

# OPERATIONAL REQUIREMENTS FOR CONDUCTING UNIVERSITY YOUTH PROGRAMS

Revisions Effective January 1, 2023

## I. Background.

The University strives to offer a safe and enjoyable educational environment for all minors attending its programs. In support of that goal, this document sets forth minimum requirements for conducting University youth programs.

## II. Applicability.

These requirements apply to all University youth programs, except programs that are covered by other youth program policies. MSU Extension (including 4H) has documented policies and practices that align with this policy through the MSU Extension Volunteer Selection Process and the 4-H Program Planning and Management Reference Guide. For questions on MSU Extension youth programming policies, please contact the Children and Youth Institute's Policy and Risk Management Extension Educator.

### **Policy and Risk Management Extension Educator**

Dorothy Munn

Children and Youth Institute

MSU Extension

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## III. Consequences.

Programs that fail to comply with University-wide requirements for facilitating youth programs may be subject to suspension or termination of operations. Relevant unit administrators (e.g., Deans, Directors, Chairpersons, Human Resources representatives, Employee Relations representatives, etc.) will be notified of policy violations, and University employees who violate the policy may be subject to disciplinary action, up to and including dismissal. Discipline for violations of this policy will be handled in accordance with applicable employee disciplinary policies and procedures.

## IV. Definitions.

**A. Minor:** A person under the age of eighteen who is not enrolled or accepted for enrollment at the University. Students who are "dually enrolled" in University programs while also enrolled in elementary, middle, or high school are not included in this policy unless such enrollment includes a residential component in University housing.

**B. Youth Athlete:** An individual who participates in an athletic activity and who is under 18 years of age.

**C. Youth Athletic Activity:** A program or event, including practices and competition, during which youth athletes participate or practice to participate in an organized athletic game or competition against another team, club, entity, or individual.

**D. Youth Program:** Any class, camp, program, or other learning activity that includes participation by minors. The term "youth program" does not include (1) private, personal events (e.g., birthday parties, weddings) that occur at University facilities, or (2) events open to the general public (e.g., intercollegiate athletic events, concerts, Wharton Center events).

**E. One-on-one Contact:** Unsupervised interaction between a minor and any adult who is not the minor's parent or legal guardian. One-on-one contact limitations do not include situations in which more than one minor or staff/volunteer is present.

## **V. Criminal Background Checks**

### **A. Requirements**

1. MSU youth programs: All adult employees and volunteers working with minors at a youth program must have been subject to a criminal background check (including sex offender registry check) through the Human Resources Department within the last twelve months.
2. Contractors working with minors at a youth program must have been subject to a criminal background check (including sex offender registry check) through the University purchasing process and procedures within the last twelve months, in compliance with Exhibit 1 of [Section 270 of the Manual of Business Procedures](#).
3. All adult employees and volunteers with access to minors' residential housing during a youth program must have been subject to a criminal background check (including sex offender registry check) through the Human Resources Department within the last twelve months.
4. External youth programs operating at MSU: See item VI. J. 3. for guidance regarding background check requirements.

### **B. Youth Program Criminal Background Check Timelines**

1. When requesting youth program Criminal Background Checks for adult staff or volunteers working with minors in a youth program, submit the appropriate [forms](#) to MSU Human Resources in accordance with the following guidelines:
  - i. At least 5 business days for under 50 total staff and volunteers; and
  - ii. At least 10 business days for 50 or more total staff and volunteers.
  - iii. If a program fails to request criminal background checks in accordance with these timelines, Criminal Background Checks may not be completed in time for the anticipated start date for either the program or the staff or volunteers. In such instances, the program and/or the staff or volunteer start date may need to be postponed, pending the completion of the criminal background check process.

### **C. Self-disclosure Processes for MSU Faculty, Academic Staff, and Executive Management**

Faculty, academic staff, and executive management involved with University youth programs must comply with the applicable policies and procedures regarding self-disclosure processes outlined in the Faculty Handbook regarding Criminal Background Checks for Faculty, Academic Staff and Executive Management.<sup>[ 7]</sup>

### **D. Exceptions to Criminal Background Check Requirements**

1. The criminal background check requirements **do not** apply to youth programs whose format requires the participating minor to be accompanied at all times by a parent, legal guardian, or other adult relative (e.g., Grandparents University, Take your Child to Work Day).
2. MSU students hosting siblings or other family members during campus events (e.g., sibling weekend) are not required to have a criminal background check.
3. External organizations using MSU facilities open to the general public are not required to provide certification of criminal background checks, even if minors are present. Managers of MSU facilities open to the general public are advised to implement space use agreements that include site-specific policies regarding background check clearances for external youth-serving groups using their spaces, the types of services available to walk-in guests, and the types of services that require advance notice.

#### **E. Criminal Background Check and Sex Offender Registry Results**

The following types of convictions will normally render an individual ineligible to work or volunteer at a University youth program:

1. Drug distribution activity or felony drug possession
2. Sexual offenses
3. Crimes of violence involving physical injury to another person
4. Child abuse, molestation or other crimes involving child endangerment
5. Murder
6. Kidnapping
7. Any other felony or crime involving moral turpitude

Individuals who have access to minors at a youth program may generally not be listed on any sex offender registry.<sup>[ 13]</sup>

Individuals who do not have satisfactory criminal background check results will be provided with an opportunity to explain the results and give clarifying information to Human Resources before a final decision regarding eligibility is made.

#### **VI. Operational Requirements.**

**A. Program Registration.** MSU youth program leaders must register all programs and sessions/activities in the [Youth Safety Portal](#). Youth program leaders must respond to questions regarding general program details, their supervision ratios for the program, programming locations, program staff, and the program's compliance with the operational requirements for conducting university youth programs. Youth program leaders are also asked to upload their program forms and materials.

1. Youth program directors/coordinators must register each youth program in the MSU Youth Safety Portal at least 60 days prior to the start of the program.
2. Youth program directors/coordinators must register each session/activity within a program in the Youth Safety Portal at least three weeks prior to the start of the session/activity.

3. After a program is registered in the Youth Safety Portal, the Youth Programs: Registration, Safety Assurance, and Education Program will review all program details and will provide feedback to the youth program directors/coordinators.
4. Youth program directors/coordinators must implement all necessary changes communicated from the Youth Programs: Registration, Safety Assurance, and Education Program prior to the program's start date.
5. Should youth program directors/coordinators fail to register a program by the registration deadline, the Youth Programs: Registration, Safety Assurance, and Education Program has the authority to require that programs alter their start date in order to promote a safe learning environment for program participants.
6. Should youth program directors/coordinators fail to comply with the operational requirements for conducting MSU youth programs, the Youth Programs: Registration, Safety Assurance, and Education Program has the authority to deny the program's request to operate.
7. **Review process:**
  - i. The MSU Youth Programs: Registration, Safety Assurance, and Education Program reviews youth program leaders' registration responses and corresponding uploaded materials in the Youth Safety Portal.
  - ii. Programs that comply with operational requirements will receive confirmation that their program has successfully been registered and may move forward with programming.
  - iii. Programs that either do not align with the operational requirements or include details or plans that require additional information will be given feedback and asked to make necessary changes before proceeding with their program.
  - iv. Programs that violate safety guidelines and operational requirements may be denied the opportunity to move forward with program operations.
  - v. Program conditions and activities that may result in increased risk or safety concerns may require additional reviews by other campus experts, including but not limited to the MSU Office of the General Counsel; the MSU Office of Audit, Risk and Compliance; MSU Risk Management and Insurance; MSU Environmental Health and Safety; and the Office of the University Physician.
  - vi. In the event of a public health and/or safety concerns, Michigan State University and the Youth Programs: Registration, Safety Assurance, and Education Program reserve the authority to:
    - a. Suspend, delay, or cancel youth program operations;
    - b. Alter program operation conditions and/or modalities;
    - c. Issue additional operational requirements for youth programs; and
    - d. Enact additional review processes to determine whether programs may proceed to operate.
8. **Exception:** 4-H and MSU Extension programs must register through their respective program registries.

**B. Program Handbook.** Units sponsoring a youth program must develop and distribute a program handbook to participants and their parents/legal guardians. Programs can fulfill this requirement using the program handbook template documents provided by the Youth Programs: Registration, Safety Assurance, and Education Program. Each program handbook must include the following information:

1. Emergency preparedness, general safety and security precautions, and how to report safety concerns.
2. Procedures for notifying a minor's parent/legal guardian in case of emergency, including medical or behavioral situations.
3. Information for parents/legal guardians on how to contact the participant during the program.
4. Program rules, including conduct expectations, for participants in the program, including the fact that participants must abide by all University regulations and may be removed from the program for violation of such rules. Program rules must include the following:
  - Prohibition against the possession or use of alcohol, tobacco, drugs, fireworks, guns, and other weapons.
  - Rules about when participants may leave campus during the program.
  - Clear statement that no violence of any kind will be tolerated.
  - Clear statement that no theft of property regardless of owner will be tolerated.
  - Clear statement that sexual harassment, sexual abuse, and other sexually inappropriate conduct will not be tolerated.
  - Clear statement that any violation of the University Anti-Discrimination Policy will not be tolerated.<sup>[ 11]</sup>
  - Clear statement that hazing and bullying (physical, verbal, or cyber-bullying) will not be tolerated.<sup>[ 14]</sup>
  - Clear statement that misuse or damage of University property is prohibited and participants may be financially responsible for damage or misuse of University property.
  - Clear statement that prohibits the inappropriate use of cameras, imaging and other digital recording devices, including camera, imaging, and other digital recording applications on smart phones and mobile devices, in showers, restrooms, locker rooms, and other areas where privacy is expected by participants.
5. Rules that identify areas of the program facilities where participants may be restricted from entering (e.g. storage rooms, equipment rooms, athletic training rooms, staff/faculty/administrator offices) and/or equipment that participants may be restricted from using. A description of the process to be followed if a participant, group leader, or other individual associated with a youth program is alleged to have violated University policies or conduct rules of the program, including the process for dismissal and removal from the program.

6. A description of the process to be utilized for the parent, legal guardian, or other responsible adult to pick up the participant if he/she is dismissed from the program early.
7. Inclusion of the University's model statements describing how requests for accommodation may be made for participants with disabilities.<sup>[1]</sup>
8. Inclusion of the University Anti-Discrimination Policy.<sup>[11]</sup>
9. Inclusion of information regarding the University Relationship Violence and Sexual Misconduct Policy, including contact information for the Title IX Coordinator and options for filing a report.
10. Housing specific policies, if applicable, addressing:
  - ii. Curfew time that is age-appropriate for participants;
  - iii. Restriction of non-programmatic visitation between participants to occur only in public, supervised spaces and only during approved hours specified by the program;
  - iv. Restriction of visitation by non-participant guests to only occur in public, supervised spaces in the building and only during approved hours specified by the program;
  - v. Requirement that separate accommodations are provided for adults and minors, except when housing minors with their parents or guardians; and
  - vi. Requirement that program participants, staff, and volunteers must comply with all security measures and procedures specified by MSU Police and Public Safety and Residence Education and Housing Services.
11. For tour programs that require program participants to be accompanied by chaperones at all times, program handbook can be replaced with a chaperone guide. To meet this requirement, program leaders must use the Chaperone Guide template provided by the MSU Youth Programs: Registration, Safety Assurance, and Education Program.

**C. Program Management.** Units are expected to adhere to the following program requirements when conducting youth programs:

1. Obtain all media, medical, and liability releases as a part of the program registration process. All data gathered shall be confidential, is subject to records retention guidelines, and shall not be disclosed, except as provided by law.
  - i. Utilize the standard medical treatment authorization form for all participants.<sup>[2]</sup>
  - ii. Utilize the standard media release and parent/guardian consent form for all program participants as part of the registration process.
  - iii. Utilize the standard parent/guardian release of responsibility form ("Pick-up/Drop-off/Commuter Form") for all participants who are authorized to commute independently or be released to a specified adult other than the participant's parent or legal guardian during the duration of the specified program.
2. Provide adequate supervision for minors during the program. In determining the appropriate level of supervision, the program will consider the number, age, and gender of participants, the activities involved, the age and experience of staff / volunteers, and the supervision standards for residential and non-residential programs provided by the American Camp Association (ACA).<sup>[8]</sup>
3. In the event of a medical emergency, contact local emergency medical services.

4. Follow appropriate safety measures approved by the Office of Environmental Health & Safety for laboratory and research work.<sup>[12]</sup>
5. Minors must be assigned housing separately from adults.
  - i. Exception: a minor may be housed in the same room as the minor's parent/guardian.
6. Vendors contracted for services provided for youth programs must meet the vendor requirements outlined in Section 75 of the University's Manual of Business Procedures.<sup>[10]</sup>

**D. Annual Staff Training.** Units are expected to provide annual training to program staff and volunteers that addresses the following topics:

1. Program responsibilities and expectations
2. Program policies and procedures
3. What to do in the event of a crises or emergency
4. Emergency preparedness, general safety and security precautions, and how to report safety concerns
5. University Reporting Protocol: Child Abuse and Other Harm to Children<sup>[3]</sup>
6. University Anti-Discrimination Policy<sup>[11]</sup> and reporting obligations
7. University Relationship Violence and Sexual Misconduct Policy and reporting obligations<sup>[15]</sup>
8. Prohibition of retaliation against minors, families, parents, guardians, and staff/volunteers who report allegations of inappropriate conduct including but not limited to abuse, neglect, assault, harassment, sexual assault, sexual abuse, sexual harassment, child pornography, furnishing alcohol, drugs, and/or sexual materials to a minor, and violations of the University's Anti-Discrimination Policy
9. Conduct rules for staff and volunteers outlined in this policy
10. Units operating a youth athletic activity must comply with the training requirements of the Michigan sports concussion law<sup>[6]</sup>

**E. Participant Orientation.** Units are expected to provide orientation to participants that addresses the following topics:

1. Program safety and security procedures and reporting options
2. University rules, program rules, and behavioral expectations
3. Reporting options related to violations of the University's Anti-Discrimination Policy and Relationship Violence and Sexual Misconduct Policy
4. University Reporting Protocol: Child Abuse and Other Harm to Children<sup>[3]</sup>
5. University Anti-Discrimination Policy<sup>[11]</sup>

**F. Conduct Rules for Youth Program Staff and Volunteers.** Units are expected to notify program staff and volunteers of applicable program rules, including conduct expectations. Program staff and volunteers must abide by all University regulations and may be removed from the program for violation of such rules. Program rules for program staff and volunteers must include the following:

1. The supervision ratio expectations addressing the number of adults who must be present during activities where minors are present.
2. Youth program directors and coordinators must make reasonable efforts to limit one-on-one contact between adults and minors participating in youth programs.
  - i. Reasonable efforts must be made to have two or more adults present during activities where single minors are present.
  - ii. Reasonable efforts must be made to involve more than one adult in any direct electronic contact with single minors.
  - iii. Staff/volunteers should make reasonable efforts to have another adult staff/volunteer present when addressing single participants in private areas (e.g.: restrooms, bedrooms, study lounges, and similar areas).
  - iv. If handling an emergency when only one minor is present, the adult responding should make reasonable efforts to contact another adult to come and assist as immediately as possible.
  - v. Staff expected to contact single minors for official academic or programmatic recruitment may do so as directed by their supervisor by E-mail or phone call during standard business hours.
3. Adults may have no personal, non-programmatic related electronic communications with participants (email, phone, text, Facebook, etc.) during the youth program.
4. Adults may not take pictures of minors or post information about minors to social media sites without permission from a parent/guardian.
5. Adults may not meet participants off-site or off-hours.
6. Adults may not give personal gifts to participants.
7. Adults may not possess, consume, or be under the influence of alcohol, medical marijuana, or illegal drugs at any time the adult has responsibility for minor participants.
8. Adults may not possess a firearm or other weapon at any time during the youth program.
9. Adults may not violate the University's Anti-Discrimination Policy.<sup>[11]</sup>
10. Adults may not engage in abusive conduct of any kind toward, or in the presence of, a minor.
11. Adults may not strike, hit, administer corporal punishment of any kind to, or touch a minor in an inappropriate or illegal manner.



12. Adults may not pick up minors from or drop off minors at their homes, other than the driver's child/children, or except as specifically authorized in writing by the minor's parent/legal guardian.
13. Adults may not provide alcohol or illegal drugs to any minor.
14. Adults may not provide prescription drugs or any medication to any minor except for medical professionals specifically authorized in writing by the parent or legal guardian as being required for the minor's care or emergency treatment.
15. Adults may not make sexual materials in any form available to minors or assist them in any way in gaining access to such materials.
16. Adults may not retaliate against minors, families, parents, guardians, and staff/volunteers who report allegations of inappropriate conduct including but not limited to abuse, neglect, assault, harassment, sexual assault, sexual abuse, sexual harassment, child pornography, furnishing alcohol, drugs, and/or sexual materials to a minor, and violations of the University's anti-discrimination policy.
17. If an allegation of inappropriate conduct including but not limited to abuse, neglect, assault, harassment, sexual assault, sexual abuse, sexual harassment, child pornography, furnishing alcohol, drugs, and/or sexual materials to a minor, and violations of the University's anti-discrimination policy is made against an adult participating in a program, including program staff/volunteers, the accused adult must be removed from any further participation in programs and activities covered by this policy until such allegation has been satisfactorily resolved.

**G. Reporting Protocols.** Youth program staff, volunteers, and other individuals associated with a youth program must adhere to the University Reporting Protocol: Child Abuse and Other Harm to Children <sup>[3]</sup> and the University Reporting Protocol: Relationship Violence, Sexual Misconduct, and Stalking..<sup>[15]</sup>

Information about MSU Policies related to Title IX:

1. MSU [Anti-Discrimination Policy](#) and [Relationship Violence and Sexual Misconduct Policy](#) apply to all MSU students, employees, or third-party community members, including Youth Program participants.
2. Consistent with Title IX, MSU's Relationship Violence and Sexual Misconduct Policy and Anti-Discrimination Policy expressly prohibit discrimination on the basis of sex.
3. The [University Reporting Protocol: Relationship Violence and Sexual Misconduct](#) provides a procedure for reporting sexual misconduct (including sexual harassment and sexual assault), which applies to youth program participants.
4. Title IX of the Education Amendments of 1972 prohibits discrimination on the basis of sex in any education program or activity that receives federal funding. Discrimination on the basis of sex includes: Excluding, separating, denying benefits to, or otherwise treating a person differently on the basis of sex; sexual harassment; and sexual assault.
5. MSU's Title IX Coordinator oversees the University's compliance with Title IX, including its complaint procedures, and is available to meet with youth program participants about matters involving sex discrimination.

**Nicole J. Schmidtke**

Title IX Coordinator

Office for Civil Rights and Title IX Education and Compliance

5 Olds Hall

East Lansing, MI 48824

Phone: (517) 884-0610

Website: [civilrights.msu.edu](http://civilrights.msu.edu)

6. All individuals who believe they have been subject to possible violations of MSU's Anti-Discrimination Policy and Relationship Violence and Sexual Misconduct Policy are encouraged to report to MSU's Office of Institutional Equity (OIE), law enforcement, or both. OIE is responsible for receiving and processing complaints of sex discrimination (including sexual harassment, sexual assault and sexual violence), which may involve an investigation. If a person is unsure about reporting and would like assistance in understanding the options, they may contact a Confidential Resource.

- [Find a comprehensive list of these resources.](#)
- [Find a list of these resources specifically available for youth.](#)

**[Report to the Office of Institutional Equity \(OIE\)](#)** by completing the online Public Incident Reporting Form or by calling, emailing, or visiting the OIE office.

Address: 408 W. Circle Dr., Suite 5, Olds Hall, East Lansing, MI 48824

Phone: 517-353-3922

E-mail: [oie@msu.edu](mailto:oie@msu.edu)Online reporting: [Public Incident Reporting Form](#)

**[Contact MSU Police and Public Safety](#)** (or your local law enforcement) for assistance in filing a criminal complaint and preserving physical evidence

**MSU Police and Public Safety**

Address: 1120 Red Cedar Rd., East Lansing, MI 48824

Emergencies: call 911

Non-Emergency Line: 517-355-2221

**H. Transportation of Minors.** Units operating a youth program that involves transportation of minors must comply with the following requirements:

1. University employees and volunteers that transport minors must have been subject to a Michigan driver records check<sup>[4]</sup> within the last twelve months.<sup>[5]</sup>
2. Although the use of private vehicles for transporting minors should be avoided, when private vehicles must be used, drivers must have automobile liability insurance.
3. More than one adult must be present in the vehicle except when there are multiple minors for the duration of the transportation.

4. University youth programs utilizing commercial transportation services must follow the guidelines outlined in the statements regarding “Services Provided & Request Forms” in Section 35 of the University’s Manual of Business Procedures.<sup>[9]</sup>

**I. Concussion Awareness.** Units operating a youth athletic activity must comply with the requirements of the Michigan sports concussion law.<sup>[6]</sup>

**J. Third-party Programs.** MSU units sponsoring/hosting third-party youth programs must communicate MSU’s safety policies and procedures, conduct standards, and reporting protocols.

1. MSU units sponsoring/hosting third-party youth programs must document a formal agreement with the third-party youth program.
  - i. All agreements between MSU units and third-party youth programs must be reviewed by MSU’s Office of the General Counsel.
  - ii. All agreements between MSU units and third-party youth programs must require background checks for adults participating in the program and that the third-party program leaders and adults participating in the program to be provided and briefed on MSU’s safety policies and procedures, conduct standards, and reporting protocols, which are outlined in this policy.
  - iii. Third-party youth programs operating through an agreement with a sponsoring/hosting MSU unit must comply with all requirements documented in each agreement with MSU units. Failure to comply with all requirements may result in termination of services.
2. MSU units sponsoring/hosting third-party youth programs must conduct safety checks to ensure that appropriate supervision, safety controls, and facility access controls are implemented.
3. Authorized personnel/signatories for non-University groups using University facilities must certify that all third-party personnel have been vetted through a criminal background check, including a sex offender registry check, within the past 12 months.
  - i. Exception: Pre-K-12 teachers accompanying minors at a third-party youth program in the official capacity of their role must be vetted in accordance with their school district’s policies and procedures.
4. Authorized personnel/signatories for non-University groups using University facilities must provide to the sponsoring unit satisfactory evidence of compliance with all of the requirements outlined in the agreement at least thirty (30) days prior to the scheduled use of University facilities, as well as an approved agreement for use of University facilities, if applicable.

**K. Vendors and Contractors.**

1. MSU youth program leaders entering an agreement with internal and/or third-party vendors/contractors must consult with MSU’s Office of the General Counsel regarding a formal contract or memorandum of understanding detailing the terms of the agreement, including a notice of MSU’s safety policies, procedures, conduct standards, and reporting protocols with respect to minors on campus, which are outlined in this policy.

## L. Remote, Virtual, and Hybrid Youth Programs.

All Operational Requirements for Conducting University Youth Programs apply for remote instruction methods, with the following modifications:

- The Pick-up, Drop-off, Commuter form does not apply.
  - The Medical Treatment Authorization form does not apply.
1. Providing Access for the MSU Youth Programs: Registration, Safety Assurance, and Education Program
    - i. When registering the program in the Youth Safety Portal, program directors must provide the Director of Youth Programs access to all online instruction, including but not limited to:
      - a. Links and passwords to review recorded instruction
      - b. Links and passwords to view live sessions
    - ii. Note: Submitting these links and passwords is not binding. They can be updated after they are submitted. When changes are made, all updated information must be shared with the Director of Youth Programs immediately.
  2. Instruction Platform Security
    - i. Whenever possible, all instruction sessions must be secured with a password.
    - ii. Whenever possible, turn off chat box, screen sharing, whiteboards, file transfer features, and other features that allow participants to communicate in an unmonitored fashion to prevent participants from sending pictures or other content over the in-meeting chat feature.
      - a. Note: If any of these features is required for the instruction, ensure the feature is safe and moderated.
    - iii. Mute all participants to prevent unauthorized interruptions.
    - iv. Deactivate screen sharing for all participants when the feature is not being used for an activity to prevent unauthorized interruptions.
    - v. Ensure all online programming links are only provided for intended participants and their parents/guardians.
      - a. Do not publicly advertise the instruction sessions and links.
      - b. Only provide the links and passwords for instruction platforms by invitation to the participants who have registered to participate.
  3. Statement on “Zoom Bombing”
    - i. Definition: “Zoom Bombing” is the act of accessing Zoom sessions without authorization.
    - ii. MSU prohibits “Zoom Bombing” and similar disruptive behaviors.
    - iii. Appropriate consequences, including but not limited to dismissal from the program may apply to anyone who:
      - a. Violates program safety and security rules;
      - b. Contributes to “Zoom Bombing” or other similar disruptions; and/or
      - c. Shares program links, passwords, or other program login information with individuals outside of the program.
  4. Avoiding 1:1 Interactions with Minors by Program Leaders, Staff, Faculty, and Volunteers

- i. To ensure quality instruction and effective monitoring of participant interactions, all live program sessions must involve at least two instructors.
    - a. If not possible to have another adult present, a supervisor must have the link and be able to drop into the call at any time.
    - b. Good practice suggests assigning one instructor to take the lead in program facilitation and the other to take the lead on monitoring participant interactions (e.g. activities, interpersonal behaviors, verbal discussions, chat box, etc.).
  - ii. Adults may not communicate with minors digitally or in-person outside of the program.
  - iii. Adults may not have direct electronic contact with minors without another adult (e.g. program staff, program co-lead, program leader's supervisor, participant's parent/guardian, etc.) included in the communication.
  - iv. Program staff may contact participants only through official program channels (program E-mail, instruction platform, etc.)
  - v. Program leaders and staff may not record interactions with minors through online instruction platforms.
5. Additional Conduct Expectations for Program Leaders, Staff, Faculty, and Volunteers
- i. Adults must wear attire appropriate for typical in-person University programming and business.
  - ii. Adults must use a neutral background (e.g. blank wall, digital Zoom filter, limited exposure of private spaces, etc.)
    - a. The goal is to prevent showing much of the inside of the home in the interest of privacy and safety.
  - iii. Adults may not share inappropriate content through files, images, videos, chat, audio, or other features of the digital instruction platform.
  - iv. Adults may not screen shot or record other participants' images, information, or participation contributions during the program.
    - a. If a program leader must record an activity for instructional purposes, please contact the MSU Director of Youth Programs at [protect@msu.edu](mailto:protect@msu.edu) and describe the nature of the activity and why you will need to record the activity. Upon review by all necessary parties, additional guidelines will be provided if your request is approved.
  - v. Anyone receiving threatening or inappropriate chat messages should immediately report it to a trusted MSU official and the appropriate authorities (e.g. MSU Police and Public Safety, local police, Office for Institutional Equity, Children's Protective Services, etc.).
  - vi. When creating an online profile for the instruction platform or any other online account, limit the information that is shared.
    - a. For example, just because the platform asks for your address does not mean that you have to provide your actual personal address.
    - b. If a picture is required, the picture provided should be neutral and appropriate.
    - c. Be thoughtful of the information is shared in the virtual meeting itself.
    - d. Keep in mind that attendees could screenshot or record the meeting without your knowledge.

- e. In the interest of safety, do not share links, passwords, or other program login information with anyone outside of the program.
  - f. MSU prohibits “Zoom Bombing” and similar disruptive behaviors.
6. Additional Conduct Expectations for Program Participants
- i. Participants must use a neutral background (e.g. blank wall, digital Zoom filter, limited exposure of private spaces, etc.).
    - a. The goal is to prevent showing much of the inside of the home in the interest of privacy and safety.
  - ii. Participants may not share inappropriate content through files, images, videos, chat, audio, or other features of the digital instruction platform.
  - iii. Participants may not screen shot or record other participants’ images, information, or participation contributions during the program.
  - iv. Participants may not record interactions with other participants through online instruction platforms.
  - v. When creating an online profile for the instruction platform or any other online account, limit the information that is shared.
    - a. For example, just because the platform asks for your address does not mean that you have to provide your actual personal address.
    - b. If a picture is required, the picture provided should be neutral and appropriate.
    - c. Do not share personal information in the virtual meeting.
  - vi. Anyone receiving threatening or inappropriate chat messages should immediately report it to a trusted adult.
  - vii. In the interest of safety, do not share links, passwords, or other program login information with anyone outside of the program.
  - viii. MSU prohibits “Zoom Bombing” and similar disruptive behaviors.

**M. Safety Assurance Site Visits.** The Youth Programs: Registration, Safety Assurance, and Education Program, in partnership with MSU Office of Audit, Risk and Compliance, must routinely conduct safety assurance site visits for MSU youth programs to confirm adequate supervision (per ACA supervision ratio standards), safety controls, and facility access controls are implemented.

1. **Selection Criteria:** The factors considered when determining the order of selection for Safety Assurance Site Visits include, but are not limited to: program length, number of personnel interacting with minors, age of participants, historical safety concerns, transition in program leadership, status of reported compliance with requirements, concerns identified in anonymous reports to the Office of Audit, Risk and Compliance, urgency of concerns for requested site visits, and conditions presenting high levels of risk.
2. MSU youth program directors/coordinators must provide all necessary access to the authorized safety assurance site visit personnel in order to conduct the safety assurance site visit.
3. The MSU Youth Programs: Registration, Safety Assurance, and Education Program will provide feedback on observations from the safety assurance site visit. MSU youth program directors/coordinators must work with the MSU Youth Programs: Registration, Safety Assurance, and Education Program to implement prescribed adjustments related to feedback from the safety assurance site visit.

## VII. History

This document was issued by the Office of the President on August 12, 2013, and revised on October 15, 2013, April 18, 2014, September 22, 2014, May 4, 2017, and January 1, 2023.

## VIII. Model Forms:

- [Medical Treatment Authorization](#)
- [Media Release](#)
- [Parent Guardian Consent](#)
- [Pick-up/Drop-off/Commuter Form](#)

## IX. Tools and Resources

For more information, please visit <https://youthprograms.msu.edu>. Consultations can be requested by contacting [protect@msu.edu](mailto:protect@msu.edu).

<sup>[1]</sup> The University's model statements can be found at <https://www.rcpd.msu.edu/services/accommodations>.

<sup>[2]</sup> Programs may use alternate forms if they are approved by the Office of the General Counsel.

<sup>[3]</sup> The University's policy, University Reporting Protocol: Child Abuse and Other Harm to Children, details reporting requirements for University employees and volunteers, and can be found at [https://hr.msu.edu/policies-procedures/university-wide/reporting\\_protocols.html](https://hr.msu.edu/policies-procedures/university-wide/reporting_protocols.html).

<sup>[4]</sup> The Michigan Driver Record Request Form can be found at <https://rmi.msu.edu/assets/rmidocuments/midriverrequest.pdf>.

<sup>[5]</sup> Drivers must have a valid driver's license; not have had three or more convictions for moving violations within the past 36 months; not have been convicted of operating a vehicle while under the influence of alcohol or drugs, leaving the scene of an accident, failure to report an accident, driving with a suspended license or reckless driving within the past 36 months; and not have been convicted of obtaining a vehicle unlawfully, possessing a stolen vehicle, or using a vehicle in a crime or in connection with an unlawful act.

<sup>[6]</sup> A detailed description of the Michigan sports concussion law and a compliance checklist can be found at [http://www.michigan.gov/mdch/0,4612,7-132-54783\\_63943---,00.html](http://www.michigan.gov/mdch/0,4612,7-132-54783_63943---,00.html).

<sup>[7]</sup> A detailed description of the self-disclosure processes for Faculty, Academic Staff and Executive Management can be found at <https://hr.msu.edu/policies-procedures/faculty-academic-staff/fas-policies-procedures/CriminalCheck.html>.

<sup>[8]</sup> A detailed description of American Camp Association (ACA) supervision standards can be found at <https://www.acacamps.org/resource-library/accreditation-standards/aca-standards-relate-staff-screening-supervision-training>.

<sup>[9]</sup> A detailed description of Section 35 of the Manual of Business Procedures can be found at <http://ctrl.msu.edu/comb/mbp35.aspx>.

<sup>[10]</sup> A detailed description of Section 75 of the Manual of Business Procedures can be found at <https://ctrl.msu.edu/combp/mbp75EBS.aspx#I20>.

<sup>[11]</sup> The University Anti-Discrimination Policy (ADP) states expectations for institutional and individual conduct. A detailed description of the ADP can be found at [https://hr.msu.edu/policies-procedures/university-wide/ADP\\_policy.html](https://hr.msu.edu/policies-procedures/university-wide/ADP_policy.html).

The ADP User's Manual provides further discussion of the definitions of behaviors prohibited by the ADP as well as the relationship between the First Amendment and complaints of harassment/discrimination; the ADP User's Manual can be found at <https://civilrights.msu.edu/assets/documents/adp-users-manual.pdf>.

Protocol for addressing Bias Incidents, Acts of Prohibited Discrimination/Harassment, and Hate Crimes can be found at <https://oie.msu.edu/assets/documents/bias-incident-reporting-protocols-17.08.01.pdf>.

<sup>[12]</sup> A detailed description of the Office of Environmental Health and Safety standards for Laboratory & Clinical Safety can be found at <https://ehs.msu.edu/lab-clinic/index.html>.

<sup>[13]</sup> The Michigan Sex Offender Registry can be accessed at [http://www.michigan.gov/msp/0,4643,7-123-1878\\_24961---,00.html](http://www.michigan.gov/msp/0,4643,7-123-1878_24961---,00.html). The National Sex Offender Registry can be accessed at <https://www.nsopw.gov/en-us>.

<sup>[14]</sup> A definition of bullying provided by the Michigan State Board of Education can be accessed at [http://www.michigan.gov/documents/mde/SBE\\_Model\\_AntiBullying\\_Policy\\_Revised\\_9.8\\_172355\\_7.pdf](http://www.michigan.gov/documents/mde/SBE_Model_AntiBullying_Policy_Revised_9.8_172355_7.pdf). A definition of hazing provided by the Michigan Penal Code can be accessed at [http://www.legislature.mi.gov/\(S\(4fhuiwry13kfw5ftz0lpswul\)\)/mileg.aspx?page=GetObject&objectname=mcl-750-411t](http://www.legislature.mi.gov/(S(4fhuiwry13kfw5ftz0lpswul))/mileg.aspx?page=GetObject&objectname=mcl-750-411t).<sup>[15]</sup> The University Relationship Violence and Sexual Misconduct Policy can be accessed at <https://civilrights.msu.edu/policies/relationship-violence-and-sexual-misconduct-and-title-ix-policy.html#reportingobligationsforresponsibleemployees>.