

# FLORIDA GOVERNMENT FINANCE OFFICERS ASSOCIATION, INC.

Since 1937

P.O. Box 10270 • 301 South Bronough Street, Suite 300 • Tallahassee, Florida 32302-2270  
Telephone: (850) 222-9684 • Fax: (850) 222-3806 • Web Page: [www.fgfoa.org](http://www.fgfoa.org)



## President

**KEN BURKE, CPA**

Clerk of the Circuit Court and Comptroller  
Pinellas County – CCC  
(727) 464-3341  
[kburke@pinellascounty.org](mailto:kburke@pinellascounty.org)

## President - Elect

**JAMIE ROBERSON, CGFO**

Director of Finance  
City of Apopka  
(407) 703-1725  
[jroberson@apopka.net](mailto:jroberson@apopka.net)

## Secretary – Treasurer

**SHANNON RAMSEY-CHESSMAN, CPA, CGFO**

Chief Operating Officer  
Clerk & Comptroller – Palm Beach County  
(561) 355-4277  
[sramsey@mypalmbeachclerk.com](mailto:sramsey@mypalmbeachclerk.com)

## DIRECTORS

**MELISSA BURNS**

Director of Finance  
City of Atlantic Beach  
(904) 247-5807  
[mburns@coab.us](mailto:mburns@coab.us)

**ALTON “RIP” COLVIN, CPA, CGFO, CPM**

Executive Director  
Justice Administrative Commission  
(850) 488-2415  
[rip.colvin@justiceadmin.org](mailto:rip.colvin@justiceadmin.org)

**FRANK DIPAOLO, CPA, CGMA**

Finance Director  
City of Lighthouse Point  
(954) 784-3432  
[fdipaolo@lighthousepoint.com](mailto:fdipaolo@lighthousepoint.com)

**NICOLE GASPARRI, CGFO**

Organizational Program Manager  
City of Boca Raton  
(561) 789-8236  
[ngasparri@myboca.us](mailto:ngasparri@myboca.us)

**MIKE GOMEZ, CPA**

Audit Manager  
Florida Auditor General - Tallahassee  
(850) 412-2895  
[mikegomez@aud.state.fl.us](mailto:mikegomez@aud.state.fl.us)

**JONATHAN C. MCKINNEY, CGFO**

Finance Director  
City of New Smyrna Beach  
(386) 410-2651  
[jmckinney@cityofnfsb.com](mailto:jmckinney@cityofnfsb.com)

**WILLIAM SPINELLI, CPA**

Controller  
City of Orlando  
(407) 246-2165  
[william.spinelli@cityoforlando.net](mailto:william.spinelli@cityoforlando.net)

**KELLY STRICKLAND, CPA, CGFO**

Director of Financial Administration  
City of Sarasota  
(941) 954-4124  
[kelly.strickland@sarasotagov.com](mailto:kelly.strickland@sarasotagov.com)

**PAUL SHAMOUN**

Executive Director

July 19, 2019

David Bean, Director of Research and Technical Activities  
Governmental Accounting Standards Board  
401 Merritt 7  
Post Office Box 5116  
Norwalk, CT 06856-5116

Via email: [director@gasb.org](mailto:director@gasb.org)

RE: Project No. 38, SBITA

Dear Mr. Bean,

On behalf of the Florida Government Finance Officers Association (FGFOA), we are pleased to respond to the GASB Exposure Draft on Project No. 38 related to *Subscription-Based Information Technology Arrangements (SBITA)*. The comments below were prepared based on a review by the FGFOA members, its Technical Resources Committee, and the Board of Directors.

We concur with the guidance offered in the Exposure Draft, with one suggestion for clarification below.

## **Incentives Provided by a SBITA Vendor**

Paragraph 41 says that variable and contingent incentive payments received after the commencement of the subscription term should be reported as a reduction of subscription payments. We recommend clarifying the accounting treatment for a variable or contingent incentive payment, whether that is a revenue or a reduction in expense. In addition, the last sentence of paragraph 41, especially the word “accordingly”, is confusing.

We thank the GASB for its efforts in preparing the exposure draft and for the opportunity to respond. Please feel free to contact me at (727) 464-3341 or [kburke@mypinellasclerk.org](mailto:kburke@mypinellasclerk.org) regarding the comments above.

Sincerely,

Ken Burke, CPA  
President