



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”) Three-Year Plan.

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 by the Board to share our views.

FASAB's Three-Year Plan outlines a forward-thinking agenda designed to continuously serve the users of Federal financial information. The plan prioritizes projects that aim to address current issues while improving the transparency and usefulness of Federal financial reporting for its users. Key projects identified by the Board will focus on areas shown to have considerable interest by users, such as government land, intangible assets, public-private partnerships, management’s discussion and analysis, and the reexamination of existing standards. We recognize that the Board agreed to move the reporting entity reorganizations and abolishments project to the research agenda and develop a project prospectus. The FISC supports the Board’s decision and recommends that the Board accelerates the activities related to this project sooner than planned with the objective of issuing technical guidance for this topic. This would provide reporting entities experiencing reorganizations with the guidance needed to ensure reorganizations and abolishments are addressed in reporting agencies’ annual reports timely and consistently.

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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'.

Sherif R. Ettifa  
FISC Chair