



Notes and Recommendations for Online Program Directors

1. *Background checks*: Background checks are required and, where obtainable, employees should undergo the standard three-part background check required by Pennsylvania law. However, pursuant to Act 18 of 2020, signed May 2020, the Commonwealth will permit employees who are unable to obtain the fingerprint-based federal (FBI) criminal history record to commence work under the following circumstances:
 - a. The individual has obtained the Pennsylvania criminal history and child-abuse clearance, and has been a Pennsylvania resident for the past 10 years, *or* the individual has obtained equivalent certifications from any other state in which he or she has resided in the past 10 years;
 - b. The camp administrator documents the reason why the individual has been unable to obtain the fingerprint-based federal criminal history record; *and*
 - c. The individual affirms in writing, using an affidavit in the form accompanying these recommendations (see below), that she or he is not disqualified from employment, i.e. has not been convicted of a disqualifying offense.

The foregoing constitutes a limited exception that will *expire* on December 31, 2020, or 60 days after the governor’s emergency declaration has been lifted, whichever comes first; thus any individual who remains employed past such time may *not* have direct contact with minors unless and until the three-part background check has been completed. If at any time a program becomes aware of information indicating an employee may possess a disqualifying criminal record, that person may not be allowed to continue to work. Questions regarding background checks should be directed to Jessica Lesovitz in the Office Human Resources (lesovitz@upenn.edu).

2. Programs must provide parents/guardians with notice of the websites and online services to be used for content delivery and engagement with program participants; such notice should include those websites’ and services’ notices of information and privacy practices (e.g. <https://zoom.us/privacy>).
3. Programs should clearly define all employees’ roles for the online environment, including supervisory responsibilities, who will “sit in” on program sessions, etc.
4. Program materials must provide clear instructions to parents/guardians on how to contact a person with authority for the program, including telephone contact information.
5. Programs must prohibit staff from interacting with participants online outside of program sessions; e.g., no “friending” youth using personal social media accounts; no texting from personal phones. (The use of official program social media accounts for messaging or content delivery to groups is approved.)
6. Program employees are forbidden from discussing during sessions personal issues, inappropriate online material, drugs or alcohol.
7. Program employees must be aware how to report any instances of online bullying or harassment consistent with Penn policy. Concerns regarding conduct of a potentially criminal nature must be taken to the Division of Public Safety, Special Services, at 215.898.4481. Other concerns must be documented on an incident report and forwarded to VPUL.



8. Requests for accommodations or modifications in program materials for the purpose of accessibility, if not easily granted, should be reviewed with the Office of the General Counsel.
9. Programs must require employees to use approved login credentials on approved service providers for content delivery and supervision of participants. Do *not* improvise with other technical services (e.g. Facetime on a personal phone).
10. Programs should consult with technical support to remain aware of risks from unregistered attendees (e.g. “zoombombing”).
11. Programs may record sessions to facilitate asynchronous learning, but should not capture, use, or disclose images or recordings of minors for any purpose other than asynchronous program content delivery or internal program quality evaluation.