Frequently Asked Questions

These FAQs are meant to address common questions regarding the University’s policy, Minors at Northwestern.

Who is subject to criminal background checks?
Program Staff, paid or unpaid, 18 years or older, who interact with, supervise, chaperone, or otherwise directly oversee minors in Covered Program activities. This includes, but is not limited to faculty, staff, volunteers, and temporary employees. A person having only the potential for incidental contact with a minor in commonly used areas shall not be considered Program Staff and will not be subject to background checks.

I am operating a program involving minors and the majority of Program Staff consist of NU and visiting non-NU student volunteers. Do I need to arrange background checks for these students?
If NU students are being paid by the University and therefore acting within an employment capacity, background checks should be requested. Any visiting non-NU student volunteers, whether paid or unpaid, would also need to undergo background screening prior to the start of the Covered Program.

Many Program Staff have already undergone extensive screening by their primary place of employment (e.g. school district or hospital). Do background checks still need to be run to comply with University policy?
Unless departments/units have access to this information from affiliate employers and can verify satisfactory results, background checks are still required for Program Staff.

My department routinely hires residential or admin staff at the last minute to ensure adequate supervisory ratios in our Covered Programs. Can they work pending the results of the background check?
Yes, as long as the background check process has been initiated prior to the Covered Program. Employment status will continue to be contingent on the results of the background check.

I am the President of XYZ Student Organization and we regularly work with minors as our mission is centered on educating and mentoring local high school students. Are members of my student organization subject to the Minors at Northwestern policy requirements of background checks and training?
Student Organizations are provided access to the required EverFi training course “Protecting Children” and are encouraged to take it in conjunction with annual requirements to maintain eligibility of their recognized status by Northwestern. Students are not subject to background checks unless employed or working in a Covered Program.

My department operates a Covered Program that involves travel and lodging of minors outside the State of IL. What are the reporting obligations of Program Staff when they become aware of suspected abuse and/or neglect of a minor in the Covered Program that occurs out of state?
If the suspected abuse or neglect is occurring outside Illinois, Program Staff are to contact both Illinois DCFS and the applicable state agency. In addition, Program Staff are to notify Office of Risk Management and the Office of Compliance, Audit, and Advisory Services in writing that a report has been made.

While operating a Covered Program outside the US, Program Staff may encounter challenges in reporting due to local culture or may feel uncomfortable since confidentiality laws and regulations may differ substantially from those in the United States. What options do they have?
Program Staff still have an obligation to report the matter to the University and if uncomfortable, can anonymously report through the third-party service, EthicsPoint. For additional information on how to report incidents of sexual misconduct to the University, please refer to Policy on Sexual Misconduct. For a complete summary of information regarding reporting and receiving support at the NU-Q campus, please refer to Appendix A in the Policy on Sexual Misconduct.

My Northwestern Covered Program contains a large percentage of temporary staff who have already undergone DCFS training. Can they be exempt from taking the EverFi “Protecting Children” course?
No, they will still have an obligation to take the EverFi course. There may be overlap between training courses, but the University believes the EverFi material to be more detailed on how to identify child abuse and/or neglect.
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Do Non-Northwestern Programs have to take the University required EverFi course?
No; however, they are required to complete training that meets or exceeds University standards as outlined in the Minors at Northwestern Policy. The online DCFS training will meet this equivalent.

How often should training be renewed?
The Minors at Northwestern policy suggests training be renewed periodically. Covered Programs are encouraged to renew training as often as needed in order to ensure Program Staff understand their obligations.

Program Staff in my Northwestern Covered Program include affiliate and student unpaid volunteers. I want these individuals to take the required training to ensure compliance with University policy, but they do not have access to MyHR Learn. What should I do?
The Office of Risk Management and HR can assist departments/units by providing external party accounts to individuals currently without network privileges. If the list of Program Staff submitted during the registration process does not contain necessary identification numbers (Net ID or Employee ID), Office of Risk Management will follow up with the program registrant to secure additional information in order to facilitate the process for an external party account.

Do annual programs need to be re-registered to the system every year?
Yes, however the system is designed to automate a portion of the registration process. The system will generate an email to the program director/supervisor asking him or her to confirm whether the information, including the list of Program Staff, can be copied over for the renewal term. At that time, the program director/supervisor will be required to update any forms, lists, and proof of background checks and training for any new Program Staff.

I would like to sponsor a non-Northwestern program involving minors on Northwestern’s campus. What do I need to do in order to do so?
Non-Northwestern programs that wish to operate programs or activities involving minors on Northwestern property must comply with University policy, including requirements related to reporting suspected abuse or neglect, completion of comparable training, and background checks. As Sponsor, you are required to register the Covered Program. At the time of registration, you will be asked to certify the Non-Northwestern organization(s) has conducted background checks that meet or exceed Northwestern’s standards. Certification should be obtained by the execution of a formal facility-use/license agreement.

Is a Facility-Use Agreement/License Agreement required for third-party organizations that use Northwestern facilities?
Yes, units/departments licensing, leasing, or allowing the use of University facilities by non-Northwestern entities for programs serving minors must include language in a binding agreement requiring the non-Northwestern entity to comply with the institutional policies on background checks, training, and minimum insurance requirements.

My department is allowing a third party to use some of our space for a program involving minors. My department is not a Sponsoring Unit, merely contracting for the use of our space. Should the Sponsoring Unit complete the registration online form or does my department need to fill it out?
The Sponsoring Unit is required to complete the procedures, including the online registration form. As the manager of the space, you share in the responsibility to inform the third party of its obligation to complete the procedures and ensure a proper facility-use agreement is in place.

How do I know if my situation is an “activity or program involving minors”?
To determine whether your situation fits the definition of a Covered Program, we suggest applying the three-prong test. Is it an activity or program that is operated by Northwestern? Is there at least one minor participant in it? Are parents and guardians not expected to be responsible for their children during activity or program? If the answer is yes to all three questions, look to the scope section of the Minors at Northwestern policy to determine next steps. If the answer is no to any of these questions, the policy generally does not apply. Any requests for clarification as to whether a particular program or activity is subject to the policy should be sent to the Office of Risk Management (elizabeth.marshall@northwestern.edu).