

# HARVARD MEDICAL SCHOOL/HARVARD SCHOOL OF DENTAL MEDICINE POLICY FOR PI-ELIGIBLE FACULTY<sup>1</sup> EFFORT ON SPONSORED AWARDS

Revised September 2014<sup>2</sup>

## I. Introduction

Salary and effort charged to federal grants and contracts are regulated by OMB Circular A-21 until December 25, 2014<sup>3</sup> and other federal regulations including the NIH Grants Policy Statement. HMS/HSDM Faculty, tenure and non-tenure track, are expected to charge their time commensurate with the effort expended on all activities they perform in their academic position.

## II. General Principles

HMS faculty engage in a variety of academic activities including teaching, mentoring research, and administration. Given the breadth of focus and activities of our faculty, it is unusual for a faculty member to devote all of his or her time to research. (Note that time spent writing grants cannot be charged to sponsored awards).

Harvard University and HMS/HSDM certify faculty effort on sponsored awards by an annual Salary Certification process. The link between salary charged and effort expended is the underlying principle of this system. Salaries charged must match effort expended over the course of the year. Significant variance must be adjusted with the time limits of the Cost Transfer Policy.

## III. Policy

Maximum Effort Threshold: Faculty can charge to reflect 95% effort annually on sponsored awards if their other responsibilities are less than or equal to 5% time and effort. Only in exceptional circumstances should faculty research effort and salary exceed 95%. Faculty cannot be charged 100% to awards, if they do ANY teaching, grant writing, serve on committees or perform any other administrative duties. Exceptions over 95% must be approved in writing, at least on an annual basis or as needed, by the Department Chair and submitted to the Office of Finance - Cost Analysis at HMS. See the attached "Request for Faculty Exception From 95% Maximum Sponsored Effort Rule".

Minimum Effort Threshold: All PIs and other Key Personnel on awards must charge effort on grants. NIH issued a clarification in 2003 regarding charging effort on federal awards: "...the contribution of Key Personnel [must be] "measurable" whether or not salaries are requested. Zero percent effort and "as needed" are not acceptable for individuals that the grantee identifies as Key Personnel." HMS policy allows a minimum of 5% effort for a PI or 1% for Key Personnel on sponsored projects without additional review or approval. Proposals that result in PI annualized effort on a sponsored award of less than 5% and no lower than 1% effort must be identified on the Proposal Routing Form at the time of application. The signature of the department chair on the form indicates approval. If a PI's effort drops below 5% any time after the proposal stage then written approval by the department chair is required. Effort below 1% is not allowed.

## IV. Responsibility for Compliance

Ultimate responsibility for compliance with this policy rests with the PI. Departmental administration will monitor PI/Key Personnel effort and alert the Chair and the PI/Key Personnel of any deviations from the policy. If salary/effort adjustments are not made to bring the faculty member into compliance or the "HMS Request for Faculty Effort Exception" is not approved, the Department Administrator or Financial Manager is expected to notify the Office of Finance - Cost Analysis at HMS.

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<sup>1</sup> PI-Eligible Faculty is herein defined as individuals who meet the PI Eligibility policy requirements and are allowed to serve as a Principal Investigator on sponsored programs submitted through HMS ([http://hlcra.harvard.edu/wp-content/uploads/sites/9/2013/04/HMS\\_PI\\_Eligibility\\_Policy.pdf](http://hlcra.harvard.edu/wp-content/uploads/sites/9/2013/04/HMS_PI_Eligibility_Policy.pdf)).

<sup>2</sup> date first effective – April 2011

<sup>3</sup> As of December 26, 2014, the policy will be regulated by Title 2 of the Code of Federal Regulations, Part 200 — Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2CFR,200).