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**To:** Director - FASB <director@fasb.org>

**Subject:** File reference 2017-270 Topic 958

I have significant experience guiding clients regarding revenue recognition surrounding grant or contract treatment as well as conditional or unconditional treatment. The following are my responses to questions for respondents.

Question 1: The proposed amendments would provide further clarification and guidance.

Question 2: It provides limited clarification.

Question 3: Donor-imposed condition should include both items.

Question 4: The table does provide guidance. However the indicator "Purpose" should not apply. Most grant applications or grant award letters contain language around the purpose of the grant/award. Purpose related funding should be considered restricted and not conditional. Inclusion of this item would not further clarify and may result in confusion.

Question 5: Guidance should be applied equally

Question 6: Further definition of "measurable-related barriers" would be useful.

Question 7: Additional disclosure should be required describing the degree to which the organization's revenues are from conditional contributions, unconditional, and contractual. Grantors and other users of financial audits should have a full understanding of how the organization is funded including the degree to which its funding is from conditional or contractual engagements. This is indicative of the organization's fiscal health and ability to support general administrative costs.

Question 8: The proposed transition requirements are operable

Question 9: The proposed effective date should be the same. Early adoption should be permitted with disclosure.

Other comments: When the grantor requires that unspent funds be returned, it should be considered conditional. When the funder includes such a stipulation it implies that the funds must be spent for the intended purpose before the grantee has a right to retain the funds. Typically these are referred to as "reimbursement" grants. This should apply when the funding is considered a contribution. Also guidance related specifically to government contracts would be beneficial which are typically "reimbursement" form.

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