

Overview

National Institutes of Health (NIH) Notice [NOT-OD-02-017](#) defines Graduate Student Researcher (GSR) compensation for those GSRs funded by NIH research grants or cooperative agreements. GSR compensation includes total salary or wages, fringe benefits and tuition remission from all NIH sources. The notice established a policy related to the level of compensation for graduate students supported by funds from the NIH. This policy applies to all graduate students at the institution supported by research grants or cooperative agreements funded by the NIH; it does not apply to graduate students receiving compensation under a Kirschstein-NRSA training grant or fellowship.

For those students that are supported by Kirschstein-NRSA awards, specific guidelines are outlined in the NIH Grants Policy statement regarding any additional compensation. Information can be found in the NIH Grants Policy Statement (NIH GPS) in section 11.2.10.1 Stipend Supplementation and 11.2.10.2 Compensation found at [NIH GPS 11.2.10](#); UCSF guidance is available [How to Obtain Approval for Additional Compensation from Federal Funds for T32/F32 Postdoctoral Fellows](#).

This guidance further defines how a GSR can receive support under a NIH research grant or cooperative agreement.

UCSF Guidelines

UCSF allows for the following (see details below):

- Allowable GSR compensation of salary, benefits, and tuition remission is limited by the UCSF's contractual compensation level for first year post-docs (salary and benefits).
- GSR compensation that is in excess of the NIH scale 0 for postdoctoral stipends may be re-budgeted within the award.

Establishing GSR Compensation

UCSF allows a GSR to be supported from a variety of sources to help defray the costs of their education. Most programs designate an annual stipend level for their students and will provide support up to that amount. In order to provide this support, many GSRs are appointed by their faculty mentor to perform work on a funded research grant. When this situation arises, departments must be aware of the rules stated in [NOT-OD-02-017](#). GSRs working on NIH research awards cannot receive compensation over the NIH stipend level 0 applicable for the award(s) that they are receiving funding from, generally set to NRSA postdoc.

Example

Based on FY2019 Levels	Total for One Year, Full-time
NIH NRSA stipend level for zero-level postdoctoral scholar	\$ 50,004
Maximum amount NIH will award for GSR compensation	\$ 50,004
UCSF contractual compensation for first year postdoctoral scholar (salary of \$52,896 + fringe benefits of \$12,166 at 23% rate)	\$ 65,062
UCSF minimum compensation level for federal funded GSR (salary of \$40,272, 1% fringe benefits of \$403, and tuition remission of \$17,933)	\$ 58,608
UCSF maximum compensation level for federal funded GSR (salary, fringe benefits, and tuition remission)	\$ 65,062

In this example, the PI budgets at the proposal stage for a GSR at actual cost for salary, fringe benefits and tuition remission as needed on the project (up to the UCSF first year postdoctoral scholar total compensation level) and according to established University rates: a portion of the budget is included in the *GSR Compensation* line and a portion in the *Other Expense* line. The total allowable cost for a full-time GSR for one year is \$65,062; \$50,004 and \$15,058 will be budgeted as *GSR Compensation* and *Other Expense*, respectively. NIH will award \$50,004 for the GSR. The PI may re-budget after the award is issued and charge to the award \$65,062 for the GSR.

Re-budgeting

[NOT-OD-02-017](#) allows for institutions to re-budget funds to charge more than the awarded amount as long as the principles surrounding reasonable compensation are followed and as long as a GSR is not paid at a rate higher than the amount provided to a first year postdoctoral scientist at the same institution. UCSF achieves compliance with these principles using the University of California Academic Personnel Manual, which sets forth the Postdoctoral Scholar Salary levels in [APM-390 Postdoctoral Scholars](#); specifically see [Salary Scale revisions](#). A benefit rate is added to provide total first-year postdoctoral scholar compensation; current benefit rates are available at <https://osr.ucsf.edu/fringe-benefit-rates>.

NOT-OD-02-017 further states that “actual institutional-based compensation *should* be requested and information justifying the requested compensation level *should* be provided.” To ensure compliance with the NIH policy and maximize NIH funding, UCSF has established the following procedures:

- PIs may budget up to the first year postdoctoral scholar stipend level, including benefits, for graduate student compensation.
 - For purposes of proposal budgeting, applicable inflation rates on salary and fringe benefits are applied to establish the first year postdoctoral compensation level each year.
 - NIH will only award up to the zero-level postdoctoral scholar stipend for graduate student compensation.
- PIs may re-budget NIH funds to charge up to the UCSF first year postdoctoral scholar stipend level, including benefits, based on current UCSF compensation scales.
- Formal re-budgeting is not necessary unless the change exceeds 25% of the total award amount.

These salary levels only apply to NIH research grants or cooperative agreements and do not apply to training and fellowship grants or projects funded by other sponsors. NIH training and fellowship grants are subject to the NRSA stipend levels without exception.

GSR Funding Allowability

There are many avenues that a graduate student may receive support. Please refer to the following matrix to identify the allowability of the funding and at what level the GSR can be supported.

Graduate Student Researcher Funding Allowability Matrix

NIH RXX, UXX, PXX	NRSA F30, F31, T32	PRIVATE OR FEDERAL NON-NIH	COMPENSATION RULING
x			NIH: Compensation maximum is UCSF salary level to the extent there is budget available
x, x			NIH: Combined compensation maximum is UCSF salary level to the extent there is budget available
x		x	NIH: Compensation maximum is UCSF salary level to the extent there is budget available Private and Federal Non-NIH: <ul style="list-style-type: none"> Follow sponsor's compensation guideline UCSF does not define a maximum that can be received from these sources Specific graduate programs determines compensation levels annually
	x	x	NRSA: Defined by grant Private and Federal Non-NIH: <ul style="list-style-type: none"> Follow sponsor's compensation guideline UCSF does not define a maximum that can be received from these sources Specific graduate programs determines compensation levels annually
x	x		NIH: Compensation maximum is UCSF salary level to the extent there is budget available NRSA: Defined by grant <ul style="list-style-type: none"> This is separate from supplementing the NRSA stipend level to the level set by UCSF graduate programs Only allowed if research under Mentor's research grant is different from fellow's NRSA's planned training experience, as verified by the Mentor on the NRSA
	x, x		NRSA: Unallowable

Each x represents a source of funding for the GSR. If there is more than one x in a box, then the GSR is receiving funding from more than one award in that category.

References

NIH NOT-OD-02-017

<https://grants.nih.gov/grants/guide/notice-files/NOT-OD-02-017.html>

NIH GPS: Kirschstein-NRSA: 11.2.10.1 Stipend Supplementation & 11.2.10.2: Compensation

https://grants.nih.gov/grants/policy/nihgps_2013/nihgps_ch11.htm

NIH GPS: Cost Considerations 7.9.1: Fringe Benefits/IHE Tuition/Tuition Remission

https://grants.nih.gov/grants/policy/nihgps_2013/nihgps_ch7.htm