**Effort Planning and Confirmation**

**POLICY STATEMENT**

Cornell University requires effort planning and confirmation for individuals paid with sponsored funds, federal appropriations, or committed cost sharing.

**REASON FOR POLICY**

The university receives significant funding for sponsored projects and organized research from federal and state governments, private foundations, organizations, and industry. There must be accurate effort planning and confirmation when these funds are expended for the salaries and wages of faculty and staff members and graduate assistants.

**ENTITIES AFFECTED BY THIS POLICY**

- All units of the university, excluding the Weill Cornell Medical College and Graduate School of Medical Sciences

**WHO SHOULD READ THIS POLICY**

- Administrative and department managers
- Deans, directors, and unit heads
- Business service center staff
- Grant and contract officers
- Principal investigators
- Individuals paid by sponsored projects or federal appropriations

**WEB ADDRESS FOR THIS POLICY**

- This policy: www.dfa.cornell.edu/treasurer/policyoffice/policies/volumes/finance/effort.cfm
- University Policy Office: www.policy.cornell.edu
POLICY 3.11

Effort Planning and Confirmation

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RELATED RESOURCES

University Policies and Documents
- University Policy 1.1, Cost Sharing for Sponsored Agreements
- University Policy 2.7, Reporting the Use of Facilities
- University Policy 3.20, Cost Transfers on Sponsored Agreements
- University Policy 4.14, Conflicts of Interest and Commitment
- Cost and Capital Assets Department Annual Procedures for Effort Reporting
- Faculty Handbook
- Office of Sponsored Programs Guide to Budgeting
- Kuali Financial System Standard Operating Procedures

External Documentation
- Part 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance)

University Forms and Systems
- CU Learn
- Group Certification
- Plan Confirmation Report
- Workday
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CONTACTS

Direct any general questions about this policy to your college or unit administrative office. If you have questions about specific issues, contact the following offices.

<table>
<thead>
<tr>
<th>Contacts, Ithaca Campus Units</th>
<th>Contact</th>
<th>Telephone</th>
<th>E-mail/Web Address</th>
</tr>
</thead>
</table>
| Policy Clarification and Interpretation | Cost and Capital Assets | (607) 255-3351 | uco-cost@cornell.edu  
www.dfa.cornell.edu/accounting/topics/costanalysis/ |
| Clarification on Specific Award Terms | Office of Sponsored Programs | (607) 255-5014 | osp-help@cornell.edu |
| Cost Transfers and Award Financial Terms and Conditions, Cost Sharing Accounts | Sponsored Financial Services | (607) 255-5085 | sfs-help@cornell.edu  
www.dfa.cornell.edu/accounting/topics/sponsoredfinance/ |
| Documentation, Forms and Procedures for Plan Confirmation, NIH Salary Cap | Cost and Capital Assets | (607) 255-3351 | uco-cost@cornell.edu  
www.dfa.cornell.edu/accounting/topics/costanalysis/ |
| Labor Distribution | Sponsored Financial Services | (607) 255-5085 | sfs-help@cornell.edu  
www.dfa.cornell.edu/accounting/topics/sponsoredfinance/ |
| | University Payroll Office | (607) 255-9472 | uco-payroll@cornell.edu  
www.dfa.cornell.edu/payrollservices |
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**DEFINITIONS**

These definitions apply to terms as they are used in this policy.

<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Award</strong></td>
<td>An executed agreement between Cornell University and a sponsor.</td>
</tr>
<tr>
<td><strong>Confirmation</strong></td>
<td>Verification, using suitable means, and certification that work on a particular funding source was performed, and that salaries and wages charged are reasonable in relation to that work performed.</td>
</tr>
<tr>
<td><strong>Cost Sharing</strong></td>
<td>A portion of total project or program costs related to a sponsored agreement that is contributed to a sponsored project or program by someone other than the primary sponsor.</td>
</tr>
<tr>
<td><strong>Departmental Research</strong></td>
<td>Expenditures for research activities that:</td>
</tr>
<tr>
<td></td>
<td>- Are not funded under a sponsored agreement</td>
</tr>
<tr>
<td></td>
<td>- Are not separately budgeted</td>
</tr>
<tr>
<td></td>
<td>- Are not separately accounted for</td>
</tr>
<tr>
<td></td>
<td>- Are identified in the university's general ledger with a departmental research or instruction higher education function code (41XX)</td>
</tr>
<tr>
<td></td>
<td>Departmental research generally includes professional and scholarly research funded by internal allocations, endowment income, and gifts.</td>
</tr>
<tr>
<td><strong>Effort (or Compensated Effort)</strong></td>
<td>Activities related to a faculty or staff member’s, student employee’s, or graduate assistant’s duties, for which university compensation is received. Faculty members on nine-month appointments only have summer effort during the period for which they are paid.</td>
</tr>
<tr>
<td></td>
<td>External activities paid to an individual directly, (e.g., consulting, direct fellowships) are not included.</td>
</tr>
<tr>
<td><strong>Effort, Actual</strong></td>
<td>The time that an employee or graduate assistant actually devotes to a particular sponsored project (including time pledged to a sponsor as mandatory or voluntary committed cost sharing) or other activity, expressed as a percentage of total effort.</td>
</tr>
<tr>
<td><strong>Effort, Committed</strong></td>
<td>The amount of effort proposed in a grant or other project application and accepted by a sponsor, regardless of whether salary support is requested for the effort. For example, if a National Institutes of Health (NIH) grant application proposes that an employee will devote 30 percent of his or her effort to the grant, with salary support for 10 percent of that effort, the committed effort for that employee is 30 percent.</td>
</tr>
<tr>
<td><strong>Effort Distribution</strong></td>
<td>An allocation of one's time to various activities.</td>
</tr>
<tr>
<td><strong>Firsthand Knowledge</strong></td>
<td>Direct evidence of work performed. One may have firsthand knowledge of work performance by either performing the work or supervising the individual performing the work.</td>
</tr>
<tr>
<td><strong>Higher Education Function Code</strong></td>
<td>A four-character account attribute that indicates the specific purpose or use of the funds contained in an account (e.g., research, instruction, extension).</td>
</tr>
<tr>
<td><strong>Institutional Base Salary (IBS)</strong></td>
<td>The annual compensation that Cornell pays for an employee’s base appointment, whether that employee’s time is spent on research, teaching, administration, or other activities. Institutional base salary (IBS) excludes compensation for an employee’s outside consulting activities and other compensation received from an entity other than</td>
</tr>
</tbody>
</table>
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**Effort Planning and Confirmation**

#### DEFINITIONS, continued

<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>Labor Distribution</td>
<td>An allocation of one’s efforts to specific general ledger accounts. The general ledger documents effort in the university’s books and records. <strong>Note</strong>: Labor distribution requires a conversion of time (i.e., effort) to dollars (i.e., compensation).</td>
</tr>
<tr>
<td>NIH Salary Cap</td>
<td>A federally mandated limitation of the rate of pay that may be charged to awards funded by the National Institutes of Health (NIH). This amount is established annually, and is most recently based on the federal Executive Level II salary. Special accounting procedures are necessary when an individual whose IBS exceeds the cap is charged to an NIH award.</td>
</tr>
<tr>
<td>Organized Research</td>
<td>Expenditures for research activities that: • Are funded under a sponsored agreement • Are separately budgeted • Are separately accounted for • Are identified in the university’s general ledger with an organized research higher education function code (43XX). Organized research has a specific scope of work and period of performance. Organized research also encompasses any funds used as voluntary committed or mandatory cost sharing for an organized research project. Organized research typically is supported by sponsored agreements from federal and non-federal governments and other external organizations, such as foundations or corporations.</td>
</tr>
<tr>
<td>Plan</td>
<td>A projection of effort associated with future activities.</td>
</tr>
<tr>
<td>Plan Confirmation</td>
<td>A system of documentation that includes (a) an effort plan (i.e., budgeted, planned, or assigned work activity, updated to reflect any significant changes in work distribution), and (b) effort confirmation, whereby at least annually a statement will be signed by the employee, principal investigator, or responsible official(s), using suitable means of verification. This statement must state that the work was performed, and that salaries and wages charged are reasonable in relation to the work performed.</td>
</tr>
<tr>
<td>Principal Investigator (PI)</td>
<td>The individual, designated by the university, who is responsible for the scientific or technical aspects of the grant and for day-to-day management of the project or program. In addition, the principal investigator (PI) is a member of the university team responsible for ensuring compliance with the financial and administrative aspects of the award. This individual works closely with designated officials within the grantee organization to create and maintain necessary documentation, including both technical and administrative reports; prepare justifications; appropriately acknowledge federal support of research findings in publications, announcements, news programs, and other media; and ensure compliance with other federal and organizational requirements.</td>
</tr>
<tr>
<td>Sponsor</td>
<td>Typically, federal and non-federal governments or other external organizations, such as foundations or corporations, that provide funding for research and other activities.</td>
</tr>
</tbody>
</table>
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**Effort Planning and Confirmation**

### DEFINITIONS, continued

| **Sponsored Project (or Sponsored Program)** | A project funded a sponsor through a grant, contract, cooperative agreement, or other instrument under which the university agrees to perform a certain scope of work, according to specified terms and conditions, for a specific budgeted monetary, or in-kind, compensation. For the purpose of this policy, this category includes federal appropriations (i.e., funds provided to land grant institutions pursuant to the Hatch, Smith-Level, and other federal Acts or legislation). |
| **Suitable Means of Verification** | The process through which one receives assurance that effort was provided as stated so that an effort certification may be approved by an individual not having firsthand knowledge. Suitable means of verification requires the documented review by an individual, such as the PI, project manager, supervisor, or an employee who has firsthand knowledge that the work was performed. |
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RESPONSIBILITIES

The major responsibilities each party has in connection with this policy are as follows:

<table>
<thead>
<tr>
<th>Role</th>
<th>Responsibilities</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Cost and Capital Assets</strong></td>
<td>Develop and implement plan confirmation procedures in accordance with regulations set forth in Part 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance).&lt;br&gt;${}$ Develop and provide appropriate annual training to all employees involved in the effort planning and confirmation process.&lt;br&gt;${}$ Produce effort statements for all individuals who had sponsored, cost-shared, organized research, or federal appropriations activity during the fiscal year.&lt;br&gt;${}$ Monitor the effort planning and confirmation process to ensure compliance with this policy.&lt;br&gt;${}$ Receive certifications, conduct quality assurance, and contact units about concerns and corrections.&lt;br&gt;${}$ As appropriate, report questionable practices and problems to deans, department heads, and/or the University Audit Office.</td>
</tr>
<tr>
<td><strong>Individuals Supported on Funds Requiring Certification</strong></td>
<td>Understand this policy and participate in plan confirmation training as required and/or appropriate.&lt;br&gt;${}$ Be aware of funding supporting his or her appointment.</td>
</tr>
<tr>
<td><strong>Principal Investigator</strong></td>
<td>Understand this policy and participate in plan confirmation training as required and/or appropriate.&lt;br&gt;${}$ Ensure appropriateness and accuracy of all effort expended on sponsored projects.&lt;br&gt;${}$ Notify unit business staff of the need for updates to the effort distribution system, as changes become known.&lt;br&gt;${}$ Certify, or participate in the certification of, plan confirmation with firsthand knowledge or using suitable means of verification.</td>
</tr>
<tr>
<td><strong>Principal Investigator/ Unit Administrator</strong></td>
<td>Understand this policy and participate in plan confirmation training as required and/or appropriate. PI training may be found in CU Learn by searching the catalog for “Effort Certification.”&lt;br&gt;${}$ Ensure appropriateness and accuracy of all effort expended on sponsored projects.&lt;br&gt;${}$ Provide updates to effort distribution system, as changes become known.&lt;br&gt;${}$ Coordinate and/or certify plan confirmation with firsthand knowledge or using suitable means of verification.</td>
</tr>
<tr>
<td><strong>Unit Head</strong></td>
<td>Establish effective processes and controls to achieve compliance with this policy.&lt;br&gt;${}$ Ensure accurate planning and confirmation of effort, including cost sharing.&lt;br&gt;${}$ Assume responsibility for or assign an administrator to oversee the effort planning and confirmation process.</td>
</tr>
</tbody>
</table>
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PRINCIPLES

Overview

Federal principles in the Uniform Guidance (2 CFR 200) establish standards for the recording and certification of salary charged to sponsored awards or federal appropriations. Effort directly charged to sponsored projects, federal appropriations, and cost sharing, must be identified in the university’s effort distribution/reporting system.

General Rules

1. The effort planning and confirmation system must reflect only the activity for which the investigator or employee is compensated by Cornell. External activities, such as consulting or non-university committees, are not to be included.

2. Cornell is required to record effort as a percentage of total compensated activities, not as hours worked. All of an employee’s or graduate assistant’s compensated activities equal 100 percent of Cornell effort, regardless of whether they are accomplished in 30, 40 or 50 hours per week, and regardless of the appointment FTE.

3. The certifying individual must have firsthand knowledge of the effort performed, or obtain suitable means of verification from someone with firsthand knowledge.

   ◆ Note: “Suitable means of verification” requires the documentation of the affirmative steps taken to confirm that the work was performed in relation to the accounts charged.

4. The principal investigator (PI) must ensure that effort allocated to the project under his or her direction is reasonable. To achieve this, The PI may work with unit administrators, project team leaders, and supported employees, as appropriate.

5. Any unit certifying departmentally must document in writing “suitable means of verification that the work was performed.” A good example of documenting “suitable means” includes obtaining salary distributions (or individual reports) reviewed and signed by the PI or supervisor. A group certification, signed by an administrator, without a documented review by the PI, supervisor, or individual ensuring that the work was performed is not acceptable.
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PRINCIPLES, continued

Method of Reporting  The Uniform Guidance §430(i) describes standards for documentation of personnel expenses. Cornell uses a “Plan Confirmation” method, which is normally coordinated by the department or unit administrative manager, in consultation with the PI, as necessary. The Plan Confirmation method requires that at the beginning of each fiscal year salaries and wages be planned and distributed to various activities based upon the individual’s expected effort for that fiscal year. The plan is recorded in the university’s payroll system as the labor distribution for that individual. When significant changes (defined here as more than a 10 percent deviation from the base amount) in effort become known, adjustments to the effort distribution must be made in a timely fashion using the Salary Expense Transfer e-doc in the Kuali Financial System (KFS) or costing allocation change in Workday, and constitute an alteration of the plan. Approving such a change in KFS or Workday signifies that the signer received PI approval for the modification. At the end of the year, this distribution is confirmed on the annual certification document. For sponsored agreements, any change of effort greater than 25 percent of that committed typically requires sponsor approval. Percentage changes are measured as a change from the base amount. For example, a 25 percent reduction to a 40 percent commitment yields 30 percent effort.
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PROCEDURES

Effort Planning and Reporting

The unit administrator, in collaboration with the principal investigator (PI), must perform the following tasks in the effort planning and reporting process:

1. Develop an effort plan for each individual before the end of July of each fiscal year.

2. Periodically, review effort distribution for appropriateness and accuracy of effort expended on all projects. It is recommended that the review be done monthly, but is required no less frequently than bimonthly.

Caution: Sponsored projects must not be charged for unrelated activities beyond a de minimis level. Such activities, which include proposal writing, must be charged to other institutional funds.

3. Complete a Salary Expense Transfer (ST) e-doc in the Kuali Financial System (KFS) for retroactive adjustments. Update Workday for prospective changes. (See Related Resources.)

4. Following the instructions and training issued each year by the Cost and Capital Assets department, verify and sign a plan confirmation statement, at least annually, using suitable means of verification that activities identified in the university’s system of record (i.e., KFS) are reasonable in relation to work performed.

Table 1
Effort Categories and Corresponding Higher Education Function Codes

<table>
<thead>
<tr>
<th>Effort Categories</th>
<th>Instruction &amp; Departmental Research</th>
<th>Organized Research</th>
<th>Extension and Public Service</th>
</tr>
</thead>
<tbody>
<tr>
<td>Accounting Function Codes</td>
<td>41XX</td>
<td>43XX</td>
<td>44XX</td>
</tr>
</tbody>
</table>

| Sample Activities | | |
|-------------------|------------------|-----------------|----------------------|
| Administrative activities | Advising | Committee work | Curriculum development |
| Departmental research | Hiring and supervising | Proposal preparation | Supervising teaching assistants |
| Teaching credit or non-credit courses | | | |

Research projects meeting the definition in the notes below.

Research training grants

Public service
Extension projects
Outreach
Conferences
**POLICY 3.11**

**Effort Planning and Confirmation**

**PROCEDURES, continued**

**Notes:**

1. The Uniform Guidance defines “Organized Research” as “all research and development activities of an institution that are separately budgeted and accounted for.” The classification of Organized Research (higher education function codes 43XX) should include only the effort spent on research, whether it is paid by the sponsor or Cornell, not proposal writing or administrative functions connected with that organized research project, such as other management or supervisory effort connected with recruiting faculty or administrative staff.

2. See the Account standard operating procedure for more information on higher education function codes.

**Plan Confirmation**

At least once each year, the actual effort of individuals requiring certification must be reviewed and confirmed by that individual or someone with firsthand knowledge of the effort performance. Effort should be reviewed and confirmed at the same time the plan for the next year is established. Updating a costing allocation in Workday constitutes a formal modification of the plan. The table below outlines the steps that must be taken.

*Table 2  Plan Confirmation Procedures*

<table>
<thead>
<tr>
<th>Who</th>
<th>What</th>
<th>When</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Cost and Capital Assets</td>
<td>Produce plan confirmation reports</td>
<td>May and August</td>
<td>Produce reports, including year-to-date activity for all individuals who had sponsored, cost-shared, organized research, or federal appropriations activity during the fiscal year.</td>
</tr>
<tr>
<td></td>
<td>Provide annual training and instructions</td>
<td>April and May</td>
<td>Conduct annual training based on the instructions for the year’s effort certification process.</td>
</tr>
<tr>
<td></td>
<td>Receive and review reports</td>
<td>After submission deadline and throughout the year</td>
<td>Receive certifications, conduct quality assurance, and contact units for concerns and corrections.</td>
</tr>
<tr>
<td>2 Unit Administrator</td>
<td>Provide information on plan confirmation to unit</td>
<td>May-June and as needed throughout the year</td>
<td>Inform principal investigators and supported individuals of their role in the plan confirmation process. Inform individuals of the funds supporting their appointment.</td>
</tr>
<tr>
<td></td>
<td>Verify that principal investigators and/or supported individuals received required statements to confirm</td>
<td>By established deadlines</td>
<td>Notify Cost and Capital Assets immediately if individuals working on sponsored activity do not receive a report.</td>
</tr>
<tr>
<td></td>
<td>Review project data</td>
<td>Monthly or bimonthly</td>
<td>Participate in the process of monitoring project costs, especially as it relates to individuals appointed on sponsored funds. Review account statements, plan confirmation, or labor distribution data as appropriate.</td>
</tr>
</tbody>
</table>
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<table>
<thead>
<tr>
<th>Who</th>
<th>What</th>
<th>When</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>3 Principal Investigator/Unit Administrator</td>
<td>Monitor personnel charges on sponsored awards</td>
<td>Throughout the year</td>
<td>Review labor distribution. Correct prospective allocations in Workday, and retroactive changes in KFS using the ST e-doc. (See Related Resources.)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Review Plan Confirmation Data</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4 Principal Investigator/Employee or Individual with Firsthand Knowledge</td>
<td>Certify plan confirmation(s) individually or departmentally</td>
<td>Prior to annual deadline</td>
<td>Obtain the employee's total effort and confirmation statement (preferably, this is done by the individual requiring certification or the principal investigator). Return the completed report and copies of any adjusted entries to Cost and Capital Assets, Division of Financial Affairs, 341 Pine Tree Road.</td>
</tr>
<tr>
<td>5 Principal Investigators, Unit Administrators, and Others Involved in the Plan Confirmation Process</td>
<td>Participate in training</td>
<td>Annually or as determined by Cost and Capital Assets department</td>
<td>Participate in training on effort certification and the plan confirmation process. Training may vary for those administering the process in a unit from those signing certifications. Contact Cost and Capital Assets for the current training requirements. PI training may be found in CU Learn by searching the catalog for “Effort Certification.”</td>
</tr>
</tbody>
</table>

NIH Salary Cap

Every year since 1990, Congress has legislatively mandated a provision limiting the direct salary that an individual may receive under a National Institutes of Health (NIH) grant. For the purposes of the salary limitation, the NIH terms "direct salary," "salary," and "institutional base salary" have the same meaning. Base salary excludes any income that an individual may be permitted to earn outside of the duties to Cornell.

NIH grant/contract awards for applications/proposals that requested direct salaries of individuals in excess of the applicable rate per year are adjusted by the NIH in accordance with the legislative salary limitation, and include a notification such as the following: None of the funds in this award shall be used to pay the salary of an individual at a rate in excess of the applicable salary cap. Please see the salary cap summary and the time frames associated with salary caps at http://grants.nih.gov/grants/policy/salcap_summary.htm. Special accounting procedures are necessary when an individual whose institutional base salary (IBS) exceeds the cap is charged to an NIH award.

To document proper treatment of the salary limitation a separate cost sharing sub-account, funded by unrestricted institutional funds, must be established on each
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Effort Planning and Confirmation

PROCEDURES, continued

award for each person exceeding the cap. The sub-account title should begin with “NIH CAP” followed by the description of the unit’s choosing. The portion of the salary exceeding the cap is charged to this account.

For example:

1. Salary cap = $180,000/year. This translates to a nine-month salary of $135,000, or $15,000/month. Current salary caps may be found at http://grants.nih.gov/grants/policy/salcap_summary.htm.
2. Individual’s IBS = $144,000/nine-month academic year.
3. Individual’s charged effort on the project = 10%.

Since the individual is over the cap, the maximum that can be charged to the award for the 10% effort is $13,500 (10% effort times the nine-month cap of $135,000). During this period, though, the individual is paid $14,400 for that same effort (10% effort times the nine-month salary rate). As a result, $900 ($14,400 minus $13,500) must be charged to the cost sharing sub-account. The Workday costing allocation would reflect charging 9.375% ($13,500 divided by $144,000) to the NIH award, and 0.625% ($900 divided by $144,000) to the cost sharing sub-account. You will note that these two percentages equal the 10% effort.

Mathematically, the Workday costing percentage can be determined by:

1. Percent charged to award = (Effort * Cap) / IBS
2. Percent charged to cost sharing sub-account = [(Effort * IBS) – (Effort * Cap)] / IBS

To determine the amount that should be in each KFS account or sub-account:

1. Award account = Effort * Cap
2. Cost sharing sub-account = (Effort * IBS) – (Effort * Cap)

For further assistance on managing the salary cap, or on establishing sponsored sub-accounts, please refer to the Contacts section of this policy.
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APPENDIX A: SAMPLE PLAN CONFIRMATION REPORT

Plan Confirmation Report Individual Report 06-2012

<table>
<thead>
<tr>
<th>Name</th>
<th>Position Number</th>
<th>Position Desc</th>
</tr>
</thead>
<tbody>
<tr>
<td>Smith, Michael</td>
<td>120551</td>
<td>Professor</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Academic Year Distribution</th>
<th>FY12 Actual Dollars</th>
</tr>
</thead>
<tbody>
<tr>
<td>FY12 Actual Effort</td>
<td>FY13 Plan Effort</td>
</tr>
<tr>
<td>-----------------------</td>
<td>-------------------</td>
</tr>
<tr>
<td>0.27</td>
<td>0.00</td>
</tr>
<tr>
<td>0.14</td>
<td>0.00</td>
</tr>
<tr>
<td>0.38</td>
<td>0.00</td>
</tr>
<tr>
<td>0.68</td>
<td>0.00</td>
</tr>
<tr>
<td>0.12</td>
<td>0.00</td>
</tr>
</tbody>
</table>

Academic Year Distribution Total: 99,000.00

But to the best of our knowledge and without notice to the department or its employees, the statements are correct and complete. Any changes in the distribution of effort must be reported to the Office of Sponsored Programs. Personnel changes in the academic year must be reported to the Office of Sponsored Programs. Personnel changes in the academic year must be reported to the Office of Sponsored Programs.

Note: See Accounting Systems Structure and Transactions Policy for further information on account numbers.

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