



Advance. Grow. Accelerate.

December 20, 2022

Governmental Accounting Standards Board
401 Merritt 7
Norwalk, CT 06856

RE: Comments on GASB Project No. 24-16g, Exposure Draft – *Implementation Guidance Update - 2023*

The Financial Management Standards Board (FMSB) of the AGA appreciates the opportunity to provide comments on the Governmental Accounting Standards Board's proposed standards.

We appreciated the questions and answers, as they provide helpful clarification to situations and questions our members are facing. We also appreciated the inclusion of Appendix B to show the tracked changes for amendments to previously issued questions and answers. This would have been a time-consuming task to attempt to locate and compare to the answer in its current form in order to understand the change. We hope that future exposure drafts continue this helpful practice.

We have one recommendation for the Board to consider amending the answer for Question 4.9. In this case, the scenario could be construed as meeting criteria of GASB 100 paragraph 9a (addition or removal of a fund) or paragraph 9b (change in a fund's presentation as major or nonmajor). The answer appropriately addresses and explains criteria of paragraph 9a but does not address 9b. Some of our members presumed that criteria in paragraph 9b would not apply because the fund no longer exists and paragraph 9b was only intended to address situations where major fund presentation changes had existed and continues to exist. We believe the answer would be more helpful if it explicitly addressed the application of paragraph 9b to this situation as well.

Sincerely,

A handwritten signature in black ink, appearing to read 'Scott DeViney', with a large, sweeping flourish at the end.

Scott DeViney, CPA
Chair, Financial Management Standards Board



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AGA
Financial Management Standards Board

The FMSB is comprised of the following twenty-two members 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. The purpose of the FMSB is to advocate for the improvement of accounting and financial reporting standards at all levels of government and thus advance government accountability. The views of the FMSB do not necessarily represent those of AGA. Local AGA chapters and individual members are also encouraged to comment separately.

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