

	Faculty Research Allocation on Non-Federal Grants	Responsible Administrative Unit: Office of the Vice President of Research and Technology Transfer
	Issued: 10/14/2015 Revised: 10/14/2015	Policy Contact: The person who is charged with implementing the policy: The Director of Research Development kinzel@mines.edu

1.0 BACKGROUND AND PURPOSE

The purpose of this policy is to clarify the Colorado School of Mines' policy on the allocation of faculty time and indirect costs (IDC; i.e., 'overhead') on non-Federal grants.

The Colorado Revised Statutes state that the Colorado School of Mines, as a public institution of the State of Colorado, 'cannot donate or grant its property to or in aid of a private corporation in contravention of the State's Constitution'. This has substantial implications for receiving grants from non-Federal sources.

2.0 POLICY

1. Research projects with graduate research assistants, post-docs, or other fellowship holders, performing project tasks require faculty supervision. If no faculty support is provided in a project's budget, the institution is *de facto* providing cost share through the faculty member's time effort and is, therefore, aiding a non-Federal entity. This is prohibited by State statute. Consequently, there must be explicit faculty support (i.e., 'charge out') in the project budget that is commensurate with the amount of supervision required.
2. A Federal guideline for faculty effort for graduate research assistants is 1 – 3% per graduate student supervised. Because we want to achieve parity between Federal and non-Federal grants in terms of policy, this level of effort should be considered for non-Federal projects.
3. Similarly, non-Federal projects must be budgeted to carry the full cost of research, as reflected in the overhead rate, as determined by the Office of Naval Research. As a State institution, we are prohibited from performing non-Federal research at a discounted cost by contributing effort to the project.