



## Guide for Youth Programs and Activities



THE UNIVERSITY OF  
**ALABAMA**<sup>®</sup>

*Division of*  
**Financial Affairs**  
**Compliance, Ethics, and Regulatory Affairs**

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**Compliance, Ethics, and Regulatory Affairs**

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# I. Program Overview

The University of Alabama (“the University” or “UA”) is committed to providing a safe and welcoming experience for minors. Faculty, staff, students, student employees, graduate assistants, contractors, or volunteers are therefore expected to hold themselves to the highest standards of conduct when interacting with minors, as outlined by the [Youth Protection Policy Governing Activities or Programs with Minor Participants](#). This Guide is designed to assist with the development of guidelines and practices to support compliance with University policy regarding activities or programs for or that include minors, including camps, conferences, and outreach activities. Terms defined in the University’s Policy Governing Activities or programs with Minor Participants carry the same definitions when used herein. All areas/programs are still subject to all other relevant UA policies and procedures, including the UA [Child Protection Policy](#) and the [Facilities and Grounds Use Policy](#). Except for the exclusions listed in the next paragraph, all activities or programs for and that include minors are within the scope of this Policy. This includes, but is not limited to:

- Activities or programs for or that include minors that the University operates on campus or in University facilities, including, but not limited to: overnight camps, instructional programs, day camps, academic camps, and sports camps.
- Activities or programs for or that include minors that are operated, conducted, or organized by Third Parties that take place on campus or in University facilities, including, but not limited to, facility rentals to third-party organizations.
- Activities or programs for or that include minors that the University operates that do not take place on campus, including, but not limited to, outreach and community service activities.
- Faculty or staff who bring minors to campus as interns or volunteers outside of a structured activity or program for or that include minors (e.g., to intern in a laboratory). This could also include auditions, lessons, tutoring, or tours where the parent or guardian is not present.
- Student organizations or any other University-affiliated organization operating, facilitating, or sponsoring activities or programs for or that include minors.

This policy does not apply to:

- Undergraduate and graduate academic programs in which individuals under the age of 19 are enrolled for academic credit or have been accepted for enrollment as a student at the University.
- Events on campus open to the general public that minors may also attend.
- Events or programs offered by University personnel in which the minor is accompanied by their parent(s) or guardian(s) at all times.
- Research programs involving minors which are approved by the University’s Institutional Review Board (IRB).
- Medical care given to minors in an in-patient or out-patient setting in the University Medical Center or other University patient-care setting.

- Normal operations of licensed childcare facilities or programs. These facilities or programs are expected to comply with all applicable laws and regulations and are outside the scope of this policy. However, separate camps or programs sponsored by these facilities could be subject to this policy.
- Minors employed by the University.

**All questions, documents, or communications should be directed to:**

Compliance, Ethics, and Regulatory Affairs

Box 870107, 401 Queen City Avenue

205-348-2334

[youthprotection@fa.ua.edu](mailto:youthprotection@fa.ua.edu)

## II. Planning Your Program

There are several components to planning youth programs and activities that must be considered early in the process to ensure a successful event. This section outlines the major topics that should be explored prior to registering the program or registering participants.

### 1. Agenda

The first step in developing the program is to map out the agenda, detailing the activities, locations, and timeframes. Youth participants must be supervised at all times from drop-off to pick-up. Ensure that all meals, free time, and transitional times are accounted for and supervision is provided.

### 2. Operating Procedures

It is important to document expectations of how administrative duties will be handled throughout the event and ensure that all program staff have a clear understanding of their responsibilities. Topics to be addressed include:

- **Identification of Program Staff.** How will parents and program participants be able to identify program staff? Will they wear specific clothing or nametags?
- **Procedures for drop-off and pick-up.** How will you ensure that participants are only released to an authorized individual (parent, guardian, or documented designee)? Who will be responsible for managing this process?
- **Emergency Communication.** How will you communicate with parents if an emergency situation occurs? This could include accidents affecting only one or two children or weather issues that require cancellation of activities. Also consider providing an emergency contact name and phone number for parents who may need to contact their child during the event.
- **Behavior Management.** Sometimes children need a little extra encouragement to follow the rules. Who would handle children with behavior issues that need to be dealt

with away from the rest of the group? If parents must be called to pick-up the child, who would supervise them while they wait?

- **Physical Contact and Communication with Participants.** Operating procedures should also include guidelines that detail the appropriate physical contact and communication by Program staff with minors based on the age of the minor and the nature of the program activities. Any behavior or contact between Program Staff and Program Participants that violates approved program activities, established law, UA's [Child Protection Policy](#), or other relevant UA policies is prohibited.

### 3. Housing

#### *Accommodations*

For programs which require that participants stay overnight, arrangements may be made with [Housing and Residential Communities](#) to provide accommodations. Available dates run from late May through the end of July, and space is allotted on a first come, first served basis.

Questions regarding housing accommodations may be directed to:

Kathy Gray  
Phone: (205) 348-1023  
[kathy.gray@ua.edu](mailto:kathy.gray@ua.edu)

#### *Overnight Supervision*

Overnight programs present a unique set of challenges that must be managed carefully. Please be aware of the following safety precautions.

- Additional supervision is required for overnight programs. See the Program Staff section for acceptable ratios based on participant age group.
- Program staff should not enter participant rooms alone. If it is necessary to enter a room to check on a participant, two staff members should go together. If another staff member is not available, be sure to leave the door open and get in and out as quickly as possible.

### 4. Transportation

Transportation plans, including information regarding the transportation of minors at the beginning and end of the program, to and from the program, and within the program, whether by parents, guardians, Program Staff or others should be documented. Programs that use University vehicles or drivers must also comply with [University policies regarding drivers and vehicles](#).

## 5. Emergency Plans

Emergency plans, including guidelines for weather emergencies and for communicating and responding to UA Alerts must be documented and provided to all program staff. Emergency plans should be specific to the needs of youth participants. The [Youth Protection Program Emergency Plan Template](#) has been developed as a starting point that may be customized to cover a wide range of situations.

Each program or activity must also develop a plan for communicating pertinent emergency procedures to the Parent/Guardian of each program participant. The plan must include procedures for the notification of the minor's parent/legal guardian in case of an emergency, including medical or behavioral problems, natural disasters, or other significant program disruptions. Participants and their parents/guardians must be advised of these procedures in writing prior to program participation. Programs should request parent contact information and keep this information accessible for use in the event of an emergency.

## 6. Waivers

Each program participant and program staff member must complete and submit a [Youth Protection Program: Liability Waiver](#) form.

## 7. Medical Information and Medication Management

This document outlines the requirements for collecting and maintaining medical information and the requirements for medication management in all activities or programs included in the UA Youth Protection Program. For the purposes of this program, medical information can include all information related to health and wellness, and medication includes both prescription and over-the-counter items. Information regarding medical information requirements, security, and medication management procedures should be communicated to the parent or guardian of the youth participant in advance of the program.

Medical care will be provided to participants at the University Medical Center (UMC) during regular hours. If medical care is needed and University Medical Center is not open, participants should be transported to the nearest urgent care via 348-RIDE. Use of the DCH Emergency Room should be restricted to serious accidents or for illness that needs immediate attention, not for care that could be provided at UMC or at an urgent care clinic.

Program staff should accompany any participant who seeks medical attention without their parent or guardian. Regardless of the treatment location, the program staff should notify the parent or guardian upon making the determination to seek medical care.

### *Medical Information Management*

Depending on the nature and usage of the information collected, medical information can be covered by a variety of regulations, standards, or best practices. Regardless of the specific

standard, medical information is private, individually identifiable information, as should be treated as such. Access to these records should be restricted to the minimum number of people necessary. The records should be stored under lock when not in active use, and submitted to CERA for record keeping at the end of the program.

Programs of less than four (4) hours duration generally require minimal medical information, but this can vary depending on the program activities. If needed, a program can utilize the [Youth Protection – Medical Information Form](#) to collect information. Programs of less than four (4) hours do not handle medication. Programs of more than four (4) hours should collect medical information from participants. Overnight programs are required to have medical information and Medication Management programs as outlined in this Guide.

At a minimum, regardless of the length of time of the activities, each program shall have a plan for responding to accidents and emergency events, including communication to participants and their parents/guardians. These plans should be submitted to CERA with the program registration for review and approval in advance of participant registration. Once approved, each program director shall train their staff on these plans and ensure that they understand both their response and their reporting obligations. Programs should collect insurance information (front and back of medical insurance cards) so that the program can secure medical assistance for a participant should the need arise. These copies should be treated as medical documentation, kept in a secure location with the participants other medical information, and submitted to CERA for maintenance and disposal at the end of the program.

Programs of more than four (4) hours or that involve physical activities may need to collect more detailed information. In this case, the UA Youth Protection – Medical Information form is provided and should be used. In some cases, a program will need to document the review of more specific information than is collected by the Youth Protection - Medical Information form. If the Youth Protection –Medical Information form will not be used, the program should submit their proposed documentation to CERA at registration to allow for review. This review will need to occur prior to participant’s registering for the activity.

In addition, some programs, specifically athletics programs, may have other documentation related to possible accidents or injuries. These should be included with the registration to allow for a comprehensive review. As an example, the Alabama High School Athletics Association uses both the [Pre-participation Physical Evaluation Form](#) to document an athlete’s fitness to participate in interscholastic athletics and the [Concussion Information Form](#) to document their concussion protocols.

### *Medication Management*

In addition to the collection of medical information, programs of more than four (4) hours are expected to have procedures in place to meet the needs of youth participants who need to take medication or provide an equivalent set of procedures for review/approval prior to the beginning of the program. Any program of less than four (4) hours can choose not to allow medications as long as this is communicated clearly to the parents. No program, regardless of

length, can refuse to allow necessary medications, such as insulin, asthma inhalers, epi-pens, or other related items.

For programs of more than four (4) hours, at least two program staff members should be designated as the contacts for medication management. Both parents and participants must be advised in pre-camp communications who these staff members are, and that program staff will be taking up all medications during the duration of the program or activity (see Procedures). The only exceptions will be for inhalers, epi-pens, and other such rescue medication that should remain with the participant at all times. Contact CERA if assistance is needed with coordinating training for these medications. [Youth Protection Medication Management Forms](#) authorizing both prescription and over the counter medication should be submitted by the participant's parent/guardian in advance of the program.

### *Procedures*

Parents should place all over the counter and prescription medications for each youth participant in one plastic bag with their first and last name and date of birth written on the outside of the bag. As part of the drop off check in, all youth participants will be asked if they have any prescription or over the counter medications. If so, the medications should be submitted to the designated staff member(s). If youth participants do not have their medications in a bag, a bag will be made available. When the participant comes to the medication turn in table, the staff will review the medication information previously submitted on the program registration and ensure it matches the turned in medications. If something in the previously submitted information has changed (new medications, altered dosage, etc.), a new form must be submitted at check-in. The designated staff member will ensure the participant's medication bag has their name and date of birth on the outside and will add the room number and camp name on the outside. The bag should be maintained in a lock box for the duration of the program. The designated staff member should transport the lock box with them as needed and store it when not in use. Rooms used for storage, including dorm rooms, must be locked at all time when the staff member leaves the room to maintain the security of the medications.

Staff will hold the participant's medication bags and provide the medications to the participant as they need them. Because staff members for programs and activities subject to the Youth Protection Program are not licensed to prescribe or administer medications, they will only hold these medication bags and provide the bags to the youth participants when they need to take a medication. At no time will a staff member handle a bottle or the contents of the individual's medication directly; nor will any staff member provide guidance on how the medication should be taken. If the participant is unsure of the medication to take or correct dosage, someone on the program staff will contact their parent or guardian for clarification.

Program staff should review their participant's medication information to be familiar with when medications are needed. **It is the participant's responsibility to come to get**

**their medications, but staff should still be aware of when youth participants need the medications to remind them as needed.**

When a participant needs to take a medication, the designated staff member will give that participant's medication bag to the participant. **Ensure that the information given by the participant and the information on the medication bag match by asking the participant to provide their full name and date of birth; double check to make sure you do not give a participant another participant's medication bag. At no time will the staff handle the medication directly. The staff will never give any guidance on what medication to take or dosages.** If the participant is unsure of what medication to take, the staff will notify the Program Coordinator and someone will call the parent or guardian, if needed, to clarify medication for the participant.

Any time a participant is given access to their medication (only given by a designated staff member), ensure this is recorded on a [Medication Administration Record \(MAR\)](#). Prescription items should be taken according to physician instructions. Over the counter (OTC) medications should be taken according to the manufacturer's directions. While it is not usually necessary to follow up on prescription items, OTC may require some follow up. Depending on the need that precipitated the OTC medication, that leadership team member may check on the participant after one hour to see if the medication has alleviated the symptoms; if this is done, follow up information is recorded on the MAR. If the participant's condition has not improved or has worsened, notify the Program Coordinator to determine the next actions to be taken and contact the participant's parents. All designated staff members will keep their MAR forms for the duration of the program and then turn in to the Program Coordinator at the end of the program. The Program Coordinator will turn in all residential MAR's to CERA.

All medications and medication bags will be returned to the participant's parent/guardian when the program is over.

## **8. Accommodating Special Needs**

Standards must be established for reasonably accommodating minors with special needs. These include, but are not limited to, the modification of policies, practices, and procedures, effective communication prior to and during the program for minors and the removal of physical or communication barriers to programs, activities, goods or services. Programs must provide ample time for participants to disclose any reasonable accommodations they may need during their participation in the program. Programs must communicate contact information for a specific individual responsible for the identification of reasonable accommodations.

For questions or assistance with securing reasonable accommodations, contact Compliance, Ethics, and Regulatory Affairs.

## 9. Third Party Programs

There are special considerations for programs managed by third-party entities, but hosted in UA facilities. These entities are subject to University policies including the [Youth Protection Policy Governing Activities or Programs with Minor Participants](#), the [Child Protection Policy](#) and the [Facilities and Grounds Use Policy](#). A UA faculty or staff member must be designated as the coordinator for any third-party youth activities or programs.

### *Insurance*

Third-party entities must provide an insurance certificate which details the coverage for the program. Consult the [Insurance for Third Party Programs](#) webpage for more in-depth information.

### *Contracts*

The [Child Protection Addendum](#) must be added to any contracts with third party entities for services or programs which involve youth participants.

### *Waivers*

Each program participant and program staff member must complete and submit a [Youth Protection Program: Liability Waiver for 3<sup>rd</sup> Party Programs](#). This is a different version from the one required for UA sponsored programs.

## 10. Parent Communication

Communication and parent information packages must address the following:

- a.) Detailed agenda;
- b.) Procedures for managing any medications that may be needed by the participant during the program or activity;
- c.) Personnel identification to be worn by Program Staff;
- d.) Drop-off and pick-up procedures;
- e.) Curfews (if overnight);
- f.) Code of conduct for participants;
- g.) Prohibitions on the use of alcohol, tobacco, and non-prescribed drugs;
- h.) Appropriate supervision, which, among other things, includes proper supervisor-to-participant ratios;
- i.) Program contact information for parent use.

If internet access is provided to the participants, parents should be notified that there are no restrictions placed on the content.

### III. Registration and Approval

University departments sponsoring activities or programs for or including minors must maintain an up-to-date listing of those programs. Such lists should include each program's dates, times, locations, attendance (including age range and number of participants), and the contact information for the Program Director. All activities or programs for or involving minors must be registered and final approval received before program activities begin. Registration for ongoing and pre-established activities or programs for or involving minors must be completed annually prior to the beginning of the University academic year. Registration for other activities or programs for or involving minors should be completed no less than eight weeks in advance when possible, but must be completed and approved before an activity or program for or involving minors begins.

Required documentation to initiate the registration and approval process includes:

- A complete description of the activities and a planned itinerary must accompany the registration. Include any additional information, documentation or waivers required for program activities.
- A complete listing of Program Staff must accompany the application. Individuals under the age of 19 should be identified on the registration form. Parent/Guardian email addresses should be provided for Program Staff under the age of 19. Training completions and background checks will be verified to ensure compliance.
- For third-party programs, an insurance certificate will be required.
- Registration forms should identify which program staff member will be responsible for keeping/administering medication or handling illness/injury.
- A copy of all previously mentioned guidelines and communication plans (see section II).

All documents will be reviewed by appropriate UA departments as needed. Reviews will be accomplished via an electronic routing process to maximize efficiency. Final approvals will be provided to the UA Program Sponsor via email.

### IV. Program Staff

All program staff must complete training and background checks in order to be cleared to work with youth participants. Program staff may include faculty, staff, students, or volunteers regardless of whether or not they are paid for the services that they provide to the program.

Once the registration form is submitted, the list of program staff will be evaluated. If the program staff member has not completed training in the 12 months preceding the start date of the program, they will receive an email from [youthprotection@fa.ua.edu](mailto:youthprotection@fa.ua.edu) that contains links for them to access their training and authorize their background check.

## 1. Training Requirements

All program must complete training on the following topics:

- The University of Alabama Child Protection Policy
- Medical & Emergency Information for the UA Campus
- Jeanne Clery Campus Security Policy & Crime Statistics Disclosure Act

Training for youth program staff is delivered via DocuSign. Upon completion, program staff will receive a copy of the training documents for future reference.

## 2. Background Checks

Program staff must have a federal, state, and sex offender background check. The Youth Protection Program uses the same vendor for background checks as Human Resources, but the level of information requested is not the same.

College and unit activities or programs for and involving minors can require background checks on broader categories of individuals than those who are likely to have responsibility for the care, custody, or control of a minor as part of an activity or program, provided there is a business justification, that checks are made consistently across specific positions and that the process and the results of individual background checks have been approved. Units must perform background checks on broader categories of individuals if required by law.

- A background check must be completed every year to remain eligible to work in activities or programs for and including minors.
- College and unit activities or programs for and including minors must perform background checks on applicable individuals more frequently if required by law.
- Program Staff age 19 or under must successfully complete a Personal Reference Check in place of a criminal background check. Parental consent must be given before UA can perform checks on individuals under the age of 19.
- Records must be kept consistent with the unit's record keeping and the university Records Retention Schedule.
- Contracts with Third Party programs shall include, as a provision of the contract, the requirement that staff or volunteers affiliated with the program submit information needed for UA to complete required background checks in accordance with this policy and established UA procedures OR provided information or verification that background checks on staff provided by a Third Party have been completed to equivalent standards.

Criminal convictions, deferred adjudications and/or sex offender background checks that return any offense could *potentially* disqualify a person from being employed by or assigned to a program or activity involving minors. Any areas of concern will be forwarded to Compliance, Ethics, and Regulatory Affairs for review with appropriate University officials. In the event that the University officials restrict a person from working with minors, this restriction will be communicated to the UA Program Contact.

Faculty, staff, students, student employees, graduate assistants, contractors, or volunteers must self-disclose felony or misdemeanor convictions that occur after hire/appointment within three (3) business days after conviction, according to UA policy.

### 3. Counselor to Participant Ratios

Counselor to participant ratios should conform to the ratios listed below. Programs or activities involving minors with a small (less than 5) number of participants should have a minimum of two individuals responsible for oversight. In large groups of participants, programs may need to provide additional staff for the oversight of youth participants, depending on the intended activities. Regardless of the number of participants, at least 80% of the counselors must be age 18 or older.

<b>Youth Participants</b>	<b>Ratio of Program Staff: <i>Overnight</i> Youth Participants</b>	<b>Ratio of Program Staff: <i>Day-only</i> Youth Participants</b>
<b>5 years and younger</b>	1 staff for every <b>5</b> participants plus one additional staff.*	1 staff for every <b>6</b> participants plus one additional staff.*
<b>6–8 years</b>	1 staff for every <b>6</b> participants plus one additional staff.*	1 staff for every <b>8</b> participants plus one additional staff.*
<b>9–14 years</b>	1 staff for every <b>8</b> participants plus one additional staff.*	1 staff for every <b>10</b> participants plus one additional staff.*
<b>15-18 years</b>	1 staff for every <b>10</b> participants plus one additional staff.*	1 staff for every <b>12</b> participants plus one additional staff.*

\*see paragraph below for additional explanatory information

All program staff ratios should conform to guidelines from the American Camps Association, plus 1 additional staff member, meaning that programs should maintain one additional staff number over the number required by the above listed ratios.

#### Examples:

- a.) A day camp of 10 year olds with 5 participants would require 2 staff members at all times.
- b.) A day camp of 10 year olds with 50 participants would require 6 staff members (1:10 ratio means 5:50 so 5 staffers plus one additional for a total of 6 staff members).
- c.) An overnight camp of 15 year olds with 1000 participants would require 101 staff members (1:10 ratio means 100:1000 so 100 staffers plus one additional for a total of 101 staff members).

For assistance with determining the appropriate numbers of Program Staff or questions regarding staffing requirements, contact Compliance, Ethics, and Regulatory Affairs.

## 4. One-on-One Interactions

One-on-one interactions may take place only in open, well-illuminated spaces or rooms observable by other adults from the activity or program.

## V. Managing the Unexpected

Even with the best planning, unexpected issues may arise.

### 1. Injuries, Incidents or Accidents

Incidents and accidents can include such things as: minor to major physical injuries of participants and/or counselors; behavioral issues among participants, counselors, or visitors; hospital/doctor visits; violent or potentially violent behavior; the possession or use of alcohol or other drugs; inappropriate physical contact; or violations or potential violations of UA policy.

Emergencies, including emergency medical situations, should be reported to UAPD at 205-348-5454.

Any incidents, accidents, or injuries occurring during a program or activity for or including minors should be reported to UA according to established policies, including:

- Those involved should submit a General Incident Report using the [General Incident Report](#) form.
- Employees who are injured during working hours should submit an [On the Job Injury Form](#).
- Student/Non-Employee Volunteer injuries should be submitted using the [Student/Non-Employee Injury Report](#).
- Any issues that are not addressed under these policies should be reported to UAPD (348-5454).

In addition to any other reporting or incident documentation, the UA Program Contact or Program Director should report any accidents/incidents to Compliance, Ethics, and Regulatory Affairs as soon as possible. If consultation regarding reporting is needed, or if there are questions on the process or other support needed, please contact Compliance, Ethics, and Regulatory Affairs.

### 2. Abuse or Neglect of a Minor

In accordance with the UA Child Protection Policy, if you become aware or suspect that a child is a victim of child abuse or neglect, ***you must act***.

In deciding whether or not to report an incident or situation of suspected abuse or neglect, it is not required that you have proof that abuse or neglect has occurred. Any uncertainty in

deciding to report suspected abuse or neglect should be resolved in favor of making a good faith report.

In making a report, your actions should be as follows:

1. **Immediately** report the information to The University of Alabama Police Department at **205-348-5454**.

Your oral report should include *all available information* regarding the known or suspected abuse or neglect, including, but not limited to: the name of the child, the child's whereabouts, the names and addresses of the parents, guardian, or caretaker for the child, and the character and extent of the injuries. The report should also contain, *if known*, any evidence of previous injuries to said child and any other pertinent information that might establish the cause of such injury or injuries, and the identity of the person or persons responsible for the same. However, you should not delay making a report to gather this information.

2. Do not directly question or solicit information from the child or from the person suspected of improper behavior. Likewise, do not delay making a report to gather evidence. That is not your role; the role of investigation lies with city, county, and state officials.
3. In addition to making an oral report, you must also complete a [Child Abuse or Neglect Report Form](#) and deliver the same to the UA Police Department. It shall be the responsibility of the UA Police Department to notify University officials of the suspected child abuse and to coordinate the investigation with local law enforcement. University officials include, at a minimum, the President, Provost, Vice President for Financial Affairs, General Counsel, Executive Director for Institutional Compliance, and Director of Risk Management. It shall be the responsibility of the University President to notify the Board of Trustees of the incident. Further, it shall be the responsibility of the UA Police Department to either report the incident to the State of Alabama Department of Human Resources or to ensure that the local law enforcement agency has made the report. The UA Police Department shall advise the reporter that such report has been made. Finally, the UA Police Department shall be responsible for maintaining all records and reports related to the incident and to brief university officials as needed.

## VI. Wrapping Things Up

The statute of limitations for participants who wish to report abuse doesn't start until they reach the age of majority (19 in Alabama), so that means that the window for potential lawsuits could stretch out for many years. That means that it is very important that records are kept and maintained in a manner that would make them easily accessible, if needed.

At the conclusion of the activity or program, submit the following items to [youthprotection@fa.ua.edu](mailto:youthprotection@fa.ua.edu):

- Final list of participants;
- Copies of all waivers and medical documentation including medication forms, physician's instructions, or medical clearance forms; and
- Records of any incidents, injuries, or accidents that may have occurred during the activity or program.

## VII. Accountability

Individuals violating this UA policy or the requirements of this Guide will be held accountable for their actions, which may include, but are not limited to:

- Volunteers are subject to reprimand or loss of volunteer status;
- Students are subject to the Code of Student Conduct;
- Faculty, staff and student employees are subject to corrective action up to and including termination;
- Unit level sanctions, and;
- Third party providers are subject to punitive actions under the terms of their contract agreement, up to and including termination of contract.

Site visits may be coordinated by Compliance, Ethics, and Regulatory Affairs to promote compliance. Any suspected violation of approved program guidelines or University policy will be subject to investigation by the appropriate University officials. Colleges, units, and individuals must participate in site visits as required.

## VIII. Reporting and Investigations

Cases of known or suspected child abuse or neglect should be reported in accordance with the UA [Child Protection Policy](#). Investigations of allegations of child abuse or neglect will be conducted in accordance with the investigatory protocols of children service agencies, local law enforcement agencies, and/or the University.

These guidelines do not have the force and effect of law. Moreover, these guidelines do not impose a duty on any University of Alabama official. They are not intended to be a set of inflexible requirements, nor are they intended to limit the appropriate discretion of officials as warranted by the individual circumstances of a particular individual or situation. Further, the University may unilaterally amend this Guide as needed and without notice.

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