



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

April 24, 2020

Via email to drbean@gasb.org

RE: Invitation to Comment: Postponement of the Effective Dates of Certain Authoritative Guidance

Dear David:

The National Federation of Municipal Analysts (NFMA) is pleased to respond to the request for comments on the Exposure Draft relating to the Governmental Accounting Standards Board (GASB) Proposed Statement on the Postponement of the Effective Dates of Certain Authoritative Guidance.

The NFMA is a not-for-profit association with nearly 1,300 members in the United States, comprising a broad range of municipal bond analysts from the buy-side, sell-side, rating agencies and bond insurers. The mission of the NFMA is to enhance the professional development and analytical contributions of municipal market participants through best-in-class educational programs, networking opportunities and targeted advocacy that supports improved disclosure to benefit the industry. The NFMA has published an extensive library of Best Practices in Disclosure and White Papers which are available on our website, www.nfma.org.

The NFMA supports the GASB's efforts to improve the transparency and quality of financial information available to help users of financial statements more accurately evaluate the credit attributes, trends and fiscal health of governmental entities. However, the unprecedented circumstances governmental entities are now encountering in their efforts to address and manage through the COVID-19 pandemic warrants reconsideration of activities that would create distractions and/or add to the burdens they are currently facing.

We support the GASB's proposal to provide temporary relief from the new accounting and financial reporting requirements, as detailed in the Exposure Draft, by postponing implementation by one-year. The pandemic has disrupted normal operations for many governmental entities. Strained available resources (financial and personnel), financial and operating dynamics, and public safety issues may challenge the ability of many governmental entities to implement the new



standards without a delay in the publication of audited financial statements.

Many of the accounting and financial requirements affected by the GASB's proposed delay are important to our membership, but at this time we feel it is more important that reporting entities get their audited information into the public domain as quickly as possible. Timely financial reporting has become even more critical as the sector's issuers of public debt are arguably under the greatest financial and operating pressure in modern times.

The support expressed above for GASB's proposal is made in the context of the current pandemic and does not suggest, in any way, that implementation of any of the affected standards is less important today than previously. Once governmental entities resume (relatively) normal operations, the implementation of the affected standards should recommence.

We thank you for the opportunity to provide our comments on the Proposed Statement on the Postponement of the Effective Dates of Certain Authoritative Guidance and would be happy to discuss our feedback in follow-up communications.

Sincerely,

Sincerely,

/s/ Lisa Washburn

Lisa Washburn
NFMA Representative to GASAC

