OFFICE OF RESEARCH AND DEVELOPMENT
VETERANS HEALTH ADMINISTRATION

Signatures Required on the ACORP
(Clarification by the Office of the CVMO)

(Revised May 24, 2022, to clarify the timing of the signatures required)

1. Summary. The signatures associated with the certification statements in the ACORP form
   (https://www.research.va.gov/programs/animal_research/documents.cfm#docs-c) are
   required for all protocols on this form.

2. Background. The instructions about signatures in the ACORP form (Item Z) say, “The
   typed names and dated signatures certify agreement with the terms of the ACORP, and are
   required as shown below for the Main Body and each of the attached Appendices for any
   ACORP that is to be submitted to VA Central Office for Just-In-Time approval prior to
   release of VA funding to support the work. Do not include signatures for any Appendices
   that do not apply, and which therefore should not be attached.” These instructions are silent
   about ACORPs that will not be submitted for Just-In-Time (JIT) review.

3. Issue. Because the documentation of VA compliance with regulatory requirements is
   coming under increasing scrutiny, it has become important to record the signatures of those
   who have reviewed and approved or concurred with the certification statements in the
   ACORP for all protocols on this form, and to no longer limit the signature requirement to only
   those being submitted for JIT processing.

4. Practical Implications.
   a. This change is effective immediately for any ACORP form approved after November
      23, 2020. This includes ACORP forms for new protocols, protocols granted approval
      after triennial de novo review, and approved protocols into which IACUC-approved
      amendments or modifications have been incorporated.
   b. There is no requirement to go back to previously approved ACORP forms to add the
      signatures to those.
   c. The signatures required for the applicable Appendices must be in place before work
      begins, but may be dated after the IACUC grants approval for the protocol. IACUC
      approval of the protocol includes approval by the IACUC of the work with animals
      described in the Appendices, but does not require or imply prior approval of the
      aspects related to safety, radiation, or use of human clinical resources, that must be
      certified by the corresponding other signatures on those Appendices.
   d. The signatures of the Chair and Attending Veterinarian, required on every ACORP
      that is approved by the IACUC, certify the review and approval of the IACUC, so they
      must be dated on or after the date of that approval, and on or before the effective
date of the approval indicated in the official notification to the PI about the approval of the protocol.
e. The signature of the PI is needed on the final version of the ACORP that is approved by the IACUC, before the work approved for the protocol may begin. The PI may sign at the time of initial submission of the ACORP to the IACUC for review and approval, but if modifications are required by the IACUC before approval is granted, the PI must sign the modified version as well.
f. These enhanced signature requirements also apply to any ACORP approved by an IACUC of record hosted by another institution. The certification signatures of the PI, Chair, and AV (ACORP item Z.1) are also required by VA when an IACUC of record hosted by another institution approves a protocol for JIT submission, on the host institution’s protocol form.