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Permit Eligibility for Graduate Students and Post-doctoral Workers

Last Modified:

Under '7CFR330.204' there are criteria that a graduate student/post doc generally cannot meet, and under those circumstances, a permit should not be issued. Applications are considered on their merits, so a total ban on issuing permits to graduate students/post-doctoral (post doc) workers is not justified. The following guidance should be considered when deciding whether or not a permit should be issued to a graduate student/post-doc:

7CFR330.204(a)(1) requires acceptable safeguards to be arranged, and if an applicant cannot do so, APHIS can deny the permit application. This means applicants must be in a position to control the containment capabilities associated with use of regulated organisms or soil. APHIS cannot reasonably expect a person who does not control the facilities to arrange for acceptable safeguards. If the graduate student/post doc does not control the environment where the regulated organisms will be used, then the application should be denied, and a responsible person such as the major professor or principal investigator who controls the lab should be invited to apply.

A permit may be issued to a graduate student or post doc who is a U.S. resident if the plant health risk associated with the regulated soil or organisms is low, and an APHIS-inspected containment facility is not required. This permit may be issued to the graduate student or post doc for the duration of his/her appointment if known, or for the full three years with the understanding that the permit holder must cancel

their permit upon departure. If he or she wants to move the permitted regulated organisms/soil to another location, they must contact the permit unit per the conditions in their permit.

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