February 6, 2009

Memorandum

To: Members of the Board

From: Eileen W. Parlow, Assistant Director

Through: Wendy M. Payne, Executive Director

Subj: ***Reporting Comprehensive Long-Term Fiscal Projections for the U.S. Government:*** **Comment Letters Received through February 4, 2009 – TAB B**[1]

MEETING OBJECTIVE

Members are asked to review comments received as well as staff analysis (see Tab D) and recommendations. At the meeting, members will identify any significant changes to be made to the proposal presented in the exposure draft. Specific issues for Board decisions are identified at Tab D.

BRIEFING MATERIAL

This memorandum provides the staff summary. The summary presents:

A. Tally of Responses by Question 5

B. Quick Table of Responses by Question 20

C. Overall Summary by Question 22

Attachment 1 provides the full text of Answers and Comments by Question and by Respondent and Other Comments from Respondents.

Attachment 2 provides the full text of the comment letters.

Staff analysis and recommendations are provided at Tab D.

[1] 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.

BACKGROUND

The ED proposed standards for reporting comprehensive long-term projections for the U.S. Government in the consolidated financial report of the federal government (CFR) via a basic financial statement and disclosures. This statement would be subject to a phased implementation as Required Supplementary Information for fiscal years 2010, 2011 and 2012, and as a basic financial statement and related disclosures beginning in fiscal year 2013.

SUMMARY OF OUTREACH EFFORTS

The exposure draft, *Reporting Comprehensive Long-Term Fiscal Projections for the U.S. Government*, was issued on September 5, 2008, with comments requested by January 5, 2009. Upon release of the exposure draft, notices and press releases were provided to:

a) The Federal Register;
b) *FASAB News;*
c) The *Journal of Accountancy, AGA Today, the CPA Journal, Government Executive, the CPA Letter,* and *Government Accounting and Auditing Update;*
d) The CFO Council, the Presidents Council on Integrity and Efficiency, Financial Statement Audit Network, and the Federal Financial Managers Council; and
e) Committees of professional associations generally commenting on exposure drafts in the past.

This broad announcement was followed by direct mailings of the exposure draft to:

a) Majority and minority staff directors of the following relevant congressional committees:
    Senate Committee on Appropriations
    Senate Committee on Budget
    Senate Committee on Finance
    Senate Committee Homeland Security and Governmental Affairs
    Senate Special Committee on Aging
    Senate Committee on Health, Education, Labor and Pensions
    Joint Committee on Taxation
    Joint Economic Committee
    House Committee on Appropriations
    House Committee on Budget
    House Committee on Oversight and Government Reform
    House Committee on Financial Services
    House Committee on Ways and Means

b) Public interest groups:
    - Over 300 think tanks listed in the *Think Tank Directory, 2006 Edition*
    - Government Watchdog Organizations:

Center for Responsive Politics
Citizens Union
Citizens for Responsibility and Ethics in Washington
Common Cause
Project on Government Oversight
Taxpayers for Common Sense
The Performance Institute

- Business Organizations:
  Alpha Beta Gamma
  Association for Business Communications
  Business Roundtable
  National Association of Corporate Directors
  National Association of Women Business Owners

c) Past respondents on similar issues:
Respondents to the FASAB document, *Preliminary Views- Accounting for Social Insurance, Revised*

d) Members of the Fiscal Sustainability Task Force

Members of Congress

The Honorable James Cooper, D-TN
The Honorable K. Michael Conaway, R-TX

Federal Government Participants

James Duggan, PhD, Senior Economic Advisor for Social Security, Office of Economic Policy, Department of the Treasury
Patrick Locke, Chief, Budget Analysis Branch, Office of Management and Budget
Robert B. Anderson, Senior Economist, Office of Management and Budget
Stephen Goss, Chief Actuary, Social Security Administration
Richard Foster, Chief Actuary, Centers for Medicare and Medicaid Services
Thomas McCool, PhD, Director, Center for Economics, Government Accountability Office
Benjamin R. Page, PhD, Principal Analyst, Macroeconomic Analysis Division, Congressional Budget Office

Non-Government Participants

Joseph Antos, PhD, Wilson H. Taylor Scholar in Health Care and Retirement Policy, American Enterprise Institute
Allen Schick, PhD, Visiting Fellow in Governance Studies, Brookings Institution
Jagadeesh Gokhale, PhD, Senior Fellow, Cato Institute
Robert Bixby, JD, Executive Director, Concord Coalition
Paul Posner, PhD, Director, Master's in Public Administration Program, George Mason University
Gary Kreps, PhD, Chair, Department of Communication, George Mason University

Sheila Weinberg, CEO and Founder, Institute for Truth in Accounting
C. Eugene Steuerle, PhD, Senior Fellow, Urban Institute

e) Academics from the Wharton School, the Brookings Institution, and George Mason University

To encourage responses, the following additional outreach actions were accomplished in December 2008:

- Reminder notices were provided on December 10, 2008, and January 5, 2009, to the FASAB Listserv.
- An article describing the project and requesting comments was published in the December 2008 edition of the AGA's Washington, DC Chapter newsletter, the *Washington Connection.*
- Mr. Allen and Ms. Payne encouraged responses during presentations.
- Ms. Parlow gave a 50-minute presentation on this project at a seminar sponsored by the AGA's Northern Virginia Chapter on December 15, 2008.

RESULT: Summary of Respondents

As of February 4, 2009, we have received 18 responses from the following sources:

	FEDERAL (Internal)	NON-FEDERAL (External)
Users, academics, others		11
Auditors	2	
Preparers and financial managers	5	

STAFF SUMMARY

Staff has summarized the responses to the questions. The staff's summary is intended to support your consideration of the comments and not to substitute for reading the individual letters. Staff analysis and recommendations regarding overarching issues identified in response to questions are presented at Tab D.
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A. Tally of Responses by Question

QUESTION	Yes/ AGREE	No/ DISAGREE	OTHER- SEE NARRATIVE	NO COMMENT
Q1 This exposure draft proposes reporting that would support FASAB Objective 3, Stewardship, and in particular, Sub-Objective 3B: Objective 3: Federal financial reporting should assist report users in assessing the impact on the country of the government's operations and investments for the period and how, as a result, the government's and the nation's financial condition has changed and may change in the future. Sub-Objective 3B: Federal financial reporting should provide information that helps the reader to determine whether future budgetary resources will likely be sufficient to sustain public services and to meet obligations as they come due. More detailed discussion of the reporting objective and the objectives of fiscal sustainability reporting can be found in paragraphs 1 through 8. Do you believe that the proposed reporting adequately supports the above objectives? Are there different reporting requirements that might better support the above objectives or that you believe should be added to the proposed requirements in this exposure draft? If so,	9	1	3	5

QUESTION	Yes/ AGREE	No/ DISAGREE	OTHER- SEE NARRATIVE	NO COMMENT
please explain.				
Q 2. In this proposed Statement, projections are prepared not to predict the future, but rather to depict results that may occur under various conditions. Accordingly, projections require assumptions to be made about the future. This exposure draft proposes broad and general guidance for selecting policy, economic, and demographic assumptions for long-term projections with a primary focus on the future implications of the continuation of current policy without change for federal government public services and taxation. The guidance begins at paragraph 19. Paragraph 28 explains that although current law is a reasonable starting point in selecting policy assumptions, a simple projection of "current law" would not always reflect current policy without change. Examples are provided. Do you believe that the guidance for assumptions is appropriate? If not, please suggest alternative guidance. Please provide the rationale for your response.	10	0	2	5

QUESTION	Yes/ AGREE	No/ DISAGREE	OTHER- SEE NARRATIVE	NO COMMENT
Q3. This exposure draft proposes a basic financial statement and disclosures. (Description begins at paragraph 35 and an illustrative example of the basic financial statement is provided in Appendix B.) The Board has indicated that the primary audiences for the consolidated financial report of the U.S. Government (CFR) are citizens and citizen intermediaries such as journalists and public policy analysts. Do you believe that the basic financial statement and disclosures would be understandable and meaningful for the primary audiences of the CFR? Please note any changes that you believe should be made to the proposed requirements for the basic financial statement and/or the disclosures.	7	3	2	6

QUESTION	Yes/ AGREE	No/ DISAGREE	OTHER- SEE NARRATIVE	NO COMMENT
Q4. The Board is proposing that the basic financial statement display the difference between projected revenue and projected spending, and that the fiscal gap (the change in non-interest spending and/or revenue that would be necessary to maintain public debt at or below a target percentage of gross domestic product (GDP)) must be reported either on the face of the basic financial statement or in a disclosure. Also, the fiscal gap may be reported for a specific debt level or over a range of debt levels (see paragraph 38). Both options for reporting fiscal gap are illustrated in Appendix B (see pages 51 (narrative on the face of the financial statement) and 61 (disclosure)). See paragraphs A60 - A63 in the Basis for Conclusions for an explanation of the pros and cons of the options. a. Do you agree with the flexible requirements for reporting fiscal gap?	4	4	2	7
b. Do you believe that the illustrative disclosure (Illustration 8 in Appendix B) is clear and understandable?	1	7	1	6

QUESTION	Yes/ AGREE	No/ DISAGREE	OTHER- SEE NARRATIVE	NO COMMENT
Q5. Finite and infinite time horizons for fiscal projections are discussed in the Basis for Conclusions, paragraphs A53 through A59. This exposure draft proposes the following requirements regarding time horizons for projections: (a) the projections presented in the basic financial statement should be "sufficient to illustrate long-term sustainability" (for example, traditionally the Social Security program has used a projection period of 75 years for long-term projections); (b) projections for both a finite and an infinite horizon should be provided, one in the basic financial statement and the other in the disclosures; and (c) either the basic financial statement or the disclosures should include projections for Social Security and Medicare based on the time horizon used for long-term projections for Social Security and Medicare in the Statement of Social Insurance (SOSI). a. Do you believe that the above requirements for time horizons are appropriate to meet the reporting objectives of Fiscal Sustainability Reporting? Specifically, do you believe that data for both finite and infinite horizon projection periods should be reported? If not, please explain.	3	10	0	4

QUESTION	Yes/ AGREE	No/ DISAGREE	OTHER- SEE NARRATIVE	NO COMMENT
b. Do you believe that there should be a specific time horizon requirement (for example, 75 years) for the basic financial statement for Fiscal Sustainability Reporting and/or the SOSI? If so, what time horizon do you believe should be required? (A response in the Yes column indicates disagreement with the Board's proposal)	10†	1	1	5
Q6 The Board's mission is to issue reporting requirements for the federal government's general purpose financial statements, and not to recommend budget policy. This exposure draft proposes a title for the basic financial statement: "Long-Term Fiscal Projections for the U.S. Government." An alternative title, "Statement of Fiscal Sustainability," might imply to some that the Board has established or plans to establish specific rules that define "fiscal sustainability" and/or budget rules that would result in fiscal sustainability. However, others have indicated that the "plain English" meaning of the words "fiscal" and "sustainability"			(a) 9 (b) 3 (c) 0 (d) 1	5

† Of the ten respondents who answered yes to question 5b, six recommended 75 years, one recommended 100 years, one recommended 12 years, and two did not specify a time horizon.

QUESTION	Yes/ AGREE	No/ DISAGREE	OTHER- SEE NARRATIVE	NO COMMENT
should be adequate, and that the title "Statement of Fiscal Sustainability" might be more appropriate. The Board's working definition of "fiscal sustainability" is explained in the Basis for Conclusions, paragraph A3. The concept of "Financial Condition" is explained in the Basis for Conclusions, paragraphs A7and A8. Which of the following do you believe that the basic financial statement should be titled? a. Long-Term Fiscal Projections for the U.S. Government b. Statement of Fiscal Sustainability c. Statement of Financial Condition d. A title not listed above (please specify) Please explain the reasons for your choice.				

QUESTION	Yes/ AGREE	No/ DISAGREE	OTHER- SEE NARRATIVE	NO COMMENT
Q7. This exposure draft proposes a minimum level of disaggregation for the basic financial statement. For projected receipts, major programs such as Medicare and Social Security would be shown separately from the rest of government. For projected spending, major programs such as Medicare, Social Security, and Medicaid would be shown separately from the rest of government. (See paragraphs 36 and A46 – A49.) a. Do you believe that the above general guidance provides for an appropriate level of disaggregation in the basic financial statement? Please explain the basis for your view.	7	1		9
b. Do you believe that specific line items (instead of or in addition to the "major programs" required by paragraph 36 of the ED) should be disaggregated in the basic financial statement? If so, please identify the line items and explain your reasoning.	5	4	1	8

QUESTION	Yes/ AGREE	No/ DISAGREE	OTHER- SEE NARRATIVE	NO COMMENT
Q8. This exposure draft proposes that disclosures should explain and illustrate the major factors impacting projected receipts and spending (such as the rising cost of health care) (see paragraph 42(a)). Illustrative examples in Appendix B begin on page 52. a. Do you believe that an explanation and illustration of the major factors impacting projected receipts and spending will be helpful to readers? Please explain the basis for your view and note any recommended changes in the requirements.	10	0	0	8
b. Do you believe that the display of a range for major cost drivers and/or major programs, as shown in Illustrations 1a and 1b in Appendix B should be optional or mandatory? Please explain the basis for your view.			Optional- 7 Mandatory- 2	9

QUESTION	Yes/ AGREE	No/ DISAGREE	OTHER- SEE NARRATIVE	NO COMMENT
Q9. This exposure draft proposes that the results of alternative scenarios be provided. Paragraph 42(d) provides that the present value of projected receipts, spending and the net of receipts and spending be presented for each alternative scenario. Optionally, projections for alternative scenarios may be displayed in a table format (see Illustration 7 in Appendix B). a. Do you believe that the proposed requirement for alternative scenarios is appropriate? Please explain the basis for your view.	6	5	1	5
b. Do you believe that the requirements for additional information regarding alternative scenarios are sufficient? If not, please explain the basis for your view and what additional information you propose.	5	5	0	7

QUESTION	Yes/ AGREE	No/ DISAGREE	OTHER- SEE NARRATIVE	NO COMMENT
Q 10. This exposure draft proposes disclosures consisting of narrative and graphic displays to effectively communicate to the reader historical and projected trends and to help the reader understand the major drivers influencing projected receipts and spending. The requirements begin at paragraph 39 and illustrations begin on page 52. a. Do you believe that the disclosures would help the reader understand the basic financial statement?	10	1	1	6
b. Are there any items that you believe should be added to, or deleted from, the disclosures? If so, please explain.	2	5	3	7
c. Do you believe that the final accounting standard should include an appendix that displays illustrative disclosures (see Appendix B)? Why or why not?	10	0	0	8
Q11 The Frequently Asked Questions (FAQs) at Appendix C provide a “plain English” explanation of terms and concepts used in long-term projections. a. Do you find the FAQs helpful?	10	0	0	8

QUESTION	Yes/ AGREE	No/ DISAGREE	OTHER- SEE NARRATIVE	NO COMMENT
b. Should the Treasury Department be encouraged to include any of the FAQs in the CFR to promote understandability of the terms and concepts? If so, please specify the FAQs that should be considered for inclusion (and/or exclusion).	5	3	1	9
Q12 Effective Date and Phased Implementation: This proposed Statement would be effective for periods beginning after September 30, 2009 with earlier implementation encouraged. This proposed Statement would require that the financial statement and the disclosures be included in Required Supplementary Information (RSI) for the first three years of implementation, and basic information (for example, basic financial statement and disclosures) for all subsequent years. a. Do you believe that this implementation date is reasonable and appropriate?	5	7	1	5
b. Do you agree with the phased implementation period (3 years)?	6	4	0	8

QUESTION	Yes/ AGREE	No/ DISAGREE	OTHER- SEE NARRATIVE	NO COMMENT
c. Do you believe that some or all of the required information should remain as RSI after the 3-year implementation period? If so, please explain the basis for your view. (Agree indicates that the information should become basic information)	4	6	1	7
Q13 A significant minority of members supported a proposal that there should be RSI regarding trends in the proportion of U.S. Treasury debt held by foreign investors. This information would remain as RSI and would not be subject to the phased-in implementation in paragraph 44. (See paragraphs A64 –A68 in the Basis for Conclusions for a discussion of this proposal and Illustration 10 in Appendix B.) a. Do you believe that including RSI regarding the foreign holdings of U.S. Treasury debt would be relevant and useful in meeting the objectives of fiscal sustainability reporting? Please explain why or why not.	7	3	1	7
b. Do you believe that the illustrative example provided in Appendix B is clear and understandable?	10	0	1	7

QUESTION	Yes/ AGREE	No/ DISAGREE	OTHER- SEE NARRATIVE	NO COMMENT
Q14 A minority of members supported a proposal that if the proposed Comprehensive Long-Term Fiscal Projections for the U.S. Government indicate a significant fiscal gap, RSI (not subject to the phased-in implementation in paragraph44) should include the identification, explanation, and fiscal impact of one or more policy alternatives that would reduce the fiscal gap. (See paragraphs A68–A74 in the Basis for Conclusions for a discussion of this proposal.) Do you believe that if the proposed Comprehensive Long-Term Fiscal Projections for the U.S. Government indicate a significant fiscal gap, the statement and disclosures be accompanied by RSI that includes identification, explanation, and fiscal impact of one or more policy alternatives that would reduce the fiscal gap? Please explain why or why not.	2	10	0	5

QUESTION	Yes/ AGREE	No/ DISAGREE	OTHER- SEE NARRATIVE	NO COMMENT
Q15 This exposure draft proposes that additional information that may be helpful to readers in assessing whether financial burdens without associated benefits were passed on by current-year taxpayers to future-year taxpayers (sometimes referred to as "inter-period equity" or "inter-generational equity") be included as one way to meet a disclosure requirement for providing context for the data in paragraph 41(e) (See paragraphs A75—A78 in the Basis for Conclusions for a discussion of this proposal.) a. Do you believe that such information should be optional (as proposed in the exposure draft) or required? (A response of Yes = Optional, No = Mandatory)	5	4	3	6
b. Do you believe that further research and analysis should be performed by FASAB to improve the disclosure of such information? Please explain the basis for your views and note any recommended changes for the presentation of inter-period or inter-generational equity.	4	6	1	7

B. Quick Table of Responses by Question

Key to Respondents

	Name	Organization	Category
1	Barry Anderson	Organisation for Economic Co-operation and Development (OECD)	Non-federal Other
2	James K. Galbraith, L. Randall Wray and Warren Mosler	University of Texas at Austin; University of Missouri - Kansas City; University of Cambridge	Non-federal Other
3	Adrienne Cheasty	International Monetary Fund (IMF)	Non-federal Other
4	Steven Schaeffer	Social Security Administration (SSA) Office of the Inspector General (OIG)	Federal Auditor
5	Robert L. Childree	Association of Government Accountants (AGA) Financial Management Standards Board (FMSB)	Non-Federal Other
6	Melanie Cenci	U.S. Department of Agriculture (USDA)	Federal Preparer
7	Mary Glenn-Croft	SSA Office of the Chief Financial Officer (OCFO)	Federal Preparer
8	Rebecca Hendrick	American Society for Public Administration's Association for Budget and Financial Management	Non-federal Other
9	James M. Dubinsky	Association for Business Communication	Non-federal Other
10	David M. Walker	Peter G. Peterson Foundation.	Non-federal Other
11	Shaun McNamara	U.S. Department of Transportation	Federal Preparer
12	Stephen C. Goss and Karen P. Glenn	SSA - Office of the Chief Actuary	Federal Preparer
13	Dan Kovlak	Greater Washington Society of CPAs	Non-federal Other
14	Dick Bode	Individual	Non-federal Other
15	Daniel L. Fletcher	CFO Council, Standardization Committee	Federal Preparer
16	McCoy Williams	Government Accountability Office	Federal Auditor
17	John Favret	Individual	Non-federal Other
18	Joseph DioGuardi	Individual	Non-federal Other

Responses by Question

	1	2	3	4 a	4 b	5 a	5b	6	7 a	7 b	8 a	8 b	9 a	9 b	10 a	10 b	10 c	11 a	11 b	12 a	12 b	12 c	13 a	13 b	14	15 a	15 b
1		*				N	Y 75	a																	N	O	N
2	N	Y	N	Y	N	Y	Y	d					N	N	N			Y		N		*	N		N	O	N
3	Y					Y				Y			Y												N		
4	Y	Y	N	Y	N	N	Y 75	a	Y	*	Y	O	N	N	Y	N	Y	Y	*	N	N	Y	Y	Y	N	O	N
5	Y	Y	*	N	N	N	Y 100	a	Y	N	Y	O	N	N	*	*	Y	Y	Y	Y	Y	N	Y	Y	Y	*	*
6	Y	Y	Y	Y	Y	N	Y 75	a	Y	N	Y	O	N	N	Y	*	Y	Y	Y	Y	Y	Y	Y	Y	N	*	Y
7	*	Y	Y	N	N	N	Y 75	a	Y	Y	Y	O	Y	Y	Y	N	Y	Y	N	Y	N	Y		Y	N	O	N
8	Y	Y											Y										Y				
9															Y	N	Y										
10	Y	Y	Y		N	N	Y 75	d		Y	Y		*		Y	Y		Y	Y	N	Y	N	Y	Y	N	R	
11																				*							
12	*	*	Y	*	N	N	Y 75	a	Y	N	Y	O	Y	Y	Y	Y	Y	Y	Y	N	N	Y	N	Y	N	*	N
13	*	Y	Y	N	N	N	Y	b	Y	N	Y	O	N	N	Y	*	Y	Y	Y	Y	Y	N	*	Y	Y	R	Y
14																				N					Y		
15	Y	Y	Y	*	*	N	*	a	N	Y	Y	R	Y	Y	Y	N	Y	Y	Y	N	Y	Y	Y	*	N	O	N
16	Y	Y	Y	Y		Y	N	b	Y		Y	O	Y		Y	N	Y		N	Y	Y	Y	N	Y	N	R	Y
17			N	N		N	Y 12	a																			
18	Y		*					b		Y	Y	R			Y		Y	Y	Y	N	N	N	Y*	Y		R	Y

Legend:
Y Yes
N No
* Narrative response – See summary of responses by question.
Q6: Report Title: (a) “Long-Term Projections for the U.S. Government” (b) “Statement of Fiscal Sustainability” (d) Other
Q8b & Q15: O Optional R Required)

C. Overall Summary by Question

Note: The denominator for each topic is the number of respondents answering the related question with a yes or no. The denominator excludes those not addressing the topic or whose response was not a clear yes or no. Staff exercised judgment in determining whether a clear yes or no answer was provided.

Q1 A majority of respondents (9 of 10) **agree** that the Board's proposal adequately supports the reporting objective.

Q2 A majority of respondents (10 of 10) **agree** with the Board's proposal to provide broad and general guidance for assumptions. [See Tab D, Issues A7 and A8]

Q3 A majority of respondents (7 of 10) **agree** that the basic financial statement and disclosures would be understandable and meaningful for the primary audiences of the CFR. [See Tab D, Issues A7 and A8]

Q4a Half of the respondents (4 of 8) **agree** with the Board's proposal for flexible requirements for reporting fiscal gap. [See Tab D, Issue A5]

Q4b A majority of respondents (7 of 8) **disagree** that the illustrative disclosure for fiscal gap (Illustration 8 in Appendix B) is clear and understandable. [See Tab D, Issue A5]

Q5a A majority of respondents (10 of 13) **disagree** with the Board's proposal to require reporting projected data for both finite and infinite time horizons. [See Tab D, Issue A2]

Q5b A majority of respondents (10 of 11) **disagree** with the Board's proposal not to specify a time horizon for projected data. (6 of the 9 recommended a time horizon of 75 years). [See Tab D, Issue A2]

Q6 A majority of respondents (9 of 13) **agree** with the Board's proposal to title the basic financial statement "Long-Term Fiscal Projections for the U.S. Government."

Q7a A majority of respondents (7 of 8) **agree** that the Board's general guidance on the level of disaggregation of major programs in the basic financial statement is appropriate. [See Tab D, Issue A4]

Q7b A majority of respondents (5 of 9) agree with the Board's proposed requirement for disaggregating major programs and did not suggest additional line items. However, several of respondents (4 of 9) **disagree** with the illustrative example financial statement in that it seems to imply that the only major programs are social insurance programs, and they provided suggestions for additional line items for major programs that could be disaggregated. [See Tab D, Issue A4]

Q8a A majority of respondents (10 of 10) **agree** that an explanation and illustration of the major factors impacting projected receipts and spending will be helpful to readers.

Q8b A majority of respondents (7 of 9) **agree** that the display of a range for major cost drivers and/or major programs should be optional.

Q9a Half of the respondents (6 of 11) **disagree** that the proposed requirement for alternative scenarios is appropriate. [See Tab D, Issue A3]

Q9b Half of the respondents (5 of 10) **disagree** that the requirements for additional information regarding alternative scenarios is sufficient. [See Tab D, Issue A3]

Q10a A majority of respondents (10 of 11) **agree** that the disclosures would help the reader understand the basic financial statement.

Q10b A majority of respondents (5 of 7) **agree** that there are no items that should be added to or deleted from the disclosure requirements.

Q10c A majority of respondents (10 of 10) **agree** that the final accounting standard should include an appendix that displays illustrative disclosures.

Q11a A majority of respondents (10 of 10) **agree** that the FAQs were helpful. [See Tab D, Issue A6]

Q11b A majority of respondents (5 of 8) **disagree** with the Board's proposal being silent on whether the FAQs should be included in the CFR, and believe that the Treasury Department should be encouraged to include the FAQs in the CFR. One respondent believes that the FAQs should be in GAO's *Guide to Understanding the Annual Financial Report of the U.S.*

Government rather than the CFR. [See Tab D, Issue A6]

Q12a A majority of the respondents (7 of 12) **disagree** with the Board's proposed implementation date. [See Tab D, Issue A1]

Q12b A majority of respondents (6 of 10) **agree** with the Board's proposed phased implementation period of 3 years.

Q12c A majority of respondents (6 of 10) **disagree** with the Board's proposal to make all of the data basic information after the 3-year phased implementation period and believe that some or all of the information should remain as RSI. [See Tab D, Issue A1]

Q13a A majority of respondents (7 of 10) **disagree** with the Board's majority proposal not to require reporting information about foreign holdings of U.S. Treasury debt. [See Tab D, Issue B1]

Q13b A majority of respondents (10 of 10) **agree** that the illustrative example provided for reporting information about foreign holdings of U.S. Treasury debt is clear and understandable. [See Tab D, Issue B1]

Q14 A majority of respondents (10 of 12) **agree** with the Board's majority proposal <u>not</u> to require the identification, explanation, and or fiscal impact of one or more policy alternatives. [See Tab D, Issue B2]

Q15a A majority of respondents (5 of 9) **agree** that additional information about inter-generations equity should be optional, as proposed in the ED. [See Tab D, Issue B3]

Q15b A majority of respondents (6 of 10) **agree** with the Board's tentative decision that at this time FASAB should <u>not</u> perform further research and analysis to improve the disclosure of inter-period or inter-generational equity. [See Tab D, Issue B3]