

# MANCHESTER UNIVERSITY

## INTRA-INSTITUTIONAL CONSULTING POLICY

### Scope

Determines when work on an externally sponsored project, such as a grant, can be charged as supplemental pay at Manchester University due to intra-institutional consulting.

### Applies To

Any Manchester University faculty or staff member working on an externally sponsored project, such as a grant.

### Introduction

Work on an externally sponsored project, such as a grant, can be charged as supplemental pay at Manchester University only in rare cases. Except in these rare cases, federal regulations and sponsor policies prevent the University from charging extra compensation payments (i.e., compensation in excess of an employee's institutional base salary) to externally sponsored projects. See Manchester University's compensation policy in the Office of Institutional Effectiveness for more information about institutional base salary. See your job description, appointment letter, or contract for a written definition of work covered by your institutional base salary.

### Policy

Under federal regulation 2 CFR Part 200 and institutional policy, MU employees are ineligible to receive supplemental salary for work on a sponsored project during their contracted period unless intra-institutional consulting is being performed. If the employee is participating in intra-institutional consulting, all three stated criteria below must be met to receive supplemental salary. Supplemental salary is not an allowable expenditure for principal investigators/project directors or co-principal investigators/project directors. In order for others to receive supplemental salary from an externally sponsored agreement, the work performed must be:

- Across departmental lines, or involving a separate or remote operation;
- In addition to his/her regular responsibilities/normal workload; and
- Approved in the sponsored agreement or award notice, or approved in writing by the sponsoring agency.

Supplemental salary charges must:

- Be commensurate with the institutional base salary rate of pay and the amount of additional work performed.
- Fall within the salary structure and pay ranges established by and documented in writing or otherwise applicable to the non-Federal entity.
- Be documented in Time & Effort reports.

## Regulation Information

### Federally-Sponsored Projects

Federal regulations (2 CFR Part 200, Uniform Guidance) state:

*Intra-IHE [Institution of Higher Education] consulting by faculty is assumed to be undertaken as an IHE obligation requiring no compensation in addition to IBS [institutional base salary]. However, in unusual cases where consultation is across departmental lines or involves a separate or remote operation, and the work performed by the faculty member is in addition to his or her regular responsibilities, any charges for such work representing additional compensation above IBS are allowable provided that such consulting arrangements are specifically provided for in the Federal award or approved in writing by the Federal awarding agency.*

....

*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 [see 2 CFR Part 200 for details].*

### Non-Federally Sponsored Projects

Federal regulations also address intra-institutional consulting for non-federal awards, which must be treated in a manner consistent with federal awards. Regulations (2 CFR Part 200, Uniform Guidance) state:

*Extra Service Pay normally represents overload compensation, subject to institutional compensation policies for services above and beyond IBS. Where extra service pay is a result of Intra-IHE consulting, it is subject to the same requirements of paragraph (b) [see 2 CFR Part 200 for details] above. It is allowable if all of the following conditions are met:*

- (i) The non-Federal entity establishes consistent written policies which apply uniformly to all faculty members, not just those working on Federal awards.*