

GUIDANCE FOR UVA RESEARCHERS RECEIVING PHS FUNDING AND SUBCONTRACTING ANIMAL WORK TO A FOREIGN INSTITUTION

NIH/OLAW POLICY

“When the grantee is a domestic institution (i.e., domestic grant with a foreign component), PHS animal welfare requirements are applicable. Accordingly, the grantee remains responsible for animal activity conducted at a foreign site and must provide verification of IACUC approval. That approval certifies that the activity, as conducted at the foreign performance site, is acceptable to the grantee. The grantee IACUC may accept, as its own, the approval of a foreign entity's IACUC; however, the grantee IACUC remains responsible for the review. Additionally, the foreign entity must complete the “Statement of Compliance with Standards for Humane Care and Use of Laboratory Animals by Foreign Institutions” available from OLAW. This document certifies that the institution will comply with the applicable laws, regulations, and policies of the jurisdiction in which the research will be conducted, and that the institution will be guided by the [International Guiding Principles for Biomedical Research Involving Animals.](#)”

SOP FOR IMPLEMENTATION AT UVA

1. The grantee investigator or Principal Investigator (PI) at UVA must submit to the ACUC Office the following documents:
 - a. A copy of the foreign institution’s IACUC approval and renewal as required for the duration of the contract. If this approval is not in English, an English translation must be provided.
 - b. A copy of the foreign PI's approved animal use protocol, and any updates or modifications during the duration of the contract. If this protocol is not in English, an English translation must be provided.
 - c. Evidence of current OLAW Assurance of Compliance for the foreign institution and the Assurance number. (Approved Assurances are listed on the OLAW website. Foreign: <http://grants.nih.gov/grants/olaw/assurance/500index.htm>; Domestic: <http://grants.nih.gov/grants/olaw/assurance/300index.htm> .) If the foreign institution does not have an Assurance listed with OLAW, it must negotiate one with OLAW by completing the "Statement of Compliance with Standards for Humane Care and Use of Laboratory Animals by Foreign Institutions" (available from OLAW) and submitting it to them for review and approval.
 - d. If there is also a corresponding animal use protocol at UVA, the grantee PI must reference the ACUC protocol number and last approval date. (Not always applicable)

- e. A cover letter from the PI with an explanation of why the work is being done outside the University of Virginia.
2. The ACUC will review the documents submitted by the grantee PI and verify that the animal work proposed for the subcontracted site is in accordance with the *Guide for the Care and Use of Laboratory Animals*.
3. Once all documents have been verified, the ACUC office will provide the grantee PI with a document certifying review and acceptance of the subcontracted animal work. (Certification of Review of Animal Research Subcontracted to Foreign Institutions)
4. The grantee PI will submit the ACUC certification document to the Office of Sponsored Programs in accordance with UVA Procedure: 8-18, "External Subcontracting Under Sponsored Awards and Contracts",
<http://www.virginia.edu/finance/polproc/proc/8-18.html>.

CONTACT INFORMATION

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