



**HARVARD**  
**T.H. CHAN**  
**SCHOOL OF PUBLIC HEALTH**  
 Research Administration

Policy: Sponsored Effort Management

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Background

The Harvard T.H. Chan School of Public Health has established the following policy for the management of personnel effort on its sponsored projects to comply with the requirements of the *Code of Federal Regulations 2 CFR 200: Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (“Uniform Guidance”) and sponsor policies and procedures.

Institutions receiving sponsored funds have a fiduciary obligation to ensure commitments of effort made on sponsored projects comply with sponsors' terms and conditions and constitute a good faith representation of the time, personnel and funds required to complete the project. Personnel committing to work on sponsored projects must provide a reasonable estimate of the effort required to complete the project tasks as part of the research proposal and are expected to meet these effort commitments if the funding is accepted and the project is underway.

Financial penalties, expenditure disallowances, and harm to the University's and researcher's reputations may result from an inadequate effort management and reporting methodology or from failure to comply with effort-related policies and requirements. In addition, an individual's failure to comply with applicable policies and requirements may constitute a violation of university or school policy, and/or federal or state law. Violators may also be subject to sanctions, including administrative, civil and criminal investigation and prosecution, under applicable laws and regulations.

### Applicability

This policy applies to Harvard T.H. Chan School of Public Health appointees who are, or intend to be, investigators on sponsored projects.

### Summary

Investigators must make reasonable determinations of the level of effort required for a sponsored project, keep effort commitments made in the proposal subject to any changing needs of the project plan, reserve appropriate time for non-sponsored activities, maintain manageable work portfolios and expect administrators to monitor effort and make inquiries.

### Specifics

#### Institutional Base Salary

For institutions of higher education (IHE), the federal government uses the concept of Institutional Base Salary (IBS) as the basis for determining how a researcher's effort is apportioned, and what salary is represented on sponsored proposals.

IBS is defined as the annual compensation paid by an IHE for an individual's appointment, whether that individual's time is spent on research, instruction, administration, or other activities. IBS excludes any income that an individual earns outside of duties performed for the IHE. *2 CFR 200.430(h)(2)*

At the Harvard Chan School, IBS includes supplemental salary for chairs, deans and directors of programs, as well as salary earned from other Harvard schools (charged to object codes 6010 – 6040). However, bonuses and other one-time payments, and limited duration (less than 2-3

years) assignments, including Executive Education (ECPE) engagements, are not included in the IBS. Please refer to the faculty offer letter for specifics on individual faculty.

### Salary Exceeding the Federal Cap

Federal regulations require that expenses associated with sponsored projects should “identify adequately the source and application of funds for federally-funded activities.” (2 CFR 200.302) For researchers whose IBS exceeds the National Institutes of Health (NIH) salary limitation, salary not charged directly to the federal award must be contained in its own account, clearly labeled, unless otherwise approved by those in the Contacts section of this policy. The “companion account” convention has been established for this purpose.

### Reserved Time for Non-sponsored Activities

The school recognizes that researchers do more than just research during their daily routines. Our academic appointees may be engaged in a wide variety of non-sponsored activities that cannot be allocated to sponsored accounts unless deemed allowable in the sponsor’s terms and conditions.

<b>Senior and Junior Faculty</b>	Faculty must reserve a <b>minimum of 10% effort</b> to proposal writing and/or institutional service, which may include committees, mentoring and other school obligations.
<b>Other Academic Appointees</b>	Those who submit or intend to submit proposals as principal investigator (PI) on research grants must reserve a <b>minimum of 2.5% effort</b> to grant writing activities for the fiscal year, unless these activities are covered under a specific grant mechanism, such as a career award or fellowship.
<b>Teaching</b>	Each <b>2.5-credit-hour course</b> is compensated at an <b>8.5% effort commitment</b> for the fiscal year. Co-teaching arrangements and courses with lower credit-hours should reduce effort accordingly
<b>Chairs</b>	Department chairs must reserve a <b>minimum of 20% effort</b> , comprising 15% for chair/administrative duties and 5% for proposal writing. In departments with co-chairs, each co-chair must reserve a <b>minimum of 15% effort</b> , comprising 10% for co-chair/administrative duties and 5% for proposal writing.

**Waivers** for the above limits will be rare. Should a waiver be necessary, please contact the individual(s) in the [Contacts](#) section. **Waiver requests must be submitted in writing.**

### Principal Investigator Responsibilities and Effort

Measurable effort is required for a PI on sponsored projects, in proportion to the duties listed in the budget justification. In addition to scientific effort, PIs are expected to engage in writing sponsor-required reports, project oversight including supervision of project personnel, and reviewing expenses, subcontracts and effort with grant managers on a regular basis. PIs of subawards have the same obligations as those of prime awards.

The Sponsored Programs office will review the PI's effort commitment against the research plan and budget to ensure an adequate commitment is proposed. The research compliance team will monitor ongoing effort and portfolios.

### Making and Keeping Responsible Commitments on Sponsored Projects

An effort commitment represents the sponsor's understanding of the amount of time the researcher will need to devote to accomplish the project's aims. This understanding is established via the proposal or other written documents exchanged between the business official in SPA and the sponsor. When making commitments on federal proposals, researchers should keep in mind that the government is explicit in their expectation that the commitment be a reasonable estimate:

The applicant organization is responsible for verifying its eligibility and the accuracy, validity, and conformity with the most current institutional guidelines of all the administrative, fiscal, and scientific information in the application, including the Facilities and Administrative rate.

Deliberate withholding, falsification, or misrepresentation of information could result in administrative actions, such as withdrawal of an application, suspension and/or termination of an award, debarment of individuals, as well as possible criminal and/or civil penalties. The signer further certifies that

*the applicant organization will be accountable both for the appropriate use of any funds awarded and for the performance of the grant-supported project or activities resulting from this application. The grantee institution may be liable for the reimbursement of funds associated with any inappropriate or fraudulent conduct of the project activity. (SF-424 R&R Application Instructions, page G-47)*

The PI's signature on the proposal in GMAS represents their concurrence with this language. Although sponsor policy may allow effort changes, all researchers and grant managers should keep in mind the certification language above before making substantive changes in effort regardless of key person status.

Non-federal funds may or may not have sponsor-specific guidelines regarding effort commitment; however, care should be taken to treat commitments with the same respect and stewardship afforded federal awards.

### Faculty Effort on Training Grants

The Chan School offers 10% school support to Program Directors (PD/PIs or Co-PI/PDs) on sponsored training grants that do not provide sponsor-supported salary in the budget per the program announcement. For details, please see the [Faculty Effort on Training Grants Policy](#).

### Related Documents and Resources

- [Harvard Effort Reporting Policy](#)
- [Harvard Cost Sharing Policy](#)
- [Harvard Outside Activities Policy](#)
- Harvard T.H. Chan School of Public Health Sponsored Effort Management Procedures (*coming June 2023*)

### Contacts

- **Policy subject matter expert/waiver approver:** Kristie Lister, [klister@hsph.harvard.edu](mailto:klister@hsph.harvard.edu), 617-432-8141
- **Effort certification subject matter expert/School effort coordinator (eCRT):** Judy Lo, [jlo@hsph.harvard.edu](mailto:jlo@hsph.harvard.edu), 617-432- 8147

### Revision History

6/7/23	Added Faculty Effort on Training Grants section.
9/11/18	Added waiver process, added related docs, lowered other academic non-sponsored minimum, and minor wording changes.
9/18/17	Clarified chair effort.