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February 28, 2019

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Mr. David R. Bean
Director of Research and Technical Activities
Government Accounting Standards Board (GASB)
Project No. 3-13
401 Merritt 7, PO Box 5116
Norwalk, CT 06856-5116

Re: Proposed Implementation Guide of the Governmental Accounting Standards Board,
Implementation Guide Fiduciary Activities

Dear Mr. Bean,

The Association of Local Government Auditors (ALGA) appreciates the opportunity to respond to GASB's *Implementation Guide Fiduciary Activities* exposure draft. ALGA represents 272 audit organizations comprising more than 2,200 individuals. 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 Fiduciary Activities* and appreciate the GASB providing guidance that clarifies, explains, and elaborates on GASB Statements. Overall, we believe the Implementation Guide meets its intended objective. However, to further enhance the user's understanding, some questions and answers could be modified as discussed below.

- **Question 4.3** – This question uses the term “equivalent arrangement.” This term is neither defined within GASB Statement No. 84 nor in the proposed Implementation Guide. To further enhance the use of the Implementation Guide and ensure consistency in financial reporting, consider adding a question and answer either before or after question 4.3 that both defines “equivalent arrangement” and provide an example.
- **Question 4.15 and 4.25** – To help improve readability, consider including a reference from paragraph 4.15 to 4.25 for additional information and vice versa. For example, consider including the following statement in the answer at paragraph 4.15, “See also Question 4.25 about administrative involvement.”

Respectfully submitted,

Nicole Rollins
Chair, Professional Issues Committee

Key ALGA Contributor: Kelly Houston, Buncombe County, NC