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# Technical Release 21: Omnibus Technical Release Amendments 2022: Conforming Amendments

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## Status

Issued	September 6, 2022
Effective Date	Effective upon issuance.
Affects	Technical Releases 10, 11, 14, and 20 are amended.
Affected by	TR 23.

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## Summary

Listed below are FASAB pronouncements that require updates to Technical Releases (TRs):

- SFFAS 40, *Deferred Maintenance and Repairs: Definitional Changes*
- SFFAS 42, *Deferred Maintenance and Repairs: Amending Statements of Federal Financial Accounting Standards 6, 14, 29, and 32*
- SFFAS 44, *Accounting for Impairment of General Property, Plant, and Equipment Remaining in Use*
- SFFAS 54, *Leases*
- SFFAS 60, *Omnibus Amendments 2021: Leases-Related Topics*
- Interpretation 9, *Cleanup Cost Liabilities Involving Multiple Component Reporting Entities: An Interpretation of SFFAS 5 & 6*
- Technical Bulletin 2017-2, *Assigning Assets to Component Reporting Entities*

This TR provides conforming amendments to previously issued TRs to ensure the TRs are consistent with the aforementioned pronouncements.

Specifically, this TR provides conforming amendments to the following:

- TR 10, *Implementation Guidance on Asbestos Cleanup Costs Associated with Facilities and Installed Equipment*
- TR 11, *Implementation Guidance on Cleanup Costs Associated with Equipment*

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- TR 14, *Implementation Guidance on the Accounting for the Disposal of General Property, Plant & Equipment*
  - TR 20, *Implementation Guidance for Leases*
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## Materiality

The provisions of this Technical Release need not be applied to information if the effect of applying the provision(s) is immaterial.<sup>1</sup> A misstatement, including omission of information, is material if, in light of surrounding facts and circumstances, it could reasonably be expected that the judgment of a reasonable user relying on the information would change or be influenced by the correction or inclusion of the information. Materiality should be evaluated in the context of the specific reporting entity. Determining materiality requires appropriate and reasonable judgment in considering the specific facts, circumstances, size, and nature of the misstatement. Consequently, after quantitative and qualitative factors are considered, materiality may vary by financial statement, line item, or group of line items within an entity.

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<sup>1</sup>Refer to Statement of Federal Financial Accounting Concepts 1, *Objectives of Federal Financial Reporting*, chapter 7, titled *Materiality*, for a detailed discussion of the materiality concepts.

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## Technical Guidance

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### Scope

1. Readers of this Technical Release (TR) should first refer to the hierarchy of accounting standards in Statement of Federal Financial Accounting Standards (SFFAS) 34, *The Hierarchy of Generally Accepted Accounting Principles, Including the Application of Standards Issued by the Financial Accounting Standards Board*. This TR supplements the relevant accounting standards but is not a substitute for and does not take precedence over the standards.
2. FASAB has issued the following pronouncements that require updates to TRs:
  - SFFAS 40, *Deferred Maintenance and Repairs: Definitional Changes*
  - SFFAS 42, *Deferred Maintenance and Repairs: Amending Statements of Federal Financial Accounting Standards 6, 14, 29, and 32*
  - SFFAS 44, *Accounting for Impairment of General Property, Plant, and Equipment Remaining in Use*
  - SFFAS 54, *Leases*
  - SFFAS 60, *Omnibus Amendments 2021: Leases-Related Topics*
  - Interpretation 9, *Cleanup Cost Liabilities Involving Multiple Component Reporting Entities: An Interpretation of SFFAS 5 & 6*
  - Technical Bulletin 2017-2, *Assigning Assets to Component Reporting Entities*

This TR provides conforming amendments to the following TRs:

- TR 10, *Implementation Guidance on Asbestos Cleanup Costs Associated with Facilities and Installed Equipment*
- TR 11, *Implementation Guidance on Cleanup Costs Associated with Equipment*
- TR 14, *Implementation Guidance on the Accounting for the Disposal of General Property, Plant & Equipment*

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- TR 20, *Implementation Guidance for Leases*

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## Amendments to Existing Technical Releases

### Technical Release 10, Implementation Guidance on Asbestos Cleanup Costs Associated With Facilities And Installed Equipment

3. This paragraph rescinds paragraphs 1-8 (including all section titles, subsection titles, and the accompanying footnotes 1 through 5 contained within these sections) of TR 10, *Implementation Guidance on Asbestos Cleanup Costs Associated with Facilities and Installed Equipment*. This will ensure outdated references are removed and sections are properly located in the authoritative section. Pertinent text will be updated and placed in the Summary of the TR.
4. This paragraph amends the technical guidance section of TR 10 by inserting the subheading "scope" with paragraphs 8A-8B and footnote 5A directly under "technical guidance."

### Technical Guidance

#### Scope

8A. Readers of this Technical Release (TR) should first refer to the hierarchy of accounting standards in *Statement of Federal Financial Accounting Standards (SFFAS) 34, The Hierarchy of Generally Accepted Accounting Principles, Including the Application of Standards Issued by the Financial Accounting Standards Board*. This TR supplements the relevant accounting standards but is not a substitute for and does not take precedence over the standards.

8B. This guidance is limited to federal real property<sup>5A</sup> that contains any form of asbestos. It provides additional clarification of federal GAAP for identification and recognition of asbestos-related cleanup costs and a methodology for identifying and recognizing asbestos liabilities associated with federal properties.

<sup>5A</sup> [Paragraph 3 of TR 23, *Omnibus Technical Release Amendments 2024: Conforming Amendments to Technical Releases 10, 16, 20, and 21*, amended footnote 5A of TR 10.]

5. This paragraph amends the first sentence of paragraph 10 of TR 10 by inserting a new footnote 5B after the word "property" to reference recent pronouncements that should be considered:

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10. The following steps may be taken to identify real property<sup>5B</sup> that may contain asbestos.

<sup>5B</sup> Interpretation 9, *Cleanup Cost Liabilities Involving Multiple Component Reporting Entities: An Interpretation of SFFAS 5 & SFFAS 6*, provides clarification and guidance regarding cleanup cost liabilities for component reporting entities when the component reporting entity responsible for reporting on an asset during its useful life is different from the component reporting entity that will eventually be responsible for settling the liability for the cleanup cost of that asset. Technical Bulletin 2017-2, *Assigning Assets to Component Reporting Entities*, provides that assets may be assigned by a reporting entity to its component reporting entities on a rational and consistent basis.

6. This paragraph amends paragraph 13, including footnote 11, of TR 10 to refer to all relevant GAAP related to cleanup recognition:

Once the estimated asbestos cleanup cost associated with the removal, containment or disposal of the real property has been determined, the cost recognized and reported should be in accordance with ~~SFFAS 6~~ relevant GAAP.<sup>11</sup>

<sup>11</sup> See paragraphs 98 and 101, and Technical Bulletin 2006-1, paragraph 37. Relevant GAAP includes but is not limited to SFFAS 5, 6, 40, and 42; Interpretation 9; TB 2006-1, TB 2017-2; and related TRs.

7. This paragraph amends TR 10 by inserting a new paragraph 16 to include pronouncements that should be referenced to incorporate (1) the potential impacts to deferred maintenance and repairs (DM&R) estimates and loss of asset service utility or function and (2) applicable DM&R guidance and asset impairment (AI) guidance:

16. The guidance in SFFAS 40, *Deferred Maintenance and Repairs: Definitional Changes*, SFFAS 42, *Deferred Maintenance and Repairs: Amending Statements of Federal Financial Accounting Standards 6, 14, 29, and 32*, and SFFAS 44, *Accounting for Impairment of General Property, Plant, and Equipment Remaining in Use*, may also be relevant when considering the impact of asbestos cleanup on financial reporting.

8. This paragraph amends Diagram 1<sup>2</sup> of TR 10 by providing corresponding and consistent changes as noted in the paragraphs above:

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<sup>2</sup> Diagram 1 of TR 10 is part of the technical guidance and accordingly should be updated.

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- Box 13 - "Estimate cost of removal, containment or disposal and recognize in accordance with relevant GAAP<sup>SFFAS 6<sup>1</sup></sup>"
  - Footnote 1 - Replace with the following: "Relevant GAAP includes but is not limited to SFFAS 5, 6, 40, and 42; Interpretation 9; Technical Bulletin 2006-1, 2017-2; and related TRs."
  - Box 14 - Add footnote 3 at the end of the sentence as follows: Estimate and recognize any identifiable costs (e.g. survey cost).<sup>3</sup>
  - Insert footnote 3 immediately after footnote 2 to read as follows: "In estimating and recognizing identifiable costs, see SFFAS 44, *Accounting for Impairment of General Property, Plant, and Equipment Remaining in Use*, to determine if indicators of potential impairment exist."
9. This paragraph amends TR 10 by inserting a new paragraph 17 and footnote 12A to remind users that the non-authoritative sections are not updated:
17. The appendices (that include non-authoritative illustrations and examples) of TR 10 are not updated for amendments.<sup>12A</sup> Therefore, readers are cautioned to refer to the paragraphs above for guidance that could impact the accompanying non-authoritative illustrations and examples.
- <sup>12A</sup> The FASAB Handbook is updated annually and includes a status section directing the reader to any subsequent pronouncements that amend a pronouncement. For example, within the text of a Technical Release, the guidance sections are updated for changes. However, appendices are not updated to reflect subsequent changes. The reader can review the basis for conclusions of the amending pronouncements for the rationale for each amendment.
10. This paragraph further amends the technical guidance in TR 10 by inserting the subheading "effective date" with the following paragraph 18:

### **Effective Date**

18. This TR is effective upon issuance.

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## Technical Release 11, Implementation Guidance on Cleanup Costs Associated With Equipment

11. This paragraph rescinds paragraphs 1-7 (including all section titles, subsection titles, and the accompanying footnotes 1 through 5 contained within these sections) of TR 11, *Implementation Guidance on Cleanup Costs Associated with Equipment*. This will ensure outdated references are removed and sections are properly located in the authoritative section. Pertinent text will be updated and placed in the Summary of the TR.
12. This paragraph amends the technical guidance section of TR 11 by inserting the subheading "scope" with the following paragraph 7A directly under "technical guidance."

### Technical Guidance

#### Scope

7A. Readers of this Technical Release (TR) should first refer to the hierarchy of accounting standards in Statement of Federal Financial Accounting Standards (SFFAS) 34, *The Hierarchy of Generally Accepted Accounting Principles, Including the Application of Standards Issued by the Financial Accounting Standards Board*. This TR supplements the relevant accounting standards but is not a substitute for and does not take precedence over the standards.

13. This paragraph amends the subsection title "Cleanup Costs Associated with Equipment at Disposal" that precedes paragraph 8 by inserting footnote 5A, which replaces a footnote that was rescinded. The revised subsection title is as follows:

Cleanup Costs Associated with Equipment<sup>5A</sup> at Disposal

<sup>5A</sup>Equipment is defined in Appendix D.

14. This paragraph amends paragraph 8 of TR 11 by inserting a sentence at the beginning of paragraph 8 to ensure it refers to all relevant GAAP related to cleanup costs:

"Cleanup costs should be recognized in accordance with all relevant GAAP."

15. This paragraph further amends paragraph 8 of TR 11 by inserting two new sentences at the end of the paragraph (but before the example of practice) to reference recent pronouncements that should be considered:

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"Further, Interpretation 9, *Cleanup Cost Liabilities Involving Multiple Component Reporting Entities: An Interpretation of SFFAS 5 & SFFAS 6*, provides clarification and guidance regarding cleanup cost liabilities for component reporting entities when the component reporting entity responsible for reporting on an asset during its useful life is different from the component reporting entity that will eventually be responsible for settling the liability for the cleanup cost of that asset. Technical Bulletin 2017-2, *Assigning Assets to Component Reporting Entities*, provides that assets may be assigned by a reporting entity to its component reporting entities on a rational and consistent basis."

16. This paragraph replaces paragraph 13 (including footnote 13) of TR 11 to clarify the guidance.

In accordance with SFFAS 6, paragraph 93,<sup>13</sup> if such cleanup is an ongoing part of operations, the costs are to be accounted for in accordance with SFFAS 5, *Accounting for Liabilities of the Federal Government*, and are not subject to the recognition guidance provided in SFFAS 6, chapter 4 (par. 97 and 98). SFFAS 5 applies to all environmental liabilities not specifically covered in SFFAS 6, including cleanup resulting from accidents or when cleanup is an ongoing part of operations. Any accrued liability/payable and associated operating expense should be recognized in the period the cleanup occurs as part of ongoing operations.

<sup>13</sup> SFFAS 6, paragraph 93: Other cleanup costs, such as those resulting from accidents or where cleanup is an ongoing part of operations, are to be accounted for in accordance with liability standards and are not subject to the recognition guidance provided in this standard. This guidance does not apply to these other types of cleanup since the cleanup effort is not deferred until operation of associated PP&E ceases either permanently or temporarily.

17. This paragraph amends the last sentence of paragraph 14 of TR 11 by inserting footnote 13A after the words "routine hazardous waste disposal," replacing a footnote that was rescinded. The revised last sentence of paragraph 14 is as follows:

Example of Practice -- Cleanup Costs Associated with Equipment during Ongoing Operations: Determination of hazardous waste cleanup during ongoing operations of the equipment (routine hazardous waste disposal)<sup>13A</sup> at the time the equipment is being placed in service.

<sup>13A</sup> Routine hazardous waste disposal is defined in Appendix D.

18. This paragraph amends TR 11 by inserting paragraph 18 to include pronouncements that should be referenced to incorporate (1) the potential impacts to DM&R estimates and loss of asset service utility or function and (2) applicable DM&R guidance and asset impairment (AI) guidance:

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18. The guidance in SFFAS 40, *Deferred Maintenance and Repairs: Definitional Changes*, SFFAS 42, *Deferred Maintenance and Repairs: Amending Statements of Federal Financial Accounting Standards 6, 14, 29, and 32*, and SFFAS 44, *Accounting for Impairment of General Property, Plant, and Equipment Remaining in Use*, may also be relevant

- when defining, measuring, and reporting estimated cleanup costs that are considered deferred and
- when considering the existence of any potential asset impairment indicators.

19. This paragraph amends Diagram 1<sup>3</sup> of TR 11 by providing corresponding and consistent changes as noted in the paragraphs above:

- Amend the title of Diagram 1 as follows: Recognizing Environmental Liabilities for Equipment Disposal in Compliance with relevant GAAP ~~Technical Release 2 and SFFAS 1, 5 and 6~~
- Amend language in the box for recognizing the liability: "Recognize estimate for environmental liability on financial statements in accordance with SFFAS 6 relevant GAAP, including but not limited to SFFAS 5, 6, 40, 42, and 44; Interpretation 9; Technical Bulletin 2006-1, 2017-2; and applicable TRs."

20. This paragraph amends TR 11 by inserting paragraph 19 and footnote 14A to remind users that the non-authoritative sections are not updated:

19. The appendices (that include non-authoritative illustrations and examples) of TR 11 are not updated for amendments.<sup>14A</sup> Therefore, readers are cautioned to refer to the paragraphs above for guidance that could impact the accompanying non-authoritative illustrations and examples.

<sup>14A</sup>The FASAB Handbook is updated annually and includes a status section directing the reader to any subsequent pronouncements that amend a pronouncement. For example, within the text of a Technical Release, the guidance sections are updated for changes. However, appendices are not updated to reflect subsequent changes. The reader can review the basis for conclusions of the amending pronouncements for the rationale for each amendment.

21. This paragraph further amends the technical guidance in TR 11 by inserting the subheading "effective date" with the following paragraph 20:

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<sup>3</sup>Diagram 1 of TR 11 is part of the technical guidance and accordingly should be updated.

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## Effective Date

20. This TR is effective upon issuance.

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## Technical Release 14, Implementation Guidance On The Accounting for the Disposal of General Property, Plant & Equipment

22. This paragraph rescinds paragraphs 1-4 (including all section titles and subsection titles) of Technical Release 14, *Implementation Guidance on the Accounting for the Disposal of General, Property, and Equipment*. This will ensure outdated references are removed and sections are properly located in the authoritative section. Pertinent text will be updated and placed in the Summary of the TR.
23. This paragraph amends the technical guidance section of TR 14 by inserting the subheading "scope" with the following paragraph 4A directly under "technical guidance."

## Technical Guidance

### Scope

4A. Readers of this Technical Release (TR) should first refer to the hierarchy of accounting standards in Statement of Federal Financial Accounting Standards (SFFAS) 34, *The Hierarchy of Generally Accepted Accounting Principles*, Including the *Application of Standards Issued by the Financial Accounting Standards Board*. This TR supplements the relevant accounting standards but is not a substitute for and does not take precedence over the standards.

24. This paragraph amends paragraph 5 of TR 14 by inserting (1) footnote A after "general PP&E" to reference Technical Bulletin 2017-2, *Assigning Assets to Component Reporting Entities*, and (2) two sentences (including footnote B) after the first sentence to reference requirements contained at SFFAS 40, *Deferred Maintenance and Repairs: Definitional Changes*; SFFAS 42, *Deferred Maintenance and Repairs: Amending Statements of Federal Financial Accounting Standards* 6, 14, 29, and 32; and SFFAS 44, *Accounting for Impairment of General Property, Plant, and Equipment Remaining in Use*.

5. In accordance with SFFAS 6 paragraph 38, "in the period of disposal, retirement, or removal from service, general PP&E<sup>A</sup> shall be removed from the asset accounts along with associated accumulated depreciation/amortization." When G-PP&E assets are disposed of, retired, or removed from service, deferred maintenance and repair (DM&R) estimates as defined and required by SFFAS 40 and SFFAS 42, respectively, should be re-estimated to the extent such estimated costs are related to the G-PP&E assets disposed of, retired, or

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removed from service.<sup>B</sup> Additionally, to the extent any portion of a G-PP&E asset is not disposed of, retired, or otherwise continues to remain in service, SFFAS 44 should be consulted to ascertain whether partial impairments should be accounted for and reported, including additional DM&R information when necessary, such as changes in DM&R exclusions.

<sup>A</sup>Technical Bulletin 2017-2, Assigning Assets to Component Reporting Entities, provides that assets may be assigned by a reporting entity to its component reporting entities on a rational and consistent basis."

<sup>B</sup>For example, in situations where DM&R costs are estimated for an asset group and a component (or components) of that group is disposed of, retired, or removed from service, the DM&R re-estimate should be performed only for the assets remaining in the group.

25. This paragraph amends the first sentence of paragraph 6 of TR 14 by inserting footnote 1A after "cleanup costs" to reference Interpretation 9, *Cleanup Cost Liabilities Involving Multiple Component Reporting Entities: An Interpretation of SFFAS 5 & SFFAS 6*:

6. Additionally, SFFAS 6 provides requirements for recognition and measurement of disposal related cleanup costs.<sup>1A</sup>

<sup>1A</sup>Interpretation 9, *Cleanup Cost Liabilities Involving Multiple Component Reporting Entities: An Interpretation of SFFAS 5 & SFFAS 6*, provides clarification and guidance regarding cleanup cost liabilities for component reporting entities when the component reporting entity responsible for reporting on an asset during its useful life is different from the component reporting entity that will eventually be responsible for settling the liability for the cleanup cost of that asset.

26. This paragraph amends paragraph 7 of TR 14 by inserting a sentence at the end of the paragraph referring to SFFAS 44, *Accounting For Impairment Of General Property, Plant, And Equipment Remaining In Use*:

The following section provides further clarification and guidance to the requirements stated in SFFAS 6, paragraphs 38, 39, 97, and 98 as those paragraphs relate to "removal from service." The terms "disposal" and "retirement" are used in the above referenced SFFAS 6 paragraphs and are intended to describe G-PP&E disposals that are permanent in nature. However, "removal from service" may or may not be permanent. The paragraph below defines the term "removal from service", as referenced in SFFAS 6, and further discusses the differences between other than permanent and permanent removal from service. SFFAS 44, *Accounting For Impairment Of General Property, Plant, And Equipment Remaining In Use*, provides guidance on potential impairment for G-PP&E that (1) is other

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than permanently removed from service or (2) remains in service but with a decline in service utility that is expected to be permanent.

27. This paragraph amends the last sentence of paragraph 10 of TR 14 by revising to ensure it refers to all relevant GAAP:

Likewise, in the case of G-PP&E cleanup costs, if only one of the two business events has occurred, permanent removal from service has not occurred (i.e., considered other than permanent removal) and, any cleanup costs associated with disposal, closure, and/or shutdown should continue to accumulate as a liability in accordance with ~~SFFAS 6, paragraphs 97 and 98~~ relevant GAAP.

28. This paragraph amends paragraph 10 of TR 14 by (1) deleting the statement that no change in G-PP&E reported value is in order and (2) referencing SFFAS 44 for potential impairment for G-PP&E not permanently removed from service that could result in a change to G-PP&E reported value:

10. Two business events are necessary for the permanent removal from service:

1. Asset's use is terminated, and
2. There is documented evidence of management's decision to permanently remove the asset from service.

If only one of the two business events has occurred, permanent removal from service has not occurred (i.e., considered other than permanent removal). However, in accordance with SFFAS 44, Accounting For Impairment Of General Property, Plant, And Equipment Remaining In Use, and there is no there could be a change in the G-PP&E reported value for other than permanently removed G-PP&E if an impairment indicator exists, such as changes in the manner or duration of use of G-PP&E or G-PP&E idled or unserviceable for excessively long periods and depreciation continues. Depreciation continues on such G-PP&E to the extent not impaired.

Likewise, in the case of G-PP&E cleanup costs, if only one of the two business events has occurred, permanent removal from service has not occurred (i.e., considered other than permanent removal) and, any cleanup costs associated with disposal, closure, and/or shutdown should continue to accumulate as a liability in accordance with ~~SFFAS 6, paragraphs 97 and 98~~relevant GAAP.

29. This paragraph amends TR 14 by adding paragraph 18 and footnote 8A to remind users that the non-authoritative sections are not updated:

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18. The appendices (that include non-authoritative illustrations and examples) of TR 14 are not updated for amendments.<sup>8A</sup> Therefore, readers are cautioned to refer to the paragraphs above for guidance that could impact the accompanying non-authoritative illustrations and examples.

<sup>8A</sup>The FASAB Handbook is updated annually and includes a status section directing the reader to any subsequent pronouncements that amend a pronouncement. For example, within the text of a Technical Release, the guidance sections are updated for changes. However, appendices are not updated to reflect subsequent changes. The reader can review the basis for conclusions of the amending pronouncements for the rationale for each amendment.

30. This paragraph further amends the technical guidance in TR 14 by inserting the subheading "effective date" with the following paragraph 19.

#### **Effective Date**

19. This TR is effective upon issuance.

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### **Technical Release 20, Implementation Guidance for Leases**

31. This paragraph amends paragraph 17 of TR 20 by revising the paragraph numbers referenced to conform to SFFAS 54, as amended by SFFAS 60:

**17. Paragraphs 37.b and 54.e of SFFAS 54 require disclosures of "annual lease expense." Since the term is not defined elsewhere, what types of lease expenses are included in these disclosures?**

For intragovernmental leases, disclosures of annual lease expenses by lessees (par. 37.b) include amounts incurred during the fiscal year as expenses in accordance with paragraphs 27, ~~and 31,~~ and -36.

For right-to-use lease assets, disclosures of annual lease expenses by lessees (par. 54.e) include amounts incurred during the fiscal year for the amortization of the lease assets, as initially capitalized in accordance with paragraph 49, and interest expense.

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## EFFECTIVE DATE

32. This TR is effective upon issuance..

The provisions of this Statement need not be applied to information if the effect of applying the provision(s) is immaterial. Refer to Statement of Federal Financial Accounting Concepts 1, *Objectives of Federal Financial Reporting*, chapter 7, titled *Materiality*, for a detailed discussion of the materiality concepts

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## Appendix A: Basis for Conclusions

This appendix discusses some factors considered significant by Committee members in reaching the conclusions in this Technical Release. It includes the reasons for accepting certain approaches and rejecting others. Individual members gave greater weight to some factors than to others. The guidance enunciated in this Technical Release—not the material in this appendix—should govern the accounting for specific transactions, events, or conditions.

This Technical Release may be affected by later Statements or other pronouncements. The Handbook is updated annually and includes a status section directing the reader to any pronouncement that changed this Technical Release. Within the text of the Technical Release, the guidance sections are updated for changes. However, this appendix will not be updated to reflect subsequent changes. The reader can review the basis for conclusions of the amending Statements or other pronouncements for the rationale for each amendment.

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### Project History

A1. FASAB issued the below pronouncements that require assessing and updating TRs:

- SFFAS 40, *Deferred Maintenance and Repairs: Definitional Changes*
- SFFAS 42, *Deferred Maintenance and Repairs: Amending Statements of Federal Financial Accounting Standards 6, 14, 29, and 32*
- SFFAS 44, *Accounting for Impairment of General Property, Plant, and Equipment Remaining in Use*
- Interpretation 9, *Cleanup Cost Liabilities Involving Multiple Component Reporting Entities: An Interpretation of SFFAS 5 & 6*
- Technical Bulletin 2017-2, *Assigning Assets to Component Reporting Entities*

A2. It is important to make conforming amendments to ensure TRs are consistent with other pronouncements. The Committee also recognizes that conforming amendments are important to incorporate because users rely on the technical guidance to assist with implementation efforts.

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## Amendments to Existing Technical Releases

- A3. This TR provides conforming amendments to previously issued TRs to ensure TR guidance is consistent with other pronouncements. The amendments conform the TRs to ensure users are reminded of provisions of the aforementioned pronouncements and that they should be applied when appropriate.
- A4. This TR provides conforming amendments to the following documents:
- TR 10, *Implementation Guidance on Asbestos Cleanup Costs Associated with Facilities and Installed Equipment*
  - TR 11, *Implementation Guidance on Cleanup Costs Associated with Equipment*
  - TR 14, *Implementation Guidance on the Accounting for the Disposal of General Property, Plant & Equipment*
  - TR 20, *Implementation Guidance for Leases*
- A5. The Committee believes that the amendments bring the technical guidance up to date to reflect the current pronouncements. For example, the amendment to paragraph 17 of TR 20 conforms paragraph references to SFFAS 54, as amended by SFFAS 60.
- A6. The Committee concluded that it is important to remind users (as detailed in the preamble to the Appendix) that non-authoritative sections would not be updated. To help ensure this is clear, language was added to the amended TRs explaining appendices (that include non-authoritative illustrations and examples) are not updated for amendments and readers should refer to the paragraphs in the amended guidance that could impact the accompanying non-authoritative illustrations and examples.

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## Summary of Outreach Efforts and Responses

- A7. The Accounting and Auditing Policy Committee (AAPC) issued the exposure draft (ED), *Omnibus Technical Release Amendments 2022: Conforming Amendments*, on March 30, 2022, with comments requested by May 31, 2022.
- A8. Upon release of the ED, FASAB notified constituents through the FASAB website and listserv, the Federal Register, and FASAB newsletter. FASAB also provided news releases to its press contacts, including various news organizations and committees of professional

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associations generally commenting on EDs in the past. To encourage responses, a reminder notice was provided to FASAB's listserv near the comment deadline.

- A9. The AAPC received twelve comment letters from preparers, users of federal financial information, and professional associations. The AAPC considered responses to the ED at its meeting on June 28, 2022. The AAPC did not rely on the number in favor of or opposed to a given position. The AAPC considered each response and weighed the merits of the points raised.
- A10. The majority of respondents generally agreed with the Technical Release. Specifically, the respondents agreed with the amendments and that the TR clarifies the technical guidance. Certain respondents provided minor edits or clarifications that were carefully considered by the Committee and incorporated as appropriate.

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## AAPC & BOARD APPROVAL

- A11. The TR was approved by the AAPC for release to FASAB for issuance. The Board has reviewed this TR and a majority of its members do not object to its issuance. Written ballots are available for public inspection at the FASAB office.

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## Appendix B: Abbreviations

AAPC	Accounting and Auditing Policy Committee
DM&R	Deferred Maintenance and Repairs
ED	Exposure Draft
PP&E	Property, Plant, and Equipment
SFFAS	Statement of Federal Financial Accounting Standards
TB	Technical Bulletin
TR	Technical Release