



February 19, 2018

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

Project: 24-16ED

Dear Mr. Bean:

On behalf of the Association of Government Accountants (AGA), the Financial Management Standards Board (FMSB) appreciates the opportunity to provide comments to the Government Accounting Standards Board (GASB) on its November 20, 2017 exposure draft entitled *Implementation Guide No. 201Y-X, Implementation Guidance Update – 201Y*. The FMSB is comprised of 23 members (list attached) with accounting and auditing backgrounds in federal, state and local government, as well as academia and public accounting. The FMSB reviews and responds to proposed standards and regulations of interest to AGA members. Local AGA chapters and individual members are also encouraged to comment separately.

We appreciate the efforts of the GASB Board in addressing these issues in providing additional clarification and updating current standards. In total we support this standard but have a few comments as provided by members of the FMSB.

We encourage the GASB to consider a potential codification project regarding cash and investments. It is becoming difficult to research cash and investments issues when several standards as well as different codification sections within GASB's *Codification of Government Accounting and Financial Reporting Standards* to consider when researching.

One of our members suggested that GASB consider providing clarification or additional questions in future exposure drafts regarding crossover refunding bonds. Governments are starting to consider these financial instruments to address Build America Bonds as well as potential financing issues relating to the new tax law passed by Congress (particularly the ban on advance refunding bond issuance as a tax-free transaction). Crossover refunding bonds create a complex accounting and reporting transaction, of which there is minimal guidance beyond the fact that there is not a legal defeasance until (each or the) crossover date. Any guidance will provide the necessary resources to those governments when dealing with these types of bonds.

We appreciated Appendix B which provided the changes to the previously issued questions and answers. This helped us understand the changes when evaluating the proposed amendments.

We appreciate the opportunity to comment on this document and will be pleased to discuss this letter with you at your convenience. If there are any questions regarding the comments in this letter, please contact me at (208)383-4756 or Lmiller@eidebailly.com.

Sincerely,

Lealan Miller, CGFM, CPA

Chair- AGA Financial Management Standards Board
cc: James "Jim" R. Arnette, Jr. CGFM, CISA, AGA National President

Association of Government Accountants

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