

University of Nevada, Reno Policy on the National Science Foundation 2 Month Rule

It is the policy of the University of Nevada, Reno (UNR) to comply with the National Science Foundation's (NSF) regulations concerning Senior Project Personnel Salaries & Wages. This includes the regulation commonly known as the NSF 2 Months Rule.

Without written NSF approval, any salary paid to UNR employees who are listed as Senior Project Personnel where the total salary paid is greater than 2 months of the employee's base salary is considered to have exceeded the 2 month rule. The excessive salary will be considered unallowable and must be repaid to NSF by transferring the charges to a non-sponsored institutional account.

NSF 2 Month Scenarios

It is anticipated that faculty members may exceed the 2 month limit in one the following scenarios:

1. Proposing more than 2 months salary support on one NSF project
2. Being awarded more than one project where the combined salary support exceeds 2 months
3. Charging more than the proposed salary (where the salary was less than two months) to the project account

Scenario Solutions

Scenario 1: Where the requested salary support exceeds the 2 month limit, the following statement should be inserted into the proposal budget justification:

The proposed salary for (insert name), exceeds the 2 month limit for senior personnel. The proposed level of commitment for this proposal is appropriate to the scope of work and is required in order to fulfill the objectives of this project within the proposed timeframe.

Note: If NSF approves a proposal budget that includes more than 2 months salary, the award notice constitutes NSF approval of the additional effort and salary.

Scenario 2: Where the requested salary support combined with existing support on currently held NSF projects exceeds the 2 month limit, the statement below should be inserted into the proposal budget justification:

The proposed salary for (insert name), in combination with other current NSF support (insert award numbers), exceeds the 2 month limit for senior personnel. The proposed level of commitment for this proposal is appropriate to the scope of work and is required in order to fulfill the objectives of this project within the proposed timeframe.

Scenario 3: In the event that a faculty member needs to increase their effort on the project and the corresponding salary will exceed the two month limit, it is imperative that prior written approval is obtained from NSF before the work occurs. The principal investigator should work with the Program Manager for Research Compliance in OSP to request approval from NSF. The request must include a scope of work impact statement.

NSF Salary Calculator

The Office of Sponsored Projects (OSP) now requires that all key personnel submit an NSF Salary Calculator (available at the OSP Forms webpage) with all NSF proposals. The NSF Salary Calculator is a tool to manage proposed and awarded effort on NSF projects.

Compliance

Each faculty member with NSF support is responsible for their own compliance with these policies. The Program Manager for Research Compliance will audit the total salary charged to NSF for each faculty member in August for the prior fiscal year period ending June 30th. Any salary that is determined to have been paid in excess of the 2 month limit for which there is not written approval from NSF will be considered unallowable and must be repaid to NSF by transferring the charges to a non-sponsored institutional account.