



April 30, 2020

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

Dear Mr. Bean:

On behalf of the National Association of State Auditors, Comptrollers and Treasurers, we appreciate the opportunity to respond to the Governmental Accounting Standards Board's Exposure Draft (ED), *Postponement of the Effective Dates of Certain Authoritative Guidance*.

We appreciate the Board's responsiveness to the current situation and agree with the proposed changes and the general one-year postponement of implementation dates. We also agree with the Board's conclusion in Paragraph B6 and appreciate that the Board will also be considering the current circumstances when making decisions on all new pronouncements that have not yet been finalized.

However, we suggest that the title for paragraphs 4 and 5, "Postponement of Effective Dates," be revised to "Postponed Effective Dates" or "New Effective Dates Due to Postponement" to make it clear that the dates in this section are the new effective dates.

We appreciate the opportunity to provide our comments. Should you have any questions or need additional information regarding our response, please contact Kim O'Ryan of NASACT at (859) 276-1147 or me at (802) 828-3322.

Sincerely,

Beth Pearce  
President, NASACT  
State Treasurer, Vermont