

FAQ: 'Full-Time and Fully Soft-Funded' Investigators Submitting Proposals

Background:

Proposal Development, defined below, is typically an unallowable activity for any PI, Co-PI, or Co-I appointed full-time and fully funded on sponsored agreement (grant) funds. Alternate funding sources are normally required for this type of activity, commensurate with the effort. In order to verify a proposal's compliance, WSU has created a simplified process that provides an opportunity for the PI's, Co-PI's, or Co-I's to ensure their proposal is compliant during the eREX routing and approval process.

Many universities have been cited for incorrectly overseeing grant/contract funds, which can lead to major financial settlements (see Yale University example below). Allegations have included researchers paying themselves summer months for time and effort unrelated to the grant and using funds for purposes not specifically related to the purpose of the grant. WSU is committed to helping support our research administration staff in making sure we remain institutionally compliant. The department may also review such individuals ahead of time in the [Soft-Funded Report](#) in the MyResearch portal.

Definitions:

"Full-Time and Fully Soft-Funded":

100% FTE **and** 100% funded on sponsored agreement(s) (Fund/Subfund 145-01 & 145-02).

"Proposal Development":

Per Uniform Guidance - CFR §200.460, Proposal Development means the activity and costs associated with preparing bids or proposals on potential federally and non-federally funded sponsored agreements or projects, including the development of data necessary to support the institution's bids or proposals.

"Employee Effort":

Effort is defined as total time spent performing University activities on a percentage basis. Employee Effort is **not** based on a "standard" 40 hour work week.

Questions:

Does the federal government allow Employee Effort for Proposal Development activities to be charged on federal projects?

No, this is unallowable per Uniform Guidance – see CFR §200.460.

Can Proposal Development costs be charged to non-federal sources?

To be allowable the costs need to have been explicitly requested in the proposals budget justification and scope of work and subsequently approved by the sponsor.

Can faculty on nine-month appointments develop proposals during the summer while not on official appointment?

Yes, faculty that are not on official appointment in the summer **are** allowed to develop proposals during those three summer months.

What is the process once ORSO receives an Investigator alert from MyResearch?

- 1) Upon eREX submission, the MyResearch database queries payroll/account information for all listed investigators for the six months prior to eREX submission.
- 2) If there are any pay periods during which an Investigator is full-time **and** fully soft-funded in those six months, a review is performed, taking into account the source(s) of funding in relation to the Proposal Development timeframe.
- 3) If this review does not find any compliance concerns, the eREX approval process will begin as normal.
- 4) If the review is completed and concerns remain, Proposal Development justification will be required as part of the eREX approval process.

What other funding sources can be used for Proposal Development?

Some examples: Development or gifts accounts (17A), Salary Accruals, Blanket Research Accounts, other non-federal sources including Fixed Price Consolidation Accounts (13Z and 14Z), Academic Administration (08) Accounts, Instructional and Department (06) Accounts, and/or Indirect Cost Recovery Accounts.

Helpful Links:

[Uniform Guidance CFR 200](#)

['Yale Daily News' story on Yale University \\$7.6M federal grant settlement](#)

['The Scientist' opinion piece on ethics in science and research](#)