

MINORS WORKING IN LABORATORIES

Background

Minors often seek and acquire opportunities to study or work at the California State University Long Beach (CSULB) and gain valuable knowledge and experience. We recognize both the importance of the educational and outreach missions of the university, and also the need to ensure a safe environment for all faculty, staff, students, and visitors.

Applicability

This policy applies to workers ages 16 and 17 years old who are Dean-appointed volunteers, matriculated CSULB students working as research assistants under faculty supervision, or paid. No-one under the age of 16 years may work on campus.

This policy does not apply to CSULB-enrolled minor students who may work in our college as part of their regular academic activities through class enrollment.

The presence of children, including children of CSULB employees and students is addressed in University policy, and are to never be left unsupervised in any office or other location on campus or to perform University work in the absence of a formal volunteer appointment.

The presence of children and minors who visit or tour college space is closely regulated by other written guidelines.

Work Locations

The Office of the Dean and the Science Safety Office maintains a list of college workplaces judged to be unduly hazardous for minors¹. Check to see if your rooms are on the list before moving forward with arrangements to have a minor to work under your supervision. If your workplace is not on the restricted list, follow the tenants of this policy presented below.

Application and Approval Procedure

Application and approval procedure for minors who wish to work in the laboratory:

1. The faculty sponsor submits the completed parental consent form (*Parental Consent for Minor Working in Research Laboratory*) to the Office of the Dean, College of Natural Sciences and Mathematics (CNSM). A letter from the faculty sponsor detailing the proposed activities must be provided as well. The original document is held in the Dean's Office; a copy is retained by the Science Safety Office. This process must be followed, even if the minor will be on the Foundation payroll.

2. The Dean or designee reviews the submittal, and may add conditions or restrictions. The Science Safety Office or campus EH&S may be consulted as appropriate. For approved minor volunteer appointments, a letter of appointment is sent both to the minor volunteer and to the legal guardian. For approved CSULB matriculated minor student workers, Dean-approved copies of the submitted documents will be sent to both the minor volunteer and to the legal guardian.
3. Approval of the appointment by the Science Safety Office is given subject to the following:
 - A final review of proposed activities by the Science Safety Office and the CNSM Dean's Office;
 - Successful completion of CNSM Introductory Safety Training;
 - Providing a completed Safety Program Form bearing the signatures of the volunteer and lab supervisor.
4. The Science Safety Office will contact the faculty sponsor to relay additional training and other restrictions/requirements to be addressed before the laboratory activity begins. If the nature/scope of the student's research changes, the faculty sponsor must notify the Science Safety Office and ask for a reappraisal of the risk assessments.

All proposed activities conducted by minors in CNSM laboratories must adhere to any requirements or restrictions imposed by the Science Safety Office, the CNSM Office of the Dean, and the Department Chair. In addition, all required training must be completed by the student prior to engaging in lab activities. The activities must be conducted under continuous direct supervision by a person who is fully trained in the tasks being performed. The Science Safety Office will meet with the sponsor in designated workplace before the minor begins work. The supervisor will describe the materials and methods to be used, and a safety inspection will be made.

Faculty Member Responsibility

CSULB faculty members sponsoring minors shall be responsible for the following:

- Adherence to this policy;
- Informing the minor's parent/guardian of the risks associated with the workplace. This task is accomplished by indicating the hazards on the *Safety Program Form*;
- Submitting the completed *Parental Consent for Minor Volunteer Assignments* to the CNSM Office of the Dean. The form must include signatures of the minor's legal guardian;
- Arranging for all required training to be completed **before** the specific laboratory activity begins;
- Providing hazard specific, documented, safety training with the minor as permitted hazardous operations are introduced into the workplace;
- Ensuring that the student is supervised at all times by an appropriately trained and qualified person, and that the minor never has access to a State key;
- Providing personal protective equipment, specific for any hazard, with instructions for proper use;
- Ensuring that the laboratory is in full compliance with all applicable CNSM and University safety policies and regulations, and that any safety inspection deficiencies have been adequately remediated. Unresolved inspection deficiencies will delay the approval of a minor to work in a given area;

- Activities involving the following specific hazards are prohibited in University laboratories for participants under the age of 18:
 - **Biological**
 - Human blood and other potentially infectious materials
 - Biohazardous materials of BSL2 or greater
 - Non-human primates, or animals presenting special hazards (bite, sting, zoonosis)
 - Select agents and toxins
 - **Chemical**
 - Carcinogenic materials
 - Known human reproductive toxins
 - High acute toxicity chemicals – these are listed on the [Science Safety Office](#) website
 - DEA-controlled substances
 - Pyrophoric and air/water reactive chemicals
 - Explosive or highly reactive chemicals (e.g., sodium, butyllithium)
 - **Radiation/Physical**
 - Ionizing radiation-generating equipment (XRD, X-ray, accelerator)
 - Radioactive materials
 - Unshielded lasers \geq class 3B
 - High magnetic field equipment (> 5 G)
 - **Other Equipment and Machinery**
 - High voltage equipment
 - Hazardous machinery (saws, wood or metal working, mixers, centrifuges etc.)

NOTE: If the educational plan proposed by the faculty member includes an activity that may technically fall under one of the above categories but poses an acceptably low risk to the minor, the sponsoring faculty member may request a special approval for the activity from the Science Safety Office. Non-participatory observation of these activities is allowed.

While not expressly prohibited from use, sponsors must be especially careful to monitor the handling by minors of:

- Organic solvents, especially halogenated solvents;
- Strong and/or oxidizing acids;
- Strong bases
- Toxic organics

¹It is understood that the hazard level of any workplace is subject to change. The Science Safety Office will update the list at least annually. On a case-by-case basis, it may be possible to change the status of a lab based on agreed-upon administrative controls.