



Costing for Animals without Active IACUC Approval – Policy & Guidelines

Definitions

Institutional Animal Care and Use Committee (IACUC) – committee responsible for approving all activities involving the use of animals at the University of Iowa

Animal Care and Use Review Form (ACURF) – form that must be completed and approved by IACUC for any activities involving the use of animals at the University of Iowa

Basis for Policy

University policy and federal regulations require that costs for activities with live vertebrate animals will be charged only when an IACUC approved ACURF is in place and valid. On January 26, 2007, the National Institute of Health (NIH) published a notice in the NIH Guide for Grant and Contracts (NIHGPS) entitled “Guidance Addressing the NIH Policy on Allowable Costs for Grant Activities Involving Animals when Terms and Conditions are Not Upheld” (<http://grants.nih.gov/grants/guide/notice-files/NOT-OD-07-044.html>). NIH Policy includes the following points:

- Terms and conditions applicable to all grant awards that involve live, vertebrate animals - including research, research training, experimentation, biological testing, custom antibody preparation, or related purposes – require a valid IACUC approval. IACUC approval must be dated within the last three years in order to be valid. IACUCs are not authorized to administratively extend approval beyond three years.
- The Office of Management and Budget Cost Principles and the NIHGPS do not permit charges to grant awards for the conduct of animal activities during periods of time that the terms and conditions of the NIHGPS are not upheld.
- The conduct of animal activities in the absence of valid IACUC approval of the activity is not allowable. Absence of IACUC approval includes failure to obtain IACUC approval, expiration, or suspension of IACUC approval.
- Institutions are required to report such situations to the Institute/Center (IC) supporting the award. NIH expects grantees to continue to maintain and care for animals during the periods described above. Funding components may allow expenditure of NIH grant funds for maintenance and care of animals on a case-by-case basis.

- These situations constitute serious noncompliance with section IV.F.3. of the PHS Policy (<http://grants.nih.gov/grants/olaw/references/phspol.htm#Reporting%20Requirements>) and as such must be promptly reported to OLAW (Office of Laboratory Animal Welfare) in accord with the PHS Policy.

Policy Statement

Each department is responsible for complying with and enforcing the following policies and procedures.

It is expected that the Principal Investigator (PI) will comply with all IACUC requirements including:

- (1) Compliance issues regarding the approved use of animals;
- (2) Timely submission of new ACURF for review and approval by the IACUC prior to expiration of existing ACURF.

The PI, in the absence of an IACUC approved and valid ACURF, may perform **no** procedures with live vertebrate animals assigned to the invalid ACURF, until a replacement IACUC approved and valid ACURF is in place.

The PI, in the absence of an IACUC approved and valid ACURF, may **not** acquire animal data during this period. Any and all data acquired during this period of time must **not** be utilized in any research records, scientific publication or any other related entity, and all such records must be permanently destroyed. Use of such data will be considered scientific misconduct and reported to the Office of the Vice President for Research.

The PI may charge **no** costs to a sponsored account for activities with live vertebrate animals in the absence of an IACUC approved, valid ACURF. This includes costs to maintain and care for animals. The PI's primary department is responsible for costs to maintain and care for animals during periods of no valid ACURF (expiration, suspension, or failure to obtain). These costs must be covered from a non-sponsored project account. The department will be asked to provide a valid, non-sponsored project account to Grant Accounting; if an account is not provided, the department's general fund account will be charged for these costs.

Once the absence of the IACUC approval is resolved, the costs incurred for activities conducted during the time ACURF was not approved cannot be back charged to a sponsored project account and must be covered by non-sponsored departmental funds.

The University of Iowa, through the Division of Sponsored Programs, as required, will report these situations to the Institute/Center supporting the award.

This situation will also be promptly reported to the Office of Laboratory Animal Welfare (OLAW) by the Institutional Official.