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Question Text	Response	Status
* Please select the type of entity or individual responding to this feedback form.	Industry Organization	Completed
Other, please specify (Specified)		
* Please provide contact information for any follow-up questions.	(Filled in as Follows:)	Completed
Organization *	Strength Matters CFO Working Group	
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Would the amendments in this proposed Update provide clarifying guidance that would be operable in practice? If not, why not?	Yes.	Completed
Would the proposed amendments clarify whether a resource provider is receiving commensurate value in return for assets transferred and when a transaction would be within the scope of Subtopic 958-605? If not, why not?	Yes, we believe that the proposed amendments generally clarify whether a resource provider is receiving commensurate value in return for assets transferred (exchange) and when a transaction is a contribution, but certain commonly seen transactions require further discussion. The proposed guidance indicates that transfers of assets (typically from a government entity) that are part of an existing exchange transaction between a recipient and an identified customer are not a contribution. Accordingly, how should organizations account for government rent subsidies such as Section 8 and other similar funding?	Completed
Should the definition of the term donor-imposed condition include a barrier that must be	Yes.	Completed

overcome before a recipient is entitled to the assets transferred or promised as well as a right of return for the assets transferred or a right of release of the promisor from its obligation to transfer assets? If not, why not?		
Should a barrier be described using a table of indicators that would allow judgment and that would specify that no single indicator would be determinative? What changes would you make, if any, to the proposed indicators?	We feel that "barrier" is a confusing term. A suitable replacement might be "goals". We would suggest that meeting "goals" mutually set by the resource provider and recipient as opposed to overcoming "barriers" might make the distinction clearer. The donor-imposed condition would then be overcome when the "goal" is achieved. The table of indicators is useful, but more guidance would be helpful. Example 15 describes a situation where a grant is accompanied by a budget that must be followed and approval must be obtained from the donor for significant deviations from the budget. Yet this grant is considered unconditional since the budget is not deemed to be a barrier given that incurring qualifying expenses is not a requirement of the grant. The facts and conclusions within this example are confusing: If the approval for a budget variance is required, why are the expenses contained within the budget deemed to be only a guideline? Additional guidance within the table of indicators would be helpful to shed more light on this determination. Additionally, Example 20 should clarify that the barrier must exceed what the NFP would have otherwise done. Otherwise, this grant would be considered to be donor-restricted for the purpose of funding 5,000 meals that the NFP would have provided with or without this grant.	Completed
Should the proposed amendments about distinguishing between conditional and unconditional contributions be applied the same to both a recipient and a resource provider?	Yes, the definitions should be consistently applied. Donors should not accrue a liability for conditional contributions and should disclose them as contingent liabilities. Existing accounting guidance matches timing of recording contributions by the recipient and resource provider, and we believe that approach should not change.	Completed
Should certain terms and/or their	A definition of donor-imposed restrictions would be helpful. In particular, more guidance is needed about how to apply	Completed

definitions (for example, contribution or donor-imposed restriction) be clarified? If yes, explain which term(s) and/or definition(s) you would clarify, why, and what would you recommend?	existing guidance about such restrictions that are similar to the organization's overall mission. For example, a NFP may be created to operate an affordable housing property to be financed by HUD. HUD donates funds for construction of the property under a capital grant program which requires repayment of the grant, with interest, if the NFP doesn't comply with HUD's requirements for 40 years. Some NFPs consider this to be an unrestricted donation, since the only mission of the NFP is to own and operate the HUD project under HUD's compliance requirements and other commonly-controlled NFPs have been successfully operated under those requirements for many years. Other NFPs consider this to be a temporarily restricted donation, to be released over the 40-year compliance period. This issue also arises when implementing the new NFP reporting standard, which eliminated the option to treat a donation for the acquisition of long-lived assets as temporarily restricted with restrictions released over the asset's useful life. Clarity regarding the ability of some NFPs to continue to release such restrictions over the 40-year compliance period would be helpful.	
Should current recurring disclosure requirements be amended for either a recipient or a resource provider? If yes, which disclosure requirements should be amended or added? Please explain why.	No.	Completed
Would the proposed transition requirements be operable and would they provide decision-useful information? If not, explain why and what you would recommend. Do you believe that modified prospective application would be more operable than prospective application? If not, explain why.	The modified prospective basis will result in recognizing contribution income when the amendment becomes effective, whereas the donor's agreement might have been created in a prior period. Many government grants are multi-year arrangements, so the modified prospective basis will result in recognizing several years' contributions at once. Retrospective application is preferable to prevent a potential material financial statement impact in the year the proposed guidance would be adopted.	Completed

Should the effective date of the proposed amendments be the same as the effective date of Topic 606? Do you agree that early adoption of the proposed amendments should be permitted?	Yes, the effective date of the proposed amendments should be the same as the effective date of Topic 606 and early adoption of the proposed amendments should be permitted	Completed
Please provide any additional comments on the proposed Update:	The Strength Matters CFO Working Group ("CFO Working Group") appreciates the opportunity to provide its views to the Financial Accounting Standards Board. The Strength Matters collaborative brings together three national networks of nonprofit owners and developers in the affordable housing field – Housing Partnership Network, NeighborWorks America, and Stewards of Affordable Housing for the Future. The CFO Working Group is comprised of chief financial officers of member organizations from each of the networks that work to develop best practices in financial reporting and financial management of nonprofit affordable housing developers. Additional information about Strength Matters and the CFO Working Group can be found at www.strengthmatters.net.	Completed
Please provide any comments on the electronic feedback process:		Completed
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