Guidance for Online Youth Programming (Spring 2021)

Introduction

UW–Madison precollege and youth programs/activities will not meet in person during spring 2021. This document explains youth protection requirements and campus guidelines for programs and activities that are approved by the provost to operate online.

I. Variance Process for Youth Programs
   (e.g. approval process to operate online during the pandemic)

   All youth programs or activities wishing to operate online during the COVID-19 pandemic must be approved by the dean of a school or college and then by the provost. Programs previously approved for 2020 must submit a new request for 2021.

   Complete these steps to seek approval for an online program/activity for minors:

   1. Discuss your request with your unit’s dean or director (Risk Executive Sponsor) or their designee. If they approve, then they will forward the request to the provost. In some schools/colleges, the requests are collected by the dean and forwarded as a batch to the provost.
   2. The provost will consider each request and forward notification of approvals to OYPC.
   3. OYPC will contact approved programs to arrange a consultation, if necessary. During these individual consultations, OYPC will provide guidance and campus expectations.

II. OYPC Compliance Parameters for Approved Online Programs/Activities

A. Registration with OYPC

   1. **Register:** Youth programs and activities operating online must register with OYPC via a Qualtrics form. This also applies to programs that previously registered in 2020 for in-person or summer online programming.

   2. **Canvas Course:** Enroll in the 2021 Youth Program Compliance Canvas course through the OHRD Catalog and complete the assignments.
      a. For the assignment “Submit Staff Roster,” please submit a preliminary staff roster at least one week before programming begins so that OYPC and the Office of Compliance can confirm completion of staff training.
      b. For the assignment “Submit Participant Roster,” please submit a final participant roster at the end of the program. Virtual programs are not required to submit a roster to Risk Management for the university’s Camps and Clinics Blanket Accident Insurance, because online activities are not covered under this insurance policy.
B. Program Staffing

1. **Program staff are Authorized Adults** and must complete required screening and training:
   a. Staff must complete required criminal background checks before interacting with youth.
   b. Staff must complete required online training before interacting with youth. Refer to Program Staff Trainings https://youthsafety.wisc.edu/compliance/program-staff-trainings/ to register.
   c. **Required training for virtual programs includes:**
      i. Mandatory Reporting of Child Abuse and Neglect (OYPC) (every two years, all staff)
      ii. Preventing Sexual Harassment and Sexual Violence (every three years, all staff)
      iii. Responsible Employee for reporting sexual misconduct (every year, all staff)
      iv. Campus Security Authorities (every year, all staff)

2. **Program staff are mandated reporters:**
   a. All UW–Madison employees, volunteers, and contractors are mandated reporters of child abuse and neglect according to Governor’s Executive Order #54 (EO 54), even in online interactions.
      i. Abuse has been shown to increase during physical distancing and isolation at home.
      ii. Staff may recognize abuse in the background of a participant’s video.
      iii. During online interactions, staff may become aware of abuse in the home.
   b. Responsible Employees are required to report violations of the UW–Madison Sexual Harassment and Sexual Violence Policy.
   c. Clery Act Campus Security Authorities are required to report crimes that occur on campus:
      i. Stalking (through electronic communication) and intimidation as a hate crime (through electronic communication) must be reported under the Clery Act only if an individual is physically located on UW–Madison property while sending or receiving the electronic communication.
      ii. Reporting for most other crimes under the Clery Act is not applicable in a virtual environment.

III. Technology Guidance

A. Use Devices and Software approved by UW–Madison

1. Staff must use devices compliant with How to Stay Safe Online While Accessing Campus Remotely.¹
2. Program staff must use UW–Madison approved or licensed meeting software secured with a NetID login (for staff) for all synchronous online activities with minors. Follow guidance in Web Conferencing Tools Simplified² and Which Tool Should I Use?³.
3. To avoid one-on-one contact with minors, program staff should use the program’s service email account and social media accounts instead of their own personal accounts. See Section IV
4. Review Pros and Cons of Virtual Platforms: Safety Considerations⁴ provided by the American Camp Association (ACA).

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¹ https://kb.wisc.edu/internal/page.php?id=98331
² https://it.wisc.edu/learn/guides/web-conferencing-tools-simplified/
³ https://kb.wisc.edu/45390

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B. Control access to the online platform

1. To invite participants to an online session, use blind copy to avoid cross-sharing everyone’s email addresses. Copy the Program Director or another program staff member in the invitation.
2. The instructor must have and use a class roster, including verified email addresses and phone numbers, so participants can be identified by the instructors.
3. Use only the first name and last initial of each participant during online sessions (or follow another naming convention that avoids showing both the first and last names together).
4. Take verbal attendance. People may come in late, so attendance is ongoing.
5. Remove people whose identities cannot be verified (with due process).
6. Set up sessions with one-time identifiers, not “personal rooms.”
7. Password-protect sessions, and send the password directly to rostered class members.
   a. Don’t post the meeting identifier or password to a location visible to all participants.5
   b. Use the platform’s “waiting room” feature and verify identities before admitting to the session.6
8. Disable participant screen sharing, unless it is essential to the effectiveness of the activity.
9. Disable private chat features, or make all chats visible to the host (instructor and/or additional program staff) and save the chat transcript.

C. Make online interactions observable and interruptible

Increase visibility to online interactions either by recording the sessions or by including more than one program staff member in each session.

1. Record online interactions:
   a. Use meeting software accessible to participants without NetIDs and approved for recording according to the [Provisional UW–Madison Online Collaboration Session Recording Policy].7
   b. Store recordings and control access to them according to campus [Policy]8 for sensitive data.
   c. Recordings of interactions, where minor participants are identifiable (seen, heard, or named) are assumed to be similar to roster data, and determined by Cybersecurity to be sensitive.
2. Include more than one program staff member in each session:
   a. In addition to the instructor, include another Authorized Adult in the session.
   b. The additional Authorized Adult may also be responsible for managing the online space, including taking attendance and monitoring the chat.
3. Invite the Program Director to all meetings. Program Directors should drop in to meetings often.
4. Provide a way for the instructor or other staff to summon the Program Director to an online session.
5. Share the program schedule with parents or guardians and youth participants. Identify group activities, special events, and scheduled times for online tutoring or small group sessions.
   Encourage parents to help monitor their child’s participation.
6. Provide a way for participants to offer feedback about their experience in the group.
7. Evaluate outcomes (this applies to all programming and is not unique to online programming).

5 [https://kb.wisc.edu/internal/100196](https://kb.wisc.edu/internal/100196)
6 [https://kb.wisc.edu/internal/100196](https://kb.wisc.edu/internal/100196)
7 [https://kb.wisc.edu/helpdesk/99583](https://kb.wisc.edu/helpdesk/99583)
8 [https://kb.wisc.edu/helpdesk/99583](https://kb.wisc.edu/helpdesk/99583)
IV. Standards for Virtual Interactions with Minors

UW–Madison’s Precollege and Youth Program Policy outlines appropriate interactions with minors, which apply to virtual interactions as well as in-person activities. The following list outlines prohibited behaviors along with some acceptable alternatives for safe interactions.

1. Avoid one-on-one contact between adults and minors in video conferencing or email, text, chat and other online communications.
   a. Suggestion: Include another adult.
      i. Email from the program’s service email. Avoid using your personal email account.
      ii. Include a parent in all correspondence.
      iii. Include the program director in all correspondence.
   b. Suggestion: Include other youth participants.
      i. Lead small group advising and tutoring instead of one-on-one.
      ii. Reschedule the session if only one youth is available at that time.
   c. Save email, chat, and text message strings.

2. Do not interact with program participants through personal accounts on social media platforms like Facebook, Instagram, Twitter, Snapchat, and others.
   a. Youth participants may follow the program’s social media accounts.
   b. Program staff may communicate with youth participants through the program’s social media accounts. Avoid one-on-one interactions through direct messaging.
   c. If program participants request to friend or follow a program staff person’s personal accounts, then the program staff person must deny the request and report to the program director.

3. Limit interaction with program participants through video conferencing, email, and messaging between program staff and participants to reasonable program hours.

4. Do not use cell phones, cameras, imaging, or digital devices in an inappropriate way.

5. Do not make sexual materials in any form available to minors or assist them in any way in gaining access to such materials.

6. Do not use or be under the influence of alcohol or drugs during online interactions with minors.

7. Do not engage in discrimination or harassment.

8. Do not engage in verbal abuse toward or in the presence of a minor.

9. Follow the program’s incident reporting requirements to report online behavioral issues, suspicion of child abuse or neglect, and violations of campus policies.