

CONGRUENCY REQUIREMENTS FOR VERTEBRATE ANIMAL ACTIVITIES FUNDED BY PHS OR NSF

As a component of the Just-In-Time (JIT) award procedures, the institution is required to certify the date the IACUC approved the vertebrate animal activities described in a funding application. NIH further stipulates that *“It is an institutional responsibility to ensure that the research described in the application is congruent with any corresponding protocols approved by the IACUC.”* This requirement was extended to include NSF awards with the establishment of a Memorandum of Understanding between NSF and NIH, OLAW in 2015.

This requirement places some demands upon you as the PI that must be fulfilled for the University to accept NIH and NSF awards.

REVIEW PROCEDURES

Upon receiving JIT requests sent by the Grants Management Specialist (for NIH supported activities) or award notification (for NSF supported activities), OSPA will email the PI alerting him/her of the need for further documentation and for a verification of IACUC approval of proposed vertebrate animal activities. The email will contain a copy of the grant application and will be copied to the department administrator, the GPS/CGO, and the Office of the Attending Veterinarian (OAV). If the PI has previously provided an IACUC approval to OSPA, this will also be attached to the e-mail.

Upon receiving the notification from OSPA, the OAV will review the funding application to confirm that all vertebrate animal activities described in the application have been reviewed and approved by the IACUC. This review process generally requires 3-5 days for completion.

REVIEW OUTCOMES

If all of the vertebrate animal activities have been previously reviewed/approved by the IACUC, no further action is required from the PI. In this case, the OAV will issue to OSPA and to the PI a letter of verification of IACUC approval of listed vertebrate animal activities.

If the grant contains activities not approved by the IACUC, the letter issued to OSPA and the PI will list which activities have not been reviewed/approved by the IACUC. In this case a protocol amendment (or a new protocol) to include the missing animal activities (or other items) described in the grant will be required. Other requirements depending on your specific circumstances may apply. Once any missing activities have been properly reviewed/approved by the IACUC, the letter to OSPA and the PI will be issued verifying approval.

INVESTIGATOR RESPONSIBILITIES

It is the responsibility of the PI to obtain IACUC approval of all vertebrate animal activities proposed in the funding application. The University cannot accept the award until the requirements of the funding agency have been fulfilled.

When you receive an automated JIT notice for an NIH application that received a score with a high probability of being funded, ensure that all of the vertebrate animal activities in the funding application have been approved by the IACUC. The period of time between receipt of the

critique and priority score until the award of funding provides you the opportunity to address, through either a protocol amendment or submission of a new protocol, any vertebrate animal activities in the funding application not previously approved by the IACUC. Securing IACUC approval for listed vertebrate activities at the time of the award notification may delay acceptance of the award by the University. Ensuring that all vertebrate animal activities are IACUC approved prior to the award date will result in an initial verification letter and prevent any delays in award acceptance.

If you receive a notification from the OAV indicating a lack of IACUC approval for all vertebrate animal activities listed in the funding application:

1. Submit an amendment or a new protocol addressing the unapproved activities to the IACUC for approval. IACUC approval of amendments or new protocols requires a minimum of 5 business days following submission so time is critical.
2. Please do not contact OSPA and request an exception to the requirement. This is the funding agency's requirement, not OSPA's. OSPA will not submit JIT without a letter of congruence from OAV. Additionally, OSPA will not, except in exceptional circumstances, establish an account in E status pending IACUC congruence. Account establishment will be held until the congruency is verified from OAV.

Once all of the vertebrate animal activities listed in the funding application are approved by the IACUC, the OAV will promptly issue the letter to the PI and OSPA verifying IACUC approval of all activities and fulfilling the funding agency's requirement. OSPA requires a copy of both the IACUC approval email (listing the IACUC approval number and date) as well as the letter of congruency from OAV, for their files. Please ensure that OSPA has the most recent and up-to-date copy of the approval after any amendments are approved.