

**TECHNICAL CLARIFICATIONS:
SFFAS 59, *ACCOUNTING AND
REPORTING OF GOVERNMENT LAND***

Technical Bulletin 2025-X

Exposure Draft

Written comments are requested by July 18, 2025

July 3, 2025

THE FEDERAL ACCOUNTING STANDARDS ADVISORY BOARD

The Secretary of the Treasury, the Director of the Office of Management and Budget (OMB), and the Comptroller General of the United States established the Federal Accounting Standards Advisory Board (FASAB or "the Board") in October 1990. FASAB is responsible for promulgating accounting standards for the United States government. These standards are recognized as generally accepted accounting principles (GAAP) for the federal government.

Accounting standards are typically formulated initially as a proposal after considering the financial and budgetary information needs of citizens (including the news media, state and local legislators, analysts from private firms, academe, and elsewhere), Congress, federal executives, federal program managers, and other users of federal financial information. FASAB publishes the proposed standards in an exposure draft for public comment. In some cases, FASAB publishes a discussion memorandum, invitation for comment, or preliminary views document on a specific topic before an exposure draft. A public hearing is sometimes held to receive oral comments in addition to written comments. The Board considers comments and decides whether to adopt the proposed standards with or without modification. After review by the three officials who sponsor FASAB, the Board publishes adopted standards in a Statement of Federal Financial Accounting Standards. The Board follows a similar process for Statements of Federal Financial Accounting Concepts, which guide the Board in developing accounting standards and formulating the framework for federal accounting and reporting.

Additional background information and other items of interest are available at www.fasab.gov:

- [Memorandum of Understanding](#) among the Government Accountability Office, the Department of the Treasury, and the Office of Management and Budget, on Federal Government Accounting Standards and a Federal Accounting Standards Advisory Board
- [Mission statement](#)
- [Documents for comment](#)
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July 3, 2025

TO: ALL WHO USE, PREPARE, AND AUDIT FEDERAL FINANCIAL INFORMATION

Your comments on the exposure draft of a proposed Technical Bulletin, *Technical Clarifications: SFFAS 59: Accounting and Reporting of Government Land*, are requested. Specific questions for your consideration appear on page 3, but you are welcome to comment on any aspect of this proposal. If you do not agree with the proposed approach, your response will be most helpful to the Board if you explain the reasons for your positions and any alternatives you propose.

Responses are requested by July 18, 2025.

All comments received by FASAB are considered public information. Those comments may be posted to [FASAB's website](#) and will be included in the project's public record.

Please provide your comments by email to land@fasab.gov. We will confirm receipt of your comments. If you do not get a confirmation, please contact our office at (202) 512-7350 to determine if your comments were received. If you are unable to email your responses, please call (202) 512-7350 to make alternate arrangements.

We may hold one or more public hearings on any exposure draft. No hearing has yet been scheduled for this exposure draft. FASAB will publish notice of the date and location of any public hearing on this document in the Federal Register and in its newsletter.

Sincerely,

Monica R. Valentine

Monica R. Valentine
Executive Director

EXECUTIVE SUMMARY

WHAT GUIDANCE IS BEING PROPOSED?

This Technical Bulletin (TB) would clarify existing standards for the accounting and reporting of government land in accordance with Statement of Federal Financial Accounting Standards (SFFAS) 59, *Accounting and Reporting of Government Land*. Guidance is needed to clarify the existing accounting and reporting requirements regarding the unique characteristics of government land holdings that have arisen during the fiscal year 2022-2024 required supplementary information transition period.

Specifically, this TB would clarify the following:

- The categorization of general property, plant, and equipment (G-PP&E) land and stewardship land is based on intent or the intended purpose of why the entity is currently managing/holding the land. The sub-categorization, however, is based on predominant use.
- Preparer flexibility concerning the accounting and reporting of non-outer continental shelf submerged land as well as ownership and related acquisition assertions.
- The accounting and reporting of land improvements remain consistent with SFFAS 6, *Accounting for Property, Plant, and Equipment*.
- G-PP&E permanent land rights are to be expensed as incurred.
- Preparer flexibility concerning ownership and related acquisition assertions by incorporating into this TB concepts from paragraphs 81-83 (Supporting Documentation) and paragraph 85 (Methodology for Developing Supporting Documentation) of Technical Release 9, *Implementation Guide for Statement of Federal Financial Accounting Standards 29: Heritage Assets and Stewardship Land*.

This TB would facilitate consistent accounting and reporting of government land in accordance with generally accepted accounting principles while also reducing preparer burden and improving user benefits.

MATERIALITY

The provisions of this proposed TB would not need to be applied to information if the effect of applying the provision(s) is immaterial.¹ 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.

¹Refer 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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QUESTIONS FOR RESPONDENTS

The Federal Accounting Standards Advisory Board (FASAB or “the Board”) encourages you to become familiar with all proposals in the Technical Bulletin (TB) before responding to the questions for respondents (QFR) in this section. In addition to the questions below, the Board also welcomes your comments on other aspects of the proposed TB. Because FASAB may modify the proposals before a final TB is issued, it is important that you comment on proposals that you favor as well as any that you do not favor. The Board especially appreciates comments that include the reasons for your views.

The Board believes that this proposal would improve federal financial reporting and contribute to federal financial reporting objectives. The Board has considered the perceived costs associated with this proposal. In responding, please consider the expected benefits and perceived costs and communicate any concerns that you may have regarding implementing this proposal.

The questions in this section are available for your use at <https://www.fasab.gov/documents-for-comment/>. Your responses should be sent to land@fasab.gov. If you are unable to respond by email, please contact us at (202) 512-7350.

All responses are requested by July 18, 2025.

QFR1. The proposed TB would clarify that categorizing general property, plant, and equipment (G-PP&E) land and stewardship land is based on intent or intended purpose, whereas the sub-categorization is based on predominant use. The determining factor when categorizing land between G-PP&E and stewardship is why the entity is currently managing/holding the land as opposed to its actual predominant use during the reporting period. Refer to paragraphs 5 and 6 and paragraph A4 in the basis for conclusions.

Do you agree or disagree? Please provide the rationale for your answer.

QFR2. The proposed TB would clarify that the reporting of non-outer continental shelf (OCS) submerged estimated acreage is optional and that the preparer has flexibility concerning the accounting and reporting of such land. Specifically, preparers have the option to either include or exclude non-OCS estimated acreage in the notes as part of the overall reported acreage estimates. If the entity has non-OCS submerged land, the entity should (1) disclose its policy for including or excluding this land from acreage estimates and (2) describe its mission related to such lands. Refer to paragraphs 7 and 8, paragraph A5 in the basis for conclusions, and appendix C.

Do you agree or disagree? Please provide the rationale for your answer.

QFR3. The proposed TB would clarify that the accounting and reporting of land improvements remains consistent with Statement of Federal Financial Accounting Standards 6, *Accounting for Property, Plant, and Equipment*. That is, land improvements would continue to be reported as G-PP&E after land acreage transitions to the notes. Refer to paragraphs 9-11 and paragraph A6-A9 in the basis for conclusions.

Do you agree or disagree? Please provide the rationale for your answer.

QFR4. The proposed TB would clarify that all (G-PP&E and stewardship) permanent land rights are to be expensed as incurred. Refer to paragraphs 12 and 13 and paragraph A10-A11 in the basis for conclusions.

Do you agree or disagree? Please provide the rationale for your answer.

QFR5. The proposed TB would clarify that ownership and related acquisition assertions can be supported by non-traditional documentation. For example, alternative methods, such as satellite imagery, expert analysis, legal precedents, and testimonies from land historians or long-established local communities, can help reconstruct ownership history and confirm the legitimacy of land claims. Additionally, practitioners may review land surveys, geological data, or archival government correspondence to corroborate acquisition details. Refer to paragraphs 14-17 and paragraph A12-A18 in the basis for conclusions.

Do you agree or disagree? Please provide the rationale for your answer.

QFR6. The proposed TB would incorporate concepts regarding ownership in paragraphs 81-83 (Supporting Documentation) and paragraph 85 (Methodology for Developing Supporting documentation) of Technical Release 9, *Implementation Guide for Statement of Federal Financial Accounting Standards 29: Heritage Assets and Stewardship Land*. Refer to paragraphs 14-17 and paragraph A12-A18 in the basis for conclusions.

Do you agree or disagree? Please provide the rationale for your answer.

QFR7. Do you wish to comment on any other aspects of this proposal?

PROPOSED TECHNICAL GUIDANCE

SCOPE

1. **What reporting entities are affected by this Technical Bulletin (TB)?**
2. This TB applies to reporting entities that present general purpose federal financial reports in conformance with generally accepted accounting principles, as defined by paragraphs 5 through 8 of 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*.
3. **What accounting practices are addressed in this TB?**
4. This TB provides clarifying guidance to the already existing guidance for the accounting and reporting of government land. Reporting guidance for government land is currently addressed in paragraphs 6 and 7 (general property, plant, and equipment [G-PP&E] land), paragraphs 8-10 (stewardship land), paragraph 11 (government-wide stewardship land) and paragraph 12 (government-wide G-PP&E land) of SFFAS 59, *Accounting for Government Land*. In accordance with paragraph A39 of the basis for conclusions in SFFAS 59, the Federal Accounting Standards Advisory Board (FASAB or “the Board”) committed to addressing post-implementation issues and completing its assessment during fiscal year 2025, as appropriate. This TB addresses those reporting issues determined to be within the scope of the Statement and within the Board’s authority.

G-PP&E LAND AND STEWARDSHIP LAND CATEGORIZATIONS

5. **How can entities determine the classification of land and permanent land rights between G-PP&E land and stewardship land?**
6. G-PP&E land and stewardship land are asset categories based on an entity's intended use of the land.² As such, the determining factor when categorizing land between G-PP&E and stewardship is the intent or intended purpose of why the entity is currently managing/holding the land as opposed to its actual predominant use during the reporting period. The TB neither anticipates nor requires that entities conduct an annual or other periodic survey solely for the purpose of identifying changes to the intent or intended purpose of their land holdings. Existing processes should serve to identify a change in the intent or intended purpose of holding the property—whether transitioning from G-PP&E land to stewardship land or vice versa. Examples of these changes include changes in entity mission requirements, effects of significant events, or changes in circumstances. The results of such processes may serve as the basis for identifying any changes in intent or intended purpose.

² Refer to par. 17 of SFFAS 6, *Accounting for Property, Plant, and Equipment*, and par. 33 of SFFAS 29, *Heritage Assets and Stewardship Land*.

7. **How should entities report submerged land? Should entities report submerged land as part of acreage estimates or disclose it as part of a note?**
8. FASAB guidance defines “land” as the solid part of the surface of the earth.³ Excluded from the definition are the natural resources (that is, depletable resources, such as mineral deposits and petroleum; renewable resources, such as timber; and the outer-continental shelf resources) related to land. In recognition of cost-benefit and preparer-burden considerations, SFFAS 59 provides the preparer with flexibility in reporting **non-outer continental shelf (OCS) submerged land**.⁴ Preparers have the option to include or exclude non-OCS estimated acreage in the notes as part of the overall reported acreage estimates. If the entity has non-OCS submerged land, the entity should (1) disclose its policy for including or excluding this land from acreage estimates and (2) describe its mission related to such lands. Refer to footnote 46.1b in paragraph 45A.c. of SFFAS 6, *Accounting for Property, Plant, and Equipment*, and footnote 21.1b of paragraph 40.c. in SFFAS 29, which pertains to the aggregation and assignment of G-PP&E land and stewardship land.⁵ The reporting entity should determine how to group land, including non-OCS submerged land, and permanent land rights based on the entity's mission, land usage, and asset management. This process can also be adopted to estimate total acreage and identify the predominant use of the land to ensure accurate classification and reporting.
9. **How should reporting entities account for land improvements pursuant to SFFAS 59?**
10. Practitioners should refer to the guidance in chapter 2 of SFFAS 6. If the land improvements meet the criteria to be categorized as G-PP&E, then they would be considered depreciable property, plant, and equipment (PP&E). Such land improvements produce long-term benefits that should be charged to expense through depreciation over their useful lives. Examples include dams, levees, and irrigation/drainage systems. Such land improvements would continue to be reported as PP&E after land acreage transitions to the notes to the financial statements.
11. Land improvements not meeting the SFFAS 6 capitalization requirements should be expensed and not capitalized. Examples include beautification efforts or landscaping activities, general upkeep to include routine maintenance, and repairs such as fixing existing structures without significantly upgrading them or altering their functionality.
12. **How should reporting entities account for permanent G-PP&E land rights pursuant to SFFAS 59?**
13. As stated at paragraph 4 of SFFAS 59, permanent land rights are not to be capitalized and should be expensed as incurred. As such, any recorded permanent land rights should be de-recognized upon implementation of SFFAS 59. Land rights that are for an unspecified

³ SFFAS 29, par. 34 and Appendix E Consolidated Glossary.

⁴ Terms defined in the Glossary are shown in bold-face the first time they appear.

⁵ The level of aggregation of land and permanent land rights used to determine predominant use should be determined by the preparer considering the entity's mission, types of land use, and how it manages the assets.

period of time or unlimited duration are considered permanent land rights. Those land rights that are for a specified period of time or limited duration are considered temporary land rights. SFFAS 59 did not change the accounting or reporting requirements for temporary land rights, which should be capitalized and reported on the balance sheet. In most cases, permanent land rights such as easements, water rights, or mineral rights are inseparable from the associated land that resulted in the land rights, and, as such, the value of such rights are measured as part of the cost of the land. Therefore, the intent of SFFAS 59 is not to require a separate measurement of the cost of permanent land rights from its associated land, as it is impractical and creates unnecessary preparer burden.

OWNERSHIP AND SUPPORTING DOCUMENTATION

14. **How does an entity support its management assertion regarding ownership when there may be de facto ownership (that is, the federal government controls/manages the acreage uncontested for decades or centuries) without title documentation?**
15. Although the measurement basis for land is acreage, reasonable estimates may be used to establish land acreage and predominant use. As explained in paragraph A35 of the basis for conclusions in SFFAS 59, entity estimates can be based on different underlying sources of data with different measurement and/or mapping methods. They can be applied at an aggregation level (for example, by national park or reserve, regional/district office, or topography/land cover).
16. This TB incorporates the requirements from paragraph 85 of Technical Release (TR) 9, *Implementation Guide for Statement of Federal Financial Accounting Standards 29: Heritage Assets and Stewardship Land*. These should be followed when developing supporting documentation. These requirements, which have been updated to include G-PP&E land and exclude heritage assets, follow.
17. Methodology for Developing Supporting Documentation – Ideally, agencies should have a historical file evidencing ownership of their land holdings (G-PP&E and stewardship). When original property records (or other documentation like deeds, tax assessments, or insurance records) do not exist, a methodology should be employed to develop alternative documentation⁶ to support management's assertions of federal ownership. For example, maintenance or renovation contracts, historical maintenance records or a history of payment of invoices, minutes of meetings, historical databases, surveys of land records, a history of past/historical practices (like establishing de facto ownership), or other relevant sources of information may provide acceptable alternative evidence of government ownership. Therefore, it is important that a reporting entity develop and document its policy regarding factors and criteria used to evaluate supporting documentation in determining ownership.

⁶ Alternative methods, such as satellite imagery, expert analysis, legal precedents, and testimonies from land historians or long-established local communities, can help reconstruct ownership history and confirm the legitimacy of land claims. Additionally, practitioners may review third-party land surveys such as from state/local governments or private entities, geological data supporting territorial claims, or archival government correspondence to corroborate historical acquisition details. This approach ensures a comprehensive assertion and attestation process that upholds accuracy, accountability, and compliance with the SFFAS 59 requirements.

EFFECTIVE DATE

18. The requirements of this TB are effective upon issuance.

The provisions of this Technical Bulletin 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.

APPENDIX A: BASIS FOR CONCLUSIONS

The Federal Accounting Standards Advisory Board (FASAB) has authorized its staff to prepare Technical Bulletins to provide timely guidance on certain financial accounting and reporting problems, in accordance with the Board's Rules of Procedures, as amended and restated through August 2023, and the procedures described in FASAB Technical Bulletin 2000-1, *Purpose and Scope of FASAB Technical Bulletins and Procedures for Issuance*. The provisions of Technical Bulletins need not be applied to immaterial items.

This appendix discusses some factors considered significant by staff in reaching the conclusions in this Technical Bulletin. It includes the reasons for accepting certain approaches and rejecting others. Some factors were given greater weight than other factors. The guidance enunciated in the proposed technical guidance section—not the material in this appendix—would govern the accounting for specific transactions, events, or conditions.

This TB may be affected by later Statements or pronouncements. The FASAB Handbook is updated annually and includes a status section directing the reader to any pronouncement that affects this TB. Within the text of the TB, the authoritative 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 amending Statements or other pronouncements for the rationale for each amendment.

PROJECT HISTORY

- A1. The Board issued SFFAS 59, *Accounting and Reporting of Government Land*, in July 2021. SFFAS 59 is intended to ensure consistent accounting treatment and reporting for federal land and notes the importance of having accounting standards that provide relevant, reliable, and consistent information concerning federal land. It was the Board's intent that the information required by SFFAS 59 transition to basic information in fiscal year (FY) 2026 after being reported as required supplementary information (RSI) for four years. Given the potential implementation challenges related to SFFAS 59, the Board agreed to monitor its implementation and assess the need for action to address any preparation and auditing challenges prior to transition of the RSI requirements to the notes in FY 2026. As more fully discussed in paragraph A39 of SFFAS 59, the Board agreed to a four-year transition period (FY 2022-FY 2025) to allow time for reporting entities to develop and establish policies and procedures and to validate that the required information is independently verifiable or auditable. Accordingly, in November 2023, the Government Accountability Office (GAO) requested auditors of significant reporting entities reporting under FASAB standards to perform certain audit procedures in the FY 2024 reporting period to identify any verifiability issues.
- A2. At the February 2025 meeting, GAO briefed the Board on the FY 2024 results of the GAO Land Procedures received from entity auditors concerning the application of audit procedures in relation to SFFAS 59 reporting requirements. The briefing outlined certain areas that might require the Board's attention and consideration, ensuring adherence primarily to the SFFAS 59 reporting requirement to de-recognize land commencing in FY 2026. The following nine auditor issues were identified at the February meeting: (1)

submerged land; (2) ownership; (3) co-ownership or joint management; (4) predominant use; (5) permanent land rights; (6) land improvements; (7) G-PP&E land and stewardship land definitions; (8) TR 9; and (9) clarifying materiality. Staff was also notified of an additional implementation matter—acreage estimates—for the Board to address.

- A3. At the April 2025 meeting, the Board continued its assessment of the auditor issues brought up by GAO. GAO indicated that it had identified additional issues other than those previously outlined at the February meeting that could require the Board's attention. These additional issues primarily related to challenges in certain entities' ability to provide sufficient support for reported land acreage, including predominant use.

Land Definitions

- A4. During the Board's development of the reporting requirements of SFFAS 59, it spent a significant amount of time clarifying the G-PP&E land and stewardship land definitions. For example, a notable clarification included that stewardship land used or acquired for or in connection with items of G-PP&E would not lose its distinction as stewardship land. During deliberations, some task force members noted that a single land category would, in theory, simplify reporting; however, others were concerned that the existing distinction between G-PP&E land and stewardship land would be lost. They were concerned that this could adversely affect current measurement and recognition requirements for stewardship land with no clear benefits, as well as adversely affect Congressional appropriations. As a result, the Board agreed to retain the G-PP&E land and stewardship land distinctions. Furthermore, the Board believes that SFFAS 6 and this TB contains sufficient guidance to assist practitioners in differentiating between G-PP&E land and stewardship land.

Submerged Land

- A5. To avoid preparer burden, SFFAS 59 does not require that non-OCS submerged land be separately measured and reported when estimating overall acreage. The illustration on conservation and preservation land use subcategories in appendix B of SFFAS 59 includes "watersheds and water resources" (some of which could be underwater land) within estimated acreage. The Board does not seek exact precision in this regard and provides the preparer with significant flexibility when estimating acres or when ascertaining how best to aggregate acreage estimates. Therefore, preparers may include non-OCS submerged land estimated acreage in the notes as part of the overall reported acreage estimates or simply provide a narrative disclosure describing its mission related to such lands without the need to estimate non-OCS estimated acreage. The Board believes this would reduce preparer and audit burden relating to estimating submerged land acreage.

Land Improvements

- A6. The determination of whether land improvements should be expensed or capitalized hinges on their nature, longevity, and contribution to the land's overall use. Expenditures related to routine maintenance, temporary enhancements, and short-term land treatments are generally expensed.

- A7. In general, accounting principles are inclined to expense costs that are recurring in nature, such as landscaping upkeep, pest control, and seasonal treatments because these expenditures do not create an enduring asset that would justify capitalization. Expensing these items ensures that financial statements accurately reflect ongoing operational costs, preventing inflation of asset values that could mislead users regarding the entity's financial position.
- A8. Conversely, distinct land improvements that enhance the usability, functionality, or durability of the land over an extended period are typically capitalized. This includes permanent modifications such as road construction, installation of irrigation systems, and fencing, which may fundamentally change the characteristics of the land and provide measurable future benefits. These costs are operational. Capitalizing allows them to be allocated across multiple accounting periods, aligning expenses with the periods in which benefits are realized. Proper classification between expensed and capitalized land improvements ensures compliance with SFFAS 6 and supports informed decision-making by users.
- A9. Consequently, land improvements would continue to be reported as PP&E after land acreage transitions to the notes to the financial statements.

Permanent Land Rights

- A10. As stated at paragraph A9 in the basis for conclusions of SFFAS 59, due to concerns that the stewardship and operating performance reporting objectives and qualitative characteristics—such as relevance and comparability—were not being met, the Board agreed to expense G-PP&E land and associated permanent land rights and disclose estimated acres in a note.
- A11. In so doing, the Board did not change the accounting or reporting requirements for either temporary land rights (land rights of limited duration) or permanent land rights (land rights of unlimited duration). As such, permanent land rights are not to be depreciated or amortized. The Board understood that, in most cases, permanent land rights, such as easements, water rights, or mineral rights are inseparable from the land or lack distinct valuation; therefore, their treatment as a separate asset becomes impractical and creates unnecessary preparer burden. Without a clear mechanism to assign a measurable cost to these rights apart from the land, capitalization would lead to unnecessary preparer burden and arbitrary allocations that do not reflect the true economic substance of the underlying transaction(s). Expensing these rights instead provides a more accurate representation of financial performance, ensuring that only identifiable temporary land rights are reflected as assets and amortized accordingly.

Ownership and Supporting Documentation

- A12. This TB incorporates concepts from paragraphs 81-83 and 85 of TR 9 concerning supporting documentation for land and methodologies for developing supporting documentation.
- A13. Paragraph 81 of TR 9 states:

In the Basis for Conclusions of SFFAS 29, par. 86-88, The FASAB briefly discusses the fundamental problems associated with providing corroborating documentation to auditors on historical assets which predate the effective date of the standard and were

acquired in an environment in which the historical records were not required to be retained and therefore, may not exist or be inadequate.

A14. Paragraph 82 of TR 9 states:

The public domain once stretched from the Appalachian Mountains to the Pacific. Of the approximate 1.8 billion acres of public land acquired by the United States, about two-thirds went to individuals, corporations, and the states. The remaining public domain was set aside for national forests, wildlife refuges, national parks and monuments, and other public purposes.

A15. Paragraph 83 of TR 9 states:

Definitive documentation on the majority of these lands is not available; therefore management must choose alternative methods of satisfying management's assertions for these assets.

A16. Such alternative methods would typically be based upon policies and procedures that explain how ownership determinations are made and supported. Use of professional judgment when records are incomplete or ambiguous could include reliance on historical as well as operational information or a combination of both.

A17. Paragraph 85 of TR 9 states:

...when original property records or other documentation (for example, deeds, tax assessments, insurance records, etc.) for [HA/SL] do not exist, a methodology needs to be employed in order to develop alternative documentation to support management's assertions of federal ownership.

A18. Therefore, practitioners must seek alternative support when attesting to federal land acquired because historical records may be incomplete, deteriorated, or entirely absent due to several factors such as the passage of time, changes in record-keeping practices, or natural disasters. In such cases, practitioners should consider other sources of verification. Alternative methods, such as satellite imagery, expert analysis, legal precedents, and testimonies from land historians or long-established local communities, can help reconstruct ownership history and confirm the legitimacy of land claims. Additionally, practitioners may review third-party land surveys such as from state/local governments or private entities, geological data supporting territorial claims, or archival government correspondence to corroborate historical acquisition details. This approach ensures a comprehensive assertion and attestation process that upholds accuracy, accountability, and compliance with the SFFAS 59 requirements and is consistent with existing guidance at TR 9.

APPENDIX B: ABBREVIATIONS

FASAB	Federal Accounting Standards Advisory Board
FY	Fiscal Year
GAO	Government Accountability Office
G-PP&E	General Property, Plant and Equipment
OCS	Outer Continental Shelf
PP&E	Property, Plant and Equipment
QFR	Question for Respondents
RSI	Required Supplementary Information
SFFAS	Statement of Federal Financial Accounting Standards
TB	Technical Bulletin
TR	Technical Release

APPENDIX C: GLOSSARY

The terms explained in Appendix C have specific application to this TB and may be useful in applying the guidance.

Non-Outer Continental Shelf (OCS) Submerged Land – Submerged lands that are (1) within state territorial waters, rather than those extending into the outer continental shelf and (2) internal or inland waters. State territorial waters refer to the area of water immediately adjacent to a state's coastline, over which the state government has jurisdiction. These waters typically extend up to 12 nautical miles from the baseline of the coastal state. State territorial waters are distinguished from (1) the high seas, which are common to all countries and (2) internal or inland waters, such as lakes wholly surrounded by the national territory or certain bays or estuaries. Examples of internal or inland waters include submerged lands beneath estuaries, waterways, lakes, rivers, and shallow waters surrounding islands.

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