

RISK MANAGEMENT GUIDELINES FOR UNIVERSITY OF CONNECTICUT COOPERATIVE EXTENSION SYSTEM EMPLOYEES AND VOLUNTEERS

INTRODUCTION

The University of Connecticut Cooperative Extension System (CES) annually engages thousands of people in educational programs that positively impact their lives and communities. Developing and implementing Extension education programs involves risks. A risk is any uncertainty about a future event that threatens an organization's ability to accomplish its mission (Nonprofit Risk Management Center, 1999). Eliminating all program risks is impossible, as they exist in everything that we do; however, the key is effective management of those risks (Ohio State University Extension Policy Handbook).

“Risk management is a discipline for dealing with the possibility that some future event will cause harm to people, property, income, or organizational goodwill.” (Nonprofit Risk Management Center, 1997). Risk management is critical for all Extension programs, functions, events, and activities. Extension faculty and program staff members and volunteers are responsible for the welfare and safety of the youths and others under their supervision.

There are various methods, precautions, and other considerations that should be used by volunteers, University of Connecticut employees, and others to manage risks (Procedures and Guidelines for the Cooperative Extension System, 1998; Connecticut 4-H Volunteer Handbook, Building People, 2001; Extension Disaster Education Network <http://www.eden.lsu.edu/>).

The University of Connecticut is the Land Grant University for the State of Connecticut. As a State institution, the University's faculty and staff members are State employees who are subject to the laws, regulations, and rules of the State.

This document presents information and strategies that will help University of Connecticut CES employees and volunteers to better understand and manage risks in Extension programs. Knowledge of legal protection provided to volunteers and State employees is also an important consideration. Though much of the information presented below focuses on the 4-H Program, the concepts and principles would apply to most Extension employees, volunteers, and programs.

EMPLOYEE & VOLUNTEER LIABILITY

CONNECTICUT

There are several State of Connecticut laws that provide State employees and volunteers with protection from liability, unless such damage or injury was caused by the willful or wanton misconduct of such person.

<http://www.cga.ct.gov/2005/pub/Titles.htm>

<http://www.jud.state.ct.us/lawlib/>

Connecticut General Statutes, Chapter 53, Claims Against the State. The chapter notes that:

“The legislative intent expressed by this chapter is that an employee is immune when the state is sued and that the state may be sued in instances where a private person would be liable.”

Chapter 53, Sec. 4-165 provides that:

“No state officer or employee shall be personally liable for damage or injury, not wanton, reckless or malicious, caused in the discharge of his duties or within the scope of his employment. Any person having a complaint for such damage or injury shall present it as a claim against the state under the provisions of this chapter.”

<http://www.cga.ct.gov/2005/pub/Chap053.htm>

Chapter 53, Sec. 4-141 notes that:

“state agency” includes every department, division, board, office, commission, arm, agency and institution of the state government, whatever its title or function; and “state officers and employees” includes every person elected or appointed to or employed in any office, position or post in the state government, whatever such person’s title, classification or function and whether such person serves with or without remuneration or compensation,...

<http://www.cga.ct.gov/2005/pub/Chap053.htm#Sec4-165.htm>.

This includes volunteers of record (registered volunteers) of the University of Connecticut Cooperative Extension System.

Connecticut General Statutes, Chapter 925, Statutory Rights of Action and Defenses, Sec. 52-557m, Immunity from liability of directors, officers and trustees of nonprofit tax-exempt organizations.

“Any person who serves as a director, officer or trustee of a nonprofit organization qualified as a tax-exempt organization under Section 501(c) of the Internal Revenue Code of 1986, or any subsequent corresponding internal revenue code of the United States, as from time to time amended, and who is not compensated for such services on a salary or prorated equivalent basis, shall be immune from civil liability for damage or injury occurring on or after October 1, 1987, resulting from any act, error or omission made in the exercise of such person’s policy or decision-making responsibilities if such person was acting in good faith and within the scope of such person’s official functions and duties, unless such damage or injury was caused by the reckless, willful or wanton

misconduct of such person.”

<http://www.cga.ct.gov/2005/pub/Chap925.htm#Sec52-557m.htm>

Connecticut General Statutes, Chapter 925, Sec. 52-557b, "Good Samaritan law."

“Immunity from liability for emergency medical assistance, first aid or medication by injection. School personnel not required to administer or render. (a) A person licensed to practice medicine and surgery under the provisions of chapter 370 or dentistry under the provisions of section 20-106 or members of the same professions licensed to practice in any other state of the United States, a person licensed as a registered nurse under section 20-93 or 20-94 or certified as a licensed practical nurse under section 20-96 or 20-97, a medical technician or any person operating a cardiopulmonary resuscitator or a person trained in cardiopulmonary resuscitation or in the use of an automatic external defibrillator in accordance with the standards set forth by the American Red Cross or American Heart Association, who, voluntarily and gratuitously and other than in the ordinary course of such person's employment or practice, renders emergency medical or professional assistance to a person in need thereof, shall not be liable to such person assisted for civil damages for any personal injuries which result from acts or omissions by such person in rendering the emergency care, which may constitute ordinary negligence.” <http://www.cga.ct.gov/2005/pub/Chap925.htm#Sec52-557b.htm>

Note: The Good Samaritan laws protect only individuals who are properly certified and trained to administer emergency care.

FEDERAL

Volunteers are also protected by the Federal [Volunteer Protection Act of 1997](#). The Act grants immunity from personal liability to those who volunteer for non-profit organizations. The intent is to encourage volunteerism and facilitate volunteer organization recruiting by reducing the legal liability risks to individuals who choose to serve. The law preempts inconsistent state laws by standardizing protection that now varies greatly from state to state.

The law does not allow punitive damages to be awarded against a volunteer unless the harm was caused by willful or criminal misconduct, or by conscious, flagrant indifference to the rights or safety of the claimant.

The Volunteer Protection Act of 1997 defines a “volunteer” as someone who provides service for a non-profit and is not compensated, other than being reimbursed for expenses or anything of value under \$500 a year. The Act defines non-profits as 501(c) (3)'s under the 1986 Internal Revenue Service Code, as any not-for-profit organization for public benefit and operated for charitable, educational, religious, welfare or health purposes.

Some of the Federal Volunteer Protection Act's key provisions include:

Liability Protection of Volunteers

With certain exceptions noted below, the Act provides that volunteers for nonprofit organizations or governmental entities cannot be sued for actions taken during their work for the organization or entity if:

- (1) the volunteer was acting within the scope of the volunteer's responsibilities in the nonprofit organization or governmental entity at the time of the act or omission;
- (2) if appropriate or required, the volunteer was properly licensed, certified, or authorized by the appropriate authorities for the activities or practice in the state in which the harm occurred, where the activities were or practice was undertaken within the scope of the volunteer's responsibilities in the nonprofit organization or governmental entity;
- (3) the harm was not caused by willful or criminal misconduct, gross negligence, reckless misconduct, or a conscious, flagrant indifference to the rights or safety of the individual harmed by the volunteer; and
- (4) the harm was not caused by the volunteer operating a motor vehicle, vessel, aircraft, or other vehicle for which the state requires the operator or the owner of the vehicle, craft, or vessel to (A) possess an operator's license or (B) maintain insurance.

Exceptions to Liability Protection for Volunteers

The Volunteer Protection Act does not immunize volunteers from liability for crimes of violence, hate crimes, sexual offences, violations of civil rights laws, or actions taken under the influence of drugs or alcohol.

No Additional Liability Protection for Organizations

The Volunteer Protection Act of 1997 provides liability protection to volunteers only; it does not alter current law governing lawsuits against the nonprofit organizations themselves, including lawsuits against nonprofits based on actions of volunteers.

Preemption of Less Stringent State Laws

The Volunteer Protection Act "preempts" conflicting state laws that provide less protection to volunteers. That means that with any lawsuit involving a volunteer, the Federal law - not any conflicting state law - applies, unless the state law provides volunteers with protection in addition to those provided by the Federal law. The only exceptions to this are:

1. State laws excepting lawsuits by state or local governments are not preempted;
2. State laws conditioning a limitation of liability on the requirements that nonprofit organizations provide a source of recovery for people harmed by volunteers are not preempted.

3. State legislatures are allowed to pass a law declaring the Volunteer Protection Act inapplicable to state court actions involving exclusively the citizens of that state. The Connecticut State Legislature has not passed such a law as of this time.

UNIVERSITY OF CONNECTICUT POLICIES

The University of Connecticut has specific policies (<http://vm.uconn.edu/~wwwode/>) on: anti-discrimination and civil rights; affirmative action; diversity; people with disabilities; harassment; providing reasonable accommodations; providing information in alternative formats; and non-discrimination policy statements for publications, printed materials, and electronic media that, as a representative of the University, affect one as an employee or volunteer.

Individuals, organizations, and associations who partner with the University of Connecticut Cooperative Extension System (CES) are responsible for supporting equal access and upholding and participating in the legal policies and regulations of the University. Please see the document, "Connecticut 4-H Volunteer Handbook, People Building, 2001," for additional information pertinent to volunteers in Connecticut. <http://www.canr.uconn.edu/ces/fourh/images/4-H%20VolManual.pdf>

Registered 4-H Volunteer & Agreement Form

To be considered a registered 4-H volunteer in Connecticut, one must have an approved 4-H Volunteer Application Form on file in the County Extension Center. To continue as a registered volunteer, one must annually update their volunteer status and information on file. <http://www.canr.uconn.edu/ces/fourh/forms.html>.

A copy of this "risk management guidelines" document should also be provided to each registered 4-H volunteer. The 4-H Volunteer Application Form; the Connecticut 4-H Volunteer Handbook, Building People; and this risk management guidelines document outline the responsibilities one assumes as a 4-H volunteer. The signed forms will remain on file with the 4-H office at the County Extension Center from which the program is coordinated. 4-H volunteers must be formally appointed (registered) and must have clearly defined tasks and responsibilities. As presented on the application form, volunteers will agree and conform to the following volunteer responsibilities:

- Participate in appropriate 4-H volunteer training.
- Conduct 4-H volunteer activities in compliance with University of Connecticut and Cooperative Extension System policies and guidelines.
- Keep 4-H Extension staff members, for whom you volunteer, informed of group and project activities including field trips, fund raising events, websites, and other special activities.

- Submit annually to the appropriate 4-H Extension staff member, up-to-date enrollment information for the 4-H members and other program participants that you direct. All 4-H members must have a current 4-H Enrollment Form on file in the appropriate County Extension Center. A 4-H Enrollment Form must be completed each year that a member is enrolled.
- Welcome all youths, families, adults, and other volunteers to participate in the program regardless of race, color, national origin, religion, sex, age, sexual orientation, or disability.

Handling 4-H Funds

4-H volunteers and leaders must abide by the University of Connecticut CES guidelines for handling funds in the name of 4-H (Procedures and Guidelines for the Cooperative Extension System, 1998).

- USDA copyrights the 4-H name and logo. Extension directors are charged with reporting any violations of the 4-H name and emblem and with procedures for controlling funds collected for 4-H programs.
- Accepting gifts to the 4-H program implies a willingness to accept responsibility for handling funds accountably. Each 4-H unit/club handling funds received under the 4-H name and emblem must maintain a system for receiving, disbursing and auditing funds. Each individual 4-H unit/club must hold funds in a separate bank account in the club/unit's name.
- Under no circumstances may an individual hold funds raised in the name of 4-H. All checks must be payable to an official 4-H organization, unit, or club and directly deposited into the appropriate account.
- All private contributions intended for 4-H use from individuals, corporations, foundations, and fund raising activities designated for local use shall be managed through a local 4-H fund account separate from the County Extension Center accounts, and not maintained by UConn Extension personnel.
- Establish a system of accounting for handling group funds, which has supervision by more than one person or family. Have annual audits of funds. Do not use petty cash or shoebox operations.
- In accordance with the laws governing nonprofit organizations, if your group disbands, all money in the group treasury and any other group property can only be given to another nonprofit organization, not to individuals. Since 4-H group funds were attained in the name of 4-H, they should be given to a local 4-H organization (such as 4-H advisory councils, 4-H foundations or 4-H fair associations, etc). To arrange this, contact the County 4-H staff member.
- All local 4-H funds and the Connecticut 4-H Development Fund accounts should be managed to provide donor and Extension educator protection. Guidelines are as follows:
 - a. Local 4-H fund guidance shall be provided through a committee of local partners accountable to the local 4-H committee/foundation.
 - b. A set of written operational procedures is essential.
 - c. An annual budget must be developed and utilized.

- d. An accounting system for each donor's gift, recognition, and donor history must be institutionalized.
- e. Accountability should be maintained through a monthly statement to the committee and the local Extension staff member for the purpose of monitoring the account. An annual audit is necessary. Use of an appointed internal audit committee or a professional accountant should be a regular practice.
- f. The treasurer is authorized to sign checks when approved and documented within committee minutes or with written authorization by the executive committee of the group.
- g. An annual report of donors and financial statement should be made to the local 4-H committee, their donors, the County Extension Center, and UConn Extension administration to meet Federal requirements for reporting non-tax dollars raised in support of Extension programs.

For further information, see the documents: *"4-H Name and Emblem: Guidelines for Authorized Use"* and *"Tax-Exempt Status of 4-H Organizations Authorized to Use the 4-H Name and Emblem."*

4-H Fair Books

All 4-H fair books must include a statement that is similar to the following: *"During the Fair all exhibits are under the direction of the appropriate 4-H Fair Association, who will exercise every reasonable care in the protection of exhibits. In no case will the said fair association or management be responsible for any loss or damage that may occur. Each exhibitor will be solely responsible for any loss, injury or damage to any animal; or loss, injury or damage done by or arising from any animal exhibited by him/her and shall indemnify said Fair Association against legal or other proceedings in regard thereto."*

4-H Animal Project Verification

The following statement must be included on all Connecticut 4-H Animal Project Verification Forms (<http://www.canr.uconn.edu/ces/fourh/forms.html>)

"All 4-H project animals are shown, and otherwise used, at the risk of the 4-H member. Any damages to persons or property caused by an animal are the legal and financial responsibility of the 4-H member and family who leases the animal."

Additionally, the following two paragraphs shall be added to all Connecticut 4-H Animal Project Verification Forms where a 4-H member will be leasing an animal for use in a project.

"An individual who leases (lessor) to a 4-H member an animal to be used as a 4-H project does so as the owner of the animal and not as a 4-H volunteer. The lessor of an animal is not automatically considered to be a 4-H volunteer. Being a 4-H volunteer involves actions independent of leasing an animal. It is assumed that the owner of the leased animal has insurance coverage on the animal. The lessee of the animal is advised to check to see if the family's personal property

insurance policies cover the animal during the duration of the lease. The 4-H organization, including its volunteers, assumes no financial or legal liability for an animal involved in the 4-H program and is not legally involved in the writing, implementation or termination of the lease.”

“By signing below, the 4-H member, parent/guardian, and owner of the leased animal understand that this is an agreement among only the parties signing the contract. The agreement does not include the 4-H Organization or its volunteers.”

Liability Insurance Coverage

Occasionally, the purchase of insurance is required to protect a facility or property owner from potential costs associated with damage or accident occurring during an event held on that property. The owners could be considered liable for a dangerous condition, even if they were unaware of any problems. This is different than medical accident insurance, which covers costs for specified amounts of medical assistance. Obtaining insurance policies, however, is not a substitute for sound risk management practices and training that minimize hazards and problems. Use good judgment and common sense when requesting insurance, and be mindful that taxpayer money is supporting its purchase.

Not all property owners need or require additional insurance. The State does not typically need to purchase a policy to cover an event at another State facility. For example, an Extension meeting held at Manchester Community College would not need coverage because the property is owned by the State. In other cases, such as some town facilities, policies already exist to provide liability coverage. Other facility owners may request that Extension purchase insurance to limit liability exposure and risk to themselves and their property.

Situations occur where an Extension educator may wish to have a State policy for an event even though the owner does not ask for such coverage. An example would be, obtaining a policy to cover a horse training event at a 4-H camp during the off season. The insurance would minimize the higher risk being taken by a valued partner. High or unusual risk situations may require seeking additional input or advice from the Insurance Officer or Business Office at the University of Connecticut, College of Agriculture and Natural Resources (CANR).

Not all events qualify for the State liability insurance coverage. Other insurance options may exist for events not covered. After an extensive review by the State Insurance Purchasing Board and the Attorney Generals office in the 1980's, the following policy was adopted:

- The event must be in support of educational objectives.
- The event must be offered with no fees from the participant other than the recovery of the cost of program materials or services.
- The event must be a not for profit activity.

- The event must be directly or indirectly supervised by an Extension professional.

Therefore, the State will not purchase liability insurance for other non profit groups, such as 4-H fair associations, Extension councils, or for fundraisers; and the event must be educationally relevant as defined within the Extension mission. The supervisory requirement statement establishes the connection to UConn Extension as a State program.

A simple form is available from the Extension Centers that outlines the information needed to request State liability insurance coverage. The Extension educator who is responsible for the event, and their supervisor, both need to sign the form. Request forms for State liability insurance MUST include the location where the event will be held, AND the name and address of the property owner who will be listed on the policy. This entity or person is known as the “additional insured.”

The completed form is then forwarded with an approval letter from the UConn CANR Insurance Officer or Business Office to a State processing office for final approval and issuance. Standard policies are established as a “rider” to an existing State policy, and this has shortened the waiting period for obtaining policies (four days to two weeks on average). There is no set processing time; however, so planning ahead is essential. Special or unusual policies will take longer to obtain.

A Certificate of Insurance is normally obtained, which is accepted as the proof that a policy has been issued for the event. One can have a policy in affect without a certificate of insurance being issued, so it is not mandatory. Issuing a certificate of insurance is usually done at the request of the facility owner. Most certificates are now sent electronically as a PDF file to the Extension educator, with a paper back-up copy arriving later and kept on file in Storrs. It is the responsibility of the Extension educator to share the certificate of insurance with the facility owner.

The standard policy that Extension obtains indicates that the State is self insured for a certain amount of money (currently \$4 million) before the general policy takes effect. What this means is the State has a reserve to cover up to that amount before the purchased company policy comes is used. This policy is administered by an insurance agent and operates just like any commercial policy. The general overall limit on the standard policies is \$10 million. This amount can change however, and any special requirements should be listed on the form provided.

Extension educators may be asked by facility owners to sign contracts, when making arrangements for an event, which may contain language that insurance will be obtained. Contracts that contain so called “hold harmless” clauses or indemnification clauses cannot be signed by State employees without the

permission of the attorney general. In fact, a valid insurance policy is much more valuable than any statement signed to the facility owner. Extension has had great success in striking parts of contracts and having them accepted by the facility owner. When questions arise, advice should be sought from the CANR Insurance Officer.

LEADERSHIP & SUPERVISION

- Never leave children or youths unsupervised.
- Use the "buddy system," which encourages participants to take responsibility for themselves and for each other.
- Always be alert to potential dangers and risks.
- Provide thorough orientation for youths, parents and other volunteers that you supervise.
- Make sure all participants, including parents, know all the rules.
- Review safety rules and proper procedures with participants before starting an activity.
- Review rules of conduct at the beginning of activities, and establish a procedure for handling infractions. This should be done with member participation. A current Code of Conduct Form signed by both the 4-H member and their parent/guardian must be signed and submitted each year along with the 4-H Enrollment Form.
- Handle any rule or procedural infraction in a timely manner.
- Any form of physical punishment is prohibited.
- Provide an adequate number of adult supervisors, especially when involved in activities with high levels of risk (such as horse shows, swimming, working with power tools, etc.).
- Make sure families are aware of special activities that you are planning. 4-H volunteers and leaders are strongly encouraged to use a modified version of the Code of Conduct Form for specific activities in which there is an inherent risk. Such activities may include, but are not limited to, sledding parties, trips that involve transportation by a vehicle, and experiences with animals, including those that are leased or otherwise not owned by the 4-H member.
- Refer to the earlier section of this document, "Handling 4-H Funds."

SAFETY & HEALTH

Permission and Health Forms <http://www.canr.uconn.edu/ces/fourh/forms.html>

- Use Permission Forms. A signed form giving the parent or guardian's permission assures that the parent or guardian is aware of the event, location and risk involved. Permission forms must include the following statement:
"I understand that some of the activities in which my child may choose to be involved may have inherent risks associated with them. I accept

responsibility for my child's actions and shall indemnify the 4-H organization and its volunteers against legal or other proceedings in regard thereto."

- A Health Information Form may be required for certain events.

Both forms are available at the County Extension Center.

Safety Guidelines for 4-H Volunteers

The role of safety in the 4-H program can not be underestimated. In all of our work with young people, we have a responsibility to them and their families to provide a safe environment. By following a few simple guidelines, one can provide such an environment.

For all project areas project areas, the following guidelines should be followed:

1. The volunteer(s) will review the project and the planned program of activities to identify areas of potential risk. Once identified, a written plan to minimize these risks will be in place, understood, and practiced by all leaders involved in the project.
2. Adult volunteers will develop a guideline to determine appropriate actions during an emergency. Emergency drills will be practiced, where appropriate.
3. The 4-H project will start with a discussion of the safety and health procedures for the project that one should follow. Written safety procedures should be distributed to participants where appropriate.
4. Each 4-H member will demonstrate that he/she fully understands and can follow the established safety guidelines for that project.
5. All machines or equipment used with the 4-H project will be in good repair with all safety features (guards, safety switches, etc) in place and functional. An adult leader will check the equipment prior to use.
6. Protective safety equipment will be worn when recommended or advised. State guidelines regarding safety equipment will be followed. In all cases, the following safety equipment will be utilized:
 - a) Protective flotation devices will be used by all youth when they are on the water.
 - b) Safety helmets meeting the American Society for Testing and Materials (ASTM) Safety Equipment Institute (SEI) guidelines (<http://www.equestrian.org/rules/helmetrule.htm>) will be worn by all youth when mounted upon, or being pulled by, one or more equine animals.
 - c) State law requires that youth under the age of 12 wear safety helmets when riding a bicycle on state highways.
 - d) Safety goggles will be used by youth when using power tools.
7. All equipment will be appropriate for the age, size and ability of the participants.
8. A first aid kit should be available at the meeting, event or activity site.
9. In all 4-H programs, the volunteer should understand the proposed program activity, know the experience and qualifications of the volunteers involved, understand the skill level of the youths involved, and assess the degree of risk before acting. All volunteers are to act in a responsible manner where 4-H and other Extension programs are concerned.

10. Leaders are strongly encouraged to have mentors, or all adults present, sign in when attending all meetings, and to maintain a file of these sign in sheets.

Transportation

- Require adequate insurance coverage (see Insurance Section).
- Parents or guardians will assume responsibility for the transportation of their children to 4-H program, meetings, functions, or events. Any car pooling arrangements should be established and agreed upon in advance by the parents/guardians of the children involved.
- The law requires that everyone use a seat belt. Do not overload cars and do not allow members to ride in the back of pickup trucks, as it is against the law.

Emergency Procedures

- Care for the injured person.
- Call for emergency professional help, if needed.
- Contact parents/guardians by the fastest means possible.
- Follow the parent/guardian's instructions about obtaining medical care. If unable to contact the parent or guardian, refer to the health form for emergency contacts. If none are available, use your best judgement.
- Stay calm. Eliminate confusion and fear. Have other adults handle the other members present.
- Assemble the facts, and verify them from different sources. These may be needed for a report. Notify the appropriate Extension staff member(s) of the incident.
- If the media is involved or is likely to be involved, designate one person to speak with them. Usually, this is the Extension staff member or another University of Connecticut spokesperson, such as the Media Communications Director (**860-486-3530**) in the University of Connecticut Communications Office. Protect the privacy of any injured person(s) and that of the other members of the group.
- Involve the county 4-H Extension staff member and the UConn Media Communication Director (see above) in processing any follow-up insurance claims, legal issues, or media coverage.

Child Abuse

- When supervising or involved in any activity with children, have at least three adults and/or youths present at all times.
- If you suspect that a 4-H member is being abused, contact your county 4-H Extension educator for guidance in reporting.

Harassment/Discrimination (<http://vm.uconn.edu/~wwwode/>)

- Harassment and discrimination are against University of Connecticut, State, and Federal policies. Included is harassment or discrimination on the basis of race, color, national origin, religion, sex, sexual orientation, age, or disability.

- Avoid any verbal, written, graphic, or physical conduct, which might bring emotional, psychological, or physical harm or explicitly degrade any individual.
- Educate 4-H members, parents/guardians, and volunteers on working with diverse audiences.

Connecticut 4-H Complaint Resolution Procedure

All disagreements or complaints between 4-H youths, parents/legal guardians, or volunteers regarding program policies and procedures are best resolved at the county or local level. Where such efforts have been unsuccessful, the Connecticut 4-H Complaint Resolution Procedure is used to provide an effective, fair, and timely method for addressing complaints. The process may be viewed at:

<http://www.canr.uconn.edu/ces/fourh/documents/ComplaintResolutionProcedure.pdf>.

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