Question for Respondents due October 5, 2018

Please select the type(s) of organization responding to this exposure draft. If you are not responding on behalf of an organization, please select “individual.”

- Accounting Firm
- Federal Entity (user)
- Federal Entity (preparer)
- Federal Entity (auditor)
- Federal Entity (other) 
- Association/Industry Organization
- Nonprofit organization/Foundation
- Other
- Individual

If other, please specify:

Please provide your name.

Name: James Eun

Please identify your organization, if applicable.

Organization: Department of Homeland Security, Office of the Chief Financial Officer

Your responses should be sent to fasab@fasab.gov. If you are unable to respond by email, please fax your responses to 202-512-7366.

Q1. In light of the recently issued Statement of Federal Financial Accounting Standards (SFFAS) 55, Amending Inter-entity Cost Provisions, this TR rescinds TR 8, Clarification of Standards Relating to Inter-Entity Costs, because it is no longer consistent with SFFAS 4, Managerial Cost Accounting Standards and Concepts, as amended.

Do you agree or disagree with the rescission of TR 8? Please provide the rationale for your answer.

DHS Response: DHS agrees with the rescission of TR 8 because it is no longer consistent with SFFAS 4 and the rescission of TR 8 removes this area of misunderstanding relating to Inter-Entity Costs.