I. PERFORMANCE STANDARD

Northwestern University (NU) assures all research is conducted in an appropriate and legal manner when collaborating with other institutions.

II. BACKGROUND

PHS Policy assigns responsibility to the prime awardee/grantee for the conduct of PHS funded research and for ensuring the information the IACUC approves is consistent with the grant. The NIH Office of Laboratory Animal Welfare (OLAW) has clarified the roles that NU may assume when participating with other institutions in PHS-assured collaborative research. While Northwestern University believes collaborative activities are beneficial to successful research endeavors, they have the potential to create ambiguities and in accordance with the Guide, should have a formal written understanding to outline animal care and use responsibilities, animal ownership, and IACUC review and oversight.

III. POLICY

This Policy provides guidance for situations where NU researchers desire to have collaborative activity involving animals performed at institutions other than NU. To outline each institution’s responsibilities for collaborations, an IACUC Agreement will be initiated. Review of the protocol by multiple IACUCs is not required; however, the NU IACUC will review collaborations occurring at foreign sites and protocols involving USDA covered species to ensure the work is appropriate. Regardless of which IACUC reviews the protocol, documentation of the protocol review must be maintained by both collaborating IACUCs.

The IACUC Office shall serve as the coordinating unit for the NU IACUC to assure all necessary requirements have been met prior to executing an IACUC Agreement. Documents that must be submitted to the IACUC Office, as applicable include:

1. Complete copy of the grant (if federally funded)
2. Approved animal protocol and approval letter from the collaborating (subawardee) institution’s IACUC or ethics committee.
A. Options for collaborative work when PHS funds are involved, and:

1. **NU is the primary grantee of PHS funds which shall be used at a collaborating (subawardee) PHS-assured Institution:** The IACUC Office will confirm that the work is approved by the collaborating institution’s IACUC and complete a congruency review. An IACUC Agreement between the two institutions shall be established.

2. **NU is the primary grantee of PHS funds that shall be used at a non-assured collaborating (subawardee) institution:** NU will not generally extend its PHS Assurance to non-assured institutions, except in extraordinary circumstances as determined by the Institutional Official. The collaborating institution shall contact the NIH requesting to become an assured institution. NU IACUC shall review/approve the collaborator’s protocol. An IACUC Agreement between the two institutions shall be established.

3. **NU is the collaborating institution using PHS funds for which the other institution is the primary grantee:** NU shall review/approve the protocol for the work being performed at NU. NU shall provide the primary grantee any information requested to fulfill the obligations of the primary grantee. The primary grantee is responsible for confirming congruency and initiating an IACUC Agreement.

C. Options for collaborative work when NU is the primary grantee of non-PHS funds which shall be used at the other institution: The IACUC Office will confirm that the work is approved by the collaborating institution’s IACUC. An IACUC Agreement between the two institutions shall be established.

IV. References

4. NIH Subawards (Consortium Agreements) for Grant SOP: [https://www.niaid.nih.gov/research/grants-subawards-consortium-agreements](https://www.niaid.nih.gov/research/grants-subawards-consortium-agreements)
5. AAALACi, FAQ B.: [https://www.aaalac.org/accreditation/FAQ_Landing.cfm#A1](https://www.aaalac.org/accreditation/FAQ_Landing.cfm#A1)