

Institute for Medical Research, Inc.	Policy on Compensation of VA Employees by IMR	No. 107	
		Effective Date 12/22/09	
		Revision Date 3/15/10	
		Final Approval	Approved by IMR Board of Directors: 3/15/10

Purpose

To establish IMR's policy on the direct compensation of Principal Investigators by IMR.

Scope

IMR Investigators

Policy

Title 18 USC 209(a) prohibits a full time employee of the executive branch of the US government from receiving salary or any contribution to or supplementation of salary from any source other than the US as compensation for services as an employee of the United States. While the statute is clear, there may be circumstances when work on non-VA or non-profit (NP) funded projects is distinct and separate from work performed for the VA.

In these instances, to determine eligibility for non-profit compensation for a non-profit project, the first issue to be addressed is accomplished by a memorandum of understanding (MOU) obtained from VA management or a position description specifying the investigator's VA scope of work, responsibilities and VA work hours. The MOU should also address, in particular detail, any VA paid activity that is related to the proposed NPC paid activity and any other issues that may be relevant in making a compensation determination or may be perceived as a conflict of interest. To be eligible for NP compensation, a determination must be made that the work performed for NPC pay is distinct from work performed for the VA.

If a determination is made that the Investigator is eligible to receive NP compensation, hours will be documented in keeping with current IMR payroll policies.