



National Aeronautics and Space Administration  
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DATE: July 5, 2022

TO: FASAB ([fasab@fasab.gov](mailto:fasab@fasab.gov))

FROM: Eileen Detka, "Acting" Director for Policy & Compliance (Finance)

SUBJECT: Input on the Exposure Draft (ED) of a proposed Statement of Federal Financial Accounting Standards (SFFAS) titled *Omnibus Amendments: Technical Clarifications Addressing Lessee and Lessor Discount Rates and Sale-leasebacks*.

This proposed Statement would address certain ongoing areas of concern related to leases implementation that were not addressed in SFFAS 60, *Omnibus Amendments 2021*, including:

- clarifying the Board's original intent for discounting lease liabilities and receivables, which should result in a more consistent and comparable application of SFFAS 54, *Leases*, requirements; and
- clarifying the applicability of paragraphs 89-92 of SFFAS 54 to intragovernmental sale-leasebacks and the disclosure requirements applicable to them

**QFR 1** Do you agree or disagree with the proposed amendments to address discounting lease liabilities and receivables, as reflected in paragraphs 3-7 (amending par. 42, 47-48, and 59 of SFFAS 54), and the Board's basis for such proposals? Please provide the rationale for your answer.

**Agree.** The proposed amendments will provide greater consistency in the application of the standard with respect to the discount rate used, specifically, by eliminating the distinction between federal entities that may or may not have borrowing authority. Also, paragraphs 42A-42C provides clarifying guidance that will aid in determining the appropriate rate and the requirement to use a consistent methodology over multiple reporting periods.

**QFR 2** Do you agree or disagree with the proposed amendments to clarify the applicability of paragraphs 89-92 of SFFAS 54 to intragovernmental sale-leasebacks and the disclosure requirements applicable to them, as reflected in paragraphs 8-9, and the Board's basis for such proposals? Please provide the rationale for your answer.

**Agree.** The amendment to Footnote 11 clarifies the difference between sale-leaseback transactions for intragovernmental vs. those with the public and references the appropriate paragraphs of SFFAS 7. Also, the amendment to paragraph 92 is required to properly apply the relevant paragraphs of SFFAS 54 for the intragovernmental disclosure requirements.