

Purpose

The purpose of this policy is to provide requirements for Minors (individuals under the age of 18) working or participating in, or with the intent to work or participate in, a University of Arizona (“University”) research laboratory or facility (not including remote work).

Scope

This policy applies to all University research facilities and laboratory spaces where Minors are working or participating as visitors, volunteers, employees, interns, individuals participating in “shadowing” or other outreach programs, and/or contractors.

Contact/Department

Environmental Health & Safety (EHS)

ehs.arizona.edu

ehs-help@arizona.edu

520-626-6850

Minors Under the Age of 13

Minors under the age of 13 may not be present in a laboratory or within other research areas unless they are touring or visiting a laboratory pursuant to the requirements below (“Touring/Visiting a Lab”).

Minors Between the Ages of 13 and 17

Any Minor working and/or participating in an activity in a lab or research setting must have a University NetID.

Approved Conditions

Touring/Visiting a Lab: Minors may enter University laboratories or other research facilities as part of a Principal Investigator (“PI”)- or Center-authorized and supervised tour/visit. The PI or primary supervisor of the laboratory will be responsible for proper supervision and for providing appropriate safety measures and all personal protective equipment for visitors. 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 while on the premises and may not participate in any laboratory activities.

Enrolled Minors: Minors ages 13-17 are permitted in a laboratory or other research setting when they are participating in an academic program (including internships as part of a University academic program), provided that:

- They follow requirements for enrolled minors set by any relevant units at the University.
- They have received general safety training through the University, which has been documented through EDGE Learning.
- They have been trained in the specific hazards to which they may be exposed in the laboratory or research facility, and they agree to strictly adhere to the laboratory-specific requirements concerning Personal Protective Equipment (“PPE”)
- They are always under the direct supervision of a qualified adult designated for this responsibility.

Non-Enrolled Minors: Minors, aged 16 or older, are permitted to work or participate in University laboratories or research facilities as a non-enrolled minor only if:

- They have received general lab safety training and been trained in the specific hazards to which they may be exposed by the PI or supervisor and that training has been recorded.
- They agree to strictly adhere to the laboratory-specific requirements concerning PPE.

- They are at all times under the direct supervision of a qualified adult designated for this responsibility.
- As applicable, all paperwork and requirements set by the Office of Youth Protection have been met.

Requirements

Supervision Required: Minors may not, under any circumstances, be alone in a University lab or research facility, even if they are only conducting computational work. The PI or primary supervisor (or designated alternate) must closely supervise the Minor (i.e., work with or near them in the laboratory).

Time and Activity Restrictions: The University will comply with all state and federal child labor laws for all Minors working or participating in University research.

Hazardous Materials and Agents

- **Lasers:** Minors are permitted in labs or research facilities with lasers but may not work with Class 3b or 4 lasers that require registration with the Laser Safety Officer (LSO).
- **Ionizing Radiation:** Minors under the age of 17 may not work with any radioactive materials. They may be permitted to work in areas with radiation provided they obtain Radiation Safety Officer (RSO) approval, stating there is minimal risk of exposure from working in the same space.
- **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 (BL2) or Biosafety Level (BL3) pathogens
 - Primary human and non-human primate materials
 - Biological Select Agents or Toxins
 - Risk Group 2 recombinant materials and viral vectors
- **Chemicals:** Minors may not access, handle, or work with highly hazardous materials, including:
 - Pyrophorics,
 - Explosives,
 - Large quantities of flammable materials (>500 mL),
 - Refractory ceramics and silica,
 - Anhydrous ammonia,
 - Agricultural chemicals, and

- Compounds having a “particularly hazardous” definition (acutely toxic, carcinogenic, or a developmental and/or reproductive toxin per OSHA definition).

This includes packaging and shipping as well as cleaning up spills of such materials.

- **Controlled Substances:** Minors may not have unsupervised access to, handle, or otherwise use controlled substances, even if they are enrolled students. Controlled substances are narcotic and non-narcotic substances that are regulated under the [federal Controlled Substance Act](#).
- **Animals:** Minors may not access, handle or work with or in close proximity to vertebrate laboratory animals without the approval of an Institutional Animal Care and Use Committee (“IACUC”).
 - Non-Live Animal Carcasses/Tissues (fixed or unfixed)
 - Minors may work with non-live animals or tissues from sacrificed animals with the appropriate supervision and so long as fixatives or other chemicals do not violate the above requirements. Minors using these tissues do not need to be added to an Institutional Animal Care and Use Committee (IACUC) protocol.
 - Live Animals
 - University Program:
 - Minors may work with live animals as approved by the Program and IACUC, with the requirement that they receive the appropriate animal handling and safety training and are always supervised by an approved and trained PI or lab member. Minors may NOT work with controlled substances, as per the above statements, in their work with animals.
 - Research:
 - <14 days of work:
 - Minors may work with live animals for limited periods of time (<14 days total) with the requirement that they receive the appropriate animal handling and safety training and are always supervised by an approved and trained PI or lab member. Minors may NOT work with controlled substances, as per the above statements, in their work with animals.
 - ≥14 days of work:
 - Minors may work with live animals as approved by the IACUC with the requirement that they are added to the IACUC protocol, receive the appropriate animal handling and safety training, and are always

supervised by an approved and trained PI or lab member. Minors may NOT work with controlled substances, as per the above statements, in their work with animals.

- **Physical Hazards:** Under Arizona law (A.R.S. § 23-230), minors may not engage in work involving major physical hazards. Examples of equipment presenting major physical hazards include: lathes, electric saws, high powered tools, electrical hazards, farm equipment, powered industrial trucks, manlifts, etc.

Exceptions

Since the nature of research is highly variable, this policy provides for limited exceptions to these requirements based upon review and written approval by the appropriate authorities (safety, committees, etc.). In considering whether an exception to this policy is warranted, requestors must send a request to EHS, who will then involve other groups as needed, including but not limited to the Office of Youth Protection and the Office of General Counsel (OGC). Relevant information to consider includes: the specific research environment; the Minor's previous lab course work and/or related experience; the safety training the Minor will receive; the ability of the researcher(s) to provide close supervision; and the purpose of the proposed experience. No exceptions will be made that would violate any state or federal law related to this policy.

References

<https://www.azica.gov/labor-youth-employment-hours-restrictions>

<https://www.azica.gov/labor-youth-employment-occupational-restrictions>

A.R.S. § 23-230

Arizona State Requirements for Minors

Time Restrictions

A.R.S. 23-233 restricts the hours that youths under the age of sixteen (16) can work.

No one under the age of sixteen (16) can work more than three (3) hours on a school day when enrolled in school on a day when school is in session, eight (8) hours on a non-school day for a total of eighteen (18) hours per week.

No one under the age of sixteen (16) can work before 6:00 a.m. or after 9:30 p.m. when there is school the next day. When there is no school the next day they can work until 11:00 p.m.

When school is not in session or when the person is not enrolled in school they can work eight (8) hours per day for a total of forty (40) hours per week. They can not work before 6:00 a.m. or after 11:00 p.m. when school is not in session or when the person is not enrolled in school.

Youths under the age of sixteen (16) can not be employed in solicitation sales or door-to-door solicitation after 7:00 p.m.

Please Note: The Federal Child Labor Laws restrict anyone under 16 years of age from working past 7:00 p.m. during the school year and 9:00 p.m. during the summer months. They also can not work before 7:00 a.m. year round. Contact the Federal Wage and Hour Division for more information.

Activity Restrictions

17 And Under:

Under Arizona's Youth Employment Law and the Federal Child Labor Law, employers are under the jurisdiction of federal and state agencies. In those cases of dual jurisdiction the more restrictive requirement would apply. If an employer is exempted by either the state or federal law, the nonexempted law would apply.

- Occupations in the manufacturing or storing of explosives.
- Occupations as a motor vehicle driver or outside helper. Under the State Law, 16 and 17 year old minors can drive if the total driving time does not exceed

two hours per day or 25% of their work day. They also can not drive fifty or more miles per day.

The Federal Child Labor Law prohibits 16 and 17 year olds from driving on the job. Contact the Federal Wage and Hour Division for more information

- Mine and quarry occupations.
- Logging occupations including, but not limited to occupations in connection with mills.
- Operation of power-driven woodworking machines.
- Occupations with exposure to radioactive substances and to ionizing radiation.
- Operation or the assistance in the operation of a power-driven hoist or an elevator, including, but not limited to forklifts, cranes or derricks.
- Operation of power-driven metal working, forming, punching or shearing machines.
- Occupations involving slaughtering, meat packing, processing or rendering of meat, including operation, set-up, repair, adjustment, oiling or cleaning of a power-driven meat processing machine.
- Occupations involving the operation or cleaning of power-driven bakery machinery.
- The Federal Child Labor Laws restrict youths under the age of eighteen (18) from the machinery listed in this category.
- Occupations involving the operation of power-driven paper products machines, including, but not limited to presses, arm-type wirestitchers or staplers, guillotine paper cutters or shears, and scrap paper balers.
- Occupations involving the manufacture of clay construction products or silica refractory products.
- Occupations involving the operation and cleaning of power-driven saws.
- Occupations involving wrecking, demolition and shipbreaking operations, including, but not limited to demolishing or dismantling buildings, bridges, motor vehicles or other structures.
- Occupations involving roofing operations or equipment attached to or replaced on roofs.
- Occupations involving excavation or tunnel operations.

15 And Under:

- Occupations involving manufacturing.
- Occupations involving processing, including, but not limited to filleting fish, dressing poultry or cracking nuts.
- Occupations involving laundering or dry cleaning in a commercial laundry.
- Occupations involving warehousing, including, but not limited to moving items to and from trucks, railroad cars, conveyors and buildings.

- Occupations involving construction.
- Occupations involving boilers, furnaces or engine rooms.
- Occupations involving window washing, work from a ladder, scaffold, window sill or similar structure or place more than five feet in height.
- Work involving maintenance or repair of the establishment's machines or equipment, including, but not limited to work involving the inflation of tires mounted on rims equipped with a movable retaining ring.
- Work involving cooking and baking, including frying and broiling.
- Work involving the operation, setting up, adjusting, cleaning, oiling or repairing power-driven food slicers, grinders, choppers and cutters.
- Work involving the preparation of meats for sale.
- Operating a tractor over twenty power take off horsepower.
- Connecting or disconnecting implements from or on to a tractor.
- Operating farm machinery, including, but not limited to operating corn pickers, cotton pickers, grain combines, hay mowers, forage harvesters, hay balers, potato harvesters, mobile pea viners, feed grinders, crop dryers, forage blowers, auger conveyors or self-unloading wagons, power post hole diggers, power-driven non-walking rotary type tillers, trenchers or earthmoving equipment, potato combines.
In this subdivision "operating" means starting, stopping, adjusting, feeding or any other activity regarding physical conduct associated with such machines and machinery.
- Working in a pen occupied by a bull, boar or stud horse maintained for breeding purposes, a sow with young pigs or a cow with a newborn calf.
- Felling, bucking, skidding or unloading timber with butt more than six inches in diameter.
- Picking or pruning from a ladder over eight feet in height.
- Riding on a tractor as a helper or driving a bus, truck or automobile.
- Working inside a fruit storage area or grain storage area designed to retain an oxygen deficient or toxic atmosphere, an upright silo, a manure pit or operating a tractor for packing purposes in a horizontal silo.
- Handling hazardous agricultural chemicals.
- Handling explosives.
- Transporting, transferring or applying anhydrous ammonia.