

# Programs Serving Minors on Campus

## FAQs for Programs Serving Minors at CSU

### What is the purpose of the new CSU policy for programs serving minors?

The policy is effective for programs operating on or after May 1, 2017.

### My department has been sponsoring the same program with minors for the last 10 years, so do the procedures apply to our program?

Yes.

## Policy Requirements

### What type of program is covered under this policy?

This policy applies to academic camps, athletic camps, after-school programs, mentoring activities, workshops, child-care facilities, conferences and similar activities which involve the custody and care of non-enrolled minors which are conducted, hosted or sponsored by CSU.

### Are there any programs serving minors that are excluded from this policy?

Yes. The Programs Serving Minors policy does not apply to:

1. Programs and/or activities on campus which are open to the general public and which minors attend at the sole discretion of their parents or guardians (e.g. athletic events, concerts, plays, etc.);
2. Programs and/or activities, including experiential programs, designed for enrolled University students;
3. Non-residential field trips to CSU supervised by a minor's school or organization;
4. Student recruitment activities, including open houses and admissions visits and tours, that are scheduled to last no longer than one day and do not include an overnight stay; and
5. National tests offered by the CSU Testing Center.

### Is a program that involves only one minor subject to the requirements of the Programs Serving Minors policy?

YES, even programs that involve one minor must comply with the requirements of the Programs Serving Minors policy. Note that one-on-one mentoring scenarios do qualify as a "program" for the purposes of the policy. Minors enrolled or matriculating at CSU are exempted from the policy.

### A professor in our department has an informal agreement with a local high school to allow the students to work on their projects in one of our department labs. The students are not receiving any dual credit for the project. Is this considered a program that would be subject to these procedures?

Yes, the professor needs to register this activity as a program serving minors. Any University faculty members, staff and/or CSU students supervising or assisting the high school students in this activity would be considered a Program Director/Responsible University Official under the policy. All Program Directors/Responsible University Officials must (1) have a current satisfactory background investigation on record with CSU, and (2) complete CSU-approved annual training.

### Our department coordinates with local middle and high schools to provide after-school programming. Faculty members and students have a rotating schedule to go to the school for an hour or two in the afternoon and work with the kids. Would this activity be covered by these procedures?

No. If the middle or high school is sponsoring and facilitating the program, and CSU's faculty and students are serving as volunteers at the school, it would not be a program covered by this Policy.

**Does this policy apply to third party organizations that use CSU facilities for programs serving non-enrolled minors?**

Yes.

**Is a facility use agreement / license agreement required for non-affiliated third party organizations that use CSU facilities for programs serving non-enrolled minors?**

Yes. The required facility use agreement / license agreement must include language requiring the non-CSU entity to comply with institutional policies on background checks, training and minimum insurance requirements. In accordance with [BOR Policy 9.10.6.3](#), the form used for such agreements must be USG-approved. Facility use agreements / license agreements must be approved by the Division of Legal Affairs.

**My department is allowing a third party to use some of our space for a program serving minors. Who is responsible for ensuring the program is approved?**

All programs serving minors held on CSU campus facilities must operate under the administrative purview of a CSU sponsoring unit. In this case, the sponsoring unit would be the department, because it is facilitating the third party's use of the CSU facility. The department is responsible for submitting a Programs Serving Minors application for review.

**One of our coaches is hosting an independent summer day camp at CSU. Since the coach is a CSU employee, is s/he required to follow the procedures?**

Yes. As an independent host, the coach in this example would essentially become a third-party organization, and the CSU sponsoring unit facilitating the coach's use of the CSU space must submit a Programs Serving Minors application for review.

## Program Registration

**How do I register our program?**

Please visit the [Programs Serving Minors Registry](#) page of this website for instructions.

**How much time does it take to get approval of my program?**

All applications should be submitted at least 60 days prior to the start date of the program.

**Over the course of a semester, our department puts on several programs that are all part of one initiative. Do we need to register it as one program or each as an individual program?**

Consider how the programs will be staffed and how your records are maintained. If the same or similar program staff will manage all of the events and you will be maintaining your relevant records in one place that would be easy to produce if asked, it may make sense to register the events as one program. If there will be different staff handling each event and multiple participant lists, waivers and permission forms, it would be better to register each event individually.

**Our department offers the same program every semester. Can we just register the program once and be done?**

No. The registration form requires a start date and end date for the program. For programs that are held at regular intervals with the same program staff, you may complete the registration form once for a given period of time, but at minimum, it should be filled out annually.

## Background and Training Requirements

### **Who is subject to the background investigation and training requirements of the new policy?**

All Program Directors/Responsible University Officials (individuals, paid or unpaid, who are authorized by CSU to have direct contact or interaction with minors during a program serving minors). For CSU-affiliated activities, all background investigations must be conducted through the CSU Office of Human Resources.

### **Must the CSU Office of Human Resources conduct background investigations for non-CSU affiliated third-party organizations?**

No. Non-CSU affiliated third-party organizations must provide certification to the Program Director that satisfactory background investigations have been completed for their Program Directors/Responsible University Officials before the Third Party Activities may begin.

### **As part of our program, we have invited a local guest lecturer to give a presentation. Does the Guest Lecturer need to have a background check and go through the training?**

If the Guest Lecturer is alone with the minors at any point, then Guest Lecturer qualifies as a Program Director/Responsible University Official under our Policy. In the event that a Program Director/Responsible University Official with the Program is present in the room during the Guest Lecturer's presentation and any interactions with the minors thereafter, the Guest Lecturer does not meet the definition of a Program Director/Responsible University Official. However, in such cases, the Program Director has the discretion to treat the Guest Lecturer as a Program Director/Responsible University Official who would be subject to all of our policy requirements.

### **How often must background checks be performed for Program Director/Responsible University Officials (employees, students, interns, volunteers, independent contracts/consultants) working in programs serving non-enrolled minors?**

A minimum of every 3 years.

### **Who is responsible for the cost of the background checks?**

The Sponsoring Unit (the CSU unit offering the program) will be responsible for the cost of the background checks.

### **My department is hosting a camp for non-enrolled minors. A number of our Program Director/Responsible University Officials have current background investigations from a third party entity. Can we use those background investigations in lieu of going through Human Resources?**

No. The University-approved method of obtaining background investigations for a CSU-affiliated activity is through Human Resources.

### **Do our program staff have to do the online training that is listed on the CSU Programs Serving Minors website, or can we have them go through different training?**

All Program Directors/Responsible University Officials must complete CSU-approved training annually. The approved training will be available on this website. However, the Program Director may contact [legalaaffairs@columbusstate.edu](mailto:legalaaffairs@columbusstate.edu) should he/she wish to utilize different training.

Non-CSU affiliated third-party organizations or agencies may substitute CSU approved training with another training, but such training must be approved by the Program Director. At a minimum the training must include mandatory reporting requirements, responsibilities and expectations, relevant CSU policies, safety and security procedures, and Staff and Program Participant Codes of Conduct.

**Who is responsible for ensuring that program staff have received the required training?**

Program Directors.

**Who should I contact at CSU if I have questions about this policy and CSU procedures required by this policy?**

Email any questions to [legalaffairs@columbusstate.edu](mailto:legalaffairs@columbusstate.edu) so they can be addressed by the CSU Legal Affairs team.

## **Contact Information**

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