

“Areas of Review” being covered by the A-21 Task Force and the next steps as reported in late October by the tri-chairs of the Task Force

Details of the Task Force deliberations and/or draft recommendations were not shared other than to name the topics as follows.

Areas of Review (many overlap with the topics included in COGR’s 20 recommendations):

- Effort Reporting
- F&A rate setting process
- Federal Audit Coordination
- Subrecipient Monitoring
- Utility Cost Adjustment
- Agency or Program limitations on F&A reimbursement
- Cost sharing policy
- Direct vs Indirect charging of administrative costs and computing/communication devices

Other Agency/ Rules Areas

- Performance, Financial, and Invention Reporting
- Regulatory Implementation of Federal Requirements
- Differences Between Contracts and Grants Rules
- Researcher Training Requirements
- Requirements for DS-2 Disclosure Statements
- F&A Recovery for Subawards
- Requirements for Paper Records Retention
- Depository for F&A Rate Agreements
- Single Audit Threshold/Frequency

Other Specific Costs:

- Interest - (A-21 J.26)
- Depreciation - (A-21 F.2b & J.14)
- Publications and Printing – e.g., charges after grant ended
- Recruiting – e.g., visa costs
- Scholarships and Student Aid – revise and expand definition
- Contingency Funding – issue submitted by one of the federal agencies, conflict between A-21 J.11 which states contingency provisions are unallowable, and capital construction projects where contingency provisions are a normal component

OMB’s Gil Tran, one of the Task Force tri-chairs, reported the Task Force intends to have a single set of recommendations completed and submitted to the Research Business Models working group before the end of the calendar year. All recommendations will be review and subject to approval by senior leadership at OMB and Office of Science and Technology Policy (OSTP). A final public report of policy changes to A-21 (and related parallel efforts on A-87) is likely sometime in late January 2012.