors of age 14 or 15 to work at USU will be submitted to the Director of Civilian Human Resources (CHR). Requests for minors (ages 14 – 17) to work in areas with hazards will be submitted to the Department of Environmental Health and Occupational Safety (EHS) for evaluation and approval.

2. Special restrictions for minors ages 14 and 15 apply.

a. Cannot work more than three hours on any day or more than 18 hours in any week when school is in session.

b. Cannot work more than eight hours a day on any day or more than 40 hours in any week when school is not in session.

c. Cannot not work before 7:00 a.m. or after 7:00 p.m. (minors may work until 9:00 p.m. from June 1 to Labor Day)

d. Cannot work more than five consecutive hours without a non-working period of at least 30 minutes.

3. Under the USU Nuclear Regulatory Commission (NRC) License of Broad Scope (*Reference d*), the following restrictions apply:

a. Individuals under the age of 18 will not be allowed inside “posted” laboratories without the permission of the USU Radiation Safety Officer (RSO). NOTE: for the protection of any minor entering the USU campus, visits by school groups or children/guests of USU employees to USU “posted” laboratories must be approved by the RSO.

b. The handling of radioactive materials by minors is discouraged, but will normally be approved if the quantity of radioactive material handled is limited to activity levels listed in Schedule B of 10 CFR, Part 30.71 (*Reference e*)).

c. Minors are not allowed to work with any form or quantity of radioactive iodine.

4. Minors will only work under the direct supervision of a Principal Investigator (PI), Department Chair, Director, Branch Chief, or equivalent.

5. Minors working with blood borne pathogens and/or infectious agents:

a. Individuals under the age of 18 will not be allowed inside laboratories authorized for the use of blood borne pathogens and/or infectious agents without permission of the USU Biosafety Officer. NOTE: for the protection of any minor entering the USU campus, visits by school groups or children/guests of USU employees to USU laboratories authorized for use of blood borne pathogens and/or infectious agents must be approved by the USU Biosafety Officer.

b. The handling of blood borne pathogens and/or infectious agents by minors is discouraged. Approval to work with these biological hazards requires a review by the supervising PI and Biosafety Officer of the specific procedures to be performed.

6. Minors will be allowed to work with certain laboratory protocols in specific areas as approved and supervised by their mentor. Minors who work with animals must enroll in the Animal Exposure Surveillance Program and complete Department of Laboratory Animal


Resources (DLAR) – PI/Rodent Handling Training.

7. Minors are not authorized to handle human blood, body fluids or unfixed tissues.

8. Minors will not be allowed to work with Class III or IV lasers unless specifically approved by the USU Laser Safety Officer (LSO). Such work will not be approved unless it can be shown that the minor will be directly supervised by an experienced laser user at all times. Furthermore, written parental consent is required to clear the minor for such work. In the event that approval is granted, the minor will not be allowed to start work until an adequate ophthalmological exam is accomplished and detailed laser safety training has been provided by the LSO.

G. Procedures. *See Enclosure 3.*

H. Effective Date. This Instruction is effective immediately.



Jonathan Woodson, MD, MSS, FACS
President

Enclosures:

1. References
2. Definitions
3. Procedure

REFERENCES

- (a) USU Instruction 6004, "Minors Employed at the University," dated February 3, 2011 (hereby canceled).
- (b) 10 Code of Federal Regulation, Part 20, "Standards for Protection Against Radiation".
- (c) 29 Code of Federal Regulations, Part 570, "Child Labor Regulations, Orders and Statements of Interpretation".
- (d) USU Nuclear Regulatory Commission License of Broad Scope No. 19-23344-01.
- (e) 10 Code of Federal Regulations, Part 30, "Rules of General Applicability to Domestic Licensing of Byproduct Material".
- (f) USU Instruction 6002, "USU Occupational Health and Safety Program, Including Work Related Injuries or Illnesses and Medical Emergencies Involving University Employees," dated February 9, 2011, or as amended.
- (g) USU Instruction 6402-M, "Radiation Safety Guide," dated October 20, 2021.
- (h) USU Instruction 6407, "Implementation of Chemical Hygiene Plan," dated June 29, 2011, or as amended.

DEFINITIONS

1. Minor: An individual between the ages of 16 and 18, who is either a paid employee or volunteer assigned to USU under the supervision of a full-time USU employee (Mentor).
2. Posted: Refers to any laboratory in which radioactive materials are utilized under the USU Nuclear Regulatory Commission (NRC) License of Broad Scope.

PROCEDURES

1. Mentors who propose to oversee minors in any part of USU will submit a request to EHS on USU Form 6050 for approval no later than 20 workdays before the proposed work start date. The work start date for paid or unpaid employment will be established by the Civilian Human Resources (CHR).
2. Mentors will be aware of their responsibilities under USU Instructions 6002 (*Reference (f)*), 6402-M (*Reference (g)*), and 6407 (*Reference (h)*). Mentors will ensure their minors' complete all required training and sign in and check out of the USU through CHR. The following training is required and must be scheduled before EHS can sign off on the USU Form 6050 and forward it to CHR:
 - a. New Employee (One-Time – Online)
 - b. Environmental Awareness Training (One-Time - Online)
 - c. Regulated Medical Waste (One-Time - Online)
 - d. General Laboratory Safety (Every Two Years - Online)
 - e. Hazard Communication (Every Two Years - Online)
3. The training listed above and a review of the lab specific Chemical Hygiene Plan and Biosafety Manual (required) must be completed before work in laboratories can begin.
4. For Animal Work:
 - a. Complete DLAR Hands-On PI/Rodent Handling Training (Presented Monthly)
 - b. Enroll in the Animal Exposure Surveillance Program (AESP)
5. For Radioactive Materials/Radiation Use or work in a "Posted" Laboratory
 - a. Complete EHS Initial Radiation Safety Training (Presented Monthly)
 - b. Obtain written permission from the RSO for each minor (by email)
6. CHR has initial approval authority over all requests for minors to work at USU. A copy of the completed USU Form 6050 (received from EHS) will be returned to the PI for each approved or disapproved request. CHR will retain the original copy.
7. Mentors will monitor all work situations for minors in compliance with the guidelines of this Instruction and other applicable instructions or regulations.

8. CHR will notify mentors when minors report for duty at USU. CHR will direct minors to EHS for needed safety training. EHS will sign off on the CHR check-in-sheet when the training has been scheduled. Mentors will be responsible for ensuring that minors have completed all required training indicated on their USU Form 6050 prior to commencing work involving occupational hazards.

Attachment:
USU Form 6050 (Rev 4/01)

WORK ASSIGNMENT FOR A MINOR

Minor's Name: (Last) _____ (First) _____

Department: _____ Mentor's Name: _____

Lab Room Numbers Minor will be working in: _____

MENTOR, please indicate potential hazards that a minor could work with:

(NOTE: check all that apply)

☐ Chemical☐ Blood Borne Pathogens☐ Posted Radiological Lab☐ Lasers, List highest ANSI Class: _____☐ Animal Work☐ Infectious Agents☐ OTHER (List : _____)☐ NONE (e.g. Admin/Clerical)

1. Mentors are responsible for closely supervising assigned minors to ensure that all standard safety practices are observed in office and laboratory areas.
2. The minor is not authorized to handle human blood, body fluids or unfixed tissue.
3. If the minor plans to handle/use radioactive material or to work inside a posted radiological lab, then the Radiation Safety Officer's concurrence must be obtained prior to any work.
4. If the minor plans to work with animals, DLAR training and AESP enrollment is required.
5. The above-named minor has been scheduled for required training applicable to the minor's anticipated occupational exposures: EHS Staff: _____ Date: _____

Hazard Training	Required	Hazard Training	Required
New Employee	YES	Hands-On PI/Rodent Handling	Y / N
Environmental Awareness	YES	Enroll AESP	Y / N
Regulated Medical Waste	Y / N	Initial Radiation Safety	Y / N
General Laboratory Safety	Y / N	RSO's Written Authorization	Y / N
Hazard Communication	Y / N	Blood Borne Pathogen	Y / N

6. As a mentor, I fully understand that it is my sole responsibility to closely supervise the above-named minor to ensure that all standard safety practices, including the additional limitations listed above, are observed in office and laboratory areas and that work involving the above-stated occupational exposures will not occur until hazard specific training has been signature documented. I am also aware that I may be asked to produce this training documentation during routine EHS workspace inspections.

MENTOR signature: _____ Date: _____

**Please return this completed form to the Civilian Human Resources (CHR) Department.
Copy retained by mentor.**

Mentor = Principal Investigator, Department Chair, Director, Branch Chief, or equivalent

(USU Form 6050 – revised February 2022)