



# UNIVERSITY OF SAN FRANCISCO

## PROTECTION OF MINORS POLICY

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Last Updated: May 1, 2025

Responsible University Officer:  
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Policy Owner:

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### POLICY STATEMENT

University of San Francisco (“University”) permits specified minors on campus for a variety of reasons including as prospective students; as enrollees in a University-sponsored program or camp; and as participants in certain other University-sponsored programs (some of which meet off-campus).

In all cases, the programs involving minors on campus, whether conducted by the University or an external entity, must include appropriate adult supervision to provide for their safety.

Departments may establish more protective-for-minors procedures than those included in this Policy if desired.

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## REASON FOR POLICY

This Policy establishes the standards for the protection of minors participating in a University-operated or sponsored program or an activity. The Policy also complies with California Penal Code Section 11164-11174.3, the Child Abuse and Neglect Reporting Act (**CANRA**), and related state laws governing the protection of minors, such as Assembly Bill (AB) 506 and Assembly Bill (AB) 2669.

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## WHO SHOULD READ THIS POLICY

The department head of any employee, student, or regular volunteer who works in a program that allows minors on campus; the members of the Leadership Team; as well as supervisors and Business Managers who supervise an individual with such responsibilities. This policy also applies to third-party contractors. Non-University organizations and entities that operate programs or activities involving minors on campus must also comply with this policy (see [Criminal Background Check Verification Form](#)).

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## POLICY TEXT

The University is committed to promoting the safety of students and others who visit our campuses, especially minors. This policy describes requirements to engage with minors to promote their protection, while visiting our campus or in a University-related program, and to fulfill our obligations as mandated by law under The California Child Abuse and Neglect Reporting Act (“CANRA”). CANRA outlines ways to protect minors while under the supervision of persons providing services to youth. CANRA defines the individuals that are considered a “mandated reporter” as well as the steps required to report child abuse/neglect.

CANRA states that employers or administrators of an educational institution who have “regular contact” with minors are defined as “mandated reporters”.

As of September 6, 2022, AB 506 defines “regular volunteer” as “a volunteer with the youth service organization who is 18 years of age or older and who has direct contact with, or supervision of, children for *more than 16 hours per month or 32 hours per year.*”

All mandated reporters are required to report suspected child abuse or neglect, including, but not limited to, the following:

- Physical injury inflicted by other than accidental means,
- Sexual abuse or exploitation,

- Willful endangerment,
- Unlawful corporal punishment, and
- Other maltreatment.

See **FAQ #2** for additional information on the types of child abuse and neglect that are reportable under CANRA.

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## REQUIREMENTS FOR INDIVIDUALS WHO WORK WITH MINORS

All employees, students, and regular volunteers authorized by the University to regularly work in a University-sponsored program, including the supervisors of such individuals, are treated as Mandated Reporters under this Policy. Such individuals must meet the following requirements prior to working in the program and annually thereafter:

- Fill out the [Minor's Registration Form](#)
  - Please fill out the Minors Registration Form to provide details of the program involving minors. The completed form will be routed to the Risk Management office for review and approval. Please expect a 5-10 day turnaround.
- [“Protecting Children: Identifying and Reporting Sexual Misconduct”](#) United Educators Training (branch code: 442-88956)– Successfully complete online training
- Live Scan / Fingerprinting – Fill out “Request for Live Scan Service” form, then authorize and successfully complete fingerprinting
- [CANRA Acknowledgment to Report Child Abuse Form](#) – Complete and sign CANRA form confirming the individual’s responsibility to report any known or reasonably suspected abuse or neglect of a minor, and (does not include students without compensation or volunteers that are not considered “regular volunteers.”)
- [CANRA Training Video](#)
- [Criminal Background Check Verification Form](#) (third parties only) – Complete and sign form required for third parties utilizing University facilities for programs or activities involving minors.

University Departments are responsible for ensuring that these requirements have been satisfied with respect to any person authorized to regularly work in a program involving minors. Copies of completed forms and other substantiating documentation must be retained by departments for audit purposes for a minimum of three years. After three years, University departments must contact the Department of Public Safety to obtain consent to no longer retain documentation. Third-parties using University facilities for programs or activities involving minors may be asked to provide proof of training and fingerprinting upon request for audit purposes.

## CANRA/Mandated Reporters

Employees (including faculty members, other academic personnel and student employees) and other administrators whose duties bring them into contact with minors on a regular basis, or who supervise others with such duties, and regular volunteers are Mandated Reporters for child abuse or neglect occurring on the University's premises or at official University activities or programs. Examples of Mandated Reporters are listed in Appendix A.

Volunteers who are not considered "regular volunteer" Mandated Reporters are still encouraged to complete the reporting [training](#) and report any suspected instances of child abuse/neglect.

Third-party contractors do not have the same civil and legal penalties if there is a failure to report under CANRA, however; the University expects third-party contractors to act as a Mandated Reporter.

Students providing services on behalf of the University without compensation are not treated as Mandated Reporters unless the student is considered a "regular volunteer" and whose duties bring them into contact with a minor for 16 hours per month or 32 hours per year. If a student is an employee of the University, and their duties bring them into contact with minors on a regular basis, they will be considered a Mandated Reporter.

CANRA requires that employers of Mandated Reporters promote the identification and reporting of child abuse or neglect. The University requires that all University employees, administrators, and regular volunteers who are Mandated Reporters make required reports to child protection or law enforcement agencies; and more broadly to encourage *all* members of the University community who observe, have actual knowledge of, or reasonably suspect child abuse or neglect at a University facility or perpetrated by University personnel to promptly report the concern to appropriate external and University officials.

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## CANRA REPORTING REQUIREMENTS

Mandated Reporters have a legal responsibility to report known or reasonably suspected child abuse or neglect, as follows:

1. **First Report: Reporter shall make a verbal report immediately or as soon as practicable to any of the following: local law enforcement, child protective services or county welfare departments.**
  - a) Law enforcement
    - San Francisco Police Department: (415) 553-0123
      - San Francisco Police Department Text a Tip: 847411
    - San Francisco Sheriff Department: (415) 554-7225
  - b) A list of Child Protective Services hotlines across California can be found [online](#).

- c) A list of County welfare departments [can be found on the California Department of Social Services website](#).

Even where the abuse may have occurred in another state, your only obligation is to call one of these local or county agencies. It is the agencies' responsibility to refer the matter to the appropriate extra-state authorities.

- d) Reporters shall then make an internal report (can be anonymous) to their supervisors, through the University's Whistleblower Hotline **1-800-316-4315**, Public Safety, or a [University officer](#). Supervisors who receive reports should promptly forward those to a [University Officer](#) or to the University Whistleblower Hotline to be made anonymously. An internal report is not a substitute for a Mandated Reporter's required external reports under CANRA or other applicable laws.

*It also is the policy of the University to require all employees (without regard to Mandated Reporter status), volunteers, students, and third party contractors to immediately report in writing to Public Safety or a [University officer](#), any known or suspected child abuse or neglect that occurs on campus, in any off-campus University building or property, or in connection with any University-related program or activity in a manner consistent with this policy.*

2. **Second Report:** The verbal report must be followed within 36 hours by a written report to the law enforcement or child protective agency that the initial report was made to and will be investigating the incident. The investigating agency will ask you to complete the **Suspected Child Abuse Report, Form 8572**.

**Failure to Report to USF-** If an employee fails to report suspected sexual abuse of a minor, this may result in disciplinary action, including termination, consistent with applicable [University policies](#).

**A Mandated Reporter who fails to execute their legal obligations to report may be subject to criminal penalties including fines, imprisonment or both under [Section 11166c of CANRA](#).**

- Misdemeanor or punishable by up to six months in jail,
- A fine of \$1000,
- Or both.

No University supervisor, administrator, or other employee may inhibit the duty of a Mandated Reporter, or other individual subject to this Policy, from reporting suspected/known child abuse. A supervisor or administrator who impedes, inhibits, or sanctions a Mandated Reporter for filing a mandated report may be fined up to \$5,000, imprisoned for not more than 1 year, or both where abuse and neglect result in death or great bodily injury. Any retaliation initiated against a reporter of child abuse or neglect will be addressed promptly, in accordance with the University's [Whistleblower Policy](#) or [Retaliation Policy](#).

What information should you give and what information should you request of the reporting agency:

**1. Call immediately or as soon as possible**

- Give the agency as many details as possible
- Tell them that you are a Mandated Reporter at the University of San Francisco
- Tell them you are filing a report under the section Penal Code 11160 (or P.C.11165.7(41))
- Record the name of the person who took the report along with the report number, a fax number or email of the agency, date and time.

**2. Make a written report**

- No later than 36 hours after your verbal report
- Fill out Form SS 8572
- Send a copy of the report either through scan, email, or fax to the agency with whom you spoke.

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## CANRA Training & CANRA Acknowledgement Form

To ensure compliance with mandated reporting obligations, individuals authorized by the University of San Francisco to work with minors or oversee related programs must complete mandated [Child Abuse and Neglect Reporting Act \(CANRA\) training](#). Mandated Reporters must comply with the duties imposed by CANRA whether or not they have undergone training from the University. Following the training, Mandated Reporters must sign a statement acknowledging that they understand and will comply with CANRA.

Persons authorized by the University to work in a program that brings that individual into regular contact with minors, or person who direct or supervises such a program, must sign the [CANRA Acknowledgement to Report Child Abuse Form](#).

### Training

Mandated Reporters regularly working or volunteering in University-sponsored programs involving minors must fulfill the following requirements:

**1. [USF CANRA Training Video](#)**

- a. All Mandated Reporters must watch the [USF CANRA Training Video](#), acknowledging their understanding and commitment to comply with CANRA reporting obligations. Post-training, employees or regular volunteers designated as Mandated Reporters must sign the [CANRA Acknowledgment to Report Child Abuse Form](#).

**2. Complete the "[Protecting Minors: Identifying and Reporting Suspected Abuse](#)" Training video provided by EduRisk, accessible after registration on the EduRisk Learning Portal. Upon completion, obtain the certificate and submit a copy to the respective department.**

- a. USF's United Educators branch code is 442-88956

- Individuals in roles regularly involving minors must meet the stated requirements before program engagement and on an annual basis thereafter.
  - University departments are responsible for confirming compliance and retaining completed forms and supporting documents for a minimum of three years for audit purposes.
  - Persons authorized by the University to work in a program that brings that individual into regular contact with minors, or person who directs or supervises such a program, must sign the [CANRA Acknowledgment to Report Child Abuse Form](#).
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## **Exceptions**

This policy does not apply to: (1) events on campus that are open to the public; (2) private events where minors attend under the supervision of a parent or legal guardian; and (3) activities or programs that involve minors who are matriculated University students.

A request for an exception to the training and fingerprinting requirements must be submitted for review and approval in accordance with the procedures contained in this Policy. See **Authorization**.

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## **Miscellaneous Information About Working with Minors**

### **Infrequent Contact with Minors**

If an individual's job duties or assignment has only infrequent or incidental contact with minors, the individual is not a Mandated Reporter. However, they are still encouraged to take the reporting training and report any suspected instance of child abuse/neglect.

If volunteers work with minors less than 16 hours per month or 32 hours per year, they are also not considered a Mandatory Reporter. However, they are still encouraged to take the reporting training and report any suspected instance of child abuse/neglect.

### **Minors not participating in University-Sponsored Events**

The University of San Francisco, as an institution of higher learning, is generally not a proper environment for minors unless they are participating in an authorized program or activity and adequately supervised by adults who have the appropriate training and credentials.

Daycare or babysitting services in dorms, offices, or any other university building are not permitted. In-home childcare arrangements in private residences located on University property are prohibited. If daycare or childcare is needed, please view the University's [Parent Group page](#) for further information and resources.

Pursuant to other university policies and/or federal and/or state laws and regulations, minors should not be present in certain facilities and environments. If a parent or legal guardian brings their minor child to work, the parent or guardian is responsible for the minor's welfare and must ensure that the minor child does not visit restricted locations.

In general, minors should not be left unsupervised on the University's campus. It is the responsibility of those who bring minors to campus (including Program Sponsors or third party organizations) to ensure appropriate supervision.

## Overnight Stays Involving Minors

Contracts with non-university organizations bringing minors on campus for an overnight stay or for consecutive-day (or longer) visits must include the following provisions:

- General Liability insurance with limits of at least \$1 million per occurrence and \$2 million aggregate.
- Sexual Misconduct (also known as Abuse and Molestation) liability insurance with limits of at least \$1 million per occurrence and \$3 million aggregate.
- Confirmation from the non-University organization that all their employees, regular volunteers, and/or staff under their direction (or, if there are no employees, the lead contractor or supervisor) providing direct, on-site supervision of the activity is a Mandated Reporter under CANRA and has signed the [Criminal Background Check Form](#).
- A link to (or copy of) this policy advising that the non-University organization abides by the requirements contained herein, along with a notification that failure to abide by this policy may constitute grounds for termination of the activity.
- An indemnification clause in which the non-University organization agrees to indemnify The University of San Francisco for claims, lawsuits, or other actions that arise as a result of the non-University organization's use of campus facilities. Standard language reads as follows:

**[NON-UNIVERSITY ORGANIZATION] shall defend, indemnify and hold THE UNIVERSITY OF SAN FRANCISCO, its officers, employees and agents harmless from and against any and all liability, loss, expense, including reasonable attorneys' fees, or claims for injury or damages arising out of the performance of this Agreement, but only in proportion to and to the extent such liability, loss, expense, attorneys' fees, or claims for injury or damages are caused by or result from the negligent or intentional acts or omissions of [NON-UNIVERSITY ORGANIZATION], its officers, agents or employees.**

Written permission must be obtained in advance from the parent or guardian of any minor staying overnight in University housing. The written permission should include parent's or guardian's contact information in the event of a medical emergency involving the minor. Minors staying overnight are subject to all of the security, supervision, and behavioral rules and procedures applicable to University students living on campus. See [Student Residential Policies](#).

If a minor will be sharing a room with a University student, another University student (or other authorized adult) or another minor must also share the room so that at least three individuals will be occupying the room overnight.



Children under the age of 13 may not be signed in as a guest to the residence halls unless prior approval has been established in writing by the Assistant Dean for Community Living or designee. Otherwise, children under the age of 13 may only visit students briefly in the lobby and/or informal lounge areas. As with all guests, the USF resident host is solely responsible for any person under 18 or teenagers (age 13–18) whom they register as a guest. The University is not responsible and/or liable for the safety/welfare or care of visiting minors in the residence halls.

### Supervision and Protection of Minors

The following standards must be observed in the conduct of any University program involving minors and are intended to ensure the safety of the participants and minimize any disruption to the University's regular business activities:

- AB 506: "Two adult rule": The presence of at least two Mandated Reporters, whenever administrators, employees, or volunteers are in contact with, or supervising children.
- AB 2669 requires, to the greatest extent possible, the presence of at least 2 mandated reporters whenever administrators, employees, or regular volunteers are in contact with, or supervising, children.
- AB 506 requires the presence of at least two Mandated Reporters, whenever administrators, employees, or volunteers are in contact with, or supervising minors. There is a caveat for one to one mentoring, in which case the two-person rule can be bypassed if an organization has a procedure in line with 11165.9 of the Penal Code. This involves mandated reporters reporting any sort of suspected child abuse or neglect to to any police department or sheriff's department, not including a school district police or security department, county probation department, if designated by the county to receive mandated reports, or the county welfare department. Minors who are not accompanied by a parent or legal guardian must be supervised at all times by at least one adult (preferably two adults) authorized by the University to work in an on-campus or off-campus activity designed for children.
- Minors, even if accompanied by an adult, shall be restricted from using certain equipment or entering certain areas of the campus such as laboratories and other facilities, when it presents a safety hazard for children.
- If minors will be receiving instruction or volunteering in a laboratory, the department must ensure that these students receive appropriate training in lab safety rules and procedures. See [Laboratory Safety Policy](#).
- Minors are not allowed in classrooms while classes are in session unless prior approval has been obtained from the faculty member and the dean.
- Minors who are disruptive or who do not meet appropriate standards of student conduct may be removed from the program, at the discretion of the University.

Departments that administer or sponsor programs designed for minors should implement the procedures set forth in the University's [Guidelines for Supervising Minors](#).

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## RELATED INFORMATION

Type	Title
USF	<a href="#">Guidelines for Supervising Minors</a>
USF	<a href="#">Laboratory Safety Policy</a>
USF	<a href="#">Vehicular Use Policy</a>
USF	<a href="#">Whistleblower Policy</a>
USF	<a href="#">Retaliation Policy</a>
External	<a href="#">California Child Abuse and Neglect Reporting Act</a>
External	<a href="#">EduRisk Learning Portal – Protecting Children: Identifying and Reporting Misconduct</a>
External	<a href="#">California Assembly Bill 506</a>
External	<a href="#">California Assembly Bill 2669</a>

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## DEFINITIONS

Term	Definition
<b>Abuse</b>	Includes physical injury inflicted by other than accidental means on a child; sexual assault or sexual exploitation of a child; willful harming or injuring of a child; and unlawful corporal punishment or injury inflicted on a child, resulting in a traumatic condition. [CANRA Sections 11165.1 and 11165.6]
<b>Business Manager</b>	A University employee, designated by the President, Vice President, Vice Provost, or Dean who is the financial manager for the University account(s) being used for the expense. This may include the President, Vice Presidents, Vice Provosts, or the Deans.
<b>Employee</b>	Someone who is permitted or suffered to work for the University for compensation.
<b>Mandated Reporter</b>	Any person employed by the University, “regular volunteer,” or other individual who is required under CANRA to report known or reasonably suspected child abuse or neglect to appropriate law enforcement authorities. See <b>Appendix A</b> .

<b>Minor (or Child)</b>	Any person under the age of eighteen (18) [CANRA sec. 1165.1].
<b>Neglect</b>	The negligent treatment or maltreatment of a child by a person responsible for the child's welfare under circumstances indicating harm or threatened harm to the child's health and welfare. The term includes both acts and omissions on the part of the responsible person such as lack of adequate food, clothing, medical care, etc. [CANRA Section 11165.2]
<b>Regular/Volunteer</b>	An individual who provides services on behalf of the University for no remuneration or expectation that they will be compensated except for the reimbursement of out-of-pocket expenses. AB 506 defines "regular volunteer" as "a volunteer with the youth service organization who is 18 years of age or older and who has direct contact with, or supervision of, children for more than 16 hours per month or 32 hours per year."
<b>CANRA</b>	Also referred to as the "California Child Abuse and Neglect Reporting Act". It was passed in 1980 and specifies who is considered a mandated reporter as well as ensuring the protection of minors while under the supervision of various types of professionals.
<b>AB 506</b>	California's Assembly Bill 506 (AB506) became law on September 16, 2021, and went into effect on January 1, 2022. This law sets new requirements for youth-serving organizations in three areas: screening, training, and policies. In addition, the law allows insurance carriers to seek verification of compliance with these requirements.
<b>AB 2669</b>	California's Assembly Bill 2669 (AB 2669) became law on September 06, 2022 and went into effect on January 1, 2023. This law sets further requirements for training for working with minors. Such extensions include defining "regular volunteers" as "a volunteer with the youth service organization who is 18 years of age or older and who has direct contact with, or supervision of, children for more than 16 hours per month or 32 hours per year". Additionally, AB 2669 requires background checks and training for working with minors. It also establishes a two-person rule in which 2 mandated reporters are required to be in the presence of minors. This two-person requirement isn't in effect for 1-on-1 mentoring as long as there is an established process and the service provider has been trained as a mandated reporter.
<b>Matriculated Minors</b>	Matriculated Minors at the University of San Francisco are individuals who have been formally enrolled as students while

still under the age of 18. As a distinctive category within the broader student body, matriculated minors encompass students aged 17 and below. During this period, matriculated minors shall be treated equivalently to other students, adhering to the same university rules, conditions, and expectations, all in accordance with local, state, and federal guidelines.

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## FORMS

Form	Use	Location
<a href="#">Acknowledgment to Report Child Abuse Form (CANRA)</a>	Used to document that individuals who are Mandated Reporters will comply with the reporting requirements set forth in this Policy.	Risk Management
<a href="#">Release and Waiver of Liability, Assumption of Risk, and Indemnity Agreement</a>	Used to obtain consent from the parent or legal guardian of a minor who will be participating in a University activity.	Risk Management
<b>Request for Live Scan Service (BCIA 8016)</b>	Used to request electronic fingerprinting check by the DOJ.	Department of Justice
<a href="#">Suspected Child Abuse Report, Form SS 8572</a>	Used to report suspected child abuse or neglect to an authorized law enforcement agency.	Department of Justice

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## RESPONSIBILITIES

### Mandated Reporters

- Consents to fingerprinting prior to performing any services in a University-sponsored program involving minors.
- Completes initial and annual training on the protection of minors.
- Signs [CANRA Acknowledgment to Report Child Abuse Form](#).
- Immediately reports known or reasonably suspected child abuse or neglect to local law enforcement, child protective services or county welfare departments in accordance with this Policy.
- Completes written report, as instructed by the investigating agency, within 36 hours of making an initial call to local law enforcement, child protective services or county welfare departments.

## Department/Business Manager

- Ensures that individuals under its jurisdiction who regularly work with minors, or who supervise such individuals, undergo requirements under this Policy.
- Ensures that parents or guardians of children participating in a department program designed for minors complete and sign the [Release and Waiver of Liability](#) form.
- Ensures that parents or guardians provide prior written authorization whenever a minor will be released to the custody of another adult or transported in a vehicle occupied only by a University adult and a minor.
- Ensures that individuals under its jurisdiction who regularly work with minors, or who supervise such individuals, immediately report any known or reasonably suspected child abuse or neglect.
- Forwards reports to a [University Officer](#) or to the Whistleblower Hotline to be made anonymous if an employee has reported it to them.

## Risk Management

- Coordinates registration of authorized drivers operating University-owned or private vehicles to transport minors in connection with a University-sponsored program.
- Coordinates review of requests for an exception to this Policy.
- Coordinates with each respective department to check fingerprinting results in the Department of Justice database.

## President, Vice Presidents, Vice Provosts, and Deans

- Ensures that employees in their division who work in or administer programs involving minors are in compliance with this Policy.

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## REVISION HISTORY

12/01/2018	First publication of Policy.
10/1/2020	3rd party contractors, CANARA updates, and removal of background checks.
5/1/2025	Updated to reflect changes to Assembly Bill 506 and Assembly Bill 2669, which includes screening, training, regular volunteer requirements, and protective administrative procedures. Addition of Minors Registration Form.

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## PROCEDURES

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### Authorization

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## AUTHORIZATION

This Policy is published under the authority of the Vice President for Business and Finance. Any request for an exception to the Policy must be submitted to Risk Management for review and approval, if appropriate. The request must include a written statement explaining why the standards set forth in the Policy are not attainable or desirable and a description of the alternative procedures, if any, that would be implemented in their place.

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## LIVE SCAN / FINGERPRINTING

All University employees, students, and “regular volunteers” who regularly work in a University-sponsored program intended for minors or who administer such a program are required to successfully complete fingerprinting prior to undertaking an assignment involving minors.

Fingerprinting is coordinated by the Office of Risk Management. Departments that administer programs involving minors must arrange for the following:

- **Fingerprinting** – The University uses the California Department of Justice (DOJ) Live Scan Service for conducting fingerprinting. Each person subject to this Policy must complete the **Request for Live Scan Service (BCIA 8016)** form and provide appropriate identification for submission to the DOJ, which will conduct an electronic check of the individual’s fingerprints. Make sure to obtain the ORI Code and Billing Number for the Live Scan form from Risk Management to ensure results are sent to the University of San Francisco confidential Department of Justice portal.

All individuals authorized to work with minors on a regular basis must complete fingerprinting on an annual basis. Individuals who have not completed the check will not be permitted to participate in a University-sponsored activity involving minors.

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## PARTICIPANT WAIVER

The parent or legal guardian of each minor participating in a University program must complete and sign the [Release and Waiver of Liability](#) form published by Risk Management. The form must be signed and returned to the department in advance of the minor's participation in the program. Minors will not be allowed to take part in the program until a properly completed form is received by the department. Copies of the completed forms must be retained by departments for audit purposes for a minimum of three years.

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## MINORS REGISTRATION FORM

Departments and event supervisors shall complete the [Minors Registration Form](#) to provide details of the program involving minors. The completed form will be routed to the Risk Management office for review and approval. Please expect a 5-10 day turnaround.

In the meantime, please visit the [Protection of Minors](#) website which details the steps required to engage in a program with minors. This includes fingerprinting, protection of minors training, and Mandatory Reporter training. Please note that a [release of liability waiver](#) will also be required for minors to participate in the program, and must be signed ahead of time by a parent or legal guardian.

Third party programs involving minors (i.e. – outside organization renting housing space or university building space) are not required to fill out the Minors Registration Form; however, the 3rd party/university sponsors are required to fill out the [USF Criminal Background Check Form](#).

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## DRIVERS

Any individual operating a vehicle as part of a University-sponsored activity involving minors must be registered as an authorized driver with Risk Management, in accordance with the **Vehicular Use Policy**. Drivers who are not registered with Risk Management are prohibited from transporting minors in connection with any University activity.

A University-owned vehicle, rather than a privately owned vehicle, should be used for transporting minors. A minor should also never be driven alone in a vehicle by an adult driver. See [Guidelines for Supervising Minors](#).

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## VIOLATIONS

A violation of any portion of this Policy may result in disciplinary action, up to and including termination of employment and/or legal action. In addition, a Mandated

Reporter who fails to report an incident of known or reasonably suspected child abuse or neglect is subject to fines and/or imprisonment pursuant to CANRA Section 11166.(c).



# Protection of Minors Policy FAQs

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## 1. Are faculty members Mandated Reporters?

In general, faculty members are not Mandated Reporters because they normally teach only enrolled University students. However, a faculty member may meet the definition of a Mandated Reporter set forth in CANRA because of other duties performed by the individual. For example, a faculty member may:

- Instruct minors in connection with an academic program, lab training, or other enrichment activity.
- Interact with high school students as part of a University internship or recruiting program.
- Conduct a research study that utilizes volunteers who may be minors.

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## 2. What type of conduct is reportable?

Under CANRA, the following forms for child abuse or neglect must be reported:

- Physical injury inflicted by other than accidental means [CANRA Section 11165.6].
- Sexual abuse, meaning sexual assault or sexual exploitation of a child [CANRA Section 11165.1].
- Sexual exploitation, meaning depicting a child in, or knowingly developing, duplicating, printing, downloading, streaming, accessing through any electronic or digital media, or exchanging, a film, photograph, videotape, video recording, negative, or slide in which a child is engaged in an act of obscene sexual conduct [CANRA Section 11165.1(c, d)].
- Neglect, meaning the negligent treatment, lack of treatment, or the maltreatment of a child by a person responsible for the child's welfare under circumstances indicating harm or threatened harm to the child's health or welfare [CANRA Section 11165.2].

Child abuse does not include "mutual affray" between minors (e.g., fist-fights).

For additional information on reportable conduct, see [CANRA](#) Code Sections 11165.1-11165.6.

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## 3. What is "reasonable suspicion?"

As defined under CANRA, "reasonable suspicion" means that it is objectively reasonable for a person to entertain a suspicion, based upon facts that could cause a reasonable

person in a like position, drawing, when appropriate, on their training and experience, to suspect child abuse or neglect. "Reasonable suspicion" does not require certainty that child abuse or neglect has occurred nor does it require a specific medical indication of child abuse or neglect; any "reasonable suspicion" will suffice. The pregnancy of a minor, however, does not, in and of itself, constitute a basis for a reasonable suspicion of sexual abuse [CANRA Section 11166(a)(1)].

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4. In my job, I don't have regular contact with minors. Do I have to complete the requirements to work with minors and sign a CANRA form?

An individual who does not have contact with minors on a "regular basis" may not have to undergo training and fingerprinting. Because the term "regular basis" is not defined under CANRA, questions regarding whether a particular individual would be treated as a Mandated Reporter or not should be referred to Risk Management, which will conduct a review of the job duties assigned to the position that involves contact with minors. CANRA does; however, encourage an individual who has contact with a minor (even if not on a regular basis) to undergo training.

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5. Can I simply tell my supervisor if I observe an incident of child abuse or neglect?

No. If you are a Mandated Reporter, informing your supervisor does not meet your legal obligation to call local law enforcement, child protective services, or county welfare departments. While you should promptly notify your supervisor, all employees, students, and regular volunteers who regularly work with minors are required to call local law enforcement, child protective services, or county welfare departments if they reasonably suspect an occurrence of child abuse or neglect.

6. Does CANRA or the University Policy on Reporting Child Abuse and Neglect require contractors or volunteers (other than University administrators) to sign certification forms? What about "regular volunteers?"

The certification mandate applies only to employees or "regular volunteers." However, the University may utilize the certification form as a means of notifying volunteers of statutory obligations and University expectations for reporting. This approach is particularly encouraged for volunteers who otherwise regularly interact with children through University programs. Volunteers and contractors do not have the same civil and legal penalties if there is a failure to report under CANRA, however; the University expects both to act as a Mandated Reporter.

Under [AB 506](#), the term “regular volunteer” was introduced to mean, “a volunteer with the youth service organization who is 18 years of age or older and who has direct contact with, or supervision of, children for more than 16 hours per month or 32 hours per year.”

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## 7. What about minors who are also matriculated students?

Matriculated students at the University of San Francisco are individuals formally enrolled in academic programs or courses. Occasionally, these matriculated students may include minors. Matriculated minors shall be regarded and treated as regular students if they are enrolled at the University, abiding by the same rules and conditions within local, state, and federal guidelines.

Once a matriculated minor turns 18, they will no longer be considered a minor and will be treated as an adult student.

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# Mandated Reporters

## Appendix A

Under the California Child Abuse and Neglect Reporting Act (**CANRA**), certain University employees are required to report known or reasonably suspected cases of child abuse or neglect. Such employees are deemed to be “Mandated Reporters” and include, but are not limited to, the following positions:

- A teacher.
- An instructional aide or teacher’s assistant.
- An administrator or employee of a youth recreation program.
- An administrator or employee whose duties require direct contact and supervision of children.
- An administrator or employee whose duties bring the administrator or employee into contact with children on a regular basis, or who supervises those whose duties bring the administrator or employee into contact with children on a regular basis, as to child abuse or neglect occurring on the institution’s premises or at an official activity of, or program conducted by, the institution.
- Child care employees.
- An employee of a police department or a peace officer.
- Members of the clergy.
- Any athletic coach, assistant coach, or graduate assistant involved in coaching.
- Health care professionals, including physicians, psychiatrists, psychologists, residents, nurses, therapists, clinical counselors, and similar workers.

Students providing services on behalf of the University without compensation are not treated as Mandated Reporters under CANRA. These individuals, however, are subject to the requirements contained in this Policy applicable to Mandated Reporters if their volunteer services involve contact with minors. As of September 6, 2022, AB 506 defines “regular volunteer” as “a volunteer with the youth service organization who is 18 years of age or older and who has direct contact with, or supervision of, children for more than 16 hours per month or 32 hours per year.”

For a complete list of all mandated reporters, see Section 11165.7(a) of **CANRA**.

Volunteers who are in contact with children but are not regarded as “mandated reporters” are encouraged to take the reporting training and report any reasonable suspicion of child abuse and/or neglect.

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