April 29, 2019

Director of Research and Technical Activities
Project No. 3-39
Governmental Accounting Standards Board
401 Merritt 7
Norwalk, CT 06856-5116

We appreciate the opportunity to respond to the Governmental Accounting Standards Board’s Exposure Draft document, *Postponement of the Effective Dates of Certain Authoritative Guidance*.

We are supportive of extending the implementation dates for the pronouncements listed in the exposure draft. We would ask that the Board consider further extending the effective date for GASB Statement No. 87, *Leases*, and request it be pushed back by at least two years from the original effective date.

The background information and basis for conclusion sections of the exposure draft does address complexities with implementing new standards with stay-at-home orders and resource restraints of staff. However, we feel that the costs of purchasing new software systems in order to implement the standard was not adequately considered in the delayed timeframe.

Large entities, such as ours, with a large number of potential leases, have a need to purchase a software system to house and create accounting entries in order to comply with the standard. At a time when many are asked to reduce spending and are laying off employees, the additional expense for an unfunded accounting mandate is just not feasible. In addition, it is unknown how long the impact of the virus will last both with the strained resources of staff and financially.

We appreciate the opportunity to provide comments and ask that you consider the financial constraints that many entities are facing right now and into the future by allowing additional time for financial impacts of COVID-19 to be understood and managed. The cost that system purchases have in the implementation of an expensive standard, such as leases, is large and could create a financial burden without the further delay of the standard. If you have any questions regarding our response, please contact me at 573-882-3377.

Sincerely,

Jessica Opie, CPA
*Associate Controller*