

Plan Confirmation System Review (PCSR)

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Discussion Points

- Overview of PCSR Process
- Sign Off Types
- Non Coded Distributions
- Coded Distributions
- Reports and Resources



200.430, (i) Standards for Documentation

- Based on records that accurately reflect work performed
 - Be supported by a system of internal controls
 - Incorporated in official records
 - Reasonably reflect the total activity
 - Federal and other activity treated on an integrated basis
 - Salary distributed among activities and cost objectives
 - Comply with accounting policies and practices and University's written policy



200.430, (i) Standards for Documentation

- Budget estimates alone do not qualify as support for charges to Federal awards
 - System for establishing estimates produces reasonable approximation of activity performed
 - Significant changes in work activity are identified and recorded in a timely manner
 - Internal controls include process to review after-the-fact interim charges made to a Federal award based on budget



Plan Confirmation System

- Prospective distributions based on estimates
 - All activities on an integrated basis
- Review effort periodically
- Process significant changes in a timely manner
 - Submit revised (prospective/reallocate) PAFs
- Plan Confirmation System Review
 - Meets the Federal requirement for internal controls
 - Ensure an equitable distributions among activities and objectives



Plan Confirmation System Review

- At least one employee paid on a sponsored account
- Reviewer is a person in a position to verify the accuracy of the effort/payroll allocations
- Review and sign-off on all employees
- Attestation Statement signatures
 - All reviewers sign
 - Department Chair, Division Chief, or Director sign
- Run reports for your records



Electronic Processing

- HRMS
- All data is self contained
- Security
 - Controlled within HRMS
 - Based on PAF access



Electronic Processing

- Access and review of PCSR records is electronic
 - Refer to the Office of University Audit effort monitoring guidelines

- Displays Individuals Salary Percentages
 - Planned and Actual Distributions



Electronic Processing

- ORPA-L Notification
 - Federal Requirements, Guidance, FAQs
 - HRMS User Guide to Plan Confirmation System Review
 - Instructions
- Electronic Access to Data and Reports
- Attestation Statement (separate email)



Overview of Process

- Sign off Types for Employee(s)
- Decision Tree
- Non Coded Distributions
- Coded Distributions
 - 1 – Faculty Effort 100% on Sponsored Projects
 - 2 – Administrative Effort on Sponsored Projects



Sign Off Types

Not Signed Off

- Planned and Actual distributions not confirmed yet.

Sign Off - Okay

- Planned and Actual distributions display the same information and accurately reflect the effort distribution.

Override was Used – Okay Reallocation processed - Okay

- Planned distribution differs from Actual distribution because an **override** or **reallocation** was processed.

Reallocation Pending - Okay

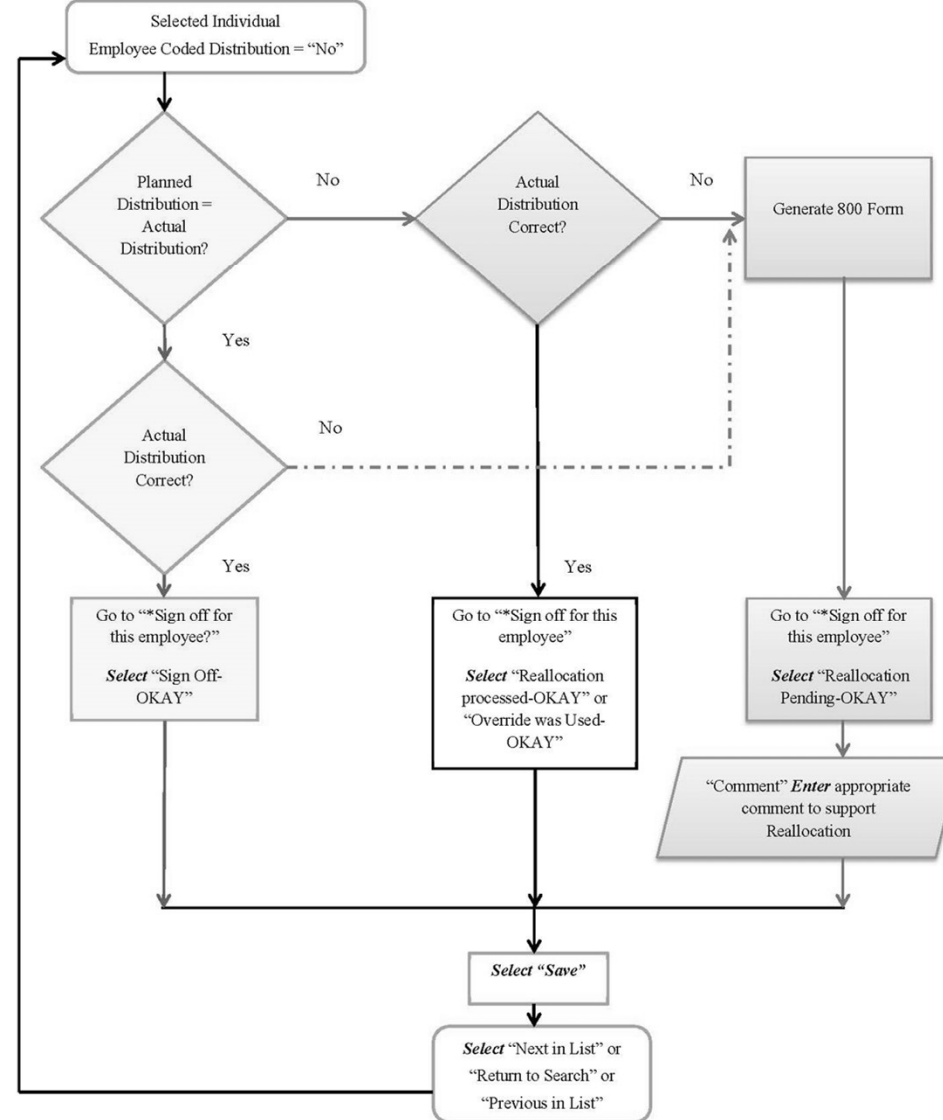
- The Actual Distribution is not correct. A reallocation was submitted to Payroll by the administrator.

Terminated - Okay

- The individual was terminated and did not receive payroll in September.



Distribution Other Than Code 1 or Code 2



Coded Distribution – Code 1

Code 1: Faculty positions with 100% effort distribution to sponsored programs.

Things to consider:

- Does this individual have any other responsibility?
- Does the faculty member have other non-sponsored related responsibility, but no pay distribution on a non-sponsored account?
- If they are truly performing activity relating 100% to sponsored projects, provide appropriate comment.



Administrative Salaries

- Are allowable when all the following conditions are met:
 1. administrative and clerical services are integral (UR interprets integral to mean the services are essential, vital, or fundamental to the project or activity) to the project
 2. person involved can be specifically identified with the project
 3. salaries are explicitly included in the project's budget or have prior written approval of the relevant federal agency
 4. salaries are not also recovered as indirect costs



Coded Distribution – Code 2

Code 2: Distribution of administrative or clerical effort directly charged to sponsored projects.

Things to consider:

- Is the project Federal or Non-Federal?
 - If the project is Non-Federal then select “Nonfederal- Approved by Sponsor”
 - This selection indicates the effort is approved by the sponsor, and meets the allowable conditions for administrative salaries.
 - If the project is Federal then select “Federal-Budg/Approv by Sponsor”
 - This selection indicates the effort is approved by the sponsor, and meets the allowable conditions for administrative salaries.
 - Select “Other” when the criteria does not meet Federal or non-Federal
 - Example: when salary was or will be reallocated to non-sponsored FAO
- If you do not have first hand knowledge, then this may require review of the budget and award documents and/or discuss with the PI or the individual.
- Adjustments to the Actual Distribution may be necessary.



PCSR Record Access & Review

- HRMS path: UR Reports and Interfaces > Labor Distribution > PCSR > PCSR – Current Year
- Search
 - Limit 500 record results
- Limit by Parameters
 - HR Dept, Job Group, etc.
- Sortable columns



Example 2 - Reallocation Processed

- Person 2 had a Planned Distribution of:
 - GR530XXX Sponsored Acct #1 10%
 - GR530XXX Sponsored Acct #2 90%
- Person 2 had an Actual Distribution of:
 - GR530XXX Sponsored Acct #1 70%
 - GR530XXX Sponsored Acct #2 10%
 - GR506XXX Sponsored Acct #3 20%

- Account Code from Where? will display “Reallocated”

- Person 2 spent his/her time in September working on a different sponsored project.

- A reallocation was processed in October 2021 for the September 2021 pay period to correct the distribution.

- Sign Off - “Reallocation processed – OKAY”



Example 3 - Reallocation Pending

- Person 3 had a Planned Distribution the same as the Actual Distribution of:
 - OP211XXX Operating Acct 50%
 - OP212XXX Operating Acct 50%

- Person 3 spent three quarters of his/her time in September working on a sponsored project and the rest of the time fulfilling departmental responsibilities.

- A reallocation needs to be processed, Generate 800 Form

- Comment is required: which includes PAF submission date and proposed distribution correction for the period.
 - *Example of appropriate comment: “800 Form submitted 10/4/2021 for GR5234XX 75% and OP212345 25%”*

- Sign Off - “Reallocation Pending – OKAY”



Example 4 - Code 1 Distribution

- Person 4 had a Planned Distribution and Actual Distribution of:
 - GR507XXX Sponsored Acct 100%
- Person 4 spent 100% of his/her time in September working on this sponsored project and had no other responsibilities during this time.
- A “Comment” is required:
 - Include notations regarding what his/her activities were for the period.
 - *Example of appropriate comment: No teaching or administrative responsibilities during this period.*



Example 5 - Code 2 Distribution

- Person 5 had a Planned Distribution and Actual Distribution of:
 - GR503XXX Sponsored Acct 67%
 - GR504XXX Sponsored Acct 33%

- “* Comments for Ledger 5” is a required field:
 - Make a selection from the drop down box
 - If “Other” is selected, then a “Comment” is required for additional explanation

- Refer to Administrative Salaries slide or OMB Circular 2 CFR 200.430 Compensation - personal services



Common Questions or pitfalls

- Review the materials
- Access (new department responsibility)
- Reviewing all employee records
- Waiting until due date to start review
- Students with FWS
- Does my department have records to review
- Reallocation Pending vs Reallocation Processed
- Selecting incorrect Code 2 comment
- Missing employees



PCSR Reports

- UR Reports and Interfaces > Labor Distribution > PCSR > PCSR Report
- UR Reports and Interfaces > Labor Distribution > PCSR > PCSR Department Status
 - Run and Filter
 - Download to Excel
 - Save for Records



Resources

- Office of University Audit effort monitoring guidelines
 - http://www.rochester.edu/adminfinance/audit/OUA_Guide_for_Auditing_Effort_Monitoring_PAF_and_PCSR_processes_Final20110303.pdf
 - University of Rochester Effort Reporting Policy
 - https://www.rochester.edu/orpa/_assets/pdf/policy_EffortReportingPolicy.pdf
- Plan Confirmation System and Payroll Distribution
 - <https://www.rochester.edu/adminfinance/finance/office-of-research-accounting-and-costing-standards-oracs/plan-confirmation-system-and-payroll-distribution/>



Questions ???

