



## Federal Accounting Standards Advisory Board

**November 26, 2019**

### Memorandum

To: Members of the Board  
From: Grace Wu, Assistant Director  
Through: Monica R. Valentine, Executive Director  
Subject: Materiality<sup>1</sup> – Tab C

#### MEMBER ACTIONS REQUESTED:

- Please contact staff by December 10<sup>th</sup>, 2019 with any questions on the ballot draft.

### MEEETING OBJECTIVE

The meeting objective is to review and approve the ballot Statement of Concepts: *Materiality*.

### BRIEFING MATERIAL

You may electronically access all of the briefing material at <https://fasab.gov/board-activities/briefing-materials/>.

The briefing materials include this memorandum and the following attachments:

- Attachment 1: Ballot Draft – Statement of Concepts: *Materiality* - **Marked**
- Attachment 2: Ballot Draft – Statement of Concepts: *Materiality*– **Clean**
- Attachment 3: Ballot for Statement of Concepts: *Materiality*

### BACKGROUND

At the October 24, 2019 Board meeting, the Board agreed to proceed to a pre-ballot draft of the Materiality concepts statement prior to the December Board meeting and a ballot draft at the December 2019 meeting. On November 1, 2019, a pre-ballot Statement based on the October Board meeting discussion was provided for members' review and comments.

Based on comments from members on the pre-ballot draft, staff prepared a ballot Concepts Statement *Materiality* at Attachment 1 and Attachment 2. The major changes from the pre-ballot draft are as follows:

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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 FASAB or its staff. Official positions of FASAB are determined only after extensive due process and deliberations.

- Original paragraphs A7 with A6 were combined to avoid the repetitive discussion of how the needs of the federal government report user generally differ from those of the commercial entity financial report user.
- Original paragraph A12 was separated into two paragraphs to clarify the different discussions.
- Paragraph A4 was modified to align to the Summary section.

Staff's goal is to discuss this ballot draft at the December 2019 meeting to gain Board approval. Members who plan to submit a dissent should provide it to staff as soon as possible so that other Board members may consider these views during their review.

## **QUESTIONS FOR THE BOARD**

Does the Board approve the Statement of Concepts: *Materiality*?

## **NEXT STEPS**

Following an affirmative vote by at least a two-thirds majority of the members, the SFFAC will be submitted to the Secretary of the Treasury, the Director of OMB, and the Comptroller General for the 90-day Sponsor review. If, within 90 days after its submission, neither the Director of OMB nor the Comptroller General objects to the Statement of Concepts: *Materiality*, then it will be released as final, announced in the Federal Register, and published by FASAB.

## **MEMBER FEEDBACK**

If you have any questions or comments prior to the meeting, please contact me by telephone at (202) 512-7377 or by e-mail at [wug@fasab.gov](mailto:wug@fasab.gov) with a cc to [ValentineM@fasab.gov](mailto:ValentineM@fasab.gov).



Federal Accounting Standards Advisory Board

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## MATERIALITY:

AMENDING STATEMENT OF FEDERAL FINANCIAL ACCOUNTING CONCEPTS  
(SFFAC) 1, *OBJECTIVES OF FEDERAL FINANCIAL REPORTING*, AND SFFAC  
3, *MANAGEMENT'S DISCUSSION AND ANALYSIS*

### Statement of Federal Financial Accounting Concepts 9

XXXX, 2020

**BALLOT DRAFT**  
**November 26, 2019**  
**MARKED VERSION**

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## 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 of the United States 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.

Accounting standards are 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 for comment, or preliminary views document may be published before an exposure draft is published 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 standards 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 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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## PREAMBLE TO STATEMENTS OF FEDERAL FINANCIAL ACCOUNTING CONCEPTS

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This Statement of Federal Financial Accounting Concepts (SFFAC) is the ninth in a series of concepts statements intended to set forth objectives and fundamentals on which financial accounting and reporting standards will be based. The objectives identify the goals and purposes of financial reporting. The fundamentals are the underlying concepts of financial accounting-concepts that guide the selection of transactions, events, and circumstances to be accounted for; their recognition and measurement; and the means of summarizing and communicating them to interested parties.

The Federal Accounting Standards Advisory Board's (FASAB or "the Board") conceptual framework enhances the consistency of standards and serves the public interest by providing structure and direction to federal financial accounting and reporting. The most direct beneficiaries of the FASAB's concepts statements are the Board itself and preparers and auditors of federal financial reports. The statements guide the Board's development of accounting and reporting standards by providing the Board with a common foundation and basic reasoning on which to consider the merits of alternatives.

Knowledge of the objectives and concepts the Board considers should help users and others who are affected by or interested in federal financial accounting and reporting standards to understand better the purposes, content, and qualitative characteristics of information provided by federal financial accounting and reporting. That knowledge should enhance the usefulness of, and confidence in, federal financial accounting and reporting.

Concepts statements enhance preparers' and auditors' understanding of the common foundation and reasoning employed in considering alternatives. The GAAP hierarchy provides that statements of federal financial accounting standards constitute level A (the highest level) guidance. Statements of federal financial accounting concepts are not GAAP. Instead, concepts statements constitute "other literature" and may only be relied upon by financial statement preparers and auditors to resolve specific accounting issues in the absence of GAAP literature. In developing and amending accounting standards, the Board looks to concepts statements for guiding principles and also considers relevant existing standards and guidance issued by the Board and other standard setting bodies. Until the Board amends existing standards, the Board expects practice to be governed by the accounting principles embodied in the four levels of the GAAP hierarchy. Thus, the Board distinguishes between material presented in concepts which are used to guide Board deliberations on future GAAP and accounting principles presented in standards which constitute current GAAP.

For federal entities, in the absence of specific authoritative literature applicable to a transaction or event, it should be possible to report the event or transaction by selecting an established accounting principle for an analogous transaction or event that appears appropriate when applied in a similar manner. In the unusual case where an analogy cannot be drawn to established authoritative literature, the GAAP hierarchy permits consideration of other literature including concepts statements. Consideration of individual concepts statements will be helpful but often may not provide sufficient guidance in resolving emerging issues. Therefore, the Board encourages careful study of the conceptual framework and established practice in resolving such issues.

Statements in this series describe concepts and relations that will underlie future federal financial accounting standards and practices and in due course will serve as a basis for evaluating existing standards and practices. With issuance of this statement, the series of concepts statements comprises:

- SFFAC 1, *Objectives of Federal Financial Reporting (includes the qualitative characteristics of information in financial reports)*
- SFFAC 2, *Entity and Display*
- SFFAC 3, *Management's Discussion and Analysis*
- SFFAC 4, *Intended Audience and Qualitative Characteristics for the Consolidated Financial Report of the United States Government*
- SFFAC 5, *Elements of Accrual-Basis Financial Statements and Basic Recognition Criteria*
- SFFAC 6, *Distinguishing Basic Information, Required Supplementary Information, and Other Accompanying Information*
- SFFAC 7, *Measurement of the Elements of Accrual-Basis Financial Statements in Periods After Initial Recording*
- SFFAC 8, *Federal Financial Reporting*

Like other pronouncements of the FASAB, Statements of Federal Financial Accounting Concepts remain in effect until amended, superseded, or withdrawn by appropriate action under the Board's Rules of Procedure.

## SUMMARY

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This Statement of Federal Financial Accounting Concepts (Statement or SFFAC) updates concepts related to the application of materiality in the federal financial reporting environment. Through amendments to SFFAC 1, *Objectives of Federal Financial Reporting*, and SFFAC 3, *Management's Discussion and Analysis*, this SFFAC clarifies implementation of materiality concepts in the issuance of federal financial statements.

A reporting entity considers materiality in the application of specific requirements to information contained in its general purpose federal financial reports. This Statement clarifies the materiality guidance. It defines the users, scope, and factors to consider when applying materiality in the federal environment. This Statement will also enhance preparers' and auditors' understanding of the materiality concepts in federal financial reporting.

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## CONCEPTS

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### AMENDMENTS TO SFFAC 1, *OBJECTIVES OF FEDERAL FINANCIAL REPORTING*

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1. This paragraph amends Statement of Federal Financial Accounting Concepts (Statement or SFFAC) 1, *Objectives of Federal Financial Reporting*, by inserting a chapter titled *Materiality* between the current chapter 6: *Qualitative Characteristics of Information in Financial Reports* and chapter 7: *How Accounting Supports Federal Financial Reporting*. The new *Materiality* chapter is as follows:<sup>1</sup>

- 164a. A reporting entity considers materiality in the application of accounting and reporting requirements. The Federal Accounting Standards Advisory Board (FASAB or “the Board”) intends that information presented in accordance with generally accepted accounting principles (GAAP)<sup>12.1</sup> will not contain misstatements, including omissions of information, considered material. Such omissions include information that is necessary for a reasonable financial report user (reasonable user)<sup>2</sup> to understand the effect of particular material transactions, other events, and conditions on the entity’s financial statements, notes to the financial statements, and required supplementary information.<sup>3</sup>

Footnote (FN) 12.1 Such information would include financial statements, notes to the financial statements, and required supplementary information.

- 164b. A misstatement, including omission of information, is material if, in light of surrounding facts and circumstances, it could reasonably be expected that the judgment of a reasonable user relying on the information would change or be influenced by the correction or inclusion of the information.
- 164c. Materiality should be evaluated in the context of the specific reporting entity. Determining materiality requires appropriate and reasonable judgment in considering the specific facts, circumstances, size, and nature of the misstatement. Consequently, after quantitative and qualitative factors are considered, materiality may vary by financial statement, line item, or group of line items within an entity.
- 164d. Misstatements should be considered individually and in the aggregate. Materiality determinations regarding such misstatements should include consideration of both qualitative and quantitative factors. Information that is not considered quantitatively material may be considered qualitatively material if it can reasonably be expected to change or influence the judgment of a reasonable user. Qualitative

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<sup>1</sup> The inserted chapter will become chapter 7: *Materiality* and the existing chapters following chapter 6 in SFFAC 1 will be renumbered to accommodate the insertion.

<sup>2</sup> A reasonable financial report user has appropriate knowledge of the federal government’s activities and reviews and analyzes the information diligently.

<sup>3</sup> Statement of Federal Financial Accounting Standards 57, *Omnibus Amendments 2019*, eliminates required supplementary stewardship information (RSSI) in the general purpose federal financial report.

considerations include the public accountability<sup>4</sup> of the reporting entity; applicable legal and regulatory requirements; the visibility and sensitivity of government programs, activities, and functions; as well as other factors that may affect a reasonable user's judgment about the information.

- 164e. Materiality concepts and related factors should be considered when making materiality judgments. While specific qualitative and quantitative thresholds for materiality are not provided in this Statement, illustrative factors are discussed in paragraphs 164c and 164d .
- 164f. In applying materiality concepts, the specific needs of a reasonable user should be considered. In the federal government environment, such needs generally differ from those of the commercial entity financial report user. For example, due to the visibility and sensitivity of government programs, the needs of federal government financial report users extend to having the ability to assess the allocation and use of resources in the federal government. Compliance with laws, regulations, contracts, and grant agreements is also a significant consideration of the user.<sup>12.2</sup>

FN 12.2 Information requiring protection from unauthorized disclosure is referred to as "classified national security information." The application of federal financial accounting standards needs to support the legal requirements to protect classified national security information.

- 164g. To emphasize that materiality should be considered in applying the accounting standards, the Board will place the following notice at the end of each Statement of Federal Financial Accounting Standards (SFFAS):

The provisions of this Statement need not be applied to information if the effect of applying the provision(s) is immaterial.<sup>FN</sup>

FN: Refer to Statement of Federal Financial Accounting Concepts 1, *Objectives of Federal Financial Reporting*, chapter 7, titled *Materiality*, for a detailed discussion of the materiality concepts.

## AMENDMENT TO SFFAC 3, *MANAGEMENT'S DISCUSSION AND ANALYSIS*

2. This paragraph amends SFFAC 3, *Management's Discussion and Analysis*, footnote 10 at paragraph 26 as follows:

FN 10 Materiality of effects to be discussed should be evaluated in the context of the specific reporting entity, ~~not the Government as a whole.~~

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<sup>4</sup> SFFAC 1, par. 73 and 74 identify different kinds of accountability. These may be relevant qualitative considerations in determining materiality.

## APPENDIX A: BASIS FOR CONCLUSIONS

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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 concepts enunciated in this Statement—not the material in this appendix—should guide the development of standards for specific transactions, events, or conditions.

### PROJECT HISTORY

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- A1. The Board added the note disclosures project to its agenda in October 2017 with the objective of improving the relevance, clarity, consistency, and comparability of disclosures among federal entities. Staff formed a task force to assist the Board with the related research. The Board also conducted a survey on disclosures in which a majority of respondents indicated that materiality-based judgment can assist in eliminating redundant and unnecessary disclosures by providing only relevant information.
- A2. Currently, materiality concepts are discussed in three Statements: SFFAC 3; SFFAS 1, *Accounting for Selected Assets and Liabilities*; and SFFAS 3, *Accounting for Inventory and Related Property*. The Board concluded that the clarity, detail, and organization of that guidance could be improved. As such, the Board agreed to update the materiality guidance to assist preparers' and auditors' understanding of the Board's intention with respect to making materiality judgments and improving disclosures.
- A3. In February 2018, staff provided draft materiality concepts to the note disclosures task force. The task force included federal financial report preparers, auditors, and consultants. Task force members agreed the draft was not significantly different from their understanding of the application of materiality in practice, but it would help in applying materiality concepts in the federal environment by providing more clear, detailed, and organized guidance.

### MATERIALITY CONCEPTS

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- A4. This Statement does not include substantive changes to underlying materiality concepts. Rather, to provide better guidance, this Statement clarifies the materiality concepts by adding important elements, such as a discussion of the needs of reasonable users, a clearer concept of misstatement, and specific federal environment considerations. This Statement is also intended to enhance preparers' and auditors' understanding of the materiality concepts in federal financial reporting.
- A5. In developing this Statement, several sources were considered, including the materiality discussion in the current *FASAB Handbook*, other accounting standards boards' publications, relevant audit standards, and Securities and Exchange Commission (SEC) guidance.

- A6. The Board considered the guidance in the Government Accountability Office (GAO)'s *Government Auditing Standards* (GAS)<sup>5</sup> when assessing the materiality concepts for the federal environment. Similar to what is stated in GAS and noted in paragraph 164f, the needs of the federal government report user generally differ from those of the commercial entity financial report user. The Board considered the users identified in SFFAC 1 (citizens, Congress, federal executives, and federal program managers) in developing this *Materiality* Statement. In addition, paragraph 164f also highlights some important elements related to the visibility and sensitivity of government programs.
- A7. This Statement clarifies that materiality should be assessed using both quantitative and qualitative considerations. However, quantitative considerations (for example, magnitude of the misstatement), without considering the nature of the misstatement and the circumstances in which the judgment about it has to be made, generally do not provide a sufficient basis for a materiality judgment. Thus, misstatements should also be assessed using qualitative considerations to determine if those qualitative considerations can reasonably be expected to change or influence the judgment of a reasonable user.
- A8. The SEC Staff Accounting Bulletin Topic 1.M.1 states, "Even though a misstatement of an individual amount may not cause the financial statements taken as a whole to be materially misstated, it may nonetheless, when aggregated with other misstatements, render the financial statements taken as a whole to be materially misleading."<sup>6</sup> The Board has a similar view. Misstatements should be considered individually and in the aggregate.
- A9. Financial statements presented fairly in accordance with GAAP could contain misstatements as long as those misstatements are not material. Additionally, the Board believes materiality-based judgment in federal financial reporting can assist in eliminating redundant and unnecessary disclosures.
- A10. This Statement defines materiality in terms of the likelihood that a misstatement, including the omission of information, could reasonably be expected to affect the judgment of a reasonable user relying on the information. The Board ultimately concluded that "could reasonably be expected" conveyed the appropriate level of certainty to use in determining whether a misstatement would affect the judgment of a reasonable user. The Board noted that the meaning of "can reasonably be expected" in paragraph 33 of SFFAS 5, *Accounting for Liabilities of the Federal Government* may be ambiguous. SFFAS 5 paragraph 33 states, "'Probable' refers to that which can reasonably be expected or is believed to be more likely than not on the basis of available evidence or logic..." The Board concluded that "can reasonably be expected" or "is believed" represent alternatives, both qualifying "to be more likely than not" and was not intended to equate "reasonably be expected" with "more likely than not."
- A11. When developing the materiality definition in paragraph 164b, the Board considered the terms "probable" and "more likely than not" currently used in existing FASAB pronouncements, as alternatives to "could reasonably be expected". The Board noted that the inconsistencies throughout FASAB guidance in the meaning of "probable" may

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<sup>5</sup> GAO, *Government Auditing Standards 2018 Revision*, GAO-18-568G (Washington, D.C.: July 31, 2019), 109-110.

<sup>6</sup> The SEC 'Codification of Staff Accounting Bulletins, Topic 1: Financial Statements'; available online at <https://www.sec.gov/interps/account/sabcodet1.htm#M>; last accessed July 31, 2019.

cause confusion. The Board also does not believe “more likely than not” (more than a 50 percent chance of occurrence) is appropriate in assessing the overall application of materiality because it conveys a lower degree of likelihood compared to “can reasonably be expected.” Therefore, the Board concluded that both “probable” and “more likely than not” were not appropriate to be used in the materiality definition.

- A12. Prior to the exposure of the proposed materiality concepts, the Board also discussed whether to use “substantial likelihood” or “could reasonably be expected” in its materiality definition. The Board noted that “substantial likelihood” had not been previously used by FASAB and would require a specific definition that could inhibit the preparer’s judgment when applying materiality.
- A13. The public accountability of government entities, various legal and regulatory requirements, and the visibility and sensitivity of government programs, the materiality thresholds in federal practice may be different from those in the commercial practice. Each standard-setter sets its standards for the unique characteristics of its constituency. The Board concluded that, for purposes of this Statement, “could reasonably be expected” is based on whether a reasonable person would expect that a misstatement would affect the judgment of a reasonable user, and therefore “could reasonably be expected” allows appropriate flexibility and judgment in considering the specific facts, circumstances, size, and nature of the misstatement when assessing whether a misstatement is material. It also accommodates the distinguishing characteristics of the federal environment. Ultimately, the Board proposed “could reasonably be expected” in its exposure draft and received positive feedback on it from the respondents.
- A14. In arriving at the materiality definition in paragraph 164b, the Board also observed that materiality definitions vary among other standard-setters’ current and proposed guidance. Some of the materiality definitions include:
- a. The International Accounting Standards Board (IASB) uses “*could reasonably be expected to influence the decisions that the primary users of general purpose financial statements make.*”<sup>7</sup> [Emphasis added]
  - b. The Financial Accounting Standards Board (FASB) uses “*probable that the judgment of a reasonable person relying upon the report would have been changed or influenced.*”<sup>8</sup> [Emphasis added]
  - c. The Public Company Accounting Oversight Board (PCAOB) uses substantial likelihood in the following context: “...there are certain accounts or disclosures for which there is *a substantial likelihood that misstatements of lesser amounts than the materiality level established for the financial statements as a whole would influence the judgment of a reasonable investor.*”<sup>9</sup> [Emphasis added]
  - d. In addition, the Audit Standards Board (ASB) currently uses “Misstatements, including omissions, are considered to be material if, individually or in the aggregate, they *could reasonably be expected to influence economic decisions*

<sup>7</sup> IASB *Definition of Material (Amendments to IAS 1 and IAS 8)*, October 2018.

<sup>8</sup> FASB Concepts Statement No. 8 *Qualitative Characteristics of Useful Financial Information*, August 2018.

<sup>9</sup> PCAOB Auditing Standard No. 11 *Consideration of Materiality in Planning and Performing an Audit*, August 2010.

*of users that are taken based on the financial statements.” The ASB has proposed to use “Misstatements, including omissions, are considered to be material if there is a substantial likelihood that, individually or in the aggregate, they would influence the judgment of a reasonable user made based on the financial statements.”<sup>10</sup> [Emphasis added]*

- A15. The Board recognizes the differences in terms used by different standard-setters to define materiality. The Board also recognizes the possibility that the definitions of materiality may be applied differently by preparers and auditors. The Board considered the merits of convergence with the audit literature, but concluded that aligning the materiality definitions was not essential because materiality in terms of financial statement reporting is different from the financial statement audit perspective.
- A16. The Board does not provide specific quantitative or qualitative considerations in this Statement. Both quantitative and qualitative considerations are typically entity specific. Other existing literature already provides detailed guidance on materiality considerations. Materiality considerations could vary depending on whether the reporting entity is a sub-component, component, or the government-wide reporting entity.
- A17. In certain situations, an entity may have a quantitatively significant balance or activity that would lead to a quantitatively high entity-wide materiality threshold. If applied to the entity’s other balances or activities, such elevated materiality amounts could influence a reasonable user’s judgment regarding the rest of the entity’s activities. In such cases, qualitative factors should be considered to determine whether separate materiality considerations are warranted. Materiality may vary by financial statement, line item, or group of line items within that entity.

## SUMMARY OF OUTREACH EFFORTS AND RESPONSES

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- A18. The Board issued the exposure draft (ED) on October 15, 2018, with comments originally requested by January 23, 2019. In light of the partial government shutdown during the comment period, some departments and agencies may not have been able to respond by the deadline; therefore, FASAB extended the comment deadline to March 11, 2019.
- A19. Upon release of the ED, FASAB provided notices and press releases to the FASAB subscription email list, the *Federal Register*, FASAB News, the Journal of Accountancy, Association of Government Accountants Topics, the CPA Journal, Government Executive, the CPA Letter, the Financial Statement Audit Network, and committees of professional associations generally commenting on EDs in the past (for example, the Greater Washington Society of CPAs and the Association of Government Accountants Financial Management Standards Board).
- A20. The Board did not rely on the number of respondents 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 each response and weighed the

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<sup>10</sup> On June, 2019, the ASB issued an exposure draft of a proposed Statement on Auditing Standards, *Amendments to the Description of the Concept of Materiality*.



merits of the points raised. The respondents' significant comments and Board response are summarized below.

- A21. FASAB received 19 responses from preparers, users of federal financial information, and professional associations. Nearly all respondents agreed with the proposed materiality concepts and their placement in a concepts statement. The placement in a concepts statement provides broad flexibility when exercising materiality judgments, while also providing consistency across standards without overriding existing materiality guidance. In addition, respondents also agreed that this guidance is not significantly different from their current application of materiality in practice.
- A22. Some respondents suggested creating a separate chapter in SFFAC 1 regarding materiality due to its importance. After carefully considering the comments received and the fact that materiality concepts may affect a reporting entity at various levels and areas of responsibility, accountability, and mission, the Board decided to place the materiality guidance in SFFAC 1 by creating a new chapter 7 titled *Materiality*.
- A23. Based on several respondents' suggestions, the Board modified the following guidance originally proposed in the ED:
- a. The Board eliminated the following wording from paragraph 164c: "Therefore, misstatements of relatively small amounts could have a material effect on the financial statements. For example, an amount that is not quantitatively material with respect to a very large line item may be material with respect to a smaller line item." This avoids the misinterpretation that each line would have its own unique quantitative materiality value.
  - b. The Board defined the term "reasonable financial report user (reasonable user)" in footnote 2 to ensure consistency and clarity of its use throughout the guidance.
- A24. Some respondents suggested providing detailed quantitative and qualitative guidance or references to other existing literature for materiality considerations. The Board concluded that its emphasis on the importance of evaluating both quantitative and qualitative factors in the determination of materiality, without providing specifics, allows entities broader flexibility in exercising materiality judgments. References to existing literature would not be valuable, as it is not the Board's intent to endorse or prioritize these sources. As such, no specific reference to other existing literature is provided.
- A25. Several respondents asked about the effect of this guidance on the existing non-authoritative sections of other Statements and the *FASAB Handbook*, where materiality is also discussed. For example, there is a materiality discussion in the Introduction sections of SFFAS 1 and SFFAS 3 and in the Foreword section of the *FASAB Handbook*. These sections are considered non-authoritative guidance and will be updated with a reference to this Statement.
- A26. Additionally, the Board observed that existing concepts and standards discuss materiality in the context of management's discussion and analysis (MD&A). SFFAC 3's Figure 1: Schematic Diagram of a Sample General Purpose Federal Financial Report states:

The assertions and report on control called for by the Federal Managers Financial Integrity Act (FMFIA or Integrity Act) would not be stated in full in

MD&A. They would be reported in a discrete section of the GPFFR or incorporated in the GPFFR by reference. They are within the scope of MD&A because highly important aspects of systems, compliance, and internal controls should be discussed in MD&A. “Highly important” in this context may imply a higher threshold than “materiality” for the financial statements.

SFFAS 15, *Management’s Discussions and Analysis*, paragraph 5 states:

Because MD&A must be concise if it is to be useful, management must select the most important matters to discuss. This means that some items that are material to the financial statements, notes, and other sections of the GPFFR may not be discussed in MD&A.

The issuance of this Statement does not affect the materiality considerations applied to MD&A as stated in SFFAC 3 and SFFAS 15.

## BOARD APPROVAL

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- A27. This Statement was approved unanimously. The written ballots are available for public inspection at FASAB’s office.



## APPENDIX B: ABBREVIATIONS

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ED	Exposure Draft
FASAB	Federal Accounting Standards Advisory Board
FN	Footnote
GAAP	Generally Accepted Accounting Principles
GAO	Government Accountability Office
GAS	Government Auditing Standards
GPFFR	General Purpose Federal Financial Report
MD&A	Management's Discussion and Analysis
SEC	Securities and Exchange Commission
SFFAC	Statement of Federal Financial Accounting Concepts
SFFAS	Statement of Federal Financial Accounting Standards

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## MATERIALITY:

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*CLEAN VERSION*

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## **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 of the United States 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.

Accounting standards are 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 for comment, or preliminary views document may be published before an exposure draft is published 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 standards 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 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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## PREAMBLE TO STATEMENTS OF FEDERAL FINANCIAL ACCOUNTING CONCEPTS

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This Statement of Federal Financial Accounting Concepts (SFFAC) is the ninth in a series of concepts statements intended to set forth objectives and fundamentals on which financial accounting and reporting standards will be based. The objectives identify the goals and purposes of financial reporting. The fundamentals are the underlying concepts of financial accounting-concepts that guide the selection of transactions, events, and circumstances to be accounted for; their recognition and measurement; and the means of summarizing and communicating them to interested parties.

The Federal Accounting Standards Advisory Board's (FASAB or "the Board") conceptual framework enhances the consistency of standards and serves the public interest by providing structure and direction to federal financial accounting and reporting. The most direct beneficiaries of the FASAB's concepts statements are the Board itself and preparers and auditors of federal financial reports. The statements guide the Board's development of accounting and reporting standards by providing the Board with a common foundation and basic reasoning on which to consider the merits of alternatives.

Knowledge of the objectives and concepts the Board considers should help users and others who are affected by or interested in federal financial accounting and reporting standards to understand better the purposes, content, and qualitative characteristics of information provided by federal financial accounting and reporting. That knowledge should enhance the usefulness of, and confidence in, federal financial accounting and reporting.

Concepts statements enhance preparers' and auditors' understanding of the common foundation and reasoning employed in considering alternatives. The GAAP hierarchy provides that statements of federal financial accounting standards constitute level A (the highest level) guidance. Statements of federal financial accounting concepts are not GAAP. Instead, concepts statements constitute "other literature" and may only be relied upon by financial statement preparers and auditors to resolve specific accounting issues in the absence of GAAP literature. In developing and amending accounting standards, the Board looks to concepts statements for guiding principles and also considers relevant existing standards and guidance issued by the Board and other standard setting bodies. Until the Board amends existing standards, the Board expects practice to be governed by the accounting principles embodied in the four levels of the GAAP hierarchy. Thus, the Board distinguishes between material presented in concepts which are used to guide Board deliberations on future GAAP and accounting principles presented in standards which constitute current GAAP.

For federal entities, in the absence of specific authoritative literature applicable to a transaction or event, it should be possible to report the event or transaction by selecting an established accounting principle for an analogous transaction or event that appears appropriate when applied in a similar manner. In the unusual case where an analogy cannot be drawn to established authoritative literature, the GAAP hierarchy permits consideration of other literature including concepts statements. Consideration of individual concepts statements will be helpful but often may not provide sufficient guidance in resolving emerging issues. Therefore, the Board encourages careful study of the conceptual framework and established practice in resolving such issues.

Statements in this series describe concepts and relations that will underlie future federal financial accounting standards and practices and in due course will serve as a basis for evaluating existing standards and practices. With issuance of this statement, the series of concepts statements comprises:

- SFFAC 1, *Objectives of Federal Financial Reporting (includes the qualitative characteristics of information in financial reports)*
- SFFAC 2, *Entity and Display*
- SFFAC 3, *Management's Discussion and Analysis*
- SFFAC 4, *Intended Audience and Qualitative Characteristics for the Consolidated Financial Report of the United States Government*
- SFFAC 5, *Elements of Accrual-Basis Financial Statements and Basic Recognition Criteria*
- SFFAC 6, *Distinguishing Basic Information, Required Supplementary Information, and Other Accompanying Information*
- SFFAC 7, *Measurement of the Elements of Accrual-Basis Financial Statements in Periods After Initial Recording*
- SFFAC 8, *Federal Financial Reporting*

Like other pronouncements of the FASAB, Statements of Federal Financial Accounting Concepts remain in effect until amended, superseded, or withdrawn by appropriate action under the Board's Rules of Procedure.

## SUMMARY

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This Statement of Federal Financial Accounting Concepts (Statement or SFFAC) updates concepts related to the application of materiality in the federal financial reporting environment. Through amendments to SFFAC 1, *Objectives of Federal Financial Reporting*, and SFFAC 3, *Management's Discussion and Analysis*, this SFFAC clarifies implementation of materiality concepts in the issuance of federal financial statements.

A reporting entity considers materiality in the application of specific requirements to information contained in its general purpose federal financial reports. This Statement clarifies the materiality guidance. It defines the users, scope, and factors to consider when applying materiality in the federal environment. This Statement will also enhance preparers' and auditors' understanding of the materiality concepts in federal financial reporting.

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## CONCEPTS

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### AMENDMENTS TO SFFAC 1, *OBJECTIVES OF FEDERAL FINANCIAL REPORTING*

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1. This paragraph amends Statement of Federal Financial Accounting Concepts (Statement or SFFAC) 1, *Objectives of Federal Financial Reporting*, by inserting a chapter titled *Materiality* between the current chapter 6: *Qualitative Characteristics of Information in Financial Reports* and chapter 7: *How Accounting Supports Federal Financial Reporting*. The new *Materiality* chapter is as follows:<sup>1</sup>

- 164a. A reporting entity considers materiality in the application of accounting and reporting requirements. The Federal Accounting Standards Advisory Board (FASAB or “the Board”) intends that information presented in accordance with generally accepted accounting principles (GAAP)<sup>12.1</sup> will not contain misstatements, including omissions of information, considered material. Such omissions include information that is necessary for a reasonable financial report user (reasonable user)<sup>2</sup> to understand the effect of particular material transactions, other events, and conditions on the entity’s financial statements, notes to the financial statements, and required supplementary information.<sup>3</sup>

Footnote (FN) 12.1 Such information would include financial statements, notes to the financial statements, and required supplementary information.

- 164b. A misstatement, including omission of information, is material if, in light of surrounding facts and circumstances, it could reasonably be expected that the judgment of a reasonable user relying on the information would change or be influenced by the correction or inclusion of the information.
- 164c. Materiality should be evaluated in the context of the specific reporting entity. Determining materiality requires appropriate and reasonable judgment in considering the specific facts, circumstances, size, and nature of the misstatement. Consequently, after quantitative and qualitative factors are considered, materiality may vary by financial statement, line item, or group of line items within an entity.
- 164d. Misstatements should be considered individually and in the aggregate. Materiality determinations regarding such misstatements should include consideration of both qualitative and quantitative factors. Information that is not considered quantitatively material may be considered qualitatively material if it can reasonably be expected to change or influence the judgment of a reasonable user. Qualitative

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<sup>1</sup> The inserted chapter will become chapter 7: *Materiality* and the existing chapters following chapter 6 in SFFAC 1 will be renumbered to accommodate the insertion.

<sup>2</sup> A reasonable financial report user has appropriate knowledge of the federal government’s activities and reviews and analyzes the information diligently.

<sup>3</sup> Statement of Federal Financial Accounting Standards 57, *Omnibus Amendments 2019*, eliminates required supplementary stewardship information (RSSI) in the general purpose federal financial report.

considerations include the public accountability<sup>4</sup> of the reporting entity; applicable legal and regulatory requirements; the visibility and sensitivity of government programs, activities, and functions; as well as other factors that may affect a reasonable user's judgment about the information.

- 164e. Materiality concepts and related factors should be considered when making materiality judgments. While specific qualitative and quantitative thresholds for materiality are not provided in this Statement, illustrative factors are discussed in paragraphs 164c and 164d.
- 164f. In applying materiality concepts, the specific needs of a reasonable user should be considered. In the federal government environment, such needs generally differ from those of the commercial entity financial report user. For example, due to the visibility and sensitivity of government programs, the needs of federal government financial report users extend to having the ability to assess the allocation and use of resources in the federal government. Compliance with laws, regulations, contracts, and grant agreements is also a significant consideration of the user.<sup>12.2</sup>

FN 12.2 Information requiring protection from unauthorized disclosure is referred to as "classified national security information." The application of federal financial accounting standards needs to support the legal requirements to protect classified national security information.

- 164g. To emphasize that materiality should be considered in applying the accounting standards, the Board will place the following notice at the end of each Statement of Federal Financial Accounting Standards (SFFAS):

The provisions of this Statement need not be applied to information if the effect of applying the provision(s) is immaterial.<sup>FN</sup>

FN: Refer to Statement of Federal Financial Accounting Concepts 1, *Objectives of Federal Financial Reporting*, chapter 7, titled *Materiality*, for a detailed discussion of the materiality concepts.

## AMENDMENT TO SFFAC 3, *MANAGEMENT'S DISCUSSION AND ANALYSIS*

2. This paragraph amends SFFAC 3, *Management's Discussion and Analysis*, footnote 10 at paragraph 26 as follows:

FN 10 Materiality of effects to be discussed should be evaluated in the context of the specific reporting entity, ~~not the Government as a whole.~~

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<sup>4</sup> SFFAC 1, par. 73 and 74 identify different kinds of accountability. These may be relevant qualitative considerations in determining materiality.

## APPENDIX A: BASIS FOR CONCLUSIONS

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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 concepts enunciated in this Statement—not the material in this appendix—should guide the development of standards for specific transactions, events, or conditions.

### PROJECT HISTORY

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- A1. The Board added the note disclosures project to its agenda in October 2017 with the objective of improving the relevance, clarity, consistency, and comparability of disclosures among federal entities. Staff formed a task force to assist the Board with the related research. The Board also conducted a survey on disclosures in which a majority of respondents indicated that materiality-based judgment can assist in eliminating redundant and unnecessary disclosures by providing only relevant information.
- A2. Currently, materiality concepts are discussed in three Statements: SFFAC 3; SFFAS 1, *Accounting for Selected Assets and Liabilities*; and SFFAS 3, *Accounting for Inventory and Related Property*. The Board concluded that the clarity, detail, and organization of that guidance could be improved. As such, the Board agreed to update the materiality guidance to assist preparers' and auditors' understanding of the Board's intention with respect to making materiality judgments and improving disclosures.
- A3. In February 2018, staff provided draft materiality concepts to the note disclosures task force. The task force included federal financial report preparers, auditors, and consultants. Task force members agreed the draft was not significantly different from their understanding of the application of materiality in practice, but it would help in applying materiality concepts in the federal environment by providing more clear, detailed, and organized guidance.

### MATERIALITY CONCEPTS

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- A4. This Statement does not include substantive changes to underlying materiality concepts. Rather, to provide better guidance, this Statement clarifies the materiality concepts by adding important elements, such as a discussion of the needs of reasonable users, a clearer concept of misstatement, and specific federal environment considerations. This Statement is also intended to enhance preparers' and auditors' understanding of the materiality concepts in federal financial reporting.
- A5. In developing this Statement, several sources were considered, including the materiality discussion in the current *FASAB Handbook*, other accounting standards boards' publications, relevant audit standards, and Securities and Exchange Commission (SEC) guidance.

- A6. The Board considered the guidance in the Government Accountability Office (GAO)'s *Government Auditing Standards* (GAS)<sup>5</sup> when assessing the materiality concepts for the federal environment. Similar to what is stated in GAS and noted in paragraph 164f, the needs of the federal government report user generally differ from those of the commercial entity financial report user. The Board considered the users identified in SFFAC 1 (citizens, Congress, federal executives, and federal program managers) in developing this *Materiality* Statement. In addition, paragraph 164f also highlights some important elements related to the visibility and sensitivity of government programs.
- A7. This Statement clarifies that materiality should be assessed using both quantitative and qualitative considerations. However, quantitative considerations (for example, magnitude of the misstatement), without considering the nature of the misstatement and the circumstances in which the judgment about it has to be made, generally do not provide a sufficient basis for a materiality judgment. Thus, misstatements should also be assessed using qualitative considerations to determine if those qualitative considerations can reasonably be expected to change or influence the judgment of a reasonable user.
- A8. The SEC Staff Accounting Bulletin Topic 1.M.1 states, "Even though a misstatement of an individual amount may not cause the financial statements taken as a whole to be materially misstated, it may nonetheless, when aggregated with other misstatements, render the financial statements taken as a whole to be materially misleading."<sup>6</sup> The Board has a similar view. Misstatements should be considered individually and in the aggregate.
- A9. Financial statements presented fairly in accordance with GAAP could contain misstatements as long as those misstatements are not material. Additionally, the Board believes materiality-based judgment in federal financial reporting can assist in eliminating redundant and unnecessary disclosures.
- A10. This Statement defines materiality in terms of the likelihood that a misstatement, including the omission of information, could reasonably be expected to affect the judgment of a reasonable user relying on the information. The Board ultimately concluded that "could reasonably be expected" conveyed the appropriate level of certainty to use in determining whether a misstatement would affect the judgment of a reasonable user. The Board noted that the meaning of "can reasonably be expected" in paragraph 33 of SFFAS 5, *Accounting for Liabilities of the Federal Government* may be ambiguous. SFFAS 5 paragraph 33 states, "'Probable' refers to that which can reasonably be expected or is believed to be more likely than not on the basis of available evidence or logic..." The Board concluded that "can reasonably be expected" or "is believed" represent alternatives, both qualifying "to be more likely than not" and was not intended to equate "reasonably be expected" with "more likely than not."
- A11. When developing the materiality definition in paragraph 164b, the Board considered the terms "probable" and "more likely than not" currently used in existing FASAB pronouncements, as alternatives to "could reasonably be expected". The Board noted that the inconsistencies throughout FASAB guidance in the meaning of "probable" may

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<sup>5</sup> GAO, *Government Auditing Standards 2018 Revision*, GAO-18-568G (Washington, D.C.: July 31, 2019), 109-110.

<sup>6</sup> The SEC 'Codification of Staff Accounting Bulletins, Topic 1: Financial Statements'; available online at <https://www.sec.gov/interps/account/sabcodet1.htm#M>; last accessed July 31, 2019.

cause confusion. The Board also does not believe “more likely than not” (more than a 50 percent chance of occurrence) is appropriate in assessing the overall application of materiality because it conveys a lower degree of likelihood compared to “can reasonably be expected.” Therefore, the Board concluded that both “probable” and “more likely than not” were not appropriate to be used in the materiality definition.

- A12. Prior to the exposure of the proposed materiality concepts, the Board also discussed whether to use “substantial likelihood” or “could reasonably be expected” in its materiality definition. The Board noted that “substantial likelihood” had not been previously used by FASAB and would require a specific definition that could inhibit the preparer’s judgment when applying materiality.
- A13. The public accountability of government entities, various legal and regulatory requirements, and the visibility and sensitivity of government programs, the materiality thresholds in federal practice may be different from those in the commercial practice. Each standard-setter sets its standards for the unique characteristics of its constituency. The Board concluded that, for purposes of this Statement, “could reasonably be expected” is based on whether a reasonable person would expect that a misstatement would affect the judgment of a reasonable user, and therefore “could reasonably be expected” allows appropriate flexibility and judgment in considering the specific facts, circumstances, size, and nature of the misstatement when assessing whether a misstatement is material. It also accommodates the distinguishing characteristics of the federal environment. Ultimately, the Board proposed “could reasonably be expected” in its exposure draft and received positive feedback on it from the respondents.
- A14. In arriving at the materiality definition in paragraph 164b, the Board also observed that materiality definitions vary among other standard-setters’ current and proposed guidance. Some of the materiality definitions include:
- a. The International Accounting Standards Board (IASB) uses “*could reasonably be expected to influence the decisions that the primary users of general purpose financial statements make.*”<sup>7</sup> [Emphasis added]
  - b. The Financial Accounting Standards Board (FASB) uses “*probable that the judgment of a reasonable person relying upon the report would have been changed or influenced.*”<sup>8</sup> [Emphasis added]
  - c. The Public Company Accounting Oversight Board (PCAOB) uses substantial likelihood in the following context: “...there are certain accounts or disclosures for which there is *a substantial likelihood that misstatements of lesser amounts than the materiality level established for the financial statements as a whole would influence the judgment of a reasonable investor.*”<sup>9</sup> [Emphasis added]
  - d. In addition, the Audit Standards Board (ASB) currently uses “Misstatements, including omissions, are considered to be material if, individually or in the aggregate, they *could reasonably be expected to influence economic decisions*

<sup>7</sup> IASB *Definition of Material (Amendments to IAS 1 and IAS 8)*, October 2018.

<sup>8</sup> FASB Concepts Statement No. 8 *Qualitative Characteristics of Useful Financial Information*, August 2018.

<sup>9</sup> PCAOB Auditing Standard No. 11 *Consideration of Materiality in Planning and Performing an Audit*, August 2010.

*of users that are taken based on the financial statements.” The ASB has proposed to use “Misstatements, including omissions, are considered to be material if there is a substantial likelihood that, individually or in the aggregate, they would influence the judgment of a reasonable user made based on the financial statements.”<sup>10</sup> [Emphasis added]*

- A15. The Board recognizes the differences in terms used by different standard-setters to define materiality. The Board also recognizes the possibility that the definitions of materiality may be applied differently by preparers and auditors. The Board considered the merits of convergence with the audit literature, but concluded that aligning the materiality definitions was not essential because materiality in terms of financial statement reporting is different from the financial statement audit perspective.
- A16. The Board does not provide specific quantitative or qualitative considerations in this Statement. Both quantitative and qualitative considerations are typically entity specific. Other existing literature already provides detailed guidance on materiality considerations. Materiality considerations could vary depending on whether the reporting entity is a sub-component, component, or the government-wide reporting entity.
- A17. In certain situations, an entity may have a quantitatively significant balance or activity that would lead to a quantitatively high entity-wide materiality threshold. If applied to the entity’s other balances or activities, such elevated materiality amounts could influence a reasonable user’s judgment regarding the rest of the entity’s activities. In such cases, qualitative factors should be considered to determine whether separate materiality considerations are warranted. Materiality may vary by financial statement, line item, or group of line items within that entity.

## SUMMARY OF OUTREACH EFFORTS AND RESPONSES

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- A18. The Board issued the exposure draft (ED) on October 15, 2018, with comments originally requested by January 23, 2019. In light of the partial government shutdown during the comment period, some departments and agencies may not have been able to respond by the deadline; therefore, FASAB extended the comment deadline to March 11, 2019.
- A19. Upon release of the ED, FASAB provided notices and press releases to the FASAB subscription email list, the *Federal Register*, FASAB News, the Journal of Accountancy, Association of Government Accountants Topics, the CPA Journal, Government Executive, the CPA Letter, the Financial Statement Audit Network, and committees of professional associations generally commenting on EDs in the past (for example, the Greater Washington Society of CPAs and the Association of Government Accountants Financial Management Standards Board).
- A20. The Board did not rely on the number of respondents 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 each response and weighed the

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<sup>10</sup> On June, 2019, the ASB issued an exposure draft of a proposed Statement on Auditing Standards, *Amendments to the Description of the Concept of Materiality*.



merits of the points raised. The respondents' significant comments and Board response are summarized below.

- A21. FASAB received 19 responses from preparers, users of federal financial information, and professional associations. Nearly all respondents agreed with the proposed materiality concepts and their placement in a concepts statement. The placement in a concepts statement provides broad flexibility when exercising materiality judgments, while also providing consistency across standards without overriding existing materiality guidance. In addition, respondents also agreed that this guidance is not significantly different from their current application of materiality in practice.
- A22. Some respondents suggested creating a separate chapter in SFFAC 1 regarding materiality due to its importance. After carefully considering the comments received and the fact that materiality concepts may affect a reporting entity at various levels and areas of responsibility, accountability, and mission, the Board decided to place the materiality guidance in SFFAC 1 by creating a new chapter 7 titled *Materiality*.
- A23. Based on several respondents' suggestions, the Board modified the following guidance originally proposed in the ED:
- a. The Board eliminated the following wording from paragraph 164c: "Therefore, misstatements of relatively small amounts could have a material effect on the financial statements. For example, an amount that is not quantitatively material with respect to a very large line item may be material with respect to a smaller line item." This avoids the misinterpretation that each line would have its own unique quantitative materiality value.
  - b. The Board defined the term "reasonable financial report user (reasonable user)" in footnote 2 to ensure consistency and clarity of its use throughout the guidance.
- A24. Some respondents suggested providing detailed quantitative and qualitative guidance or references to other existing literature for materiality considerations. The Board concluded that its emphasis on the importance of evaluating both quantitative and qualitative factors in the determination of materiality, without providing specifics, allows entities broader flexibility in exercising materiality judgments. References to existing literature would not be valuable, as it is not the Board's intent to endorse or prioritize these sources. As such, no specific reference to other existing literature is provided.
- A25. Several respondents asked about the effect of this guidance on the existing non-authoritative sections of other Statements and the *FASAB Handbook*, where materiality is also discussed. For example, there is a materiality discussion in the Introduction sections of SFFAS 1 and SFFAS 3 and in the Foreword section of the *FASAB Handbook*. These sections are considered non-authoritative guidance and will be updated with a reference to this Statement.
- A26. Additionally, the Board observed that existing concepts and standards discuss materiality in the context of management's discussion and analysis (MD&A). SFFAC 3's Figure 1: Schematic Diagram of a Sample General Purpose Federal Financial Report states:

The assertions and report on control called for by the Federal Managers Financial Integrity Act (FMFIA or Integrity Act) would not be stated in full in

MD&A. They would be reported in a discrete section of the GPFFR or incorporated in the GPFFR by reference. They are within the scope of MD&A because highly important aspects of systems, compliance, and internal controls should be discussed in MD&A. “Highly important” in this context may imply a higher threshold than “materiality” for the financial statements.

SFFAS 15, *Management’s Discussions and Analysis*, paragraph 5 states:

Because MD&A must be concise if it is to be useful, management must select the most important matters to discuss. This means that some items that are material to the financial statements, notes, and other sections of the GPFFR may not be discussed in MD&A.

The issuance of this Statement does not affect the materiality considerations applied to MD&A as stated in SFFAC 3 and SFFAS 15.

## BOARD APPROVAL

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- A27. This Statement was approved unanimously. The written ballots are available for public inspection at FASAB’s office.



## APPENDIX B: ABBREVIATIONS

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ED	Exposure Draft
FASAB	Federal Accounting Standards Advisory Board
FN	Footnote
GAAP	Generally Accepted Accounting Principles
GAO	Government Accountability Office
GAS	Government Auditing Standards
GPFFR	General Purpose Federal Financial Report
MD&A	Management's Discussion and Analysis
SEC	Securities and Exchange Commission
SFFAC	Statement of Federal Financial Accounting Concepts
SFFAS	Statement of Federal Financial Accounting Standards

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**Federal Accounting Standards Advisory Board**

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Date: November 26, 2019

To: Members of the Board

From: Monica R. Valentine, Executive Director

Subject: **Ballot for Statement of Federal Financial Accounting Concepts 9, *Materiality***

The following is a ballot for SFFAC 9. Please enter your name in the space provided below and indicate your approval or disapproval. Please return the ballot, or e-mail the ballot to me at [ValentineM@fasab.gov](mailto:ValentineM@fasab.gov). Alternatively, you may fax the signed ballot to 202 512-7366.

Ballots are due by **December 20, 2019**. Members not responding by **December 27, 2019** will be considered to have abstained. If you decide to write a dissent, please notify staff immediately and provide your dissent as soon as possible but no later than **December 4, 2019**. Any dissents received will be circulated to other members as soon as possible so that they may consider the views of the dissenting member.

Board Member: \_\_\_\_\_

Date: \_\_\_\_\_

\_\_\_\_\_ I approve the subject SFFAC

\_\_\_\_\_ I do not approve the subject SFFAC