

From: Tucker, Gerald A

Sent: Tuesday, January 29, 2013 8:37 AM

To: FASAB

Subject: Deferral of the Transition to Basic Information for Long-Term Projections

Thank you for the opportunity to comment on the above topic. HUD has the following comment concerning question number one as noted below.

Q1. Do you agree or disagree with the proposed one-year deferral of the effective date for the transition of the statement presenting long-term fiscal projections for the U.S. government and related disclosures from required supplementary information (RSI) to basic information required in SFFAS 36, *Comprehensive Long-Term Projections for the U.S. Government*? The new effective date would provide for full implementation of SFFAS 36 for reporting periods beginning after September 30, 2013. Please explain the reasons for your position in as much detail as possible (see discussion in pars. A1 through A4).

HUD agrees with the Board's proposal for a one-year deferral of the effective date for the transition of the statement presenting long-term fiscal projections for the U.S. government and related disclosures from required supplementary information (RSI) to basic information required in SFFAS 36, *Comprehensive Long-Term Projections for the U.S. Government*. The long-term fiscal projections will help the reader to assess whether future budgetary resources are likely to be sufficient to sustain public services and this is an essential role for financial statements. The auditor's role in providing assurance regarding conformance to the standards is also essential. However, due to the uncertainty associated with the development of such guidance and the corresponding issuance date of such guidance, it is difficult to begin preparations to present and audit the sustainability information presented as a basic financial statement and related disclosures for FY 2013. Furthermore, due to the characteristics of the long-term projections and the inherent uncertainties there may be difficulties in developing guidance for providing assurance regarding such information therefore the one-year deferral request is reasonable.

Should you have any questions, please contact me.