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Foundations for building youth protection compliance programs in higher education

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In a movement that began more than 30 years ago to enforce ethical practices in corporate settings,^[1] growth continues within organizations today as centralized departments are responsible for promoting a compliant and ethical culture. Most recently, this movement is evident in the higher education environment. For example, in 2013, there were only a handful of centralized, university-wide ethics and compliance units within the Big Ten Academic Alliance (BTAA). Six years later, these programs are still evolving.

The Pennsylvania State University established the Office of Ethics and Compliance in 2013 in response to recommendations from the *Report of the Special Investigative Counsel Regarding the Actions of The Pennsylvania State University*.^[2] A key position created within this Office was the youth program compliance specialist. In 2017, Michigan State hired a person to promote and support the protection of minors in university youth programs. At this time, all institutions in the BTAA reportedly have individuals in place to oversee youth safety initiatives. This is largely due to the recognition that institutions of higher education often serve more minors on campus than undergraduate and graduate students combined. Between Penn State University and Michigan State, more than 500,000 minors participate in programs, activities, and services designed for children.

Although not all youth protection professionals report to a compliance program, responsibilities of all positions include oversight of university's policies and procedures for programs that include non-student minors. For many, the most logical place to start is using key criteria for establishing an effective compliance program.^[3] Focusing on some, or all, of the elements of an effective compliance program brings structure to building a system and culture to promote a safe environment for the children served by colleges and universities across the nation. In this article, we will provide an overview of each of the elements of effective youth protection programs through a lens of ethics and compliance management.

Policies and procedures

A strong foundation of an effective youth protection program requires policies and procedures that set institutional standards and guide the management of youth programs. When developing policies and procedures, it is important to integrate requirements that align with local, state, and federal laws. Professional standards also play a key role in the development of policies. For youth protection, key professional standards to consider include those outlined for corporate compliance, K-12 education, child care, and camp management. It is important to pay attention both to state laws and practices promoted by national organizations, including the American Camp Association and the Higher Education Protection Network.

To ensure the proper management of youth programs that promote a culture of safety, policies for working with minors must outline all compliance standards for program management (e.g., hiring practices, including

clearance requirements, staff training orientation topics, and expectations for adequately supervising minors). It is also critical to include required registration forms, such as release of liability, photo releases, and consent for medical treatment.

To define who is ultimately responsible for programs serving children, youth protection policies and standard operating procedures must explain who is permitted to conduct youth programs on behalf of the institution or in the institution's facilities. Some institutions allow only programs sponsored by the institution, while others allow a third-party organization to operate at the institution's facilities. It is also common for institutions to allow both internal and external programs. In each of these instances, youth protection policies must explain the process and criteria for approving youth-serving programs and activities.

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