University of Michigan
Children on Campus Program Overview
Risk Management

Standard Practice Guide 601.34
Purpose

- Introduction of policy
- Policy overview
- Policy requirements
  - Registration
  - Insurance
  - Criminal background checks
  - Training
  - Standardized documentation
- Reporting
Policy Introduction

“To promote the health, wellness, safety, and security of children who are entrusted to the university’s care, custody and control, or who participate in programs held on university property.”

—SPG 601.34

- Owner—Executive Vice President and Chief Financial Officer
- General Administration and Oversight—Risk Management Services
- Effective Date: January 2014
Policy Overview

Applies to:
- U-M programs/events serving children
- Non U-M programs/events serving children within U-M facilities

Exceptions:
- Children who are enrolled at U-M or attending academic classes
- Children participating in private or public events accompanied by parents/legal guardians or their designees
- Children who are subjects of IRB-supervised research—under review
- Children employed by the U-M
- Children during delivery of medical care services
- Children who are guests of family members
Web Based Resources

- Program planning resources
- Program registration
- Background check requests
- Training resources
- Template forms
- Checklists and resources
- Reporting
- Information for parents
- Public list of U-M registered programs

Available at: childrenoncampus.umich.edu
Policy Requirements

Registration
- Simple online registration at childrenoncampus.umich.edu
- Annual registration reminder
- Electronic form generation (if desired)

Insurance
- Required of all third parties using U-M facilities

<table>
<thead>
<tr>
<th>Line of Business</th>
<th>Per Occurrence Limit</th>
<th>Aggregate Limit</th>
</tr>
</thead>
<tbody>
<tr>
<td>General Liability</td>
<td>$1,000,000</td>
<td>$3,000,000</td>
</tr>
<tr>
<td>Directors &amp; Officers</td>
<td>$1,000,000</td>
<td>$3,000,000</td>
</tr>
<tr>
<td>Auto Liability</td>
<td>$1,000,000</td>
<td>$3,000,000</td>
</tr>
<tr>
<td>(if transportation is involved)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sexual Molestation*</td>
<td>$1,000,000</td>
<td>$3,000,000</td>
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</tbody>
</table>

* Recommended but not required
Policy Requirements

Criminal Background Checks

- All adults who will be supervising or have direct interaction with children
- Required every two years
- Order online through website
- Portable
- 60 days in advance
- Privacy protected
- No cost to program
- Minimum standards established
  - National criminal records check
  - National Sex Offender Registry
- Screening for specific groups may require alternative or additional review processes
Policy Requirements

Training
- Must be completed annually
- Training requirements specific to roles/responsibilities

<table>
<thead>
<tr>
<th>Adult Role</th>
<th>Minimum Training</th>
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<tbody>
<tr>
<td>Administrator/Planner</td>
<td>Code of Conduct</td>
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<tr>
<td></td>
<td>Program Development</td>
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<tr>
<td></td>
<td>Criminal Background Screening</td>
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<tr>
<td></td>
<td>Medical Issues</td>
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<tr>
<td>Adult working directly with children</td>
<td>Code of Conduct</td>
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<tr>
<td></td>
<td>Emergency Response</td>
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<tr>
<td></td>
<td>Supervision, Safety and Security</td>
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<tr>
<td></td>
<td>Medical Issues</td>
</tr>
<tr>
<td>Mandatory Reporters</td>
<td>Code of Conduct</td>
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<td></td>
<td>Supervision, Safety and Security</td>
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<td></td>
<td>Medical Issues</td>
</tr>
<tr>
<td>Child Abuse and Neglect</td>
<td></td>
</tr>
<tr>
<td>Adult working with children solely in a group setting</td>
<td>Code of Conduct</td>
</tr>
</tbody>
</table>
Code of Conduct

- We are all responsible for youth protection, as a group **and as individuals**

- Rules presented today are necessarily limited: use your judgment in accordance with these principles

- Common sense is expected from responsible adults

- If something “feels” wrong, it probably is wise to avoid it
Code of Conduct

- Establish Boundaries

- Employ the “Rule of Threes”
  - Do not be alone with an individual minor. If one-on-one interaction is necessary, meet in open, well-illuminated spaces or rooms with windows observable by other authorized adults or program staff, unless the one-on-one interaction is expressly authorized by the program administrator or is being undertaken by a healthcare provider.

- Communication

- General Safety
Code of Conduct

• Responsibilities
  ▪ Watch for problem areas (areas of non-compliance). If you are aware of a violation of the Code of Conduct, it is your OBLIGATION to report it.

• Resources and Guidance
  • There are many resources available to help you determine if there is a law, regulation, policy, procedure, or standard that would apply to a situation, including:
    ▪ Your supervisor
    ▪ The program sponsor or administrator
    ▪ Risk Management Services
    ▪ Division of Public Safety and Security
    ▪ Human Resources
    ▪ Compliance Hotline
    ▪ Office of the General Counsel
Supervision of Children

- All programs must establish a plan for adequate supervision
  - Identify the person having responsibility over all authorized adults serving in the program
  - Meet staffing requirements and ratios. Requirements may be waived by Risk Management.
  - Specify curfews, visitor rules, acceptable free-time activities

- “Line-of-sight” supervision is expected
  - Line-of-sight supervision can be modified for children at least 16 years of age

- Adults providing supervision or care to children must be at least 19 years of age; at least one adult must be 21 years of age or older
- Children may not be unattended or in the care of a person that is not a program-authorized adult
Supervision of Children

Medical Emergency or Injuries

- If EMS is needed, call 911. Know your street address so you can communicate when you call.
- If possible, remove other children—and adults who are not involved—from the area.
- Document all emergency interventions and inform first responders.
- Provide copies of “Medical Authorization to Treat” form.
- One adult from the program should accompany the child to the hospital.
- Notify parents/guardians or designated emergency contacts as soon as possible.
- Stay with the child until responsible adult arrives.
- Notify program administrator about the incident.
- Call (734) 764-2200 to notify Risk Management about the incident.
Supervision of Children

Medication Management

Administering Prescription Medication

- Program staff may only give medications to children with written authorization from parents/guardians
- Label all medications, including instructions

Self-Administration of Medications

- Whether participants are allowed to maintain their own OTC medication or whether Program staff will maintain OTC medication is left to the discretion of the Program Administrator.

Safety Precautions

- Keep in a secure area
  - Medications must be kept in a restricted location that is not accessible to children
- Store medications properly
  - Some medications require special handling (e.g., refrigeration). It’s important to understand any special requirements and make appropriate provisions to ensure the requirements are met
Supervision of Children

Medication Management

Self-Administration of Medications

- Subject to program safety review
  - The decision about whether or not to allow self-administration of medications is up to each individual program. **However, it is strongly recommended (when feasible) that an adult is responsible for securing medications.**

- **Consider:**
  - Age of children involved
  - Type of medication (OTC vs controlled substance)
  - Nature of program activities (physical intensity, temperature extremes, etc.)
  - Immediacy of need for self-administration (EpiPens, inhalers, insulin, etc.)
Supervision of Children

Special Situations

- Prepare in advance!

- Knowing what to do when an emergency arises requires careful advance planning and training
  - Injuries/Illnesses
  - Lost Children
  - Assault
  - Robbery
  - Harassment
  - Abuse or Neglect
Social Media Guidelines

• A. Communication (email, text) between an authorized adult and child must include another authorized adult or the parent/guardian of the child program participant

• Communication with children should be conducted in a group (chat, text or email) and should include at least (2) authorized adults

• Communication with children should occur using a child appropriate/group application such as Remind, Group Me, or Class Dojo.

• Child program participants may “Friend” the program or event community page if one exists but may not “Friend” the personal page of an authorized adult

• One-on-one social communication (Facebook, Twitter, Instagram or Snap Chat) is prohibited between an authorized adult and a child program participant.
Social Media Guidelines - Continued

• Note: Parents/Guardians have the right to request in writing that all forms of electronic communication between the child program participant and the authorized adults be discontinued.
Children On Campus Program Updates Effective 2019

• **Emergency Information Link** can be found under “Resources” on the Children on Campus Website

• Guidelines for the Following Have been added:

  1. Social Media
  2. Minors Working in Labs
  3. Data Storage (Sensitive documents, PHI related documents)
  4. Non-University Sponsored Program must also register on the Children on Campus Website
  5. Note Supervision Ratios have changed to align with state and federal regulations
# Updated Supervision Ratios

<table>
<thead>
<tr>
<th>AGE RANGE</th>
<th>NUMBER OF ADULTS</th>
<th>NUMBER OF CHILDREN</th>
</tr>
</thead>
<tbody>
<tr>
<td>Under 18 Months</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>18 mo. – 2 years</td>
<td>1</td>
<td>4</td>
</tr>
<tr>
<td>2 years – 5 years</td>
<td>1</td>
<td>8</td>
</tr>
<tr>
<td>5 years – 9 years</td>
<td>1</td>
<td>10</td>
</tr>
<tr>
<td>10 years – 13 years</td>
<td>1</td>
<td>12</td>
</tr>
<tr>
<td>14 +</td>
<td>1</td>
<td>20</td>
</tr>
</tbody>
</table>
Child Abuse and Neglect
Do Something!!!

Failure to Report

- Faculty, staff, and students who fail to comply with SPG 601.34 or other university policies will be subject to disciplinary action.

What if I am wrong?

- You may be concerned about reporting child abuse because you might be wrong.
- As long as you make a good-faith report, you are protected by the Michigan Child Protection Law from criminal or civil liability.
- You are also protected from criminal or civil liability if you participate in an investigation.
Children Abuse and Neglect

Individuals in certain occupations and professions are mandated reporters under state law.

Examples:

<table>
<thead>
<tr>
<th>Teachers</th>
<th>Coaches</th>
</tr>
</thead>
<tbody>
<tr>
<td>Doctors</td>
<td>Counsellors</td>
</tr>
<tr>
<td>Social Workers</td>
<td>Law Enforcement Officers</td>
</tr>
<tr>
<td>Child Care Providers</td>
<td>Nurses</td>
</tr>
<tr>
<td>Audiologists</td>
<td>Others</td>
</tr>
</tbody>
</table>

- Mandated reports must immediately report known or suspected mental or physical abuse or neglect of a child made known to them in their professional capacity to the Department of Health & Human Services by calling 855-444-3911 (24/7 toll free number)
- A written report must be submitted within 72 hours.

www.michigan.gov/mandatedreporter
Reporting

If you observe an adult abusing a child

- Intervene to stop the abuse, if it is safe to do so
- Call for help! 9-1-1 for Campus Police
- Make necessary internal and external reports

If you suspect that a child has been abused

- Immediately notify supervisor or Program Administrator
- A report must be made to law enforcement or Department of Human Services immediately
- Send copy of DHS 3200 Form to UMHS Child Protection Team

If you are not sure whether to report

- Consult with the Michigan Medicine Child Protection Team
- Err on the side of child safety and report to law enforcement or Department of Human Services: 855-444-3911
- Send copy of DHS 3200 Form to UMHS Child Protection Team
Reporting

- **Immediately report** to the police any of the following:
  - Knowledge or suspicion of child harm or other safety concerns
  - Illegal activity occurring in university sponsored activities in a university facility
- Do not investigate, question or otherwise involve yourself in gathering information
- Contact with parents or other involved persons should be done only with the permission of the police

**Risk Management**

- Kate Rychlinski  (734) 763-1587  kmrychli@umich.edu
- Denne Lawton  (734)763-8380  dslawton@umich.edu
- U-M Division of Public Safety and Security  (734) 763-1131

**Sexual Misconduct or Title IX Offenses:**

- [https://hr.umich.edu/working-u-m/workplace-improvement/office-institutional-equity/harassment-discrimination-reporting-form](https://hr.umich.edu/working-u-m/workplace-improvement/office-institutional-equity/harassment-discrimination-reporting-form)
Reporting

Injury/Incident Reporting

- Notify Campus Police and Risk Management of all serious injuries, accidents, property damage, or possible criminal activity
Questions?

- Risk Management Services  (734) 764-2200  
  childrenoncampus@umich.edu

- Children on Campus website  
  http://childrenoncampus.umich.edu

- Office of the General Counsel  (734) 764-0304  
  ppetrows@umich.edu