The University of Akron

Youth Protection Program Guidelines

Compliance and Risk Management Office
Last Revised: February 2024

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PROGRAM OVERVIEW

The University of Akron is committed to providing a safe and secure environment for Youths participating in Youth Programs, as outlined in the University's Youth Protection Policy. These Guidelines provide additional information and resources to assist Youth Program Directors and Personnel in implementing the Policy and managing University-Sponsored Youth Programs. The Guidelines will evolve over time, so please make sure you are using the most up-to-date version on the Compliance and Risk Management Office's webpage.

REGISTRATION AND APPROVAL OF UNIVERSITY-SPONSORED YOUTH PROGRAMS

All University-Sponsored Youth Programs must be registered in advance with The University of Akron Compliance and Risk Management Office. Registration for previously approved, ongoing programs should be completed before the start of the semester (Fall, Spring, Summer) that the Youth Program will take place. Starting in March 2024, registration for all other Youth Programs must be completed at least thirty (30) days before the Youth Program starts. Program Directors are responsible for ensuring that registration is timely completed. Before registering a Youth Program, Program Directors must have the approval and support from their department leader for the Youth Program.

If the CRMO identifies potential risks with the Youth Program during its review of the registration information, Program Directors may be required to provide additional information or take risk mitigation actions before the program proceeds. Alternatively, the CRMO may provide limited exceptions or alternative ways to satisfy the requirements in the YPP policy and these guidelines. Program Directors should consult early in the planning process with the CRMO on new Youth Programs and/or activities therein if/as needed.

REQUIREMENTS FOR YOUTH PROGRAM DIRECTORS AND PERSONNEL

Background Checks and Self-Disclosure

Program Directors and Personnel must complete Bureau of Criminal Investigation (BCI) and Federal Bureau of Investigation (FBI) background checks at least every two (2) years. The only exception is for Program Personnel that will not have contact with Program Participants outside of a classroom setting (example: guest presenters).

Program Directors are responsible for ensuring that they and all Program Personnel have acceptable background checks before they may engage with Program Participants. Background checks that identify arrests, pending charges, and/or criminal convictions for the following (or ones similar in nature) are not acceptable:

- Murder, manslaughter, or criminally negligent homicide
- Assault or battery
- Kidnapping
- Sexual offenses (including harassment)
- Stalking
- Crimes against or involving children (including child pornography, abuse, neglect, or endangerment)
- Domestic violence
- Human trafficking
- Drug related offenses

The University reserves the right to consider other convictions as reasons for disqualification of a person from working with University-Sponsored Youth Programs.

The University of Akron School of Counseling offers background check services. More information about these services may be found on the School of Counseling's website.

Program Directors and Personnel are required to self-disclose to the CRMO any arrests, pending charges, or criminal convictions (other than minor traffic offenses) of the above nature that they receive prior to or during the Youth Program and refrain from working with the Youth Program until authorized by the CRMO. The CRMO will consult with the Office of General Counsel and other appropriate University officials in determining whether the Program Director or Personnel may proceed in working with the Youth Program and, if so, any necessary additional safeguards.

Training

All Program Directors and Personnel must complete training on the following topics initially and refresh their awareness annually thereafter. The only exception is for Program Personnel that will not have direct contact with Program Participants outside of a classroom setting (example: guest presenters).

Required training for Program Directors and Personnel:

- Online course: Child abuse prevention: Protecting minors (Ohio)
- These Guidelines and all program-specific guidelines and protocols

Additional training for Program Directors:

- Online course: Title IX (refresher)
- Online course: Hazing Prevention (refresher)
- Online course: Information Security Awareness

The above online courses are available on the University's [Brightspace Compliance Training](#) page. Program Directors can contact support@uakron.edu to have themselves and Youth Personnel enrolled.

Program Directors are responsible for ensuring that they and all Program Personnel have completed the requisite training before they may engage with Program Participants.

REQUIREMENTS FOR PLANNING AND EXECUTION OF YOUTH PROGRAM

Documentation

Program Directors must ensure that their Youth Programs develop and implement the following:

- Daily agenda with the planned activities, locations, and timeframes
- Program Personnel Code of Conduct ([template](#) or equivalent)
- Program Participant Code of Conduct ([template](#) or equivalent)
- Program Personnel and Participant Roster (including contact and emergency contact information)
- Package for communication with parents/guardians, including requisite forms:
    - Detailed agenda
    - Drop off and pick up procedures
    - Informed Consent, Release and Medical Authorization for a Minor ([template](#) or equivalent)
    - Medical Information and Authorization to Dispense Medication ([template](#) or equivalent)
    - Images Release Form (if applicable) ([template](#) or equivalent)*
    - Student Recreation and Wellness Center Release, Waiver and Medical Authorization (if applicable) (see [Facility waivers](#))
- Safety Protocols and Emergency Action Plan ([template](#) or equivalent)
- [Incident Reporting Form](#)

*If UA engages a vendor/contractor to take photographs, video or other images during the program, coordinate with the UA Purchasing Department for vendor/contractor selection and the requisite professional services agreement form.

Marketing Materials

Youth Programs must follow the [brand standards](#) set by University Communication & Marketing (UCM) for marketing and advertising material.

Supervision During Youth Program

Youth Programs must have a procedure for checking in and out Program Participants. Program Participants may not be allowed to leave the Youth Program except with their parent/guardian or someone authorized in writing by the same. Attendance must be regularly checked, and the Emergency Response Plan must have a procedure to address missing Program Participants.

Except for private lessons (see below), each Youth Program must have at least two Program Personnel (one of which may be the Program Director), unless an exception is received in advance from the CRMO. The following minimum supervision ratios (staff: participant) must be maintained at all times during the Youth Program:

Age of Participants	Day-Only Camps	Overnight Programs
5 years and younger	1:6	1:5
6-8 years	1:8	1:6
9-14 years	1:10	1:8
15-17 years	1:12	1:10

Based on American Camp Associations (ACA) Standards

Except for private lessons, one-on-one interactions with Youth is prohibited. Interactions include communications such as telephone, mail, email, texting, and other forms of communication.

The Program Personnel Code of Conduct must provide additional expectations for supervision and conduct by Program Directors and Personnel.

For private lessons, the parent/guardian of the Youth must be given the option to be present and must consent in writing to one-on-one contact with the Program Director or Personnel. Whenever possible, private lessons should take place in a room with interior windows and/or an open door.

Overnight Programs

Youth Programs must provide supervision for Program Participants while they are in the University's housing or any off-site locations. University Housing staff are responsible for building operations and do not provide supervision or other support for Youth Programs.

Program Directors for Youth Programs with overnight housing must implement and communicate to Youth Personnel additional protocols including:

- Program Personnel should not enter Program Participants rooms unless necessary. If it is necessary to check on a participant or in the event of an emergency, two Program Personnel should be present. Doors should always remain open.
- A curfew that is age-appropriate for the Program Participants.

Transportation

Transportation of Program Participants should be limited to necessity and only for Program-related purposes. In general, any planned group travel to locations off University Facilities should be arranged with a reputable, licensed, and insured transportation entity (example: bus company).

When transport in other vehicles is required (example: cars or vans), more than one Program Personnel must be present in the vehicle, except when multiple participants will always be in the vehicle. Drivers must have current, valid licenses and insurance, and must follow all driving rules and regulations. Drivers and passengers must always wear seatbelts.

Medical Information and Medication Management

Information about Program Participants' medical information (including allergies) and medications must be communicated in writing by parents/guardians before the Youth Program starts (see above section on Documentation for templates). Because Program Directors and Personnel are typically not licensed medical professionals, medication must be limited to ones that Program Participants can self-administer and Program Personnel are capable of storing and handling.

Each Youth Program should appoint a Medical Coordinator. The coordinator is responsible for reviewing the medical and medication information submitted by parent/guardians, holding any medication bags (explained below), and maintaining the Medical Administration Record (explained below). Medical information is private and contains personally identified information and must be handled and stored confidentially in accordance with Section 7 below.

Parents/guardians should place all medications (except for rescue medication – such as inhaler or Epi-Pens – which should be carried by Program Participants) in a plastic bag with the participants' first and last name. Medications must be in their original containers with the dosage instructions and other pertinent medication.

The Medical Coordinator will review the information received from parents/guardians to confirm that it matches the medication received. The Medical Coordinator will maintain medication bags and give them to Program Participants as indicated. Medical Coordinators should not administer or give guidance on the medications. All medication and medical bags must be returned to the Program Participants' parent/guardian at the end of the Youth Program.

Accommodating Disabilities

Any review and accommodations for Program Participants requested under the Americans with Disabilities Act (ADA) will be conduct on a case-by-case basis with the support of the Office of General Counsel, Office of Accessibility, and other relevant University partners.

Safety Protocols and Emergency Response Plan

Youth Programs must have appropriate safety protocols in place for all planned activities in the Youth Program. All Youth Programs must also have an Emergency Action Plan for managing and reporting potential incidents (examples: injuries and illness, weather related emergencies, natural disasters, active assailants, acts of violence, missing Youth, etc.). The plan should also include how pertinent emergency procedures and information will be communicated to the parents/guardians of Program Participants. Youth Programs should have emergency contact information for Program Directors, Personnel and Participants readily accessible.

Any incidents involving injuries or illnesses must be documented on the Incident Reporting Form. Copies should be shared with EOHS and the CRMO.

REPORTING REQUIREMENTS

If the Program Director or Personnel knows or reasonably suspects that a Program Participant has suffered or may suffer child abuse, neglect, or endangerment, they must report the situation to:

- The University of Akron Police Department (330-972-2911)
- City of Akron Police Department: (330-375-2181); or
- Summit County Children Services

Program Directors and Personnel are considered "mandatory reporters" for purposes of the University's Gender-Based Misconduct and Title IX Policy and Protocol, and must follow the requirements and processes for reporting any gender-based misconduct of which they become aware, observe, or believe has occurred during a University-Sponsored Youth Program.

Any other concerns or questions about a Program Participant's safety and well-being should be reported to the Program Director and the Office of General Counsel. In the event of imminent danger or when immediate physical support is needed, always contact the UAPD.

If an allegation of inappropriate conduct is made concerning the Program Director, Personnel, or another person involved with the Youth Program, they must discontinue any

further participation in the Youth Program until they receive approval from the Office of General Counsel.

<div style="background-color:#1F3864; color:white; padding:4px;">DATA PROTECTION AND RECORDKEEPING</div>

Youth Programs must take appropriate measures to control and protect any personal data and information that is collected, stored, and used by UA (examples: contact information, gender identity, medical information, financial information). Youth Programs must follow University's applicable information security rules and policies, including [Secure Access and Data Storage Standards](#) and [IT Data Access Policy](#).

There are additional [legal](#) and [UA rule requirements](#) for Youth Programs that directly accept and process payment information directly from parents/guardians, such as credit card or personal checks as forms of payment. It is preferrable to use a third-party provider such as Cashnet for payment methods.

Program Directors are responsible for ensuring the following documents are retained in accordance with the University's applicable [record retention schedule](#):
- Copies of the documents outlined above in Section 5.A.
- Records of any incidents, injuries, and illnesses that occurred during the Youth Program

<div style="background-color:#1F3864; color:white; padding:4px;">QUESTIONS AND SUPPORT</div>

The [Compliance and Risk Management Office](#) can assist with questions about the Policy, these Guidelines, or Youth Programs.

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