

University at Buffalo Institutional Animal Care and Use Program Policy on Accepting IACUC Reviews from Other Institutions

Introduction

There are many circumstances that involve partnerships between collaborating institutions or relationships between institutional animal care programs. OLAW (Office of Laboratory Animal Welfare) and USDA-APHIS (U.S. Dept. of Agriculture-Animal and Plant Health Inspection Service) agree that review of a research project or evaluation of a program or facility by more than one recognized IACUC is not a federal requirement.

It is imperative that institutions define their respective responsibilities. PHS Policy requires that all awardees and performance sites hold an approved Animal Welfare Assurance. OLAW negotiates Inter-institutional Agreement Assurances of Compliance when an awardee institution without an animal care and use program or IACUC will rely on the program of an Assured Institution. Assured institutions also have the option to amend their Assurance to cover non-assured performance sites, which effectively subjugates the performance site to the Assured institution and makes the Assured institution responsible for the performance site.

Policy

This policy defines when the University at Buffalo's IACUC will accept another institution's IACUC approval or require submission of a project for review and approval by UB's IACUC.

For work performed at the University of Buffalo (UB) with funding administered through another institution:

The University at Buffalo's IACUC will review and approve all animal care and use activities performed at UB-owned or leased facilities and all activities involving UB-owned animals.

This work must be associated with a University at Buffalo affiliated member who is eligible to serve as Principal Investigator on a UB protocol which describes the work. The protocol and any amendments to the protocol must be submitted for review and approved by the UB's IACUC prior to initiation of work.

All personnel involved in animal work performed at the University at Buffalo must comply with all UB IACUC and UB LAF (Lab Animal Facility) policies and procedures.

For work performed at the University at Buffalo (UB) with funding administered through a subcontract from another institution:

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Animal research conducted at UB that is funded by a subcontract from another institution is handled the same as from any other funding source. It is reviewed, approved, and overseen by UB's IACUC.

There is a unique issue, however, involving a special type of federal funding: the small business set-asides known as SBIR and STTR grants. In these cases, the prime grantee is typically a new, small business that does not have its own PHS Assurance. As part of the terms and conditions of the grant, the prime grantee must subcontract all live-animal research to an assured institution. A special form known as an **Interinstitutional Agreement** is required to be completed by the grantee organization and UB's IACUC Administration Office with signatures from UB's Institutional Official and IACUC Chair and then sent to the Office of Laboratory Animal Welfare at NIH, so that the award can be made under the umbrella of UB's PHS Assurance. For more information about this type of collaboration, please contact the IACUC Administrator.

For work performed at another institution with funding administered through the University at Buffalo:

The University at Buffalo's IACUC will accept another institution's IACUC review and approval of a protocol and any amendments to the protocol **if**:

- 1) The other institution has a current Public Health Service (PHS) Approved Animal Welfare Assurance.
- 2) The other institution holds a current Class R Registration with the USDA-APHIS under the Animal Welfare Act, as a research facility (if USDA-covered species are involved).
- 3) The other institution is currently accredited by the Association for Assessment and Accreditation of Laboratory Animal Care International (AAALAC).

If the above requirements 1-3 are not met, the investigator will be required to submit a protocol to the University at Buffalo's IACUC for review and approval. Note that submitting a protocol for work performed at an institution that does not have its own PHS Animal Welfare Assurance will require that the location(s) be added to the University at Buffalo's PHS Animal Welfare Assurance and that the University's IACUC will inspect, every six months, the performing institution's animal facilities where animals will be housed and/or taken for use during the course of the studies. The site will also be included in UB's AAALAC Program Description and included during triennial AAALAC Site Visits. Personnel involved in animal work must comply with all IACUC and LAF policies and procedures. Final approval for performing such animal work outside of UB's LAF will require approval from UB's Institutional Official and require a MOU between UB and the performance site.

If the above requirements 1-3 are met, the University at Buffalo's IACUC may administratively accept the other institution's approval of a protocol/amendment.

The University at Buffalo's IACUC must have on file a formal written understanding (i.e., a memorandum of understanding or MOU) with the other institution, addressing responsibilities for animal care and use, animal ownership, and IACUC review and oversight.

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The University IACUC office will maintain the following documentation on the protocol:

- 1) A copy of the approved protocol/amendment.
- 2) A copy of the approval letter for the protocol/amendment.
- 3) A copy of the annual protocol renewal approval (if applicable).
- 4) A copy of any funding proposal in support of the work.
- 5) Copies of any reports which include information about significant issues related to the protocol, including any found during semi-annual inspections.
- 6) A copy of the memorandum of understanding between institutions.

Protocols/amendments reviewed and approved by the other institution's IACUC may be subject to grant congruency checks by the University at Buffalo's IACUC.

Protocols/amendments reviewed and approved by the other institution's IACUC do not absolve a Principal Investigator from obtaining University at Buffalo Institutional Biosafety Committee (IBC), Radiation Safety Committee (RSC), or Institutional Review Board (IRB) approval, if required.

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