IACUC REVIEW OF PHS GRANT PROPOSALS INVOLVING THE USE OF ANIMALS

SCOPE:

The Office of Laboratory Animal Welfare (OLAW) administers the Public Health Service (PHS) Policy on Humane Care and Use of Laboratory Animals (PHS Policy).\(^1\) PHS Policy states that “PHS awarding units may not make an award for an activity involving animals unless ... the awardee institution has provided verification of approval by the IACUC of those components of the application or proposal related to the care and use of animals.”

POLICY:

As part of Just-in-Time (JIT) procedures for grants that include the use of vertebrate animals, the IACUC must compare the grant application with the principal investigator’s approved protocols, and assure that all proposed procedures involving animals contained in the grant application (in all years) have IACUC approval. On March 30, 2012, NIH announced that applicants must submit required JIT information using the JIT feature of the eRA Commons at least 60 days before the applicant’s proposed project period start date. Consequently, it is imperative that all investigators submit protocols to the IACUC related to their pending grant as soon as they receive a grant score that may fall in the fundable range, and in addition complete the IACUC’s grant review process to permit the timely submission of JIT materials. Failure to submit complete JIT verifications may delay release of funding from the agency, and the Office of Research will not activate accounts for spending from PHS grants until the IACUC office verifies that approval has been given for all animal activities identified in the grant application.

PROCEDURES:

1. If a PHS grant application involves the use of vertebrate animals, this must be indicated on the cover page of the application, as well as University of Pittsburgh Application Form 0136. The Office of Research staff will review the application to verify if any of the proposed activities involve the use of animals. If animal activities are identified, the principal investigator will be required to correct the cover page and comply with this policy.

2. PHS grant applications (new and competing renewals) involving the use of vertebrate animals for teaching and/or research shall be specifically designated as involving animals in the grant application database of the Office of Research.

3. The Office of Research grant application database shall automatically generate Notification of Required IACUC Grant Application Review letters for dissemination to involved principal investigators at 4 months, and repeated at 5 months, following the submission of PHS grant applications (new and competing renewal) involving the use of animals for teaching and/or research.

4. Upon notification of potential funding of a PHS grant proposal (new or competing renewal) involving the use of animals for teaching and/or research, the respective principal investigator shall complete an IACUC Grant Application Review Form (see http://www.iacuc.pitt.edu/node/242) and submit it electronically to the University of Pittsburgh IACUC Office. This submission shall include a copy of pertinent sections of the final PHS grant proposal and, when applicable, any corresponding (i.e., corresponding to the animal use activities proposed in the PHS grant) IACUC protocol(s) not previously reviewed and approved by the IACUC.

5. An IACUC committee or office staff member designated by the IACUC Chair shall review the PHS grant proposal (new or competing renewal) and corresponding IACUC protocol(s) to verify that all animal use activities described in the PHS grant proposal have been described in, and are consistent with, one or more IACUC-approved protocols.

\(^1\)Public Health Service. Policy on Humane Care and Use of Laboratory Animals, Section V.B. (US Department of Health and Human Services, Washington, DC, 1986).
• The designated IACUC member shall report to the IACUC Office any discrepancies between animal use activities described in the proposed PHS grant proposal and the corresponding IACUC-approved protocols. The IACUC Office shall subsequently notify the respective principal investigator of these discrepancies and appropriate corrective actions that must be taken by the investigator (e.g., the formal submission of modifications to an existing IACUC-approved protocol or the submission of a new IACUC protocol). The IACUC Office shall provide a copy of the identified discrepancies to the IACUC Chair.

• An IACUC Office staff member shall generate a letter upon verification that all animal use activities described in the PHS grant proposal have been described in, and are consistent with, one or more IACUC-approved protocols. This letter is sent to both the principal investigator and the Office of Research.

6. Upon completion of the grant review process, an IACUC Office staff member shall access the corresponding PHS grant information in the grant application database of the Office of Research and designate that the IACUC has approved all activities involving animals that appear in this grant proposal.

7. The Office of Research shall certify JIT information for new or competing PHS grant proposals involving the use of animals only upon review of its grant application database and verification that the IACUC Office has designated that all animal activities described in the PHS grant have been approved by the IACUC.

8. Any problems or concerns related to this policy and/or related procedures shall be brought to the attention of the IACUC Chair.

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The University of Pittsburgh IACUC and Office of Research have reviewed and approved these policies and procedures as attested by the signatures below.

_________________________________ Date
IACUC Chair

_________________________________ Date
Director, IACUC Office

_________________________________ Date
Director, Office of Research

_________________________________ Date
Institutional Official