

DATE: June 27, 2003

TO: Deans, Graduate and Professional Schools
Department Chairs, Faculty of Arts and Sciences
Department Chairs, School of Medicine

FROM: Stephanie S. Spangler, M.D.
Deputy Provost for Biomedical and Health Affairs

RE: Minors in University Laboratories

As the summer approaches, I am writing to ask that you remind your faculty of the Yale University policy and procedures regarding the presence of minors in laboratories (copies attached). The University adopted this policy in order to meet obligations imposed by both state and federal regulations. The University's procedures are intended to assure compliance with the policy while optimizing students' laboratory experiences and minimizing disruption in the University's research activities.

Please note that this policy pertains to the presence of minors in all University-based research laboratory settings. While the participation of minors in field work falls outside the scope of this policy, investigators are responsible for the safety of minors in field work settings and are therefore encouraged to consult the Office of Environmental Health and Safety and my office if they have questions regarding the appropriate participation of minors in these University activities.

cc: Jon Clune
Penny Cook
Elan Gandsman
Andrew Hamilton
Susan Hockfield
Pierre Hohenberg
Suzanne Polmar
Sara Rockwell
Carolyn Slayman
Business Managers, School of Medicine
Chairs' Assistants and Business Managers, Faculty of Arts and Sciences

POLICY GOVERNING THE PRESENCE OF MINORS IN YALE UNIVERSITY
LABORATORIES

1. No person under the age of 16 may enter a Yale laboratory unless he/she is participating in an organized educational program sponsored by his/her school or municipality and approved by the Chair of the Yale FAS Department or the Dean of the Yale School where the program will take place; the Office of Environmental Health and Safety; and the Office of New Haven and State Affairs.
2. No person between the ages of 16 and 18 may enter a Yale laboratory except:
 - a. As part of a group or individual educational program approved in advance by the Chair of the FAS Department or the Dean of the School where the program will take place and the Office of Environmental Health and Safety.

OR

 - b. As part of a relationship in which a Yale faculty member or researcher is acting as a mentor to the young person, the young person will not be present in a Yale laboratory for more than five hours a week, and the young person's activities in the laboratory have been approved by the Office of Environmental Health and Safety.
3. All persons under the age of 18 who enter a Yale laboratory must complete all required safety training, must adhere to all restrictions imposed by the Office of Environmental Health and Safety, and must be supervised at all times.
4. Participants in the educational and mentoring programs described in 2a and b may not be paid according to an hourly, weekly, or monthly rate, but they may receive a lump-sum stipend approved, in advance, by the Department of Human Resources. Persons under the age of 16 may not receive any type of payment in connection with their presence in a Yale laboratory.
5. Yale faculty members sponsoring minors shall be responsible for obtaining all authorizations required under these rules.

April 30, 1999

PROCEDURES FOR IMPLEMENTING POLICY GOVERNING THE PRESENCE OF MINORS
IN YALE UNIVERSITY LABORATORIES

- 1. If an individual faculty member or the Chair of a School of Medicine Department wishes to bring a minor into his/her laboratory or department for an educational program as described in section 2a of the policy,** the faculty member should submit to the Chair of his/her Department (in the Faculty of Arts and Sciences), the Dean of his/her School (in schools other than Medicine), or the Director of the Office for Scientific Affairs (in the School of Medicine) a request that provides the name and age of the student and describes the educational intent of the proposed experience. The Chair/Dean/Director should review the request for educational appropriateness and forward a copy to the Office of the Deputy Provost for Biomedical and Health Affairs (Room 208, 1 Hillhouse Avenue) with a statement that the proposed activity represents an approved educational program of Department/School. This document should be copied to Jon Clune, Associate General Counsel, and Elan Gandsman, Director of the Office of Environmental Health and Safety. Upon receipt of the document, Mr. Gandsman will make sure that appropriate laboratory inspections are performed and that the faculty member is alerted to any measures that must be taken to assure the safety of minors in the laboratory.
- 2. If the Chair of an FAS Department or the Dean of a School wishes to bring a minor into his/her laboratory for an educational program as described in section 2a of the policy or wishes to implement a department- or school-wide program that includes educational opportunities for minors,** he/she should submit a request that provides the name(s) and age(s) of the student(s) and the educational intent of the proposed program to the Deputy Provost for Science and Technology. The Deputy Provost for Science and Technology will review these requests and forward them to the Deputy Provost for Biomedical and Health Affairs, copied to Jon Clune and Elan Gandsman, with a statement that the proposed activity represents an approved educational program.
- 3. If a faculty member, Chair, or Dean wishes to mentor a student under the age of 18 as described in section 2b of the policy,** he/she should follow the notification “pathways” outlined above but need include in his/her request only the name and age of the student and the commitment that the mentoring experience will require the student to be present in the laboratory no more than five hours per week. The Office of Environmental Health and Safety and the Associate General Counsel must receive copies of these requests as well as those for programs described in section 2a.