



H I G H E R E D U C A T I O N

SUGGESTED SIMPLIFICATION CHANGES TO CIRCULAR A-21

**Gary Talesnik
KPMG Consulting, Inc**

Disclosure Statements

- Discontinue Disclosure Statements or Simplify Requirements
- If Continued, Limit Reporting and Amendments to Major Cost Accounting Practices Related to Federal Programs
- Raise Submission Threshold

Interest Costs

- Eliminate Requirement for Lease-Purchase Analysis
- Drop or Simplify Requirement for Computing and Adjusting Interest Expense for Excess Cash Flow
- Drop Requirement for Notification and Cost Adjustments for “Substantial Relocation” of Federal Programs from Financed Facilities
- Allow Interest on Equipment Costing Under \$10,000 and Drop Requirement for Government “Agreement” to Interest Costs

Depreciation

- Drop Requirements Related to “Large Research Facilities”
- Eliminate Requirement to Use Depreciation Recoveries to Acquire or Improve Research Facilities

Lobbying Costs

- Simplify Lobbying Cost Rules
- Put All Lobbying Cost Policies In A-21; Eliminate Multiple References to Other Documents
- Drop Separate Certification Requirement
- Combine Two Sections on Lobby Costs into One Section

Defense and Prosecution of Criminal and Civil Proceedings, Claims, Appeals

- Drop Lengthy, Complex Rules Currently in A-21; Substitute Streamlined Provisions in A-87
- Limit Restrictions to Defense Contracts as Required by Law, Consistent with A-87
- Allow Costs of Administrative Appeals

Other Rules Needing Simplification/Streamlining

- Advertising and Public Relations
- Professional Services Costs
- Recruitment Costs