

MEMORANDUM

To: Steve McKinley, 4-H Extension Specialist, Leadership and Volunteerism
From: Trent Klingerman, Deputy General Counsel 
Date: August 25, 2021
Re: 4-H Shooting Sports Programs

This Memorandum responds to your inquiry asking whether a formal exception from university policy IV.B.1, Use of Facilities (“Facilities Use Policy”) is required in order for current and long-existing 4-H Shooting Sports programs to continue to incorporate the use of firearms and archery equipment as a part of their educational programming. Based on the following analysis, I do not believe a formal exception from the CFO is required because the 4-H Shooting Sports programs are “university activities” operated under the supervision of “University representatives” and are, therefore, permitted under the Facilities Use Policy.

History and Overview

Purdue Extension, 4-H Youth Development has safely operated the Indiana 4-H Shooting Sports program for approximately 40 years. Thousands of students participate in 4-H Shooting Sports in Indiana, joining approximately 500,000 nationwide. The National 4-H Shooting Sports program follows national guidance and strictly adheres to best practices as youth learn marksmanship, the safe and responsible use of firearms, and develop life skills, self-worth, and conservation ethics. The program’s standards outline requirements for instructor certification, personal protective equipment, inventory control, storage, transportation, and youth and adult participation.

All shooting sports activities are under the supervision of trained, certified Purdue University 4-H volunteers and staff. Indiana 4-H partners with the Indiana Department of Natural Resources - Hunter Education, Law Enforcement Division, to implement the Indiana 4-H Shooting Sports program. Many activities are conducted in or on land that is owned, leased or occupied with permission by Purdue, Purdue Extension, or a related Purdue 4-H entity. Purdue insures all program activities through its Office of Risk Management.

Facilities Use Policy

The Facilities Use Policy applies to “[a]ny University owned, leased, used or occupied building or structure, or any land or infrastructure owned, used or leased by the University. (Facilities Use Policy, Definition of “University Facility(ies)”). The policy prohibits “[t]he possession . . . of . . . guns or other deadly or dangerous . . . weapons . . . , unless specifically authorized by the CFO, Chancellor or authorized representative, or required by *or used in the course of a University activity and under the supervision of a University representative.*” (Facilities Use Policy, Part II.C.) (emphasis added).

The Facilities Use Policy does not specifically define “University representative.” For purposes of Purdue policies, “University” is defined to include: “[a]ny campus, unit, program, association or entity of Purdue University, including but not limited to Purdue University Fort Wayne, Purdue University Northwest, Purdue University West Lafayette, *Purdue Extension* and Purdue Polytechnic Statewide.” (Policy Glossary, Definition of “University”). “Representative” is not defined by university policy, but generally means one who is chosen or appointed to act for another.

Purdue Extension should feel free to retain this memorandum as documentation why no formal exception is required. This is not a privileged attorney-client communication and can be shared as a public document.