

From: [Joe Williams](#)
To: [Director - FASB](#)
Subject: FASB EITF-Developed Proposed Update Related to Affiliates
Date: Wednesday, September 05, 2012 11:09:31 AM
Attachments: [image001.png](#)

FASB,

This is in response to the EITF-Developed Proposed Update Related to Affiliates:

Question 1: Do you agree that the scope of this proposed Update should be limited to the standalone financial statements of not-for-profit entities that receive personnel services from an affiliate, that is, a party that, directly or indirectly through one or more intermediaries, controls, is controlled by, or is under common control with the recipient not-for-profit entity? If not, please explain why.

Yes, we agree.

Question 2: Do you agree that a recipient not-for-profit entity should recognize all personnel services received from an affiliate that directly benefit the recipient not-for-profit entity (that is, are similar to personnel directly engaged by the recipient not-for-profit entity) but for which the affiliate does not seek compensation for the services provided? If not, please explain why.

Yes, we agree

Question 3: Do you agree that a recipient not-for-profit entity should measure the personnel services received from an affiliate at the cost incurred by the affiliate? Furthermore, do you agree that, at a minimum, cost should include all direct personnel costs (for example, compensation and any payroll-related fringe benefits) incurred by the affiliate in providing the services to the recipient not-for-profit entity? If not, please explain why.

Yes, we agree with both of these statements

Question 6: Do you agree that, except for the related party disclosures in Subtopic 850-10, no other recurring disclosures should be required for a not-for-profit entity that receives personnel services from an affiliate? If not, please explain why.

Yes, we agree.

Question 7: Do you agree that a recipient not-for-profit entity should apply the proposed amendments prospectively? If not, please explain why.

Yes, we agree

Question 8: Do you agree that a recipient not-for-profit entity should be provided with an option to apply the proposed amendments under a modified retrospective approach in which all prior periods presented upon the date of adoption would be adjusted but no adjustment would be made to the beginning balance of net assets of the earliest period presented? If not, please explain why.

Yes, we agree

Question 9: Do you agree that a recipient not-for-profit entity should be permitted to early adopt the proposed amendments? If not, please explain why.

Yes, we agree

Question 10: How much time is needed to implement the proposed amendments? Please explain

For us, no time will be needed to implement. We are already operating accordingly.

Joseph Williams

Assistant Controller & Director of Accounting

(407) 826-2257

Joe.Williams@cru.org

www.cru.org

