

POLICY GOVERNING MINORS IN YALE LABORATORIES

April 9, 2009

1. No person under the age of 16 may enter a Yale laboratory^{1,2} Students between the ages of 16 and 18 may enter a Yale laboratory as part of a Yale University approved educational program or individual educational mentorship with a faculty member. Applications must be reviewed and forwarded by the Chair of the FAS Department or the Dean (or designee) in self support schools to the cognizant provost (or designee) for approval
2. All proposed activities conducted by minors in University laboratories must adhere to any requirements or restrictions imposed by the Yale University Office of Environmental Health and Safety ("EHS"), the department or school (e.g. HIPAA training for School of Medicine activities), the cognizant provost, and where appropriate other bodies such as the IRB. In addition, all required training must be completed by the student prior to engaging in lab activities. The activities must be conducted under an appropriate supervisory plan developed by the faculty member and included in the application.
3. Signed [parental consent forms and liability waivers](#) are required for all participants under 18, and must be obtained prior to submitting the application. For ongoing recognized programs with competitive application processes, these forms may be obtained once the students who will participate have been selected. The sponsoring faculty member or Program Director must keep this form on file for at least two years.
4. Yale faculty members or Program Directors sponsoring minors shall be responsible for the following:
 - a. Electronically submitting the application, including certification that the parental consent form has been signed by the minor's parent/guardian and received by the sponsor;
 - b. Arranging for all stipulated training to be completed before the laboratory activity begins³;
 - c. Ensuring that the student is appropriately supervised at all times [by themselves or a qualified scientific supervisor], and,
 - d. Arranging the participant's Yale appointment through their department business office. Individuals approved for participation will be given an HR classification of Associate 4. A Yale net ID will be required in order for the student to take the appropriate training courses.
5. Certain activities in University laboratories are prohibited for all participants under the age of 18.
6. The purpose of the minor student's participation in laboratory activities at Yale is to provide the student with an introduction to an academic field of study and research and/or to offer the student an educational mentoring opportunity. The laboratory experience at Yale is solely for the benefit of the student. Accordingly, at no time will there be an employment relationship between the student and Yale, and the student may not receive any wages or other compensation for any of his or her educational activities at Yale. In limited circumstances, a participant may receive a lump-sum stipend if needed to enable his/her participation in the activity. This must be approved by the cognizant provost or designee as part of the application.

- ¹ For the purposes of this policy, “laboratory” refers to any part of a building used or intended to be used for scientific or technical activities which may be hazardous; this includes teaching laboratories as well as research laboratories.
- ² Exception for organized laboratory tours: Youths aged 12-17 may enter University laboratories for one-time educational or recruitment purposes. Tours must be conducted with permission of the faculty member responsible for the laboratory and the Department Chair or his/her designee. The faculty member will be responsible for proper supervision and for providing any appropriate personal protective equipment for the visitors. Tours must be supervised at all times while on the premises, and tour participants may not participate in any laboratory activities. Children under 12 years of age are prohibited from entering laboratory areas under all circumstances.
- ³ Note that non-laboratory (e.g. classroom/lecture) portions of an educational program may begin prior to the completion of EHS, IRB, HIPAA, IACUC or other stipulated training, but only after the approval is granted by the cognizant provost or her/his designee.

Application and approval procedure:

1. The faculty sponsor submits the completed application form (available at: http://www.yale.edu/provost/html/Minors_in_Labs_Application.docx) to his or her FAS department chair or self-support school dean (or designee), as applicable.
2. The department chair, dean or designee reviews the application, adds comments if necessary, then electronically forwards the application with their recommendation to the cognizant provost (or his/her designee) for that department/school for review and approval.
3. Approval by the cognizant provost (or designee) is given subject to the following:
 - a. Review of proposed activities by designated entities, such as EHS, IRB, IACUC, HIPAA, etc.;
 - b. Completion of all training/requirements stipulated in the reviews by these entities;
 - c. Understanding that the stipend (if any) is not for employment;
 - d. Understanding that all applicable aspects of this policy will be followed by any sponsoring organization/mentor, and the student
4. Approval by the cognizant provost or his/her designee, including any conditions, is sent to the faculty sponsor(s) via email, and copied to the following:
 - a. Entities that require review or training in advance of the activity
 - b. Office of New Haven and State Affairs
 - c. Program director for centralized programs, if applicable
 - d. Designated representative in the self-support school, if appropriate
 - e. Other unit(s) as might be applicable
5. Reviewing entities such as EHS, IRB, etc. contact the faculty sponsor following their reviews, providing information on all training and other restrictions/requirements to be addressed before the research activity begins. If the nature/scope of the student’s research changes, the faculty sponsor must notify the approving entities and ask them to revise the risk assessments.

Note: EHS reserves the right to inspect the laboratory in which the minor is participating in laboratory activities at any time while such activities are in progress, and all labs determined by EHS as conducting higher-risk activities will be inspected prior to the commencement of the minor's educational program. EHS has the authority to suspend the minor's laboratory activities if EHS finds any uncorrected safety deficiencies or other violations of stipulations made by EHS, the sponsor's department, or the cognizant provost. The IACUC, IRBs, and HIPAA offices likewise have the authority to oversee research in their areas of responsibility and to suspend activities when such action is appropriate.