

Summer/Research Quarter Salary Policy Statement for 9 Month Appointments, April 2009

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Policy Overview

This policy relates to the eligibility of fourth quarter salary recovery for faculty with 9 month appointments. Such recovery is typically known either as summer salary or, at the Feinberg School of Medicine, the floating research quarter salary. In Feinberg, this period can be defined otherwise by written agreement of the department chair and dean.

Policy Statement for the Charging of Summer/Research Quarter Effort to Grants and Contracts

In order to ensure that Northwestern University continues to be in compliance with all regulations applicable to federal and non-federal sponsored projects, the following policy defines charging faculty summer/research quarter salary on sponsored projects for fourth quarter effort:

1. All salary charges to sponsored projects must be consistent with the applicable Northwestern University policies, including the policy on Effort Reporting, which can be found at: <http://www.northwestern.edu/asrsp/effort.html>
2. Salaries charged to sponsored projects must only include compensation for the effort expended on those sponsored projects within the same quarter.
3. Only activities directly related to the research project such as research, writing progress reports, attending research-related conferences and/or holding research meetings can be charged to a sponsored project. Non-related activities, such as preparing/submitting competitive proposals, non-sponsor-related research, vacations, attending department/school faculty meetings, teaching, teaching preparation, administrative work, university service, and attending non-sponsor-related conferences cannot be charged to sponsored projects. In addition:
 - a. Faculty are generally expected to be at the University for the period of summer/research quarter salary support unless their research requires specific off-campus activities.
 - b. Any consulting activities conducted during the summer/research quarter are subject to the same University policies in effect during the academic year.

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Policy Implementation Guidelines

1. Up to 2.5 months of summer/research quarter salary may be charged on sponsored projects. Effort certification will be the formal documentation of compliance. Specifically,
 - a. Effort expended during one quarter does not satisfy a commitment related to the receipt of salary during another quarter.
 - b. Effort certification for the summer/research quarter only includes the activities for which the faculty member earned summer/research quarter salary in that period.
2. Any exception exceeding the 2.5 months maximum that can be charged on sponsored projects during the summer/research quarter will require an additional statement by the faculty member indicating the full extent of that quarter's effort. Such a request will require the prior approval of the faculty member's department chair (primary appointment department), Dean, and the Vice President for Research before the request for more than 2.5 months of summer/research quarter salary will be allowed.
3. Non-sponsored funds may be used to cover salary for any portion of the summer/research quarter, including the remaining 0.5 month not allowed on sponsored projects. University funds that were allocated for purposes other than faculty salary support (e.g., set-up funds for research) may not be used for summer salary support. Other restricted funds (e.g., gifts and endowments) may also be used, but are subject to the guidelines and restrictions of the sources as well as prior chair and dean approval.
4. If a faculty member has multiple appointments with different contract periods (such as 9 and 12 months), the time available for summer/research quarter for sponsored research must exclude the time reserved for the 12 month appointment.
5. The rate of pay for one full month of summer/research quarter salary should be equivalent to the aggregate monthly salary rates from all paid appointments during the academic year quarters.

Frequently Asked Questions (FAQ)

1. **Why is this policy necessary?**

Federal audit activity at other research institutions has prompted us to evaluate the current policy of allowing faculty to charge 100 percent of three months of summer salary to federal grants. Yale University recently announced a \$7.6 million settlement with the Justice Department for, among other issues, allegations that summer salary was charged 100 percent when actual effort was spent during the academic year, or on unrelated grants, or not directly related to grant activity. Northwestern needs to ensure that our policies protect faculty members and the institution. We believe this policy will clarify summer/research quarter salary charging parameters for faculty, and help us to remain compliant with current federal regulations.

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- 2. How will the transition from our current practice to this new policy occur?**
The new policy will take effect April 30, 2009 and thus will affect salary charges to grants starting with the summer of 2009. If you were planning to charge more than 2.5 months of salary to sponsored projects in the summer/research quarter then you should talk with your department chair and your dean's office about your plans.
- 3. I've already submitted sponsored proposals that include 3 months of summer salary. Given this new policy, what do I do about this?**
You can decrease your committed effort to 75 percent of that proposed without reporting it to your sponsor. The change from 3 months to 2.5 months is well within that parameter, but we would encourage you to contact the Office for Sponsored Research (OSR) who will then determine if it is necessary to inform your program manager.
- 4. I've regularly taken three months of summer/research quarter salary, if this policy limits me to 2.5 months, how will I be able to obtain the additional ½ month of salary?**
Each school or department has local conditions that may allow certain solutions to this issue. Thus, this is an issue that you should take to your department chair and/or dean's office.
- 5. Is there any case in which a faculty member can take three months of summer/research quarter salary from sponsored projects?**
Yes, the policy allows this on an exceptional basis with prior approval at the chair, dean, and the Vice-President for Research levels. You will need to specify all of your activities during this time period before the salary request will be processed and certify that only activities directly related to the research project such as research, writing progress reports, attending research-related conferences and/or holding research meetings will be charged to a sponsored project. Note: if you obtain approval for receiving salary for all 3 months then you can expend effort only on the sponsored projects that are funding your work - no other University effort or vacation days will be allowed during the summer/research quarter. A certification form that should be used to request the appropriate approvals can be accessed [here](#).

Confirmation that salary received during the summer/research quarter reflected only sponsored research activity will be obtained at the end of the quarter during the effort reporting certification process.
- 6. May I use the hours I work beyond 40 hours each week (evenings and weekends) for administrative tasks or writing proposals?**
The University and federal agencies consider effort, not time. If an investigator's effort on University activities is typically more than 40 hours per week, or includes evenings and/or weekends, then "all hours worked" constitutes 100 percent effort. Thus, one cannot use time above 40 hours per week for tasks unrelated to the sponsored project paying the summer salary.

7. May I consult during the summer?

As outlined in the summer/research quarter policy, consulting is permitted subject to the same University policies in effect during the academic year.

8. If I consult for 5 days total during the summer, how does this impact my summer salary?

External consulting time is not University effort, thus when calculating your percent effort expended during any quarter, the time you spend consulting is neither part of the denominator (i.e. the total time you spent on university activities) or the numerator (i.e., the time you spent on a particular activity). University policy limits consulting to an average of one day per week or 13 days per quarter.

9. During the summer/research quarter, if I don't use one day a week for consulting, can I use that day for other activities and still remain in compliance with federal and non-federal regulations?

No.

10. Do I have to be physically at the University during the summer?

Faculty are generally expected to be at the University for the period of summer salary support, with exceptions for travel to conferences, meetings with collaborators, or off-campus work (say at a data collection site or research institute elsewhere) that are directly related to the sponsored project that is providing summer salary support. Off-campus research is described in the policy entitled "Use of the On-Campus versus Off-Campus Facilities and Administrative Rate," which can be found at:http://www.research.northwestern.edu/osr/b_appropriate_fa.html.

11. Can I go to a conference while I am being paid from a sponsored project?

Yes, if the conference is related to the sponsored project; you must certify that the effort (time spent) at the conference is relevant to the sponsored project.

12. How is effort reporting handled in the summer quarter?

Effort reporting is required only for the portion of the summer for which you are paid. For example, if a PI is paid 1 month from a sponsored project and 1 month from a discretionary chart string for a total of 2 months, then 50 percent of the effort is attributed to the sponsored project and 50 percent to other activity. The third month (which is unpaid) is not included in effort reporting, since there is no salary attached to it.

13. Can I distribute my effort over the summer even though I specify the calendar dates for various sponsored projects to pay my summer salary?

The effort on which the summer salary is based can be distributed throughout the 3 months of summer, regardless of the month during which the summer salary is paid. For instance, if an investigator has 1 month of summer salary support from each of two sponsored projects for a total of 2 months, the investigator would be expected to spend a total of four to five weeks of work on each sponsored project over the summer (2 months total). This leaves 1 month for administrative work unrelated to the sponsored project,

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research unrelated to the grants charged for summer salary, vacations, and writing proposals. The funded research weeks can be distributed throughout the summer, with the caveat that it would not be appropriate to take a two-week vacation in July if summer salary is paid for the entire month of July. Summer salary can be paid any time during the summer, from June 16 to September 15, in half-month increments. For FSM faculty, the research quarter is negotiated with the department chair. Research quarter support need not be taken in contiguous time periods though University and FSM policies will apply during the periods involved.

14. If I receive three months of summer salary from sponsored projects can I write proposals or do administrative work?

No. If an investigator receives three months of summer salary from sponsored projects, the funding agencies do not allow for time to write proposals, work on other research, or do significant administrative work beyond de minimis activity (e.g. brief consultation with graduate students, handling an occasional non-project-related phone call or email, or attending a short, rare administrative meeting).

15. Can I use academic year salary recovery funds for my summer salary?

Northwestern's schools differ somewhat from one another; thus, within the bounds of this University-level policy, each dean could develop school-based policies and practices to best match the schools goals, objectives, and needs.

16. If I have questions regarding this policy, who should I first contact?

Please contact the Associate Dean for Research in your school.