January 26, 2015

Ana Mari Cauce
Professor of Psychology and American Ethnic Studies
Provost and Executive Vice President

Dear Provost Cauce:

In November 2013, you asked the Safety of Minors Committee to identify, assess and create a plan for mitigation of possible risks to minors on our campus. In the past months, the Committee has completed a survey of University-sponsored programs with minors, assessed the compliance areas for safety of minors, and reviewed best practices and legal requirements. After careful review and discussion, the Committee recommends the creation of a Safety of Minors Office. Below you will find details explaining – and background supporting – the Committee’s recommendation.

Background

Minors at UW
Based on an informal survey completed by the Risk Management Compliance Support Program, there are at least 27,000 minors on the University of Washington campus in any given year, ranging in age from three to seventeen, participating in over 100 programs as varied as Educational Outreach UW Summer Day Camps to the Dream Project to the Center for Urban Horticulture Nature Preschool. While many of these programs are well established and have had a remarkable history of safety and success, there is no method for the University to monitor the development and practices of these programs. University policies and guidelines that may relate to minors have not been reviewed and coordinated with a focus on this special population.

Best Practices
The Committee reviewed the policies, guidelines and practices of many higher education institutions around the country. Many universities are beginning to create centralized offices to track programs for minors, many within compliance, risk management or ethics offices. Most have some institutional policies in place regarding the safety of minors on campus, especially around mandated reporting of suspected child abuse. No single institution is employing what could be modeled as comprehensive best practices. Institutions reviewed:
Peer Institutions: University of Arizona; University of California, Berkeley; University of Illinois, Urbana/Champlain; University of Iowa; University of Michigan, Ann Arbor; University of North Carolina, Chapel Hill; and University of Oregon with Oregon Health Sciences Center

Other Universities: Columbia University, University of Connecticut, Duke University, University of Florida, Georgetown University, Indiana University, Penn State, University of Rochester, Syracuse University, Texas A&M, and Vanderbilt University

Additionally, guidelines and recommended practices from the following were reviewed carefully:

- “Preventing Child Sexual Abuse Within Youth-Serving Organizations”, U.S. Department of Health and Human Services, Centers for Disease Control and Prevention (CDC)
- United Educators
- American Camp Association Accreditation and Standards
- Seattle Public Schools volunteer policies and forms
- The Freeh Report on Pennsylvania State University (PSU), an independent investigation and report commissioned by the PSU of the law firm Freeh Sporkin & Sullivan, LLP, was issued in 2012 and included recommendations for governance, administration, and protection of children at PSU. Jack Johnson, former Chief of Staff, Office of the President, reviewed the Freeh Report recommendations and mapped the status of UW in each category. The recommendations in the Freeh Report section, “Management of University Programs for Children & Access to Facilities” propose a centralized service approach to child safety.

Child Abuse Reporting Law
In the Committee’s first year of work during 2012-2013, a formal policy, University Administrative Policy Statement 11.8, Reporting Suspected Child Abuse, was approved. Online training was created informing employees of their requirement to report suspected child abuse or neglect. This policy relates to the Washington Abuse of Children Law (Revised Code of Washington 26.44). The Compliance Support Program in Risk Management led this effort, but the needs of UW-sponsored programs for minors are more broad than this program can support.

Recommendation: Create a Safety of Minors Office

The Safety of Minors Committee recommends the creation of an independent and centralized Safety of Minors Office to provide strategic support and consultation services for the 100+ University programs whose primary purpose is working with
minors. Many of these programs also offer important educational and mentoring experiences for our enrolled students. The Safety of Minors Office would provide the expertise and guidance to ensure the programs operate within the University's educational and strategic goals, as well as operationalize safety and compliance into the design of each program.

The focus of the Safety of Minors Office's first two years of work would be to create institutional infrastructure for on and off-campus programs that involve contact with or the participation of minors. Over time, the emphasis of the program would evolve into monitoring and providing consultative support for unique issues that arise in current programs. This work would include:

**Policies and Guidelines:** With the Office of Risk Management Compliance Support Program, review, develop, and implement policies that require compliance by UW-sponsored programs for minors, as recommended by the Safety of Minors Committee. Work with programs to identify and develop age and program-appropriate guidelines that are recommended best practices.

Priorities include:

- Screening and selecting employees and volunteers, including background checks
- Training requirements for employees and volunteers who work with minors
- Creating safe environments
- Establishing and monitoring standards of conduct
- Communication with parents and guardians, including acknowledgement of risk forms
- Incident reporting and response, including APS 11.8 – Reporting Suspected Child Abuse

**Training:** Create centralized trainings, both in-person and online, as appropriate. Provide consultation for and review program-developed, program-specific training. (A full-day training session for programs with minors was offered and well-received on May 7, 2014.)

**Consulting:** Respond to discrete questions and issues from programs relating to safety of program participants.

**Monitoring:** Determine a system for monitoring and auditing programs' adherence to University policies.

As new programs for minors are developed, this office would be instrumental in providing support and education regarding minors-related University policies and guidelines. Additionally, in ongoing consultation with the Office of Risk Management Compliance Support Program, this office would constantly monitor best practices and developments in legal requirements and best practices relating to minors.
While the primary and initial focus of the office would be on the 27,000 minors in UW-sponsored programs, future efforts could also include reviewing and assessing the safety and needs of minors in other areas of the University: enrolled students, family housing owned and/or managed by the University, patients, human subjects, and/or public events held on campus.

Request for Approval and Funding

The Safety of Minors Committee is seeking your approval and funding to create a Safety of Minors Office, granted the appropriate authority to effectively monitor programs' compliance with institutional policy requirements. An estimated $150,000 in temporary funding per year for 2-3 years is requested for start-up; options for becoming a self-sustaining office would be evaluated towards the end of that time.

Because many programs that serve minors are in Undergraduate Academic Affairs, Ed Taylor and I are available to meet with you to discuss this proposal, including possible location and reporting options for this office, and the temporary funding request to get it started. We would also like to include Elizabeth Cherry and Amanda Paye from the Office of Risk Management, for their experience and ongoing role in safety of minors policy creation and regulatory compliance.

Sincerely,

Denzil Suite, Vice President for Student Life
Chair, Safety of Minors Committee

Safety of Minors Committee Members
Denzil Suite (Chair), Vice President for Student Life
David Anderson, Executive Director, Health Sciences Administration
Cheryl Cameron, Vice Provost for Academic Personnel, Office of the Provost
Bonnie Conley, Director of Social Work, Harborview Medical Center
Mindy Kornberg, Vice President, Human Resources
Leslie Rome-Nagata, Director, Summer Programs, UW Educational Outreach
Robert Sasaki, Senior Associate Athletic Director
Robert Stacey, Dean, College of Arts and Sciences
George Theo, Dean of Student Affairs, UW Bothell

Support
Elizabeth Cherry, Executive Director, Risk Management
Amanda Paye, Associate Director, Compliance Support Program, Risk Management
Susan Freccia, Project Manager, Compliance Support Program, Risk Management