

*Debt Cancellation: An Interpretation of SFFAS 7, Paragraph 313*

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**Please provide your name.**

Name: Christian Hellie, Acting Associate Commissioner, Office of Financial Policy and Operations

**Please identify your organization, if applicable.**

Organization: Social Security Administration (SSA)

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**Q1.** Statement of Federal Financial Accounting Standards (SFFAS) 7, *Accounting for Revenue and Other Financing Sources and Concepts for Reconciling Budgetary and Financial Accounting*, paragraph 313 provides:

Cancellation of debt.—The debt that an entity owes Treasury (or other agency) may be canceled by Act of Congress. The amount of debt that is canceled (including the amount of capitalized interest that is canceled, if any) is a gain to the entity whose debt is canceled and a loss to Treasury (or other agency). The purpose of borrowing authority is generally to provide an entity with capital rather than to finance its operations. Therefore, the cancellation of debt is not earned by the entity's operations and is not directly related to the entity's costs of providing goods and services. As a result, the cancellation is a nonexchange gain to the entity that owed the debt and a nonexchange loss to the lender.

Statement of Federal Financial Accounting Concepts (SFFAC) 2, *Entity and Display*, paragraph 100 provides that nonexchange activity is reported on the statement of changes in net position (SCNP).

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This proposed Interpretation would clarify that the standards provide that debt cancellation is a nonexchange activity and should be reported on the SCNP. This proposed Interpretation would also clarify that paragraph 313 of SFFAS 7 should not be interpreted to require that a particular line item<sup>1</sup> “gain” or “loss” be displayed on the SCNP. In addition, reporting entity management is responsible for determining the most appropriate line item presentation and display and related disclosures, such as information about the debt cancellation. Refer to paragraphs 2-8 and A6-A18.

- a. Do you agree or disagree with the guidance? Please provide the rationale for your answer.

SSA Response: We agree with the proposed guidance. We believe that it will clarify the Board’s intentions in regards to reporting debt cancellation and the appropriate presentation and display thereof. We appreciate clarifications that will assist stakeholders in avoiding confusion and disagreement and ensuring the proper reporting of financial information.

However, we did note throughout the exposure draft that references to Statement of Federal Financial Accounting Concepts (SFFAC) 2 state, “...paragraph 100 provides that non-exchange activity is reported on the statement of changes in net position (SCNP).” Whereas, the actual wording in SFFAC 2 paragraph 100 is “non-exchange revenues.” We believe the actual wording of SFFAC 2 paragraph 100 should be used to eliminate further confusion. Clarifying sentence(s) could be added to define other non-exchange activities (gains/losses, etc.) if the intention was to use “activity” to put a broad umbrella over all the possibilities.

- Q2. Paragraph 3 of the proposed Interpretation refers to “other financing sources” as defined by SFFAS 7. Under SFFAS 7, financing sources are divided into three categories: exchange revenue, nonexchange revenue, and “other.” As discussed in paragraph A22, FASAB coordinated with the Office of Management and Budget (OMB) and determined that certain changes to the form and content requirements provided for the statement of changes in net position (SCNP) in OMB Circular A-136 would ensure clarity and consistency with generally accepted accounting principles (GAAP). Specifically, eliminating the sub-categories “Budgetary Financing Sources” and “Other Financing Sources (Nonexchange)” presented under the Cumulative Results on the SCNP would simplify the presentation and thereby enhance the clarity. In the next update to the [FASAB Handbook of Accounting Standards and Other Pronouncements, as Amended](#), FASAB plans to make similar changes to non-authoritative illustrative financial statements presented in SFFAS 27 and SFFAS 43. Refer to paragraphs 9 and A22.

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<sup>1</sup> While in certain standards, the Board may have determined that requiring a specific line item for display was appropriate, most standards do not prescribe a specific reference or line item display because items may need to be displayed separately or be included with other items due to materiality.

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- a. **Is there a need for additional clarity or consistency with respect to the definition or use of the term “other financing sources” in FASAB documents or other guidance?**

SSA Response: We do not believe additional clarity is needed. Current FASAB guidance is adequate in defining the term “other financing sources.” Additionally, the revisions of the June 14, 2021 near-final draft of OMB Circular A-136 portray the elimination of the sub-categories “Budgetary Financing Sources” and “Other Financing Sources Nonexchange,” which provides simplification for presentation and reporting purposes on the SCNP and synchronization with FASAB, thereby enhancing clarity.

- Q3. Do you believe that the proposed Interpretation clarifies ambiguity regarding debt cancellation and would resolve any existing or anticipated issues? If not, please provide detail about other specific clarifications required regarding debt cancellations. Please also provide any other comments and other suggestions on the Interpretation. Please provide the rationale for your answer.**

SSA Response: We believe the proposed interpretation clarifies any ambiguity regarding debt cancellation, and should be sufficient to resolve current or potential future issues. We have no additional comments or suggestions, other than as noted in question 1, and we do not foresee any other issues.