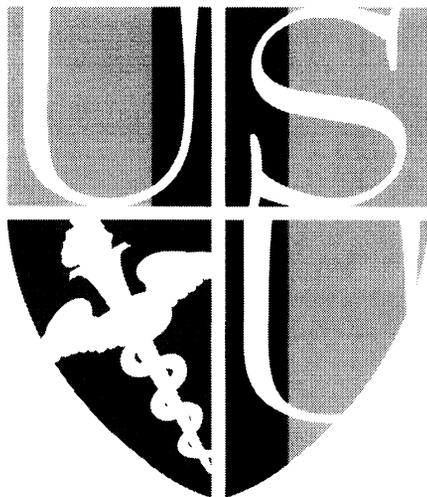


**USUHS  
INSTRUCTION  
6004**





# UNIFORMED SERVICES UNIVERSITY OF THE HEALTH SCIENCES



## SUBJECT: Minors Employed at the University

### Instruction 6004

(EHS)

APR 22 2002

#### ABSTRACT

This Instruction prescribes the procedures to be followed for the management of minors employed at the Uniformed Services University of the Health Sciences (USUHS).

**A. Reissuance and Purpose.** This Instruction reissues USUHS Instruction 6004<sup>a</sup> to:

1. Establish guidelines and procedures to protect minors from radiological, biological, chemical, and physical hazards found in the USUHS; and

2. Incorporate substantive administrative changes.

**B. References.** *See Enclosure 1.*

**C. Background.** On occasion, the USUHS hosts minors (16 years is the minimum age standard) as part-time residents. The minors are provided exposure to the USUHS and its research programs while the USUHS faculty and staff are the recipients of their part-time assistance. Since minors have special occupational protection requirements under federal and state regulations as outlined in 10 Code of Federal Regulations (CFR), Part 20<sup>b</sup> and 29 CFR, Part 570<sup>c</sup>, and may be more susceptible to occupational hazards, the USUHS has established guidelines and procedures in order to protect these individuals from radiological, biological, chemical, and physical hazards which may be found in the USUHS environment.

**D. Definitions.** *See Enclosure 2.*

**E. Applicability.** This Instruction applies to all USUHS personnel who provide oversight or supervision of minors, and to all participants in the Science and Engineering Apprentice Program (SEAP) or other federally sponsored hires or internship programs.

**F. Policy.** It is USUHS policy that:

1. Requests for exceptions to the age restriction will be submitted to the Department of Environmental Health and Occupational Safety (EHS) for approval. With regard to minors, the USUHS is required to comply with child labor regulations as outlined in 29 CFR, Part 570<sup>c</sup>, which sets a 16 year minimum age standard. Under the USUHS NRC License of Broad Scope<sup>d</sup>, the following restrictions apply:
  - a. individuals under the age of 18 will not be allowed inside "posted" laboratories without the permission of the USUHS Radiation Safety Officer (RSO),
  - b. visits of school groups or children of USUHS employees must be approved by the RSO,

c. minors between the ages of 16 and 18 may be allowed to work in "posted" laboratories with the permission of the RSO,

d. the handling of radioactive materials by minors is discouraged, but will normally be approved if the quantity of radioactive material handled is limited to activity levels listed in Schedule B of 10 CFR, Part 30, and

e. minors may be allowed to work in laboratories posted with radiation warning signs with permission of the RSO; however, no minors are allowed to work with any form or quantity of radioactive iodine;

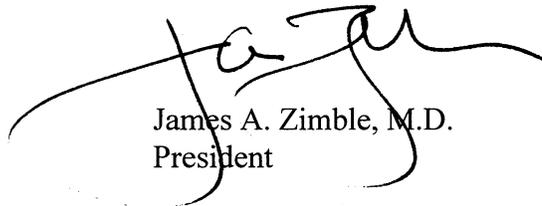
2. Minors will only work under the direct supervision of a Mentor, Principal Investigator (PI), Department Chair, Director, Branch Chief, or equivalent;

3. Minors will be allowed to work with certain laboratory protocols in specific areas as approved and supervised by their Mentor. Minors who work with animals must receive LAM-sponsored Animal Safety Training.

4. Minors may not work within the Biohazard suite or with any Biohazardous materials that require a BL2, BL3 or BL4 level containment.

5. Minors will not be allowed to work with Class III or IV lasers unless approved by the USUHS Laser Safety Officer (LSO). Such work will not be approved unless it can be shown that the minor will be directly supervised by an experienced laser user at all times. Furthermore, written parental consent is required to clear the minor for such work. In the event that approval is granted, the minor will not be allowed to start work until laser safety training has been provided by the LSO. The LSO must refer the minor to EHS for his/her a laser medical surveillance physical examination.

**G. Procedures.** *See Enclosure 3.*



James A. Zimble, M.D.  
President

Enclosures:

1. References
2. Definitions
3. Procedures

REFERENCES

- (a) USUHS Instruction 6004, "Minors Employed at the University," dated May 2, 1997 with change 1 dated June 28, 1999
- (b) 10 Code of Federal Regulations, Part 20, "Standards for Protection Against Radiation"
- (c) 29 Code of Federal Regulations, Part 570, "Child Labor Regulations, Orders and Statements of Interpretation"
- (d) USUHS Nuclear Regulatory Commission License of Broad Scope No. 19-23344-01
- (e) 10 Code of Federal Regulations, Part 30, "Rules of General Applicability to Domestic Licensing of Byproduct Material"
- (f) 29 Code of Federal Regulations, Part 1910.1000, Sub-part Z, "Toxic and Hazardous Substances"
- (g) American Conference of Governmental Industrial Hygienists (ACGIH), "2001 TLVs and BEIs, Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices"
- (h) USUHS Instruction 6002, "USUHS Occupational Health and Safety Program, Including Work Related Injuries or Illnesses and Medical Emergencies Involving University Employees," dated January 12, 2000
- (i) USUHS Instruction 6402-M, "Radiation Safety Guide," dated November 21, 2000
- (j) USUHS Instruction 6407, "USUHS Chemical Hygiene Plan," dated May 4, 1999
- (k) USUHS Instruction 6053-M, "USUHS Safety Manual," dated March 15, 1988

**DEFINITIONS**

Minor: An individual between the ages of 16 and 18 (as per 29 CFR, Part 570), who is either a guest or employee assigned to the USUHS under the supervision of a full-time USUHS employee (Mentor).

Posted: Refers to any laboratory in which radioactive materials are utilized under the USUHS Nuclear Regulatory Commission (NRC) License of Broad Scope.

## PROCEDURES

1. Mentors who propose to oversee minors in any part of the USUHS will complete USUHS Form 6050 for approval to the Civilian Human Resources (CHR) no later than 20 workdays before the proposed work start date. The work start date for paid or unpaid employment will be established by the Civilian Human Resources (CHR). Mentors will be aware of their responsibilities under USUHS Instructions 6002<sup>h</sup>, 6402-M<sup>i</sup>, 6407<sup>j</sup>, and 6053-M<sup>k</sup>. Mentors will ensure their minors' their orientation and signing out processes in and out of the USUHS through CHR.

2. CHR has initial approval authority over all requests for minors to work at the USUHS. A copy of the completed USUHS Form 6050 will be returned to the PI for each approved or disapproved request. CHR will retain the original copy.

3. The mentor will evaluate each minor's proposed work environment and activities in order to determine potential exposure to radiological, chemical, biological, and physical hazards. EHS will provide Hazard

Communication (HAZCOM) and Laboratory Safety training for all minors explaining the occupational hazards found at the USUHS. EHS will provide radiation safety training to all resident minors who either work directly with radioactive materials or who work in "posted" laboratories, in order to ensure their awareness of the potential hazards associated with those materials. Mentors will monitor all work situations for minors in compliance with the guidelines of this Instruction and other applicable instructions or regulations.

4. CHR will notify mentors when minors report for duty at the USUHS. CHR will direct minors to EHS for needed safety training. EHS will sign off on the CHR check-in-sheet when the training has been scheduled. Mentors will be responsible for ensuring that minors have been scheduled for training by reviewing the CHR check-in-sheet. Mentors are also responsible for ensuring that training is completed (endorsed copy of form 6050) prior to commencing work involving occupational hazards.

Attachment:  
USUHS Form 6050 (Rev 4/01)

**WORK ASSIGNMENT FOR A MINOR USUHS FORM 6050 (Rev. 1/02)**

Minor's Name: (Last) \_\_\_\_\_ (First) \_\_\_\_\_

Department: \_\_\_\_\_ <sup>1</sup>Mentor's Name: \_\_\_\_\_

Lab Room Numbers Minor will be working in: \_\_\_\_\_

MENTOR, please indicate potential hazards that minor could work with: (NOTE: check all that apply)

- Chemical
- Lasers , List highest ANSI Class: \_\_\_\_\_
- Animal
- Posted radiological lab
- NONE (e.g. Admin/Clerical) or Other: \_\_\_\_\_

1. Mentors are responsible for closely supervising assigned minors to ensure that all standard safety practices as listed in USUHS' Safety Manual (6053-M) are observed in office and laboratory areas.
2. The minor is not authorized to handle human blood, body fluids or unfixed tissue.
3. If the minor plans to handle/use radioactive material, then the Radiation Safety Officer's (295-3390) concurrence must be obtained prior to any work. If approved by the RSO, then minors working in a posted radiological lab will need dosimetry and must receive Radiation Safety Lab Training. No minor is authorized to work with radioiodine.
4. If the minor plans to work with animals, then Animal Safety Training is required.

**All required training will be provided during the initial Minor's Orientation. See the EHS website for complete training schedules.**

5. The above captioned minor has received training applicable to the minor's anticipated occupational exposures: EHS Staff: \_\_\_\_\_ Date: \_\_\_\_\_
6. As a MENTOR, I fully understand that it is my sole responsibility to closely supervise the above named minor to ensure that all standard safety practices as listed in USUHS' Safety Manual (6053-M), including the additional limitations listed above, are observed in office and laboratory areas and that work involving the above stated occupational exposures will not occur until hazard specific training has been signature documented. I am also aware that I may be asked to produce this training documentation during routine EHS workspace inspections.

MENTOR signature: \_\_\_\_\_ Date: \_\_\_\_\_

**Please return this completed form to the Civilian Human Resources (CHR) Department. Copy retained by mentor.**

<sup>1</sup> Mentor= Principle Investigator, Department Chair, Director, Branch Chief, or equivalent