February 6, 2020

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

RE: Project No. 24-16e, Exposure Draft on Implementation Guidance Update - 2020

Dear Mr. Bean:

The Technical Accounting and Review Committee (TARC) of the Illinois Government Finance Officers Association (IGFOA) has reviewed the Exposure Draft of the Implementation Guide for 2020. TARC would like to thank the Board for the opportunity to comment on this Exposure Draft.

TARC reviewed questions 4.5 and 4.6 and was concerned that the reader may be misled that the existence of specific spending parameters was the only factor considered surrounding administrative involvement. The definition in Statement 84 regarding administrative involvement lists several factors which would create administrative involvement, of which discretion on spending funds is only one factor. TARC would recommend explicitly stating that the other factors considered did not create administrative involvement. In question 4.6, TARC also did not understand how having a policy that the funds had to be spent on the senior class was creating less administrative involvement than the response in question 4.5. In both scenarios, the Board policy was restricting use of the funds to certain parameters. While the use in question 4.5 may be more specific than in 4.6, TARC felt there was still defined parameters on how the funds could be used in both questions.

Again, TARC greatly appreciates the opportunity to provide feedback to the Board.

Sincerely,

Christina Coyle, CPA
Chair, Technical Accounting Review Committee
Illinois Government Finance Officers Association