



**RISK MANAGEMENT
& COMPLIANCE**

THE UNIVERSITY OF ALABAMA IN HUNTSVILLE

Guide for Youth Programs



**YOUTH PROTECTION
BEGINS WITH
YOU**

UAH.EDU/YOUTH-PROTECTION

[06.09.01 Youth Protection Policy](#)

youthprotection@uah.edu

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I. Program Registration Form

1. *Timely Submission of Youth Protection Policy Program Registration Form*

Program Contacts who are planning an Activity or Program for or that involves interaction with Youth, **regardless of care or custody**, must submit a registration form to the Office of Risk Management and Compliance (ORMC) for review and assessment of specific program requirements, no later than **eight (8) weeks prior to the start date of the program or activity**.

No Activity or Program for or that involves interaction with Youth shall be permitted to conduct operations involving Youth until the mandatory review has been completed and the program has been approved to proceed by ORMC.

Activities and Programs for or that involve interaction with Youth where Care and Custody of participants is maintained by individuals other than Parents/Guardians or Educational Guardians also have **additional** requirements which are detailed in the sections below.

2. *How to Register a Youth Program*

To register a Youth program, Program Contacts must complete the [Youth Protection Policy Program Registration Form](#). Additional resources can be found on the [Youth Protection Program website](#). Please contact youthprotection@uah.edu with any questions or concerns.

II. Program Staff

1. *Timely Submission of the Staff Information Form*

For Activities and Programs where Care and Custody will reside with Program Staff (individuals other than Parents/Guardians or Educational Guardians), the Program Contact must submit a fully completed Staff Information when completing the Youth Protection Policy Program Registration Form. The form is located on the [Youth Protection Program website](#).

2. *Staff-to-Participant Ratio*

Appropriate levels of access to and supervision of Youth are below. Regardless of the number of participants, at least 80% of the counselors must be age eighteen (18) or older. No individual under the age of sixteen (16) may serve as Program Staff in any capacity. Individuals aged 16 and 17 may serve in Support-Only roles, must work closely under the supervision of Authorized Staff, and cannot have Care and Custody of Youth.

At no time should a participant or group of participants be left alone or without the appropriate number of Program Staff. The following supervision ratios should be maintained **at all times** while the participants are in the care, control, or custody of Program Staff. This includes but is not limited to:

- Periods when participants are given "free" or "rest" time.

- Overnight when participants are housed in UAH residence halls or off-site housing without being accompanied by their Parents/Guardians. There should be sufficient staff on each floor to maintain the appropriate staff-to-participant ratio for the age of the participants.
- Travel to and from meals and activities.

Activities or Programs involving at least two (2) Youth, but fewer than five (5) Youth, should have a minimum of one (1) Authorized Staff responsible for oversight providing that no one-on-one interaction takes place. See the section on One-on-One Interactions below.

Activities or Programs including more than five (5) participants must provide additional oversight of Youth and meet the staff-to-participant ratios below. Residential Programs present a unique set of challenges that must be managed carefully. Additional supervision is required for overnight programs.

Youth Participant Age Range	Ratio of Program Staff (Day-Only Programs)	Ratio of Program Staff (Residential Programs)
5 years and younger	1 staff for every 6 participants plus one additional staff. *	1 staff for every 5 participants plus one additional staff. *
6-8 years	1 staff for every 8 participants plus one additional staff. *	1 staff for every 6 participants plus one additional staff. *
9-14 years	1 staff for every 10 participants plus one additional staff. *	1 staff for every 8 participants plus one additional staff. *
15-18 years	1 staff for every 12 participants plus one additional staff. *	1 staff for every 10 participants plus one additional staff. *

**See paragraph below for additional explanatory information*

All staff-to-participant ratios should conform to the above guidelines from the American Camps Association, plus one (1) additional Program Staff member, meaning that programs should maintain one (1) additional Program Staff over the number required by the above listed ratios. If the calculation results in a fractional number, always round up to the nearest whole number. If participants from multiple age groups are combined in a single group, the ratio for the youngest participant in the group should be applied.

Examples:

- A day camp of 10-year olds with 5 participants would require 2 Program Staff at all times. The 2 Program Staff must be Authorized Staff.
- A day camp of 10-year olds with 50 participants would require 6 Program Staff (A 1:10 ratio means a 5:50 staff-to-participant ratio applies. 5 Program Staff plus one additional Program Staff equals a total of 6 Program Staff). A minimum of 2 Program Staff must be Authorized Staff.

To ensure that the proper staff-to-participant ratios are fulfilled and maintained, it is the responsibility of the Program Contact to inform the ORMC of changes to the number of program participants, participant age ranges, and Program Staff no later than **one (1) week prior** to the start date of the program.

3. One-on-One Interactions

One-on-one interactions, *when appropriate to the program or activity*, may take place only in open, well-illuminated spaces or rooms observable and interruptible by other adults. Programs involving or that may potentially involve one-on-one interaction with Youth must submit a management plan to youthprotection@uah.edu detailing how the program will maintain these requirements. All one-on-one interactions with youth should be documented/logged, kept on file at the unit level, and made available upon request.

III. Background Checks

All Authorized Staff (individuals, paid or unpaid working in activities and programs for and involving Youth, and likely to have responsibility for the Care or Custody of Youth as part of that activity or program) must successfully complete annual background checks which must include criminal record checks, sex offender background checks, and social media checks. All background checks must be completed and cleared **no later than one (1) week before** the start date of the activity or program and **on an annual basis** for ongoing Activities and Programs.

Background checks must be completed **no more than twelve (12) months prior** to the scheduled start date of the program or activity. Individuals must have a federal, state, and municipality criminal background check. Individuals who have a break in service for fewer than twelve (12) months must disclose any convictions that occurred during the break within three (3) weeks (twenty-one (21) calendar days) prior to the beginning of participation in activities and programs.

Program Contacts may require background checks on broader categories for Authorized Staff. Background checks on applicable individuals may be performed more frequently if required by law. If a Program Staff member will be operating a motor vehicle as part of the Program activities, including but not limited to transporting children, a Motor Vehicle Record (MVR) check is also required and must meet the minimum requirements as shown in the [UAH Vehicle Safety Management Program Policy \(06.08.02\)](#).

Background checks must include a statewide criminal history search in the State of Alabama, and county-by-county or international criminal history searches for any location outside of Alabama in which the Program Staff member indicates they have lived, worked, or attended school within the past seven (7) years. The background check will be limited to criminal offenses for which an individual has been convicted, pled guilty or nolo contendere to a felony or misdemeanor, or where such charges are currently pending.

In addition to criminal records searches, a sex offender registry search and an ID Trace via the Program Staff member's social security number, which reports any locations in which the social security number has been used for credit purposes so that these locales can be checked if not disclosed.

Depending on the nature and severity of the offense, any criminal convictions and/or deferred adjudications could potentially disqualify a person from being employed by or assigned to an Activity or Program for or that involves interaction with Youth.

1. Background Checks for UAH Program Staff

Background check requirements apply to current UAH employees working as Authorized Staff who have not previously had a background check completed within the previous twelve (12) months, **regardless of original employment date**, and all other Authorized Staff. A current employee who is convicted of a crime (other than a minor traffic violation) shall be obligated to inform their supervisor in writing of that fact within five (5) business days after the conviction. See the University's [06.02.03 Employee Background Check Policy](#) for additional information for employee disclosure requirements.

Associated Costs

Activities and programs that:

- charge a participant registration fee may be responsible for the costs of background checks.
- are part of a Sponsored Programs activity or program, the budget submitted to the supporting agency must include the cost of the background checks required.
- do not charge a participant registration fee and are supported financially by UAH and/or gift funds provided through the UAH Foundation or provided directly to UAH through University Advancement will have the cost of the background checks covered through the ORMC.

2. Background Checks for Third-Party Program Staff

Third Parties may choose to either:

- a. Provide the ORMC with a notarized [Background Check Attestation Form](#) to certify that background checks have been conducted on all Authorized Staff (individuals working in Activities and Programs for or that involve interaction with Youth who are likely to have responsibility for the Care and Custody of Youth as part of that Activity or Program). Background checks must meet the University requirements provided in this Policy, and must have been completed within the 12 months prior to the start date of the program or on an annual basis for ongoing programs or activities; provided, however, that the ORMC may conduct quality assurance audits of background checks submitted by a Third Party, including, as necessary, performing additional background checks of Third-Party participants to verify the results. The background check attestation must be submitted **no later than one (1) week prior** to the start of the Activity or Program; or
- b. Request that UAH perform the background checks through the University's vendor/provider. The request must be in writing. The Third Party is responsible for the costs of the checks and must provide a billing address so that UAH can send an invoice. Costs of background checks are subject to change. Background check requests that are to be processed by UAH must be submitted no later than two (2) weeks prior to the start of the program or activity. All background checks must be completed and cleared **no later than one (1) week before** the start date of the Activity or Program and on an **annual basis** for ongoing Activities or

Programs. It is the responsibility of the Third Party to ensure that its Program Staff complete, in a timely manner, the steps necessary for UAH and/or its background check provider to process the background checks.

IV. Child Safety Training

Program Contacts must ensure that individuals working in Activities and Programs for or that involve interaction with Youth complete required training that examines concrete ways to recognize, prevent, and report situations of Abuse and Neglect, as well as any other training that may be required for specific Activities or Programs. All training must be completed **no later than one (1) week before** the start date of the Activity or Program. Links to the online training modules are found on the [Youth Protection Program website](#). Training completions will be verified by ORMC to ensure compliance.

Youth performing Activities or Programs in laboratories or around research animals may have additional documentation, training requirements, or restrictions imposed, depending on the specific nature of the hazards in the area. It is the responsibility of the Program Contact to coordinate all necessary laboratory/research safety training by contacting the [Office of Environmental Health and Safety \(OEHS\)](#).

V. Parent/Guardian Notifications (“Parent Packages”)

Activities and Programs for or that involve interaction with Youth must have in place, keep on file, make available on request, and enforce procedures that address the notification of the Youth’s Parent/Guardian in the case of an emergency, including medical emergencies, natural disasters, or other significant program disruptions; behavior expectations; and program rules. Participants and their Parents/Guardians must be advised of these procedures in writing prior to program participation.

1. Overnight Monitoring Plan

Parent Packages for Residential Programs (Programs that involve overnight stay in UAH housing facilities by Youth) must contain guidelines and policies that appropriately address the following:

- Identification to be worn by Program Staff;
- Curfews;
- Code of conduct for participants;
- Overnight monitoring plans;
- Prohibitions on the use of alcohol, tobacco, and non-prescribed drugs;
- Medical information and medication management programs (when applicable)

Program Staff should not enter participant rooms alone. If it is necessary to enter a room to check on a participant, two (2) Program Staff members should be present at all times.

Housing and Residence Life staff are responsible for building operations. They are NOT intended to serve as supervision for Youth participants.

VI. Waiver and Release from Liability (“Waiver”)

The Program Contact must collect, keep on file, and make available upon request, a waiver signed by a Parent/Guardian for each participant **and** for any individual under the age of 18 who may serve as Program Staff during the Activity or Program.

Programs may use the [Release and Indemnity Agreement](#) as a template.

UAH-Sponsored Programs should work with the UAH Office of Counsel to draft a program-specific waiver when appropriate.

1. Photography, Videography, and Other Online Content

Program Contacts must obtain verifiable parental consent prior to any collection, use, and/or disclosure of personal information. The Release and Indemnity Agreement template contains a clause pertaining to these services.

If the University will be providing photography and/or videography services, the Program Contact is responsible for contacting the [Office of Marketing and Communications \(OMC\)](#) to request these services.

The Program Contact must provide written assurance to OMC that verifiable consent from the Parent/Guardian has been obtained and kept on file for each Youth. UAH departments/units, including OMC will not post photos or videos featuring a Youth’s name, image, or likeness on UAH official webpages, University-affiliated webpages, University-affiliated social media accounts, or UAH official social media accounts without this assurance.

The Children’s Online Privacy Protection Act (“COPPA”) imposes certain requirements on operators of websites or online services directed to children under 13 years of age, and on operators of other websites or online services that have actual knowledge that they are collecting personal information online from a child under 13 years of age. Requests from Parents/Guardians to remove a photo or video featuring their Child’s name, image, or likeness from university-controlled media and/or web pages should be immediately forwarded to OMC for action.

Reference the [UAH 04.02.04 Office of Marketing and Communications Photography Policies](#) that outlines the proper use and access to photographic or video images produced by the OMC.

VII. Transportation Plan

The Program Contact must collect, keep on file, and make available upon request, details regarding the transportation of Youth at the beginning and end of the program, to and from the program, and within the program, whether by Parents/Guardians, Educational Guardians, Program Staff, or others. Transportation guidelines should outline any procedures required to be implemented to identify and manage who can or cannot pick up a participant at the close of a program.

Only UAH-Sponsored Programs may use UAH vehicles and UAH employees to transport participants, staff, or others. Programs that use University vehicles or drivers must comply with UAH policies regarding drivers and vehicles.

1. Program Attendance Records

An attendance record is required for each participant. The record should include the Youth's name, date and time of arrival/departure, and signature of the Parent/Guardian. In the event that a Youth is responsible for their own transportation, they may sign themselves in and out with date and time of arrival/departure. Program Staff should check identification of individuals before releasing Youth into their care.

VIII. Safety Planning and Incident Reporting

The Program Director and Program Contact must ensure that all Program Staff are aware of how to appropriately react to any of the following:

1. Incident Prevention

Program Staff must immediately report any safety concern or potential hazard to the Program Director and/or Program Contact so that such hazards may be addressed and remedied appropriately. This includes "near-miss" incidents where an incident did not result in injury, but where, given a slight shift in time or position, an injury easily could have occurred.

2. Reporting an Injury or Accident

Any accidents or injuries occurring during a program or activity for or including Youth should be reported to the ORMC according to established policies.

- Non-Employee injuries, including Youth and enrolled students, should be submitted using the [Non-Employee Accident Report](#)
- UAH Employees that sustain an injury from an accident arising out of and in the course of the performance of employment duties must submit an [Employee Occupational Accident Report Form](#)

Injuries to students at the UAH Early Learning Center (ELC) may be submitted to ORMC using the ELC's internal incident/accident report, provided such reports include all information required on the UAH Non-employee Accident Report.

Any emergent situations involving health or safety that are not addressed under these policies should be reported to UAHPD at 256-824-6911.

3. Reporting Other Incidents

Other Incidents and accidents can include such things as: injury "near misses;" behavioral issues among participants, counselors, or visitors; violent or potentially violent behavior; the possession or use of

alcohol or other drugs; inappropriate physical contact; or violations or potential violations of UAH policy.

Emergencies, including emergency medical situations, should be reported to UAHPD at 256-824-6911 or by dialing 911. Non-emergency incidents should also be reported to the UAHPD by calling 256-824-6596.

4. Emergency Response Plan

The Program Contact must keep on file, and make available upon request, a plan for weather emergencies and for communication and response to emergencies. These procedures should be documented and provided to all Program Staff. Emergency plans should be specific to the needs of Youth participants. See also the [UAH 06.08.03 Emergency Management Plan](#).

5. Food Allergy Accommodation Plan

The Program Contact should keep on file, and make available upon request, a process for soliciting and collecting information on food allergies. It is important to clearly communicate with any food vendors regarding food allergies and other special dietary needs. When there are participants with food allergies, Program Staff should be familiar with recognizing signs and symptoms of an allergic reaction and be prepared to implement emergency protocol.

6. Medication Management Plan

The Program Contact must collect, keep on file, and make available upon request, a plan for administering medication to a participant.

Parent/Guardian authorization is not required for administering a medication to a participant in a medical emergency to prevent the death or serious bodily injury of the participant, provided that the medication is administered as prescribed, directed, or intended. Examples include but are not limited to: epinephrine (e.g., EpiPens) or insulin.

If the Program Director chooses to administer medication in a non-emergency setting, including prescription and non-prescription medications, they must obtain consent from the participant's Parent/Guardian in a written, signed, and dated format. The participant's Parent/Guardian may not authorize administering medication in excess of the medication's label instructions or the directions of the Child's healthcare professional. Medication must be returned to the participant's Parent/Guardian, upon completion of the program, or upon participant dismissal from the program.

If the Program Director chooses not to administer non-emergency medication, Parents/Guardians must be notified prior to the participant's enrollment in the program.

Do not share Personal Health Information (PHI) with the ORMC. PHI should be safeguarded as required in federal legislation.

IX. Additional Requirements of UAH-Sponsored Activities and Programs

In addition to the requirements listed above, UAH units must follow the below policies:

1. [03.01.06 Use of Outdoor Areas of Campus](#)
2. [03.01.07 Use of Facilities](#)
3. [06.06.12 Motor Pool Policy](#)
4. [06.08.02 Vehicle Safety Management Program](#)
5. [06.08.10 Facility and Grounds Use Insurance Policy](#)

X. Additional Requirements for Third-Party Activities and Programs

In addition to the requirements listed above, Third-Parties must:

1. Establish a contractual relationship with the University department/unit and agree that the Third Party is an independent contractor using the facilities of UAH to conduct a program. This contract must be executed by all parties prior to advertising the program or accepting participant registrations.
2. Have a UAH point of contact who serves as the liaison (e.g. campus event schedulers) between UAH and the third-party personnel. The UAH point of contact must be a full-time UAH employee, and the UAH department/unit entering into the contract is responsible for communicating to the contracting party(ies) that the Third-Party Activities and Programs must be registered.
3. Provide evidence of insurance coverage in accordance with the [Insurance Requirements For Youth Programs Conducted By Third Party Entities](#).

XI. Conflicts of Interest and Conflicts of Commitment

University employees who have ownership of Third-Party Entities that operate activities or programs for or include Youth on the UAH campus should take steps to ensure that they are keeping their external business interests separate from their work at the University. In other words, UAH resources must be used for UAH business purposes and not for personal or Third-Party/LLC gain.

Additionally, all electronic media systems including voice mail, e-mail, the Internet, fax machines, hardware, software, local area networks, files, and all information composed, transmitted, accessed, received or stored in these systems are the property of UAH. These systems are to be used for conducting University business only and the use of this equipment for personal commercial purposes or for personal financial or other gain is strictly prohibited. See [06.09.05 Institutional Conflicts of Interest and Conflicts of Commitment](#) Policy.

XII. Mandatory Reporting Reminders

1. Mandatory Reporting of Child Abuse or Neglect

State law and University policy designate all University faculty, staff, students, volunteers, and representatives are mandatory reporters of Child Abuse and Neglect. University Policy requires Third-Party entities and their employees, representatives, or volunteers that contract for use of University facilities or partner with the University on Activities or Programs for or that involve interaction with Youth to carefully review and abide by the University's [06.09.04 Mandatory Reporting of Child Abuse and Neglect Policy](#). The Program Contact should review and understand the mandatory reporting procedures, and is responsible for disseminating the reporting procedures to all Program Staff and volunteers.

2. Clery Act Crime Reporting Requirements

The Jeanne Clery Campus Safety Act requires annual publication of statistics about reported campus-area criminal offenses, based on information gathered from local law enforcement and the University's Campus Security Authorities (CSAs). CSAs include an institution's campus police or security department; any individual with security responsibilities, like those monitoring access to campus property (such as parking lots, residence halls, and athletic venues); any individual or organization designated in an institution's security policy as those to whom students and employees should report crimes (include individuals that are not University employees, but may have a responsibility for campus activities); and officials with significant responsibility, authority, and duty to take action or respond to particular issues on the University's behalf.

Crimes must be reported to the UAH Police Department within two (2) business days for inclusion in the university's crime log. Crime log entries will not contain any personally identifiable information. Crime reports can be made by phone to UAH Police at 256-824-6596, submitting the CSA Crime Incident Report Form, or by visiting the UAH Police Department website. The Annual Security Report can be found on [UAHPD's website](#).

XIII. Resources

[Youth Protection Documentation Guide](#)
[Parent Package Template](#)
[Medication Administration Record Template](#)
[UAH Child Abuse or Neglect Report Form](#)
[CSA Crime Incident Report Form](#)
[Injury and Reporting Forms](#)
[UAlert](#)
[UAH Emergency Management Plan](#)
[Campus Safety and Security Information](#)
[Alabama Sex Offender Database](#)
[National Sex Offender Database](#)