

Wong, Raymond J. EOP/OMB

From: Ben Bovee <ben_modeler@yahoo.com>
Sent: Wednesday, April 17, 2019 8:10 AM
To: MBX OMB CASB
Subject: [EXTERNAL] CASB 2019-01

Hello. Thank you for the public opportunity to comment.

I am in support of the U.S. Federal Government aiming for adoption of GAAP rules (GR). My related concerns include:

1. Modifications to rules being too volatile for employees to enact before they change;
2. No clear criteria for "when practicable,"
3. No apparent schedule--with milestones or timeline or both--for following GR;
4. No apparent assignment of accountability for following GR;
5. No apparent identification of Applicability (i.e., which Organizations and internal levels, and date of policy expiration pending review);
6. Neither apparent explicit audit conditions nor accountability consequences for an Agency not following GR;
7. Provide recommendation guidance for transitioning to the GRs; and
8. Recommend identifying a review frequency for these GRs (to allow organizations to adapt and adopt).

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