

# POLICY ON UNDERGRADUATE STUDENTS, HIGH SCHOOL STUDENTS AND NON-AFFILIATES PARTICIPATING IN RESEARCH IN PENN RESEARCH FACILITIES

For the purpose of this policy, non-affiliates are individuals who are *not* University of Pennsylvania faculty, staff, graduate students or post-doctoral trainees. The Principal Investigator is responsible for assuring that all students and non-affiliates working in his/her laboratory are appropriately trained, supervised and comply with the requirements of this policy. At a minimum this training must include Profiler and all training determined by Profiler such as EHRS, HIPAA, IACUC, etc.

- *Students who are not yet in High School are not permitted to participate in laboratory activities.*
- *Non-affiliates may not serve in laboratories as unpaid volunteers or trainees without University approval.*

This policy applies to the three categories listed below.

**A. High School Students (HSS):** HSS are permitted to participate in laboratories at Penn provided that all of the following conditions are met and none of the prohibitions set forth in item (7) are violated.

1. All programs for HSS must comply with the requirements described in the Vice Provost for University Life current year's "Special Summer Programs Protocols."
2. Each HSS must have a Principal Investigator or Sponsor who agrees to supervise and be responsible for the HSS while the student is present in the laboratory. The HSS must be appropriately supervised at all times when in the laboratory.
3. HSS may not be employed in laboratories nor perform the duties and responsibilities of an employee. (HSS participating as trainees in officially sanctioned and approved programs may receive a stipend in connection with the program.)
4. A Consent/Signature sheet must be submitted to the Principal Investigator/Sponsor with signatures from the HSS and his/her parents.
5. The Principal Investigator/Sponsor must provide the HSS with hazard specific information and appropriate personal protective equipment and instruct the student in its use and disposal.
6. Each HSS must attend Laboratory Safety training provided by EHRS before the laboratory activity begins. If a student is working in a lab where radioactive materials are used, Radiation Safety Training is also required.
7. HSS are not permitted to participate in the following activities in laboratories:
  - i. Any laboratory or facility designated as BSL-3
  - ii. Any laboratory or facility in which Select Agents or Explosives (as defined in OSHA Hazard Communication Standard Appendix B) are used or stored.
  - iii. Work with acutely toxic substances or reproductive hazards (as defined in OSHA Hazard Communication Standard Appendix A).

- iv. Operate farm machinery
  - v. Work in machine shops
8. HSS are permitted to participate in the following activities only after completing specialized training:
    - i. Work with recombinant or synthetic DNA (EHRS r-s-DNA online training)
    - ii. Limited work with radioactive materials is permitted. Work must be performed under the supervision and in the physical presence of a trained radiation worker. Only H-3, C-13, P-32 and S-35 in amounts less than 100 uCi may be used.
    - iii. HSS who will work with live animals must be associated with a specific ARIES animal research protocol, have their qualifications or training described and the specific procedures that they will be performing/assisting identified. Prior to working with animals, HSS must complete all necessary IACUC-related training associated with the HSS' role on the protocol.
    - iv. HSS who will work with non-human primates or tissue/body fluids from non-human primate must complete specialized IACUC-related training in addition to standard training for other species.

**B. Undergraduates (UG):** UG from Penn or from other institutions are permitted to participate in laboratories at Penn provided that all of the following conditions are met and none of the prohibitions set forth in item (4) are violated.

1. Each UG must have a Principal Investigator/Sponsor who agrees to supervise and be responsible for the UG while the student is present in the laboratory.
2. The Principal Investigator/Sponsor must provide the UG with hazard specific information and appropriate personal protective equipment and instruct the student in its use and disposal.
3. Each UG must attend Laboratory Safety training provided by EHRS before the laboratory activity begins. If a student is working in a lab where radioactive materials are used, Radiation Safety Training is also required.
4. UGs are not permitted to participate in the following activities in laboratories:
  - i. Any laboratory or facility designated as BSL-3
  - ii. Any laboratory or facility in which Select Agents or Explosives (as defined in OSHA Hazard Communication Standard Appendix B) are used or stored.
5. UGs are permitted to participate in the following activities in laboratories after completing specialized training:
  - i. Work with recombinant DNA
  - ii. Operate farm machinery
  - iii. Work in machine shops
  - iv. Work with radioactive material if over age 18. Undergraduate students under the age of 18 must follow the same restrictions as High School Students for this component.
6. UGs who will work with live animals must be associated with a specific ARIES animal research protocol, have their qualifications or training described and the specific procedures that they will be performing/assisting identified. Prior to working with animals, UGs must complete all necessary IACUC-related training associated with the UGs' role on the protocol.
7. UGs who will work with non-human primates or tissue/body fluids from non-human primate must complete specialized IACUC-related training in addition to standard training for other species.

**C. Non-Affiliates (NA) with undergraduate degrees:** Post graduates including visiting scholars and trainees (not Penn faculty, staff or students)

1. NA must have a Principal Investigator/Sponsor who agrees to supervise the NA while he/she is present in the laboratory.
2. The Principal Investigator/Sponsor must provide the NA with hazard specific information and appropriate personal protective equipment and instruct the NA in its use and disposal.
3. Each NA must affirm that he/she completed a Laboratory Safety course at his/her home institution or complete relevant Laboratory Safety training offered by EHRS before the laboratory activity begins.
4. A NA is permitted to participate in the following activities after completing specialized training:
  - i. A laboratory or facility designated as BSL-3 or ABSL-3
  - ii. A laboratory or facility in which Select Agents (DHHS Security Risk Assessment Approval required) or Explosives are used or stored.
  - iii. Work with recombinant DNA
  - iv. Work with radioactive materials
  - v. Operate farm machinery
  - vi. Work in machine shops.
5. NAs who will work with live animals must be associated with a specific ARIES animal research protocol, have their qualifications or training described and the specific procedures that they will be performing/assisting identified. Prior to working with animals, NAs must complete all necessary IACUC-related training associated with the NAs' role on the protocol.
6. Work with non-human primates or tissues/body fluids from non-human primates requires specialized IACUC-related training in addition to standard training for other species.

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