



Policy on Minors Participating in Faculty Research Labs

Responsible Offices:

Provost's Office
Risk Management
Institutional Review Board

Effective Date: February 2, 2026

1. Purpose

This policy establishes required procedures, safeguards, and responsibilities for the involvement of Minors (individuals under age 18) in research laboratories on the Loyola University New Orleans campus or in university–managed facilities.

The policy is intended to protect the safety and welfare of Minors consistent with Loyola's [Minors on Campus Policy](#), to ensure compliance with federal privacy regulations ([FERPA](#)), and to align with Institutional Review Board ([IRB](#)) requirements when research involving human subjects is conducted.

2. Scope

- A. This policy applies to:
 - a. All faculty, staff, graduate students, and research personnel supervising or working with Minors in research laboratories
 - b. All Minors participating in research activities on campus, in university-affiliated facilities, or under the supervision of university personnel
- B. This policy does not apply to:
 - a. Dual enrollment students formally enrolled in university coursework
 - b. Students participating in institutionally sponsored summer programs governed by separate policies
 - c. Minors who are enrolled as degree-seeking or non-degree-seeking university students
- C. Minors participating under this policy:
 - a. May not receive academic credit
 - b. May receive stipends or compensation
 - c. Must not be represented as university students

3. Definitions

- A. **Minor:** An individual under the age of 18 who is not enrolled as a Loyola University student and not receiving academic credit
- B. **Authorized Adult:** Per the Minors on Campus Policy, an adult who interacts with or supervises Minors in program activities.
- C. **Research Laboratory:** A physical or virtual site where research activities occur, including labs, studios, computational facilities, etc.
- D. **Human Subjects Research:** Research involving living individuals from whom data are obtained through interaction or identifiable private information, subject to IRB review.

4. General Eligibility and Participation Requirements

- A. **Faculty Authorization:** Laboratory participation by any minor must be approved in writing by the faculty supervisor and department chair/program director prior to initiation.
- B. **Minors on Campus Policy Compliance:** All provisions of the *Minors on Campus Policy* apply, including requirements for supervision, prohibited activities, and one-on-one interaction restrictions.
- C. **Supervision:** Minors must be supervised at all times by Loyola personnel trained and approved to work with Minors; unsupervised access is prohibited.
- D. **Hazard Restrictions:** Minors may *not* engage in activities involving hazardous chemicals, biological agents, high-voltage systems, radiation, or other risks prohibited by Loyola or state law.

5. Training and Background Checks

- A. Any Loyola personnel who will supervise Minors must:
 - a. Complete mandatory online training (e.g., reporting requirements, recognizing abuse/neglect) before the minor's participation.
 - b. Complete any supplemental lab safety training required by the department or Environmental Health & Safety.
 - c. Where applicable, complete background checks consistent with Loyola procedures for programs involving Minors.

6. Parental/Guardian Consent and Documentation

- A. Prior to participation:
 - a. Obtain a signed parental/guardian consent form detailing activities, supervision, risks, emergency contacts, and any relevant health information.
 - b. Ensure waivers and emergency contact forms are on file in the host department.
- B. No Minor may participate without completed documentation.

7. FERPA Considerations

- A. Because Minors participating under this policy are not enrolled students, FERPA does not automatically apply to their records as educational records.
- B. However, if any records are created that could later become part of an educational record (e.g., evaluations, recommendation letters, or records shared with schools), the university will:
 - a. Treat such records as confidential
 - b. Limit access to individuals with a legitimate educational or research interest
 - c. Release information only with written parental/guardian consent
- C. If a minor later matriculates or enrolls at the university, records created during participation may become subject to FERPA at that time.

8. IRB Considerations

- A. **Observation Only:** If Minors are purely observing research and not engaging as research participants, IRB approval for their presence is generally *not* required.
- B. **Data Involvement:** If a minor's work includes human subjects research as data collector, or if Minors are subjects of research, appropriate IRB review and approval are required *before* participation.
- C. **Human Subjects Work:** Research involving Minors as human subjects must follow federal regulations (45 CFR 46, Subpart D), including parental consent and minor assent.
- D. Faculty must consult the IRB office prior to involving Minors in any research activity that might qualify as human subjects research.

9. Safety, Conduct, and Risk Management

- A. Host departments must ensure compliance with university safety policies, emergency procedures, and risk management protocols.
- B. All incidents, injuries, or concerns must be reported immediately in accordance with Loyola's safety reporting procedures and the Minors on Campus reporting requirements.

10. Training and Background Checks

- A. Faculty supervisors must ensure Minors receive appropriate orientation, including:
 - a. Laboratory safety training
 - b. Confidentiality and data privacy expectations
 - c. Responsible conduct of research (as appropriate)
- B. Faculty and staff working directly with Minors must comply with institutional background check requirements before any work begins.

11. Supervision and Conduct

- A. A designated faculty supervisor is responsible for:

- a. Oversight of the minor's activities
 - b. Ensuring compliance with all university policies
 - c. Serving as the primary point of contact for parents/guardians
- B. Minors may not be left alone with a single supervisor in isolated settings; best practices for working with Minors must be followed.