## UC SANTA BARBARA

Institutional Animal Care and Use Committee

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https://www.research.ucsb.edu/animal-subjects/about

IACUC GUIDELINE: WHO QUALIFIES TO BE A PI

DATE IMPLEMENTED: June 14, 2010

DATE(s) REVISED: November 7, 2014; August 31, 2020

The Principal Investigator (PI) as defined in the USDA Animal Welfare regulations is "...an employee of a research facility, or other person associated with a research facility, responsible for a proposal to conduct research and for the design and implementation of research involving animals." At UCSB, the definition is expanded to include other employees or visiting academics affiliated with the Institution that are engaged in directing research programs or instructional activities involving animals, or in directing animal facility functions.

The protocol PI is the individual most responsible for the study (or educational mission associated with the course or activity), and presupposes a level of knowledge, experience, authority and accountability to ensure the scientific and regulatory integrity of the study. Therefore, only those individuals, who hold a faculty appointment (including visiting faculty), or a professional researcher or instructor position (e.g., Academic Coordinator), may be the PI on an animal protocol. Graduate student researchers, teaching assistants and post-docs are not permitted to serve as PIs, so any research or teaching activities they conduct must be covered on a protocol held by an appropriate PI that accepts full responsibility for this oversight.

All protocols must be reviewed by the IACUC, when the suitability of the PI will be considered in the context of evaluating the proposed regulated activities. PIs are also responsible for the training and oversight of any animal user who may work on the protocol. All protocol PIs, regardless of whether they conduct any of the work with animals themselves, must complete the UCSB Basic Training Modules every three years. Occupational Health and Safety Program enrollment may be waived if the protocol PI states, in writing to the IACUC, that they will never come into contact with vertebrate animals in the vivaria, research laboratories, or the field.

The IACUC is responsible for all vertebrate animal activities at UCSB or involving UCSB resources, including those activities that may not require a protocol as defined by PHS Policy and/or USDA Animal Welfare Act. For these "Animal Activities", vertebrate animals may be used or affected indirectly by researchers or instructors as part of a study. A more detailed description on what qualifies as an Animal Activity is in the 'Do I Need A Protocol?' form. The PI of an IACUC-reviewed Animal Activity is the individual most responsible for the study (or educational mission associated with the course or activity) and should hold a faculty appointment (including visiting faculty), or a professional researcher or instructor position (e.g., Academic Coordinator). Graduate student researchers, teaching assistants and post-docs are not permitted to serve as PIs, so any research or teaching activities they conduct must be covered on an Animal Activity held by an appropriate PI that accepts full responsibility for this oversight. The Animal Activity PI does not necessarily need to have a background in science, depending on the study, and should defer to the Attending

Veterinarian and IACUC's recommendations. However, the full responsibility of overseeing the Animal Activity, and any personnel conducting the activity, does still belong with the PI. During the review of the Animal Activity, the IACUC will determine whether the PI has the appropriate level of authority to properly oversee the proposed activities.