

Memorandum

Non-Agenda Topics

November 19, 2025

To: Members of the Board
From: Monica R. Valentine, Executive Director
Subject: **Non-Agenda Project Updates** (Topic H)

OBJECTIVE

Staff is providing project updates on all active projects currently on the Board's technical agenda and research topics that will not be discussed at the December 2025 meeting.

Attachment 1 of this memo includes brief updates on the following topics.

Technical Agenda Projects

- Intangible Assets Guidance
- Land Post-implementation
- Management's Discussion and Analysis Implementation

Research Topics

- Revenue Reexamination
- Reporting Entity Reorganizations and Abolishments

REQUEST FOR FEEDBACK

These topics do not include any questions for the Board or requests for member feedback. These topics will not be on the Board's discussion agenda for December. Members may provide input and submit follow-up questions on any of these topics to the related staff member at any time.

ATTACHMENT

1. Updates

Updates

Non-Agenda Topics

November 19, 2025

Attachment 1

TECHNICAL AGENDA PROJECTS

INTANGIBLE ASSETS GUIDANCE

At the February 2025 meeting, the Board agreed with staff's recommended concepts amendments for both SFFAC 2, *Entity and Display*, and SFFAC 5, *Definitions of Elements and Basic Recognition Criteria for Accrual-Basis Financial Statements*, to address intangible assets at a minimal and high level. Additionally, the Board agreed with staff's recommended scope, definition, and recognition language for intangible asset standards.

Staff continues to coordinate with the working group to research and recommend accounting guidance for intangible asset standards. Staff will also develop a draft exposure draft for the agreed upon intangible asset concepts amendments in an omnibus concepts amendment Statement for the Board to consider in the future.

LAND POST-IMPLEMENTATION

At the August meeting, the Board moved to approve the issuance of the Technical Bulletin (TB), *Technical Clarifications: SFFAS 59, Accounting and Reporting of Government Land*. Staff was asked to clarify an additional matter raised by a member concerning permanent land rights and to provide an updated draft for final Board review and issuance.

Staff provided an updated draft for further discussion and review after the August meeting.

MD&A: SFFAS 64 IMPLEMENTATION

In May 2025, staff completed four months of trainings to assist agencies in transitioning MD&A reporting from SFFAS 15 to SFFAS 64. Staff is now developing a proposed Staff Implementation Guidance (SIG 64.1) based on information collected from these agency trainings.

In addition to developing SIG 64.1 proposal, staff continues to work with agencies on implementing SFFAS 64. In July 2025, staff worked with on the Department of Defense (DOD), Federal Aviation Administration (FAA), Federal Trade Commission (FTC) and National Reconnaissance Office (NRO) by reviewing and providing feedback on their draft MD&As to assist with their transition to SFFAS 64.

RESEARCH TOPICS

REVENUE REEXAMINATION

At the August 2024 meeting, the Board added Revenue reexamination as a research topic. Staff will be preparing a research plan for the Board's consideration. Prior to developing this plan, however, staff is reaching out to certain ITC respondents to obtain clarification and receive updates on the status of the high-priority issues raised in their comment letters. This follow-up will help staff design an appropriate research plan and facilitate the Board's review of that plan. Follow-up with certain key ITC respondents remains in process.

At the April Board meeting, the Board discussed resource limitations and project prioritization issues. It was noted that the staff member assigned to the revenue reexamination research project would be assigned to the proposed project on reporting entity reorganizations and abolishments. The Board agreed to add the proposed project to its technical agenda. The Board acknowledged that this would delay the continuation of research on the revenue reexamination project for the time being.

REPORTING ENTITY REORGANIZATIONS AND ABOLISHMENTS

At the August 2025 meeting, the Board discussed feedback received through the request for information and comment and additional research. Much of the information provided was tentative and characterized by considerable uncertainty, such as further executive, legislative, judicial branch actions or reviews.

Members agreed to move the project to the research agenda and develop a project prospectus. A few members discussed the importance of actively monitoring this area, responding to emerging issues, and developing the project prospectus in the coming months for consideration in February 2026.