

Community Comments and Responses Regarding a Draft Administrative Policy

Policy on Protecting Minors (02.118.1)

This draft policy was posted for community comments from October 15-29, 2025. Below are the comments submitted, together with responses that may be provided in whole or in part by the policy owner, the Administrative Policy Committee (APC), and/or policy development staff. This policy was approved February 17, 2026, and became effective March 1, 2026.

Comment #	Respondent's Capacity	Community Comment	Response
1	Staff	<p>If a Housing staff member is assisting a visiting group with making bedroom assignments, and that group has minors, is the Housing staff member considered an Activity Organizer or Activity Staff (and as a result, required to pass an annual nationwide criminal background check, complete annual training regarding policies and issues relating to interactions with Minors, and complete the annual Working with Minors Behavioral Expectations Acknowledgement)?</p> <p>What information is an Activity Organizer expected to share with Housing in its roster of minors (e.g., name, bedroom assignment, contact info)?</p> <p>Is a minor allowed to sleep in a separate bedroom in the same suite/apartment as an adult who is not their parent/legal guardian (e.g., in a suite of five single bedrooms that has a shared, single-use bathroom and shared community room, can a minor be in one bedroom and a non-parent/non-legal guardian be in another bedroom)?</p> <p>Is a minor with their parent/legal guardian allowed to sleep in the same room/suite/apartment as another minor with their own parent/legal guardian?</p>	<p>Housing staff assisting with room assignments would not be considered an Activity Organizer. The Activity Organizer is the lead responsible party for the Covered Activity. Housing staff would only be considered Activity Staff if assigned to directly supervise participating Minors. Where Activity Organizers have planned and arranged for sufficient personnel to maintain adequate supervision and safety in accordance with this policy, or in the absence of specific arrangements to the contrary, it is considered likely that on-site Housing staff would most commonly be classified as ancillary support personnel.</p> <p>Details regarding what information to include with the required housing rosters will be specified in the policy's accompanying procedures.</p> <p>More information would be needed to make a determination regarding compliant arrangements for multiple bedrooms in a suite. As stated in the draft policy, separate bathrooms and showers must be provided for adults and Minors when feasible, or else reasonable alternate efforts made to provide separation.</p> <p>During such time that a Minor is accompanied by their own parent/legal guardian, that Minor is considered to be under the care, supervision and control of their parent/legal guardian.</p>

2	Staff	<p>I currently host upwards of 10 programs for minors each calendar year ranging from 10 participants to 100 that are generally 3 hours in length. Many of these are unable to be planned more than 30 days in advance due to the calendars and budgets of K-12 institutions and other community organizations. They are always planned at least 2 weeks (14 days) in advance.</p> <p>It is unreasonable to expect all student staff and volunteers to be background checked unless this service is provided directly by the University at no cost to the student or the supporting department. Additionally, we do require a risk form and the schools themselves require permission slips, however the other suggested documents are unnecessary for our type of program and would only put a burden on parents and school administrators. It is already difficult to get the forms we currently need. Some of these make sense for overnight and camp programs but for programs that happen for 3 hours in which students are in the woods and not directly on campus and are both dropped off and picked up by bus, this does not fit.</p> <p>Additionally, we already have a rigorous training program for local and standard operating procedures, safety, and minimizing risk. Our chaperones handle any student specific issues on the day of their program according to school policies. Any addition to this training program would minimize the number of volunteers and directly inhibit our ability to offer these programs. Additionally, it seems a bit unreasonable for a potential student and their parent to need to complete all of these forms simply for a 1.5 hour tour in which many of these forms simply do not apply. I can absolutely understand requiring a risk form for tours, protecting both the university and student staff providing the tour.</p>	<p>It is considered foundational to the safety of participating Minors for Activity Organizers and Activity Staff to have criminal background checks completed prior to a Covered Activity.</p> <p>The draft policy was subsequently revised to provide streamlined compliance for qualified K-12 School-Supervised Covered Activities.</p> <p>Staff from the Office of Risk Control and Insurance are available to meet with Activity Organizers to discuss requirements.</p>
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