

## Harvard School of Public Health

### Policy for Faculty Effort on Sponsored Awards

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#### Introduction

Salary and effort charged to federal grants and contracts are regulated by OMB Circular A-21 and other federal regulations including the NIH Grants Policy Statement. HSPH Faculty are expected to charge their time commensurate with the effort expended on all activities they perform in their academic position and to certify this effort during the [Annual Faculty Effort Certification process \(AFEC\)](#).

#### General Principles

Faculty may have several professional commitments in fulfilling their role at the School in addition to commitments to Sponsors to perform research. These commitments, also referred to as “other activities”, often include teaching, mentoring and advising and other administrative duties such as preparation of grant applications, reviewing manuscripts or grants, etc. The time spent on these other activities cannot be charged to sponsored awards. When a portion of a faculty member’s salary is funded through federal sponsored projects, it is essential that there be another source of salary support for activities that are not allowable or allocable directly to sponsored projects under OMB Circular A-21.

#### Policy

Faculty can charge up to 90% effort annually on sponsored awards if their other responsibilities are less than or equal to 10% time and effort. At the discretion of department administration, under the appropriate circumstances, faculty can charge up to a maximum of 95% effort annually. Faculty cannot be charged 100% to awards if they do ANY teaching, grant writing, serve on committees or perform any other administrative duties.

#### Responsibility for Compliance

Ultimate responsibility for compliance rests with the PI. Departmental administration will monitor faculty effort on an ongoing basis. SPA will aid in the review of PI/Key Personnel effort at just-in-time phase and progress report submission.