



January 7, 2025

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”) Three-Year Plan.

The GWSCPA consists of approximately 3,300 members, and the FISC includes nearly 20 GWSCPA members who are active in financial management, accounting, and auditing in the Federal sector. We sincerely appreciate the opportunity by the Board to share our views.

FASAB’s Three-Year Plan is an ambitious agenda and is designed to continue to meet the needs of users of Federal financial information. The plan includes projects that are considered priorities of the Board that are intended to address emerging issues and improve the usefulness and transparency of the Federal financial information to the users. A number of projects identified by the Board are intended to address issues and areas of growing interest of users, including climate-related financial reporting, accounting and reporting of intangible assets, and reexamination of existing standards. We also provide the following suggestions:

- **Federal GAAP Hierarchy:** The FISC commends the Board on identifying this topic as one of the top areas for reexamination. Given the importance of this project to members of the Federal financial reporting community, the FISC recommends that the Board consider accelerating the activities and timeline for this project to address the potential inconsistency that might exist in application by preparers of Federal agencies’ financial statements.
- **Intangible Assets:** The FISC recommends that the Board expands the scope of the software technology project to include providing guidance for the other significant software technology topics discussed in the Three-Year Plan, including, artificial intelligence, digital assets, and cybersecurity. Given the increased use of these technologies throughout the Federal community, guidance on how to account for and report these technologies will be of great importance to Federal agencies.
- **Going Concern:** The FISC recommends that the Board considers incorporating into an existing or potential project the task of providing Federal agencies with technical guidance on going concern, such as situations in which policy decisions have been made or are threatened that could affect either the services a Federal agency provides or its ability to continue to exist. Recent statements by members of the incoming Administration point

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to increased risk that such circumstances could exist in the near future. Such guidance would provide Federal agencies with examples of indicators that may raise substantial doubt about a Federal agency's ability to continue as a going concern for a reasonable period of time and related reporting requirements.

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

Very truly yours,

A handwritten signature in black ink, appearing to read "S. Ettifa". The signature is fluid and cursive, with a large initial "S" and a stylized "Ettifa".

Sherif R. Ettifa
FISC Chair