

**THE UNIVERSITY OF ALABAMA IN HUNTSVILLE**  
**YOUTH PROTECTION POLICY**

**Number** 06.09.01

**Division** Administration – Office of Risk Management and Compliance

**Date** December 11, 2012; Reviewed and revised August 1, 2018; February 16, 2025

**Purpose** The University of Alabama in Huntsville ("UAH" or "University") is committed to maintaining a supportive, welcoming, and safe educational environment that seeks to enhance the well-being of all members of its community. This commitment reflects the institution's adherence to its mission, to its various policies supporting its mission, and to relevant state and federal laws. Within that commitment, UAH places importance on creating a secure environment for Youth and has adopted the following Youth Protection Policy.

All UAH faculty, staff, students, volunteers, and representatives, as well as Third-Party Entities and their employees, representatives, or volunteers who use UAH facilities or resources, and who have responsibilities that involve interaction with Youth must carefully review and abide by this Policy.

Code of Alabama Title 26, Chapter 14, Section 14 ("Reporting of Child Abuse or Neglect") and Board Rule 106.2 of The Board of Trustees of the University of Alabama provide the authorities for this Policy.

**Policy** Parents/Guardians should not leave Youth unsupervised on University property. UAH expects Parents/Guardians to provide supervision for Youth (individuals under the age of 18) who are on campus unless the Youth is engaged in an activity or program for or that involves interaction with Youth where Parents/Guardians or Educational Guardians (defined below) are not expected to maintain Care and Custody.

**Any** event, operation, or activity operated, conducted, or organized by any unit or organization that is for or that involve interaction with Youth as participants are within the scope of this Policy, and **must be registered** with the Office of Risk Management and Compliance (ORMC). Examples of Activities and Programs that fall under the scope of this policy include but are not limited to:

- Activities or Programs that the University operates on campus or off campus in University-owned or leased facilities, including, but not limited to, overnight camps, instructional programs, day camps, academic camps, sports camps, day cares, preschools, and research (sponsored or otherwise).
- Activities or Programs that are operated, conducted, or organized by Third Parties that take place on campus or off campus in University owned or leased facilities, including, but not limited to, facility rental and/or grounds use agreements with Third Parties or organizations.

- Activities or Programs that the University operates, conducts, or organizes that do not take place on campus, including, but not limited to, virtual programs and community service or outreach activities.
- Faculty or staff who bring Youth to campus as interns or volunteers outside of a structured activity or program. This could also include auditions, lessons, tutoring, or tours where the Parent or Guardian is not present.
- Student organizations or any other University affiliated organization operating, facilitating, or sponsoring Activities or Programs for or that involve interaction with Youth. This includes recruiting events.
- Operations of licensed Childcare facilities or programs operating on the UAH campus, operations of Childcare facilities – regardless of licensure status – operating within UAH colleges, departments and/or operational units, and all other Child educational programs operating on the UAH campus are covered under this policy. These facilities or programs are expected to comply with all applicable laws and regulations in addition to this Policy. In addition, separate camps, programs, or activities sponsored by these facilities are subject to this policy.

Registration for ongoing and preestablished Activities or Programs for or that involve youth must be completed annually prior to the beginning of the University academic year.

This Policy *generally* does not apply to:

- Undergraduate and graduate academic programs in which individuals under the age of 18 are enrolled for academic credit during the semester in which the program is held.
- Events on campus open to the general public that Youth also attend (e.g., official sporting events, UAH theatre performances, etc.).
- Official University admissions events **where Youth are expected to be accompanied by a Parent/Guardian.**
- Medical care given to Youth in UAH patient-care settings.
- Youth employed by the University in any capacity.

These areas/programs are still subject to all other relevant UAH policies and procedures.

For programs where Parents/Guardians or Educational Guardians will have Care and Custody of Youth participants, the program may not be subject to *certain requirements* under the Youth Protection Policy (such as required training and background checks for Program Staff). However, state law and University policy designate all University faculty, staff, students, volunteers, and representatives are mandatory reporters of Child Abuse and Neglect. See the section below titled “Mandatory Reporting of Child Abuse or Neglect.”

### **Compliance and Accountability**

Any inappropriate behavior or contact between Program Staff and program participants that violates approved program activities, established law, or UAH policies is prohibited.

Known or suspected violations of laws will be reported immediately to the appropriate law enforcement authorities/agencies.

Activities or Programs for or that involve interaction with Youth may not occur without appropriate UAH approval as outlined herein. Activities or Programs are subject to site visits coordinated by the ORMC to promote compliance. Any suspected violation will be subject to investigation by the appropriate University officials. Colleges, units, and individuals must cooperate with investigations when they occur.

Compliance with this Policy and Guidebook found on the [Youth Protection Program website](#) is required as a condition of operating Activities or Programs for or that involve interaction with Youth at UAH. Failure to comply with the requirements can result in the loss of program privileges and other sanctions at UAH.

Individuals violating this UAH policy will be held accountable for their actions, which may include, but are not limited to:

- Volunteers are subject to reprimand or loss of volunteer status;
- Students are subject to the Code of Student Conduct;
- Faculty, staff, and student employees are subject to corrective action up to and including termination;
- Unit level sanctions including but not limited to loss of youth program hosting and participation privileges, and other sanctions as deemed appropriate by institutional leadership; and
- Third Parties are subject to punitive actions under the terms of their contract agreement, up to and including termination of contract.

UAH, through its ORMC, retains the right to modify or make exceptions to the accompanying procedures at any time based on business need. This procedure is not intended to be a set of inflexible requirements.

## **Definitions**

Abuse - Harm or threatened harm to a Child's health or welfare. Harm or threatened harm to a Child's health or welfare can occur through nonaccidental physical or mental injury, sexual abuse or attempted sexual abuse, or sexual exploitation or attempted sexual exploitation.

Activities or Programs for or that involve interaction with Youth ("Activities" or "Programs")

- Any event, operation, or activity operated, conducted, or organized by any unit or organization that is

1. supported by or affiliated with the University (including off-campus and virtual programs);
2. occurring on University property;
3. that includes Children Youth as participants, regardless of Care or Custody.

Authorized Staff - Individuals over the age of 18 who have been authorized by the University to have Care and Custody of Youth in the absence of a Parent/Guardian or Educational Guardian.

Child, Children, or Youth (terms used interchangeably herein) – For purposes of this policy, any individual(s) under the age of 18.

Care and Custody - When a person is (1) directly responsible for Youth, (2) has authority over Youth, and/or (3) handles the disciplinary measures of Youth in the absence of a Parent/Guardian or Educational Guardian.

Educational Guardian - An adult individual, such as a teacher, coach, or other appointed chaperone, who is duly authorized by a public K-12 institution located in the state of Alabama and/or Alabama High School Athletic Association (AHSAA) member institutions to act as their representative, and who has the authority and duty to care for the Youth during the program or activity. (An example would be an adult teacher or coach accompanying Children from a public K-12 school on an authorized field trip to the UAH campus.)

Neglect - Negligent treatment or maltreatment of a Child, including the failure to provide adequate food, medical treatment, supervision, clothing, or shelter.

Parent/Guardian - A biological or adoptive parent, legal guardian, or custodian with legal authority to make decisions on behalf of the Child.

Program Contact - The individual who represents the department, college, student organization, or Third Party responsible for the registration, direction, or operation of the Activities or Programs. The Program Contact is responsible for ensuring that all requirements have been met and must maintain regular communication with ORMC.

Program Director - The individual on-site who is responsible for the day-to-day operations of the activity or program and who oversees Program Staff.

Program Staff - Paid and unpaid individuals who have direct contact with program participants under the age of 18, and who are responsible for planning, teaching, coordinating, and/or carrying out the activity or program.

Residential Program – A program where Youth will be staying overnight in UAH owned or leased residential halls as part of the activity or program. These programs require additional oversight and overnight monitoring plans.

Support-Only Staff - Program Staff who provide assistance to Authorized Staff. Support-Only Staff must work under the close supervision of Authorized Staff in order to participate in an Activity or Program for or that involves interaction with Youth. Support-Only Staff must be age 16 or older and cannot have Care and Custody of program participants.

Third Party(ies) - An individual or entity that is not a UAH academic, research, administrative, or other operational unit (e.g., community groups, non-profit organizations,

and limited liability companies) that contract with UAH or otherwise make arrangements for use of University facilities or resources.

Third-Party Activities and Programs - Activities and Programs for or that involve interaction with Youth that are not controlled or operated by UAH, where UAH employees/volunteers may or may not be involved in their “official” employment capacity. These Activities and Programs are offered by an individual or entity that is not a UAH academic, research, administrative, or other operational unit (e.g., community groups, non-profit organizations, and limited liability companies) who contract with UAH for use of University facilities or resources. These programs complete all or part of their business purpose on UAH property, and the Third-Party individual or entity assumes full responsibility for the supervision of the participants. Third-Party Activities and Programs may collect fees from participants.

UAH-Sponsored Activities and Programs - Activities and Programs that are approved by UAH administrators, operated solely by the institution in its own name, registered by UAH unit or entity, and supported financially, in whole or in part, by UAH. Such programs must have a Program Contact who is a UAH employee identified as a central contact for Program information who maintains responsibility for the program throughout the registration process, during the program activities, and until the program has ended. UAH-Sponsored Activities and Programs may involve contracting with Third-Party Entities who provide program goods and services. The objectives of such programs should reflect the academic, research, or recreational goals of the UAH Program Contact’s department or program. UAH Sponsored Activities and Programs may collect fees from participants.

## **REQUIREMENTS FOR ALL ACTIVITIES AND PROGRAMS FOR OR THAT INVOLVE INTERACTION WITH YOUTH**

### **Timely Submission of Youth Protection Program Registration Form**

Program Contacts who are planning an Activity or Program that is for or involves interaction with Youth, regardless of Care and Custody, must submit a registration form to the ORMC for review and assessment of specific program requirements, no later than **eight (8) weeks prior to the start date of the activity or program**. No Program or Activity for or that involves interaction with Youth shall be permitted to conduct operations for or involving Youth until this mandatory review has been completed and the program has been approved to proceed by ORMC. Review and assessment requests should be submitted by emailing [youthprotection@uah.edu](mailto:youthprotection@uah.edu). The form is located on the [Youth Protection Program website](#).

### **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

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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.

### **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 [UAH's website](#).

### **ACTIVITIES AND PROGRAMS FOR OR INVOLVE INTERACTION WITH YOUTH WHERE CARE AND CUSTODY OF PARTICIPANTS IS MAINTAINED BY INDIVIDUALS OTHER THAN PARENTS/GUARDIANS OR EDUCATIONAL GUARDIANS HAVE ADDITIONAL REQUIREMENTS BELOW.**

#### **1. Timely Submission of Staff Information Form**

For programs where Care and Custody will reside with Program Staff other than the Parent/Guardian or Educational Guardian, the Program Contact must submit a fully completed Staff Information Form as soon as possible. The form is located on the [Youth Protection Program website](#).

#### **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 involving 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.

<b>Youth Participant Age Range</b>	<b>Ratio of Program Staff (Day-Only Programs)</b>	<b>Ratio of Program Staff (Residential Programs)</b>
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.

### 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. Activities or Programs involving or that may potentially involve one-on-one interaction with Youth must submit a management plan to the ORMC detailing how the program will maintain these requirements.

## **2. Background Checks**

All Authorized Staff (individuals, paid or unpaid working in Activities and Programs for and that involve interaction with Youth, and likely to have responsibility for the Care and 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 or 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 Youth, 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.

#### 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.

#### Background Checks for Third Party Program Staff

See the section "Additional Requirements for Third-Party Activities or Programs."

### **3. Mandatory 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).

#### **4. 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.

##### Overnight Monitoring Plan

Parent/Guardian communication packages for 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.

#### **5. 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.

### 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 Rule ("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 Photography Policy that outlines the proper use and access to photographic or video images produced by the OMC.

## **6. 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.

## 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.

## **7. 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:

### 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.

### Reporting an Injury or Accident

Any accidents or injuries occurring during an Activity or Program for or that involves interaction with Youth should be reported to the ORMC according to established policies.

- Any UAH employee that sustains an injury arising out of and in the course of the performance of employment duties (also known as an On-the-Job Injury) must submit an [Employee Occupational Accident Report Form](#)
- Students and non-employee injuries should be reported using the [Non-Employee Accident Report](#)

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 issues that are not addressed under these policies should be reported to UAHPD at 256-824-6956.

### Reporting Other Incidents

Incidents and accidents can include such things as: injury "near misses," minor to major physical injuries of participants and/or counselors; behavioral issues among participants, counselors, or visitors; hospital/doctor visits; 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.

#### 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](#).

#### 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.

#### 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 Youth'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.

## **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](#).

### **Background Checks for Third Party Activities and Programs**

Third Parties may choose to either:

- a. Provide the ORMC with a notarized background check attestation 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 a 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 Activities or Programs; 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 program or activity; 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.

## Conflicts of Interest or Commitment

University employees who have ownership of Third-Party Entities that operate Activities or Programs for or that involve interaction with 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.

## Third Party Advertising

Third-Parties may not promote the activity or program as a UAH-Sponsored program/activity. Third-Parties must not hold themselves out to be or give the appearance of being an agent, servant, or employee of UAH. No registered symbol, mark, or logo can be reproduced by any non-UAH entity as per the UAH 08.01.02 Logo Use Policy. The UAH Chargers logo is only to be used when advertising official UAH Athletics Activities or Programs. Any other use of the Chargers logo or any of its elements must first be approved by UAH Athletics and must also be approved by OMC. The logo cannot be modified or redesigned.

The following statement should be included in all program-related brochures, websites, advertising materials, etc.:

“(Activity or Program Name) is solely operated by (Legal Name of Entity), which is not affiliated with The Board of Trustees of The University of Alabama or The University of Alabama in Huntsville.”

**Review**        The Office of Risk Management and Compliance is responsible for the review of this policy every five years (or whenever circumstances require).