

NSF Guidance on the Effects of COVID-19 on Vertebrate Animal Research

April 10, 2020

NSF has received questions with regard to how vertebrate animal protections regulations (7 USC 2131 *et seq.* and 9 CFR 1.1-4.11) apply to the activities of institutions and investigators in response to the COVID-19 outbreak. NSF understands that for a large number of studies, the conditions and timeline for conducting vertebrate animal research have become unpredictable. NSF offers the following clarification to the research community.

NSF typically requires that all projects involving vertebrate animals must have Public Health Service Approved Assurance and approval from an Institutional Animal Care and Use Committee (IACUC) before issuance of an NSF award, or a determination that the project is exempt from review. NSF understands that given the current COVID-19 pandemic, many IACUCs have suspended their activities. Accordingly, NSF will accept a review pending determination notice in place of an approval or exemption determination. NSF will be flexible with the form that this notice takes, as long it makes clear that no work with vertebrate animals, will be conducted until full IACUC approval is obtained. The PI may conduct preliminary or conceptual work that does not involve vertebrate animals while the protocol is being developed or under review, consistent with institution guidelines. In such cases, NSF will add conditions to the grant that prevent any research involving vertebrate animals from being carried out until IACUC approval has been obtained.

IACUCs, institutions, and individual researchers may wish to consult the Office of Laboratory Animal Welfare's [guidance on COVID-19 Pandemic Contingency Planning](#).