

January 29, 2016

Technical Director  
Financial Accounting Standards Board  
401 Merritt 7  
P.O. Box 5116  
Norwalk, CT 06856-5116

RE: File Reference No. 2015-340

To Whom It May Concern:

One of the expressed goals of the Texas Society of Certified Public Accountants (TSCPA) is to speak on behalf of its members when such action is in the best interest of its members and serves the cause of Certified Public Accountants in Texas, as well as the public interest. The TSCPA has established a Professional Standards Committee (PSC) to represent those interests on accounting and auditing matters. The views expressed herein are written on behalf of the PSC, which has been authorized by the TSCPA Board of Directors to submit comments on matters of interest to the committee membership. The views expressed in this letter have not been approved by the TSCPA Board of Directors or Executive Board and, therefore, should not be construed as representing the views or policy of the TSCPA.

The following is our response to the above-referenced exposure draft (ED) Government Assistance (Topic 832) *Disclosure by Business Entities about Government Assistance*.

We are generally in agreement with the basis for the issuance of this ED and support the disclosures that will be required by the provisions of this Standard. Regarding the questions posed in the ED, we have consolidated some of our responses rather than provide a duplicate answer to individual questions.

#### **Questions 1 through 8**

We agree with the guidance that is referred to in questions 1 through 8. The scope of the amendments and proposed disclosure requirements appear to accomplish the overall objectives of the Standard. The required disclosures do not appear to subject entities to a burdensome responsibility. We feel the benefits of the required disclosures outweigh any cost associated with the identification and presentation of the data. Also, the information required in the disclosures would most definitely improve the transparency related to government assistance agreements.

#### **Question 9**

We favor limiting required interim disclosures about government assistance to material changes occurring since the most recent annual period. This information appears to provide a sufficient amount of data to interested users.

**Question 10**

We favor the amendments included in the proposed Update that call for application to all agreements existing at the effective date as well as those entered into after the effective date with retrospective application permitted.

**Questions 11 and 12**

The proposed amendments, as well as the amount of time preparers need to implement the proposed amendments, should be the same for both public business entities and nonpublic business entities.

We appreciate the opportunity to provide input into the standard-setting process.

Sincerely,



Jerilyn K. Barthel, CPA  
Chair, Professional Standards Committee  
Texas Society of Certified Public Accountants