

# Information Collection Activity Under OMB Review

**AGENCY:** Office of Management and Budget.

**ACTION:** Notice.

**SUMMARY:** In accordance with the Paperwork Reduction Act of 1980, as amended (44 U.S.C. 3501 et seq.), this notice announces that an information collection request has been submitted to the Office of Management and Budget's (OMB) Office of Information and Regulatory Affairs for processing under 5 CFR 1320.10. The information collection request is for the proposed information collection contained in the recent revision of Office of Management and Budget (OMB) Circular A-21, "Cost Principles for Educational Institutions," published in the *Federal Register* on May 8, 1996 (61 FR 20880). The first notice, as required by the Paperwork Reduction Act, was published in the *Federal Register* on May 30, 1996 (61 FR 27109).

The information collection request involves a submission of the Cost Accounting Standards Board's (CASB) Disclosure Statement (DS-2) by educational institutions receiving more than \$25 million in federally-sponsored agreements. Circular A-21's information collection requirement covers approximately 20 educational institutions not subject to CASB's regulatory requirement for filing the DS-2, pursuant to Public Law 100-679, which was previously approved and assigned OMB control number 0348-0055 (which expires August 31, 1997).

**FOR FURTHER INFORMATION:** For further information or a copy of the revision, contact Gilbert Tran, Office of Federal Financial Management, OMB (telephone: 202-395-3993).

**ADDRESS:** Written comments should be sent by [90 days from publication] to: Edward Springer, Office of Information and Regulatory Affairs, OMB, Room 10236, New Executive Office Building, Washington, DC 20503.

## **SUPPLEMENTARY INFORMATION**

Pursuant to the May 30, 1996, notice, OMB received one comment on this proposed information collection. The comment and OMB's response is summarized below.

The commenter stated that the OMB estimate of 120 hours for completing the Disclosure Statement (DS-2) is understated. Instead, the commenter estimated preparation time for the DS-2 to range from 200 hours to 2000 hours per affected institution.

OMB disagrees that the preparation of the DS-2 can take as much as 2000 hours to complete unless a university does not currently have adequate written cost accounting policies for Federal grants and contracts. The DS-2 is a 20-page document that provides a summary of an educational institution's cost accounting system for Federal grants and contracts. OMB's estimated time for the completion of DS-2 does not include the development of any cost accounting policies for Federal grants and contracts; instead, it reflects the effort by a university to document the existing cost policies at the institution. Furthermore, the cost accounting practices used for Federal grants and contracts should be already documented as required by Subpart C, Section \_\_\_\_\_.21, Standards for financial management systems, in OMB Circular A-110, "Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals and Other Non-Profit Organizations."

G. Edward DeSeve,  
Controller.

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