

**UNIVERSITY OF ROCHESTER  
OFFICE OF RESEARCH ACCOUNTING AND COSTING STANDARDS**

University of Rochester Plan Confirmation System Review Guidelines

**I. The Plan-Confirmation System Review applies to:**

All University cost centers/HR departments that have at least one employee charged to a sponsored project FAO within an HRMS department. The effort for all employees within the specific HRMS department is reviewed to ensure the payroll distribution system's integrity and compliance with standards.

**II. The following guidelines should be utilized when distributing the effort of employees in academic departments.**

1. Instruction and Departmental Research: Consists of teaching, counseling students, personal scholarly activities, public or community service, support of teaching laboratories and facilities, maintenance of student records, and all activities not defined as sponsored projects or departmental administration.
2. Sponsored Projects: All research, training, conferences and other activities supported by grants and contracts. Such effort is identified by charges to separate grant FAOs. It is expected that administrative or clerical employee's salaries will only appear as direct charges on those Federally sponsored projects where the effort is in the approved budget.
3. Departmental Administration: Effort incurred for administrative and support services that benefit joint departmental activities or objectives, e.g., serve as a department head or perform duties delegated by department head, serve on University or departmental committees, recruit students or advise them on issues not related to course work, plan and submit proposals for grants and contracts, maintain departmental budgets and accounts, or work in departmental stockrooms and libraries.

**III. Distributions may be number coded with a number requiring specific explanation.**

Code 1 - Faculty members with 100% effort distributed to sponsored projects

The reviewer needs to consider whether the individual has any institutional responsibility during the review period. The University's federal auditors have indicated that a response of "distribution ok" is not a sufficient Comment for a Code 1 distribution. An acceptable Comment for the faculty position with a Code 1 distribution might be "Professor X is relieved of all institutional duties for the September period to work 100% on sponsored research."

Code 2 - Distribution of administrative or clerical (including secretarial) time to research projects

2CFR 200 *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* ("Uniform Guidance") Subpart E §200.413(b) states "salaries of administrative and clerical staff should normally be treated as indirect (F&A) costs. Direct charging of these costs may be appropriate only if all of the following conditions are met:

- (1) Administrative or clerical services are integral to a project or activity;
- (2) Individuals involved can be specifically identified with the project or activity;
- (3) Such costs are explicitly included in the budget or have the prior written approval of the Federal awarding agency; and
- (4) The costs are not also recovered as indirect costs.

This restriction does not generally apply to non-federal awards. If a distribution is given a Code 2, a selection needs to be made to confirm the project is federal or non-federal and that the specific costs were approved by the sponsor in the budget proposal.

**Reminder: Please note that any change in distribution for the period of the Plan Confirmation System Review must be noted in the "comment" field in HRMS. It is no longer necessary to return copies of the 800 forms to ORACS for the Plan Confirmation System Review period. As always, original 800 forms should be submitted to Payroll for processing.**