


To: FAU Research Community
From: Dr. Daniel Flynn, Vice President for Research 
Re: Grant to Compliance Congruency Process for Federally Funded Projects
Date: December 22, 2017

This memorandum serves as an official document and puts into writing the process that has been in place at Florida Atlantic University (FAU) regarding Institutional Review Board (IRB) and Institutional Animal Care and Use Committee (IACUC) congruency and a 1:1 ratio of grant proposal to approved protocol application on federally funded projects. Requirements for non-federal sponsors will be reviewed individually.

Principal Investigators (PIs) are reminded that when submitting grant proposals that involve compliance areas such as the inclusion of human or animal subjects that it is important to be aware that IRB or IACUC approvals are required prior to grant awards being issued to FAU. It is the responsibility of the PI to coordinate these efforts with the Research Integrity Office and the Office of Sponsored Programs to secure these approvals to ensure compliance prior to required deadlines.

According to the National Institute of Health (NIH) regulations, it is an institutional responsibility to confirm that the research described in a grant application is congruent with any corresponding IRB or IACUC protocols. To prevent problems of inconsistencies, the Research Integrity Office is responsible for certifying that a direct comparison of the grant proposal submitted to the sponsor and the protocol application has occurred. Furthermore, it is FAU's position that for all federally funded projects that there be a 1:1 ratio of grant proposal to approved protocol application. A direct comparison prevents problems of inconsistencies between information submitted to funding agencies and what the compliance committee reviews. FAU understands that as our federally funded research portfolio grows that this position may be modified in the future.

The NIH uses a Just-in-Time (JIT) procedure to enable specific elements of a grant application to be submitted later in the application process. IRB and IACUC approval are part of the JIT request. According to JIT procedures' <https://grants.nih.gov/grants/guide/notice-files/NOT-OD-12-101.html> PIs have sixty (60) days prior to the start date of the grant award to secure compliance approvals. Other federal sponsors, such as the National Science Foundation (NSF), allow the IRB and IACUC approvals to be submitted prior to issuance of an award. This provides lead-time for PIs to secure the required compliance approvals. PIs are encouraged to contact the Research Integrity Office and/or the Office of Sponsored Programs as soon as they receive their JIT notices (or before) to begin their protocol applications process as early as feasibly possible.

For any questions or further information, please contact Elisa Gaucher, Research Integrity Office at egaucher@fau.edu or Miriam Campo, Office of Sponsored Programs at campom@fau.edu.