



**FEDERAL DEMONSTRATION PARTNERSHIP**  
Redefining the Government & University Research Partnership

*Workgroup session:  
IACUC and MOUs*

Presented by  
FDP IACUC and Subawards Subcommittees



# Speakers

(in alphabetical order)

Amanda Humphrey, Northeastern University  
FDP Subawards Subcommittee Co-Chair

Stephanie Scott, Columbia University  
FDP Subawards Subcommittee Co-Chair

Ara Tahmassian, Harvard University  
FDP IACUC Subcommittee Co-Chair

Axel Wolff, OLAW  
FDP IACUC Subcommittee Co-Chair, Federal Partner



# Agenda

- Quick recap where we left off
- Definitions
- Guest Speaker:
  - Alice Huang, Ph.D.; Dept of Veteran Affairs
  - Staff Scientist and Deputy for IACUC Guidance
- Discussion and Q&A
- Talk next steps/action items



# Remember the Ultimate Questions

- How do you ensure that roles and responsibilities are defined when more than one institution is conducting work with vertebrate animals funded by the same grant?
  - Same question applies if there is no grant.
- What type of agreement should be used between collaborating institutions that will ensure the appropriate individuals are aware of each of their roles?
- What's the least burdensome way to do this?



# Guide for the Care and Use of Laboratory Animals, 8th Edition

It contains guidance on inter-institutional collaborations, specifically,

- *“Interinstitutional collaboration has the potential to create ambiguities about responsibility for animal care and use. In cases of such collaboration involving animal use (beyond animal transport), the participating institutions should have a formal written understanding (e.g., a contract, memorandum of understanding, or agreement) that addresses the responsibility for offsite animal care and use, animal ownership, and IACUC review and oversight (AAALAC 2003). In addition, IACUCs from the participating institutions may choose to review protocols for the work being conducted.” (Page 15, 2011)*



# Definitions

- Memorandum of Understanding (MOU):
  - The MOU is to be used in circumstances that involve partnerships between collaborating institutions involving animal activity.
- Inter-Institutional Assurance (IIA)
  - The IIA is required when the awardee institution does not have its own animal program and will conduct the animal activity at a secondary Assured institution(s) named as the performance site.
- Subaward
  - Used to document the Terms and Conditions (T&C) of the collaboration between the parties, currently T&Cs do offer choices to collect the IACUC approval letter



# Responses from Webinar

Does your institution issue MOUs when multiple institutions are working with vertebrate animals on the same research project?

## **262 Responses**

89 or 34% = Always, even if there is a subaward

25 or 10% = Only if there is not a subaward

62 or 24% = We do not issue MOUs, we consider the OLAW assurance of the subrecipient/collaborator to be sufficient

86 or 33% = I don't know

*\*rounded percentages for simplicity, thus it equals 101%*



# Responses from Webinar

When you are a subrecipient on a NIH funded project where do you report any animal welfare issues?

## **282 Responses**

26 or 9% = Directly to OLAW, no notification to the PTE

123 or 44% = Directly to OLAW, with notification to the PTE

(either as a cc: or separately)

35 or 12% = To the PTE with a request for them to pass to OLAW

98 or 35% = Not sure what our process is.

*\*Somehow, the rounding worked out here.*



# Responses from Webinar

How is operational alignment between your institutions' IACUC office (when issuing MOUs) and the office that issues subawards?

## **271 Responses**

50 or 18% = The MOU process and subaward process are closely aligned (subaward not issued unless MOU issued first)

113 or 42% = The MOU process and subaward process are mutually exclusive (not tied together at all)

26 or 10% = MOU language is included in the subawards, one office responsible for both parts.

82 or 30% = I don't know.

*\*Again, the rounding worked out here, hooray!*



# VA MOU Template Tool

Alice Huang, Ph.D.; Dept of Veteran Affairs  
Staff Scientist and Deputy for IACUC Guidance

Go to “Drafting an MOU” template tool:

[https://www.research.va.gov/programs/animal\\_research/guidance.cfm](https://www.research.va.gov/programs/animal_research/guidance.cfm)

	primates in addition to canines)		
AR2016-001	<a href="#">ORD-ORO Joint Guidance on Semi-annual Reviews of the ACUP</a> (guidance) 		September 23, 2016
AR2015-005	<a href="#">Drafting an MOU</a>  (template tool)		August 13, 2015 (original), March 28, 2018 (updated), May 29, 2018 (typos corrected); January 03, 2020 (revised)
AR2015-004	<a href="#">Criteria for NSM and NAM</a>  (guidance) <a href="#">Decision Flowcharts</a> 		August 13, 2015 (written guidance) December 8, 2016 (flowcharts)



- Q&A
- Next Steps