



Personnel Definitions for Authorizations and Permits

When you start an application in APPS, you will be assigned all of the following roles: Applicant/Permit Holder, Principal Investigator, and Primary Contact. While the application is in draft mode, you can edit and change who is assigned to these roles from the “Project Contacts” page of the application. APPS will send automatic email notices to the Primary Contact and Principal Investigator. This could be two different people or just one person. Definitions of the types of personnel used in APPS authorizations and permits are below.

Applicant/Permit Holder – The person, institution, or agency that is ultimately responsible for all activities of any individual who is operating under the authority of the permit/authorization. Where the Permit Holder is an institution or agency, the **Responsible Party** is the official who has the legal authority to bind the organization (see definition below).

Note: The Applicant becomes the Permit Holder once a permit/authorization is issued. There can be only one Applicant/Permit Holder. **Permits/authorizations are not transferable from one Permit Holder to another and the Applicant/Permit Holder cannot be changed.** For this reason we recommend making the institution or agency the Permit Holder if you need to accommodate the potential for staff turnover. One exception is with 4(d) rules, where the agency issuing the authorization can approve a change in Applicant/Permit Holder.

In many cases, the Applicant/Permit Holder may be the same as the Principal Investigator (PI) and/or Primary Contact. All requests related to the permit/authorization must be submitted via APPS or email by the Permit Holder, Responsible Party, Principal Investigator, or Primary Contact.

Responsible Party – This role is used if the **Applicant/Permit Holder** is designated as an agency or organization. The Responsible Party is an official who has the legal

authority to bind the organization, institution, or agency that is ultimately responsible for all activities of any individual who is operating under the authority of the permit/authorization.

Note: Where an applicant for a permit/authorization is an organization, institution, or agency rather than an individual, the application and permit/authorization must be signed by the Responsible Party. An example is that the Responsible Party for a National Marine Fisheries Service (NMFS) Science Center is the Center Director. The Responsible Party can change with approval from the agency issuing the permit/authorization.

Principal Investigator (PI) - The individual primarily responsible for the take, import, export, and any related activities conducted under a permit/authorization. There can only be one PI on a permit/authorization. The PI:

- Must have qualifications, knowledge, and experience relevant to the activities authorized by the permit/authorization
- Must be on site during activities conducted under the permit/authorization unless a Co-Investigator is present to act in place of the PI
- May also be the Applicant/Permit Holder and Primary Contact.

Note: Because the PI supervises the research, NMFS requires that the PI submit a CV, resume, or Qualifications Form (for Endangered Species Act (ESA) Section 10(a)(1)(A) permits and all Marine Mammal Protection Act (MMPA) permits).

Co-investigator (CI) – Individuals who are qualified and authorized to conduct or directly supervise activities conducted under a permit/authorization without the on-site supervision of the PI.

Note: CIs assume the role and responsibility of the PI in the PI's absence. There can be numerous CIs designated under a single permit/authorization. The CI is authorized to work independently in the field or lead a field crew. For example, there could be separate CIs in charge of distinct activities/projects under a permit/authorization, or responsible for distinct geographic areas under a permit/authorization. Because a CI can supervise research, NMFS requires that a CV, resume, or Qualifications Form be provided for each CI (for ESA Section 10(a)(1)(A) permits and all MMPA permits). If a project has multiple principals, one person must be assigned the PI role and the others assigned CI roles.

Primary Contact – The person primarily responsible for correspondence during the permit/authorization review process and after a permit/authorization is issued. Typically this person administers the permit/authorization, requests amendments/modifications (e.g., personnel changes, filming requests), and submits reports. The Primary Contact may also serve other roles on the permit/authorization (e.g., Applicant/Permit Holder, PI, CI).

The following personnel roles only apply to MMPA permits and ESA permits that are NOT for Pacific fish:

UAS Pilots are persons who have their FAA-certification to fly unmanned aircraft systems and have experience piloting UAS. You should designate someone as a UAS Pilot if they are tasked with only that role and do not have marine mammal experience. If the PI or a CI is certified to be a UAS Pilot, you do not need to select this role. See the applicable application instructions for more details.

Research Assistants (RAs) are individuals who work under the direct and on-site supervision of the PI or a CI. RAs cannot conduct permitted activities in the absence of the PI or a CI. RAs do not need to be named in the application or permit.

Authorized Recipients (ARs) are persons or institutions authorized to receive samples for analysis or curation related to the objectives of your permit as discussed in the Disposition of Tissues section. Permit holders may designate ARs at their discretion with a letter. ARs do not need to be identified in the application or permit.

Veterinarian – A licensed veterinarian who will be present to perform or oversee veterinary or research procedures during permitted activities.

Note: NMFS does not always require a veterinarian to be listed on a permit, but some activities may require the presence of a vet or identification of a vet available for emergencies.