

First Quarter 2020 Standard Setter Update

Financial reporting and accounting developments
(current through 31 March 2020)

April 2020



To our clients and other friends

This First Quarter 2020 Standard Setter Update highlights significant developments in financial reporting and accounting between 1 January 2020 and 31 March 2020, except as noted. Our Standard Setter Update publications also summarize certain proposals under consideration by the Financial Accounting Standards Board (FASB or Board), the Emerging Issues Task Force (EITF or Task Force), the Private Company Council (PCC), the Securities and Exchange Commission (SEC or Commission), the Public Company Accounting Oversight Board (PCAOB), the Auditing Standards Board (ASB) and the Governmental Accounting Standards Board (GASB). For additional details on these developments, we refer you to related EY publications, many of which can be found on our AccountingLink website. We will continue to keep you informed about important developments as they occur.

Ernst + Young LLP

April 2020

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Financial Accounting Standards Board

Final FASB guidance

Reference Rate Reform (Topic 848), Facilitation of the Effects of Reference Rate Reform on Financial Reporting (ASU 2020-04)

Date issued: 12 March 2020

Summary

The Accounting Standards Update (ASU) provides temporary optional expedients and exceptions to the US GAAP guidance on contract modifications and hedge accounting to ease the financial reporting burdens of the expected market transition from the London Interbank Offered Rate (LIBOR) and other interbank offered rates to alternative reference rates, such as the Secured Overnight Financing Rate. Entities can elect not to apply certain modification accounting requirements to contracts affected by what the guidance calls reference rate reform, if certain criteria are met. An entity that makes this election would not have to remeasure the contracts at the modification date or reassess a previous accounting determination. Entities can elect various optional expedients for hedging relationships affected by reference rate reform, if certain criteria are met. Entities can make a one-time election to sell and/or transfer to available for sale or trading any held-to-maturity (HTM) debt securities that refer to an interest rate affected by reference rate reform and were classified as HTM before 1 January 2020.

Effective date and transition

The guidance is effective upon issuance and generally can be applied through 31 December 2022.

Other resources

- To the Point, *FASB provides accounting relief for the transition away from LIBOR and certain other reference rates*

Codification Improvements to Financial Instruments (ASU 2020-03)

Date issued: 9 March 2020

Summary

The ASU makes narrow-scope improvements to various financial instruments topics, including the new credit losses standard.

Effective date and transition

Transition varies, with some of the amendments effective upon issuance for certain entities.



Financial Instruments – Credit Losses (Topic 326) and Leases (Topic 842), Amendments to SEC Paragraphs Pursuant to SEC Staff Accounting Bulletin No. 119 and Update to SEC Section on Effective Date Related to Accounting Standards Update No. 2016-02, Leases (Topic 842) (SEC Update) (ASU 2020-02)

Date issued: 6 February 2020

Summary

The ASU adds and amends SEC paragraphs in the Accounting Standards Codification (ASC or Codification) to reflect the issuance of SEC Staff Accounting Bulletin No. 119 related to the new credit losses standard and comments by the SEC staff related to the revised effective date of the new leases standard.

Investments – Equity Securities (Topic 321), Investments – Equity Method and Joint Ventures (Topic 323), and Derivatives and Hedging (Topic 815), Clarifying the Interactions between Topic 321, Topic 323, and Topic 815 (ASU 2020-01)

Date issued: 16 January 2020

Summary

The guidance clarifies that entities that apply the measurement alternative in ASC 321 should consider observable transactions that result in entities initially applying or discontinuing the use of the equity method of accounting under ASC 323. The guidance also says that certain forward contracts and purchased options on equity securities that are not deemed to be in-substance common stock under ASC 323 or accounted for as derivatives under ASC 815 are in the scope of ASC 321.

Effective date and transition

The guidance is effective for public business entities (PBEs) for fiscal years beginning after 15 December 2020, and interim periods within those fiscal years. For other entities, the guidance is effective for fiscal years beginning after 15 December 2021, and interim periods within those fiscal years. Early adoption is permitted. The guidance should be applied prospectively.

FASB exposure documents

Issued this quarter

Not-for-Profit Entities (Topic 958), Presentation and Disclosures by Not-for-Profit Entities for Contributed Nonfinancial Assets

Date issued: 10 February 2020 – comment period ends 10 April 2020

Summary

Under the proposal, not-for-profit entities (NFPs) would present contributed nonfinancial assets as a separate line item in the statement of activities (i.e., separately from contributions of cash or other financial assets). In the notes to the financial statements, NFPs would disaggregate contributed nonfinancial assets recognized in the statement of activities by category to show the type of contributed nonfinancial assets. They also would provide new disclosures for each category.

Effective date and transition

The effective date has not yet been determined. The proposal would be applied retrospectively to all periods presented.

Other resources

- ▶ FASB Project Update: Not-for-Profit Reporting of Gifts-in-Kind
- ▶ To the Point, *Proposal would change an NFP's presentation and disclosure about contributed nonfinancial assets*
- ▶ Comment letter

Proposals previously issued

- ▶ Codification Improvements
 - ▶ *Date issued: 26 November 2019 – comment period ended 26 December 2019*
- ▶ Derivatives and Hedging (Topic 815), Codification Improvements to Hedge Accounting
 - ▶ *Date issued: 12 November 2019 – comment period ended 13 January 2020*
- ▶ Debt (Topic 470), Simplifying the Classification of Debt in a Classified Balance Sheet (Current versus Noncurrent)
 - ▶ *Date issued: 12 September 2019 – comment period ended 28 October 2019*
- ▶ Debt – Debt with Conversion and Other Options (Subtopic 470-20) and Derivatives and Hedging – Contracts in Entity's Own Equity (Subtopic 815-40), Accounting for Convertible Instruments and Contracts in an Entity's Own Equity
 - ▶ *Date issued: 31 July 2019 – comment period ended 14 October 2019*
- ▶ Disclosure Improvements, Codification Amendments in Response to the SEC's Disclosure Update and Simplification Initiative
 - ▶ *Date issued: 6 May 2019 – comment period ended 28 June 2019*

- ▶ Income Taxes (Topic 740), Disclosure Framework – Changes to the Disclosure Requirements for Income Taxes
 - ▶ *Date issued: 25 March 2019 – comment period ended 31 May 2019*
- ▶ Consolidation (Topic 812), Reorganization
 - ▶ *Date issued: 20 September 2017 – comment period ended 4 December 2017*
- ▶ Inventory (Topic 330), Disclosure Framework – Changes to the Disclosure Requirements for Inventory
 - ▶ *Date issued: 10 January 2017 – comment period ended 13 March 2017*
- ▶ Concepts Statement No. 8 – Conceptual Framework for Financial Reporting, Chapter 7: Presentation
 - ▶ *Date issued: 11 August 2016 – comment period ended 9 November 2016*
- ▶ Government Assistance (Topic 832), Disclosures by Business Entities about Government Assistance
 - ▶ *Date issued: 12 November 2015 – comment period ended 10 February 2016*

Other resources

- ▶ *2019 Standard Setter Update*
- ▶ *Comment letter, Codification Improvements to Hedge Accounting*

Other FASB

Relief related to COVID-19

Summary

Banking regulators issued a joint statement on 22 March 2020 encouraging financial institutions to provide relief for borrowers affected by the coronavirus (COVID-19) pandemic. The joint statement includes guidance developed in consultation with the FASB staff stating that short-term loan modifications (e.g., deferrals of payments) made to help borrowers who are current manage their liquidity needs are not to be considered troubled debt restructurings (TDRs). Under the guidance, financial institutions also do not have to designate loans with deferrals granted due to the coronavirus as past due or put them on nonaccrual status solely because of such a payment deferral.

Subsequently, the Coronavirus Aid, Relief, and Economic Security (CARES) Act was signed into law on 27 March 2020. The CARES Act allows financial institutions to elect not to apply the guidance in ASC 310-40 on accounting for TDRs to loan modifications related to COVID-19 made between 1 March 2020 and the earlier of 31 December 2020 or 60 days after the end of the COVID-19 national emergency. The relief can be applied to modifications for borrowers that were not more than 30 days past due as of 31 December 2019. Insured depository institutions, bank holding companies and their affiliates are also allowed to temporarily not apply the new credit losses guidance in ASC 326 from the date of enactment to the earlier of 31 December 2020 or the end of the COVID-19 national emergency.

Note: At a meeting on 8 April 2020, the FASB discussed its plans to respond to the COVID-19 pandemic and help stakeholders interpret guidance on priority issues. The Board decided to propose deferring by one year the effective date of the new leases standard for private companies, private NFPs and NFPs that have issued or are conduit bond obligors for certain securities. The FASB also decided to propose an option for franchisors that are not PBEs to defer adoption of the new revenue recognition standard to fiscal years beginning after 15 December 2019, and interim periods in fiscal years beginning after 15 December 2020.

Subsequently, the FASB staff issued a question-and-answer document that says entities can elect not to evaluate whether certain relief provided by a lessor in response to the COVID-19 pandemic is a lease modification. The FASB staff said an entity that elects not to evaluate whether a concession is a modification can then elect to apply the modification guidance to that relief or account for the concession as if it were contemplated as part of the existing contract. The FASB staff's publication also addresses other questions the FASB staff discussed at the 8 April 2020 meeting about how to apply the guidance on loan modifications, hedge accounting and fair value measurement in light of the COVID-19 pandemic.

Other resources

- *Technical Line, Accounting for rent concessions related to the COVID-19 pandemic under ASC 842*
- *To the Point, FASB staff clarifies accounting for lease concessions and other effects of COVID-19*
- *To the Point, FASB plans to defer effective dates of certain standards and staff discusses accounting for COVID-19*
- *To the Point, Relief provided by the CARES Act will affect accounting and financial reporting*
- *To the Point, Banking regulators encourage loan modifications for borrowers affected by the coronavirus pandemic*

FASB staff responds to a technical inquiry on the implementation of the new credit losses standard

Date issued: 11 March 2020

Summary

At a March 2020 meeting, the FASB staff shared its response to a technical inquiry clarifying that, under certain conditions, an entity may recognize recoveries from freestanding insurance contracts covering credit losses on financial instruments at the same time it records the expected credit losses under ASC 326.

Other resources

- FASB meeting handout 11 March 2020

FASB staff issues Revenue Recognition Implementation Q&A

Date issued: January 2020

Summary

The FASB staff compiled publicly available Transition Resource Group (TRG) memos and other educational resources previously issued on the implementation of ASC 606, *Revenue from Contracts with Customers*, into a new document called Revenue Recognition Implementation Q&As. The staff's objective in compiling this document, which is organized by subject matter (e.g., step of the revenue model), is to make the available educational resources easier to navigate and not to issue any new implementation guidance.

Other resources

- Revenue Recognition Implementation Q&As

What's next – agenda highlights

FASB agenda

In addition to the topics above, the FASB's agenda includes:

- Codification improvements: financial instruments – credit losses (vintage disclosure: gross write-offs and gross recoveries)
- Hedging: last-of-layer method
- Identifiable intangible assets and subsequent accounting for goodwill
- Accounting by a joint venture for nonmonetary assets contributed by investors
- Distinguishing liabilities from equity phase 2
- Financial performance reporting: disaggregation of performance information
- Segment reporting
- Disclosure framework: disclosures (interim reporting)
- Improving the accounting for asset acquisitions and business combinations
- Conceptual framework: measurement
- Conceptual framework: elements

EITF agenda

In addition to the topics above, the EITF's agenda includes projects on Revenue recognition: contract modifications of licenses of intellectual property (EITF 19-B) and Warrant modifications: issuer's accounting for modifications of equity classified freestanding call options that are not in the scope of Topic 718 or Topic 815 (EITF 19-C). The next EITF meeting is scheduled for 11 June 2020.

PCC agenda

In February, the FASB endorsed the PCC's decisions on Practical expedient to measure grant-date fair value of equity-classified share-based awards (Issue 2018-01) and directed the staff to draft a proposed ASU for vote by written ballot. The next PCC meeting is scheduled for 17 April 2020.

Other resources

- ▶ FASB Technical Agenda
- ▶ Private Company Council Meetings

Securities and Exchange Commission

SEC final rules

Amendments to the Accelerated Filer and Large Accelerated Filer Definitions (Release No. 34-88365)

Date issued: 12 March 2020

Summary

An issuer that qualifies as a smaller reporting company (SRC) and has less than \$100 million in annual revenues in its most recently completed year for which audited financial statements are available will also qualify as a non-accelerated filer that is not required to obtain an auditor's attestation on internal control over financial reporting (ICFR). It would also not be subject to any accelerated filing requirements.

Companies that qualify as emerging growth companies (EGCs) continue to be exempt from the requirement to obtain auditor attestation on ICFR even if they are accelerated filers.

Under the new rule, business development companies with less than \$100 million in investment income also qualify as non-accelerated filers if their public float is less than \$700 million.

The amendments also increase the public float transition threshold for an accelerated filer or large accelerated filer to become a non-accelerated filer to \$60 million from \$50 million, and for a large accelerated filer to become an accelerated filer to \$560 million from \$500 million.

Effective date

The rule is effective 27 April 2020. The rule applies to the determination of an issuer's filer status for purposes of annual reports due on or after the effective date.

Other resources

- ▶ To the Point, *SEC amends rules to exclude certain smaller reporting companies from accelerated filer status*

Financial Disclosures about Guarantors and Issuers of Guaranteed Securities and Affiliates Whose Securities Collateralize a Registrant's Securities (Release Nos. 33-10762; 34-88307)

Date issued: 2 March 2020

Summary

The rules simplify and streamline financial disclosure requirements for companies that conduct registered debt offerings involving subsidiaries as either issuers or guarantors, or pledges of the securities of affiliates as collateral.

Among other changes, the SEC narrowed the circumstances that require separate audited financial statements of subsidiary issuers and guarantors and streamlined the alternative disclosures required in lieu of those statements. The SEC also replaced the requirement for separate financial statements of affiliates whose securities are pledged as collateral for registered securities with requirements similar to those adopted for subsidiary issuers and guarantors.

Effective date

The rule is effective on 4 January 2021, but earlier compliance is permitted.

Other resources

- ▶ To the Point, *SEC streamlines disclosure requirements for certain registered debt offerings*

Orders under Section 36 of the Securities Exchange Act of 1934 granting exemptions from the reporting and proxy delivery requirements for public companies (Release Nos. 34-88318; 34-88465)

Date issued: March 2020

Summary

The SEC issued an order extending temporary relief from certain filing and regulatory requirements to registrants affected by the COVID-19 pandemic. Registrants have an additional 45 days to file Exchange Act reports (e.g., Forms 10-K and 10-Q) that would otherwise have been due on or before 1 July 2020 if they are unable to make a filing deadline due to circumstances related to COVID-19.

Companies relying on the relief must file a Form 8-K or Form 6-K (for foreign private issuers) by the original report deadline that includes (1) a statement that it is relying on the order, (2) a brief description of why it could not file timely, (3) the estimated date by which the report or form is expected to be filed and (4) if appropriate, a risk factor explaining the effect of COVID-19, if material.

Any registrant relying on the order would not need to file a Form 12b-25, as long as the report is filed within 45 days of the report's original filing deadline. But if the reason the report cannot be filed timely relates to the inability of another person, other than the registrant, to furnish an opinion or report, the Form 8-K or Form 6-K must include a statement signed by such person as an exhibit, similar to the requirements of Rule 12b-25(c). Upon filing the delayed report, the registrant must also disclose that it is relying on the order and provide the reasons it could not file timely. If a registrant is unable to file the report by the extended due date, it may file a Form 12b-25 and take advantage of an additional grace period.

Other resources

- ▶ Technical Line, *Accounting and reporting considerations for the effects of the coronavirus outbreak*
- ▶ To the Point, *SEC extends relief and issues staff guidance on COVID-19 disclosures*

Orders granting exemptions from specified provisions of the Investment Company Act and certain rules thereunder; Commission statement regarding prospectus delivery (Release Nos. IC-33821; IC-33824)

Date issued: March 2020

Summary

The SEC issued an order providing temporary relief from the Investment Company Act of 1940 to registered funds affected by the coronavirus pandemic until at least 30 June 2020. Under certain conditions, the order would permit:

- ▶ Registered open-end funds and insurance company separate accounts to borrow money from certain affiliates

- ▶ Funds that haven't been able to use interfund lending arrangements to use them and provide additional flexibility for funds with existing interfund lending arrangements
- ▶ Registered open-end funds to enter into lending arrangements or borrowings that deviate from fundamental policies if they get board approval in advance

Separately, the SEC issued an order to provide investment companies affected by the pandemic with additional time to hold in-person board meetings and comply with certain filing and delivery requirements. Among other things, the order extends the deadline for registered investment companies (RICs) and unit investment trusts (UITs) to transmit annual and semiannual shareholder reports due between 13 March and 30 June 2020 by 45 days and file Form N-CSR within 10 days after the reports are transmitted to shareholders. It also extends by 45 days the deadline for RICs and UITs to file Forms N-CEN and N-PORT due between 13 March and 30 June 2020.

Order granting exemptions from specified provisions of the Investment Advisers Act and certain rules thereunder (Release No. IA-5469)

Date issued: 25 March 2020

Summary

The SEC issued an order extending by 45 days the deadline for registered investment advisers (RIAs) affected by the coronavirus pandemic to satisfy certain filing and delivery obligations due between 13 March and 30 June 2020, subject to certain conditions. Such obligations include the filing of Forms PF and ADV (or Form ADV Part 1A for exempt reporting advisers) and the delivery of amended brochures, brochure supplements or summaries of material changes to clients.

Registrants relying on the relief, among other things, must inform the SEC staff by email and, in certain cases, disclose on their websites that they intend to rely on the order but not why they are unable to meet a filing deadline or delivery requirement or an estimated date of filing or delivery completion.

SEC rule proposals

Issued this quarter

Facilitating Capital Formation and Expanding Investment Opportunities by Improving Access to Capital in Private Markets (Release Nos. 33-10763; 34-88321)

Date issued: 4 March 2020 – comment period ends 1 June 2020

Summary

The SEC proposed changes to the framework for securities offerings that are exempt from registration. Securities offerings must be registered with the SEC or qualify for an exemption from the SEC's registration requirements. The current exempt offering framework has 10 different exemptions, each with its own requirements. In addition, issuers with multiple securities transactions are governed by a mixture of rules and guidance for determining whether these transactions should be considered part of the same offering and exemption. The proposal would:

- ▶ Establish a general principle of integration to help determine whether multiple securities transactions by an issuer should be considered part of the same offering and establish certain safe harbors from the integration of offerings
- ▶ Increase the offering limits for Regulation A, Regulation Crowdfunding and Rule 504 offerings and revise certain individual investment limits
- ▶ Expand the availability of certain "test-the-waters" communications for exempt securities offerings and permit certain "demo day" communications by issuers
- ▶ Harmonize certain disclosure and eligibility requirements and disqualification provisions to reduce the differences among the various exemptions

Management's Discussion and Analysis, Selected Financial Data, and Supplementary Financial Information (Release Nos. 33-10750; 34-88093; IC-33795)

Date issued: 30 January 2020 – comment period ends 28 April 2020

Summary

The proposal would further amend the SEC's rules under Regulation S-K by eliminating the requirement for companies to file selected financial data, selected quarterly financial data and a contractual obligations table in management's discussion and analysis (MD&A). The proposal also would change or clarify certain disclosures in MD&A and codify requirements for disclosures of critical accounting estimates that currently appear only in interpretive guidance. The proposal is part of the SEC's disclosure effectiveness initiative.

Other resources

- ▶ *To the Point, SEC proposes eliminating certain Regulation S-K requirements and enhancing MD&A disclosures*

Highlights of proposals previously issued

Amendments to Financial Disclosures about Acquired and Disposed Businesses (Release Nos. 33-10635; 34-85765; IC-33465)

Date issued: 3 May 2019 – comment period ended 29 July 2019

Summary

The proposal would change many of the SEC's disclosure rules regarding significant businesses that registrants acquire or dispose. The proposal is intended to reduce both the burden of preparing the disclosures and the likelihood of immaterial acquisitions being deemed significant while providing investors with more meaningful disclosures. The proposal would:

- ▶ Revise the significance tests registrants use to determine whether they need to provide financial statements of a business they acquire by incorporating the registrant's market value into the investment test and modifying the income test to use after-tax income and add a revenue component
- ▶ Incorporate into SEC rules the established SEC staff practices on using abbreviated financial statements in certain circumstances
- ▶ Eliminate the requirement to provide three years of financial statements for any acquired business and allow registration statements to omit acquired business financial statements if the target has been consolidated in the audited financial statements for a full year
- ▶ Revise the significance tests and raise the threshold for Form 8-K reporting of disposals of businesses to 20% from 10% to align with the requirements for acquisitions

The proposal would also revise the pro forma financial information requirements to require, in addition to the transaction accounting adjustments, the presentation of management adjustments to reflect synergies and other effects of transactions, including management's plans, that are reasonably estimable and reasonably expected to occur.

Other resources

- ▶ To the Point, *SEC proposes changing disclosure requirements for acquisitions and disposals of businesses*
- ▶ Comment letter

Other proposals previously issued

- ▶ Amendments to Rule 2-01, Qualifications of Accountants (Release Nos. 33-10738; 34-87864; FR-86; IA-5422; IC-33737)
 - ▶ *Date issued: 30 December 2019 – comment period ended 16 March 2020, but the Commission will not take final action before 1 May 2020 to allow commenters additional time if needed*
- ▶ Disclosure of Payments by Resource Extraction Issuers (Release No. 34-87783)
 - ▶ *Date issued: 18 December 2019 – comment period ended 16 March 2020, but the Commission will not take final action before 1 May 2020 to allow commenters additional time if needed*

- ▶ Amending the “Accredited Investor” Definition (Release Nos. 33-10734; 34-87784)
 - ▶ *Date issued: 18 December 2019 – comment period ended 16 March 2020, but the Commission will not take final action before 1 May 2020 to allow commenters additional time if needed*
- ▶ Use of Derivatives by Registered Investment Companies and Business Development Companies; Required Due Diligence by Broker-Dealers and Registered Investment Advisers Regarding Retail Customers’ Transactions in Certain Leveraged/Inverse Investment Vehicles (Release Nos. 34-87607; IA-5413; IC-33704)
 - ▶ *Date issued: 25 November 2019 – comment period ended 24 March 2020, but the Commission will not take final action before 1 May 2020 to allow commenters additional time if needed*
- ▶ Procedural Requirements and Resubmission Thresholds under Exchange Act Rule 14a-8 (Release No. 34-87458)
 - ▶ *Date issued: 5 November 2019 – comment period ended 3 February 2020*
- ▶ Amendments to Exemptions from the Proxy Rules for Proxy Voting Advice (Release No. 34-87457)
 - ▶ *Date issued: 5 November 2019 – comment period ended 3 February 2020*
- ▶ Update of Statistical Disclosures for Bank and Savings and Loan Registrants (Release Nos. 33-10688; 34-86984)
 - ▶ *Date issued: 17 September 2019 – comment period ended 2 December 2019*
- ▶ Modernization of Regulation S-K Items 101, 103, and 105 (Release Nos. 33-10668; 34-86614)
 - ▶ *Date issued: 8 August 2019 – comment period ended 22 October 2019*
- ▶ Securities Offering Reform for Closed-End Investment Companies (Release Nos. 33-10619; 34-85382; IC-33427)
 - ▶ *Date issued: 20 March 2019 – comment period ended 10 June 2019*
- ▶ Fund of Funds Arrangements (Release Nos. 33-10590; IC-33329)
 - ▶ *Date issued: 19 December 2018 – comment period ended 2 May 2019*
- ▶ Amendments to the Commission’s Whistleblower Program Rules (Release No. 33-83557)
 - ▶ *Date issued: 29 June 2018 – comment period ended 18 September 2018*

Other resources

- ▶ Comment letter, *Use of Derivatives by Registered Investment Companies and Business Development Companies*

SEC interpretive releases and SEC staff guidance

C&DIs on notification of inability to timely file certain reports due to COVID-19

Date issued: 31 March 2020

Summary

The SEC Division of Corporation Finance issued two new compliance and disclosure interpretations (C&DIs) to clarify the applicability of Rule 12b-25 and the recent SEC relief order that provides a temporary 45-day extension for registrants affected by COVID-19 to file Exchange Act reports (e.g., Forms 10-K and 10-Q) due through 1 July 2020.

The C&DIs clarify that filing a Form 12b-25 does not meet the conditions required to obtain a 45-day extension under the SEC relief order. That is, the order requires a registrant to file a Form 8-K or Form 6-K by the original due date of the required report to receive the temporary relief. Accordingly, a registrant that files a Form 12b-25 without filing the required Form 8-K obtains only a 15-day grace period for Form 10-K or a five-day grace period for Form 10-Q, not the 45-day extension under the order. However, a registrant that obtains the order's 45-day extension by filing a Form 8-K may subsequently rely on Rule 12b-25 and file Form 12b-25 to notify the SEC of its inability to file the report by the extended due date.

New staff response to questions about the Custody Rule to address COVID-19

Date issued: 30 March 2020

Summary

The SEC staff extended the deadline for an independent public accountant to complete a surprise examination of an RIA's compliance with certain requirements of the Custody Rule by up to 45 days if the RIA and the accountant experienced logistical disruptions resulting from COVID-19, and the RIA reasonably believed that the accountant's examination would have been otherwise completed timely.

CF Disclosure Guidance: Topic No. 9

Date issued: 25 March 2020

Summary

The SEC's Division of Corporation Finance issued guidance that provides the SEC staff's views on disclosure and other securities law obligations that companies should consider with respect to COVID-19 and related business and market disruptions. The guidance includes a series of questions on a wide range of risks related to COVID-19 that companies should consider disclosing and their specific effects on the company, as well as how the company and management are responding to them.

The guidance also highlights the importance of considering these disclosure obligations when engaging in market activities, such as a company issuing or purchasing securities or an insider executing trades. The guidance reminds management to pay close attention to its obligations under the securities laws when it is in possession of material information about the effects of COVID-19 that has yet to be disclosed publicly. Regulation FD prohibits the selective disclosure of material nonpublic information, and corporate insiders are not allowed to trade on this information.

The guidance also acknowledges that a company may face difficulties in reporting financial results and provides an accommodation allowing a company that releases earnings estimates before filing with the SEC to reconcile a non-GAAP measure to the corresponding GAAP measure that includes provisional

amounts based on reasonable estimates or a range of results. The accommodation is limited to non-GAAP measures that management provides to the board of directors, and the other provisions of Item 10(e) of Regulation S-K and Regulation G continue to apply. In addition, a registrant that presents such a measure must explain, if practicable, why the GAAP item is incomplete and what additional information or analysis may be needed to complete it.

Other resources

- ▶ Technical Line, *How to appropriately use non-GAAP measures to discuss the effects of COVID-19*

SEC staff statement regarding Rule 302(b) of Regulation S-T in light of COVID-19 concerns

Date issued: 24 March 2020

Summary

Rule 302(b) of Regulation S-T requires each signatory to manually sign a signature page or other document that appears in typed form in documents filed electronically with the SEC. Due to the COVID-19 pandemic, the SEC staff said it will not recommend that the Commission take enforcement action related to an inability to comply with this requirement if certain conditions are met.

SEC staff guidance for conducting annual meetings in light of COVID-19 concerns

Date issued: 13 March 2020

Summary

Under the staff guidance, an issuer that has already mailed and filed its proxy materials can notify shareholders of a change in the date, time or location of its annual meeting, including plans to hold a “virtual” or “hybrid” meeting that allows remote participation, without mailing additional soliciting materials or amending its proxy materials if it performs all of the following:

- ▶ Issues a press release announcing the change
- ▶ Files the announcement as definitive additional soliciting material on EDGAR
- ▶ Takes all reasonable steps necessary to inform other intermediaries in the proxy process, such as proxy service providers, and other market participants, such as national securities exchanges, of the change

Issuers that have not yet mailed and filed their definitive proxy materials should consider whether to include disclosures that the date, time or location of the annual meeting could change due to COVID-19. The staff expects issuers that are planning to conduct a “virtual” or “hybrid” meeting to timely notify their shareholders and other market participants and provide clear instructions on how to participate.

The guidance encourages issuers to permit proponents of shareholder proposals to make presentations using alternative means, such as by phone, if they cannot attend in person. Further, if a shareholder proponent or his or her representative is unable to present a proposal due to any issues related to COVID-19, the staff would consider this to be “good cause” under Exchange Act Rule 14a-8(h), and the issuer may not use this lack of participation in the meeting as a basis to exclude the proposal for any meetings held during the following two calendar years.

Commission Guidance on Management's Discussion and Analysis of Financial Condition and Results of Operations (Release Nos. 33-10751; 34-88094; FR-87)

Date issued: 30 January 2020

Summary

The SEC issued guidance advising registrants to make appropriate disclosures about key performance indicators and other metrics they include in MD&A. The disclosures are broadly similar to certain disclosures required for non-GAAP measures, including why the metric is useful to investors and how management uses it. Registrants should evaluate whether the disclosure of estimates or assumptions underlying a metric or its calculation is necessary to make the presentation not misleading.

Effective date

The guidance was effective on 25 February 2020.

Other resources

- ▶ To the Point, *SEC issues guidance on disclosures about key performance indicators and other metrics in MD&A*

C&DIs on omitting discussion of the earliest year from MD&A

Date issued: 24 January 2020

Summary

The SEC Division of Corporation Finance issued three C&DIs related to the 2019 rule that amended Regulation S-K to allow registrants that provide three years of financial statements to omit discussion in MD&A of the earliest of the three years and cross-reference to the discussion in a previous filing. The C&DIs clarify that:

- ▶ MD&A discussion of the earliest of the three years may not be omitted when the discussion is necessary to an understanding of the registrant's financial condition, changes in financial condition and results of operations; however, if required, that discussion may be incorporated by reference.
- ▶ Cross-referencing to the MD&A discussion of the earliest of the three years in a previous filing does not incorporate the disclosure by reference into the current filing (i.e., the omitted discussion of the earliest year would not be considered part of the current filing unless that disclosure is explicitly incorporated by reference).
- ▶ A registration statement that incorporates Form 10-K by reference will contain only the MD&A that was included or incorporated by reference in the most recently filed Form 10-K.

Other SEC

2020 US GAAP financial reporting and SEC reporting taxonomies available for use

Summary

The SEC staff has updated the EDGAR system to allow companies to use the 2020 US GAAP financial reporting taxonomy (Taxonomy) and the 2020 SEC reporting taxonomy (SRT).

The 2020 Taxonomy contains updates for accounting standards and other improvements since last year, including changes in elements related to retirement benefits and variable interest entities. The 2020 SRT includes changes in labels as well as changes to definitions and new elements for revisions of prior periods and cumulative effects of accounting changes. The SEC staff strongly encourages companies to use the most recent version of the respective taxonomy for their submissions to take advantage of the most up-to-date tags.

Public Company Accounting Oversight Board

PCAOB proposed standards and other projects

Highlights of proposals previously issued

Potential Approach to Revisions to PCAOB Quality Control Standards (PCAOB Release No. 2019-003)

Date issued: 17 December 2019 – comment period ended 16 March 2020

Summary

The PCAOB issued a concept release seeking feedback on a potential approach to revising its quality control standards. The PCAOB is considering an integrated, risk-based framework that uses the quality management standard proposed by the International Auditing and Assurance Standards Board (IAASB) as a starting point.

Other resources

- ▶ Comment letter

Other proposals previously issued

- ▶ Supplemental Request for Comment: Proposed Amendments Relating to the Supervision of Audits Involving Other Auditors and Proposed Auditing Standard – Dividing Responsibility for the Audit with Another Accounting Firm (PCAOB Release No. 2017-005)
 - ▶ *Date issued: 26 September 2017 – comment period ended 15 November 2017*

Other PCAOB

PCAOB response to COVID-19

Date issued: 23 March 2020

Summary

In light of the coronavirus pandemic, the PCAOB is providing registered audit firms with relief from inspections for a period of up to 45 days, with the exception of giving the PCAOB access to audit documentation for certain engagements.

Note: The PCAOB issued a Spotlight publication on 2 April 2020 to provide reminders to auditors who are close to completing in-process audits of issuers and broker-dealers and are actively dealing with time-sensitive and complex auditing issues due to COVID-19. The reminders include references to the auditor's responsibilities to identify, assess and respond to risks of material misstatement, audit committee communications and the auditor's report.

Other resources

- *PCAOB Spotlight, COVID-19: Reminders for Audits Nearing Completion*

Auditing Standards Board

Final ASB guidance

Amendments to AU-C Sections 800, 805, and 810 to Incorporate Auditor Reporting Changes From SAS No. 134 (Statement on Auditing Standards No. 139)

Date issued: 10 March 2020

Summary

The amendments align the AU-C 800 series guidance with the auditor reporting provisions in Statement on Auditing Standards (SAS) No. 134, *Auditor Reporting and Amendments, Including Amendments Addressing Disclosures in the Audit of Financial Statements*, and other recently issued auditing standards.

SAS 139 amends (1) AU-C 800, *Special Considerations – Audits of Financial Statements Prepared in Accordance With Special Purpose Frameworks*; (2) AU-C 805, *Special Considerations – Audits of Single Financial Statements and Specific Elements, Accounts, or Items of a Financial Statement*; and (3) AU-C 810, *Engagements to Report on Summary Financial Statements*.

Effective date

The amendments to AU-C 800 are effective for audits of financial statements prepared in accordance with a special purpose framework for periods ending on or after 15 December 2020. The amendments to AU-C 805 are effective for audits of single financial statements and specific elements, accounts or items of a financial statement as of or for periods ending on or after 15 December 2020. The amendments to AU-C 810 are effective for engagements to report on summary financial statements for periods ending on or after 15 December 2020. Early implementation is not permitted.

ASB exposure drafts

Highlights of proposals previously issued

Amendments to AU-C sections 725, 730, 930, 935, and 940

Date issued: 10 December 2019 – comment period ended 10 February 2020

Summary

The ASB proposed amendments that would conform various sections of its codification to its recently issued standards on auditor reporting (SAS No. 134), the auditor's responsibilities relating to other information included in annual reports (SAS No. 137) and the amendments to the description of the concept of materiality (SAS No. 138). The AU-C sections that would be amended by the proposed SAS include:

- ▶ AU-C Section 725, *Supplementary Information in Relation to the Financial Statements as a Whole*
- ▶ AU-C Section 730, *Required Supplementary Information*
- ▶ AU-C Section 930, *Interim Financial Information*
- ▶ AU-C Section 935, *Compliance Audits*
- ▶ AU-C Section 940, *An Audit of Internal Control Over Financial Reporting That Is Integrated With an Audit of Financial Statements*

The proposed SAS would also amend certain AU-C sections to reflect practice issues that have arisen since the most recent revisions to them. Most notably, the proposal would revise AU-C section 935 to reflect recent developments in the compliance arena, such as the issuance of *Title 2 U.S. Code of Federal Regulations Part 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*, changes in the Office of Management and Budget Compliance Supplement, and issuance of the Yellow Book.

In March 2020, the ASB voted to issue the SAS as a final standard.

Effective date

The amendments to AU-C sections 725, 730, 935 and 940 would be effective for audits for fiscal periods ending on or after 15 December 2020. The amendments to AU-C section 930 would be effective for reviews of interim financial information for interim periods of fiscal years beginning on or after 15 December 2020. Early implementation is not permitted.

Other resources

- ▶ Comment letter

Auditing Accounting Estimates and Related Disclosures

Date issued: 22 August 2019 – comment period ended 22 November 2019

Summary

The proposal would require specific risk assessment procedures for estimates, including fair value measurements, that address the increasingly complex business environment and the complexity in financial reporting frameworks. The proposal also would emphasize the need for professional skepticism when auditing estimates because they generally involve assumptions and estimation uncertainty that make them susceptible to misstatement due to management bias.

In developing the proposal, the ASB considered revisions to auditing standards on estimates made by the IAASB and the PCAOB.

Effective date

The guidance would be effective for audits of financial statements for periods ending on or after 15 December 2022.

Other resources

- Comment letter

Audit Evidence

Date issued: 20 June 2019 – comment period ended 18 September 2019

Summary

The proposal would clarify what constitutes audit evidence in an audit of financial statements. Auditors would be required to consider certain factors when evaluating information to be used as audit evidence, and the definition of the sufficiency of audit evidence would be modified to focus on the persuasiveness of the evidence rather than the quantity of the evidence. The attributes and factors that an auditor would need to consider when evaluating evidence would include the information's source, relevance and reliability, and whether the information corroborates or contradicts the assertions in the financial statements.

The proposal also would address the expanding sources of information that could be used as audit evidence, provide examples of emerging technologies (e.g., audit data analytics) that may be used by an auditor and describe activities undertaken by an auditor to more clearly demonstrate the application of professional skepticism.

Effective date

The guidance would be effective for audits of financial statements for periods beginning on or after 15 June 2021.

Other resources

- Comment letter

Revisions to Statement on Standards for Attestation Engagements No. 18, Attestation Standards: Clarification and Recodification

Date issued: 11 July 2018 – comment period ended 11 October 2018

Summary

The proposed Statement on Standards for Attestation Engagements (SSAE) would change all ASB attestation standards to align them more closely with international standards.

The proposal would eliminate the requirement for an accountant to request a written assertion from the responsible party when reporting on the subject matter for examination and review engagements. A written assertion from the responsible party would be required only if the accountant is opining or concluding on the assertion of the responsible party or performing an examination of controls at a service organization, known as a SOC 1 examination. However, the accountant would be required to request a representation from the responsible party acknowledging responsibility for the subject matter in accordance with the specified criteria.

The proposal also would change the name of review engagements to limited assurance engagements and expand the guidance on the types of procedures that can be performed beyond the description of inquiries and analytical procedures that exist today. Under the proposal, accountants would be permitted to express an adverse conclusion if they conclude that misstatements, individually or in the aggregate, are both material and pervasive to the subject matter. As a result, accountants would no longer be required to withdraw from such an engagement. For all review reports, accountants would also have to include a description of the work performed as the basis for their conclusion.

The proposed SSAE also would make revisions to AT-C section 215, *Agreed-Upon Procedures Engagements*. In November 2019 the ASB issued SSAE No. 19, *Agreed-Upon Procedures Engagements*, which finalized that portion of the project.

Effective date

The effective date has not been determined.

Other resources

- *To the Point, AICPA proposes changes to standards on agreed-upon procedures and other attestation engagements*
- Comment letter

Other ASB

Relief in light of COVID-19

Summary

The ASB said it will be holding a special open meeting on 20 April 2020 to discuss and vote on deferring the effective date of SAS Nos. 134-140 by a year in response to the COVID-19 pandemic. The SASs would be effective for audits of financial statements for periods ending on or after 15 December 2021, instead of on or after 15 December 2020, although earlier implementation would be permitted.

AICPA – other

Final standards

Statement on Standards for Accounting and Review Services, Materiality in a Review of Financial Statements and Adverse Conclusions (SSARS No. 25)

Date issued: 11 February 2020

Summary

Statement on Standards for Accounting and Review Services (SSARS) No. 25 amends AR-C sections 60, 70, 80 and 90 and further converges AR-C section 90, *Review of Financial Statements*, with international standards. It also better aligns certain concepts in the SSARSs, such as materiality, with those in the auditing standards.

Effective date

SSARS No. 25 is effective for engagements performed in accordance with SSARSs for periods ending on or after 15 December 2021. Early implementation is permitted.

Other AICPA guidance

AICPA issues criteria for describing and reporting on controls over a production or manufacturing system

Date issued: 11 March 2020

The American Institute of Certified Public Accountants (AICPA) issued a set of criteria that establishes a framework for suppliers to prepare a description of a system used to manufacture, produce or distribute goods in a System and Organization Controls (SOC) for supply chain report. The report would provide information useful to customers and business partners of suppliers, particularly those from the automotive and transportation, consumer, diversified industrial products, life sciences, mining and metals, oil and gas, and technology sectors when managing their supply chain risk. The framework also provides suppliers with a basis for engaging an independent certified public accountant to provide an opinion on the information provided and controls over the system.

Other resources

- To the Point, *AICPA issues criteria for describing and reporting on controls over a production or manufacturing system*

AICPA issues criteria for describing a set of data and evaluating its integrity

Date issued: 23 January 2020

The AICPA issued criteria that management, boards of directors, internal auditors and other stakeholders, such as suppliers, can use to evaluate the integrity of data used in decision making. The criteria focus on whether a description of the set of data accurately presents the contents of the set and provide users of the data with the context that will enable them to better understand the data. A company that provides data to stakeholders can engage an independent public accountant to use the criteria to perform attestation procedures and provide a report to stakeholders to increase their confidence in decisions they make based on that data.

Other resources

- To the Point, *AICPA issues criteria for describing a set of data and evaluating its integrity*

Governmental Accounting Standards Board

Final GASB guidance

GASB Statement No. 92, Omnibus 2020

Date issued: 5 February 2020

Summary

The final guidance addresses accounting and financial reporting issues identified during the implementation and application of certain GASB pronouncements. Statement 92 covers issues related to leases, intra-entity transfers of assets, postemployment benefits, government acquisitions, risk financing and insurance-related activities of public entity risk pools, fair value measurements and derivative instruments.

Effective date

Certain requirements were effective upon issuance, while others are effective for fiscal years or reporting periods beginning after 15 June 2020. Earlier application is encouraged and permitted by topic.



Final guidance expected soon

The GASB has completed deliberations on the following proposals and is expected to issue final guidance soon.

Replacement of Interbank Offered Rates

Date proposal issued: 26 September 2019 – comment period ended 27 November 2019

Summary

The proposed guidance would help state and local governments in the anticipated transition away from LIBOR and other interbank offered rates to alternative reference rates. The proposal would:

- ▶ Allow governments to continue using hedge accounting for certain hedging derivative instruments that are amended or replaced to change the reference rate of the hedging derivative instrument's variable payment from an interbank offered rate
- ▶ Clarify the hedge accounting termination provisions when an interbank offered rate is replaced as a reference rate of a hedged item
- ▶ Clarify that the uncertainty associated with reference rate reform does not, by itself, affect the probability that a hedged expected transaction will occur
- ▶ Remove LIBOR as an appropriate benchmark interest rate for the qualitative evaluation of the effectiveness of an interest rate swap
- ▶ Add the Secured Overnight Financing Rate and the Effective Federal Funds Rate as appropriate benchmark interest rates
- ▶ Clarify the definition of reference rate
- ▶ Provide an exception to the guidance on lease modifications in Statement 87 for certain lease contract amendments related to interbank offered rates

Effective date

The GASB subsequently decided that the removal of LIBOR as an appropriate benchmark interest rate will be effective for reporting periods beginning after 31 December 2021. All other requirements of the proposed guidance will be effective for reporting periods beginning after 15 June 2020. Earlier application is encouraged.

Note: GASB Statement No. 93 was issued on 2 April 2020.

Public-Private and Public-Public Partnerships and Availability Payment Arrangements

Date proposal issued: 13 June 2019 – comment period ended 13 September 2019

Summary

The proposed guidance would apply to public-private and public-public partnership arrangements that are outside of the scope of the GASB's existing guidance for these transactions in Statement No. 60, *Accounting and Financial Reporting for Service Concession Arrangements*, and Statement 87, *Leases*. The proposal also would make certain improvements to the guidance in Statement 60 and provide accounting and financial reporting guidance for availability payment arrangements.

Effective date

The GASB subsequently decided that the guidance would be effective for fiscal years beginning after 15 June 2022 and all reporting periods thereafter. Earlier application would be encouraged.

Note: In March 2020, the GASB voted to issue a final standard.

GASB exposure drafts

Issued this quarter

Certain Component Unit Criteria, and Accounting and Financial Reporting for Internal Revenue Code Section 457 Deferred Compensation Plans, an amendment of GASB Statements No. 14 and No. 84, and a supersession of GASB Statement No. 32

Date issued: 9 March 2020 – comment period ends 10 April 2020

Summary

The proposal is designed to mitigate financial reporting costs associated with certain defined contribution pension plans, defined contribution other postemployment benefit plans, and other employee benefit plans. It would enhance the relevance, consistency and comparability of accounting and financial reporting for Section 457 deferred compensation plans that meet the definition of a pension plan and for benefits provided through those plans. It would also supersede the remaining provisions of GASB Statement No. 32, *Accounting and Financial Reporting for Internal Revenue Code Section 457 Deferred Compensation Plans*, as amended, for all Section 457 plans.

Effective date

Some proposed requirements would be effective immediately, while others would be effective for fiscal years or reporting periods beginning after 15 June 2021. Earlier application of the latter requirements would be encouraged and permitted by requirement as specified.

Communication Methods in General Purpose External Financial Reports That Contain Basic Financial Statements: Notes to Financial Statements, an amendment of GASB Concepts Statement No. 3

Date issued: 21 February 2020 – comment period ends 30 June 2020

Summary

The proposed concepts statement would provide a framework to be used for establishing accounting and financial reporting requirements for notes included in the financial statements of state and local governments. The proposed concepts would replace the existing criteria for disclosing information in notes to financial statements and elaborate on the types of information that should be disclosed in the notes and the types of information that should not be disclosed.

Proposals previously issued

- ▶ Implementation Guidance Update – 2020
 - ▶ *Date issued: 4 December 2019 – comment period ended 31 January 2020*
- ▶ Subscription-Based Information Technology Arrangements
 - ▶ *Date issued: 21 May 2019 – comment period ended 23 August 2019*

Other GASB

Relief in light of COVID-19

Summary

The GASB is reviewing a proposed Statement that would postpone the effective dates of provisions in certain pronouncements in response to the COVID-19 pandemic. The GASB is also considering the potential effects of COVID-19 on its standard-setting activities.

Preliminary Views, Financial Reporting Model Improvements

Date issued: 28 September 2018 – comment period ended 15 February 2019

Summary

The GASB issued its Preliminary Views on targeted improvements to the financial reporting model. The proposed changes would include (1) a short-term financial resources measurement focus for government funds that recognizes short-term transactions and other events when incurred and long-term transactions and other events when due, (2) a format for government fund financial statements that distinguishes between current and long-term resource flows, (3) an additional subtotal and proprietary funds financial statements for operating income (loss) and noncapital subsidies, and (4) the presentation of all budgetary comparison information as required supplementary information and the presentation of two variance columns. The document also contains alternative views.

The GASB held public hearings and user forums on the topic in the first quarter of 2019.

Preliminary Views, Recognition of Elements of Financial Statements

Date issued: 28 September 2018 – comment period ended 15 February 2019

Summary

The GASB issued its Preliminary Views on concepts related to the recognition of elements of financial statements, such as assets and liabilities. The GASB proposed that an item being considered for recognition in the financial statements would be evaluated using a hierarchy for recognition of elements. The GASB also proposed a recognition framework for both the short-term financial resources measurement focus and the economic resources measurement focus. The document also contains alternative views.

The GASB held public hearings and user forums on the topic in the first quarter of 2019.

Invitation to Comment, Revenue and Expense Recognition

Date issued: 1 February 2018 – comment period ended 27 April 2018

Summary

The GASB issued an Invitation to Comment (ITC) on the development of comprehensive revenue and expense recognition guidance for state and local governments. The ITC discusses an exchange/nonexchange model that would classify revenue and expense transactions based on whether they are considered an exchange or nonexchange transaction, and a performance obligation/no performance obligation model that would classify revenue and expense transactions based on whether a binding agreement contains one or more performance obligations.

What's next – agenda highlights

The GASB's agenda also includes:

- ▶ Compensated absences – Reexamination of Statement 16
- ▶ Prior period adjustments, accounting changes, and error corrections – Reexamination of Statement 62
- ▶ Postponement of the effective dates of certain authoritative guidance

Effective date matrices

Effective date matrix – final FASB pronouncements

Note: Early adoption generally is permitted unless otherwise noted.

Effective in 2020 for public ¹ calendar year-end entities ²		
ASU 2020-04	Reference Rate Reform (Topic 848), Facilitation of the Effects of Reference Rate Reform on Financial Reporting	Effective upon issuance (12 March 2020) and generally can be applied through 31 December 2022.
ASU 2020-03	Codification Improvements to Financial Instruments	Amendments related to ASU 2019-04: Effective for fiscal years beginning after 15 December 2019, including interim periods within those fiscal years. Early adoption is not permitted before an entity's adoption of ASU 2016-01. Amendments related to ASU 2016-13, for entities that have not yet adopted that guidance: Effective upon adoption of the amendments in ASU 2016-13. Early adoption is not permitted before an entity's adoption of ASU 2016-13. Amendments related to ASU 2016-13, for entities that have adopted that guidance: Effective for fiscal years beginning after 15 December 2019, including interim periods within those years. Other amendments: Effective upon issuance (9 March 2020).
ASU 2020-02	Financial Instruments – Credit Losses (Topic 326) and Leases (Topic 842) – Amendments to SEC Paragraphs Pursuant to SEC Staff Accounting Bulletin No. 119 and Update to SEC Section on Effective Date Related to Accounting Standards Update No. 2016-02, Leases (Topic 842) (SEC Update)	Effective upon issuance (6 February 2020). See SEC releases for effective date information. ³
ASU 2019-11	Codification Improvements to Topic 326, Financial Instruments – Credit Losses	Entities that have not yet adopted ASU 2016-13: Effective upon adoption of the amendments in ASU 2016-13. Early adoption is not permitted before an entity's adoption of ASU 2016-13. Entities that have adopted ASU 2016-13: Effective for fiscal years beginning after 15 December 2019, including interim periods within those fiscal years.
ASU 2019-08	Compensation – Stock Compensation (Topic 718) and Revenue from Contracts with Customers (Topic 606), Codification Improvements – Share-Based Consideration Payable to a Customer	Effective for fiscal years beginning after 15 December 2019, including interim periods within those fiscal years. Early adoption is not permitted before an entity's adoption of ASU 2018-07.
ASU 2019-05	Financial Instruments – Credit Losses (Topic 326), Targeted Transition Relief	Entities that have not yet adopted ASU 2016-13: Effective upon adoption of the amendments in ASU 2016-13. Early adoption is not permitted before an entity's adoption of ASU 2016-13. Entities that have adopted ASU 2016-13: Effective for fiscal years beginning after 15 December 2019, including interim periods within those fiscal years.

¹ Refer to each ASU to determine which types of entities (e.g., public business entities, not-for-profits, employee benefit plans) are subject to these effective dates.

² The Jumpstart Our Business Startups Act allows emerging growth companies to follow private company effective dates for new or revised accounting standards issued after 5 April 2012. However, an emerging growth company must follow public company effective dates for all such standards if it has disclosed an election to do so.

³ This ASU adds or amends SEC paragraphs in the Codification that describe SEC guidance or SEC staff views that the FASB includes as a convenience to Codification users.

Effective in 2020 for public ¹ calendar year-end entities ²		
ASU 2019-04	Codification Improvements to Topic 326, Financial Instruments – Credit Losses, Topic 815, Derivatives and Hedging, and Topic 825, Financial Instruments	<p>Amendments related to ASU 2016-13, for entities that have not yet adopted that guidance: Effective upon adoption of the amendments in ASU 2016-13. Early adoption is not permitted before an entity's adoption of ASU 2016-13.</p> <p>Amendments related to ASU 2016-13, for entities that have adopted that guidance: Effective for fiscal years beginning after 15 December 2019, including interim periods within those fiscal years.</p> <p>Amendments related to ASU 2017-12, for entities that have not yet adopted that guidance: Effective upon adoption of the amendments in ASU 2017-12. Early adoption is not permitted before an entity's adoption of ASU 2017-12.</p> <p>Amendments related to ASU 2017-12, for entities that have adopted that guidance: Effective as of the beginning of the first annual reporting period beginning after issuance of this ASU (25 April 2019).</p> <p>Amendments related to ASU 2016-01: Effective for fiscal years beginning after 15 December 2019, including interim periods within those fiscal years. Early adoption is not permitted before an entity's adoption of ASU 2016-01.</p>
ASU 2019-03	Not-for-Profit Entities (Topic 958), Updating the Definition of <i>Collections</i>	Effective for annual periods beginning after 15 December 2019, and interim periods within annual periods beginning after 15 December 2020.
ASU 2019-02	Entertainment – Films – Other Assets – Film Costs (Subtopic 926-20) and Entertainment – Broadcasters – Intangibles – Goodwill and Other (Subtopic 920-350), Improvements to Accounting for Costs of Films and License Agreements for Program Materials	Effective for fiscal years, and interim periods within those fiscal years, beginning after 15 December 2019.
ASU 2019-01	Leases (Topic 842), Codification Improvements	<p>Amendments to clarify transition disclosure requirements: Effective upon adoption of the amendments in ASU 2016-02.</p> <p>Other amendments: Effective for fiscal years beginning after 15 December 2019, and interim periods within those fiscal years.</p>
ASU 2018-19	Codification Improvements to Topic 326, Financial Instruments – Credit Losses	Effective upon adoption of the amendments in ASU 2016-13.
ASU 2018-18	Collaborative Arrangements (Topic 808), Clarifying the Interaction between Topic 808 and Topic 606	Effective for fiscal years beginning after 15 December 2019, including interim periods within those fiscal years. Early adoption is not permitted before an entity's adoption of ASC 606.
ASU 2018-17	Consolidation (Topic 810), Targeted Improvements to Related Party Guidance for Variable Interest Entities	Effective for fiscal years beginning after 15 December 2019, including interim periods within those fiscal years.
ASU 2018-15	Intangibles – Goodwill and Other – Internal-Use Software (Subtopic 350-40), Customer's Accounting for Implementation Costs Incurred in a Cloud Computing Arrangement That Is a Service Contract	Effective for annual periods, including interim periods within those annual periods, beginning after 15 December 2019.
ASU 2018-14	Compensation – Retirement Benefits – Defined Benefit Plans – General (Subtopic 715-20), Disclosure Framework – Changes to the Disclosure Requirements for Defined Benefit Plans	Effective for financial statements issued for fiscal years ending after 15 December 2020.
ASU 2018-13	Fair Value Measurement (Topic 820), Disclosure Framework – Changes to the Disclosure Requirements for Fair Value Measurement	Effective for fiscal years, and interim periods within those years, beginning after 15 December 2019.

Effective in 2020 for public¹ calendar year-end entities²		
ASU 2017-04	Intangibles – Goodwill and Other (Topic 350), Simplifying the Test for Goodwill Impairment	SEC filers, excluding smaller reporting companies (SRCs): Effective for annual and any interim impairment tests performed for periods beginning after 15 December 2019. ⁴ Other entities: Effective for annual and any interim impairment tests performed for periods beginning after 15 December 2022. ⁴
ASU 2016-13	Financial Instruments – Credit Losses (Topic 326), Measurement of Credit Losses on Financial Instruments	SEC filers, excluding SRCs: Effective for fiscal years beginning after 15 December 2019, including interim periods within those fiscal years. ⁵ Other entities: Effective for fiscal years beginning after 15 December 2022, including interim periods within those fiscal years. ⁵ Earlier application is permitted only for fiscal years beginning after 15 December 2018, including interim periods within those fiscal years.
Effective after 2020 for public¹ calendar year-end entities²		
ASU 2020-01	Investments – Equity Securities (Topic 321), Investments – Equity Method and Joint Ventures (Topic 323), and Derivatives and Hedging (Topic 815) – Clarifying the Interactions between Topic 321, Topic 323, and Topic 815	Effective for fiscal years, and interim periods within those fiscal years, beginning after 15 December 2020.
ASU 2019-12	Income Taxes (Topic 740), Simplifying the Accounting for Income Taxes	Effective for fiscal years beginning after 15 December 2020, and interim periods within those fiscal years.
ASU 2018-12	Financial Services – Insurance (Topic 944), Targeted Improvements to the Accounting for Long-Duration Contracts	SEC filers, excluding SRCs: Effective for fiscal years beginning after 15 December 2021, and interim periods within those fiscal years. ⁶ Other SEC filers: Effective for fiscal years beginning after 15 December 2023, and interim periods within fiscal years beginning after 15 December 2024. ⁶
Effective in 2020 for nonpublic⁷ calendar year-end entities		
ASU 2020-04	Reference Rate Reform (Topic 848), Facilitation of the Effects of Reference Rate Reform on Financial Reporting	Effective upon issuance (12 March 2020) and generally can be applied through 31 December 2022.
ASU 2020-03	Codification Improvements to Financial Instruments	Amendments related to ASU 2019-04: Effective for fiscal years beginning after 15 December 2019, including interim periods within those fiscal years. Early adoption is not permitted before an entity's adoption of ASU 2016-01. Amendments related to ASU 2016-13, for entities that have not yet adopted that guidance: Effective upon adoption of the amendments in ASU 2016-13. Early adoption is not permitted before an entity's adoption of ASU 2016-13. Amendments related to ASU 2016-13, for entities that have adopted that guidance: Effective for fiscal years beginning after 15 December 2019, including interim periods within those years. Other amendments: Effective for fiscal years beginning after 15 December 2019, and interim periods within fiscal years beginning after 15 December 2020.

⁴ ASU 2019-10 deferred these effective dates to align them with the new effective dates of the new credit losses standard.

⁵ ASU 2019-10 deferred the effective date of the new credit losses standard for all entities except SEC filers that are not SRCs.

⁶ ASU 2019-09 deferred the effective dates of the new standard on long-duration insurance contracts for all entities.

⁷ Refer to each ASU to determine which types of entities (e.g., private companies, not-for-profits, employee benefit plans) are subject to these effective dates.

Effective in 2020 for nonpublic ⁷ calendar year-end entities		
ASU 2019-08	Compensation – Stock Compensation (Topic 718) and Revenue from Contracts with Customers (Topic 606), Codification Improvements – Share-Based Consideration Payable to a Customer	<p>Entities that have adopted ASU 2018-07: Effective for fiscal years beginning after 15 December 2019, including interim periods within those fiscal years.</p> <p>Entities that have not yet adopted ASU 2018-07: Effective for fiscal years beginning after 15 December 2019, and interim periods within fiscal years beginning after 15 December 2020.</p> <p>Early adoption is not permitted before an entity's adoption of ASU 2018-07.</p>
ASU 2019-04	Codification Improvements to Topic 326, Financial Instruments – Credit Losses, Topic 815, Derivatives and Hedging, and Topic 825, Financial Instruments	<p>Amendments related to ASU 2016-13, for entities that have not yet adopted that guidance: Effective upon adoption of the amendments in ASU 2016-13. Early adoption is not permitted before an entity's adoption of ASU 2016-13.</p> <p>Amendments related to ASU 2016-13, for entities that have adopted that guidance: Effective for fiscal years beginning after 15 December 2019, including interim periods within those fiscal years.</p> <p>Amendments related to ASU 2017-12, for entities that have not yet adopted that guidance: Effective upon adoption of the amendments in ASU 2017-12. Early adoption is not permitted before an entity's adoption of ASU 2017-12.</p> <p>Amendments related to ASU 2017-12, for entities that have adopted that guidance: Effective as of the beginning of the first annual reporting period beginning after issuance of this ASU (25 April 2019).</p> <p>Amendments related to ASU 2016-01: Effective for fiscal years beginning after 15 December 2019, including interim periods within those fiscal years. Early adoption is not permitted before an entity's adoption of ASU 2016-01.</p>
ASU 2019-03	Not-for-Profit Entities (Topic 958), Updating the Definition of <i>Collections</i>	Effective for annual periods beginning after 15 December 2019, and interim periods within annual periods beginning after 15 December 2020.
ASU 2018-13	Fair Value Measurement (Topic 820), Disclosure Framework – Changes to the Disclosure Requirements for Fair Value Measurement	Effective for fiscal years, and interim periods within those years, beginning after 15 December 2019.
ASU 2018-09	Codification Improvements	<p>Amendments that do not have transition guidance: Effective upon issuance (16 July 2018).</p> <p>Amendments to ASC 740: Effective upon adoption of the amendments in ASU 2016-16.</p> <p>Certain amendments to ASC 820 and ASC 944: Effective upon adoption of the amendments in ASU 2016-01.</p> <p>Other amendments that are subject to transition guidance: Effective for annual periods beginning after 15 December 2019, and interim periods within annual periods beginning after 15 December 2020.</p>
ASU 2018-08	Not-for-Profit Entities (Topic 958), Clarifying the Scope and the Accounting Guidance for Contributions Received and Contributions Made	<p>Resource recipients: Effective for annual periods beginning after 15 December 2018, and interim periods within annual periods beginning after 15 December 2019.</p> <p>Resource providers: Effective for annual periods beginning after 15 December 2019, and interim periods within annual periods beginning after 15 December 2020.</p>
ASU 2018-07	Compensation – Stock Compensation (Topic 718), Improvements to Nonemployee Share-Based Payment Accounting	Effective for fiscal years beginning after 15 December 2019, and interim periods within fiscal years beginning after 15 December 2020. Early adoption is not permitted before an entity's adoption of ASC 606.

Effective in 2020 for nonpublic⁷ calendar year-end entities

ASU 2017-11	Earnings Per Share (Topic 260); Distinguishing Liabilities from Equity (Topic 480); Derivatives and Hedging (Topic 815), (Part I) Accounting for Certain Financial Instruments with Down Round Features, (Part II) Replacement of the Indefinite Deferral for Mandatorily Redeemable Financial Instruments of Certain Nonpublic Entities and Certain Mandatorily Redeemable Noncontrolling Interests with a Scope Exception	Amendments in Part I: Effective for fiscal years beginning after 15 December 2019, and interim periods within fiscal years beginning after 15 December 2020. Amendments in Part II: Transition is not required.
ASU 2017-08	Receivables – Nonrefundable Fees and Other Costs (Subtopic 310-20), Premium Amortization on Purchased Callable Debt Securities	Effective for fiscal years beginning after 15 December 2019, and interim periods within fiscal years beginning after 15 December 2020.

Effective after 2020 for nonpublic⁷ calendar year-end entities

ASU 2020-01	Investments – Equity Securities (Topic 321), Investments – Equity Method and Joint Ventures (Topic 323), and Derivatives and Hedging (Topic 815) – Clarifying the Interactions between Topic 321, Topic 323, and Topic 815	Effective for fiscal years, and interim periods within those fiscal years, beginning after 15 December 2021.
ASU 2019-12	Income Taxes (Topic 740), Simplifying the Accounting for Income Taxes	Effective for fiscal years beginning after 15 December 2021, and interim periods within fiscal years beginning after 15 December 2022.
ASU 2019-11	Codification Improvements to Topic 326, Financial Instruments – Credit Losses	Entities that have not yet adopted ASU 2016-13: Effective upon adoption of the amendments in ASU 2016-13. Early adoption is not permitted before an entity's adoption of ASU 2016-13. Entities that have adopted ASU 2016-13: Effective for fiscal years beginning after 15 December 2019, including interim periods within those fiscal years.
ASU 2019-05	Financial Instruments – Credit Losses (Topic 326), Targeted Transition Relief	Entities that have not yet adopted ASU 2016-13: Effective upon adoption of the amendments in ASU 2016-13. Early adoption is not permitted before an entity's adoption of ASU 2016-13. Entities that have adopted ASU 2016-13: Effective for fiscal years beginning after 15 December 2019, including interim periods within those fiscal years.
ASU 2019-02	Entertainment – Films – Other Assets – Film Costs (Subtopic 926-20) and Entertainment – Broadcasters – Intangibles – Goodwill and Other (Subtopic 920-350), Improvements to Accounting for Costs of Films and License Agreements for Program Materials	Effective for fiscal years, and interim periods within those fiscal years, beginning after 15 December 2020.
ASU 2019-01	Leases (Topic 842), Codification Improvements	Amendments to clarify transition disclosure requirements: Effective upon adoption of the amendments in ASU 2016-02. Other amendments: Effective for fiscal years beginning after 15 December 2020, and interim periods within fiscal years beginning after 15 December 2021. ⁸

⁸ ASU 2019-10 deferred the effective date for its new standard on leases for entities that are not public business entities; not not-for-profit entities that have issued, or are conduit bond obligors for, certain securities; and not employee benefit plans that file or furnish financial statements with or to the SEC.

Effective after 2020 for nonpublic ⁷ calendar year-end entities		
ASU 2018-20	Leases (Topic 842), Narrow-Scope Improvements for Lessors	Entities that have not yet adopted ASC 842: Effective upon adoption of the amendments in ASU 2016-02. Entities that have adopted ASC 842: May apply the amendments either in the first reporting period ending or beginning after the issuance of the ASU (10 December 2018) or on the date they would have been required to adopt ASC 842.
ASU 2018-19	Codification Improvements to Topic 326, Financial Instruments – Credit Losses	Effective upon adoption of the amendments in ASU 2016-13.
ASU 2018-18	Collaborative Arrangements (Topic 808), Clarifying the Interaction between Topic 808 and Topic 606	Effective for fiscal years beginning after 15 December 2020, and interim periods within fiscal years beginning after 15 December 2021. Early adoption is not permitted before an entity's adoption of ASC 606.
ASU 2018-17	Consolidation (Topic 810), Targeted Improvements to Related Party Guidance for Variable Interest Entities	Effective for fiscal years beginning after 15 December 2020, and interim periods within fiscal years beginning after 15 December 2021.
ASU 2018-16	Derivatives and Hedging (Topic 815), Inclusion of the Secured Overnight Financing Rate (SOFR) Overnight Index Swap (OIS) Rate as a Benchmark Interest Rate for Hedge Accounting Purposes	Entities that have not yet adopted ASU 2017-12: Effective upon adoption of the amendments in ASU 2017-12. Early adoption is not permitted before an entity's adoption of ASU 2017-12. Entities that have adopted ASU 2017-12: Effective for fiscal years beginning after 15 December 2019, and interim periods within those fiscal years.
ASU 2018-15	Intangibles – Goodwill and Other – Internal-Use Software (Subtopic 350-40), Customer's Accounting for Implementation Costs Incurred in a Cloud Computing Arrangement That Is a Service Contract	Effective for annual periods beginning after 15 December 2020, and interim periods in annual periods beginning after 15 December 2021.
ASU 2018-14	Compensation – Retirement Benefits – Defined Benefit Plans – General (Subtopic 715-20), Disclosure Framework – Changes to the Disclosure Requirements for Defined Benefit Plans	Effective for financial statements issued for fiscal years ending after 15 December 2021.
ASU 2018-12	Financial Services – Insurance (Topic 944), Targeted Improvements to the Accounting for Long-Duration Contracts	Effective for fiscal years beginning after 15 December 2023, and interim periods within fiscal years beginning after 15 December 2024. ⁶
ASU 2018-11	Leases (Topic 842), Targeted Improvements	Entities that have not yet adopted ASC 842: Effective upon adoption of the amendments in ASU 2016-02. Entities that have adopted ASC 842: May apply the lessor expedient either in the first reporting period following the issuance of the ASU (30 July 2018) or on the date they would have been required to adopt ASC 842.
ASU 2018-10	Codification Improvements to Topic 842, Leases	Entities that have not yet adopted ASC 842: Effective upon adoption of the amendments in ASU 2016-02. Entities that have adopted ASC 842: Effective upon issuance (18 July 2018).
ASU 2018-01	Leases (Topic 842), Land Easement Practical Expedient for Transition to Topic 842	Effective upon adoption of the amendments in ASU 2016-02.
ASU 2017-12	Derivatives and Hedging (Topic 815), Targeted Improvements to Accounting for Hedging Activities	Effective for fiscal years beginning after 15 December 2020, and interim periods within fiscal years beginning after 15 December 2021. ⁹

⁹ ASU 2019-10 deferred the effective date for its new standard on hedging for entities that are not public business entities.

Effective after 2020 for nonpublic⁷ calendar year-end entities

ASU 2017-04	Intangibles – Goodwill and Other (Topic 350), Simplifying the Test for Goodwill Impairment	Effective for annual and any interim impairment tests performed for periods beginning after 15 December 2022. ⁴
ASU 2016-13	Financial Instruments – Credit Losses (Topic 326), Measurement of Credit Losses on Financial Instruments	Effective for fiscal years beginning after 15 December 2022, including interim periods within those fiscal years. ⁵ Earlier application is permitted only for fiscal years beginning after 15 December 2018, including interim periods within those fiscal years.
ASU 2016-02	Leases (Topic 842)	Effective for fiscal years beginning after 15 December 2020, and interim periods within fiscal years beginning after 15 December 2021. ⁸

Effective date matrix – final SEC pronouncements and interpretive releases

Title	Effective date
Amendments to the Accelerated Filer and Large Accelerated Filer Definitions	Effective 27 April 2020.
Financial Disclosures about Guarantors and Issuers of Guaranteed Securities and Affiliates Whose Securities Collateralize a Registrant's Securities	Effective 4 January 2021, but earlier compliance is permitted.
Solicitations of Interest Prior to a Registered Public Offering	3 December 2019.
Exchange-Traded Funds	Effective 23 December 2019, but there will be a one-year transition period for compliance with the form amendments.
Auditor Independence With Respect to Certain Loans or Debtor-Creditor Relationships	3 October 2019.
FAST Act Modernization and Simplification of Regulation S-K	The provisions related to the redaction of confidential information in exhibits are effective 2 April 2019, and the provisions requiring XBRL data tagging of all information on the cover pages of specified forms are subject to a three-year phase-in, depending on the registrant's filing status. All other provisions are effective 2 May 2019.
Disclosure of Hedging by Employees or Directors	Registrants other than SRCs and EGCs must provide the disclosures during fiscal years beginning on or after 1 July 2019. SRCs and EGCs must provide the disclosures during fiscal years beginning on or after 1 July 2020.
Amendments to Regulation A	31 January 2019.
Modernization of Property Disclosures for Mining Registrants	25 February 2019.
Optional Internet Availability of Investment Company Shareholder Reports	1 January 2019, with certain exceptions.
Inline XBRL Filing of Tagged Data	Operating companies filing as large accelerated, accelerated and non-accelerated filers are required to comply beginning with fiscal periods ending on or after 15 June 2019, 2020 and 2021, respectively. Larger mutual funds (i.e., funds with net assets of \$1 billion or more as of the end of the most recent fiscal year) have to comply two years after the rule becomes effective. Smaller mutual funds have to comply with the requirement three years after the rule becomes effective.
Investment Company Liquidity Risk Management Programs	Fund complexes with net assets of \$1 billion or more are required to comply with the liquidity risk management program requirements starting 1 June 2019, while those with less than \$1 billion in net assets have to do so starting 1 December 2019.
Investment Companies Reporting Modernization	The amendments to Regulation S-X are effective for periods ending on or after 1 August 2017. The compliance date for Form N-CEN is 1 June 2018. The compliance date for Form N-PORT was delayed to 1 March 2019 for larger fund complexes and 1 March 2020 for smaller fund complexes. Funds must maintain in their records the information that is required to be included in Form N-PORT for reporting periods ending 30 June 2018 through 28 February 2019. Larger fund complexes (i.e., those with \$1 billion or more in net assets) with fiscal quarters ending 31 March 2019 are required to file their first report on Form N-PORT by 30 May 2019. Consistent with the delayed compliance date of 1 March 2019, those funds only file a report for the final month of the quarter (i.e., March 2019). Funds with fiscal quarters ending 30 April 2019 file reports on Form N-PORT for the final two months of the quarter (i.e., March and April 2019) by 1 July 2019, while funds with fiscal quarters ending 31 May 2019 file reports on Form N-PORT for all months in the quarter by 30 July 2019.

Effective date matrix – final PCAOB pronouncements and rules

Title	Effective date
Amendments to Auditing Standards for Auditor’s Use of the Work of Specialists	Effective for audits of fiscal years ending on or after 15 December 2020.
Auditing Accounting Estimates, Including Fair Value Measurements	Effective for audits of fiscal years ending on or after 15 December 2020.
The Auditor’s Report on an Audit of Financial Statements When the Auditor Expresses an Unqualified Opinion	Effective for audits of financial statements for annual reporting periods ending on or after 15 December 2017, except for the requirement to communicate critical audit matters (CAMs). Requirement to communicate CAMs will be effective for annual periods ending on or after 30 June 2019 for large accelerated filers and 15 December 2020 for all other filers.

Effective date matrix – final AICPA standards

Title	Effective date
SAS No. 139, Amendments to AU-C Sections 800, 805, and 810 to Incorporate Auditor Reporting Changes From SAS No. 134	<p>Amendments to AU-C 800: Effective for audits of financial statements prepared in accordance with a special purpose framework for periods ending on or after 15 December 2020.</p> <p>Amendments to AU-C 805: Effective for audits of single financial statements and specific elements, accounts, or items of a financial statement as of or for periods ending on or after 15 December 2020.</p> <p>Amendments to AU-C 810: Effective for engagements to report on summary financial statements for periods ending on or after 15 December 2020.</p> <p>Early implementation is not permitted.</p>
SAS No. 138, Amendments to the Description of the Concept of Materiality	Effective for audits of financial statements for periods ending on or after 15 December 2020.
SAS No. 137, The Auditor’s Responsibilities Relating to Other Information Included in Annual Reports	Effective for audits of financial statements for periods ending on or after 15 December 2020. Early implementation is not permitted.
SAS No. 136, Forming an Opinion and Reporting on Financial Statements of Employee Benefit Plans Subject to ERISA	Effective for audits of ERISA plan financial statements for periods ending on or after 15 December 2020. Early implementation is not permitted.
SAS No. 135, Omnibus Statement on Auditing Standards – 2019	Effective for audits of financial statements for periods ending on or after 15 December 2020.
SAS No. 134, Auditor Reporting and Amendments, Including Amendments Addressing Disclosures in the Audit of Financial Statements	Effective for audits of financial statements for periods ending on or after 15 December 2020. Early implementation is not permitted.
SAS No. 133, Auditor Involvement with Exempt Offering Documents	Effective for exempt offering documents with which the auditor is involved that are initially distributed, circulated or submitted on or after 15 June 2018.
SSAE No. 20, Amendments to the Description of the Concept of Materiality	Effective for practitioners’ examination or review reports dated on or after 15 December 2020.
SSAE No. 19, Agreed-Upon Procedures Engagements	Effective for practitioners’ AUP reports dated on or after 15 July 2021.
SSARS No. 25, Statement on Standards for Accounting and Review Services, Materiality in a Review of Financial Statements and Adverse Conclusions	Effective for engagements performed in accordance with SSARSs for periods ending on or after 15 December 2021.
SSARS No. 24, Omnibus Statement on Standards for Accounting and Review Services – 2018	Except for the revision to paragraph .39 of AR-C section 90, which is effective upon issuance, effective for compilations and reviews of financial statements for periods ending on or after 15 June 2019.

Effective date matrix – final GASB pronouncements

Title	Effective date
Statement No. 92, Omnibus 2020	Certain requirements were effective upon issuance, while others are effective for fiscal years or reporting periods beginning after 15 June 2020. Earlier application is encouraged and is permitted by topic.
Statement No. 91, Conduit Debt Obligations	Effective for reporting periods beginning after 15 December 2020. Earlier application is encouraged.
Statement No. 90, Majority Equity Interests, an amendment of GASB Statements No. 14 and No. 61	Effective for reporting periods beginning after 15 December 2018. Earlier application is encouraged.
Statement No. 89, Accounting for Interest Cost Incurred before the End of a Construction Period	Effective for reporting periods beginning after 15 December 2019. Earlier application is encouraged.
Statement No. 88, Certain Disclosures Related to Debt, Including Direct Borrowings and Direct Placements	Effective for reporting periods beginning after 15 June 2018. Earlier application is encouraged.
Statement No. 87, Leases	Effective for reporting periods beginning after 15 December 2019. Earlier application is encouraged.
Statement No. 84, Fiduciary Activities	Effective for reporting periods beginning after 15 December 2018. Earlier application is encouraged.
Statement No. 83, Certain Asset Retirement Obligations	Effective for reporting periods beginning after 15 June 2018. Earlier application is encouraged.

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