Youth Protection: Centralizing a Decentralized Process

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Abstract

The University of Alabama hosts programs and activities that draw tens of thousands of youth participants in a given year. These programs come with risks and concerns that differ from programs offered for college-aged students. The University's decentralized approach to managing these concerns was a stumbling block for program directors and contributed to inconsistency in compliance with established policies. Reviewing departments were frustrated because they were not always aware of programs being offered.

By engaging stakeholders from both sides of the table, the Office of Compliance, Ethics, and Regulatory Affairs created a synergistic approach to addressing youth program concerns. A group of representatives from long-established youth programs worked together with representatives from reviewing departments to develop a new policy and registration process that would be beneficial to all.

The end result is a more efficient, streamlined process that provides improved visibility for all involved while ensuring that records are retained in a central location.

Introduction of the Organization

The University of Alabama (UA), the state of Alabama's oldest public university, is a senior comprehensive doctoral-level institution. The University was established by constitutional provision under statutory mandates and authorizations. Its mission is to advance the intellectual and social condition of the people of the state through quality programs of teaching, research and service.

Enrollment at The University of Alabama reached a record high of 38,563 for fall 2017, up more than 2 percent from last year's record class of 37,665. More than 40 percent of UA's 7,407-member freshman class scored 30 or higher on the ACT, and 38 percent were in the top 10 percent of their high school graduating class. The entering class in 2017 carries an average high school grade-point average of 3.72, with 34 percent having a high school GPA of 4.0 or higher.

Statement of the Problem/Initiative

Throughout the year, the University hosts many outreach programs, enrichment activities, and summer camps for youth participants. While these programs support UA's mission and function as the primary avenue for recruitment for some departments, the risks that come with accepting the responsibilities of care, control, and custody of minors must be addressed. The resources available were decentralized and often overlooked, and program directors had to navigate their way through several independent review processes. Several of the directors were inexperienced with planning youth programs and were not aware of all the risks involved or the steps necessary to mitigate them. As a result, many of the programs offered were not fully compliant with University policy.

The effort expended by program directors was out of proportion to the programs and activities that they were planning. The time investment required to navigate the bureaucracy was staggering. Program directors were required to clear hurdle after hurdle to make it through all of the forms and processing lead time requirements. Program directors could spend several weeks trying to get the permissions that they needed for an activity that would only last a few days at most.

Additionally, many of previously written policies and procedures were not written with children in mind. Instructions that are appropriate for 19-22 year old college students aren't always appropriate for 5-18 year old youth camp participants.

Design

The first step in developing a cohesive process was to identify all of the departments that needed to be part of the review and coordinate their efforts. To this end, the Office of Compliance, Ethics, and Regulatory Affairs (CERA) created a working group comprised of representatives from each of the reviewing departments as well as directors from some of the long-standing youth programs. Together, this group was charged with the tasks of defining the scope of the new Youth Protection Program, developing policy, creating supporting reference material, and coordinating conversations with all areas and divisions of campus to raise awareness and encourage support prior to submitting the policy for approval.

Key requirements of the policy include:

- Programs for or involving minor participants (under the age of 19 in the state of Alabama) are required to register.

- Exceptions were granted for enrolled students, public events, and research conducted with IRB approval.

- Program staff must pass a background check and complete training on youth protection, Clery Act, and emergency medical procedures.

- Program directors must provide documentation including: detailed agendas, insurance certificates, emergency plans, transportation plans, housing agreements, parent communication, and liability waivers.

CERA worked with Financial Affairs Information Technology to create an online registration process, establish an automated approval workflow to ensure that the appropriate departments would be notified, and create a document repository where records could be stored. The workflow began with a review by CERA to ensure that all basic requirements are met and to initiate staff training and background checks then it moved on to Human Resources for review of background check results, Risk Management for a review of insurance documentations, Human Resources Learning and Development for verification of training, and the UA Police Department where staff are reviewed for pending cases and trespass records. Next, Emergency Preparedness and Grounds Use are notified, and the registration returns to CERA for final approval, upon which, the Clery and Title IX offices are notified.

After the initial planning was completed, the working group was transitioned into a standing Youth Protection Steering Committee. At this time, the membership of the group was re-assessed to ensure balanced representation from youth programs as well as the reviewing departments and to allow for changes in representation to bring in individuals who would be best suited for the ongoing work of the committee.

Implementation

The implementation began with a soft rollout phase in Summer 2017 where specific programs were invited to register and work through the process before the policy was in effect.

Program directors were instructed to provide the documentation that they already had in place. This allowed a window where programs could get feedback on their processes and documentation and CERA got better visibility into the current status of youth program compliance.

Throughout the summer, word spread organically through campus, resulting in a total of 51 programs registered in two months. Those programs came with a combined total of over 8,000 youth participants. CERA's 3 FTEs initiated 1,030 background checks, recorded 838 trainings, and provided ongoing support and reporting to the program directors. The UA Police Department identified 1 individual who was declined to work in our program.

At the end of the soft rollout, program directors and workflow reviewers were invited to participate in an anonymous survey and a follow up in-person focus group session. Through this debriefing, CERA was able to create a list of enhancement requests to be incorporated in the final version of the registration process.

Benefits

The benefits associated with the newly developed Youth Protection Program are numerous, but first and foremost is the increased efficiency for those seeking to register a youth program. Previous to this program, it required consultation with 8-10 different departments to determine all of the required items, and now program directors have a central location where they can manage the whole process. This by itself has been the motivation for many programs to come onboard.

Before this program, consistency between programs was virtually non-existent. Each had their own process for training and verifying staff, documentation varied widely, and document retention was spotty at best. The University can now be sure that anyone working with children

on our campus has been appropriately vetted. While there is still room for improvement, the central registration process will be the catalyst for change.

The registration process gives the University better visibility into what programs are being offered, how many participants are involved, and what staff are involved. This data can be used for planning resources and coordinating efforts.

Centralized retention of documentation simplifies the process of locating information in the event of a complaint. Understanding the extended statute of limitations for claims involving minors, the Office of Counsel has been very involved in helping to create a structure that will serve the University well if claims crop up years in the future.

Finally, the implementation of the Youth Protection Program has opened the door for two-way conversations and improvements across the board. CERA has been afforded the opportunity to visit many faculty and staff meetings, and that face-to-face contact provides a foundation for mutual respect and rapport to develop.

Retrospect

Throughout the implementation phase, the explanation that bumps and snags were expected in a new process became a mantra. Conversations with newly registered program directors often began with an explanation that we were feeling our way through this together, and that openness seemed to diffuse the tension when things didn't always turn out according to plan and helped encourage open communication.

CERA maintained records manually during the soft rollout. This meant that there was a mountain of data entry involved in ordering background checks and assigning training. It also meant that providing status update reports to the program directors was an onerous process. Despite the frustration, managing the recordkeeping by hand provided a better understanding of

the process, and those experiences were invaluable in forming the plan for a more permanent solution as CERA worked with Financial Affairs Information Technology to create automated solution for compiling staff information and making it available to program directors.

It became apparent that program directors were often unprepared to provide certain types of documentation and unsure about what to expect next. To make things a little easier for them, templates with language pertaining to children were developed, including a customized emergency plan and liability waiver. Additionally, a documentation checklist was provided. To help standardize routine communications, a library of stock emails to be sent at specific points in the workflow is being established.