

March 31, 2025

Mr. Jackson Day, Technical Director  
File Reference No. 2024-ED600  
FASB  
801 Main Avenue  
PO Box 5116  
Norwalk, CT 06856-5116

RE: Proposed Accounting Standards Update Interim Reporting (Topic 270)

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

Dear Mr. Day:

The North Carolina Association of Certified Public Accountants (NCACPA), representing more than 12,000 members in public practice, industry, government, and education, welcomes the opportunity to respond to the proposed update referenced above. This response represents the views of the NCACPA Accounting & Attestation Resource Group ("Resource Group") with input from the NCACPA staff.

We offer the following responses to the questions in the proposed update:

**Question 1: Do the amendments in this proposed Update that would clarify that the guidance in Topic 270 applies to interim financial statements and notes in accordance with GAAP (see paragraphs 270-10-15-3 through 15-4) increase the understandability of Topic 270? Please explain why or why not.**

Yes. The clarifying language reduces uncertainty about applicability of the guidance to various reporting scenarios, including the explicit inclusion of reporting for periods less than one year.

**Question 2: Are the proposed amendments that describe the form and content of interim financial statements and notes in accordance with GAAP (see paragraphs 270-10-45-20 through 45-24) appropriate? Do they capture the form and content of interim financial statements and notes currently being provided in accordance with GAAP? Please explain why or why not.**

Yes, these paragraphs are appropriate as they are consistent with the form and content used in prevailing practice in accordance with GAAP.

**Question 3: Do you agree that including a list of interim disclosure requirements in Section 270-10-50 would improve the Codification? Please explain why or why not.**

Yes. It is helpful for preparers to have one place to reference comprehensive expectations for interim disclosure requirements rather than having to monitor requirements and changes in many different places within the Codification.

**Question 4: Using the Board's methodology (see paragraphs BC42–BC55), is the proposed list of interim disclosure requirements in Section 270-10-50 complete, or are there disclosures that should be included in or excluded from the list? If so, please provide the disclosures and your rationale, including supporting evidence that is consistent with the Board's methodology.**

Yes, we agree that the proposed list of interim disclosure requirements in the referenced section is complete.

**Question 5: Do you agree with the Board's methodology on how it compiled the disclosure list in Topic 270 (see paragraphs BC42–BC55)? Please explain why or why not. If not, please describe your preferred methodology. Please identify the differences between the list of interim disclosures derived using your preferred methodology and the list of disclosures in Section 270-10-50 and provide supporting evidence that is consistent with your preferred methodology.**

We agree with the methodology. The methodology addresses stakeholder challenges and enhances clarity without expanding or changing the requirements that already exist in other sections of the Codification. The Board's process to research and evaluate various sources, including examining FASB basis for conclusion, internal FASB documentation, and accounting firms' interim disclosure checklists, is thorough and considers the applicability of disclosures from different perspectives.

**Question 6: The Board uses the term event-driven disclosures to describe disclosures required if an event or transaction occurs (see paragraph BC65). The Board decided that while certain event-driven disclosure requirements that meet the criteria in paragraph BC46 would be included in the interim disclosure list in the proposed amendments, others would be captured by the disclosure principle discussed in Question 7 (for example, if a new line of business was acquired with specific industry disclosure requirements, the acquirer would evaluate the disclosures under the disclosure principle rather than evaluating whether those industry requirements should be disclosed in accordance with the interim disclosure list in Topic 270). Do you agree with this approach to event-driven disclosures, or should other event-driven disclosures be included in the interim disclosure list? Please explain why or why not.**

We also agree with the Board's decision to exclude event-driven disclosures from inclusion within Topic 270. It would be impractical to include every possible event-driven disclosure that may be necessary, and focusing Topic 270 on disclosure requirements that are expected to be relevant on a recurring basis is a reasonable approach.

**Question 7: Is the proposed disclosure principle operable (see paragraphs 270-10-50-67 through 50-70)? Please explain why or why not. If not, did you consider the prior SEC disclosure principle included in paragraph 270-10-50-68 to be operable (see paragraphs BC56–BC59)? Would the proposed disclosure principle provide decision-useful information? Does the operability of the disclosure principle vary between SEC registrants and nonregistrants? Please explain why or why not. Are there any reasons why the wording in**

**paragraphs 270-10-50-67 through 50-70 should not be incorporated into GAAP? Please explain why or why not.**

Yes, the proposed disclosure principle is operable. It is reasonable for companies to evaluate whether a significant or material change has occurred since the end of the most recent annual period and to determine whether such an event requires disclosure. This principle aligns with the existing framework and provides a clear guideline for companies to follow, ensuring that relevant information is disclosed in a timely manner.

**Question 8: The Board decided to remove the phrase interim financial information from certain paragraphs that address the scope of the guidance within Topic 270 in the proposed amendments. Additionally, proposed consequential amendments were made to other Topics in certain paragraphs to remove the phrase interim financial information and other similar phrases. Would these proposed changes result in any unexpected consequences within other areas in GAAP? Please explain why or why not.**

No, the proposed changes would not be likely to result in unexpected consequences. The changes to the terminology do not substantially alter the interim reporting requirements included in Topic 270 and in the modified paragraphs within other Topics.

**Question 9: Do you agree with the proposed amendments in Sections B and C? If not, please explain which proposed amendment(s) you disagree with and why.**

Yes.

**Question 10: Do you agree that the proposed amendments should be applied prospectively to interim financial statements and notes in accordance with GAAP issued for reporting periods after the effective date? Please explain why or why not.**

Yes, if the amendments result in changes to a company's interim disclosures prospective application is appropriate, particularly when the interim report will include comparative period presentation and retrospective application could require changes to information disclosed about prior periods. It is also relevant to consider prospective application for companies and situations where compliance with the standard will require changes to a company's disclosure controls and procedures.

**Question 11: How much time is needed to implement the proposed amendments? Should early adoption be permitted? Please explain why or why not.**

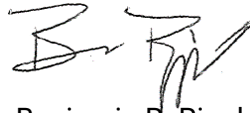
Time to implement will vary, but the time investment for most entities should be minimal. Early adoption should be permitted because adoption of the proposed amendments may allow or encourage an entity to provide more decision-useful information to stakeholders on a more timely basis.

Thank you for the opportunity to submit these comments. Please direct any questions or concerns to NCACPA Vice President of Advocacy and Outreach Robert Broome, CAE, at [rbroome@ncacpa.org](mailto:rbroome@ncacpa.org) or (919) 481-5160.

Sincerely,



Melisa F. Galasso, CPA  
Co-Chair  
Accounting & Attestation Resource Group



Benjamin R. Ripple, CPA  
Co-Chair  
Accounting & Attestation Resource Group

cc: NCACPA Board of Directors  
NCACPA A&A Resource Group  
Mark Sotichack, CPA, CGMA, NCACPA CEO