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Supporting Information:

- Grants Policy Statement, 2010, 11.4.3.1.1: *“Teaching is an instructional activity that takes place in an organized educational or other instructional environment. Activities classified as teaching are generally carried out in a formal didactic setting.”*
  - WCMC ORC: Teaching conducted outside of a formal didactic setting, such as at bench-side, should be included in the total effort allocation if it is quantifiable in and of itself or in combination with other incidental work.
- Council on Governmental Relations, March 1, 2007, *Policies and Practices, Compensation, Effort Commitments, and Certification*: *“Institutions may set a reasonable threshold for de minimis activity, and incorporate the concept of de minimis using examples and descriptions in their institutional policies”.*
  - WCMC ORC: Activities and duties that are not explicitly related to a particular sponsored research agreement but add to the general welfare of research within a laboratory environment need not be included in considering total effort if it is not quantifiable and meets a test of reasonableness in defining it as de minimis activity. As an example; if a technician is showing another technician how to use a centrifuge than it may be considered de minimis activity and therefore not included as incidental work.
  - Circular A-21; J.10.b.(l).(c): *“In the use of any methods for apportioning salaries, it is recognized that, in an academic setting, teaching, research, service, and administration are often inextricably intermingled. A precise assessment of factors that contribute to costs is not always feasible, nor is it expected. Reliance, therefore, is placed on estimates in which a degree of tolerance is appropriate.*
- Trainees who are required by extramural sponsors to commit full-time effort to their training program, normally defined as 35 hours per week AND with no other sponsored committed effort are considered exceptions to the 98% Effort Limit. This sponsor requirement of full-time must be documented in the RFA and/or Notice of Grant Award for the training opportunity.