



I. POLICY STATEMENT

Texas Southern University (“the University”) is committed to promoting the health, safety, welfare, and protection of minors participating in programs, camps, clinics, conferences, workshops, educational activities, research initiatives, athletic activities, enrichment programs, and other activities conducted by or on behalf of the University or occurring on property owned, leased, operated, or controlled by the University.

The University is dedicated to maintaining a safe and supportive environment for minors and to ensuring that appropriate safeguards, training, supervision, screening, reporting, and operational standards are implemented in connection with all programs and activities involving minors, whether operated by the University or by a third party on University property.

The University shall maintain appropriate safeguards, screening requirements, training standards, reporting obligations, operational controls, and protocols designed to:

1. Protect minors from abuse, neglect, exploitation, harassment, and other misconduct;
2. Ensure compliance with applicable federal and state laws, including but not limited to Texas Education Code §§ 51.976 and 51.9761, Texas Family Code § 261.101, Texas Health & Safety Code Chapter 141, Title IX of the Education Amendments of 1972, and the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act; and
3. Promote the health, safety, welfare, and protection of minors participating in University programs and activities.

II. PURPOSE AND SCOPE

A. Purpose

This policy establishes the University's requirements for conducting all University-related programs and activities involving minors in a safe manner and in compliance with applicable federal, state, and local laws, including Texas Education Code §§ 51.976 and 51.9761 and Texas Family Code § 261.101, and constitutes the University's mandatory child abuse and neglect reporting policy as prescribed by Texas Education Code § 51.9761.

The provisions of this policy establish requirements related to program registration and approval, background screening, mandatory training, supervision standards, mandatory child abuse reporting obligations, emergency response coordination, operational safety measures, third-party compliance, and centralized institutional oversight for all University-related programs and activities involving minors.

All employees, students, volunteers, contractors, and other persons acting on behalf of the University who interact with minors in University programs or activities shall comply with the



mandatory reporting requirements set forth herein and are subject to mandatory child abuse reporting training as required by this MAPP and applicable law. Abuse and neglect are defined in Texas Family Code § 261.001.

B. Scope

This policy applies to all University-sponsored programs involving minor participants, as well as third-party programs or external youth activities conducted on property owned, leased, operated, or controlled by the University. Its provisions govern all TSU departments, colleges, divisions, auxiliaries, athletic programs, and student organizations.

Compliance with this policy is required for all employees, faculty, volunteers, contractors, interns, student-workers, and third-party personnel designated as Authorized Adults participating in programs or activities involving minors.

Programs meeting the statutory definition of a Campus Program for Minors under Texas Education Code § 51.976 or a licensed youth camp under Texas Health & Safety Code Chapter 141 are subject to additional state-mandated requirements as determined by the Programs for Minors Coordinator (PMC).

III. DEFINITIONS

a. Minor: Any individual under eighteen (18) years of age. For the purposes of this MAPP, the term may be used interchangeably with “youth”.

b. Campus Program for Minors (CPM): As defined under Texas Education Code § 51.976, a program operated by or on the campus of the University that offers recreational, athletic, religious, or educational activities for at least twenty (20) participants who are not enrolled at the University and who attend or temporarily reside at the program for all or part of at least four (4) days. Programs meeting this definition are subject to mandatory pre-program registration with the Texas Department of State Health Services (DSHS) and additional state compliance requirements.

c. Covered Youth Activity: Any University-sponsored or third-party event involving minors on campus that does not meet the statutory thresholds of a Campus Program for Minors but involves direct interaction with minors, including single-day clinics, workshops, outreach activities, enrichment programs, or similar activities.

d. Programs for Minors Coordinator (PMC): The University official designated by the Office of Enterprise Risk Management to centrally monitor, coordinate, and oversee compliance with this policy.

e. Program Operator: The specific individual possessing primary operational and administrative responsibility for a campus-related program involving minors.

f. Authorized Adult: A University employee, volunteer, student worker, intern, contractor, or third-party personnel who has successfully completed all required training and background screening requirements, who has been approved to interact with minors participating in programs or activities



authorized by the University and approved by the Programs for Minors Coordinator, and is not subject to disqualification under Section V.B of this policy.

g. Texas Southern University Police Department (TSUPD): The University's campus police department.

IV. PROGRAM REGISTRATION AND APPROVAL

A. Centralized Administration and Prior Written Approval

1. Role of the Coordinator

The Office of Enterprise Risk Management shall designate a Programs for Minors Coordinator (PMC). The PMC shall possess institutional authority to oversee compliance with this policy, determine which state regulatory framework applies to a given program, conduct compliance reviews or facility audits, and suspend related programs or activities where necessary to protect participant safety or address material noncompliance. Program Operators are responsible for working with the PMC to identify the applicable regulatory framework prior to the program's official announcement or commencement.

2. Mandatory Written Pre-Approval

No camp, clinic, conference, workshop, or youth program involving minors, whether University-operated or third-party, may operate on University property without prior written approval from the PMC.

3. Registration Deadline

Program Operators must submit required registration materials and supporting documentation to the PMC at least thirty (30) days prior to the scheduled start date unless otherwise approved by the PMC.

For programs qualifying as Campus Programs for Minors under Texas Education Code § 51.976, the PMC shall ensure required DSHS filings and applicable fees are submitted prior to program commencement in accordance with state law.

V. CRIMINAL BACKGROUND SCREENING

A. Background Screening Protocol

Every Authorized Adult scheduled to interact with minors must complete a comprehensive background screening prior to the program start date. Background screenings must be program-specific and conducted within the preceding twelve (12) months. Prior employment background checks alone shall not satisfy this requirement. All background screenings shall be coordinated through the University's Human Resources Department and shall include:

1. Identity verification, including legal name verification and review of known aliases;
2. Appropriate federal, state, and county criminal history searches;



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3. Verification through the Texas Department of Public Safety Sex Offender Registry; and
 4. Verification through the National Sex Offender Public Website (NSOPW).

B. Disqualification of Authorized Adults and Prohibition on Program Participation

In accordance with applicable law, University standards, and risk-based participant safety considerations, individuals with criminal histories involving sexual offenses, crimes against children, human trafficking, child pornography, violent felonies, crimes involving moral turpitude, or the abuse, neglect, or exploitation of minors are disqualified from serving as Authorized Adults, and are prohibited from participating at any level in any programs or activities involving minors. Both the disqualification and prohibition are permanent and cannot be waived under any circumstances.

VI. MANDATORY TRAINING REQUIREMENTS

A. Youth Protection Training for Authorized Adults Interacting With Minors

In compliance with Texas Education Code § 51.976, youth protection training is mandatory for all adults designated and authorized to interact with minors. Pursuant to Tex. Educ. Code § 51.976(b), all such individuals must successfully complete a Texas Department of State Health Services (DSHS)-approved Sexual Abuse and Child Molestation Awareness Training and examination program *at least once every two (2) years prior to interacting with minors*.

For newly hired authorized adults interacting with minors, or newly assigned program personnel, *the training must be completed within the first five (5) days of employment or assignment to the program*. This provision shall apply to individuals in positions involving direct contact with campers, minors, and designated campus programs involving minors.

B. Mandatory Child Abuse Awareness and Reporting Training for All Employees

In compliance with Texas Education Code § 51.9761, all adult professionals at an institution of higher education shall complete mandatory child abuse awareness and reporting training irrespective of whether such adults anticipate or will interact with minors.

For the purposes of this policy, professionals shall include all University employees, camp program staff, and volunteers, including student workers and interns, whether paid or unpaid. Training shall be provided annually and during New Employee Orientation. Such training shall include:

1. Techniques for reducing a child's risk of sexual abuse or other maltreatment;
2. Factors indicating a child is at risk for sexual abuse or other maltreatment;
3. The warning signs and symptoms associated with sexual abuse or other maltreatment and recognition of those signs and symptoms;



4. The requirements and procedures for reporting suspected sexual abuse or other maltreatment as provided by Texas Family Code Chapter 261;
5. The prohibition on retaliation; and
6. The confidentiality of reports.

To ensure ongoing awareness of mandatory reporting obligations and University procedures, Authorized Adults must complete both the DSHS youth protection training required under Section VI.A and the annual training required under this Section VI.B.

The Programs for Minors Coordinator (PMC), in coordination with the Office of Enterprise Risk Management and the Department of Human Resources, may designate additional departments, personnel, or positions required to complete such training based on operational needs, program activities, or the level of interaction with minors.

C. Custodian of Training Records

The Office of Enterprise Risk Management and the Department of Human Resources shall be responsible for maintaining records of training completion and shall provide training materials upon request. Training documentation shall be retained for a minimum of two (2) years from the date of examination, consistent with applicable state law.

VII. THIRD-PARTY OPERATOR COMPLIANCE

Third-party organizations utilizing University facilities for programs involving minors must comply with applicable University requirements, execute appropriate facility use agreements, and maintain required insurance coverage. TSU's obligations under the Clery Act, Title IX, and applicable state law are not transferred or extinguished by virtue of a third-party operating arrangement. TSU retains non-delegable duties as the property owner and as a federally funded institution, including Clery Act reporting obligations for incidents occurring in Clery geography and Title IX obligations for sexual harassment or abuse occurring on University property.

Third-party operators shall:

1. Certify compliance with applicable background screening and training requirements prior to program commencement;
2. Maintain appropriate liability insurance coverage naming Texas Southern University as an additional insured in such amounts as required by the Office of Enterprise Risk Management or applicable facility use agreement;
3. Comply with applicable contractual indemnification provisions approved by the Office of Enterprise Risk Management;



4. Submit emergency plans to the PMC prior to program commencement; and
5. Promptly report incidents involving participant safety, injuries, or allegations of misconduct occurring on University property to the PMC, the Office of Enterprise Risk Management, TSUPD, and the Title IX Coordinator, as applicable.

VIII. YOUTH PROGRAM STANDARDS AND OPERATIONAL REQUIREMENTS

A. Day Camp Requirements

1. General Supervision Requirements

Programs involving minors shall maintain appropriate supervision standards and participant protection measures at all times. Program Operators shall comply with the supervision requirements and counselor-to-minor ratios established in the Campus Programs for Minors and Youth Protection Standard Operating Procedures (SOP).

Authorized Adults shall avoid isolated, one-on-one interactions with minors whenever practicable and shall conduct interactions in observable and interruptible environments consistent with participant safety and program operations.

2. Electronic Communication Restrictions

Personal one-on-one electronic communications unrelated to program operations between Authorized Adults and minors are prohibited, including direct messaging through social media platforms or disappearing-message applications. Official communications related to program operations should be routed to parents or guardians where practicable or conducted through group communications that include another Authorized Adult, consistent with the Campus Programs for Minors and Youth Protection Standard Operating Procedures (SOP).

3. Transportation

Programs involving minors shall maintain appropriate supervision during all transportation of participants as part of program activities, such as field trips or off-site visits requiring transportation. Transportation shall be conducted in accordance with the Campus Programs for Minors and Youth Protection Standard Operating Procedures (SOP). The following chaperone, driver, and accountability requirements shall also apply:

a. Chaperone Qualifications

Individuals serving as chaperones during transportation must qualify as Authorized Adults under this MAPP prior to supervising or transporting minor participants.

b. Driver Requirements

The individual operating any University vehicle or University-arranged transportation to transport minors must:



- Hold a valid driver's license appropriate to the vehicle class
- Meet all Authorized Adult qualification requirements
- Meet the University Authorized Driver requirements and all applicable state motor vehicle laws

c. Accountability and Communication

Program Operators shall ensure appropriate accountability for minor participants during transportation and establish communication procedures for parents, guardians, Authorized Adults, and program staff in accordance with the Campus Programs for Minors and Youth Protection Standard Operating Procedures (SOP).

B. Overnight Camp Requirements

1. Overnight Accommodation and Housing

Programs involving overnight participation or any designated "Camp Session" as defined by the Texas Department of State Health Services (DSHS) as any operational period involving overnight participation for minors shall maintain the following safety standards:

- a. **Adult-Minor Separation:** Separate sleeping accommodations shall be maintained for adult staff/volunteers and minor participants. No adult shall share a bed, bunk, or immediate private sleeping quarters with a minor camper, except where explicitly authorized by University policy for approved parent or guardian accommodations.
- b. **Restroom Privacy:** Overnight facilities must provide separate toilet, lavatory, and shower spaces for adult staff and minor participants, or establish strict, monitored schedules to ensure absolute separation and individual privacy.
- c. **Bunk Bed Safety:** Any bunk beds utilized in rooms housing minor campers must feature at least two safety guardrails (one on each side of the bed) for any mattress foundation positioned more than 30 inches from the floor, in accordance with federal standards (16 CFR Part 1513.3).
- d. **Mandatory Nighttime Supervision and Staff Ratios:** Program Operators must assign at least one Authorized Adult (aged 18 or older) to be actively responsible for overnight supervision within the following limits mandated by 25 Tex. Admin. Code § 265.15:
 - Ages 4 to 5: One (1) counselor for every five (5) campers (1:5)
 - Ages 6 to 8: One (1) counselor for every six (6) campers (1:6)
 - Ages 9 to 14: One (1) counselor for every eight (8) campers (1:8)
 - Ages 15 to 17: One (1) counselor for every ten (10) campers (1:10)



C. Emergency Medical Coordination and Health Management

All programs involving minors shall establish appropriate procedures for emergency medical response and participant medical care prior to the commencement of program activities. Program Operators shall ensure compliance with the following:

- a. **Resource Accessibility:** Appropriate emergency medical resources, referral procedures, and emergency contact information must be maintained and readily accessible throughout program operations.
- b. **Designated Camp Health Officer:** Overnight programs must designate an on-site Camp Health Officer who is either a physician, Registered Nurse (RN), Licensed Vocational Nurse (LVN), or an individual holding a valid American Red Cross Emergency Response certificate (or equivalent).
- c. **Physician On-Call Agreement:** The university program must maintain a signed agreement on file ensuring a Texas-licensed physician is available on call at all times to advise medical personnel during program operations.
- d. **Unalterable Medical Log:** Program Operators are required by state law to maintain an unalterable, sequentially numbered medical log recording every injury, ailment, and medication dispensed.
- e. **Secure Medication Storage:** Prescription medications must be kept locked and administered only under direct supervision, with the sole exception of rescue inhalers or EpiPens maintained by the participant with prior authorization.
- f. **Incident Reporting Requirements:** Program Operators shall promptly document and report incidents, accidents, injuries, behavioral concerns, medical emergencies, or other significant participant safety matters arising during program operations in accordance with applicable University procedures and reporting protocols. Reports involving suspected abuse, neglect, exploitation, harassment, or criminal conduct shall additionally comply with the mandatory reporting obligations set forth in this MAPP and applicable law.

D. Floodplain Restrictions and Emergency Infrastructure

Pursuant to the Heaven's 27 Camp Safety Act (Texas Health & Safety Code § 141.0091), sleeping quarters used for youth residency shall not be located within floodplains. Program Operators must comply with the following:

- a. **Evacuation Postings:** Emergency evacuation routes must be posted inside every individual sleeping area.
- b. **Illumination Requirements:** All exit and evacuation pathways must remain clearly illuminated at night.



c. Weather Alerts: Program Operators must maintain active access to redundant severe-weather notification channels, including local emergency alerts and NOAA weather radio equipment.

E. Accessibility and Reasonable Accommodations

Programs involving minors shall provide reasonable accommodations and appropriate accessibility measures in accordance with Title II of the Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act.

a. Prohibition of Discrimination: No minor shall be denied admission to, excluded from participation in, or denied the benefits of any University youth program based on a disability or medical condition (e.g., mobility impairments, diabetes, severe allergies), unless the condition poses a direct threat to the health or safety of others that cannot be eliminated by a reasonable modification.

b. Prohibition of Surcharges: The institution shall not pass the financial or operational costs of providing a reasonable accommodation onto the participant, parent, or legal guardian, including, but not limited to, hiring American Sign Language (ASL) interpreters, modifying facilities, or purchasing specialized medical storage equipment.

c. Communication Procedures: Program Operators shall establish a clear, accessible procedure for participants, parents, or guardians to communicate accommodation needs prior to the start of the program.

d. Designated Coordinator: Program Operators must identify an appropriate program representative who is responsible for coordinating accommodation-related communications, reviewing requests, and overseeing operational considerations to ensure compliance.

IX. EMERGENCY PLANNING AND SAFETY REQUIREMENTS

A. General Emergency Plan Requirements

Programs involving minors shall maintain appropriate emergency response procedures and operational safety measures consistent with applicable law, University requirements, and program-specific risks. Emergency plans shall be developed prior to program commencement and shall address, as applicable:

1. Medical emergencies;
2. Severe weather events, including flooding and lightning;
3. Missing participants;
4. Emergency evacuations;
5. Unauthorized individuals or security threats; and



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6. Other operational risks associated with program activities.

B. Additional Statutory Requirements for Licensed Youth Camps

For programs subject to Texas Health & Safety Code Chapter 141 and the requirements of the Heaven's 27 Camp Safety Act (SB 1) and the Youth CAMPER Act (HB 1), effective September 5, 2025, emergency plans shall additionally address applicable statutory requirements, including emergency warning systems, designated muster zones, camper safety orientations, and annual plan submission to DSHS as required by law. Program Operators shall coordinate with the PMC prior to program commencement to determine which statutory requirements apply.

C. Coordination with University Offices

Program Operators shall coordinate with appropriate University offices regarding emergency preparedness measures, communication protocols, and participant safety procedures, including the TSU Police Department and the Office of Emergency Management.

X. MANDATORY CHILD ABUSE REPORTING OBLIGATIONS

MANDATORY REPORTING — PERSONAL LEGAL OBLIGATION UNDER TEXAS LAW

Any individual who has reasonable cause to believe that a child has been or may be abused or neglected, as defined by Texas Family Code § 261.001, or is a victim of an offense under Penal Code § 21.11, shall report the matter directly to the Texas Department of Family and Protective Services (DFPS) or to local law enforcement.

1. Immediate Reporting Requirement

For University employees, program staff, volunteers, including student workers, interns, whether paid or unpaid, who have direct contact with minors in University programs or activities, **reports must be made not later than the 24th hour after first having reasonable cause to believe that a child has been or may be abused or neglected or is a victim of an offense** under Penal Code § 21.11. Failure to report is a Class A Misdemeanor under Texas Family Code § 261.109(d). Intentional concealment of abuse is a State Jail Felony under Texas Family Code § 261.109(e). **This is a personal, non-delegable legal duty.** Reporting to a supervisor, department head, University official, or any other person is insufficient and does not satisfy an individual's mandatory legal reporting obligations under Texas law.

For purposes of this MAPP, "individual" includes all University employees, program staff, counselors, volunteers, including student workers and interns, whether paid or unpaid, who have direct contact with minors in University programs or activities.

2. Reporting Protocols



(a) External Reporting: External reports shall be made directly to the following authorities:

- Local law enforcement: 911 for emergencies or immediate danger to a child
- Texas Department of Family and Protective Services (DFPS): 1-800-252-5400 (statewide hotline) or online at www.txabusehotline.org for non-emergency reports
- Other appropriate city, county, or state law enforcement agencies

(b) Internal Notification: After making the required external report, the individual shall promptly notify:

- Texas Southern University Police Department: 713-313-7000
- Programs for Minors Coordinator (PMC)
- Office of Enterprise Risk Management

Internal notification does not satisfy, replace, or delay an individual's legal obligation to report directly to external law enforcement and authorities.

3. Confidentiality

The University shall maintain the confidentiality of reports of suspected child abuse or neglect and related investigative information to the extent permitted by the Texas Family Code §§ 261.101 et seq., the Family Educational Rights and Privacy Act (FERPA), Title IX, and other applicable law. Confidentiality shall not be construed to limit the University's obligations to report to external authorities as required by law. Reports involving sexual abuse or assault of a minor shall also be reported to the University's Title IX Coordinator to enable required supportive measures and institutional investigation.

4. Protection from Retaliation

Retaliation, threats, harassment, or adverse treatment against any employee, student, volunteer, contractor, or other individual acting on behalf of the University making a report of suspected child abuse or neglect is strictly prohibited. This includes a prohibition on retaliation against any individual participating in an investigation, or otherwise complying with reporting obligations herein. This prohibition against retaliation applies irrespective of whether the report ultimately substantiates suspected abuse or neglect. A violation of this provision shall be subject to disciplinary action up to and including termination of employment or removal from program institutional roles, or termination of a third-party contract.

XI. ENFORCEMENT AND DISCIPLINARY SANCTIONS

Failure to comply with this policy shall result in corrective action, suspension of program activities, removal from participation in programs involving minors, disciplinary action, termination of contractual relationships, termination of employment, or other appropriate administrative action consistent with University policy and applicable law.

MAPP 04.03.02 Campus Programs for Minors and Youth Protection

Section: Operations and Public Safety

Area: Enterprise Risk Management

Original: 06/ 30/2026



TEXAS SOUTHERN UNIVERSITY
**MANUAL OF ADMINISTRATIVE
POLICIES AND PROCEDURES**

Violations involving suspected abuse, neglect, exploitation, criminal conduct, or participant safety concerns may additionally be referred to appropriate law enforcement or governmental authorities in accordance with [Texas Family Code Chapter 261](#).