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Federal - Preparer

>>> "Butler, Angela" <[Angela.Butler@ed.gov](mailto:Angela.Butler@ed.gov)> 6/19/2008 1:34 PM >>>

Attached is the Department of Education's comments/responses on the FASAB  
Exposure Draft.

>>> "Butler, Angela" <[Angela.Butler@ed.gov](mailto:Angela.Butler@ed.gov)> 6/25/2008 9:20 AM >>>

Terri

Danny Harris, Deputy CFO

Gary Wood, Director, Financial Management Operations

Thank you.

**Department of Education's Comments**  
**Exposure Draft: *Distinguishing Basic Information, Required Supplementary Information, and Other Accompanying Information***

**REQUEST FOR COMMENTS**

For instructions on submitting comments, please see page 9 of the exposure draft.

Q1. The Statement identifies a process and criteria to consider in deciding whether information should be considered basic information, required supplementary information or other accompanying information (See the section, Distinguishing Basic Information, RSI, and OAI, beginning on page 13 of the exposure draft).

- a. Do you agree with the process presented? If not, please explain your reasons.

The Department of Education (the Department) concurs with the process and criteria presented by the Board in the Exposure Draft (ED) for deciding whether information should be considered basic information, required supplementary information, or other accompanying information.

- b. Do you agree with the factors presented for distinguishing basic information from required supplementary information (See Table 1: Factors to Consider in Distinguishing Basic Information from RSI)?

The Department concurs with the factors presented in Table 1 for distinguishing basic information from required supplementary information and also believes they are very comprehensive.

- c. Are there additional factors that should be considered? If so, what are they, and how would you describe them?

The Department offers the following suggestion to the Board for its consideration:

Per OMB Circular No. A-136, revised as of June 29, 2007, the Statement of Financing "is presented as a note per OMB's authority under SFFAS 7 and will no longer be considered a Basic Statement." OMB refers to this note as the "Reconciliation of Net Cost of Operations to Budget." This remains the case under the recently revised OMB Circular No. A-136, dated June 3, 2008. As such, the Department suggests that consideration be given to changing references in the ED from "Statement of Financing" to "Reconciliation of Net Cost of Operations to Budget," where appropriate.