

Employing Minors in UAB Labs or Other Hazardous Areas

The University of Alabama at Birmingham acknowledges that there are productive reasons for minors to be present in university work areas. Because of the concerns related to potential exposures to physical, chemical, radioactive, and biological hazards, particularly in the research laboratories, the following guidelines are necessary to ensure that potential exposures are minimized.

This procedure is intended for any individual who is 16-17 years old (enrolled or not enrolled in high school) or 18 years old and currently enrolled in high school. The University does not employ anyone under 16 years of age in any capacity. Individuals working in the Hospital must be at least 18 years of age. UAB Human Resources maintains a Class II Child Labor Certificate for employing 16 and 17 year olds (this certificate replaces the need for individual work permits).

RESPONSIBILITIES

- ❖ The Principal Investigator, UAB faculty-in-charge and/or Department Head/Director must submit a *Request for Clearance* form (see pg 3) for minors seeking employment in any laboratory, patient care or potentially hazardous area. The *Request for Clearance* must be approved by UAB Occupational Health and Safety (OH&S), before it is forwarded to Human Resources for appointment processing (see flowchart on page 2).
- ❖ The Principal Investigator, UAB faculty in charge and/or the Department Head/Director shall be responsible for ensuring that minor employees under their direction have had appropriate immunizations, safety-related training, issued necessary personal protective equipment and that associated documentation has been completed.

Documentation should be provided showing that the minor's proposed work/potential exposure at UAB and the minor's medical history has been reviewed by his/her personal physician. A statement indicating this, to include any work restrictions, must be signed by the physician on his/her office letterhead and provided to the **UAB OH&S Employee Health Program, 933 S 19th St, Suite 445, Birmingham, AL 35294,**

If the minor will not work in a lab or potentially hazardous area, lab clearance is not required. However, you must complete the top section of the *Request for Clearance* form (pg. 3) and submit the clearance form with the ACT and other attachments to HR Records. Be sure to add a note in the comment section of the ACT document --"minor will work in a non-hazardous area".

- ❖ Minors employed in UAB laboratories or other hazardous areas
 - **Minors under 16 years of age may not be employed in any capacity at UAB** (Policy 125, UAB Personnel Policies and Procedures).
 - **Minors may not be employed in any of the 17 FLSA prohibited occupations**, such as driving a motor vehicle, operating power-driven machines, or roofing operations. For a complete listing of prohibited occupations visit <http://www.dol.gov/elaws/esa/flsa/docs/haznonag.asp>.
 - No minor may participate in research related activities where there is potential exposure to human blood, body fluids, or infectious diseases.
 - Minors may not work with regulated amounts of radioactive materials or ionizing radiation. See the UAB Radiation Safety Procedures Manual or contact UAB Radiation Safety for additional information on exempt quantities and exempt concentrations.
 - No minor may participate in activities where there is potential exposure to reactive or highly energetic material, carcinogens, reproductive toxins, or highly toxic agents.
 - Minors must be instructed on occupant life safety such as familiarity with the building, normal egress routes, emergency egress routes, changes in egress due to construction or maintenance operations, fire safety procedures and emergency preparedness.
 - The minor must be informed of potential hazards in the lab area and receive documented training in safe laboratory procedures, including, but not limited to, emergency procedures.
 - The parent or guardian must acknowledge in writing that they have been informed of the minor's participation in a program where hazardous material may be present or hazardous activities may take place and consent to such participation.
 - Minors with approval to enter a laboratory or other restricted area must be directly supervised by a responsible employee of that area at all times.
 - The Supervisor/Principal Investigator may place additional restrictions on the presence of minors in their work area.

Compliance with the above is monitored through periodic OH&S audits. Appeals can be made to the Assistant Vice President, Occupational Health and Safety, CH19, Room 445 or 934-2487

Please contact HR Recruitment Services at 934-4030 for questions about this process.

The policy which addresses **non-compensated minors (volunteers/visitors)** falls under the scope of the [Policy on Minors in Laboratories and Animal Facilities](#). For more information, contact the Office of the Vice President for Research and Economic Development, AB 720 or 934-4224.

Employing Minors Approval Process

It is the responsibility of the PI/Faculty Member/Dept Head/Director/Appointing Department to obtain approval from OH&S before submitting the approved request for clearance form along with documents below to the Human Resources Records Administration Office.

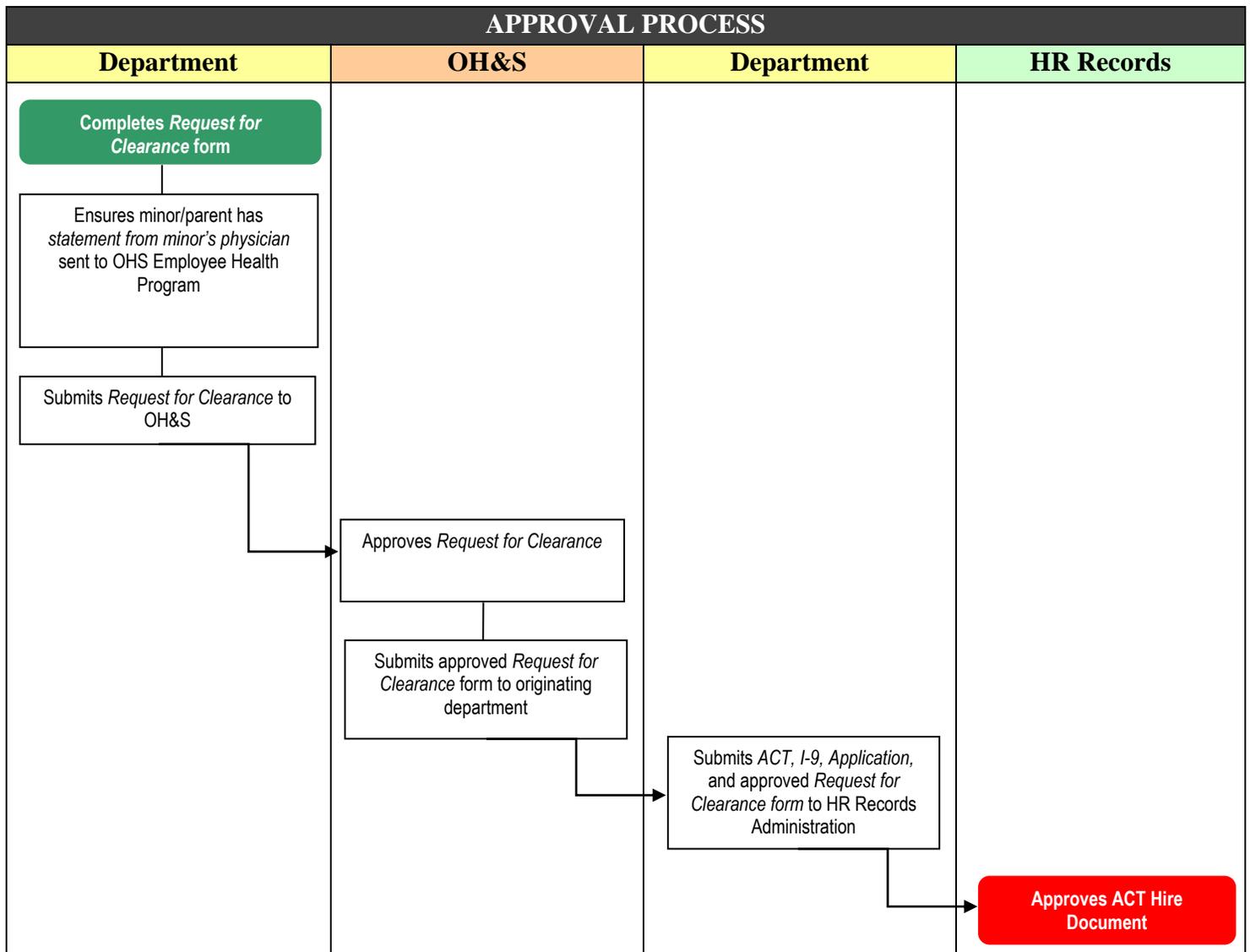
The following documents must be submitted to the OH&S for approval. Request must be submitted to OH@S two weeks prior to hire date for timely processing.

- **Completed *Request for Clearance* form**
- **Statement from minor’s physician regarding minor’s medical history**

The following documents must be submitted to HR Records Administration (AB 254, Zip 0102) for appointment processing. *If your department has an internal ACT approval process (approval through Chairman’s or Dean’s Office, etc), please adhere to your department’s internal approval process and follow up with your appropriate department contact to ensure ACT documentation is routed to HR Records Administration for final approval.*

- **ACT Document**
 - For non-UAB students, use assignment category = 04 (irregular), Title = Non-UAB Student Assistant
 - For UAB students, use assignment category = 06 (student), Title = Student Assistant

(Irregular and student employees are not eligible for any UAB benefits or privileges of employment)
- **[Student/Irregular Application](#)**
- **I-9**
- **Approved *Request for Clearance* form**



UAB HUMAN RESOURCES
Request for Clearance/Consent for Employing Minors

Request must be submitted to OH&S two weeks prior to hire date for timely processing

_____ (hereinafter referred to as "participant")
(Print Name of Participating Minor)

_____ (Address including City, State, Zip) _____ (Telephone Number)

_____ (Participant's Date of Birth) _____ (Participant's Age)

Enrolled in High School? _____ Yes _____ No _____ School of Attendance

Anticipated Hire Date _____ Anticipated End Date _____

If the minor will not work in a lab/hazardous area stop here and submit this form along with the ACT and other documentation to HR Records; if the minor will work in a lab, please continue completing the remainder of this form and submit completed form to OH&S, CH19 445.

The named participant will work in laboratory related activity at the University of Alabama at Birmingham (UAB) under the direction of:

PI/Faculty/Dept Head/ Dir: _____ **Dept:** _____ **Location of Lab:** _____

Detailed description of duties/activities:
(please attach a sheet if more space is needed)

Please indicate by checkmark that the following will be addressed and associated documentation will be placed on file in the department:

Safety Related Training: Issuance of Personal Protective Equipment:

A statement, signed by the minor's physician on the physician's office letterhead, indicating that the minor's medical history and proposed work/potential exposure at UAB has been reviewed, should be forwarded to the UAB OH&S Employee Health Program, 933 S 19 Street, Suite 445, Birmingham, AL 35294.

Signature of PI/ Faculty/ Dept Head/Dir **Printed Name of PI/Faculty/Dept Head/Dir** **Date** **Phone**

Return this approved form to: _____ **Email:** _____ **Phone:** _____
This approved form will be returned by OH&S to the person listed above.

Campus Address: _____ **Fax:** _____

Some laboratory facilities or related locations at UAB are potentially hazardous environments. Even under ideal conditions, including the proper use of materials and adherence to safety procedures, a risk of personal injury exists. The attached Potential Hazard Information Table provides the most common potential hazards, but it is not intended to be an exhaustive list. Failure to adhere to established procedures may result in greater risk. The participant will receive appropriate training concerning how to identify hazards and how to work safely with materials, equipment, and animals (if applicable) and will be supervised in the handling of instrumentation, materials, and animals that may pose a risk. I understand that the participant may be removed from the project on a temporary or permanent basis if he or she refuses, or is unable, to follow the safety rules, to wear assigned personal protective equipment, or to perform activities as directed.

Prior to participation, I agree to notify the above-named faculty member/researcher or supervisor of any allergies or other physical, mental, or emotional condition that might limit the participant's ability to safely participate in activities in the laboratory.

I give permission to the University of Alabama at Birmingham, its physicians, faculty and staff members, agents, and services to provide such emergency care and treatment to the minor as in their judgment may be deemed necessary or may be advisable in the event that the minor should require emergency care while participating in the project at UAB. I agree to assume the costs of such emergency care and treatment if any such costs are incurred.

I, the undersigned Parent/Guardian of the above-referenced participant, acknowledge that I understand and hereby agree to the above:

Signature of Parent/Guardian **Printed Name of Parent/Guardian** **Date** **Daytime Phone**

Emergency Contact (other than parent) _____
Emergency Phone

OH&S APPROVAL:

Occupational Health & Safety: _____ Date: _____

Potential Hazard Information Table*

Potential Hazards	General Information	Examples
Animals	Research animals represent a variety of species, temperaments and health conditions. They can cause physical injuries; transmit zoonotic diseases (diseases passed from animals to humans); or be a source of allergens or toxins.	Scratch, bite (physical injury) Rabies, toxoplasmosis (zoonotic disease)
Chemicals	A chemical is a refined compound that may be in the form of a solid, liquid or gas. Potential injuries include burns of the skin or eyes; respiratory problems; allergic reactions; irritation of skin, eyes, and mucous membranes; and illness. Based on their specific effect, chemicals may be classified in one or more of these categories: <ul style="list-style-type: none"> • Allergens – cause allergic reactions • Carcinogen – produce cancer • Teratogen – affect male and female reproductive systems; may cause birth defects in the developing fetus. • Flammables – burn or explode • Reactives – react explosively • Corrosives – cause tissue damage with contact including inhalation • Toxins – cause illness or death upon exposure. (Neurotoxins specifically affect the nervous system). 	Benzene (carcinogen) Thalidomide (teratogen) Acetone, xylene, alcohol (flammables) Peroxides, acrylamide (reactives) Acids & bases (corrosives) Cyanide (toxin)
Equipment and Instrumentation	Potential hazards from mechanical or electrical equipment include loud noises, very high or very low temperatures, electrical shock, and pinching/crushing injuries. FLSA prohibits minors from engaging in certain dangerous occupations. See examples. For a complete listing of the 17 prohibited occupations visit http://www.dol.gov/elaws/esa/flsa/docs/haznonag.asp .	Autoclaves/sterilizers (burns) Driving a motor vehicle Power-driven machines, hoisting apparatus, saws and guillotine shears Roofing operations
Gases	Gases may be toxic, corrosive, or flammable. They may cause eye and skin irritations, respiratory problems, light-headedness, asphyxiation, and fainting. Some gases are stored in metal cylinders under high pressure. Compressed gas cylinders can explode causing injury from high speed projectiles.	Nitrogen, helium, any other non-oxygen gas (asphyxiant) Hydrogen (flammable) Ammonia (toxic)
Lasers	Light of a single color emitted in a narrow beam. Hazards from lasers are classified as <ul style="list-style-type: none"> • Class 1 – No hazard • Class 2 – Insufficient power to cause eye damage within the normal aversion response time. (Class 2a is a Special-case Class 2 laser designed to be inaccessible to viewing.) • Class 3a – Direct viewing of the beam can cause eye injury • Class 3b – Direct and indirect viewing of the beam can cause eye injury. • Class 4 – Direct and indirect viewing of the beam can cause eye injury. Also, a potential fire hazard. 	Nitrogen lasers (Class3b) Examples of Class 4 lasers used at Jefferson Lab: Free Electron Laser; Argon ion laser, Ti-Sapphire laser, and diode laser
Microbiological Agents	Living organisms such as viruses, bacteria, fungi, prions, and parasites. Those that are capable of causing disease are called pathogens. The affects of these agents are organism dependent and can range from mild, treatable to severe, untreatable. Hazards from microbiological agents are classified as <ul style="list-style-type: none"> • Biological Safety Level 1 – no hazards to healthy adults • Biological Safety Level 2 – cause mild to severe illness • Biological Safety Level 3 – cause severe illness and possible death • Biological Safety Level 4 – Not allowed at UAB 	Baker's Yeast & E. coli K12 (Level 1) Influenza, Polio & Salmonella (Level 2) Tuberculosis & AIDS (Level 3)
Radiation/Radioactive Materials	High energy particles (alpha & beta) or waves (X-rays). Unprotected exposure can cause skin or eye damage, cellular damage, and long term health problems.	Uranium, Phosphorus ³² , Sodium ³⁵ , X-rays
Recombinant Materials	DNA that has been genetically engineered (altered) by combining it with DNA from another source. Viruses may be used as vectors to infect (transfect) cells with the foreign DNA. A transgenic organism is one that has had genes from another organism inserted into its genes. The consequences of introducing such foreign genes into a human body may be difficult to predict.	Adenovirus, adeno-associated virus (viral vector)
Toxins	Poisons produced by microbiological organisms, plants, or animals. These agents can cause tissue and organ damage or death.	Ricin (plant) Snake venom (animal)

*This table is to be used as reference for the forms: **Consent for a Minor in Laboratories or Animal Facilities and Request for Clearance/Consent for Minors Employed at UAB**