



## Policy: IACUC Congruency Review of Grants and Contracts Involving the Use of Live Vertebrate Animals

EFFECTIVE ISSUE DATE: 7/13/2021

REVISION DATE(s):

### 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)*<sup>1</sup>. *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.” This policy also applies to American Heart Association (AHA) and National Science Foundation (NSF) awards, as well as contracts awarded through PHS.

### POLICY:

As part of Just-in-Time (JIT) procedures for applicable awards that include the use of live vertebrate animals, the IACUC must compare the award application or the contract with the principal investigator’s approved protocols and assure that all proposed procedures involving live vertebrate animals contained in the award or contract 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 award as soon as they receive a score that may fall in the fundable range, and in addition complete the IACUC’s Congruency 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 Sponsored Programs (OSP) will not activate accounts for spending from NIH, AHA, or NSF awards until the IACUC office verifies that approval has been given for all live vertebrate animal activities identified in the award application. This also applies to contracts awarded through PHS.

### PROCEDURES:

1. If an award/contract application describes the use of live vertebrate animals, OSP staff will review the application to verify if live animal activities are proposed and will ensure compliance with this policy. Grant applications (new and competing renewals) or contracts that involve the use of live vertebrate animals for teaching and/or research will be designated as such in the OSP’s award application database.
2. Upon notification of potential funding (new or competing renewal) by NIH, AHA, or NSF involving the use of live vertebrate animals for teaching and/or research, the respective principal investigator will complete a Congruency Review form and submit it electronically to the IACUC Office. This submission will include a copy of pertinent sections of the final award proposal. Similar requirements apply to awarded contracts.
3. All vertebrate animal work for an award or contract administered by the University of Pittsburgh as the primary recipient of funds must undergo a Congruency Review by the University of Pittsburgh’s IACUC. This includes any sub-contract for animal work performed outside of the University of Pittsburgh. The converse, in which another institution is the primary recipient of a grant or contract, but vertebrate animal work is performed at the University of Pittsburgh as a sub-contract, the work at the University of Pittsburgh will undergo a congruency review at the primary recipient institution.
4. An IACUC member will review the award proposal and corresponding IACUC protocol(s) to verify that all live animal use activities described in the proposal are covered by one or more IACUC-approved protocols. If any discrepancies between animal use activities described in the award proposal or contract and the corresponding IACUC-approved protocols are identified, the principal investigator will be notified so that appropriate actions can be taken (e.g., submitting a protocol

<sup>1</sup>Public Health Service. <https://olaw.nih.gov/policies-laws/phs-policy.htm>

modification request or a new IACUC protocol application).

5. When the IACUC office has determined that the vertebrate animal use activities described in the award proposal or contract are consistent with one or more IACUC-approved protocols, a Congruency Review approval letter will be generated. The letter will be sent to both the principal investigator and the OSP.
6. The OSP will certify JIT information for new or competing award proposals or contracts involving the use of animals.