



Guidance for Graduate Student Compensation on NIH Research and Development Awards

Effective Date: January 2026

Responsible Office: Office for Sponsored Programs

Reason for Policy

Harvard University has established the following guidance for budgeting and managing graduate student compensation charged to National Institutes of Health (NIH) Research and Development awards in order to comply with the requirements in the NIH Grants Policy Statement on limitations for Graduate Student Compensation ([NIH Grants Policy Statement 2.3.7.9](#)).

NIH National Research Service Awards (NRSA) stipend levels are published annually through a [notice of policy change](#).

Graduate student compensation must be considered at proposal development, award stage, and during post-award management. This guidance is intended to assist research administrators in ensuring compliance with NIH policy throughout the award life cycle.

Applicability

This guidance applies to graduate student compensation, charged in whole or in part to NIH Research and Development awards managed by Harvard (e.g., R01, U01, etc.).

For graduate student compensation on other sponsored funding sources, please refer to the terms and conditions of that award.

Defining Graduate Student Compensation

Total Graduate Student compensation for the purpose of this guidance consists of:

- 1) All graduate student salary charged under object code 6140 “Students in Professional Positions, Salaries + Wages”. This salary is considered compensation in exchange for work performed.
- 2) All tuition remission, health, program or other fees charged under object code 6430 “Grad Tuition+Fee Grants”.

Note: Graduate student stipends charged under object code 6440 “Grad Stipend Grants, GENERAL” are not considered compensation for work performed and are unallowable on federal research and development awards and are therefore not subject to this guidance; however, these are allowable costs on individual fellowship (e.g., F31) and training grant (e.g., T32) awards- award types which also are not subject to this guidance.

Budgeting Graduate Student Compensation, Proposal Stage

Per the NIH Grants Policy Statement, proposed compensation for graduate students will be awarded up to the NRSA zero-level postdoctoral stipend only; postdoc fringe should not be factored into the calculation. Departments and local units should propose up to the NRSA zero-level postdoctoral stipend when preparing budgets. This means that the requested budget for one full-time graduate student’s combined salary, tuition and health related fees should not exceed the NRSA zero-level postdoc stipend amount listed at the time of proposal submission.

Costs proposed in excess of the NRSA zero-level postdoctoral stipend may be deemed unallowable and cut from the budget request upon award.

See FAQs below.

Managing Graduate Student Compensation, Award Stage

NIH allows institutions to rebudget awarded funds to charge more than the amount provided if the charges demonstrate reasonable compensation and are compliant with OMB cost principles. According to NIH, graduate student compensation will not be considered reasonable if in excess of the amount paid to a zero-level postdoc performing comparable work at the

same institution.

At Harvard, zero-level postdoctoral salary/stipend rates vary across the schools. To comply with the NIH Policy for Graduate Student Compensation during an award period, you must:

1) Use the rate of the school where the graduate student is working.

Example

If an HMS graduate student works in a FAS lab, use the FAS zero-level postdoc rate as reasonable compensation. Anything over that amount paid to a graduate student working in the FAS lab should be removed from NIH awards.

2) If the school/local unit does not have an established rate or guidelines, use the rate of the school/local unit where the PI or Primary Mentor is appointed or the lowest published university rate.

Example

If a graduate student is working at a Wyss lab under the direction of an HMS PI/primary mentor and Wyss does not have an established rate, the HMS zero-level postdoc rate should be used as reasonable compensation. Anything over the HMS zero-level postdoc stipend amount paid to a graduate student working in the Wyss lab under the direction of the HMS PI should be removed from NIH awards.

Note that the above applies whether the graduate student is a Harvard student or a student at another university (for example, MIT) who is being paid through a billing agreement. In both cases, the zero-level postdoctoral salary rate of the Harvard school where the graduate student is working should be used. This should be communicated to the student's home institution when drafting the billing agreement. If the school does not have an established rate or guidelines, use the lowest published university rate.

3) Exclude postdoc fringe from the calculation.

Rates may be found in appointment handbooks or on postdoc office websites. The following schools have published rates:

Frequently Asked Questions

1) Which zero-level postdoc rate should be used for graduate students shared between two PIs appointed at two different schools within Harvard?

Please contact your school's research administration office or the Office for Sponsored Programs (OSP) for further guidance.

2) What is included in our calculations to compare tuition, health fees and salary, and postdoc compensation?

- **For proposals**, budget actual costs for the graduate student's salary (6140) plus their tuition remission and fees (6430) up to the current (at time of proposal) NRSA zero-level postdoc stipend amount. For example:
 - If the NRSA zero-level postdoc stipend amount is \$61,008, and you are proposing 100% effort for the graduate student, then you can propose the full salary and add tuition and fees up to a total of \$61,008 for the graduate student. If you are proposing 75% effort for the graduate student, budget 75% of salary and 75% of tuition remission costs (as long as 75% of the total graduate student compensation cost is less than or equal to the NRSA zero-level postdoc stipend amount.)
- **For active awards**, use the graduate student's salary (6140) plus their tuition and fees (6430) and compare that amount to the zero-level postdoc stipend amount provided by the school/local unit.
 - For example, if a graduate student at HMS spent 100% of their time on an NIH award in 2024 and their tuition and fees plus salary equaled \$73,000. Their compensation was \$1,000 over the 2024 HMS zero-level postdoc stipend amount of \$72,000. \$1,000 would have had to be removed to a non-

sponsored account.

3) What is considered compensation for a graduate student?

Salary (6140) plus tuition remission and fees (6430).

Who Must Comply

All Principal Investigators (PIs) and administrators at Harvard University within all schools, units, divisions, University-wide initiatives, and centers who are involved with proposing and managing NIH research funding must follow this guidance.

Roles and Responsibilities

Principal Investigators (PIs)

- Responsible for ensuring compliance with federal regulations, monitoring expenditures, identifying errors that need correction, and communicating proper allocation of expenses.

Grant Managers and Department/Local Level Managing Units

- Prepare adjusting journals to remove unallowable costs from NIH awards.
- Review proposal and award budgets with PIs to ensure budgets align with NIH policy.
- Conduct an annual review of relevant funds to ensure compliance with this guidance

School/tub level officials/Office for Sponsored Programs (OSP)

- Respond to guidance questions.

Resources

- [Classification of Employee vs. Non-employee Guidance](#)
- [OSP Glossary](#)