VANDERBILT UNIVERSITY

Office of the Interim Chancellor

November 19, 2007

To: Deans in University Central

From: Nicholas S. Zeppos, Interim Chancellor and
Provost and Vice Chancellor for Academic Affairs

Subject: Our Continuing Work on Accounting for Effort

This memorandum follows up the one I sent you in July that addressed effort declaration and certification, a memo which focused on two general principles: (1) the need to include *all* university work when calculating an individual's total institutional effort and (2) the need to be certain that no individual charges 100% of her or his university salary to federal grants or contracts during any month in which university service not connected to those grants or contracts is performed. Item (2) requires those who compensate faculty to be certain that doing so does not conflict with federal effort regulations.*

I write at this time to clarify university policy regarding faculty vacations and the effort associated with writing proposals that seek either internal or external funding. That policy is as follows.

- Faculty members on nine-month appointments in University Central may not use federal grants or contracts to provide themselves with paid vacations. In any given month during the period between the spring and fall semesters of the same calendar year (i.e., currently, during the months of June, July and August), a faculty member in University Central may be compensated from federal sources only in direct proportion to the percentage of institutional effort expended in a typical month.

  The general rule covering maximum summer support is as follows: in any given summer, a faculty member on a nine-month appointment may charge to federal grants or contracts a total of no more than 85% of three months salary, distributed appropriately. This leaves the equivalent of two summer weeks for vacation and/or other activities (2 weeks ≈ 15% of 3 summer months).

  As but one example, one might charge 100% of salary (in return for 100% effort) to grants during each of two summer months and 55% of salary (in return for 55% effort) in the third month (2.55/3.0 = 0.85), leaving two weeks in that month for non-grant-related activities.

- Exceptions to the above-stated general rule on maximum summer support may be granted as follows. A faculty member on a nine-month appointment in University Central may charge three full months of salary (i.e., 100% of summer salary) to federal sources *only* with written permission (annually) from the responsible dean. To receive that permission, a faculty member must certify annually to the dean, in writing, that he/she will take no vacation and will devote the proper level of institutional effort only to the appropriate grant-or-contract-supported work during all three summer months.

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- In nearly all circumstances, federal regulations prohibit using federal funds to compensate individuals for time spent writing proposals. This applies to all employees, including faculty members, postdoctoral fellows, research associates, and research staff. This prohibition also applies to graduate students, generally, but it does not apply to postdoctoral fellows and graduate students supported by federal training-grant stipends that require no specific service in return for that support. Because we must comply with federal regulations, our institutional policy is one and the same as those federal regulations. Implementing this policy will require special care during the summer months, when many in our community expect to be paid from federal sources.

Please refer to this memo, when needed, as you work with your faculty and staff. When questions arise, please direct them to Associate Provosts Dennis G. Hall and/or Timothy P. McNamara. Thank you for your continuing attention to our compliance obligations.

*Those considering providing compensation in any form to faculty holding primary appointments in other units must check with the primary unit to determine the effort consequences of that compensation before approving that compensation. This will be explained in more detail in a subsequent memorandum addressed to all academic deans.

cc. Dennis G. Hall
Timothy P. McNamara
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