Institutional Animal Care & Use Program - UTEP	
Title: Protocol to Grant Congruency	
Policy#: 031	**Date in Effect**: 27 January 2025
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In Effect ☒ **Rescinded** ☐	**Date Rescinded**:

A) RESPONSIBILITIES

It is the responsibility of all personnel using animals at The University of Texas at El Paso (UTEP) to abide by this policy. If an exception is needed by an employee or visiting scholar it is the responsibility of the Institutional Animal Care and Use Committee (IACUC) to review for approval such requests for an exception to this policy.

B) BACKGROUND

The Office of Laboratory Animal Welfare (OLAW) administers the Public Health Service (PHS) Policy on Humane Care and Use of Laboratory Animals (PHS Policy). 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. The Department of Health and Human Services (HHS), primarily through the Public Health Service (PHS) and the National Institutes of Health (NIH) is the principal funding source for research using live vertebrate animals at The University of Texas at El Paso (UTEP). The PHS and NIH Grants Policy requires institutions to verify, before award, that all proposed animal work has been reviewed and approved by the IACUC. The NIH Grants Policy Statement (10/12), Terms and Conditions of NIH Grants Award (4.1.1.2 Verification of IACUC Approval) states "It is an institutional responsibility to ensure that the research described in the application is congruent with any corresponding protocols approved by the IACUC."

C) PROCEDURE

As outlined above, grant congruency verification to ensure IACUC approval is required ***prior to final award*** for all PHS grants; to maintain the highest standard of

compliance and program consistency, UTEP applies this requirement to all grant proposals. Funding proposals using live vertebrate animals must be reviewed by the Institutional Animal Care and Use Program (IACUP) to ensure that all the work proposed has received IACUP approval before the award can be processed.
Upon notification of awarded funding (new or competing renewal) involving the use of live vertebrate animals for teaching and/or research, the IACUP Office will perform a congruency review. The IACUP Office 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 modification request or a new IACUC protocol application).

When the IACUP 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, notification will be made to the Office of Sponsored Projects (OSP).

If work with live animals is being done externally by collaborators through a sub-award or a sub-contract, and UTEP is the awardee institution, the terms and conditions of the grant flow through to the sub-awardee. UTEP is held accountable to ensure that the work conducted by the sub-awardee meets all applicable regulations and guidelines. Therefore, such projects are subject to review by UTEP IACUC. The extent of the review will depend upon the accreditation and the Assurance status of the sub-awardee institution/agency. If the sub-awardee has a current PHS Assurance, is AAALAC accredited, and the work proposed has been approved by the sub-awardee's IACUC, UTEP may elect not to perform a duplicate IACUC review. Instead, UTEP may elect to enter into an administrative Memorandum of Understanding (MOU) with the sub-awardee institution. If the sub-awardee has a current PHS Assurance, but is not AAALAC accredited, the UTEP IACUC will decide on a case-by-case basis whether it will perform a full review of the protocol or will choose to rely on the other institution's IACUC to oversee animal care and use on the protocol.

D) REFERENCES

1) PHS Policy on Humane Care and Use of Laboratory Animals Frequency Asked Questions
2) PHS Policy on Humane Care and Use of Laboratory Animals
3) OLAW Online Seminar “Grants Policy and Congruence” by Dr. Patricia Brown, Director OLAW

Review History	
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