



April 22, 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 Standards (SFFAS), *Omnibus Amendments*.

The GWSCPA consists of approximately 3,200 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 is proposing to rescind Statement of Federal Financial Accounting Standards (SFFAS) 8, *Supplementary Stewardship Reporting*, in its entirety. SFFAS 8 designated the required supplementary stewardship information (RSSI) category for reporting stewardship investments; therefore, rescinding SFFAS 8 would eliminate the RSSI category and reduce confusion caused by the unique category designation. Refer to paragraph 2 and Appendix A, paragraphs A1-A3.

Do you agree or disagree with the Board's proposal to rescind SFFAS 8 and eliminate the RSSI category? Please provide the rationale for your answer.

A1. The FISC agrees with the Board's proposal to rescind SFFAS 8 and eliminate the RSSI category for the reasons stated in the ED.

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Q2. Reporting entities have broad responsibilities and are called upon to report their goals, accomplishments, and costs in management's discussion and analysis (MD&A). For some reporting entities, stewardship investments are significant and warrant discussion in the MD&A. The Board believes reporting entities will present information on stewardship investments in the basic financial statements and MD&A when such activities are significant. No guidance or requirements are proposed in this exposure draft (ED), but the Board may propose requirements in a later ED. Refer to Appendix A, paragraph A4.

Do you agree or disagree that guidance is needed in the future? If so, please provide your suggestions regarding future guidance. Please provide the rationale for your answer.

A2. The FISC recommends that the Board consider whether reporting information on stewardship investments in MD&A is needed since the Board's outreach to users, as stated in the ED, revealed that users prefer data on stewardship investments readily available from the Office of Management and Budget. If it continues to be the Board's view that reporting entities need to present information on stewardship investments in the MD&A, we recommend that the Board amend SFFAS 15, *Management's Discussion and Analysis*, concurrently with rescinding SFFAS 8 to provide such reporting requirements because SFFAS 15 does not currently have specific requirements to report this information. Without specific reporting requirements in SFFAS 15, reporting entities may not consistently present information on stewardship investments in MD&A.

Q3. SFFAS 54, *Leases: An Amendment of SFFAS 5, Accounting for Liabilities of the Federal Government, and SFFAS 6, Accounting for Property, Plant, and Equipment*, amended the lease standards in SFFAS 5 and 6, including references to "capital" and "operating" leases. SFFAS 5, 6 and 49 include references to language amended by SFFAS 54. These proposed amendments further clarify the revised lease accounting standards by eliminating outdated references used in the standards. Refer to paragraphs 3-12.

Do you agree or disagree with the proposed amendments to SFFAS 5, 6 and 49? Please provide the rationale for your answer.

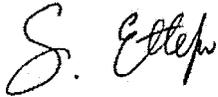
A3. The FISC agrees with the amendments to SFFAS 5, 6 and 49 for the reasons stated in the ED. We also recommend updating other parts of the FASAB handbook that continue to reference "capital leases" or "operating leases", as deemed appropriate. For example, footnote 19 in SFFAS 10, *Accounting for Internal Use Software*, and

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Appendix B of Technical Release 14, *Implementation Guidance on the Accounting for the Disposal of General Property, Plant, & Equipment*, continue to reference capital leases.

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 cursive script, appearing to read "S. Ettefa".

Sherif R. Ettefa
FISC Chair