The University of Pennsylvania’s Institutional Animal Care and Use Committee (IACUC) has adopted the following policy to define the responsibilities of the Principal Investigator (PI) conducting animal research, teaching, or testing. Penn’s IACUC is charged with ensuring that all animal use procedures meet the criteria set by the federal regulations, including the Animal Welfare Act and Regulations (AWAR), and the Public Health Service Policy (PHS). The PHS requires institutions to comply with the performance-based standards in the Guide for the Care and Use of Laboratory Animals (Guide).

The PI is defined as the person “responsible for a proposal to conduct research and for the design and implementation for research involving animals” (AWAR). The Guide and the PHS also refer to the PI being the person who is able to make or take part in decisions regarding important topics such as managing a vivarium, disaster planning, end of life/study judgments, etc.

This policy provides guidance to the research community regarding the criteria an individual must possess in order to be the PI on an IACUC protocol.

**FACULTY CATEGORIES**

In order to serve as a PI on a Form A protocol for work with research animals, a privately owned animal protocol (POAP) for work with client-owned animals, or an Offsite Application for the funding of animal work at another institution, the individual must fall under one of the following categories for faculty, as defined in the Faculty Handbook.

- **Standing Faculty**
  - Tenure or tenure-probationary status
  - Clinical-Educator
  - Emeritus faculty who are maintaining an active research program

- **Associated Faculty**
  - Research faculty
  - Academic Clinician

**FACULTY RESIDENCY AND TRANSITIONS**

The protocol PI is expected to be responsible for and to oversee personally the animal work on their protocol. To be effective in this role, they should be based in and have a physical presence in the local area. Therefore, any faculty member who remains a member of the Standing or Associated Faculty at Penn but who will relocate and be absent from the Philadelphia area for a period of more than six months (e.g., for a sabbatical) must appoint another eligible Penn faculty member as the PI or Co-PI of the protocol. This appointee will be designated as the responsible person to oversee the animal work.

For faculty who are transitioning their research program and animals away from Penn, a timeline must be submitted to the IACUC with an expected customary transition period of three months. After three months, animals may be transferred to a ULAR holding protocol or euthanized and the protocol may be terminated, unless an extension is granted by the IACUC.
TRAINING

Regardless of the position or role on an IACUC protocol, all research personnel (not including business administrators) are required to complete Penn Profiler, Regulations and the IACUC, and the appropriate Occupational Health and Safety online training. PIs may be assigned either the “Scientific Advisor” or “Scientist” role on an ARIES protocol.

- “Scientific Advisors” will not be handling animals and will not perform any animal procedures, but will provide general oversight and guidance for the research and will likely be the grant recipient funding the work. These “Scientific Advisor” PIs are additionally required to complete only the online species-specific training for the species used on the protocol.
- “Scientists” will be handling animals and performing procedures. Therefore, “Scientist” PIs are required to complete all training related to the procedures in which they will directly participate on the protocol (e.g., Aseptic Technique for surgical procedures, CO₂ Euthanasia in Rodents for euthanasia of rodents with CO₂, Conditionally Acceptable Methods of Euthanasia for certain euthanasia procedures not using anesthesia, etc.).

Additional training may be necessary as regulations and guidance change, new policies are adopted, or for the resolution of compliance issues.

EXEMPTIONS

Exemptions to the policy may be requested to the IACUC Chair or OAW Director for a case-by-case consideration by the full IACUC membership at a convened meeting.