



Advancing
Government
Accountability

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November 18, 2008

Mr. David R. Bean
Director of Research and Technical Activities
Governmental Accounting Standards Board (GASB)
401 Merritt 7, P. O. Box 5116
Norwalk, CT 06856-5116

Dear Mr. Bean:

In the GASB public hearing held on November 14, 2008, FMSB Member Eric S. Berman, CPA, Deputy Comptroller, Commonwealth of Massachusetts, testified on the substance of the recent Financial Management Standards Board (FMSB) comment letter on the Request for Responses on *Suggested Guidelines for Voluntary Reporting of SEA Performance Information*. On behalf of the Association of Government Accountants (AGA), the FMSB appreciates the opportunity to provide follow-up answers to the questions that Mr. Berman was asked during the hearing. The FMSB, comprising 23 members with accounting and auditing backgrounds in federal, state and local government, academia and public accounting, reviews and responds to proposed standards and regulations of interest to AGA members.

1. What should be the next step in the process of due process beyond the RFR stage? - The FMSB thinks that the next step should be a recognized “due process” step, and not the issuance of a final product, whatever that final product may be called. We understand the Board’s desire to avoid creating the perception that they are issuing standards in this regard, but we would still suggest that it could consider issuing an “exposure draft” of suggested guidelines for SEA reporting.

2. AGA is working on a tool kit for SEA reporting – if there is a draft of that available, could that be shared with GASB for comment as part of due process? – We understand that the tool kit is in a very early stage at present, but the AGA Director of the SEA program has agreed to share it to the GASB when it is more finalized. She can be reached at 703 562 0404.

We appreciate the opportunity to provide feedback to the GASB on this topic and would be pleased to discuss this letter with you at your convenience. No member objected to its issuance. If you have questions concerning the letter, please contact Anna D. Gowans Miller, CPA, staff liaison for the FMSB, at amiller@agacgfm.org or 703.684.6931 ext. 313.

Sincerely,

A handwritten signature in black ink that reads "Robert L. Childree".

Robert L. Childree, Chair,
AGA Financial Management Standards Board

cc: Samuel T. Mok, CGFM, CIA, CICA
AGA National President



**Association of Government Accountants
Financial Management Standards Board**

July 2008 – June 2009

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