



June 5, 2014

Memorandum

To: Members of the Board

From: Wendy M. Payne, Executive Director

Subj: Deferral of the Transition of Long-Term Projections to Basic – **Tab D<sup>1</sup>**

**MEETING OBJECTIVES**

- To consider response to the proposal to defer the FY 2014 transition to basic information for the statement of long-term fiscal projections
- To provide comments on the attached draft statement

**BRIEFING MATERIAL**

- Attachment 1 – Responses to the exposure draft
- Attachment 2 - Draft statement

**BACKGROUND**

At the April 2014 Board meeting, the Board acted on the Office of Management and Budget's request for a one-year deferral of the transition to basic for the statement of long-term fiscal projections. The exposure draft was issued April 30<sup>th</sup> and responses requested by June 2<sup>nd</sup>.

**DISCUSSION**

Eleven responses were received from both federal and non-federal sources. Two non-federal respondents opposed the deferral, eight federal and non-federal respondents supported the deferral, and one respondent indicated the organization has no comments. Please review the responses at Attachment 1.

At the Board meeting, members will be asked whether they continue to support the deferral. If the deferral is supported, we will consider the wording of the draft statement presented at Attachment 2 and proceed to the balloting process following the meeting.

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<sup>1</sup> The staff prepares Board meeting materials to facilitate discussion of issues at the Board meeting. This material is presented for discussion purposes only; it is not intended to reflect authoritative views of the FASAB or its staff. Official positions of the FASAB are determined only after extensive due process and deliberations.

If you have suggestions for improving the attached draft before the meeting, they are most welcome. Please contact me at 202.512.7357 or [paynew@fasab.gov](mailto:paynew@fasab.gov) with suggestions or questions.

## **Table of Contents**

### **DEFERRAL OF THE TRANSITION TO BASIC INFORMATION FOR LONG-TERM PROJECTIONS: Amending SFFAS 36 and SFFAS 45**

<b>Number</b>	<b>Respondent(s)</b>	<b>Affiliation</b>	<b>Page Number</b>
1	John Rutzler	Non-Federal	1
2	Eric Rivera	Nuclear Regulatory Commission	2
3	Carla Krabbe	Social Security Administration	3
4	Eric Berman	AGA Financial Management Standards Board	4
5	Lori Lee	Social Security Administration – Office of the Inspector General	6
6	Chris Bergin	HUD	7
7	Andrew Lewis	GWSCPA-FISC	8
8	Mark Easton	DoD	9
9	Carole Banks	Department of the Treasury	10
10	OPM	Office of Personnel Management	12
11	Shelia Weinberg	Truth in Accounting	13

**From:** jrutzler@yahoo.com [<mailto:jrutzler@yahoo.com>]

**Sent:** Friday, May 02, 2014 11:20 AM

**To:** FASAB

**Cc:** John Rutzler

**Subject:** Projections Delay

Just because auditors can not get their act together is no reason to delay presenting information in financial statement format which is more meaningful than supplementary information.

Sent from Windows Mail

**From:** Rivera, Eric [<mailto:Eric.Rivera@nrc.gov>]  
**Sent:** Monday, May 05, 2014 10:59 AM  
**To:** FASAB  
**Subject:** Exposure Draft - Deferral Of The Transition To Basic information For Long-Term Projections

This e-mail is on behalf of the Nuclear Regulatory Commission (NRC), Office of the Inspector General (OIG).

On April 30, 2014, FASAB solicited comments on the exposure draft titled *Deferral Of The Transition To Basic information For Long-Term Projections*. Specifically, the following question was asked in the exposure draft:

*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?*

NRC/OIG agrees with the proposed one-year deferral. Thank you for the opportunity to review the exposure draft.

Eric Rivera  
Team Leader  
Financial and Administrative Audits Team  
Office of the Inspector General  
U.S. Nuclear Regulatory Commission

**From:** Krabbe, Carla

**Sent:** Tuesday, May 20, 2014 8:31 AM

**To:** Payne, Wendolyn M

**Cc:** Goss, Stephen C.; Spencer, Pete; Gasparini, Joanne; Dushel, Annette; Brown, Terri D.

**Subject:** RE: Requesting Comments on Proposed Accounting Standards

Wendy -

Thank you for the opportunity to review and comment on the Exposure Draft entitled, "*Deferral of the Transition to Basic Information for Long-Term Projections*," that amends Statements of Federal Financial Accounting Standards 36 and 45. The Social Security Administration has no comments.

Carla Krabbe  
Deputy CFO  
Social Security Administration



*Advancing  
Government  
Accountability*

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PH 703.684.6931  
TF 800.AGA.7211  
FX 703.548.9367  
[www.agacgfm.org](http://www.agacgfm.org)

May 28, 2014

Ms. Wendy M. Payne  
Executive Director  
Federal Accounting Standards Advisory Board  
441 G Street, NW, Suite 6814  
Washington, DC 20548

Dear Ms. Payne:

On behalf of the Association of Government Accountants (AGA), the Financial Management Standards Board (FMSB) appreciates the opportunity to provide comments to the Federal Accounting Standards Advisory Board (FASAB) on its April 30, 2014 exposure draft entitled Deferral of the Transition to Basic Information for Long-Term Projections – Amending SFFASs 36 and 45. The FMSB is comprised of 25 members (list attached) with accounting and auditing backgrounds in federal, state and local government, as well as academia and public accounting. The FMSB reviews and responds to proposed standards and regulations of interest to AGA members. Local AGA chapters and individual members are also encouraged to comment separately.

This exposure draft proposes to provide a second one-year deferral of the transition of the statement presenting long-term fiscal projections and related disclosures from required supplementary information (RSI) to basic information. The FMSB agrees with the position of the FASAB as expressed in the exposure draft and supports the additional one year deferral. This will allow the AICPA to complete its consideration and issuance of revised guidance and allow the preparer time to prepare for the audit. Given the important nature of this matter, we agree that a one year deferral is warranted.

We appreciate the opportunity to comment on this document and would be pleased to discuss this letter with you at your convenience. A majority of the FMSB members approved of the issuance of this letter of comments. If there are any questions regarding the comments in this letter, please contact Steven E. Sossei, CPA, and AGA's staff liaison for the FMSB, at [ssossei@agacgfm.org](mailto:ssossei@agacgfm.org) or at (518) 522- 9968

Sincerely,

A handwritten signature in black ink, appearing to read "Eric Berman", with a long horizontal flourish extending to the right.

Eric S. Berman, CPA, Chair  
AGA Financial Management Standards Board

cc: Mary Peterman, CGFM, CPA - AGA National President

**Association of Government Accountants  
Financial Management Standards Board**

**July 2013 – June 2014**

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Sheila Weinberg

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Steven E. Sossei, Staff Liaison, AGA



**From:** Lee, Lori

**Sent:** Wednesday, May 28, 2014 1:00 PM

**To:** FASAB

**Cc:** Meehan, Mark; Vetter, Victoria; 'Rodriguez, Eveka'; 'Webb, Jamila, 'Luiz, Geoffrey

**Subject:** Comments on Deferral of the Statement of Long-Term Projections

Good afternoon,

The SSA OIG and our independent contractor for the financial statement audit for FY 2014, Grant Thornton, LLP, have reviewed the Exposure Draft: *Deferral of the Transition of Long-Term Projections to Basic Information*.

We have the following comment:

We agree with the Board that an additional one-year deferral of the transition of long-term financial projections from RSI to basic information is warranted. A one-year deferral will allow time for the AICPA to release final auditing guidance and the audit community time to interpret and apply the guidance.

Please let us know if you have any questions.

Thank you,

Lori

*Lori A. Lee*

*Auditor*

*Office of the Inspector General*

*Social Security Administration*

*6401 Security Boulevard*

*3-ME-2*

*Woodlawn, Maryland 21235*

**DEFERRAL OF THE TRANSITION TO BASIC INFORMATION FOR LONG-TERM PROJECTIONS****Amending SFFASs 36 and 45**

Please submit to [fasab@fasab.gov](mailto:fasab@fasab.gov)

**Name of Respondent:** **Contact:** Chris Bergin, OCFO-FPPD (202) 402-6374

**(Document was circulated for comment within HUD Finance Community and cleared by Director of OCFO-FPPD, ACFO-FM and Deputy CFO.)**

**Organization:** Housing and Urban Development

All responses are requested by June 2, 2014

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, 2014. Please explain the reasons for your position in as much detail as possible (see discussion in pars. A1 through A4).

**Response from Housing and Urban Development**

HUD agrees 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*.

As stated in Appendix B of the exposure draft, the audit considerations regarding RSI and basic information vary significantly. HUD agrees with the deferral to permit ample time for the audit community to complete its consideration of the need for revised guidance, and to allow the preparer to better plan for the audit.



## Greater Washington Society of CPAs and GWSCPA Educational Foundation

1111 19<sup>th</sup> Street, NW, Suite 1200 Washington, DC 20036  
202-464-6001 (v) 202-238-9604 (f) [www.gwscpa.org](http://www.gwscpa.org) [info@gwscpa.org](mailto:info@gwscpa.org)

June 2, 2014

Wendy Payne, Executive Director  
Federal Accounting Standards Advisory Board  
Mail Stop 6K17V  
441 G Street, NW – Suite 6814  
Washington, DC 20548

Dear Ms. Payne:

The Greater Washington Society of Certified Public Accountants (GWSCPA) Federal Issues and Standards Committee (FISC) appreciates the opportunity to provide comments on the Federal Accounting Standards Advisory Board's (FASAB) Exposure Draft (ED) on the proposed Statement of Federal Financial Accounting Standards (SFFAS), *Deferral of the Transition to Basic Information for Long-Term Projections: Amending SFFASs 36 and 45*.

The GWSCPA consists of approximately 3,300 members, and the FISC includes 27 GWSCPA members who are active in accounting and auditing in the Federal sector. This comment letter represents the consensus comments of our members. Our response to the ED question follows.

- 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, 2014. Please explain the reasons for your position in as much detail as possible (see discussion in pars. A1 through A4).
- A1. The FISC supports the Board's proposal to one-year deferral. The reasons specified by the Board in paragraphs A1 through A4 provide a reasonable basis to support the deferral.

\*\*\*\*\*

This comment letter was reviewed by the members of FISC, and represents the consensus views of our members.

Very truly yours,

Andrew C. Lewis  
FISC Chair



OFFICE OF THE UNDER SECRETARY OF DEFENSE  
1100 DEFENSE PENTAGON  
WASHINGTON, DC 20301-1100

COMPTROLLER

JUN 2 2014

Ms. Wendy M. Payne  
Executive Director  
Federal Accounting Standards Advisory Board  
441 G Street, NW, Suite 6814  
Mail Stop 6H19  
Washington, DC 20548

Dear Ms. Payne:

The Department of Defense (DoD) appreciates the opportunity to comment on the Federal Accounting Standards Advisory Board exposure draft, "Deferral of the Transition to Basic Information for Long-Term Projections." The DoD agrees with the proposed one-year deferral of the effective date for the transition of this statement. This deferral will allow the audit community to develop revised guidance to audit such information and will permit the preparer time to plan for the audit.

My contact is Ms. Maryla E. Engelking. She can be reached at 703-602-0155 or [maryla.e.engelking.civ@mail.mil](mailto:maryla.e.engelking.civ@mail.mil).

Sincerely,

A handwritten signature in dark ink, appearing to read "Mark E. Easton", is written over a horizontal line.

Mark E. Easton  
Deputy Chief Financial Officer



**DEPARTMENT OF THE TREASURY**  
**WASHINGTON, D.C. 20220**

**June 2, 2014**


Wendy M. Payne, Executive Director  
Federal Accounting Standards Advisory Board  
Mailstop 6K17V  
441 G Street, NW, Suite 6814  
Washington, DC 20548

Dear Ms. Payne:

Thank you for the opportunity to provide comments on the April 30, 2014 Exposure Draft (ED) titled "Deferral of the Transition to Basic Information for Long-Term Projections." Our comments, in response to the questions in the ED are attached.

Again, we appreciate the opportunity to comment on this Exposure Draft. If we can be of further assistance, please contact Marilyn Evans at (202) 622-0807.

Sincerely,



Carole Y. Banks  
Director, Financial Reports and Policy

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, 2014. Please explain the reasons for your position in as much detail as possible (see discussion in pars. A1 through A4).

Treasury agrees 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*. Our position of support for the deferral is based on the fact that without audit guidance for the statement, we are not able to properly and adequately prepare for the audit of this document.

***DEFERRAL OF THE TRANSITION TO BASIC INFORMATION FOR LONG-TERM PROJECTIONS******Amending SFFASs 36 and 45***

Please submit to [fasab@fasab.gov](mailto:fasab@fasab.gov)

**Name of Respondent:** U.S. Office of Personnel Management

**Organization:** Office of the Chief Financial Officer

All responses are requested by June 2, 2014

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, 2014. Please explain the reasons for your position in as much detail as possible (see discussion in pars. A1 through A4).

We agree 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*.

Deferral of the transition to basic information would provide an additional year for the American Institute of CPAs (AICPA) to develop guidance for audit reports on long-term fiscal projections. Since the AICPA is expected to develop such guidance in the coming months, we believe the deferral is prudent. As noted, the deferral also would provide the audit community additional time to complete its consideration of the need for revised guidance, and the preparer time to plan for the audit.

**From:** Sheila Weinberg  
**Sent:** Monday, June 02, 2014 5:50 PM  
**To:** FASAB  
**Subject:** Question for respondents - Deferral of LT Projections Stmt

Dear Wendy:

RE: Question regarding Deferral of the Transition to Basic Information for Long Term Projections.

Below is Truth in Accountings response to your question.

-----  
FASAB proposes to delay incorporating long-term projections in the basic information in the United States Government's financial statements. This proposal provides a stark and appropriate symbol of the federal government's lack of truthfulness and transparency when reporting critical financial information to its citizens.

To be knowledgeable participants in their federal government, citizens need factual, non-biased financial information. The implementation of this proposal would help provide such information. We understand implementation poses significant auditing challenges, but these challenges did not blossom overnight. The benefit of providing this information to the public outweighs these auditing challenges.

We urge the FASAB not to delay implementation. FASAB could and should be leading the charge to inspire relevant parties to get to the finish line -- sooner rather than later.

-----  
Please let me know if you have any questions or comments about this wording.

*Sheila*

Sheila A. Weinberg  
Founder & CEO  
Truth in Accounting  
847-835-5200  
(c) 847-344-3824



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Federal Accounting Standards Advisory Board

# DEFERRAL OF THE TRANSITION TO BASIC INFORMATION FOR LONG- TERM PROJECTIONS

Amending SFFASs 36 and 45

Statement of Federal Financial Accounting Standards **46**

ISSUE DATE

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¶  
Written comments are requested by June 2,  
2014¶

¶  
April 30, 2014¶

## THE FEDERAL ACCOUNTING STANDARDS ADVISORY BOARD

The Secretary of the Treasury, the Director of the Office of Management and Budget (OMB), and the Comptroller General, established the Federal Accounting Standards Advisory Board (FASAB or "the Board") in October 1990. FASAB is responsible for promulgating accounting standards for the United States Government. These standards are recognized as generally accepted accounting principles (GAAP) for the federal government.

An accounting standard is typically formulated initially as a proposal after considering the financial and budgetary information needs of citizens (including the news media, state and local legislators, analysts from private firms, academe, and elsewhere), Congress, federal executives, Federal program managers, and other users of federal financial information. The proposed standards are published in an Exposure Draft for public comment. In some cases, a discussion memorandum, invitation to comment, or preliminary views document may be issued before an exposure draft is released on a specific topic. A public hearing is sometimes held to receive oral comments in addition to written comments. The Board considers comments and decides whether to adopt the proposed standard with or without modification. After review by the three officials who sponsor FASAB, the Board publishes adopted standards in a Statement of Federal Financial Accounting Standards. The Board follows a similar process for Statements of Federal Financial Accounting Concepts, which guide the Board in developing accounting standards and formulating the framework for federal accounting and reporting.

Additional background information is available from the FASAB or its website:

- ["Memorandum of Understanding among the Government Accountability Office, the Department of the Treasury, and the Office of Management and Budget, on Federal Government Accounting Standards and a Federal Accounting Standards Advisory Board."](#)
- ["Mission Statement: Federal Accounting Standards Advisory Board"](#), [exposure drafts](#), [Statements of Federal Financial Accounting Standards and Concepts](#), [FASAB newsletters](#), and other items of interest are posted on FASAB's website at: [www.fasab.gov](http://www.fasab.gov).

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### Contact us:

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Washington, DC 20548  
Telephone 202-512-7350  
FAX – 202-512-7366 [www.fasab.gov](http://www.fasab.gov)

## SUMMARY

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This Statement provides a second one-year deferral of 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. Basic information is the information that is deemed essential for the financial statements and notes to be presented in conformity with generally accepted accounting principles (GAAP). RSI is information that a body that establishes GAAP requires to accompany basic information. While both categories of information are required, the auditor subjects the two categories of information to different procedures and complies with different reporting requirements under generally accepted government auditing standards (GAGAS).

This second deferral permits:

- the audit community to complete its consideration of the need for revised guidance, and
- the preparer time to plan for the audit.

During the deferral period, the consolidated financial report of the U. S. government will continue to report as RSI the information necessary for the reader to assess whether future budgetary resources will likely be sufficient to sustain public services and to meet obligations as they come due. Deferral of the transition to basic information provides an additional year for the American Institute of CPAs (AICPA) to develop guidance for audit reports on long-term fiscal projections.

## TABLE OF CONTENTS

---

Executive Summary .....	1
What is the Board proposing?.....	<b>Error! Bookmark not defined.</b>
How would this proposal improve federal financial reporting and contribute to meeting the federal financial reporting objectives?.....	1
Table of Contents .....	2
Question for Respondents .....	<b>Error! Bookmark not defined.</b>
Introduction.....	<u>3</u>
Purpose.....	<u>3</u>
Materiality.....	<u>3</u>
Proposed Standards.....	<u>5</u>
Scope.....	<u>5</u>
Amendments.....	<u>5</u>
Effective Date.....	<u>5</u>
Appendix A: Basis for Conclusions .....	<u>6</u>
Project History.....	<u>6</u>
Appendix B: Basic Information Compared to RSI .....	8
Appendix C: Abbreviations.....	12
Appendix D: Glossary.....	13

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## INTRODUCTION

### PURPOSE

1. This Statement amends the effective date of the phased implementation first established in Statement of Federal Financial Accounting Standards (SFFAS) 36, *Comprehensive Long-Term Projections for the U.S. Government* and later amended by SFFAS 45, *Deferral of the Transition to Basic Information for Long-Term Projections*. When fully implemented, SFFAS 36 requires a basic financial statement in the consolidated financial report of the U.S. Government (CFR), disclosures, and related required supplementary information (RSI). To allow a phased implementation, a three-year transition period was provided during which all information was RSI. The transition period was deferred one-year from the originally planned effective date of fiscal year (FY) 2013 to FY 2014.
2. SFFAS 36, as amended, requires information to be presented as follows in FY 2014:
  - a. The basic financial statement would present for all activities:
    - i. the present value of projected receipts and non-interest spending under current policy without change,
    - ii. the relationship of these amounts to projected Gross Domestic Product (GDP), and
    - iii. changes in the present value of projected receipts and non-interest spending from the prior year.
  - b. Disclosures would explain and illustrate:
    - i. the assumptions underlying the projections,
    - ii. factors influencing trends, and
    - iii. significant changes in the projections from period to period.
  - c. RSI would explain and illustrate the projected trends in:
    - i. the relationship between receipts and spending,
    - ii. deficits or surpluses,
    - iii. Treasury debt held by the public as a share of GDP,
    - iv. possible results using alternative scenarios, and
    - v. the likely impact of delaying corrective action when a fiscal gap exists.
3. This Statement amends the transition period provided in SFFAS 36, as amended, to allow one additional year – FY 2014 – during which all of the above information would be reported as RSI.

### MATERIALITY

4. The provisions of this Statement need not be applied to immaterial items. The determination of whether an item is material depends on the degree to which omitting or misstating

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information about the item makes it probable that the judgment of a reasonable person relying on the information would have been changed or influenced by the omission or the misstatement.

DRAFT

## STANDARDS

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### SCOPE

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5. This Statement applies to the consolidated financial report of the U.S. Government (CFR).
6. This Statement amends SFFAS 36, *Comprehensive Long-Term Projections for the U.S. Government*, and SFFAS 45, *Deferral of the Transition to Basic Information for Long-Term Projections*, to defer full implementation of its requirements by one year.

### AMENDMENTS

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7. SFFAS 45 is rescinded.
8. Par. 45 of SFFAS 36 is replaced by the following:
  45. The following phase-in of reporting requirements as basic information provides for full implementation for reporting periods beginning after September 30, 2014.
    - a. These standards are effective for periods beginning after September 30, 2009.
    - b. Information should be reported as RSI for the first five years of implementation (fiscal years 2010, 2011, 2012, 2013, and 2014).
    - c. Beginning in fiscal year 2015, the required information should be presented as specified in paragraphs 12 - 42.
    - d. Earlier implementation is encouraged.

### EFFECTIVE DATE

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9. The requirements of this Statement are effective upon issuance.

The provisions of this Statement need not be applied to immaterial items.

## APPENDIX A: BASIS FOR CONCLUSIONS

This appendix discusses some factors considered significant by Board members in reaching the conclusions in this Statement. It includes the reasons for accepting certain approaches and rejecting others. Individual members gave greater weight to some factors than to others. The standards enunciated in this Statement—not the material in this appendix—should govern the accounting for specific transactions, events, or conditions.

### PROJECT HISTORY

A1. Inclusion of audited long-term fiscal projections in U. S. federal government financial reports began in fiscal year 2006 with the statement of social insurance. A number of individual programs provide a statement of social insurance including Social Security and Medicare. In 2009, the Board issued SFFAS 36 and broadened requirements for long-term fiscal projections beyond these discrete social insurance programs. SFFAS 36 requires comprehensive projections for all government receipts and expenditures and the OMB prepares these projections.

A2. The Board recognized the uncertainty inherent in making the policy, economic, and demographic assumptions necessary for comprehensive projections. The standards, therefore, provide for the exercise of judgment in selecting assumptions and require information to aid the reader in understanding and considering uncertainty and alternative outcomes. The audit community has been considering the need to revise the audit guidance, including initial guidance developed for the statement of social insurance, to address such comprehensive projections.

A3. In 2012, the American Institute of CPAs (AICPA) Auditing Standards Board (ASB) organized the Prospective Information Task Force to consider the auditor's responsibility for prospective financial information. The Board provided a one-year deferral to allow time for the task force to develop guidance. The task force has been considering guidance for auditors and appropriate audit report language regarding the statement of long-term projections, the statement of social insurance, and the statement of changes in social insurance amounts. Final guidance is expected to be issued in 2014 or early 2015. Additional time will be needed for the preparer and the auditor to plan for the audit based upon the final guidance.

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A4. Therefore, the Board proposed an additional one-year deferral of the transition of long-term fiscal projections from RSI to basic information is warranted. The Board released an exposure draft (ED), entitled *Deferral of Transition to Basic Information for Long-Term Projections: Amending SFFASs 36 and 45*, on April 30, 2014, with comments requested by June 2, 2014.

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## RESPONSES TO THE PROPOSAL

A5. The Board received 11 responses to the exposure draft. Of these responses, four were from non-federal organizations or individuals, five from federal chief financial officer organizations, and two from federal offices of inspectors general. One respondent indicated the organization had no comment on the proposal. Two non-federal respondents objected to the proposal and the remaining respondents supported the proposal.

A6. The Board considered responses to the exposure draft at its June 25, 2014, public meeting. The Board did not rely on the number in favor of or opposed to a given position. Information about the respondents' majority view is provided only as a means of summarizing the comments. The Board considered the arguments in each response and weighed the merits of the points raised.

A7. Respondents opposed to deferring the transition to basic information noted the importance of the information to citizens as well as the time already provided for development of audit guidance. The Board considered the importance of the information when developing the proposal. In making its decision, the Board weighed the need for an appropriate audit framework and for time to plan for an audit under that framework against the effect of a one-year delay. Because the information has been and will continue to be provided as RSI, the Board decided to provide the deferral.

## BOARD APPROVAL

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## APPENDIX B: AUDIT CONSIDERATIONS REGARDING BASIC INFORMATION AND RSI

This summary table serves as an aid to the reader in understanding the implications of the proposed deferral. It is not complete as it does not present in detail the auditing standards established by the American Institute of CPAs.

	Basic Information	RSI
Is the information required to be in the federal financial report?		
Source: FASAB, Statement of Federal Financial Accounting Concepts (SFFAC) 2, Entity and Display, par. 73C and AICPA Auditing Standards as Clarified (AU-C) 730.04	Yes	Yes
Is the information deemed essential if the financial statements are to “present fairly” in conformity with GAAP?		
Source: FASAB SFFAC 2, par. 73B and 73C, and AICPA AU-C 730.04	Yes	No
What are the objectives of the auditor regarding basic information and RSI?	The purpose of an audit is to provide financial statement users with an opinion by the auditor on whether the financial statements are presented fairly, in all material respects, in accordance with an applicable financial reporting framework, which enhances the degree of confidence that intended users can place in the financial statements. ...As the basis for the auditor's opinion, GAAS require the auditor to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error. Reasonable assurance is a high, but not absolute, level of assurance. It is obtained when the auditor has obtained sufficient appropriate audit evidence to reduce audit risk (that is, the risk that the auditor expresses an inappropriate opinion	The objectives of the auditor when a designated accounting standard setter requires information to accompany an entity's basic financial statements are to perform specified procedures in order to  a. describe, in the auditor's report, whether required supplementary information is presented and  b. communicate therein when some or all of the required supplementary information has not been presented in accordance with guidelines established by a designated accounting

	<b>Basic Information</b>	<b>RSI</b>
	<p>when the financial statements are materially misstated) to an acceptably low level. Reasonable assurance is not an absolute level of assurance because there are inherent limitations of an audit that result in most of the audit evidence, on which the auditor draws conclusions and bases the auditor's opinion, being persuasive rather than conclusive.</p> <p>(AICPA, AU-C 200 .04 and 200.06)</p>	<p>standard setter or when the auditor has identified material modifications that should be made to the required supplementary information for it to be in accordance with guidelines established by the designated accounting standard setter.</p> <p>(AICPA, AU-C 730.03)</p>
What audit fieldwork is required?	Audit procedures in accordance with applicable auditing standards and requirements. <sup>1</sup>	Limited procedures pursuant to AU-C 730.05-.06.
What is to be provided in the auditor's report?	<p>When expressing an unmodified opinion on financial statements, the auditor's opinion should state that the financial statements present fairly, in all material respects, the financial position of the entity as of the balance sheet date and the results of its operations and its cash flows for the period then ended, in accordance with the applicable financial reporting framework. Also, the auditor's opinion should identify the applicable financial reporting framework and its origin.</p> <p>(AICPA AU-C Section 700.35 and .36)</p>	<p>Statement that the auditor has applied certain limited procedures and a statement that the auditor does not express an opinion or provide assurance on the information.</p> <p>(AICPA, AU-C 730-.08-.09)</p>
What audit report mention is required if the information is missing or not prepared in conformity with guidelines?	<p>Include a Basis for Modification Paragraph in the Report:</p> <p>If there is a material misstatement of the financial statements that relates to specific amounts in the financial statements (including quantitative disclosures), the auditor should include in the basis for modification paragraph a description and quantification of the financial effects of the misstatement, unless impracticable.</p>	<p>Include a statement that management has omitted the information and the information is required and is an essential part of financial reporting. Also, the auditor would state that the opinion on the basic financial statements is not affected by the missing information.</p> <p>(AICPA AU-C 730.08e)</p>

<sup>1</sup> The phrase "applicable auditing standards and requirements" is used to refer to auditing standards generally accepted in the United States of America; the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States; and Office of Management and Budget (OMB) Bulletin No. 07-04, *Audit Requirements for Federal Financial Statements*, as amended.

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Basic Information	RSI
<p>If it is not practicable to quantify the financial effects, the auditor should so state in the basis for modification paragraph.</p>	<p>In addition, if the measurement or presentation of the information departs materially from the prescribed guidelines, the auditor would state that although the opinion on the basic financial statements is not affected, material departures from the prescribed guidelines exist and the auditor would describe the departures.</p>
(AICPA AU-C 705.18)	
<p>If there is a material misstatement of the financial statements that relates to narrative disclosures, the auditor should include in the basis for modification paragraph an explanation of how the disclosures are misstated.</p>	
(AICPA AU-C 705.19)	(AICPA AU-C 730.08f)
<p>If there is a material misstatement of the financial statements that relates to the omission of information required to be presented or disclosed, the auditor should describe in the basis for modification paragraph the nature of the omitted information; and include the omitted information, provided that it is practicable to do so and the auditor has obtained sufficient appropriate audit evidence about the omitted information.</p>	
(AICPA AU-C 705.20)	
Modify the Auditor's Opinion:	
<p>A qualified opinion states that except for the effects of the matter(s) described in the basis for qualified opinion paragraph, the financial statements are presented fairly, in all material respects, in accordance with the applicable financial reporting framework.</p>	
(AICPA AU-C 705.24)	
<p>An adverse opinion states that the financial statements are not presented fairly in accordance with the applicable financial reporting framework.</p>	
(AICPA AU-C 705.25)	

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Source: The Federal Accounting Standards Advisory Board developed this summary but does not establish audit standards. For guidance regarding auditing standards, please refer to the source documents identified in the summary.

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## APPENDIX C: ABBREVIATIONS

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AICPA	American Institute of Certified Public Accountants
ASB	Auditing Standards Board
AU-C	Auditing Standards - Clarified
CFR	Consolidated financial report of the U.S. government
ED	Exposure draft
FASAB	Federal Accounting Standards Advisory Board
FY	Fiscal year
GAAP	Generally Accepted Accounting Principles
GAGAS	Generally Accepted Government Auditing Standards
GAO	Government Accountability Office
GDP	Gross Domestic Product
OMB	Office of Management and Budget
RSI	Required supplementary information
SFFAC	Statement of Federal Financial Accounting Concepts
SFFAS	Statement of Federal Financial Accounting Standards
U.S.	United States

## APPENDIX D: GLOSSARY

Basic Financial Statements	As used in SFFAS 7, <i>Accounting for Revenue and Other Financing Sources and Concepts for Reconciling Budgetary and Financial Accounting</i> , the basic financial statements are those on which an auditor would normally be engaged to express an opinion. The term “basic” does not necessarily mean that other financial information not covered by the auditor’s opinion is less important to users than that contained in the basic statements; it merely connotes the expected nature of the auditor’s review of, and association with, the information. The basic financial statements in financial reports prepared pursuant to the Chief Financial Officers Act, as amended, are called the “principal financial statements.” The Form and Content of these statements are determined by OMB. (see also Principal Financial Statements)
Basic Information	Information that is essential for financial statements and notes to be presented in conformity with generally accepted accounting principles (GAAP).
Required Supplementary Information	Information that a body that establishes GAAP requires to accompany basic information. When an auditor is engaged to audit an entity’s financial statements, basic information is subject to testing for fair presentation in conformity with GAAP. However, RSI for federal entities is unaudited but subject to certain procedures under Generally Accepted Government Auditing Standards for RSI.

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