FASB FINANCIAL ACCOUNTING STANDARDS BOARD

Board Meeting Handout

Accounting for Commodities

May 27, 2026

Meeting Purpose

1. The Board will continue deliberating the project on accounting for commodities. At its February 4, 2026 meeting, the Board added this project to its technical agenda and began deliberations.

2. This handout is organized as follows:

   a. Background

   b. Issue A: Entities

   c. Issue B: Assets

   d. Issue C: Activities

   e. Issue D: Option versus Requirement

   f. Issue E: Disclosures

   g. Issue F: Transition and Early Adoption

   h. Issue G: Permission to Ballot.

Questions for the Board
Issue A: Entities 1. Should the proposed amendments apply only to tangible commodity inventories held by entities within the scope of Topic 942, Financial Services—Depository and Lending Institutions, including subsidiaries of those entities, for both the consolidated financial statements and the standalone financial statements of individual entities within the consolidated group? ***If the Board votes "yes" to Question 1, then proceed to the remaining questions. If the Board votes "no" to Question 1, then the staff would continue to perform further research and analysis for discussion at a future Board meeting.*** **Issue B: Assets** 2. Which asset scoping alternative does the Board prefer?

Questions for the Board

a. *Alternative A:* State that tangible commodities held in inventory by in-scope entities (based on Issue A above) are within the scope of the proposed Update without explicitly defining *commodity*

b. *Alternative B:* Specify that the scope is tangible commodities held in inventory by in-scope entities (based on Issue A above) and define the term *commodity* in the Master Glossary using a characteristics-based approach.

Issue C: Activities

3. Should the scope of the proposed amendments rely on activity-based scope criteria (Alternatives A through C) or not (Alternative D)? If so, should the scope incorporate any combination of Alternative A, B, or C?

   a. *Alternative A*: Specify that tangible commodities that are managed as part of an entity's trading activities are within the scope of the proposed Update

   b. *Alternative B*: Specify that tangible commodities that are managed on a fair value basis are within the scope of the proposed Update

   c. *Alternative C*: Specify that tangible commodities that will not undergo processing or conversion activities are within the scope of the proposed Update

   d. *Alternative D*: Do not rely on activity of the reporting entity as part of the proposed Update's scope.

Issue D: Option versus Requirement

4. Does the Board want to allow a fair value measurement option (rather than a requirement) similar to the guidance related to the measurement option in Topic 825, Financial Instruments, for tangible commodity inventories within the scope of the proposed amendments (that is, requiring that the election be made upon initial recognition and requiring the election to be irrevocable)?

5. If the Board allows a fair value measurement option (rather than a requirement), at what level does the Board want to allow a fair value measurement option to be elected?

   a. All tangible commodities

   b. A specific class of tangible commodities (for example, all precious metals)

   c. A specified type of tangible commodities (for example, all gold)

   d. An individual eligible item (for example, individual purchases or a portion of a specific purchase of gold).

Issue E: Disclosures

6. Should the following disclosures be required for tangible commodities that an entity has elected to measure using the fair value measurement option, along with applicable disclosures required by Topic 820, Fair Value Measurement?

   a. Management's reasons for electing a fair value option (FVO) for each eligible item or group of similar eligible items

   b. If the FVO is elected for some but not all eligible items within a group of similar eligible items, both of the following:

   c. A description of those similar items and the reasons for partial election

   d. Information to enable users to understand how the group of similar items relates to individual line items on the statement of financial position.

Questions for the Board
[Item b. is only relevant if the Board decides to allow election of the FVO at a level below all tangible commodities such that information regarding an eligible group of items is considered relevant.] e. For each period for which an income statement is presented, for each line item in the statement of financial position, the amounts of gains and losses from fair value changes included in earnings during the period and which line in the income statement those gains and losses are reported f. In annual periods only, the methods and significant assumptions used to estimate the fair value of items for which the FVO has been elected. **Issue F: Transition and Early Adoption** 7. Which transition alternative does the Board prefer? a. *Alternative A:* Prospective approach b. *Alternative B:* Cumulative-effect adjustment to retained earnings approach c. *Alternative C:* Full retrospective approach. 8. What transition disclosures does the Board want to require? 9. Does the Board want to permit early adoption of the proposed amendments in any interim period after the issuance of a final Update as of the beginning of the fiscal year that includes that interim period? **Issue G: Permission to Ballot** 10. Has the Board received sufficient information and analyses to make informed decisions on the issues presented? If not, what other information or analyses does the Board need? 11. Does the Board think that the expected benefits of the changes would justify the expected costs? If so, does the Board give the staff permission to draft a proposed Update for vote by written ballot? 12. What comment period does the Board want to provide for a proposed Update?

Issue A: Entities

3. On June 8, 2021, the North America Accounting Committee of the International Swaps and Derivatives Association (ISDA) submitted an agenda request (the 2021 ISDA Agenda Request) that asked that the Board consider expanding the scope of the FVO that is provided under Topic 825 to include commodity inventories and executory contracts related to commodities (for example, storage, transportation, and nonderivative purchase/sale contracts) that are managed on a fair value basis.

4. The 2021 ISDA Agenda Request highlights the accounting mismatch, the volatility that is reported in earnings that are not consistent with entities' actual economic position, and related challenges that arise from economically hedging commodities inventories. Specifically, the measurement of the commodities inventory at cost and the hedging instrument at fair value results in the change in fair value of the hedging instrument being recognized in current period income without recognizing the offsetting change in fair value of the economically hedged item (that is, the commodity). The 2021

ISDA Agenda Request states that this accounting mismatch results in less useful information because the financial statements do not accurately capture the economics of the hedge and that allowing commodity inventory to be measured at fair value would better reflect the expected economic outcome and future cash flows than the current accounting.

5. The 2021 ISDA Agenda Request also notes that while fair value hedging is available, it is often impractical because of the significant operational costs that exist when applying hedging guidance to inventories of commodities.

6. Respondents to the 2025 Invitation to Comment, *Agenda Consultation,* encouraged the Board not only to consider the FVO for physical commodities held for trading purposes by financial institutions but also to consider permitting it for all entities that hold physical commodities and executory contracts related to physical commodities and manage them on a fair value basis. The Board requested at its February 4, 2026 meeting that outreach with stakeholders from various industries be conducted. Therefore, outreach was conducted with stakeholders from the following industries:

   a. Oil and Gas

   b. Agriculture

   c. Banks

   d. Metals and Mining

   e. Energy.

Issue B: Assets

7. The staff has analyzed two alternatives related to establishing a scope of the proposed amendments based on assets held by a reporting entity. The alternatives include:

   a. *Alternative A:* State that tangible commodities held in inventory by in-scope entities (based on Issue A above) are within the scope of the proposed Update without explicitly defining *commodity*

   b. *Alternative B:* Specify that the scope is tangible commodities held in inventory by in-scope entities (based on Issue A above) and define the term *commodity* in the Master Glossary using a characteristics-based approach.

Issue C: Activities

8. The staff has analyzed four different alternatives related to establishing a scope of the proposed amendments based on activity of a reporting entity. Those alternatives are as follows:

    a. *Alternative A*: Specify that tangible commodities that are managed as part of an entity's trading activities are within the scope of the proposed Update

    b. *Alternative B*: Specify that tangible commodities that are managed on a fair value basis are within the scope of the proposed Update

    c. *Alternative C*: Specify that tangible commodities that will not undergo processing or conversion activities are within the scope of the proposed Update

    d. *Alternative D*: Do not rely on activity of the reporting entity as part of the proposed Update's scope.

Issue D: Option versus Requirement

9. Topic 825 provides current guidance on electing a FVO for financial instruments. If the Board were to allow a FVO for commodities, that model could be designed similarly to the guidance within Topic 825, including that the decision about whether to elect the FVO should be irrevocable and the FVO election should be made on the date that an entity first recognizes the tangible commodity.

10. The FVO could be applied at any of the following levels (at the discretion of the reporting entity):

    a. All tangible commodities

    b. A specific class of tangible commodities (for example, all precious metals)

    c. Specified type of tangible commodities (for example, all gold)

    d. An individual eligible item (for example, individual purchases or a portion of a specific purchase of gold).

Issue E: Disclosures

11. If an entity elects the FVO for certain commodities or is required to measure certain commodities at fair value, Topic 820 would require that the entity provide disclosures related to fair value measurements of those commodities.

12. Topic 825 includes requirements that could relate to commodities for which the FVO is elected. Those interim and annual requirements are as follows:

    a. Management's reasons for electing a FVO for each eligible item or group of similar eligible items

b. If the FVO is elected for some but not all eligible items within a group of similar eligible items, both of the following:

   1. A description of those similar items and the reasons for partial election

   2. Information to enable users to understand how the group of similar items relates to individual line items on the statement of financial position.

c. For each period that an income statement is presented, for each line item in the statement of financial position, the amounts of gains and losses from fair value changes included in earnings during the period and which line in the income statement those gains and losses are reported.

d. In annual periods only, an entity should disclose the methods and significant assumptions used to estimate the fair value of items for which the FVO has been elected.

13. Other potentially relevant disclosures that the Board may consider is the carrying amount of tangible commodities for which an entity has elected the FVO and, if the entity elects the FVO for a portion of a tangible commodity, the carrying amount of tangible commodities for which the FVO was not elected.

Issue F: Transition and Early Adoption

14. There are three different alternatives related to transition and early adoption. Those alternatives are as follows:

    a. *Alternative A:* Prospective approach

    b. *Alternative B:* Cumulative-effect adjustment to retained earnings approach

    c. *Alternative C:* Full retrospective approach.

15. Under Topic 250, Accounting Changes and Error Corrections, upon transition to a new accounting principle, an entity discloses the following:

    a. The nature of and reason for the change in accounting principle, including an explanation of why the newly adopted accounting principle is preferable

    b. The method of applying the change, including all of the following:

       1. A description of the prior-period information that has been retrospectively adjusted, if any.

       2. The effect of the change on income from continuing operations, net income (or other appropriate captions of changes in the applicable net assets or performance indicator), any other affected financial statement line item, and any affected per-share amounts for the current period and any prior periods retrospectively adjusted. Presentation of the effect on financial statement subtotals and totals other than income from continuing operations and net income

(or other appropriate captions of changes in the applicable net assets or performance indicator) is not required.

3. The cumulative effect of the change on retained earnings or other components of equity or net assets in the statement of financial position as of the beginning of the earliest period presented.

16. Another potentially relevant disclosure that the Board may consider is the amount of the cumulative effect of the change on retained earnings or other components of equity or net assets in the statement of financial position as of the beginning of the annual reporting period of adoption and a description of the financial statement line items affected by the adjustment.

Other Issues Specific to Transition

17. Other issues related to transition:

    a. Early adoption

    b. Adopting the amendments in a final Update after an interim period has been reported

    c. Option to use a full retrospective transition.

Issue G: Permission to Ballot

18. The Board will discuss whether the expected benefits justify the expected costs and the proposed comment period of the proposed Update.

FINANCIAL ACCOUNTING STANDARDS BOARD

Board Meeting Handout

Mortgage Servicing Rights—Recapture

May 27, 2026

Meeting Purpose

1. The Board will consider whether to add a project to its technical agenda to address whether the value attributable to recapture should be included when measuring a mortgage servicing right (MSR). The Emerging Issues Task Force (EITF) discussed this issue and developed recommendations.

Questions for the Board

Agenda Decision

1. Does the Board want to add a project to its technical agenda to address whether the value attributable to recapture should be included in the measurement of an MSR?

EITF Recommended Solution

2. Does the Board agree with the following EITF decisions?
    a. **Unit of Account**—An MSR and recapture are a single unit of account, and, therefore, the measurement of an MSR should include the effects of recapture.
    b. **Whether to Define Recapture**—Recapture should not be defined.
    c. **Issue Scope**—The recommended solution should apply to residential MSRs only.
    d. **Amortization**—The current amortization guidance for MSRs should not be amended.
    e. **Disclosures**—Additional disclosures should not be required.
    f. **Entity Applicability**—The recommended solution should apply to all entities.
    g. **Optional or Required Application**—The recommended solution should be required (rather than optional).

Transition and Early Adoption

3. Does the Board want to require a modified prospective transition approach under which an entity would apply the amendments to all MSRs outstanding as of the beginning of the period of adoption, with a cumulative effect adjustment to the opening balance of retained earnings (or other components of equity or net assets in the statement of financial position) as of the adoption date?
4. Does the Board want to permit early adoption?

Questions for the Board
5. Does the Board want to require the following transition disclosures? a. The nature of and reason for the change in accounting principle b. The method of applying the change c. The cumulative effect of the change on retained earnings (or other components of equity or net assets in the statement of financial position) as of the adoption date.
Benefits and Costs, and Permission to Ballot
6. Has the Board received sufficient information and analyses to make informed decisions on the issues presented? If not, what other information or analyses does the Board need? 7. Does the Board think that the expected benefits of the changes would justify the expected costs? If so, does the Board give the staff permission to draft a proposed Accounting Standards Update for vote by written ballot?
Comment Period
8. What comment period does the Board want to provide for the amendments in a proposed Update?

Issue Background

2. As noted in the EITF Issue Summary—Mortgage Servicing Rights—Recapture, the EITF received an agenda request in August 2025 to consider adding a project to its agenda relating to whether recapture should be included when measuring an MSR under Subtopic 860-50, Transfers and Servicing—Servicing Assets and Liabilities.

3. As indicated in the agenda request, recapture refers to a servicer's ability to solicit borrowers of an underlying mortgage loan for refinancing and recover its economics through the servicing of a new loan. The market typically ascribes value to recapture and the servicer's refinancing-related insight, and, as a result, recapture is often included in the transaction prices that entities pay (or demand) when buying (or selling) MSRs.

4. The agenda request highlights that Subtopic 860-50 does not clearly address whether the value attributable to recapture should be included when measuring an MSR, resulting in diversity in practice.

Current Guidance

5. Subtopic 860-50 provides guidance on the accounting treatment for servicing assets and servicing liabilities.[1] Under that Subtopic, an entity recognizes a servicing asset when it (a) acquires a servicing

[1] A servicing right recognized under generally accepted accounting principles (GAAP) may be a servicing liability if the costs to service the underlying financial asset exceed the benefits of servicing. For ease of reference, this handout refers to servicing assets only.

right without the related financial asset or (b) retains the right to service a transferred financial asset in a transfer that qualifies for sale accounting under Topic 860, Transfers and Servicing.

6. An entity initially measures a servicing asset at fair value, regardless of whether explicit consideration is paid. A servicing asset is subsequently measured using either the fair value method or the amortization method as follows:

   a. **Fair value method.** Under this method, a servicing asset is remeasured at fair value at each reporting date, with changes in fair value recognized in earnings.

   b. **Amortization method.** Under this method, a servicing asset is amortized in proportion to, and over the period of, estimated net servicing income, and assessed for impairment on the basis of the fair value at each reporting date.

EITF Recommendations

7. At its March 12, 2026, meeting, the EITF discussed this issue and made the following recommendations:

   a. That the Board add a project to its technical agenda to clarify how an entity should consider recapture when accounting for MSRs.

   b. That under the recommend solution for this issue:

      1. An MSR and recapture are a single unit of account, and, therefore, the measurement of an MSR should include the effects of recapture.

      2. Recapture should not be defined.

      3. The recommended solution should apply to residential MSRs only.

      4. The current amortization guidance for MSRs should not be amended.

      5. Additional disclosures should not be required.

   c. That the recommended solution should apply to all entities and that any potential amendments should be required (rather than optional).

FASB FINANCIAL ACCOUNTING STANDARDS BOARD

Board Meeting Handout

Subjective Acceleration Clauses and Related Disclosures

May 27, 2026

Meeting Purpose

1. The Board will decide whether to add a project to its technical agenda related to subjective acceleration clauses and related disclosures and begin initial deliberations.

Questions for the Board
Agenda Criteria
1. Does the Board want to add a project to its technical agenda on subjective acceleration clauses in determining the classification of debt as a current or noncurrent liability in a classified balance sheet?
If the Board decides not to add a project, the remaining questions are not applicable.
Issue A: Probability Assessment
2. Does the Board want to remove the probability assessment guidance (paragraph 470-10-45-2) and instead require that a subjective acceleration clause affect debt classification only when it is triggered?
3. If the answer is yes to Question 2, how does the Board want to describe *triggered*?
a. Alternative A1: When a borrower is notified by a lender of noncompliance, including notification that occurs when the lender demands payment.
b. Alternative A2: When a lender demands repayment of the underlying long-term debt in accordance with a subjective acceleration clause.
4. If the answer is yes to Question 2, does the Board want to address grace periods? If yes, how does the Board want to address them?
5. If the answer is yes to Question 2, does the Board agree with the staff's recommendation that once a subjective acceleration clause is triggered, the related debt should be classified as a current liability?

The staff prepares Board meeting handouts to facilitate the audience's understanding of the issues to be addressed at the Board meeting. This material is presented for discussion purposes only; it is not intended to reflect the views of the FASB or its staff. Official positions of the FASB are determined only after extensive due process and deliberations.

Questions for the Board
Issue B: Application of the Subsequent Events Guidance
6. Does the Board want to add an example to the implementation guidance to illustrate the application of the subsequent events guidance?
Issue C: Intent and Ability to Refinance on a Long-Term Basis
7. Does the Board agree with the staff recommendations on the guidance on the intent and ability to refinance on a long-term basis?
Issue D: Revolving Credit Agreements
8. Does the Board agree with the staff recommendations on the guidance on revolving credit agreements with subjective acceleration clauses?
Issue E: Disclosures
9. Does the Board agree with the staff recommended disclosure requirements?
Issue F: Entity Applicability
10. Does the Board want the proposed amendments to apply to all entities?
Issue G: Transition and Early Adoption
11. Does the Board want to require a prospective transition method?
12. What transition disclosures does the Board want to require?
13. Does the Board want to permit early adoption of the proposed guidance for all entities?
Benefits and Costs, Permission to Ballot, and Comment Period
14. Has the Board received sufficient information and analysis to make an informed decision on the expected costs of the change? If not, what other information or analysis is needed?
15. Does the Board believe that the expected benefits would justify the expected costs of the amendments included in a proposed Accounting Standards Update? If not, why?
16. Does the Board authorize the staff to proceed to draft a proposed Update for vote by written ballot?
17. What comment period does the Board select for the amendments in the proposed Update?

Background

2. At the March 2025 PCC meeting, in connection with its agenda priorities reassessment, PCC members requested that the FASB staff research the guidance in Topic 470, Debt, on subjective acceleration clauses in determining the classification of debt as a current or noncurrent liability in a classified balance sheet.

3. Since the March 2025 meeting,[1] the FASB staff has been conducting research and outreach on the guidance on subjective acceleration clauses. The PCC has supported moving forward with this research project on the basis that:

   a. Subjective acceleration clauses are pervasive in debt agreements.
   b. Certain guidance on subjective acceleration clauses is complex to apply and is sometimes overlooked.
   c. Diversity in practice exists in applying the guidance on subjective acceleration clauses.
   d. There is a need to better align the accounting for those clauses with the reality that subjective acceleration clauses are rarely enforced by lenders.
   e. Financial statement users support potential changes to the guidance.

4. At the March 2026 meeting, the PCC recommended that the FASB add a project to its technical agenda rather than the PCC leading the project because outreach indicated that subjective acceleration clauses are prevalent in the debt arrangements of *all* entities, and, therefore, the issue is not unique to private companies. PCC members also made recommendations to the FASB on the issues covered in this handout.

Issue A: Probability Assessment

5. Paragraph 470-10-45-2 requires that an entity consider the likelihood of acceleration of the due date of long-term debt when determining noncurrent or current classification when a subjective acceleration clause exists in a debt arrangement (referred to as the probability assessment). The outcome of that assessment determines whether reclassification and/or disclosures are required. Neither reclassification nor disclosure is required if the likelihood of acceleration of the due date is remote.

6. At the March 2026 PCC meeting, the PCC made the following recommendations to the Board:

   a. Remove the probability-based assessment guidance and instead require that subjective acceleration clauses affect the classification of debt only when triggered.
   b. Describe a *trigger* as an event in which a lender demands repayment of the underlying debt because of noncompliance with a subjective acceleration clause.
   c. Require that long-term debt subject to a subjective acceleration clause be classified as a current liability when the subjective acceleration clause is triggered.

7. On the basis of research and outreach, the staff has provided the following alternatives to describe a trigger:

[1] Previous PCC meeting memos on subjective acceleration clauses can be found here: June 2025, September 2025, December 2025, and March 2026.

a. Alternative A1: When a borrower is notified by a lender of noncompliance, including notification that occurs when the lender demands payment.
b. Alternative A2: When a lender demands repayment of the underlying long-term debt in accordance with a subjective acceleration clause.

8. At the March 2026 PCC meeting, the PCC suggested that the Board consider providing clarity around grace periods in the context of a *trigger* but did not provide any recommendations on how the Board should consider addressing them.

Issue B: Application of the Subsequent Event Guidance

9. At the March 2026 PCC meeting, PCC members voted unanimously to recommend that the Board include an illustrative example on the application of the guidance in Topic 855, Subsequent Events. This example would illustrate that an entity would apply the subsequent events guidance upon the trigger of a subjective acceleration clause.

Issue C: Intent and Ability to Refinance on a Long-Term Basis

10. Paragraph 470-10-45-14 provides debt classification guidance when an entity demonstrates its intent and ability to refinance short-term debt on a long-term basis after the balance sheet date but before the financial statements are issued (or are available to be issued). That guidance states that a short-term obligation is excluded from current liabilities if the entity intends to refinance the obligation on a long-term basis and the intent to refinance the short-term obligation on a long-term basis is supported by an ability to consummate the refinancing demonstrated in either of the following ways:
    a. Post-balance-sheet date issuance of a long-term obligation or equity securities (paragraph 470-10-45-14(a))
    b. Financing agreement that meets certain conditions (paragraph 470-10-45-14(b)).

11. One of the conditions in paragraph 470-10-45-14(b) involves subjective acceleration clauses, and states, in part, that financing agreements cancelable for violation of a provision that can be evaluated differently by the parties to the agreement (such as a material adverse change or failure to maintain satisfactory operation) do not comply with this condition. In other words, the guidance precludes noncurrent classification of short-term debt that is intended to be refinanced on a long-term basis by entering into a financing agreement after the balance sheet date but before the financial statements are issued (or are available to be issued) in scenarios in which the financing agreement includes a subjective acceleration clause. That short-term debt must continue to be classified as a current liability.

12. At the March 2026 PCC meeting, the PCC voted unanimously to recommend that the Board amend the condition in paragraph 470-10-45-14(b)(1) so that it is trigger based. That is, the mere existence of a subjective acceleration clause in a financing agreement intended to refinance short-term debt on

a long-term basis would no longer preclude the debt from being classified as a current liability; however, the other conditions in paragraph 470-10-45-14(b) would still need to be met.

Issue D: Revolving Debt Agreements

13. Paragraphs 470-10-45-4 through 45-6 provide debt classification guidance on revolving credit agreements with features such as lock-box arrangements and subjective acceleration clauses. Those paragraphs intersect with the probability assessment guidance in paragraph 470-10-45-2 and the intent and ability to refinance guidance in paragraph 470-10-45-14.

14. At the March 2026 PCC meeting, the PCC voted unanimously to recommend that the Board make conforming changes to the guidance on revolving credit agreements with subjective acceleration clauses to be trigger based.

Issue E: Disclosures

15. During previous PCC meetings, members indicated that disclosures related to triggers of subjective acceleration clauses should be included in this project.

16. At the March 2026 PCC meeting, consistent with the staff recommendation, the PCC voted unanimously to recommend that the Board require disclosures in the period in which a subjective acceleration clause has been triggered, including:

    a. A description of the event that led to the trigger of a subjective acceleration clause

    b. An explanation of the trigger (that is, a description of the lender's notification to the borrower including repayment terms)

    c. The amount of obligations subject to the trigger

    d. If applicable, the terms of the waiver, including the period of the waiver.

Issue F: Entity Applicability

17. The issues being contemplated were initially identified by the PCC for private companies, however, stakeholder feedback received during the PCC's research project indicated that the issues are not unique to private companies. For example, stakeholders indicated that subjective acceleration clauses are included in most debt arrangements, irrespective of the type of entity, and that the issues in applying the guidance are relevant to all entities that prepare classified balance sheets.

Issue G: Transition and Early Adoption

Transition Method

18. At the March 2026 PCC meeting, the PCC voted to recommend that the Board require a prospective transition method. Six PCC members also supported permitting retrospective application, pending additional research by the FASB staff on whether that method could be beneficial.

Transition Disclosures

19. The Board will discuss which transition disclosures within Topic 250, Accounting Changes and Error Corrections, to require.

Early Adoption

20. The Board will discuss whether to permit early adoption of the proposed amendments.

Analysis of Agenda Criteria

21. The Board will evaluate a potential project related to subjective acceleration clauses and related disclosures based on the following agenda decision criteria:
    a. Is there an identifiable and sufficiently pervasive need to improve GAAP?
    b. Are there technically feasible solutions, and are the expected benefits of those solutions likely to justify the expected costs of change?
    c. Does the issue have an identifiable scope?

Analysis of Benefits and Costs

22. The Board will discuss whether the expected benefits of the proposed amendments would justify the expected costs.

Comment Period of a Proposed Update

23. The Board will discuss the comment period for a proposed Update.