

Guidance regarding minors (those under 18 years of age) working in NIH laboratories is provided in *NIH Policy Manual Chapter 3015: Admittance of Minors to Hazardous Areas*: <http://www1.od.nih.gov/oma/manualchapters/intramural/3015/>.

A summary of this policy is provided below with particular emphasis for the Werner Kirsten Student Intern Program (SIP) participants at the NCI-Frederick. This document contains specific information applicable to all minors working at the NCI-Frederick or any off-site facility managed by NCI-Frederick.

1. Persons under 16 may not work in laboratories at the NCI-F.
2. Each laboratory with a SIP participant or other minor/student under the age of 18 must provide a comprehensive research plan, clearly identifying all potentially hazardous materials or situations that may be encountered by the minor/student during their time in the laboratory, to the SIP Administrative Coordinator and EHS (Environment, Health and Safety Program) for review and approval. If changes in the research scope cause a change in potential for exposure to hazardous materials or activities, the research plan must be amended and resubmitted for review prior to implementation of the modified research scope.
3. Minors must be directly supervised while they are in the laboratory.
4. Minors are prohibited from the following :
 - working with radiation source vials,
 - any work with low-level radioactive materials unless approval is obtained in writing by the NCI-F Radiation Safety Office,
 - working with human or nonhuman primate tissues, blood or body fluids (other biological hazards and potentially infectious materials are evaluated by EHS on a case-by-case basis),
 - working with non-human primates,
 - working in laboratories posted at BSL2 with BSL 3 practices (also termed BSL-2* or BSL-2 enhanced),
 - working in laboratories posted at BSL-3, and above,
 - working in laboratories where known carcinogens, reproductive toxins or other acutely toxic chemicals are handled. Lists and definitions of these prohibited chemicals can be found in Appendix A - *Guidance in Identifying Particularly Hazardous Substances* of the NIH Chemical Hygiene Plan:
<http://dohs.ors.od.nih.gov/pdf/NIH-CHP.pdf>
5. SIP participants and other minors must attend a one-day EHS-sponsored safety orientation covering various health and safety topics relevant to the laboratory procedures they will be performing and the general hazards that may be encountered in NCI-F laboratories. Additional training, relevant to practices,

Attachment I
Minors Guidance Document
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procedures, laboratory equipment, personal protective equipment, and other laboratory-specific hazards, must be provided and documented by the supervisor. An EHS New Employee Orientation Checklist must be completed and submitted to EHS to assist with this requirement:

<http://home.ncifcrf.gov/ehs/uploadedFiles/New%20Employee%20Orientation%20Checklist03.pdf>.

6. All minors must be provided with and use appropriate personal protective equipment and wear clothing appropriate for the laboratory. Long pants and closed-toe shoes must be worn in the laboratories. Shorts and sandals are never appropriate for wear in NCI-F laboratories. The minimum requirements for dress and personal protective equipment are found below.
 - Closed-toe, non-perforated shoes: Sneakers, boots, and walking shoes are examples of generally acceptable footwear. Sandals, flip-flops, rubber shoes with holes in them, open shoes and the like are NOT safe to wear in the lab.
 - Arms, legs and feet must be covered while in the lab. Long-sleeves and long pants are required for working in labs. The long sleeves of lab coats over any top provide adequate protection from most materials. When working with certain hazards, it is appropriate to wear additional or alternate protection, such as a chemical-resistant or fire-retardant apron.
 - Each lab is required to assess anticipated hazards and direct the student to use proper eye and face protection and wear appropriate gloves. Contact EHS for additional guidance, when needed
 - Lab coats and gloves must not be worn outside the laboratory.

7. All minor employees are also required to follow all relevant safety and environmental requirements of the NCI-Frederick.