March 28, 2017

Mr. David Bean
Director of Research and Technical Activities
Governmental Accounting Standards Board
401 Merritt 7, P.O. Box 5116
Norwalk, CT 06856-5116

RE: Project No. 3-25l

Dear Mr. Bean:

The Clark County School District (CCSD) appreciates the opportunity to comment on the Governmental Accounting Standards Board’s December 7, 2016 Invitation to Comment, Financial Reporting Model Improvements – Governmental Funds. CCSD provides public education from kindergarten to twelfth grade and offers many educational resources in order to meet the needs of the children and adults of Clark County, Nevada. CCSD is the fifth largest school district in the nation. Our Comprehensive Annual Financial Report and Popular Annual Financial Report can be found on our website at www.ccsd.net/departments/accounting-department.

QUESTIONS FOR READERS OF THIS INVITATION TO COMMENT

Chapter 2: Recognition Approaches for Governmental Fund Financial Statements

2.1. Do you believe that governmental fund financial statements should continue to present information that reflects a shorter time perspective than the information presented in the government-wide financial statements and that focuses on financial, rather than economic, resources? Why?

Yes, a comprehensive financial report should satisfy diverse needs from investors to citizens.

2.2. Do you believe that governmental fund financial statements should continue to present information that facilitates comparisons with a government’s budgetary information? Why?

Yes, for accountability and compliance to state regulations.

2.3. Which of the three recognition approaches provides the most relevant information for assessing fiscal accountability of the government? Why do you consider that information most relevant?

Short term: Our financials would be similar to how they are currently presented and budget would remain comparable. It would also be less of a change for our end users. Focusing on a one-year operating cycle in the governmental funds allows for better representation of whether we are able to meet short-term obligations and the overall financial health. The government-wide statements will remain available for a long-term approach.
2.7. Paragraph 6 of Chapter 2 discusses a same-page reconciliation to government-wide information and the use of specific terminology to more clearly communicate that the information in governmental fund financial statements is of a shorter time perspective than information in the government-wide financial statements and focuses on financial, rather than economic, resources. Are these changes effective in communicating that the information in governmental fund financial statements is different from the information in government-wide financial statements? How could those differences be communicated more effectively?

Yes, adding a reconciliation to the bottom of each statement would clearly communicate the difference between fund statements and government-wide statements.

Chapter 3: Other Governmental Fund Financial Statement Issues

3.1. Which format for the governmental funds resource flows statement—existing format or current and long-term activity format—provides the most valuable information about governmental funds? Why do you consider the information to be more valuable?

Existing: Other Financing Sources should serve more as non-tax based revenue/expenses, not as a long-term activity. Certain aspects seem to be confusing such as current transfers in/out and long term transfers in/out.

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We appreciate the opportunity to share our thoughts on the Invitation to Comment. If you have any questions regarding our comments, please contact our Accounting Department at (702) 799-5338.

Sincerely,

[Signature]

Shelly Hughes
Accounting Director