



Cornell University

Office of the Vice Provost
for Research

Robert A. Buhrman

Senior Vice Provost for Research

John Edson Sweet Professor

222 Day Hall

Ithaca, New York 14853-2801

t. 607.255.7200

f. 607.255.9030

rab8@cornell.edu

May 6, 2009

To: Principal and Co-Principal Investigators
Re: Summer Salary Guidance and Attestation Procedure

Dear Colleagues:

I am writing to remind you of regulations related to summer compensation from sponsored projects, and to highlight several aspects that have been recently cited during the National Science Foundation Office of Inspector General (OIG) reviews of universities' charging of salaries to sponsored funds and effort reporting. I am also including information on a new attestation procedure when requesting more than 2.5 months of summer salary.

If you have already submitted a request for summer 2009 compensation, please use this information to confirm your compliance with regulations or to make changes as necessary, and complete the attestation form as discussed below.

Current University policy allows faculty on nine-month appointments to receive summer salary from sponsored funds at the compensation rate determined by their ensuing academic year salary for time spent on the associated sponsored research projects, subject to sponsor approval, restrictions, and available funds. If no more than 2.5 months of summer salary is being requested no college approval is required. Up to an additional 0.5 months of summer salary can be requested, but this requires the explicit approval of the Dean of your college. If you are seeking to be compensated for more than 2.5 months, please see the form below which must be completed and submitted to your Dean for endorsement. The Dean's office will then return the endorsed form to your administrative office for retention and will provide a copy to OSP for proposal submission monitoring.

In determining summer pay, the OIG has reiterated the following aspects of federal regulatory requirements:

- Time spent writing proposals for future funding, beyond that which is considered de minimis (e.g., less than an aggregate of one day over the entire summer), may not be charged to sponsored fund sources. Proposal writing effort, however, does not include time spent writing progress reports for existing projects, and in some cases proposal writing is an approved component of an existing award. Taking a full three months of summer salary precludes an investigator from submitting proposals during or immediately following the summer.
- Time taken for vacation may not be charged to sponsored fund sources, and is not compensated for faculty on nine month appointments.
- Summer compensation must be for work performed during the summer period and for that performed on the specific project paying the salary.

- If the faculty member undertakes other university responsibilities during the summer to a material extent, (e.g., administrative assignments, teaching, curriculum development) the effort related to these activities is included in the cumulative total of summer effort and may not be paid for by sponsored funds. Similarly, time spent during evenings and weekends on university responsibilities, including proposal writing, is considered part of an individual's total professional effort for that week. Asserting that an individual is working during their "free time" while, for example, writing proposals outside a normal workday has been rejected by the OIG as an acceptable justification for drawing summer salary from sponsored funds and writing proposals during the same pay period.
- The total effort charged to all NSF projects during a fiscal year may not exceed 2 months. Budgeted effort exceeding 2 months across multiple NSF awards does not by default provide permission to charge more than the agency limit. Specific written authorization from the agency giving permission to charge more than 2 months in a fiscal year is required.

To ensure compliance with federal regulations regarding charging salaries to sponsored funds and effort reporting, if a faculty member wishes to be compensated for more than 2.5 months of summer effort, they must sign an affidavit attesting to the fact that 100% effort will be devoted to each sponsored project for the proportion of the summer being paid by that project, and that none of the time charged will be spent on vacation, writing proposals for future funding, or undertaking other university responsibilities.

During the annual certification process, faculty must also certify that university compensated work was performed, and that the salaries charged are reasonable in relation to the work performed.

As is the case during the academic year, faculty may undertake paid consulting during the summer, at the same number of average days per month as permitted during the academic year, while working on university activities for which compensation is received (such as sponsored research, teaching, or administrative duties). Consulting limits are prorated based on percent of compensated summer effort.

I invite you to contact me (5-3732, rab8), Cathy Long (5-2946, cel3), or Jeff Silber (5-2016, jas9) if you have questions.

Sincerely,



Robert A. Buhrman
Senior Vice Provost for Research

cc: Deans
College Officers
Department Research Administrators
C. Long
J. Silber