



HMS Primary Responsible Office: Office of Research Administration (ORA)

Subject Area: Research Administration

Key Contact: ORA Senior Director, Pre-Award Services

Applicable To: All HMS & HSDM PI-Eligible Faculty

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Revision Date: July 2024

PI-Eligible Faculty Effort on Sponsored Awards

Policy Rationale

Harvard Medical School (HMS) and Harvard School of Dental Medicine (HSDM) academic appointees are expected to charge their salary commensurate with their effort expended on all activities performed within their position.

Harvard University requires all individuals who perform work under sponsored funding to comply with University policies and sponsoring agency regulations regarding the proposing, charging, and reporting of effort on those awards.

This policy outlines the specific additional requirements that apply to PI-Eligible Faculty. PI-Eligible Faculty is herein defined as individuals who meet the HMS PI Eligibility policy criteria and are allowed to serve as a Principal Investigator (PI) on sponsored programs/awards submitted through HMS/HSDM.

Policy Statement

HMS and HSDM faculty engage in a variety of professional activities including teaching, mentoring, research, and administration. Given the breadth of focus and activities of our faculty, it is unusual for a faculty member to devote all of his or her time to sponsored activities. (Note that time spent writing grant proposals cannot be charged to sponsored awards.)

Harvard University certifies faculty effort on sponsored awards via an annual salary certification process. The link between salary charged and effort expended is the underlying principle of this system. Salaries charged must reflect effort expended over the course of the fiscal year. Significant variance must be adjusted within the time limits of the [Cost Transfer Policy](#).

Maximum Effort Threshold:

Faculty may charge up to a total of 95% of their total professional Harvard effort annually on sponsored awards if their other responsibilities are less than or equal to 5% effort. Only in exceptional circumstances should faculty effort and salary on sponsored awards exceed 95%.¹ Faculty salary cannot be charged 100% to awards if they participate in any other professional activities including but not limited to teaching, grant writing, serving on committees, or performing any other administrative duties. Exceptions over 95% must be reviewed and approved in writing at least annually, or upon significant changes to effort, by the department chair and submitted to the HMS Office of Research Administration (ORA) [Research Finance team](#). Such approvals and reviews must be documented using the [Request for](#)

¹ Research Associates (charged to object code 6030) who have been granted PI eligibility should not exceed 99% effort and salary on sponsored awards.



[Faculty Exception from 95% Maximum Sponsored Effort Policy](#) form. Individuals in the role of Department Chair should use the same form to document charges of their effort in excess of 80% to sponsored awards.

Minimum Effort Threshold:

All HMS and HSDM PIs and other Key Personnel on sponsored awards must charge effort on awards proportionate to their role and inclusive of all activities related to the awarded project. Such activities include scientific effort, preparing sponsor-required progress and other reports, project oversight including supervision of project personnel, and reviewing expenses, subcontract invoices, reports, and personnel effort on a regular basis.

Per HMS policy, a minimum of 5% effort for a PI or 1% effort for other Key Personnel per sponsored project is required unless additional approval is obtained. Proposals that result in PI annualized effort on a sponsored award of less than 5% and no lower than 1% effort must be identified in the GMAS request at the time of application, and the signature of the department chair or their designated proxy must be obtained in GMAS to indicate approval. If a PI's committed effort drops below the minimum requirement any time after the proposal stage, written approval by the department chair or their designee is required. Effort below 1% is not allowed. Note that sponsors may have minimum effort requirements for specific awards (e.g., NIH R35). In such instances, the higher minimum effort requirement will apply.

These minimum effort thresholds apply regardless of whether or not the sponsor has published rules disallowing reimbursement of salaries from the award. In such cases, it is the responsibility of both the PI and department administrators to track expended effort manually and to charge the effort to a non-sponsored account.

Roles and Responsibilities

All individuals involved with the administration and conduct of sponsored awards, including central and departmental sponsored project administrators, principal investigators, and other research personnel must comply with this policy.

Ultimate responsibility for compliance with this policy rests with the PI. Departmental administration will monitor PI/Key Personnel effort and alert the Chair and the PI/Key Personnel of any deviations from the policy. If salary/effort adjustments are not made to bring the faculty member into compliance or the [Request for Faculty Exception from 95% Maximum Sponsored Effort Policy](#) form is not approved, the Department Administrator or Financial Manager is expected to notify the [HMS Office of Research Administration, Research Finance](#) team.

Definitions

PI-Eligible Faculty: individuals who meet the HMS PI eligibility policy criteria and are allowed to serve as a Principal Investigator (PI) on sponsored programs/awards submitted through HMS/HSDM.

Related Resources/Referral Links

- Salary and effort charged to federal grants and contracts are regulated by [Title 2 of the Code of Federal Regulations, Part 200 - Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards \(2CFR,200\)](#) and other federal regulations, including the [NIH Grants Policy Statement](#).
- Harvard University [Effort Reporting Policy](#)
- HMS policy on [PI Eligibility on Sponsored Programs](#)
- Harvard University [Cost Transfer Policy](#)
- Form: [HMS/HSDM Request for Faculty Exception from 95% Maximum Sponsored Effort Policy](#)

Revision History

1. April 2011

- Policy first issued.

2. September 2014

- Revised to replace reference to OMB Circular A-21 with reference to Title 2 of the Code of Federal Regulations, Part 200 - Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2CFR,200).

3. July 2024

- Reformatted using HMS policy template. Added Definitions, Related Resources/Referral Links, Revision History, and Key Words/Tags.
- Text edited for clarity. Inserted language from the University [Effort Reporting Policy](#). Removed references to NIH and Uniform Guidance, as the policy applies to all sponsored awards, including non-federal.
- Use of the Proposal Routing Form to capture the department chair's approval of less than 5% PI effort on any sponsored project is replaced with the chair's (or their proxy's) signature on the proposal in GMAS.
- Documentation of Chair's approval for exceptions to the 95% maximum effort rule for PI-Eligible faculty should be submitted to [ORA Research Finance](#). Department Chairs should use the same form to document charges of their effort in excess of 80% to sponsored awards.
- Research Associates who have been granted PI eligibility should not exceed 99% effort and salary on sponsored awards.

Key Words/Tags

Faculty effort, sponsored effort, faculty salary, PI-Eligible faculty, minimum effort, maximum effort, charging salary