

Sponsor Notification of Suspended Animal Protocols

Background: Suspensions of animal protocols are rare. They may be a suspension of an activity or of the entire protocol. If someone loses "privileges", it may be possible to work on portions of the project not involving the suspended activity. It would be extremely rare that an entire protocol would need to be suspended and that Research and Sponsored Programs (RSP) would have to block all expenditure activity on a project.

--The Chief Veterinarian reports findings on sponsored projects (federal and non-federal) to the federal Office of Laboratory Animal Welfare (OLAW). The majority of findings would be awards funded by the National Institute of Health (NIH), the largest provider of research funds both nationally and at the UW. The notification to OLAW is via a letter prepared by the Chief Veterinarian and signed by the Department Chair. This letter contains a statement that RSP will be notifying the grant sponsor of the situation.

--The Chief Veterinarian will notify designated RSP staff (currently the Assistant Director of Post-Award and the Managing Officer, NIH Post-Award) of the suspension. The Chief Vet also notifies the Associate Dean for Research Policy. The grant number(s) from the protocol will be referenced in the notification. RSP will verify that grant number is current.

--When RSP receives a notification from the Research Animal Resource Center (RARC), the Post-Award Team Leader(s) handling the awards covered by the protocol should discuss specifics further with the Chief Veterinarian at RARC.

--RSP will notify the sponsor via letter that there has been a suspension and that it is being reviewed by the appropriate offices of the University. RSP will copy the Chief Veterinarian on the email sending this letter to the sponsor.

--Notification needs to happen quickly. The Chief Veterinarian is required to notify OLAW "promptly, i.e., without delay". The expectation is that the sponsor will receive notification shortly thereafter.

--In most cases, spending will be able to continue on some activities. In rare cases, RSP will need to block expenditure activity. RSP shall notify the campus departments of limitations on spending and any changes to the project status (i.e. blocks on expenditures). Blocking expenditure activity in the Shared Financial System (SFS) does not allow any expenses to post to a project; this action should not be taken unless an entire protocol has been suspended. For partial loss of privileges, it is the responsibility of the campus department to ensure that expenses related to the suspended activity are not charged to the sponsored project.

--The Chief Veterinarian will keep RSP apprised of the status of the reviews and any decisions and remedies. Generally, these situations are resolved in a short amount of time. If there are major issues, it will take longer--in such cases, there are usually long investigations and discussions.

--The Associate Director at RARC will be the Chief Veterinarian's back-up for this process.

Federal Policy References:

NIH OLAW Notification: <http://grants.nih.gov/grants/guide/notice-files/NOT-OD-05-034.html>

NIH Allowable Costs involving Animals when Terms and Conditions Not Upheld: <http://grants.nih.gov/grants/guide/notice-files/NOT-OD-07-044.html>

NIH Guidance on Confirming Appropriate Charges to NIH Awards during Periods of Noncompliance for Activities Involving Animals: <http://grants.nih.gov/grants/guide/notice-files/NOT-OD-10-081.html>