ARC Grant Congruence FAQs

1. Why does the ARC demand that I submit an amendment describing animal work on my pending grant before I receive funding?
Because the NIH (and increasingly other granting agencies) REQUIRE that the IACUC (the ARC at UCLA) issue an assurance that experiments involving animals on a grant application have been reviewed and approved PRIOR to release of funds.

2. When should I submit an amendment to list a grant on my ARC protocol as a source of funding?
For NIH grants - when you receive a priority score that indicates a reasonable chance of funding. Note that a Just-In-Time (JIT) link for your application on ERA commons will appear after review is complete if you are given a priority score of 40 or better. However, as you know, for most institutes the pay line is substantially lower, so use your own judgment. That said, if you wait for a formal JIT email from your funding institute before submitting an amendment, you (and the ARC!) will be scrambling to meet the deadlines imposed by the agency (see #11 below).
For other granting agencies - Sponsors greatly differ in their deadlines for requiring ARC approval: some request the information 2 weeks ahead of funding, some just a few days. As such, please communicate with the ARC staff as soon as you know what your sponsor's requirements are so we can help you meet them.

3. Should I list a grant that is in the proposal stage, but hasn't been submitted to a Sponsor yet?
No

4. How about a grant that I submitted, but it hasn't gone to study section yet?
Again, no

5. OK, fine. I got a priority score and there's a good chance this will be funded. Should I add the grant now?
Yes, please submit an amendment to the ARC protocol under which the animal work in the grant will be performed. If the animal work will be split across multiple ARC protocols, please update the "Inconsistencies" text to identify which activities/aims will be done under a different protocol and identify that protocol number.

6. What if some of the animal work is done off-site?
If UCLA is the prime awardee, and some of the animal work is subbed out to another PI at another institution, you need to list the activities/aims performed off-site, identify the location and PI, and provide a copy of the protocol and approval notice that covers the off-site work.

7. Do you need anything else for my amendment?
Yes, please provide a complete copy of the grant proposal, including title page, performance site(s), research design/methods, and vertebrate animals section.

8. My grant includes confidential information; I'd rather not provide a full copy.
The ARC and support staff adhere to the rules of confidentiality that surround research at UCLA. We will not distribute your grant beyond the individual(s) immediately involved in the review.

9. Anything else?
Yes, please make sure that all of the animal work detailed in the grant is described in your ARC protocol and/or the other protocols that you reference in the "Inconsistencies" text. This includes description of, and rationale for, all the experiments, not simply the procedures used.

10. Are you kidding? That's a lot of work and I don't know for sure that this is going to be funded.
The purpose of the ARC congruence review is to verify that the animal work described in the grant proposal has been reviewed and approved by the ARC. If the animal work is not in an approved protocol, the ARC cannot provide this verification; to do so would be disingenuous.
Please note that any new animal activities added to the protocol as part of the grant will be subject to the usual ARC review processes. As such, please allow yourself sufficient time in advance of your sponsor's deadlines to secure ARC approval for the amendment.

11. How about if I wait until I get a JIT email notice from the funding institute and then add everything?
You are welcome to wait, if you so choose; however, please understand that the ARC processes well over 150 new, renewal, amendment, and continuation applications each month. We will make every effort to move your review through the queue in a timely fashion, but we cannot guarantee a specific turn-around time. We instead encourage you to add the grant and amend the proposed animal work to your ARC protocol in advance of the JIT email if you think there is a reasonable chance of funding.

12. OK, fine. So what happens when I submit my funding amendment? What are you actually looking at?
The reviewer assigned to your funding amendment will read the research design/methods and vertebrate animals sections of your grant proposal, then check the ARC protocol to ensure that there is close congruence. The reviewers are unconcerned with work in the ARC protocol that is not in your grant; however, if there is animal work in your grant, this must be addressed by the ARC protocol.

13. Some of the animal work proposed in my grant will not be conducted for several years. It doesn't make sense for me to add a full description of these experiments to my ARC protocol now when I'll have to do a renewal before I even get to that stage in the grant. Never mind that earlier work performed in the grant may change the direction we go in later years.
We understand and, fortunately, NIH does too. Rather than include full descriptions of animal experiments that are not planned to be conducted for several years, you need only provide 1-2 sentences in the ARC protocol summarizing the experiments. Your ARC approval will include a statement that the animal work in your grant that is planned for later years will not be conducted until ARC approval is obtained. OCGA defines this type of planned postponement of animal experiments as "delayed onset."

14. I find this whole thing irritating. No one does what is in their grant and everyone knows that.
We understand that this is an inconvenience, but NIH expects there to be institutional assurance of approval for the proposed animal work. Other sponsors have come to expect this assurance as well.

15. My sponsor is demanding approval today or I will lose my grant, but the ARC is requiring that I add those animal activities in the grant that aren't in my protocol. Help!
It's important for you to communicate any urgent deadlines to the ARC support staff so that we can prioritize your funding review appropriately. In critical cases, we can work with OCGA to provide a letter to your sponsor, indicating that the IACUC review is under way. Many sponsors will accept this letter. However, ultimately, OCGA cannot process any award until ARC approval is obtained, with the exception of "delayed onset."

16. I am negotiating a contract. Do the same rules apply?
Yes.

Prepared July 5, 2016

17. What tips can you provide to make this process go as quickly as possible?

- Submit your funding amendment as soon as you receive a priority score that suggests a reasonable chance of being funded.
- Make sure that all of the proposed animal work is accounted for in the ARC protocol you are amending.
- Provide a complete copy of the grant proposal to oaro@research.ucla.edu for review with the amendment.
- Inform us of any deadlines.

18. I have additional questions because my situation is unique. What do I do?

Call or email us with as much detail as possible. We are here to help!