



CSUSM Managing Risk in Youth Programs

Resource Guide

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Background

Introduction

California State University San Marcos (CSUSM) strives to promote a culture of care and an environment where all members of the campus community can thrive. CSUSM makes every effort to offer a safe and enjoyable educational environment for youth and has a wide range of activities that include persons under the age of 18 as participants or attendees. These activities may include camps, clinics, workshops, recitals, tournaments, conferences, and competitions, and CSUSM is committed to protecting youth who participate in such activities. CSUSM has zero tolerance for the abuse or mistreatment of youth.

Authority

[CSU Youth Protection Policy](#) is the primary and controlling systemwide authority governing the protection of minors participating in programs, activities, or events conducted, sponsored, or supported by the CSU. The policy establishes mandatory requirements, assigns responsibilities, and sets minimum standards applicable to all CSU campuses, auxiliary organizations, employees, volunteers, students, and third parties.

In addition, the [Managing Risk in Youth Programs Resource Guide CO](#), issued by the CSU Chancellor's Office, serves as a governing document that provides systemwide risk management guidance related to youth programs and activities. Together, the CSU Youth Protection Policy and the Managing Risk in Youth Programs Resource Guide CO establish the authoritative framework for youth protection and risk mitigation within the CSU system.

This guide, CSUSM Managing Risk in Youth Protection, is intended to support and operationalize these governing documents. This guide provides campus-specific guidance, tools, and implementation support to assist CSUSM programs and personnel in understanding and applying CSU system requirements in a consistent and compliant manner. It is designed to facilitate effective implementation of both the CSU Youth Protection Policy and the Managing Risk in Youth Programs Resource Guide at the campus level.

Definitions

Authorized Person: an individual, 18 years or older, paid or unpaid, who interacts with, supervises, chaperones or oversees youth in an activity or program.

- An Authorized Person is considered to have high contact with youth if they:
 - are involved with the care, supervision, guidance, or control of youth; or
 - have routine interaction with youth; or
 - work with or around youth on more than one program; or

- work with or around youth on a program that meets regularly or involves multiple interactions; or
 - have the potential for unsupervised access with one youth; or
 - are responsible for supervising youth; or
 - are a consistent and regular volunteer for programs involving youth; or
 - interact with youth on a frequent basis.
- An Authorized Person is considered to have low access with youth if they:
 - work with or around youth for a one-time program (but not programs that meet regularly or involve multiple interactions);
 - are always supervised by another adult when interacting with youth; or
 - are not responsible for supervising youth.

Background check: Background checks are to be conducted in accordance with CSU Technical Letter HR 2017-17.

Care, Custody and Control: When an individual has primary responsibility for supervision of a youth at any given point throughout the activity or youth program.

Direct Contact: Any employee or volunteer who interacts with youth and is responsible for the care, safety and security of a minor.

High Contact Personnel: Any employee or volunteer who has routine or frequent interaction and supervision of minors. This would mean the employee or volunteer is supervising minors beyond one-time (day/week) programming, as part of their expected duties, and that the department would be considered youth-serving.

Low contact: work with or around youth for a one-time program and are not responsible for supervision of any minor.

Program Sponsor: The Program Sponsor is the appropriate University administrator. e.g., Dean, Associate Vice President, Assistant Vice President, Director, Assistant Director, Auxiliary Executive Director or Third Party responsible for authorizing the program and ensuring the program follows the criteria set forth in these guidelines. The Program Sponsor is required to be an Administrator/MPP or Faculty member. The Program Sponsor will be identified as a central contact for Program information. A Program Sponsor must be pre-designated for any program.

A Program Sponsor can delegate the management of certain components of a Youth Activity to a Program Director. The delegation is limited to the general oversight, day-to-day planning, coordination, and implementation of the Program and its essential components and does not alleviate the Program Sponsor from ultimate responsibility for applying these guidelines to their program.

Program Director: e.g., Faculty, Director, who provides general oversight of the program and manages day-to-day planning, coordination, and implementation of the program and its essential

components, if so, delegated by the Program Sponsor. The Program Director will be identified as a central contact for Program information.

Regular Contact Volunteers: "18 years of age or older and who has direct contact with, or supervision of, children for more than 16 hours per month or 32 hours per year" as defined by AB 506.

Residential Program - youth program where minors stay overnight in campus housing or housing coordinated by campus.

Third Party or Co-sponsored Programs: any off-campus person or entity contracted to utilize CSUSM resources/facilities to operate a program/youth activity, with no direct affiliation with the University. A Co-sponsored program is an activity or program undertaken, engaged in or conducted jointly between the University and a Third Party.

University Facilities: Facilities owned by, leased to, or under the direct control and supervision of the University or any of its Auxiliaries.

Youth/Minor: The term "youth", utilized throughout these guidelines, represents any person under 18 years of age who is not a matriculated student.

Youth Program/Youth Activity: An activity or event conducted or organized by the University, Auxiliary or Third Party that includes youth during which the University, Auxiliary or Third Party assumes the responsibility for the care, custody and control of youth participants. "Youth Program or Youth Activity" does not include (1) activities or events which parents, guardians are responsible for the care, custody, and control of youth participants, or (2) events open to the general public (e.g., intercollegiate athletic events, concerts, class tours).

Youth Program Office – Integrated Risk Management is the CSUSM department responsible for reviewing risk associated with youth programming in University or Auxiliary sponsored programs and activities.

Operational Guidelines

Program Registration

Registration for Youth Programs and Youth Activities should be submitted to Integrated Risk Management **at least 60 days before** the start of each inaugural event or activity. For any reoccurring youth program, registration should be **minimum 30 days prior**. This will allow enough time for the Program Sponsor/Director to coordinate and complete all the necessary elements required for directly supervising minors.

[Youth Protection Program Registration](#) requests the following information and more:

1. Pre-approval by Program Sponsor/appropriate administrator(s)
 - a. Program Sponsor's name
 - b. Program Director's name

- c. Department name
- d. Youth Program/Activity
 - i. Description
 - ii. Date/Time
 - iii. Number of overnights (if applicable)
 - iv. Anticipated number of participants
 - v. Anticipated age of participants
- e. Funding source

Program Elements

Program Elements apply to any University sponsored program when the youth is in the direct care, custody, and control of any University staff, faculty, or volunteers. Program Directors should adhere to the following criteria when conducting youth programs:

1. Obtain all program registration, media, medical, liability releases, and Parent and Participant Handbook as a part of the program registration process. All data gathered shall be confidential, subject to retention guidelines, and shall not be disclosed, except as provided by law.
 - a. Provide Program Registration, if applicable
 - b. Utilize a medical treatment authorization form for all youth participants.
 - c. Utilize a photo, media/image release form.
 - d. Utilize the General Release of Liability (includes Promise not to Sue, Assumption of Risk, and Agreement to Pay Claims)
 - e. Provide Parent and Participant Handbook (signed acknowledgement)
 - f. Utilize transportation of minor authorization form, if applicable.
 - g. Utilize Sign In/Sign Out form – only for youth programs with participants over 14 years of age

Note: All template forms referenced above may be found in the following linked [Youth Protection: Program Checklist](#)

*Documents are retained by the Department and must be reserved for a minimum of three years or until the minor turns 21 years old, whichever is longer.

2. Provide appropriate levels of supervision for youth during the program. In determining the appropriate level of supervision, the program will consider the number, age, and gender of participants, the activities involved, and the supervision standards for residential and non-residential programs provided by the American Camp Association (ACA).
 - a. Ratios for various age groups should be calculated to create a safe and effective learning environment. Two Authorized Persons must be present throughout the program, regardless of total count and accepted ratios may include:
 - i. 5 years and younger: One Authorized Person for every 6 youth participants with a minimum of two Authorized Persons. No overnight youth participants permitted.

- ii. 6-8 years: Minimum of two Authorized Persons with 1:6 ratio for “overnight youth participants” and 1:8 ratio for “day youth participants.”
 - iii. 9-14 years: Minimum of two Authorized Persons with 1:8 ratio for “overnight youth participants” and 1:10 ratio for “day youth participants.”
 - iv. 15-18 years: Minimum of two Authorized Persons with 1:10 ratio for “overnight youth participants” and 1:12 ratio for “day youth participants.”
 - b. At times, ratios may be adjusted in consultation with IRM. Only IRM has the authority to change ratios after considering factors such as type of program, age, duration, and frequency.
 - c. Authorized Person: minor ratios are not required when a program requires or reasonably anticipates that youth participants will be accompanied by a legal guardian or a legal guardian’s authorized appointee
 - d. Low contact individuals (faculty, staff, students, volunteers) may not be considered as an Authorized Person, and may not be responsible for the safety and care of youth. Low contact individuals cannot be one-on-one with a minor, and are not considered part of the authorized person: minor ratio.
3. Participant Accident Insurance may be secured through IRM for the campus or auxiliary-sponsored youth program. Initial program registration will be sufficient information for IRM to bind coverage. If there are any changes to the program, please notify IRM.
 4. When the program involves residential (overnight) stays, youth must be assigned sleeping spaces separately from Authorized Persons by at least one lockable door.
 - a. Exception: a youth may be housed in the same room as the youth's parent/guardian.
 - b. Adults over 18 will not be assigned to shared sleeping spaces in on-campus apartments or residence hall rooms unless they are the parent legal guardian/ or sibling of the youth.
 - c. IRM may conduct additional training for Authorized Persons when programs include overnight stays in residential campus housing.
 - d. It is highly encouraged that the Program Director provide University Police Dispatch, dispatch@csusm.edu, and cc risk@csusm.edu, a participant and staff list including information regarding youth program, dates and duration of program, number of participants, emergency contact name and phone number, and room assignments.
 - e. All residential programs must coordinate housing with CSUSM Corporation and follow their requirements.
 5. Program Directors shall provide an in-person or virtual age-appropriate orientation to participants at the start of the program that addresses the following topics:
 - a. Program safety and security procedures
 - b. University rules, program rules, and behavioral expectations
 - c. University reporting protocols for suspected child abuse and sexual assault (age appropriate)
 - d. University Nondiscrimination expectations (age-appropriate)

6. Program Sponsor or designee is encouraged to conduct a program review and approval 30 days in advance which should include the following:
 - a. Confirmation of interview screening for staff and volunteers, if applicable
 - b. Confirmation of completed and reviewed livescan and national sex offender registry check
 - c. List of staff and volunteers
 - d. Confirmation of completed training for staff and volunteers.
 - i. Mandated reporter acknowledgement (online training is highly encouraged)
 - ii. LearnerWeb Praesidium online Youth Protection courses
 - iii. Expected behavior for working with children
 1. Provide Staff and Volunteer Handbook and retain "Signed Acknowledgement" on the last page
 - e. Confirmation of completed or scheduled orientation for participants
 - f. Confirmation of provision of Participant and Parent Handbook which includes code of conduct
 - g. List of participants
 - h. Confirmation of collection and repository of appropriate forms/documents
7. In the event of a medical emergency, contact local emergency medical services.
8. Facility rentals and non-university/third party and cosponsored programs occurring on campus should include standardized written documents that hold the university harmless and requirement for screening and working with youth. Please refer to the Third-Party and Co-Sponsored Program section in this resource guide, pages 14-15.

Screening and Selection

All programs must adhere to the screening and selection criteria required by the University. All steps must be completed before an Authorized Adult is released to work with youth in a paid or unpaid position.

Authorized Person with High Access to Youth (regular or direct contact)

Screening and selection of individuals who have high access to youth will include the following:

1. A multi-state criminal background check (Livescan) that includes county-level information
2. Mandated reporter
3. A national sex offender registry check
4. Required online Youth Protection Trainings via LearnerWeb
5. Signed Acknowledgement found on last page of Staff and Volunteer Handbook

High Contact Personnel or Regular Volunteers:

In addition to authorized person screening requirements, Program Directors must complete:

6. Items 1-5 listed above
7. A standard application designed to screen for abuse

8. Face-to-face interviews using behaviorally-based, standardized questions designed to assess for potential risk to abuse.
9. A minimum of three references, at least one of which is personal, are to be asked behaviorally-based questions that assess abuse risk.

Low contact individual to minor (not responsible for care and safety of minor, one-time service, non-supervisory role, no one-on-one interaction with minor)

Individuals who have low access to youth:

1. May go through formal volunteer process with applicable Human Resources department
2. Must be supervised by Program Director or designee
3. Supports the program operationally or provides program content (e.g. faculty lecture, athletic equipment set up)
4. Never is one on one with any minor
5. Not a part of authorized person: minor ratio

Live Scan (Fingerprinting)

Live Scan will be conducted as required in CSU Background Checks policy, Technical Letter HR 2017-17. All positions with regular or direct contact with a minor will submit to a mandatory Live Scan before the Program begins.

No individual shall be permitted to participate in direct contact with youth participants or have a defined role or responsibility where youth participants' personal identification information is conveyed, if said individual does not have a verified, clean criminal background check.

All Program employees, including Program Sponsors or Directors who are considered employees, will comply with CSU policies regarding background checks.

All staff, faculty, and volunteers will be screened against the National Sex Offender Registry. Records will be maintained by the applicable Human Resource office.

As part of the agreement to operate on CSU property or under the CSU name, third-party entities are responsible for ensuring that the appropriate youth protection requirements are completed for its employees and volunteers prior to direct supervision of minors.

Mandated Reporter & National Sex Offender Registry

Section E. in the CSU Youth Protection Policy highlights Mandatory Reporting Requirements governed by CSU Mandatory Reporting of Child Abuse and Neglect Policy, state law reporting requirements, and CSU Background Checks Policy, Technical Letter Human Resources 2017-17. Authorized Persons who are responsible for the care, custody, and supervision or control of minors are mandatory reporters under state law and will be checked against the national sex offender registry.

Program Handbook for Parents and Participants

Departments sponsoring a youth program will develop and distribute a program handbook to participants and their parents/legal guardians. **Integrated Risk Management has developed a template handbook which contains the information below.** The program handbook should include the following information:

1. Program pick up and drop off location and check in/check out.
2. Procedures for notifying a youth's parent/legal guardian in case of emergency, including medical or behavioral situations.
3. Information for parents/legal guardians on how to contact the participant during the program.
4. Program rules and conduct expectations for participants in the program, including the statement that participants must abide by all CSUSM program rules and may be removed from the program for failure to do so. Program rules and expectations must include the following:
 - Prohibition against the possession or use of alcohol, tobacco, drugs, fireworks, guns, and other weapons.
 - Rules about when participants may leave campus during the program.
 - Clear statement that no violence of any kind will be tolerated.
 - Clear statement that no theft of property, regardless of owner, will be tolerated.
 - Clear statement that sexual harassment, sexual abuse, and other sexually inappropriate conduct will not be tolerated.
 - Clear statement that any violation of the Interim CSU Nondiscrimination Policy will not be tolerated.
 - Clear statement that hazing and bullying (physical, verbal, or cyber-bullying) will not be tolerated.
 - Clear statement that misuse or damage of University property is prohibited, and participants may be held financially responsible for damage or misuse of University property.
 - Clear statement that prohibits the inappropriate use of cameras, imaging and other digital recording devices, including cameras, imaging, and other digital recording applications on smart phones and mobile devices, in showers, restrooms, locker rooms, and other areas where privacy is expected by participants.
 - Established protocol for areas of drop off/pick up and release of minor.
 - Rules that identify areas of the program facilities where participants may be restricted from entering (e.g., storage rooms, equipment rooms, athletic training rooms, staff/faculty/administrator offices) and/or equipment that participants may be restricted from using.
5. A description of the process to be followed if a participant, group leader, or other individual associated with a youth program is alleged to have violated University policies or conduct rules of the program, including the process for dismissal and removal from the program.
6. A description of the process to be utilized for the parent, legal guardian, or other responsible adult to pick up the participant if he/she is dismissed from the program early.

7. Housing specific policies, if applicable, addressing:
 - Curfew time is age-appropriate for participants.
 - In-room visitation by participants of the of differing or opposite gender/identity expression.
 - Communal living/housing exceptions or accommodations for minor participants that are not able to adhere to or whose parents/legal guardians do not give their permission for a shared housing arrangement.
 - Visitation by non-participant guests restricted to public spaces in the building and only during approved hours specified by the program.
 - Requirement that separates accommodations are provided for Authorized Persons and youth, except when housing youth with their parents or guardians; and
 - Requirement that programs participants, staff, and volunteers must comply with all security measures and procedures specified by CSUSM Police and Housing Services.

Training

Staff and Volunteer Training

No Authorized Person will be allowed to conduct or participate in any program involving minors until all the required online training is completed, and the sponsoring department retains documentation.

Online Training Requirements

Single training highly encouraged for all staff, faculty, and volunteers; required for Authorized Persons:

Required Course	Frequency	Estimated Duration	Training Platform
Keeping Your Higher Education Program Safe	Annual	20 minutes	LearnerWeb

Three additional trainings are required for all Authorized Persons who have direct supervision of minor:

Required Course	Frequency	Estimated Duration	Training Platform
Keeping Your Day Camp Safe	Annual	20 minutes	LearnerWeb
Preventing Bullying	Annual	20 minutes	LearnerWeb
Social Media Safety	Annual	20 minutes	LearnerWeb
Required Course, if applicable -dependent on age of minors, program activity and duration – IRM determined	Frequency	Estimated Duration	Training Platform
Preventing Sexual Activity Between Young Children	Annual	20 minutes	LearnerWeb

Authorized Person

Below are instructions on how to access the online training:

1. Login to [Learnerweb](#) using CSUSM (California State University San Marcos) credentials
2. Select the "Course Search" tab on the homepage
3. Select the "Youth Protection" topic on the left side navigation
4. Click on the course tile to open the desired course homepage
5. Click on the "Launch" button to access the training
6. Once completed, your training should show as "Complete" or "Finished" To find a list of your course history, return to your home dashboard and select the "My Transcript" tile

For departments that do not have consistent youth programming, verification of training completion will be coordinated with IRM. IRM will need a list, preferably Excel, of all staff, faculty, and volunteers required to take the training. IRM will verify "finished" status against the training platform records. Any exceptions to completing the training will be determined on a case-by-case basis by IRM, based on criteria such as the staff/faculty/student involvement with the youth programming, timing of last completed training, and/or responsibility of training administered by another organization.

Training Outcomes:

Keeping Your Higher Education Program Safe:

- What are appropriate boundaries
- How to navigate high risk situations
- Best practices for responding to and reporting inappropriate behavior and abuse

Keeping Your Day Camp Safe:

- Where and when abuse is most likely to happen in a day camp setting and the steps you can take to keep kids safe

Preventing Bullying:

- What is bullying
- Why it's a problem
- What are the different types
- How bullying happens
- How you can prevent a child from being bullied

Social Media Safety

- Introduces guidelines for protecting youth in your care when using social media and electronic communication
- Identifies risks
- Respond appropriately to improper and illegal use

Preventing Sexual Activity Between Young Children

- How and where sexual activity between children typically occurs
- Steps to prevent sexual activity between children
- How to respond if sexual activity between children occurs

Additional In-person Training

Integrated Risk Management may conduct additional training for all Authorized Persons in-person and/or virtual when campus or corporation-sponsored programs include overnight stay at campus housing.

This should be coordinated **30 days in advance** with Integrated Risk Management and all staff, faculty, and/or volunteers must be present.

If an Authorized Person cannot attend the training date, please document what Authorized Person could not attend training, and the date the Program Director facilitated the make-up training.

Program Directors Training

Program directors are expected to provide training to program staff and volunteers that address the following topics:

1. Program responsibilities and expectations
2. Conduct rules for staff and volunteers
3. Appropriate interactions with and supervision of youth
4. Program policies and procedures
5. What to do in the event of a crisis or emergency
6. Safety and security precautions
7. Prohibited harassment and reporting obligations
8. Mandated reporter and University reporting protocols for suspected child abuse, sexual assault, or child pornography
9. CSUSM Nondiscrimination expectations
10. Prohibition of retaliation against youth, families, parents, guardians, and staff/volunteers who report allegations of inappropriate conduct, including but not limited to abuse, neglect, assault, harassment, sexual assault, sexual abuse, sexual harassment, child pornography, furnishing alcohol, drugs, and/or sexual materials to a youth, and violations of Nondiscrimination expectations, per current CSU policies and requirements.

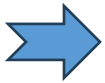
Rules for Youth Program Staff and Volunteers

Program directors are expected to notify program staff and volunteers of applicable program rules, review conduct expectations and provide the Staff and Volunteer Handbook which outlines expectations for working with youth. Program staff and volunteers must abide by all University regulations and may be removed from the program for violation of such rules. Program rules for program staff and volunteers must include the following:

1. The supervision ratio expectations addressing the number of Authorized Persons who must be present during activities where youth are present.
2. Youth program directors and coordinators must make reasonable efforts to limit one-on-one contact between Authorized Persons and youth participating in youth programs.
 - a. Reasonable efforts must be made to have two or more Authorized Persons present during activities where a single youth is present.
 - b. Reasonable efforts must be made to involve more than one adult in any electronic contact with youth.
 - c. Staff/volunteers should ensure another adult staff/volunteer is present when addressing youth in private areas (e.g.: restrooms, bedrooms, study lounges, and similar areas).
 - d. If handling an emergency when only one youth is present, the adult responding should make reasonable efforts to contact another adult to come and assist as immediately as possible.
 - e. Staff expected to contact a single youth for official academic or programmatic recruitment may do so as directed by their supervisor by E-mail or phone call during standard business hours.
3. Authorized Persons may have no personal, non-programmatic related electronic communications with youth participants (email, phone, text, Facebook, etc.) during the program.
4. Authorized Persons may not take pictures of youth or post information about youth to social media sites without permission from a parent/guardian.
5. Authorized Persons may not meet youth participants off-site or off-hours.
6. Authorized Persons may not give personal gifts to youth participants.
7. Authorized Persons may not possess, consume, or be under the influence of alcohol, medical marijuana, or illegal drugs at any time the adult has responsibility for youth participants.
8. Authorized Persons may not violate the Interim CSU Nondiscrimination Policy.
9. Authorized Persons may not engage in abusive conduct of any kind toward, or in the presence of, a youth. This includes inappropriate physical contact and inappropriate verbal interactions, such as cursing, derogatory remarks, off color or sexual jokes, etc. in person or electronically.
10. Authorized Persons may not strike, hit, administer corporal punishment of any kind to, or touch youth in an inappropriate or illegal manner.
11. Authorized Persons may not pick up youth from or drop off youth at their homes, other than the driver's child/children, or except as specifically authorized in writing by the youth's parent/legal guardian.
12. Authorized Persons may not provide alcohol or illegal drugs to any youth.
13. Authorized Persons may not provide prescription drugs or any medication to any youth, unless the adult is a medical professional who has been specifically authorized in writing by the parent or legal guardian to administer the medication as required for the youth's care or emergency treatment.

14. Authorized Persons may not make sexual materials in any form available to youth or assist them in any way in gaining access to such materials.
15. Authorized Persons may not retaliate against youth, families, parents, guardians, and staff/volunteers who report allegations of inappropriate conduct including but not limited to abuse, neglect, assault, harassment, sexual assault, sexual abuse, sexual harassment, child pornography, furnishing alcohol, drugs, and/or sexual materials to a youth, or violations of the Interim CSU Nondiscrimination Policy.
16. If an allegation of inappropriate conduct including but not limited to abuse, neglect, assault, harassment, sexual assault, sexual abuse, sexual harassment, child pornography, furnishing alcohol, drugs, and/or sexual materials to a youth, and violations of the Interim CSU Nondiscrimination Policy is made against an Authorized Person participating in a program, including program staff/volunteers, the accused Authorized Person must be removed from any further participation in programs and activities covered by this policy until such allegation has been satisfactorily resolved.

Program Directors must provide the Staff and Volunteer Handbook and collect the completed "Signed Acknowledgement" located at the end of the handbook and retain the record.



Authorized Persons can directly supervise minors once the following is complete. Completed training is defined as:

1. Background clearance is completed (Live Scan and Registry Check)
2. Mandated Reporter training/authorization is completed
3. Required online youth protection training modules are "finished"
4. Signed Acknowledgement has been completed and returned to program director

Third-Party, Cosponsored Programs, On-Campus Day Visits

Working with third parties and facility rentals can present unique abuse risk management challenges. Facility rentals and non-university/third party and cosponsored programs occurring on campus include standardized written documents that hold the university harmless and attest to the requirements for screening and working with youth.

Third Party Facility Use:

Third Parties using University facilities for programs involving youth must be coordinated through the the Procurement & Contracts department for the use of facilities, which should include the use of a Facility Use Agreement with Exhibit F, Youth Event Agreement Addendum and Insurance Requirements. Exhibit F includes language that requires the third party to confirm all individuals responsible for youth have undergone screening consistent with CSU policy, comply with California

Mandated Reporting law, confirm there is adequate supervision per campus policy, and confirm all allegations of any kind must be reported back to the University. The agreement should also include a requirement for the third party to provide evidence of Sexual Abuse and Molestation insurance coverage and to name The State of California, the Trustees of The California State University, California State University San Marcos, the California State University San Marcos Corporation, and the employees, volunteers, officers, agents of each of them, as additional insured on their General Liability and Sexual Abuse and Molestation insurance policies.

Co-Sponsored:

[CSUSM Youth Organization Outreach Agreement](#) is available for single-day or one-time off-campus outreach events that do not already have an agreement in place.

Campus and auxiliary programs coordinating a larger scale and/or ongoing youth programs/activities with a Third Party shall coordinate with Procurement & Contracts to have an agreement in place that includes CSU terms and conditions and each party's responsibilities based on the CSUSM Youth Protection guidelines. Consult with Procurement & Contracts for ongoing campus outreach events.

On Campus Day Visits

On campus day visits chaperoned by another institution or organization, should complete the [CSUSM On-Campus Activity Participation Agreement](#) before arrival. The agreement shall be retained by the department facilitating the visit.

Virtual Programs

Programs conducted in a virtual or online format must follow the same guidelines as in-person programs, to the extent that they are applicable. Some additional considerations for virtually conducted youth programs include:

- At least two Authorized Persons must be online during any live program, to supervise content and participant behavior.
- Set and maintain consistent session beginning and ending times.
- Authorized Persons assisting with the virtual program must be trained on how to use the online platform being used for the program.
- Authorized Persons assisting with the program may have no private or personal, non-program related electronic communication with youth participants, including phone, email, texting or the use of social networking websites or applications such as Facebook, Instagram, Snapchat, etc. All communication between adults and youth must be transparent.

Online Platforms and Access

The **Children's Online Privacy Protection Act (COPPA)** is a federal law that regulates websites, apps, and online services that collect and use personal information from children under 13. It requires notice, parental consent, and safeguards for children's data.

What kinds of university activities might trigger COPPA?

- Youth outreach: Summer camps, STEM/arts programs, tutoring, or partnership with K-12 schools.
- Research studies: projects involving children under 13 where information is collected online
- Event registration: online forms where minors under 13 sign up.
- Digital platforms: apps, games, or learning tools hosted by the university.

Please consult with IRM if your youth program is required to adhere to COPPA or if there are any related questions.

Online programs must utilize a platform approved by CSUSM. Contact IITS for information about supported platforms.

- Establish online platform access where the program director must accept each person into the meeting location to avoid unwanted guests in the program.
- Ensure that participants are properly identified by name (not by phone number) in the virtual environment, to protect the privacy of participants.
- Consider displaying only first names of participants while in the virtual environment.
- Ensure that the background is appropriate by using a suitable virtual background or by checking in advance to confirm that the location visible in the background is appropriate.
- Disable the chatroom option, if possible, or assign one adult to monitor chatroom activity to avoid cyberbullying and intervene in unacceptable communications.
- Control participants' ability to mute/unmute, share screens, share documents, and disable private chat between participants.

Transportation of Youth

Units operating a youth program that involves transporting youth (aka field trip) as part of the program activity must comply with the following requirements:

1. A transportation authorization must be included in the registration process.
2. University youth programs utilizing commercial transportation services must follow CSU guidelines related to commercial transportation.
3. More than one Authorized Person must be present in the vehicle except when there are multiple youths for the duration of the transportation.

Concussion Awareness

Units operating a youth athletic activity must comply with the University concussion practices' requirements for [student athletes](#) and follow return to play/return to work guidelines. All head injuries must be reported to the Athletic Trainer on site who is designated to the youth camp or call UPD x4567. For medical emergencies call 9-1-1.

Abuse Reporting Protocols

California Law and CSU Policy related to Suspected Child Abuse or Neglect

The University maintains zero tolerance for child abuse and neglect. As such, it is imperative that every person actively participates in the protection of youth and remains alert and steadfast in safeguarding youth on and off campus.

Every member of the university community must respond to and internally notify the University of violations of this policy including inappropriate or suspicious behaviors that may not rise to the level of Child Abuse and Neglect as defined by Executive Order 1083, minor-to-minor sexualized behavior, assault, exploitation, intercourse, or misconduct with or amongst minors.

Notifications to the University must be made to a supervisor or an administrator as described in accordance with [CSU Executive Order 1083](#) and [CSUSM Mandatory Reporting of Child Abuse and Neglect](#).

CSU employees and volunteers have a mandatory reporting obligation to the Title IX/Discrimination, Harassment and Retaliation (DHR) Office. If any employee or volunteer becomes aware of concern of Sexual Harassment (including Sexual Violence), Discrimination, Harassment, Sexual Misconduct, Sexual Exploitation, Dating Violence, Domestic Violence, Stalking and/or Retaliation, this must be reported to the Title IX/DHR office. Reports can be made in person, or by using the options below. Please see the [Interim CSU Nondiscrimination Policy](#) for more details.

Reporting Method Options:

1. Make a report via phone – 760-750-6020
2. Make a report via email – nondiscrimination@csusm.edu
3. Make a report via the online reporting form - [Title IX / Discrimination, Harassment, and Retaliation \(DHR\) Reporting Form](#)

Office of Human Resources, Corporation Human Resources, and Faculty Affairs are responsible for identifying Mandated Reporters based on the broad categories outlined in CANRA. As a matter of CSU policy, all Management Personnel Plan (MPP) employees and volunteers are considered Limited Reporters, unless they are in positions that require the General Reporter designation.

Process for Reporting Suspected Child Abuse or Neglect

In case of an emergency or if a crime is in progress, Authorized Persons should immediately call campus police or 911; for all other reporting, see below.

Step 1: Immediately, or as soon as practically possible, contact by phone one of the following:

- University Police Department (760) 750-4567
- San Diego County Sheriff's Department (858) 565-5200
- San Diego County Children Services Division (858) 560-2191 (Child Welfare Services Hotline)

Step 2: Within 36 hours of receiving the information concerning the incident:

Complete [Form SS 8572](#) and fax, or electronically transmit it to the agency that was contacted by phone. (Penal Code § 11166(a))

For questions please contact the following:

Contact Info

Employee Type	Contact Name	Phone	Email
Staff, MPPs, Student Employees, Volunteers	Lisa McLean, Senior Director of Human Resources	760-750-4418	lmclean@csusm.edu
Unit 3 Faculty and Unit 11 Student Assistants	Michelle Hunt, Associate Vice President for Faculty Affairs	760-750-8820	mihunt@csusm.edu

Auxiliary organizations are responsible for designating their employees and notifying them of their CANRA obligations as an auxiliary employee. For questions, please contact Michelle Hinojosa CSUSM Corporation Director of Human Resources at 760-750-4707 or mhinojos@csusm.edu.

Campus must comply with the requirements of the Higher Education Opportunity Act of 2008, including 20 U.S.C. § 1092(i) and 20 U.S.C. § 1092(f), also known as the [Jeanne Clery Disclosure of Campus Safety Security Policy and Campus Crime Statistics Act](#), commonly referred to as the Clery Act including CSU Executive Order 1107. Campus must also comply with the implementing regulations found at 34 C.F.R. § 668.

Reporting other serious concerns, incidents and violations relating to minors

Other serious concerns, incidents (please call 9-1-1 for all emergencies) and violations relating to non-matriculated minors that may not seem to rise to the level of known or suspected abuse must also be

reported to Integrated Risk Management (risk@csusm.edu) and Programing Sponsor and Director as soon as possible and within no more than 24 hours of learning about the original concern. This includes, but is not limited to:

- Serious injuries, accidents, etc. involving minors
- Medical or mental health emergencies (subject to any medical confidentiality requirements)
- Near misses (e.g., a situation that could have resulted in a serious accident or injury)
- Inappropriate behavior, including grooming behavior or boundary violations¹
- Misconduct between minors
- Inadequate supervision

Emergency Protocols

For emergencies call or text 911. For non-emergencies or to make a criminal police report call (760) 750-4567.

In the event of an emergency, please follow the emergency procedures found here:

<https://www.csusm.edu/em/documents/emprocedureposter.pdf>

Emergency Notification System (ENS): IRM recommends all participants and parents enroll in the ENS which alerts subscribers to emergency situations as quickly as possible. Emergency alerts are reserved for critical incidents that pose an imminent threat to life, and/or the health and safety of the University community.

- To enroll, **TEXT: csusmyouth to 226787**

Enrollment in the emergency notification system will expire 30 days after opt-in.

Roles and Responsibilities

Integrated Risk Management

- Youth Protection Policy administrator and program consultant
- Update resource documents
- Review registered programs and advise Program Sponsors and Directors on program details
- Secure participant accident insurance with the broker, when applicable
- Review completion of training requirements, when applicable
- Receive and disseminate information to necessary stakeholders involving incidents and violations related to youth programming.

¹ [Any behavior relating to Sexual Harassment \(including Sexual Violence\), Discrimination, Harassment, Sexual Misconduct, Sexual Exploitation, Dating Violence, Domestic Violence, Stalking and/or Retaliation must still be reported to the Title IX/DHR office as soon as possible](#)

Program Directors

- Adhere to all program elements per policy before the start of the Youth Program.
- Use CSUSM Managing Risk in Youth Program Resource Guide and checklist as a procedural resource to complete all youth protection elements.
- Encouraged to notify relevant campus stakeholders (e.g., UPD, Housing, Dining, etc.) of upcoming programming, including but not limited to number of participants, housing arrangements, duration of camp, etc.)
- Responsible for daily program operations and supervision of all Authorized Persons, faculty, staff and/or volunteers supporting youth programming.

Program Sponsors

- Responsible for being familiar with all relevant policies and guidelines applicable to youth protection.
- Ensure timely completion of applicable procedures to ensure compliance.
- Are encouraged to conduct a program review before the event to confirm all Program Elements have been completed. Please refer to Program Elements found on page 6 in this guide.

Human Resources and Corporation Human Resources

- Adherence to Background Check Policy, Technical Letter 2017-17
- Adherence to providing Mandated Reporter acknowledgement or training defined by EO1083 & CANRA
- Notify Program Director and Integrated Risk Management if background check is not “clear”
- Check the National Sexual Offender database and retaining record

Auxiliary and Campus Procurement

- Coordinate with Integrated Risk Management on contract language and contractual insurance requirements.
- Retain agreements in compliance with applicable CSU document retention policies.
- Collect and verify Sexual Abuse and Molestation (SAM) insurance coverage for third parties.

University Police Department

- If called, respond to and investigate allegations of “sexual abuse and neglect” as defined by California Child Abuse and Neglect Reporting Act (CANRA)
- Respond to emergencies

Title IX

- Respond to internal reports related to [Interim CSU Nondiscrimination Policy](#)

Forms and Resources

Model Forms

All model forms referenced in this guide can be found in the linked [Youth Protection: Program Checklist](#)

Units operating a youth program should comply with the following requirements:

Participant forms that cannot be altered and have been vetted by legal counsel:

- General Release of Liability Form – required
- Media Release Form – required
- Medical Treatment Authorization - required
- Sign In/ Sign Out Consent Form - only for programs with minors over 14 years of age
- Transportation Form – only for youth programs taking a field trip off campus

Participant forms that can be altered and are program specific

- Registration Form – template
- Parent and Participant Handbook Template – required, needs to be updated to meet specific program details

Staff and campus documents established to facilitate training or execute an agreement:

- Staff and Volunteer Handbook (includes required signed acknowledgement)
- CSUSM On-Campus Youth Activity Agreement
- CSUSM Outreach Activity Agreement

Resources

[CSU Youth Protection Policy](#)

[CSU Managing Risk in Youth Programs – Resource Guide](#)

[California Child Abuse and Neglect Reporting Act \(CANRA\)](#)

[Protecting Young Victims from Sexual Abuse and Safe Sport Authorization Act of 2017](#)

[CSU Policy \(EO 1083\): Mandated Reporting of Child Abuse and Neglect](#)

[CSU Policy \(Technical Letter HR2017-17\): Background Check Policy](#)

[CSU Policy \(EO1096\): Discrimination, Harassment, Retaliation Sexual Misconduct, Dating and Domestic violence, and Stalking against Employees and Third Parties](#)

[CSU Policy \(EO 1098\) Student Conduct Process](#)

[CSUSM Policy: Mandatory Reporting of Child Abuse and Neglect](#)

