



CLA (CliftonLarsonAllen LLP)
220 South Sixth Street, Suite 300
Minneapolis, MN 55402-1436
612-376-4500 | fax 612-376-4850
CLAconnect.com

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Technical Director
Financial Accounting Standards Board
401 Merritt 7
P.O. Box 5116
Norwalk, CT 06856-5116

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CliftonLarsonAllen LLP supports the Financial Accounting Standards Board's development of a philosophy to extend and simplify how effective dates are staggered between larger public entities and all other entities by issuing the August 21, 2019, Exposure Draft, Proposed Accounting Standards Update, *Financial Services—Insurance (Topic 944): Effective Date*.

We welcome this new philosophy and the relief it will provide to entities that can take advantage of the delayed implementation for the Update identified in the proposal and future Updates.

We have provided our response to the questions for respondents included in the exposure draft in the attachment. Thank for the opportunity to provide our feedback.

Sincerely,

CliftonLarsonAllen LLP

Exposure Draft: Proposed Accounting Standards Update—*Financial Services—Insurance (Topic 944): Effective Date*

CliftonLarsonAllen LLP is pleased to provide the following responses to the specific questions for respondents in the proposed Accounting Standards Update.

- 1. Effective date for larger public companies.** Should the amendments in Update 2018-12 be effective for fiscal years, and interim periods within those fiscal years, beginning after December 15, 2021, for larger public companies (that is, SEC filers other than entities eligible to be SRCs as defined by the SEC)? If not, please explain why not.

Yes, we agree with extending the effective date of the amendments in Update 2018-12 for larger public companies to fiscal years, and interim periods within those fiscal years, beginning after December 15, 2021.

- 2. Effective date for entities other than larger public companies.** Should the amendments in Update 2018-12 be effective two years after the effective date for larger public companies for entities other than larger public companies (that is, for entities other than larger public companies, effective for fiscal years beginning after December 15, 2023)? If not, please explain why not.

Yes, we agree with extending the effective date of the amendments in Update 2018-12 for entities other than larger public companies to fiscal years beginning after December 15, 2023.

- 3. Interim periods for entities other than larger public companies.** Should the amendments in Update 2018-12 be effective for interim periods within the years after those amendments are effective for annual periods for entities other than larger public companies (that is, effective for interim periods within fiscal years beginning after December 15, 2024)? Or, alternatively, should the amendments in Update 2018-12 be effective for interim periods within the same fiscal year that the amendments in that Update are effective for annual periods (that is, effective for interim periods within fiscal years beginning after December 15, 2023)? Please explain why.

Interim periods should not be included in the first year of implementation, instead interim period reporting should be applicable after the first fiscal year of adoption to allow for sufficient time to understand the impact and reporting for the Update.

- 4. Threshold.** Should the population of SEC filers that are afforded a delayed effective date be entities eligible to be SRCs as defined by the SEC? If not, what definitional threshold, if any, do you suggest and why.

Yes, we agree with affording SRCs a delayed effective date due to their limited resources relative to larger public companies.