



June 23, 2020

Mr. David R. Bean, Director of Research and Technical Activities  
Project No. 3-40  
Governmental Accounting Standards Board  
401 Merritt 7  
P.O. Box 5116  
Norwalk, CT 06856-5116

VIA Email: [director@gasb.org](mailto:director@gasb.org)

Dear Mr. Bean:

On behalf of the AGA, the Financial Management Standards Board (FMSB) appreciates the opportunity to provide comments to the Government Accounting Standards Board (GASB/Board) on its proposed Technical Bulletin *Accounting and Financial Reporting Issues Related to the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) of 2020 and Coronavirus Diseases* and is respectfully providing feedback on the Board's views.

The FMSB is comprised of 19 members (list attached) with accounting and auditing backgrounds in federal, state, and local government, and public accounting. The FMSB reviews and responds to proposed standards and regulations of interest to AGA members. The views of the FMSB do not necessarily represent those of AGA or the local AGA chapters and individual members are also encouraged to comment separately.

We appreciate the efforts of the Board to provide guidance on these topics in such a timely manner. Regarding questions 1-5, we agree with the Board's responses and offer no suggested revisions.

Regarding question 6, it is difficult not to consider our federal, state, and local governments' response to the COVID-19 global pandemic as "extraordinary" or "special" in a general sense. However, we realize that we are bound by the meanings and interpretations of these words as used in GASB's authoritative guidance, particularly Statement 34, paragraphs 55 and 56, and the associated definitions in Statement 62, paragraph 46 defining the terms "unusual nature" and "infrequency of occurrence", therefore we concur with the Board's decision not to consider the outflows of resources as "extraordinary" or "special" as discussed below.

We agree the novel coronavirus identified in 2019 (SARS-CoV-2) will exist in the foreseeable future and the varied diseases (COVID-19) caused by this virus will be experienced by the population in the foreseeable future. Therefore, we agree that outflows of resources to address these diseases will occur in the future and would not meet the criteria of Statement 62, paragraph 46, as infrequent. We must also consider whether these outflows of resources should be considered "unusual". We agree that coronaviruses occur in nature and that prior deadly corona viruses existed (MERS-CoV in 2012 and SARS-CoV in 2003). Therefore, we agree the exhibit of deadly corona viruses should not be considered unusual. Since the underlying issue of

coronavirus diseases cannot be considered infrequent or unusual under the GASB terminology, we offer no suggested changes to the response to question 6.

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](mailto:Lmiller@eidebailly.com).

Sincerely,

A handwritten signature in cursive script that reads "Lealan Miller".

Lealan Miller, CGFM, CPA  
Chair- AGA Financial Management Standards Board

cc: Ernest A. Almonte, CGFM, CPA, AGA National President

Financial Management Standards Board  
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