

Wake Forest University: Summer Salary for faculty working on research projects

Although faculty are employed year-round by the institution and faculty compensation for the 9 month academic year is distributed over 12 months, faculty are permitted to receive summer compensation under these guidelines. Faculty are technically eligible to receive up to 3 months of compensation for time spent working on research projects during the summer term, although claiming a full 3 months is generally unrealistic from a "time-and-effort" perspective (see below). Summer salary is specifically for work performed *outside* the period of their academic obligations in the fall and spring semesters and is only available if consistent with University policy and sponsor terms and conditions. As explained further below, the availability of summer salary is subject to specific uniform federal guidance and grant sponsor terms and conditions.

How summer salary is calculated. The basis for summer compensation is the faculty member's institutional base salary (IBS) from the 9-month academic appointment. Each month of summer salary is calculated at 1/9th of the academic year salary, so the maximum is 3/9ths of IBS. NIH does not permit "enhanced" summer rates — the monthly rate charged to the grant cannot exceed 1/9th of the academic year IBS. In addition, other sponsors may have restrictions on summer salary. Faculty should therefore consult their grant terms and conditions prior to committing summer effort.

WFU Policy. Per the Wake Forest University Faculty Handbook, section 6.9, "When faculty teach and also participate in funded activities, the combination from both sources may not exceed 3/9ths of their academic year salary. This policy also extends to other salaried activities during the summer, if payment for these activities is managed under the University's payroll system." This policy sets an upper cap on the amount of summer salary for all of our WFU faculty. Faculty may request to allocate the 3/9ths pay over the months of May, June, July and August. In most cases, no more than 50% effort on grants should be requested in May and August since faculty will also have academic teaching responsibilities during those months.

Grants Policy Statement references. The governing NIH source is the NIH Grants Policy Statement (and the cost-principles sections on compensation), along with the annual NIH Guide Notice on the salary cap (the most recent being NOT-OD-25-085). These implement the compensation rules in **2 CFR 200.430 from Uniform Guidance**, which applies to all federal funding and is the federal cost principle governing personnel compensation on sponsored projects that is the foundational source for the NIH policy. The operative requirement is that charges to a federal award must be based on records that reasonably reflect the work performed, and total compensation must be reasonable for the services rendered and conform to the organization's established written policy.

In plain terms: you can only charge the grant for effort actually devoted to that grant's scope of work. If 100% of your summer salary comes from an NIH award, then by definition 100% of your professional effort that month must be on that project's scope — leaving no room for activities that are not within scope.

Effort must be real and exclusive. If someone charges a full month of summer salary to an NIH grant or other grant sponsor, they are certifying that 100% of their professional effort that month went to that project. Requesting all 3 months from one or more NIH or other federal grants means committing to full-time research effort from roughly the middle of May until the middle of August. At Wake Forest, summer salary often follows the following distribution: 0.5 months in May and August and 1 month in June/July because of required activities in May and August. However, asking for full months in June and July depends on your actual effort and cannot include vacation (see below). During a period of 100% effort, faculty cannot simultaneously teach a paid summer course, devote time to university administrative activities unrelated to the grant, draw salary from another sponsor for overlapping effort, take a significant vacation, or work on other non-sponsored responsibilities during a month fully charged to NIH. *All faculty will be required to certify their effort report, which is a legal document, and misrepresentation can result in civil or criminal penalties.*

ORSP Recommendation. We recommend that faculty cap summer effort on any single federal award at 90-95% in a given month to leave room for incidental proposal writing and other unavoidable non-sponsored activities, leading to a request for 2.5 or 2.85 months of summer support. As stated above, a faculty member should determine the amount of time they will actually spend on the research grant and request a summer salary from that grant to match their effort.

Institutional & Departmental Limits. In many cases, internal policies are more restrictive than those of the funding agency. At Wake Forest, some departments have set departmental limits of summer support. For example, HES has a policy to allow a maximum of 2.85 PM summer support (95.0%). While departments have discretion to set such limits, such limits must align with University policies and guidelines and be consistent with federal requirements.

Exceptions. There will be some situations that may require a full 3.0 months of summer funding, but these should be decided on a case by case basis.

Other Academic, Research, and Administrative (OARA) activities. Under 2 CFR 200.430, effort spent on activities outside a grant's scope of work cannot be charged to that grant. These activities typically include advising students outside the charged project, serving on thesis or administrative committees, course and curriculum development, teaching preparation, peer review and refereeing, and writing unrelated scholarly publications. This restriction applies year-round, including during summer months when faculty are drawing summer salary from a sponsored project.

The reason these activities cannot be absorbed into a 100% effort charge is that **federal effort reporting measures effort as a proportion of total professional activity, not as a fraction of a fixed 40-hour week**. The denominator is the number of hours the faculty member actually worked that week or month. Time spent on OARA activities reduces the percentage of effort available to charge to the grant, regardless of how many additional hours are worked. Certifying 100% effort on a sponsored project while devoting meaningful time to out-of-scope activities is a misrepresentation that routinely surfaces in federal audits and could be the basis for False Claims Act cases against universities and individual investigators.

Vacation is a separate issue. Vacation charged during a month of 100% effort is prohibited because faculty cannot certify 100% effort for a month in which a faculty member was not working full-time on the project. This flows from 2 CFR 200.430(i) (standards for documentation of personnel expenses) and 2 CFR 200.431 (fringe benefits/leave). By signing the attestation below, the faculty member acknowledges this stipulation if they request the full 3 months of summer salary.

Grant writing is a two-part issue. As a reminder, writing a *non-competing* progress report for the same federal award the faculty member is charging is within scope of the allowable 100% effort. Writing a *new or competing* proposal is not within the scope of the current award, so that effort should not be treated as a direct charge to the award.

The NIH salary cap. Summer salary is subject to the Executive Level II salary cap just like academic-year salary. As of January 1, 2026, the cap is \$228,000 per year, or \$19,000 per month. If a faculty member's 1/9th monthly rate exceeds that figure, the excess has to be covered by non-federal/institutional funds. For a faculty member whose 9-month IBS is below roughly \$171,000, the cap will not be exceeded.

Timing of summer salary requests. Summer salary must be requested and approved **PRIOR** to the start of those payments. Exceptions may be granted in rare cases, but retroactive payments to grants after September will not be approved to ensure that the effort reporting that starts in October is accurate.

Attestation and Certification. All faculty paid during the summer from sponsored projects will be expected to certify their effort. The certification is a signed statement by the PI (that follows) to be collected by your GCM and archived in ORSP.

"I authorize the above summer research grant salary payment(s) consistent with and in recognition of sponsor, institutional, state, and/or federal guidelines and regulations."