

## NIH Office of Intramural Research (OIR)

## Clarification on the Use of NIH Intramural Appointment Authorities for Predoctoral Students

February 25, 2015

In recent months, there has been an increasing trend of predoctoral students being assigned as Special Volunteer (SV) or Guest Researcher (GR). We are concerned about how this can lead to reduced oversight for these vulnerable trainees and about misuse of the SV/GR authorities. Thus, we are implementing the following clarification.

The Office of Intramural Research (OIR) and the Graduate Partnerships Program (GPP) requires stipend parity for Pre-doctoral scientists training at the NIH, regardless of appointment mechanism and funding source (Predoctoral IRTA, Predoctoral Visiting Fellow, Special Volunteer or Guest Researcher). All graduate students enrolled in a Ph.D., or equivalent, doctoral program and who perform research in an NIH intramural lab for six months or greater are, by definition, GPP students and are required to register with the GPP office, OITE, OIR. All GPP students must receive a total stipend in accordance with the Predoctoral IRTA/VF stipend levels located in Appendix 2 of the IRTA manual chapter (or in accordance with the appropriate CRTA levels, for NCI trainees).

For predoctoral trainees, this stipend parity policy supersedes the financial requirements of the Special Volunteer or Guest Research programs in relation to both domestic and foreign national students. Predoctoral Special Volunteers or Guest Researchers must have a stipend that is equivalents to or exceeds the Predoctoral IRTA/VF levels. In additional, for these Special Volunteers or Guest Researchers the funding must come from an outside (non-Federal) funding source. Personal funds do not count towards a trainee's stipend.

Per the IRTA and VF manual chapters, supplemental funding must be granted to Trainees who wish to come to NIH for a period of research training under the auspices of traineeships or grants awarded by outside (non-Federal) organizations or institutions, when the funding provided is insufficient to support the Trainees during research training in NIH laboratories. See the relevant section of the IRTA And VF manual chapters.

If an IC initiates an appointment for a foreign national Predoctoral student for less than six months (including those appointed for five months and a day short of the sixth), the Division of International Services (DIS), Office of Research Services (ORS) will not approve the extension of the student's immigration status until all appropriate GPP requirements are met. Making an appointment for less than six months may not be used as an approach to circumvent stipend parity.

Guest researchers who are funded by Federal funds (such as predoctoral NRSAs) or other funding sources that are incompatible with intramural supplemental funding may be granted an exemption by the DDIR/OIR to this implementation. All such exception requests must be submitted at least two months in advance through Dr. Philip Wang, OITE, who will consult with DIS (for cases involving foreign nationals) and OIR leadership for final decision on the exception request.