



January 16, 2019

Wendy Payne, Executive Director
Federal Accounting Standards Advisory Board
Mail Stop 6K17V
441 G Street, NW – Suite 6814
Washington, DC 20548

Dear Ms. Payne:

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's (FASAB) Exposure Draft (ED) on the proposed Statement of Federal Financial Accounting Concepts, *Materiality: Amending Statement of Federal Financial Accounting Concepts (SFFAC) 1, Objectives of Federal Financial Reporting, and SFFAC 3, Management's Discussion and Analysis*.

The GWSCPA consists of approximately 3,300 members, and the FISC includes nearly 30 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.

Our responses to the ED questions are included below.

- Q1. The Board proposes materiality concepts providing a discussion of users, scope, and factors to consider in the federal government environment. Refer to paragraph 1.
- a. Do you agree or disagree with the proposed materiality section? Please provide the rationale for your answer.
 - b. Do you have any suggestions that would enhance the section?
- A1. The FISC agrees with the proposed materiality section. The proposed materiality concepts are generally consistent with the concepts used by other standard setters.
- Q2. The Board proposes placing the materiality concepts in Statement of Federal Financial Accounting Concepts 1, *Objectives of Federal Financial Reporting*. Refer to paragraph A14.

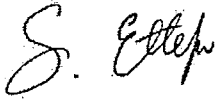
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Do you agree or disagree with the placement within concepts and specifically in SFFAC 1?
Please provide the rationale for your answer.

- A2. The FISC agrees with the placement within SFFAC 1. The FISC suggests that the Board considers the need to keep the materiality discussions that are currently included in other FASAB publications, including Standards for Federal Financial Accounting Standards No. 3, *Accounting for Inventory and Related Property*, once SFFAC 1 is amended to include this proposed materiality section.

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

Very truly yours,



Sherif R. Ettifa
FISC Chair