

School of Medicine & Health Sciences

THE GEORGE WASHINGTON UNIVERSITY

Policy for Minors in SMHS Research Laboratories

Purpose

GW SMHS is committed to providing a safe and healthy laboratory environment for all members of the campus community and visitors. This policy describes the requirements that must be fulfilled before minors will be allowed to participate in research educational activities in laboratories of the School of Medicine and Health Sciences (SMHS) at George Washington University. The goal of this policy is to help protect the health and safety of the minor and to prevent injury arising from a potential exposure to harmful agents or conditions.

Individuals Covered by This Policy

This policy applies to minors who are visitors, volunteers, employees, interns, individuals participating in “shadowing” or other outreach programs, and contractors at the School of Medicine and Health Sciences.

Definitions

- A “minor” is a person under 18 years of age.
- A “laboratory” is a research or clinical setting where scientific research or instruction is conducted.
- Laboratories often contain hazardous materials and/or physical safety hazards, described in their Safety Plan that is annually reviewed by Laboratory Safety.
- A “laboratory supervisor” is the individual (e.g., principal investigator, faculty educator, lab manager, etc.) that has direct operational control over the laboratory.

Permission and Facilities Access

Minors are not allowed in a laboratory without completion of the permission and facilities access form. In most cases, minors are also required to obtain a DC work permit. All records will be kept by SMHS facilities, which will reserve the right to terminate access if conditions are not met (Hellen Olumilu; holumilu@gwu.edu).

Touring Labs/Observers

Minors may enter a GW laboratory as part of an authorized and supervised tour/visit. Laboratory tours may only be conducted at times when all hazardous materials are properly stored and are not being used for experiments. Minors participating in tours or visits must be supervised at all times and may not participate in any laboratory activities. The laboratory supervisor will be responsible for supervision and for providing appropriate personal protective equipment for visitors.

Minors visiting laboratories should be advised of any lab-specific hazards (e.g., chemical, biological, radioactive, physical, etc.) that exist in the lab and the procedures for reporting and responding to accidents while in the lab.

Laboratory Restricted Activities by Age Group

The following restrictions apply to minors in SMHS laboratories.

Minors Under 14: No minors under the age of 14 may be present in an SMHS laboratory.

Minors Under 18: Minors under the age of 18 are prohibited from handling:

- Radioactive materials
- Particularly Hazardous Substances, such as:
 - Acutely toxic substances - LD50 oral ≤ 50 mg/kg; LD50 contact ≤ 200 mg/kg or LC50 inhalation ≤ 200 ppm
 - Carcinogens - Any substance that is regulated by OSHA as a carcinogen, or is listed under the category "known to be carcinogens" in the Annual Report on Carcinogens published by the National Toxicology Program (NTP) or is listed under Group 1 "carcinogenic to humans", Group 2A or 2B "reasonably anticipated to be carcinogens" by the International Agency for Research on Cancer Monographs (IARC).
 - Reproductive hazards (mutagen or teratogen) or other chemical restrictions
- Biological Hazards: Minors may not work with, or be at risk of exposure to, infectious agents. In particular, minors must be isolated from the following biological hazards:
 - Biosafety Level 2 (BSL-2, BSL-2+), Biosafety Level 3 (BSL-3), and Biosafety Level 4 (BSL-4) pathogens
 - Primary human and non-human primate materials
 - Biological Select Agents or Toxins
 - Risk Group 2 recombinant materials and viral vectors
- Controlled Substances: Minors may not have unsupervised access to areas with controlled substances. Controlled substances are narcotic and non-narcotic substances regulated under the federal Controlled Substance Act.
- Highly hazardous chemicals, including pyrophorics, explosives, large quantities of flammable materials, and compounds having a rat oral LD50 less than or equal to 50mg/Kg.
- X-ray generating equipment
- Class 3b or 4 lasers that require registration with the Radiation Safety Officer.
- Animals: Minors may not access, handle, or work with vertebrate laboratory animals.
- Areas requiring the use of respirators.

Exceptions

This policy provides for limited exceptions to these requirements that would allow participation in research based upon review and written approval by the SMHS Dean for Research, the Office of General Counsel and the GW Biosafety Officer.

Laboratory Safety Training

All minors must complete both General Laboratory Safety and the Biosafety/Bloodborne trainings before beginning research educational activities. Although minors are not allowed to work with bloodborne pathogens, training is required to reduce any accidental exposure. The General Laboratory Safety training is offered by the Office of Health and Emergency Management Services (<https://safety.gwu.edu/laboratory-safety>), and the Biosafety/Bloodborne training offered by the Office of Laboratory Safety (<https://labsafety.gwu.edu/>).

Requirements of Laboratory Supervisors

Laboratory supervisors are responsible for the safety of personnel in their laboratories.

The laboratory supervisor may delegate supervision of minors to trained and knowledgeable lab personnel, however the laboratory supervisor retains primary responsibility.

The laboratory supervisor must determine which hazards the minor may be exposed to and review the following with the minor:

- Nature of potential hazards
- Safe operating procedures and emergency procedures for equipment
- Explicit and specific instructions regarding the laboratory work which the minor will undertake

The laboratory supervisor will:

- Ensure that the minor is directly supervised by the laboratory supervisor or designee at all times.
- Provide appropriate personal protective equipment.
- Complete the “Research Release and Facility Access Form for Minors” and submit for approval.
- Ensure and verify that the “Research Release and Facility Access Form for Minors” has been completed by the minor and their guardian prior to allowing the minor into the laboratory.
- Ensure that minors have completed the required training prior to allowing access to the laboratory.
- Ensure that all University faculty and staff members and students who will be working with minors in the laboratory comply with all reporting requirements of the POM Policy while the minor is involved in the program.

Requirements of Minors

- The parent of a minor working a laboratory must sign and return a “Research Release and Facility Access Form for Minors” before a minor can begin work in the lab. The minor must sign the second page of this form.
- Complete required Laboratory Safety Training before starting any research educational activities in the laboratory.
- Obtain a DC work permit prior to working at GW.
- Abide by and follow laboratory safety practices and procedures.
- Use appropriate personal protective equipment when working in the laboratory.
- Report the accidents or injuries to the laboratory supervisor or designee.
- Do not enter the laboratory without direct supervision of the laboratory supervisor or designee.

DC Work Permits

All minor employees need a permit **before** they begin work at GW. Obtain a permit [here](#).

Work Permit Restrictions: Ages 14-15

Minors age 14 or 15 are allowed to work no more than six consecutive days a week, no more than 48 hours a week, and no more than eight hours any day. He/she may not work before 7:00 a.m. or after 7:00 p.m. (except June 1st through Labor Day, he/she may work until 9:00 p.m.).

Work Permit Restrictions: Ages 16-17

Minors aged 16 or 17 are allowed to work no more than six consecutive days a week, no more than 48 hours a week, and no more than eight hours any day. They may not work before 6:00 a.m. or after 10:00 p.m.

Required Forms:

Research Release and Facility Access Form for Minors

[DC Work Permit Application](#)

Resources for Policies:

[Harvard University- Minors in Labs](#)

[Boston University- Policy of Minors in Laboratories](#)

[University of Montana- Guidelines for Minors in Laboratories](#)

[NIH 3015 - Admittance of Minors to Hazardous Areas](#)

[University of California, San Francisco \(UCSF\) Environment, Health, and Safety Policy: Minors in Laboratories](#)

[Georgetown University- District of Columbia Requirements When Employing Minors](#)

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