



## Association of Local Government Auditors

January 27, 2017

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Mr. David R. Bean  
Director of Research and Technical Activities  
Government Accounting Standards Board (GASB)  
Project No. 24-16ED  
401 Merritt 7, PO Box 5116  
Norwalk, CT 06856-5116

Re: Proposed Implementation Guide No. 201X-Y, *Implementation Guidance Update-201X*

Dear Mr. Bean,

The Association of Local Government Auditors (ALGA) appreciates the opportunity to respond to GASB's exposure draft of the proposed Implementation Guide No. 201X-Y, *Implementation Guidance Update-201X*. Our organization represents more than 340 audit organizations and about 2,200 members. This topic is of interest to our members, and we encourage individual audit organizations and members to comment independently should they choose to do so.

We have reviewed the proposed Implementation Guide and appreciate the GASB providing guidance that clarifies, explains, and elaborates on GASB Statements and Interpretations. Overall, we believe the Implementation Guide meets its intended objective. Many of the responses to the questions are very thorough due to the complexity of the subject matter which we agree are necessary for the reader's understanding. However, some questions and answers could be simplified or modified as discussed below.

1. To help improve readability of the answers, consider putting the sentence(s) answering the question first in paragraphs 4.27, 4.29, 4.32, 4.33, 5.9, 5.14, 5.21, 5.29, and 5.32. Then the additional information supporting the answer would be secondary. For example, the answer for 5.9 could read as follows:

*"This plan is a cost-sharing multiple-employer plan for purposes of applying Statement 67. The classification of the plan depends on whether there are legal restrictions..."*

This would be instead of having the sentence "...this plan is a cost-sharing multiple-employer plan..." last within the answer.

2. To help improve readability and consistency of the answers, consider using the “Yes/No” or “Generally, yes/no” statement at the beginning of the answers in paragraphs 4.39 and 5.1, respectively. For example, the answer for 4.39 could read as follows:

*“No. The 5 percent limit does not apply to either of the investments...”*

Then the additional information supporting the answer would be secondary.

3. To help improve readability and consistency of the answers, consider rewording question 4.13 in order to provide a “Yes/No” statement at the beginning of the answer. For example, instead of using an “or” within the question for 4.13, the question could read as follows:

*“...Should the health insurance subsidy be classified as OPEB for financial reporting purposes?”*

The supporting answer could begin with a No statement. Then the additional information supporting the answer would be secondary.

Respectfully submitted,

Larry Stafford  
Chair, Professional Issues Committee

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