



#10 - Greater Washington Society of CPAs (GWSCPA)

March 12, 2026

Ms. Monica R. Valentine
Executive Director
Federal Accounting Standards Advisory Board
441 G Street, NW, Suite 1155
Washington, DC 20548

Dear Ms. Valentine:

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 (FASAB or “the Board”) Staff Implementation Guidance 64.1 Exposure Draft (ED) titled *Guidance for Implementing SFFAS 64: Management’s Discussion and Analysis (MD&A)*.

The GWSCPA consists of approximately 3,600 members, and the FISC includes GWSCPA members who are active in financial management, accounting, and auditing in the Federal sector. We sincerely appreciate the opportunity to share our views.

We support the Board’s efforts to provide this implementation guidance to assist Federal reporting entities in preparing MD&A information that meets the requirements of Statement of Federal Financial Accounting Standards 64, *Management’s Discussion and Analysis (SFFAS 64)* and the needs of the Federal financial reports’ users. The FISC provides the following recommendations:

- The objective of the information presented in paragraphs 1-5 is to provide preparers with guidance on what the term “significant” means when presenting information in the MD&A. Although paragraph 5 provides an example of an impaired asset, the information included does not provide example criteria applied in this scenario that led management to discuss the impaired asset in the MD&A. For example, does the building have particular importance to the reporting entity’s financial statements or operation? The FISC recommends that the Board staff revise these paragraphs to provide example criteria, both quantitative and qualitative, that preparers would consider when determining whether the event is significant and should be disclosed in the MD&A.
- While the implementation guidance provides the preparers of Federal financial reports with additional information to support the implementation of SFFAS 64, the majority of the information provided is a repeat of the requirements and discussions in SFFAS 64 and does not provide specific examples to assist preparers with the application of such requirements. For example, in providing guidance on how reporting entities can achieve an integrated MD&A, paragraphs 17-22 are repeating most of the contents in paragraphs 10, 12, and 13 of SFFAS 64. The FISC recommends that the Board staff revise the implementation guidance to provide specific examples beyond what is in SFFAS 64. For example, in providing guidance on how an integrated MD&A can be achieved when addressing the operating performance of a reporting entity’s significant program, the guidance can include example narrative of MD&A discussion section or elements

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that incorporate both nonfinancial performance information, including program's activities and outcome, and the program's financial results.

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

Very truly yours,

Sherif R. Ettfa
FISC Chair