



April 22, 2020

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

Re: Project 3-39, Exposure Draft, *Postponement of the Effective Dates of Certain Authoritative Guidance*

VIA Email: 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 Exposure Draft, *Postponement of the Effective Dates of Certain Authoritative Guidance* 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 and the local AGA chapters and individual members are also encouraged to comment separately.

Overall, we strongly support the proposed delay of effective dates of certain authoritative guidance as outline in the ED. Given the extra efforts and challenges from working from home, governments at every level will need this relief to properly plan for these standards. In addition, the potential adverse budgetary impact of the crisis on governments may lead to less money available to pay for costs of implementing new standards.

Given the proposed delay of Statement 87 Leases to fiscal years beginning after December 15, 2020, we request the Board consider synchronizing the effective date of the Subscription-Based Information Technology Arrangements project with this date. A synchronized implementation date for this upcoming standard will provide relief to preparers from trying to differentiate the underlying asset from the overall accounting treatment.

We also appreciate the board's proposed action in paragraph 4 of the ED on *Certain Component Unit Criteria, and Accounting and Financial Reporting for Internal Revenue Code Section 457 Deferred Compensation Plans* to provide for effectiveness upon issuance to provide relief for those preparers that are implementing Statement 84 for the fiscal year ended December 31, 2019.

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,

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

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