April 9, 2020

Director of Research and Technical Activities
Governmental Accounting Standards Board
401 Merritt 7
Norwalk, CT 06856-5116

RE: Project No. 3-38

Dear Mr. Bean,

The Association of Local Government Auditors (ALGA) appreciates the opportunity to share comments on the Certain Component Unit Criteria, and Accounting and Financial Reporting for internal Revenue Code Section 457 Deferred Compensation Plans.

ALGA represents 330 government audit organizations comprising more than 2,700 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.

In concept, ALGA supports the objectives and proposed changes to this Statement: 1) to increase consistency and comparability of reporting; 2) to mitigate cost associated with reporting certain defined contribution plans; and 3) to enhance relevance, consistency and comparability of reporting for Internal Revenue Code Section 457 plans that meet the definition of a pension plan.

However, given the current COVID-19 crisis which has impacted our members’ work environment and ability to review this exposure draft in detail, we request GASB consider an extension of the comment period. This draft was released for comment on March 5, 2020 and the due date is April 9, 2020. During this 5 week period many organizations were taxed by relocating their workforce to accommodate stay at home orders. This topic deserves a more thorough review than we are able to provide at this time.

Thank you for your consideration.

Respectfully submitted,

Victoria Classen, City of Colorado Springs, CO
Chair, Professional Issues Committee