

Applies to: Faculty, staff, students, student employees, graduate associates, and volunteers working in youth activities and programs in the course of their university duties

Responsible Office

Civil Rights Compliance Office

POLICY

Issued: 01/01/2013

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The university is committed to providing the best experience possible for **youth** involved in **youth activities and programs**. Faculty, staff, students, student employees, graduate associates, and **volunteers** therefore are expected to hold themselves to the highest standards of conduct when interacting with youth. This policy establishes requirements for those in the university community who work in youth activities and programs, with the goal of safeguarding the wellbeing of youth.

Parents or guardians are to provide supervision over youth on **university property** unless they are involved in a youth activity or program.

In addition to the requirements of this policy, faculty, staff, students, student employees, graduate associates, and volunteers must adhere to obligations that may be imposed by applicable law, including but not limited to Ohio Revised Code Sections [2151.421](#) and [2921.22](#).

Purpose of the Policy

To promote the safety and welfare of youth who participate in youth activities and programs and outline what is required of faculty, staff, students, student employees, graduate associates, and volunteers who work in youth activities and programs, including their reporting obligations in instances of known or suspected incidents of **child abuse or neglect** of youth.

Definitions

Term	Definition
Care, custody, or control	When an adult(s) is present and has primary responsibility for supervision of youth at any given point throughout the youth activity or program. At least one adult must have care, custody, or control of youth at all times during the youth activity or program.
Child abuse or neglect	When a child has suffered or faces a substantial threat of suffering any physical or mental wound, injury, disability, or condition that reasonably indicates abuse or neglect, including any conduct of a sexual nature that may be harmful to a youth's mental, emotional, or physical welfare.
One-on-one interactions	An intentional or purposeful interaction when one individual to whom the policy applies is alone with one youth. This applies to both in-person and virtual interactions.
Program administrator	Any faculty, staff, students, student employees, graduate associates, and volunteers who have primary responsibility for meeting the requirements outlined in this policy. Typically, there is one program administrator per youth activity and program.
Program personnel	Any faculty, staff, students, student employees, graduate associates, and volunteers who work in a youth activity or program.
Unit	College or administrative unit.
University property	Any land, grounds, buildings, or facilities owned, leased, or used by The Ohio State University per formal contractual or legal agreements. Included are the Columbus campus, regional campuses, and other university property outside of Columbus. Location does not necessarily determine whether an activity or program falls within the definition of youth activities and programs.



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Term	Definition
Volunteer	Any individual working in an unpaid capacity in a youth activity or program, which may include interns or practicum students.
Youth	Any individual(s) under the age of 18 or any individual(s) under 21 years old incapable of self-care because of a mental or physical disability who is a participant in a youth activity or program. This does not include persons under the age of 18 while engaged as enrolled students for academic credit at Ohio State.
Youth activities and programs	An umbrella term that includes in-person, virtual, and hybrid youth activities and programs.
In-person youth activities and programs	Any: (1) event, operation, or endeavor operated, conducted, or organized by the university; (2) that includes youth; and (3) during which parents or guardians are not expected to be responsible for the care, custody, or control of the youth. Youth activities and programs that will be both in-person and virtual, will be considered in-person for the requirements set forth in this policy.
Virtual youth activities and programs	Any: (1) event, operation, or endeavor operated, conducted, or organized by the university; (2) that includes youth; and (3) is directed at youth and hosted by the university on an online platform. During such programs, at no time is OSU program personnel responsible for the care, custody, and control of the youth.
Hybrid youth activities and programs	Any: (1) event, operation, or endeavor operated, conducted, or organized by the university; (2) that includes youth; and (3) includes both in-person and virtual components. For purposes of this policy, hybrid youth activities and programs must meet the requirements of in-person youth activities and programs.

Policy Details

I. Scope

- A. Any faculty, staff, students, student employees, graduate associates, and volunteers who work with youth in youth activities and programs fall within the scope of this policy. Personnel who work in youth activities or programs, but not with the youth themselves, are not within the scope of this policy.
- B. Youth activities and programs within the scope of this policy include but are not limited to:
 1. Youth activities and programs the university operates on university property including but not limited to overnight camps, licensed childcare facilities, instructional programs, day camps, academic camps, and sports camps.
 2. Youth activities and programs the university operates that do not take place on university property, including but not limited to outreach and community service activities.
 3. **Virtual youth activities and programs** the university hosts on an online platform.
 4. **Hybrid youth activities and programs** that have both virtual and in-person components.
 5. Faculty or staff who bring a youth to university property as an intern, volunteer, or recruit outside of a structured youth activity or program (e.g., laboratory interns or athletic recruits).
- C. This policy does not apply to:
 1. University academic programs and activities which include persons under the age of 18 who are engaged as enrolled students for academic credit at Ohio State.
 2. Events on university property open to the general public that youth attend.
 3. Medical care given to youth in an in-patient, out-patient, or ambulatory setting in The Ohio State University Wexner Medical Center or other university patient-care setting.
 4. Institutional review board (IRB)-approved research.
 5. Student organizations operating, facilitating, or sponsoring youth activities and programs.
 6. Youth working for the university as employees.
 7. Youth activities and programs operated, conducted, or organized by non-university entities that take place on university property, including but not limited to facility rentals to third party organizations.



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8. Youth activities and programs granted a specific exemption from part or all of the policy in advance of the event taking place, after a written application has been reviewed and approved by the Youth Policy Governance Committee, as described in Procedure VII below.

II. Summary of Policy Requirements

- A. The following requirements are an overview only and are detailed in the Procedure section.
 1. All youth activities and programs must register annually with the Civil Rights Compliance Office (CRCO) on the [Youth Activities and Programs Registration webpage](#).
 2. Those working in youth activities and programs who witness child abuse or neglect or have information that would lead a reasonable person to believe a youth faces a substantial threat of such abuse or neglect, must follow specific reporting procedures.
 3. **Program personnel** must be background checked before working in youth activities and programs and regularly thereafter as outlined in section III of the Procedures.
 4. **Program administrators** must ensure that program personnel complete annual training administered or approved by CRCO.
 5. All program personnel must sign and agree to abide by the [Standards of Behavior for Employees/Volunteers](#) before working in youth activities and programs, and on an annual basis thereafter. These standards prohibit **one-on-one interactions** unless otherwise authorized in accordance with this policy.
 6. Youth activities and programs are subject to onsite or virtual visits conducted by CRCO.
 7. If an exemption from specific policy requirements is desired, an application must be submitted using the exemption process outlined in section VII of the Procedures.
 8. **Units** and individuals must cooperate with investigations when they occur.

PROCEDURE

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I. Registration

- A. Units operating youth activities and programs must register each activity or program with CRCO on the [Youth Activities and Programs Registration webpage](#).
 1. Registration for ongoing and pre-established youth activities and programs must be completed annually prior to the beginning of the university academic year.
 2. Registration for new youth activities and programs should be completed 60 days in advance when possible but must be completed before a youth activity or program begins.
 3. If a unit fails to register youth activities or programs, they will be subject to section VI of this policy, which could include cancellation of the youth activity or program.

II. Reporting

- A. Any program personnel who in the course of their duties witness child abuse or neglect or have information that would lead a reasonable person to believe a youth faces a substantial threat of child abuse or neglect must immediately take the following two steps to report:
 1. Alert the appropriate agency:
 - a. If a youth is in imminent danger (life threatening or abuse is being witnessed), call 911. If you are unsure whether there is imminent danger, call 911.
OR
 - b. If a youth is not in imminent danger, call Children Services Agency at 855-O-H-CHILD (855-642-4453), which is a 24-hour automated telephone directory that will link callers directly to a child welfare or law enforcement office in their county.



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2. Report to CRCO:

- a. Online – reporting form at civilrights.osu.edu,
- b. Call – 614-247-5838, or
- c. Email – civilrights@osu.edu

B. If consultation is needed regarding reporting, or if there are questions on the process or other support needed, contact the Director of Youth Protection at 614-247-5838.

III. Background Checks

- A. The requirements for background checks under this policy are separate and distinct from those addressed in the [Background Check 4.15 policy](#).
- B. Program administrators must ensure background checks are conducted on all program personnel as follows:
 1. **In-person youth activities or programs** and hybrid youth activities or programs: Any program personnel who is likely to have responsibility for the **care, custody, or control** of a youth as part of the youth activity or program must have an Ohio Bureau of Criminal Investigation (BCI) fingerprint background check completed before the youth activity or program begins.
 2. Virtual youth activity or programs: At least one program administrator or one member of the program personnel for the youth activity or program must have a BCI fingerprint background check completed before the youth activity or program begins. Such an individual must be present at all times during the activity or program.
 3. Program administrator(s) and personnel required to be background checked who have not lived in Ohio for five consecutive years must have both a BCI and a Federal Bureau of Investigation (FBI) check.
 4. A third-party vendor background check, including those required at the time of hire for university employees, is insufficient for individuals requiring a background check as described above.
 5. Program administrator(s) and personnel required to be background checked who have a break in service for less than 12 months must disclose any convictions that occurred during the break within three business days of commencement of participation in youth activities and programs. If a break in service is longer than 12 months, individuals required to be background checked must have a new background check, as required by sections 1 and 2 above, before working in youth activities and programs.
 6. A background check, as required by sections 1 and 2 above, must be completed every four years to remain eligible to work in youth activities and programs.
 7. Units have the option to require background checks on broader categories of individuals than those described in sections 1 and 2 above provided there is a business justification, that checks are made consistently across specific positions, and the documented background check program has been approved by the unit and coordinated with the [Office of Human Resources Background Check Services](#).
 8. Units must perform background checks on broader categories of individuals if required by law.
- C. Parental consent must be given for the background check in the case of an individual under the age of 18 requires a background check.
- D. See the [Background Check Resource Guide](#) for specific instructions on obtaining background checks.

IV. Training

- A. Program administrators must ensure that program personnel are trained annually, as follows, before they work in youth activities and programs.
 1. All program personnel who may exercise care, custody, or control of youth must complete the Youth Activities and Programs Policy training on BuckeyeLearn, or complete alternative equivalent training that is pre-approved by the Director of Youth Protection. If alternative equivalent training is desired, the program administrator must contact the Director of Youth Protection at least 30 days before any such alternative training would be administered.
 2. All program personnel who will not exercise care, custody, or control of youth must, at a minimum, review and sign the [Non-Care, Custody, and Control Responsibilities Training form](#).



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- B. If a unit is hosting a virtual youth activity or program, the person(s) responsible for establishing the program platform must have completed the Digital Accessibility Policy training on BuckeyeLearn and establish an accommodation process for virtual participants.
- C. Training content must include at minimum the following topics:
 - 1. Recognizing signs of physical, emotional, and sexual abuse, as well as neglect;
 - 2. Reporting suspected child abuse and neglect, including:
 - a. Who must report and what are the reporting requirements,
 - b. How, when, and where to report, and
 - c. Protection of good faith reporting;
 - 3. How to help prevent child abuse;
 - 4. The Standards of Behavior for Program Administrator(s) and Personnel;
 - 5. The [Youth Privacy Principles](#); and
 - 6. All requirements in this policy.

V. Standards of Behavior

- A. All program personnel are required to sign and abide by the [Standards of Behavior for Employees/Volunteers](#) or an alternative equivalent document that includes all components of the Standards of Behavior and is pre-approved by the Director of Youth Protection. If an alternative equivalent document is desired, the program administrator must contact the Director of Youth Protection at least 30 days before any such alternative document would be administered. The purpose of these standards is to promote the safety and wellbeing of all youth.
- B. Units must have all program personnel sign the [Standards of Behavior for Employees/Volunteers](#) (or a pre-approved alternative as described above) annually before they work in youth activities and programs.
- C. Program personnel must comply with the [Self-Disclosure of Criminal Convictions 4.17 policy](#), including its requirement that felony or misdemeanor convictions must be self-disclosed within three business days of pleading guilty or being convicted.
- D. One-on-one interactions are prohibited unless authorized as an exception to the policy by the Youth Governance Committee as outlined in Procedure VII.

VI. Accountability

- A. Individuals violating this policy will be held accountable for their actions. Such accountability may include but is not limited to:
 - 1. Volunteers are subject to reprimand or loss of volunteer status;
 - 2. Students are subject to the [Code of Student Conduct](#);
 - 3. Faculty, staff, student employees, and graduate associates are subject to corrective action, up to and including termination, in accordance with applicable university policies or rules.
- B. CRCO has oversight of the accountability as it relates to this policy and all CRCO policies. CRCO can refer matters to other university offices as appropriate.
- C. CRCO may deny or remove (pending appropriate corrective action) the ability of any individual covered under this policy to volunteer or work in youth activities and programs at any time. This action is to be applied in conjunction with other applicable university policies and rules.
- D. Investigations of allegations of child abuse or neglect will be conducted in accordance with the investigatory protocols of children service agencies, local law enforcement agencies, and/or the university.
- E. Onsite or virtual visits may be conducted by CRCO to promote compliance.
- F. Units and individuals must participate in onsite or virtual visits as required.
- G. Program administrators must provide copies of regulatory reports (e.g., Ohio Department of Job and Family Services inspection reports for childcare facilities) and other records at the request of CRCO.
- H. CRCO retains authority to cancel an activity or program for non-compliance with this policy.



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VII. Exemption Process

- A. If a program administrator deems that a section of this policy would place an undue hardship on a youth activity or program, an exemption can be requested by submitting a [Departmental Request for Exemption form](#).
- B. Absent extenuating circumstances, a [Departmental Request for Exemption form](#) must be submitted to the Director of Youth Protection no later than eight weeks prior to the event taking place and will be reviewed by the Youth Policy Governance Committee. The Director of Youth Protection will make every effort to communicate approval or denial at least four weeks prior to the event. If an expedited process is required because of an extenuating circumstance, contact the Director of Youth Protection immediately.

Responsibilities

Position or Office	Responsibilities
Civil Rights Compliance Office (CRCO)	<ol style="list-style-type: none"> 1. Conduct onsite or virtual visits of youth activities and programs. 2. Retain authority to cancel an activity or program for non-compliance with this policy. 3. Retain authority to deny or remove the ability of any individual to volunteer or work in youth activities and programs as set forth in the policy.
Director of Youth Protection	<ol style="list-style-type: none"> 1. Pre-approve, when requested by program personnel, any alternative training equivalent to the Youth Activities and Programs Policy training. 2. Pre-approve any alternative document to the Standards of Behavior for Employees/Volunteers required of program personnel as set forth in the policy. 3. Make every effort to communicate approval or denial of an exception request at least four weeks prior to a youth activity or program taking place.
Office of Human Resources	Coordinate broader background checks, as requested by units, that meet the criteria set forth in the policy.
Parents or guardians	Provide supervision over youth on university property unless they are involved in a youth activity or program
Program administrators	<ol style="list-style-type: none"> 1. Ensure background checks are conducted on all program personnel as set forth in the policy. 2. Ensure that program personnel complete required annual training as set forth in the policy. 3. Complete specific background checks as set forth in the policy. 4. Provide copies of regulatory reports and other records at the request of CRCO. 5. Submit a Departmental Request for Exemption form, as necessary. 6. Participate in onsite or virtual visits as required.
Program personnel	<ol style="list-style-type: none"> 1. Immediately report suspected child abuse or neglect as set forth in the policy. 2. Complete required background checks as set forth in the policy. 3. Complete annual training administered or approved by CRCO as set forth in the policy. 4. Exercise care, custody, and control of youth as required in the policy. 5. Sign and agree to abide by the Standards of Behavior for Employees/Volunteers. 6. Sign and abide by the Standards of Behavior for Employees/Volunteers or an alternative equivalent document that includes all components of the Standards of Behavior and is pre-approved by the Director of Youth Protection. 7. Participate in onsite or virtual visits as required.
Youth Policy Governance Committee	<ol style="list-style-type: none"> 1. Review exemption requests as set forth in the policy. 2. Authorize any exceptions for one-on-one interactions.
Units	<ol style="list-style-type: none"> 1. Cooperate with investigations when they occur. 2. Register each youth activity or program as set forth in the policy. 3. Perform background checks on broader categories of individuals if required by law or as otherwise set forth in the policy. 4. Have all program personnel sign the Standards of Behavior for Employees/Volunteers (or a pre-approved alternative as described above) annually as set forth in the policy. 5. Participate in onsite or virtual visits as required.



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Resources

Governance Documents and Forms

Background Check policy 4.15, hr.osu.edu/public/documents/policy/policy415.pdf
 Code of Student Conduct, trustees.osu.edu/bylaws-and-rules/code
 Departmental Request for Exemption form, go.osu.edu/exemptionreqform
 Faculty Rule 3335-5-04, trustees.osu.edu/bylaws-and-rules/3335-5
 Frequently Asked Questions, go.osu.edu/trainingdocumentationform
 ORC 2151.421, Reporting child abuse or neglect, codes.ohio.gov/ohio-revised-code/section-2151.421
 ORC 2921.22, Failure to report a crime or knowledge of a death or burn injury, codes.ohio.gov/ohio-revised-code/section-2921.22
 Required Components Flowchart, go.osu.edu/reqcomponentsflowchart
 Self-Disclosure of Criminal Convictions policy 4.17, hr.osu.edu/public/documents/policy/policy417.pdf
 Standards of Behavior for Employees/Volunteers, go.osu.edu/standardsbehavior
 Statement of Nonconviction form, go.osu.edu/nonconvictionstatement
 Some programs are required by Ohio Department of Job and Family Services to use this form.
 University General Records Retention Schedule, go.osu.edu/retention-schedules
 Whistleblower policy 1.40, hr.osu.edu/public/documents/policy/policy140.pdf
 Youth Activities and Programs Background Check Resource Guide, go.osu.edu/backgroundcheckguide
 Youth Activities and Programs Registration webpage, youthprograms.osu.edu
 Youth Privacy Principles, it.osu.edu/privacy/youth-privacy-principles

Reporting Resources

Abuse & Neglect Reporting Guide, go.osu.edu/abuserreportguide

Training Materials and Resources

Training modules
 BuckeyeLearn - Accessing Youth Activities and Programs Policy Training, go.osu.edu/accessyouthpolicytraining
 BuckeyeLearn - Disable Pop-Up Blocker, ap.osu.edu/sites/default/files/bl_disable-popups.pdf
 Non-Care, Custody, and Control Responsibilities Training form, go.osu.edu/nonccctraining

Contacts

Subject	Office	Telephone	E-mail/URL
Policy questions	Director of Youth Protection, Civil Rights Compliance Office	614-292-1404	youthpolicy@osu.edu
Background checks	HR Connection	614-247-myHR (6947)	hr-backgroundchecks@osu.edu hr.osu.edu/services/background-checks
Emergencies	The Ohio State University Police Division, Department of Public Safety	911	dps.osu.edu
Legal issues, mandatory reporter requirements	Office of Legal Affairs	614-292-0611	legal.osu.edu
Reporting	The Ohio State University Police Division, Department of Public Safety	614-292-2121	dps.osu.edu
Statement of Nonconviction form	Ohio Department of Job and Family Services	866-886-3537	jfs.ohio.gov



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History

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Edited:	03/20/2019	
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Interim Revised:	05/12/2020	
Revised:	01/25/2022	Renamed Youth Activities and Programs
Edited:	12/12/2024	
Edited:	04/21/2025	Replaced “Office of Institutional Equity” with “Civil Rights Compliance Office” to reflect office name change