SUBJECT: Animal Research Being Done at another PHS Assured Site

There are many circumstances that involve partnerships between collaborating institutions or relationships between institutional animal care programs. OLAW and APHIS agree that review of a research project or evaluation of a program or facility by more than one recognized IACUC is not a federal requirement.

It is imperative that institutions define their respective responsibilities. PHS policy requires that all awardees and performance sites hold an approved Animal Welfare Assurance. OLAW negotiates interinstitutional Agreement Assurance of Compliance when an awardee institution without an animal care and use program or IACU will rely on the program of an Assured institution. Assured institutions also have the option to amend their Assurance to cover nonassured performance sites, which effectively subjugates the performance site to the Assured institution and makes the Assured institution responsible for the performance site.

If both institutions have full PHS Assurances, they may exercise discretion in determining which IACUC reviews research protocols under which institutional program the research will be performed. It is recommended that if an IACUC defers protocol review to another IACUC, then documentation of the review should be maintained by both committees.