



COMMONWEALTH of VIRGINIA

Auditor of Public Accounts

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To Whom It May Concern:

We appreciate the opportunity to respond to the exposure draft of the Governmental Accounting Standards Board (the Board) on the *Recognition of Elements of Financial Statements*. In general, we believe that more context on the overall objective(s) of the short-term financial resources measurement focus (STMF) should be added to the proposed Concept Statement. As Concept Statements generally identify the objectives and fundamental principles of financial reporting, we did not see where the Board has established this basis for the STMF in the proposed statement. A discussion of the overall objective(s) will provide the additional context needed to assist preparers and auditors in understanding the need and derived benefit the STMF will provide to the intended users of the financial statements, considering the continued costs and decreased historical comparability this fundamental change will bring.

We appreciate the efforts of the Board and the opportunity to provide our comments. Should you have any questions or need additional information concerning our response, please contact LaToya Jordan or me at (804) 225-3350.

Sincerely,

Staci Henshaw
Auditor of Public Accounts