PRINCETON UNIVERSITY

Supplemental Guidance to the Policy for Programs Involving Minors
Virtual Programming
Minors Oversight Committee – Effective May 4, 2020

Princeton University is committed to upholding its policies and standards for programs involving Minors, regardless of whether such programs are in-person or in a virtual environment. In response to social distancing requirements and the transition to online instruction nationwide in response to COVID-19, the Minors Oversight Committee (MOC) has created this Supplemental Guidance for Virtual Programming to aid in the execution of virtual programming in compliance with the Policy for Programs Involving Minors. Any programs involving Minors that wish to shift their programming to a virtual platform must adhere to this Supplemental Guidance. **In light of the rapidly changing environment, the MOC reserves the right to modify this Supplemental Guidance as appropriate.** Capitalized terms used but not defined in this Supplemental Guidance have the meanings set forth in the Policy for Programs Involving Minors.

Existing Programs	• Existing programs that were registered on minorsoncampus.princeton.edu as of March 6, 2020 must contact kkueny@princeton.edu if they wish to shift their programming to a virtual platform. • New Program Staff for existing Covered Programs moving to a virtual program must follow the Standards of Behavior with Minors while also following the Policy for Programs Involving Minors, including completion of a University-provided background check and online-training. • New Program Staff for existing Non-Covered Programs moving to a virtual platform must follow the Standards of Behavior with Minors while also following the Policy for Programs Involving Minors.

New Virtual Programs	• Any new program that wishes to conduct virtual programming must register on minorsoncampus.princeton.edu. It must be noted in the 'additional comments' section of the registration that the program will be conducted virtually.
	• Virtual programs can be registered as a Covered Program or a Non-Covered Program. Their descriptions, as outlined in the Policy for Programs Involving Minors, are as follows:
	  • **A Covered Program** is any program or activity operated or conducted by the University, whether on or off campus, including overnight or daytime stays, where the care, custody and control of Minors is the responsibility of University faculty, staff, students or volunteers. Covered Programs include but are not limited to outreach and community service activities.
	    • Under a Covered Program, all Program Staff must follow the Standards of Behavior with Minors while also following the Policy for Programs Involving Minors, including completion of a University-provided background check and online-training.
	  • **A Non-Covered Program** is a program organized by Princeton University for Minors but the care, custody and control of the Minor is not the responsibility of Princeton faculty, staff or students. Examples of such programming include:
	    - Any event or activity where parents/guardians or Chaperones are explicitly required to be actively present alongside their Minor participant;
	    - Admitted or prospective student programs.
	  • Under a Non-Covered Program, all Program Staff must follow the Standards of Behavior with Minors while also following the Policy for Programs Involving Minors.
	  • While Program Staff for Non-Covered Programs are not mandated to complete background checks and University-provided training, Non-Covered Programs still maintain an obligation to protect the safety of their participants.
	• Any new program is required to be sponsored by an academic or administrative department.
	The following two requirements do not affect or impact the ability of Princeton faculty, staff or student volunteer to volunteer with outside organizations as individuals:
	• Individuals wishing to conduct virtual community outreach/support to Minors on behalf of Princeton University must be listed as Program Staff in a registered program.
	• Individuals may not register themselves as a 'program.'

Rules of Engagement	In addition to the Standards of Behavior with Minors, virtual programming participants must understand and adhere to the following safeguards:
	• 1:1 interaction between Program Staff and Minor participants is prohibited.
	    • Virtual programs for individual Minor participants must arrange to have at least two Program Staff online at all times, including one serving as the designated host/monitor of the sessions. For Covered Programs, both Program Staff members must be background checked and trained.
	        - Due to COVID-19 and the possible delay of background check completion, 1 of the 2 Program Staff present must already have successfully completed their background check within 12 months of the virtual program start date, while the other must submit a background check prior to the virtual program start date.
	    • Virtual programs for groups of Minor participants can be led by a single Program Staff member as long as the session has more than two (2) Minors present at all times. For Covered Programs, the Program Staff member must have successfully completed the University-provided background check and online-training prior to the program start date.
	• Program Directors, the individuals overseeing the entirety of the program, must collect completed and signed Consent and Waiver Forms in a form approved by the University from each parent/guardian of Minor participants. The form must require the parent/guardian's contact information and provide an opportunity to request disability-related accommodations sufficiently in advance of the program start date so that Program Staff can plan accordingly in advance of the program. Information about creating accessible online content can be found on the Digital Accessibility website and the Office of Disability Services can advise on other types of accommodations.
	• Unregistered individuals cannot accompany registered Minor(s) participants in the virtual programming, i.e., friends or siblings.
	• Communications between Program Staff and Minor participants is restricted to program-related business purposes and is limited to official communication channels such as a Princeton University Zoom account or Princeton University email. The parent/guardian of the Minor participant must be cc'd on all written communication between Program Staff and the Minor participant.
	• Program Staff and Minor participant contact outside of the virtual program is prohibited, unless as outlined above. Program Staff and Minor participants are prohibited from following each-other on any social media platform or exchanging any personal contact information such as cell-phone numbers, etc.
	• Program Staff and Minor participants are prohibited from taking recordings or photographs of any virtual programming. If a Program Director believes it is necessary to record a session, they must obtain written permission from the MOC.
	• All virtual programming must utilize Princeton University's licensed Zoom video conferencing platform as a means of meeting. Below are additional Zoom requirements:
	    • Program Directors are the only individuals that can provide Minor participants and their parent/guardians with the Zoom meeting information (including the video conferencing link).
	    • Program Staff, Minor participants and their parents/guardians are prohibited from inviting or sharing Zoom meeting information (including the Zoom video conferencing link) with anyone who is not a registered participant of the program.
	    • Program Directors must lock the ZOOM Video Conferencing room once the virtual programming has begun, as to protect the program from ZOOM hacking or outside interruptions.
	    • Program Directors must disable the private chat feature on ZOOM Video Conferencing prior to the start of the virtual programming.
	    • Program Directors must disable participant screen share feature on ZOOM Video Conferencing prior to the start of the virtual programming.
	    • Program Directors may utilize Zoom breakout rooms for virtual programs for groups of Minors, provided each breakout room contains two (2) or more Minors for the duration of the session; 1:1 interactions are prohibited.
	    • Program Directors should instruct Minors to only use their first name and last initial in their Zoom video image (e.g, John D.).
	    • Program Directors should discourage all participants from setting inappropriate background images on their Zoom account.
	• Where possible, Program Directors are encouraged to set up specific dates and times for virtual programming, and to avoid spontaneous video conferencing.
	• Program Directors may delegate their responsibilities to a Program Staff member who has been trained and successfully passed a background check, after consultation with the Event Compliance Manager. Such a delegation of authority must be documented as a part of the registration.