

STAFF PARTICIPATION ON GRANTS: ADMINISTRATIVE GUIDANCE

Wake Forest encourages its faculty and staff to undertake research and other sponsored projects to serve the general good, to fulfill the university's educational mission, to contribute to knowledge, and to enhance professional development.

The university acknowledges there may be instances when staff involved in research should be compensated extra pay above their normal base salary. The university may permit *additional compensation* for research or other work that will be performed *in addition* to regularly assigned duties. Pursuant to 2 CFR 200.430 (h)(8) "Non-faculty full-time professional personnel may also earn "extra service pay" in accordance with the non-Federal entity's written policy and consistent with paragraph (h)(1)(i) of this section," therefore the Principal Investigator (PI) should check with the Office of Research and Sponsored Programs (ORSP) prior to submitting a request for additional compensation to ensure that such charges are allowable.

Procedures

Where overload compensation is requested, the assignment must be beyond the employee's primary job duties and responsibilities as described in their job description, inclusive of statements regarding "additional duties and responsibilities as assigned." The National Institutes of Health (NIH) and the National Science Foundation (NSF) define a postdoctoral position as "a temporary and defined period of mentored advanced training to enhance the professional skills and research independence needed to pursue his or her chosen career path." Teaching while a postdoctoral fellow enhances their professional skills and is not considered beyond the nature of this job description. NIH offers salary guidance for postdoctoral fellows which should be followed when preparing a proposal budget or making appointments (<https://researchtraining.nih.gov/programs/training-grants>). Full-time staff who have 100% of their salary paid by a federal or state sponsored project are not permitted to teach unless their effort on the sponsored project is reduced accordingly. In addition to the above one of the following two criteria must be met:

1. Assignment is outside the department unit; or
2. Assignment is performed outside normal working hours.

In addition, all of the following criteria must be met:

1. Vacation leave is not used to perform the assignment so that the university is not paying the employee twice;
2. Hiring a temporary employee may not be feasible;
3. Assignment clearly serves the interests of Wake Forest University; and
4. Total overload compensation in a fiscal year does not exceed 20% of annual salary.

In instances when an employee cannot be released from regular university duties to conduct sponsored projects, payments for overload employment may be permitted up to 20% (gross) of annual or 12-month salary rate. The 20% allowable overload will be placed on the fiscal year beginning July 1 and ending June 30. The rate of pay shall not exceed the equivalent of 1.5 times the regular hourly rate paid by Wake Forest. The standard work schedule for staff of the Reynolda Campus in FLSA-subject staff positions is based on 37.5 hours of work per week; only hours worked in excess of 40 hours per week are considered overtime.

The policies of the sponsoring agency shall govern overload compensation, when they are more restrictive than institutional policies. Sponsor approval must be obtained either through approval of the proposal budget or separately after the award has been received. In no event

shall the services be provided and/or compensation paid until sponsor approval is received. In addition, all additional compensation requests for staff paid 100% from a grant must be reviewed and approved by ORSP.

Ideally, if the PI plans to have full time staff work on a proposed project, he/she should request it in the budget. The budget should clearly indicate the portion of the individual's salary to be charged, the time period involved, and the justification should state that this salary will be paid as overload. Before the proposal is submitted, the staff employee's immediate supervisor will be asked to certify that his/her regular assigned duties will not be affected. This approval must be documented.

When an award is made, additional compensation should be requested in Work day in accordance with University policy.

If overload pay was not requested in the proposal budget but the PI determines that overload pay is necessary to accomplish project objectives, sponsor prior approval may be required before the overload can be paid. The PI should work with ORSP to obtain sponsor prior approval as needed. The employee's immediate supervisor will need to certify in writing that the staff member's regular assigned duties will not be affected before the request is forwarded to the sponsoring agency.

References

Wake Forest University Human Resources Department:

<https://hr.wfu.edu/quick-links/policies/>

Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards

<https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=6517c0837d6c575156dc84035dca0a2c&mc=true&n=pt2.1.200&r=PART&ty=HTML>

National Postdoctoral Association :

https://www.nationalpostdoc.org/page/What_is_a_postdoc