



Accounting Roundup

Year in Review — 2011





To our clients, colleagues, and other friends:

Welcome to the 2011 edition of *Accounting Roundup: Year in Review*. In 2011, the FASB and IASB continued their efforts to converge U.S. GAAP and IFRSs, making progress on their joint projects on (1) financial instruments, (2) revenue recognition, (3) leasing, and (4) insurance contracts.

Two other topics also dominated the accounting news: (1) IFRSs in the United States and (2) private-company accounting. In response to the feedback received from the FAF, AICPA, and others on its proposed framework to incorporate IFRSs into the U.S. financial reporting system, the SEC released two additional staff papers. In addition, the AICPA grabbed headlines this year when it (1) recommended optional adoption of IFRSs by U.S. public companies in a comment letter to the SEC and (2) disagreed with the FAF's proposal to create a council under the oversight of the FASB that would work toward improving private-company standard setting.

The AICPA held its annual National Conference on Current SEC and PCAOB Developments earlier this month. During the conference, the SEC, PCAOB, FASB, IASB, and others provided financial professionals with updates on new developments, regulations, and current priorities. For more information about the conference, see Deloitte's December 14, 2011, [Heads Up](#).

Accounting Roundup: Year in Review summarizes final guidance that affects reporting and disclosures for this reporting season. With the exception of guidance issued in December, proposed guidance, such as exposure drafts and invitations to comment, is not included. Please see our 2011 monthly and quarterly issues of *Accounting Roundup* for more information about these documents.

In addition, note that in this year-end edition, an asterisk in the article title denotes events that occurred in December or that were not addressed in previous 2011 issues of *Accounting Roundup*, including updates to previously reported topics. Events without asterisks were covered in those previous issues.

As usual, click any title in the table of contents to go directly to the article. For additional information about a topic, click the hyperlinks, which are blue. Further details are also on the Web sites of the accounting standard setters and regulators, including the [FASB](#), [GASB](#), [SEC](#), [PCAOB](#), [AICPA](#), and [IASB](#).

So what will be the focus for 2012? We are expecting the boards to issue final standards on revenue recognition, lease accounting, and portions of the financial instruments project. In addition, the boards are planning to issue their long-awaited second round of staff drafts or exposure drafts on insurance contracts. We encourage you to keep up to date on the actions of the regulators and standard setters during 2012 through our *Accounting Roundup* series, *EITF Snapshot* series, *Heads Up* articles, and *Dbriefs* webcasts.

We hope that *Accounting Roundup: Year in Review* will be helpful to you this financial reporting season. As always, we welcome your feedback. Please send questions and comments to accountingstandards@deloitte.com.

Happy New Year,

Deloitte & Touche LLP



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Business Combinations

FASB Issues ASU on Disclosures About Supplementary Pro Forma Information for Business Combinations

Affects: Public entities (as defined in ASC 805) that enter into business combinations that are material individually or in the aggregate.

Summary: On December 21, 2010, the FASB issued [ASU 2010-29](#) to address differences in the ways entities have interpreted ASC 805's requirements for disclosures about pro forma revenue and earnings in a business combination. The ASU states that "if a public entity presents comparative financial statements, the entity should disclose revenue and earnings of the combined entity as though the business combination(s) that occurred during the current year had occurred as of the beginning of the comparable prior annual reporting period only." In addition, the ASU "expand[s] the supplemental pro forma disclosures under [ASC 805] to include a description of the nature and amount of material, nonrecurring pro forma adjustments directly attributable to the business combination included in the reported pro forma revenue and earnings."

Next Steps: The ASU is effective prospectively for business combinations whose acquisition date is at or after the beginning of the first annual reporting period beginning on or after December 15, 2010.

Other Resources: Deloitte's November 2010 [EITF Snapshot](#). ●

Comprehensive Income

FASB Issues ASU 2011-12 to Defer Portions of ASU 2011-05*

Affects: Entities that report items of other comprehensive income.

Summary: On December 23, 2011, the FASB issued [ASU 2011-12](#), which defers certain provisions of [ASU 2011-05](#). One of ASU 2011-05's provisions required entities to present reclassification adjustments out of accumulated other comprehensive income by component in both the statement in which net income is presented and the statement in which other comprehensive income is presented (for both interim and annual financial statements). Accordingly, this requirement is indefinitely deferred by ASU 2011-12 and will be further deliberated by the FASB at a future date. The new ASU is in response to constituents' concerns about whether the requirements under ASU 2011-05 for the presentation of reclassification adjustments were operational.

The FASB also decided that during the deferral period, entities would be required to comply with all existing requirements for reclassification adjustments in ASC 220, which indicates that "[a]n entity may display reclassification adjustments on the face of the financial statement in which comprehensive income is reported, or it may disclose reclassification adjustments in the notes to the financial statements."

The effective date of ASU 2011-12 is the same as that for the unaffected provisions of ASU 2011-05 (i.e., those related to the requirement to report the components of comprehensive income in either (1) a continuous statement of comprehensive income or (2) two separate but consecutive statements). Accordingly, for public entities, the effective date is for fiscal years, and interim periods within those fiscal years, beginning after December 15, 2011. Nonpublic entities are required to apply the provisions for annual periods ending after December 15, 2012, and interim and annual periods thereafter.

Other Resources: Deloitte's December 23, 2011, [Heads Up](#) and the FASB's December 23, 2011, [FASB in Focus](#) article on the ASU. ●

FASB Finalizes Guidance on Presentation of Comprehensive Income

Affects: All entities.

Summary: On June 16, 2011, the FASB issued [ASU 2011-05](#), which revises the manner in which entities present comprehensive income in their financial statements. The new guidance removes the presentation options in ASC 220 and requires entities to report components of comprehensive income in either (1) a continuous statement of comprehensive income or (2) two separate but consecutive statements.

The ASU does not change the items that must be reported in other comprehensive income.

Next Steps: With the exception of the indefinite deferral of the provisions that require entities to present, in both net income and OCI, adjustments of items that are reclassified from OCI to net income, for public entities, the amendments are effective for fiscal years, and interim periods within those years, beginning after December 15, 2011. For nonpublic entities, the amendments are effective for fiscal years ending after December 15, 2012, and interim and annual periods thereafter. Early adoption is permitted. The amendments do not require incremental disclosures in addition to those required by ASC 250 or any transition guidance.

Other Resources: Deloitte's June 17, 2011, [Heads Up](#). ●

Consolidation

FASB Proposes Guidance on Cumulative Translation Adjustments*

Affects: All entities.

Summary: On December 8, 2011, the FASB issued a [proposed ASU](#) (based on the Board's ratification of the EITF's consensus on Issue 11-A) that would amend the Board's guidance regarding a parent's accounting for a cumulative translation adjustment upon the sale or transfer of a group of assets that is a nonprofit activity or a business within a consolidated foreign entity. Under the proposed ASU, "[w]hen a reporting entity ceases to have a controlling financial interest in a group of assets that is a nonprofit activity or a business (other than a sale of in substance real estate or conveyance of oil and gas mineral rights) within a consolidated foreign entity," the reporting entity would be required to apply ASC 810-10 "to release any related cumulative translation adjustment into earnings." Further, a parent that "has hedged part (or all) of its net investment in the foreign entity in which the group of assets had resided" would be required to "release into earnings the related amount of accumulated gain or loss on the net investment hedge attributable to the nonprofit activity or business."

Next Steps: The proposed ASU would be applied prospectively to derecognition events occurring after the effective date; early adoption would be permitted. Prior periods would not be adjusted.

Comments on the proposed ASU are due by February 6, 2012.

Other Resources: Deloitte's November 2011 [EITF Snapshot](#). ●

FASB Extends Comment Letter Deadline for Three Proposed ASUs*

Affects: All entities.

Summary: On December 8, 2011, the FASB decided to extend the comment letter deadlines (to February 15, 2012) for its proposed ASUs on [consolidation](#) (principal versus agent analysis), [investment companies](#), and [investment property entities](#).

The decision was based on comment letters received from 16 constituents that indicated they needed more time to analyze the effects of the EDs and to understand their interrelationship.

Next Steps: The original comment deadlines were January 5, 2012, for the investment company and investment property proposals and January 17, 2012, for the consolidation proposal. The IASB has not discussed whether it will also extend its January 5, 2012, deadline for comments on its investment entity ED.

Other Resources: The FASB's December 8, 2011, [Action Alert](#). ●

IASB Publishes Final Standards on Consolidation, Joint Ventures, and Disclosures About Interests in Other Entities

Affects: Entities reporting under IFRSs.

Summary: On May 12, 2011, the IASB published the following new and amended guidance (the "package of five") on the accounting for consolidations, joint arrangements, and disclosures about interests in other entities:

- IFRS 10, which replaces IAS 27 and SIC-12.
- IFRS 11.
- IFRS 12.

- IAS 27 (Revised 2011), which has been amended for the issuance of IFRS 10 but retains the current guidance on separate financial statements.
- IAS 28 (Revised 2011), which has been amended for conforming changes on the basis of the issuance of IFRS 10 and IFRS 11.

Next Steps: Each standard is effective for annual periods beginning on or after January 1, 2013; earlier application is permitted as long as each of the other standards in the "package of five" is also early applied.

Other Resources: Deloitte's May 27, 2011, [Heads Up](#). ●

Fair Value Measurement

FASB and IASB Issue Substantially Converged Requirements for Fair Value Measurement and Disclosure

Affects: All entities.

Summary: On May 12, 2011, the FASB issued [ASU 2011-04](#). The ASU is the result of joint efforts by the FASB and IASB to develop a single, converged fair value framework — that is, converged guidance on how (not when) to measure fair value and on what disclosures to provide about fair value measurements. Thus, there are few differences between the ASU and its international counterpart, IFRS 13. While the ASU is largely consistent with existing fair value measurement principles in U.S. GAAP, it expands ASC 820's existing disclosure requirements for fair value measurements and makes other amendments. Many of these amendments were made to eliminate unnecessary wording differences between U.S. GAAP and IFRSs. However, some could change how the fair value measurement guidance in ASC 820 is applied.

Next Steps: The ASU is effective prospectively for interim and annual periods beginning after December 15, 2011, for public entities and for annual periods beginning after December 15, 2011, for nonpublic entities. Early adoption is not permitted for public entities. Early adoption is permitted for nonpublic entities, but no earlier than for interim periods beginning after December 15, 2011.

Other Resources: Deloitte's May 13, 2011, [Heads Up](#). ●

Financial Instruments

IASB Defers Mandatory Effective Date of IFRS 9 to 2015*

Affects: All entities.

Summary: On December 16, 2011, the IASB issued amendments to IFRS 9 that defer the mandatory effective date of IFRS 9 from January 1, 2013, to January 1, 2015. The purpose of the deferral is to make the mandatory effective date the same for all phases of the IASB's financial instruments project. Early application of IFRS 9 is still permitted.

Other Resources: For more information, see the [press release](#) on the IASB's Web site. ●

FASB and IASB Issue New Balance Sheet Offsetting Disclosure Requirements*

Affects: All entities.

Summary: On December 16, 2011, the FASB issued [ASU 2011-11](#), which contains new disclosure requirements regarding the nature of an entity's rights of setoff and related arrangements associated with its financial instruments and derivative instruments. The new disclosures are designed to make financial statements that are prepared under U.S. GAAP more comparable to those prepared under IFRSs. Generally, it is more difficult to qualify for offsetting under IFRSs than it is under U.S. GAAP because under U.S. GAAP certain derivative and repurchase agreement arrangements are granted exceptions from the general offsetting model. As a result, entities with significant financial instrument and derivative portfolios that report under IFRSs typically present positions on their balance sheets that are significantly larger than those of entities with similarly sized portfolios whose financial statements are prepared in accordance with U.S. GAAP. To facilitate comparison between financial statements prepared under U.S. GAAP and IFRSs, the new disclosures will give financial statement users information about both gross and net exposures.

Next Steps: The new disclosure requirements are effective for annual reporting periods beginning on or after January 1, 2013, and interim periods therein; retrospective application is required.

Other Resources: Deloitte's December 20, 2011, [Heads Up](#). ●

Goodwill and Intangible Assets

FASB Amends Guidance on Testing Goodwill for Impairment

Affects: All entities.

Summary: On September 15, 2011, the FASB issued [ASU 2011-08](#), which gives entities testing goodwill for impairment the option of performing a qualitative assessment before calculating the fair value of a reporting unit in step 1 of the goodwill impairment test. If entities determine, on the basis of qualitative factors, that the fair value of a reporting unit is more likely than not less than the carrying amount, the two-step impairment test would be required. Otherwise, further testing would not be needed.

Next Steps: The ASU is effective for all entities for annual and interim goodwill impairment tests performed for fiscal years beginning after December 15, 2011. Early adoption is permitted.

Other Resources: Deloitte's September 16, 2011, [Heads Up](#) and the FASB's August 10, 2011, [meeting minutes](#). ●

Investments

Financial Reporting Considerations Related to S&P's Credit Rating Downgrade for Long-Term U.S. Sovereign Debt

Affects: All entities.

Summary: On August 5, 2011, S&P announced the unprecedented move of reducing its long-term assessment of U.S. sovereign debt to AA+, with a negative outlook. However, the news was not entirely negative since S&P affirmed the U.S. Treasury's short-term credit rating of A-1+, indicating that the short-term capacity of the United States to meet its financial commitment on its outstanding obligations is strong.

There are several financial reporting considerations related to the S&P downgrade of long-term U.S. sovereign debt. Most notably, U.S. Treasury rates are still considered "risk-free"; the downgrade would not cause, in and of itself, other-than-temporary impairments of U.S. sovereign debt; and U.S. Treasury rates continue to be a hedgeable benchmark interest rate. While recent volatility in the financial markets could trigger additional impairment analysis of an entity's investments, the financial reporting effects of the S&P's downgrade are primarily disclosure-related.

Other Resources: Deloitte's August 16, 2011, [Financial Reporting Alert](#). ●

Accounting Considerations Related to Holdings of Greek and Other Eurozone Sovereign Debt

Affects: Entities (reporting under either U.S. GAAP or IFRSs) holding Greek and other Eurozone sovereign debt.

Summary: In the second quarter of 2011, Greece's difficulty in meeting its debt obligations became increasingly apparent. Evidence and consequences of such difficulty included (1) Greece's failure in May to meet fiscal targets under the 2010 EU/IMF rescue plan, (2) the subsequent severe downgrading of its credit by rating agencies, and (3) the need for a restructuring or additional rescue package (or both) for it to meet its obligations beyond the immediate term to avoid default.

The impairment considerations and resulting accounting treatment apply to holdings of debt (or other loans) issued by the sovereign states subject to a current rescue plan (i.e., Greece, Portugal, and Ireland); however, it may also be relevant to holdings of debt (or other loans) of other sovereign states in which doubts have been raised about the credit quality of such holdings as a result of recent market sentiment. While this issue may pertain more to entities applying IFRSs, it can also affect those applying U.S. GAAP.

Other Resources: Deloitte's July 29, 2011, [Financial Reporting Alert](#). ●

Other Expenses

FASB Issues ASU on Fees Paid to the Federal Government by Health Insurers

Affects: Entities that provide health insurance and that are required to pay the U.S. government a fee calculated on the basis of net premiums and third-party administrative agreement fees.

Summary: On July 20, 2011, the FASB issued [ASU 2011-06](#), which provides guidance on fees paid to the federal government by health insurers. The ASU is based on the EITF's consensus on Issue 10-H reached at its June 2011 meeting, which the FASB ratified at the Board's July 13, 2011, meeting. The ASU's objective is to "address questions about how health insurers should recognize and classify in their income statements fees mandated by the Patient Protection and Affordable Care Act as amended by the Health Care and Education Reconciliation Act (the Acts)."

Next Steps: The ASU is effective for calendar years beginning after December 31, 2013.

Other Resources: Deloitte's June 2011 [EITF Snapshot](#). ●

Pension and Other Postretirement Benefit Plans

FASB Issues ASU on an Employer's Participation in Multiemployer Benefit Plans

Affects: Entities participating in multiemployer benefit plans.

Summary: On September 21, 2011, the FASB issued [ASU 2011-09](#), which amends ASC 715-80 by increasing the quantitative and qualitative disclosures an employer is required to provide about its participation in significant multiemployer plans that offer pension or other postretirement benefits. The ASU's objective is to enhance the transparency of disclosures about (1) the significant multiemployer plans in which an employer participates, (2) the level of the employer's participation in those plans, (3) the financial health of the plans, and (4) the nature of the employer's commitments to the plans.

Next Steps: For public entities, the new disclosure requirements are effective for fiscal years ending after December 15, 2011. However, for nonpublic entities, the effective date has been deferred by one year, to December 15, 2012. Early adoption is permitted for all entities.

Other Resources: Deloitte's September 23, 2011, [Heads Up](#). ●

IASB Amends Accounting for Postemployment Benefits

Affects: Entities reporting under IFRSs.

Summary: On June 16, 2011, the IASB issued amendments to IAS 19 that change the accounting for defined benefit plans and termination benefits. The most significant amendment requires an entity to recognize changes in defined benefit obligations and plan assets when they occur, thus eliminating the "corridor approach" permitted under the previous version of IAS 19. Entities will be required to segregate changes in the defined benefit obligation and in the fair value of plan assets into those associated with (1) service costs, (2) net interest on the net defined benefit liability (asset), and (3) remeasurements. The amendments also outline objectives for improving the understandability and usefulness of disclosures so that users of financial statements are better able to evaluate the financial effect of liabilities and assets arising from defined benefit plans. Further, the amendments address classification of employee benefits, termination benefits, and other practical issues.

Next Steps: The amendments are effective for annual periods beginning on or after January 1, 2013. Early application is permitted.

Other Resources: Deloitte's June 27, 2011, [Heads Up](#). ●

Pension Accounting Considerations Related to Change in Amortization Policy for Gains and Losses and in the Market-Related Value of Plan Assets

Affects: Entities with defined benefit pension and other postretirement benefit plans.

Summary: In early 2011, several entities announced plans to change their method of accounting for returns on plan assets and amortization of actuarial gains and losses in net periodic pension expense. For example, entities have decided to move to a mark-to-market approach in which they immediately recognize actuarial gains and losses outside the "corridor" as a component of net periodic pension cost. In an effort to accelerate the recognition of gains and losses in the income statement, entities have also changed from using a calculated value to using fair value in determining the market-related value of plan assets for the expected return calculation. In accordance with ASC 250, such entities have retrospectively applied these changes in accounting principles to their financial statements. Entities need to consider the significant implications and other considerations related to such accounting changes.

Other Resources: Deloitte's February 22, 2011, [Financial Reporting Alert](#). ●

Real Estate

FASB Issues ASU on Derecognition of In-Substance Real Estate*

Affects: Entities that have subsidiaries that are in-substance real estate.

Summary: On December 14, 2011, the FASB issued [ASU 2011-10](#), which is based on the EITF's final consensus on Issue 10-E (ratified by the FASB at the Board's November 30, 2011, meeting). The ASU addresses whether the guidance in ASC 360-20 on sales of real estate applies to derecognition events involving subsidiaries that are in-substance real estate.

Next Steps: For public entities, the ASU's amendments are effective prospectively for fiscal years (and interim periods within those years) beginning on or after June 15, 2012. For nonpublic entities, the ASU is effective for fiscal years ending after December 15, 2013, and interim and annual periods thereafter. Early adoption is permitted for both public and nonpublic entities.

Other Resources: Deloitte's November 2011 [EITF Snapshot](#). ●

Receivables

FASB Issues ASU on Troubled Debt Restructurings

Affects: All entities.

Summary: On April 5, 2011, the FASB issued [ASU 2011-02](#), which clarifies when a loan modification or restructuring is considered a troubled debt restructuring (TDR). The FASB believed that such additional clarification was needed because of the complexity of this evaluation, coupled with the increasing number of loan modifications, notably for residential mortgages but also for commercial real estate loans during the past year.

Next Steps: The ASU applies to both public and nonpublic entities as follows:

- *Public entities* — For TDR identification and disclosure purposes, the guidance is effective for the first interim or annual period beginning on or after June 15, 2011, and must be applied retrospectively to modifications occurring at or after the beginning of the annual period of adoption.
- *Nonpublic entities* — The ASU is effective for annual periods ending on or after December 15, 2012, including interim periods within those annual periods. Early adoption is permitted for any interim period in the fiscal year of adoption; however, nonpublic entities that elect early adoption should apply the guidance retrospectively to modifications occurring at or after the beginning of the annual period of adoption.

Other Resources: Deloitte's April 6, 2011, [Heads Up](#). ●

Revenue Recognition

FASB Issues ASU on Presentation and Disclosure of Patient Service Revenue Recognized by Health Care Entities

Affects: Health care entities.

Summary: On July 25, 2011, the FASB issued [ASU 2011-07](#), which provides guidance on presentation and disclosure of patient service revenue and the related provision for bad debts and allowance for doubtful accounts. The ASU is based on the EITF's consensus on Issue 09-H reached at its June 2011 meeting, which the FASB ratified at the Board's July 13, 2011, meeting. The ASU's objective is to "provide financial statement users with greater transparency about a health care entity's net patient service revenue and the related allowance for doubtful accounts." The ASU requires an entity, instead of showing bad debts as an operating expense, to present its patient service revenue net of its provision for bad debts in its statement of operations. In addition, the ASU calls for enhanced quantitative and qualitative disclosures about changes in the allowance for bad debts.

Next Steps: For public entities, the ASU is effective for fiscal years, and interim periods within those fiscal years, beginning after December 15, 2011. For nonpublic entities, the ASU is effective for the first annual period ending after December 15, 2012, and interim and annual periods thereafter. Early adoption is permitted for both public and nonpublic entities.

The amendments to the presentation of the provision for bad debts related to patient service revenue in the statement of operations should be applied retrospectively to all prior periods presented. The additional disclosure requirements should be applied prospectively.

Other Resources: Deloitte's June 2011 [EITF Snapshot](#). ●

Transfers and Servicing

FASB Amends Guidance on Effective Control in Repurchase Agreements

Affects: All entities.

Summary: On April 29, 2011, the FASB issued [ASU 2011-03](#), which eliminates from U.S. GAAP the requirement for entities to consider whether a transferor (i.e., seller) has the ability to repurchase the financial assets in a repurchase agreement ("repo"). This requirement was one of the criteria under ASC 860 that entities used to determine whether the transferor maintained effective control. Although entities must consider all the effective-control criteria under ASC 860, the elimination of this requirement may lead to more conclusions that a repo arrangement should be accounted for as a secured borrowing rather than as a sale.

Next Steps: The ASU is effective for the first interim or annual period beginning on or after December 15, 2011. The guidance should be applied prospectively to transactions or modifications of existing transactions that occur on or after the effective date. Early adoption is not permitted.

Other Resources: Deloitte's May 2, 2011, [Heads Up](#). ●

XBRL

SEC Staff Releases Observations Resulting From Review of XBRL Submissions

Affects: Public entities.

Summary: On December 13, 2011, the SEC staff in the Division of Risk, Strategy, and Financial Innovation published [observations](#) made during its review of XBRL submissions for the second quarter of 2011, which include the first submissions made by the third phase-in group as well as the first detailed tagged submissions of the second phase-in group. Although the staff noted that "overall, filings continue to indicate that filers are devoting significant effort to understand their responsibilities under this program, comply with the new rules and provide high-quality submissions," it still continues to identify a number of areas for improvement, many of which have been indicated in previous communications, including the staff's earlier [observations](#) published on June 15, 2011.

In addition, the staff in the SEC's Office of Interactive Disclosure recently updated its "[Staff Interpretations and FAQs Related to Interactive Data Disclosure](#)," which address questions about some of the more technical aspects of such disclosure requirements. Although these communications are not SEC rules, regulations, or statements, the staffs encourage registrants to "prepare future filings that are consistent with the themes of our observations." ●

FASB Introduces New Online Taxonomy Review and Comment System

Affects: Public entities.

Summary: On June 14, 2011, the FASB launched a new system that allows XBRL users to review and submit comments on the U.S. GAAP financial reporting taxonomy on a real-time basis. Comments are then "tracked and reviewed for potential inclusion in a subsequent Taxonomy release." Under the previous system, written comments on a "snapshot" of the taxonomy were due within a 60-day comment period.

Other Resources: For more information, see the [press release](#) on the FASB's Web site. ●

IASB Issues IFRS Taxonomy 2011

Affects: Entities reporting under IFRSs.

Summary: On March 25, 2011, the IFRS Foundation issued its IFRS Taxonomy 2011. This version of the taxonomy, which is a translation of IFRSs issued as of January 1, 2011, into XBRL, "has been expanded to include IFRS application and implementation guidance and IFRS illustrative examples." In addition, the 2011 taxonomy "consolidates all IFRS taxonomy interim releases that were published in 2010 for the use of early adopters wishing to report new IFRSs and improvements to IFRSs issued by the IASB in XBRL format."

Other Resources: For more information, see the [press release](#) on the IASB's Web site. ●

SEC Adopts 2011 U.S. GAAP Financial Reporting Taxonomy

Affects: Public entities that submit interactive data exhibits.

Summary: On March 1, 2011, the SEC adopted the 2011 U.S. GAAP taxonomy. The SEC staff is strongly encouraging entities to use the most recent taxonomies to submit their interactive data exhibits to EDGAR; however, given the timing of this release in conjunction with the phase-in requirements, entities are permitted to continue to use the 2009 U.S. GAAP taxonomy.

Other Resources: For more information, see the [press release](#) on the SEC's Web site. ●

Other Accounting

AICPA Issues Guidance on Fair Value Measurement for Not-for-Profit Entities

Affects: Not-for-profit entities.

Summary: On October 14, 2011, the AICPA issued a financial reporting [whitepaper](#) that provides not-for-profit entities with nonauthoritative fair value measurement guidance on (1) unconditional promises to provide cash or other financial assets, (2) beneficial interests in trusts, and (3) split-interest agreements.

Topics addressed in the whitepaper include:

- Valuation approaches and techniques.
- Using market inputs to value split interest.
- Unit of account for unconditional promises to give and beneficial interests in trust.
- Use of present value techniques to determine an appropriate discount rate.
- Disclosure considerations.

Other Resources: For more information, see the [press release](#) on the AICPA's Web site. ●

Other SEC Matters

AICPA Holds Annual Conference on SEC and PCAOB Developments*

Affects: Public entities.

Summary: On December 5–7, 2011, the AICPA held its annual National Conference on Current SEC and PCAOB Developments. This three-day conference features speeches by, as well as panel discussions and question-and-answer sessions with, members of the SEC, PCAOB, FASB, and IASB, as well as with professionals from various industries. The objective of the conference is to provide financial professionals with updates on new developments, regulations, and current priorities.

Other Resources: Deloitte's December 14, 2011, [Heads Up](#). ●

SEC Staff Publishes Reports on Incorporation of IFRSs as Part of Work Plan

Affects: SEC registrants.

Summary: On November 16, 2011, the SEC staff published the following two papers as part of its work plan for whether, when, and how to incorporate IFRSs into the U.S. financial system:

- [A Comparison of U.S. GAAP and IFRS](#) — Reviews 29 ASC topics and compares them with corresponding guidance in IFRSs, as applicable, focusing on the more significant differences between the two sets of standards.
- [An Analysis of IFRS in Practice](#) — Analyzes a selection of annual consolidated financial statements of both SEC registrants and nonregistrants that prepare their financial statements in accordance with IFRSs. The staff also identified topics frequently commented on by the SEC's Division of Corporation Finance in its reviews of the SEC filings of foreign private issuers that prepare their financial statements in accordance with IFRSs.

Other Resources: Deloitte's December 2, 2011, [Heads Up](#). Also see Deloitte's November 8, 2011, [Heads Up](#) for an analysis of comment letter trends related to the SEC's May 2011 staff paper on incorporating IFRSs into the U.S. financial reporting system. ●

SEC Updates Financial Reporting Manual During 2011*

Affects: Public entities.

Summary: During 2011, the SEC's Division of Corporation Finance published the following updates to its Financial Reporting Manual (FRM):

- *October 6, 2011* — Changes related to (1) ASU 2011-05, (2) requirements in proxy and registration statements (including continuous shelf offerings), (3) acquisition and disposition reporting requirements for variable interest entities, and (4) subsidiary guarantee release provisions.
- *September 1, 2011* — The revisions made in this update are stylistic only and affect the table of contents and Topic 1. FRM references related to affected areas have also been updated. The changes are not considered substantive and are not marked with date tags (which are generally included in the quarterly updates).
- *July 1, 2011* — The updates consist of changes related to combined periodic reporting, audit requirements for recently acquired guarantor subsidiaries, and reporting considerations in reverse acquisitions and capitalizations.
- *April 1, 2011* — The updates address, among other things, combined periodic reporting, income averaging, changes in accountants, and foreign private issuer financial statements. ●

SEC Issues Final Rule on Private Fund Reporting

Affects: Certain registered investment advisers.

Summary: On October 31, 2011, the SEC issued a [final rule](#) that implements Sections 404 and 406 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Dodd-Frank Act"). The final rule requires "registered investment advisers with at least \$150 million in private fund assets under management

to periodically file a new reporting form (Form PF)" to assist the Financial Stability Oversight Council in collecting private fund information and monitoring risks to the U.S. financial system. The investment advisers' size, which is determined on the basis of the amount of assets under management, will dictate the amount of information to be reported and the frequency of filing. Unlike the private fund information reported on Form ADV, the information reported on Form PF will remain confidential.

The SEC allows for a "two-stage phase-in period" for such advisers to comply with the Form PF filing requirement. According to the SEC's press release on the rule, most advisers will begin filing Form PF "following the end of their first fiscal year or fiscal quarter, as applicable, to end on or after Dec. 15, 2012." Advisers with \$5 billion or more in private fund assets must file Form PF "following the end of their first fiscal year or fiscal quarter, as applicable, to end on or after June 15, 2012."

Other Resources: For more information, see the [press release](#) on the SEC's Web site. ●

SEC Staff Issues Guidance on Shareholder Proposals

Affects: Public entities.

Summary: On October 21, 2011, the SEC's Division of Corporation Finance released [Staff Legal Bulletin 14F](#), which provides the Division's views on shareholders' eligibility to submit proposals in a company's proxy access materials under Rule 14a-8 of the Securities Exchange Act of 1934 (the "Exchange Act"). Specific topics addressed by the legal bulletin include the following:

- Which "types of brokers and banks . . . constitute 'record' holders under Rule 14a-8(b)(2)(i)." Under this provision, a beneficial owner must submit a record holder's written statement that the beneficial owner (i.e., the shareholder) is eligible to submit a proposal.
- Some "[c]ommon errors shareholders can avoid when submitting proof of ownership to companies."
- A shareholder's "submission of revised proposals."
- "Procedures for withdrawing no-action requests for proposals submitted by multiple proponents."
- The SEC's new process for transmitting Rule 14a-8 no-action responses by e-mail. ●

SEC Staff Issues Guidance on Legal and Tax Opinions in Registered Offerings

Affects: Public entities.

Summary: On October 14, 2011, the SEC issued [Staff Legal Bulletin 19](#), which provides the Commission's views on legal and tax opinions filed as part of a registered security offering. Specifically, the legal bulletin addresses (1) requirements for filing these opinions, (2) the SEC's perspective on "the required elements for these opinions and the staff's practices in reviewing them," and (3) "the filing of consents to include these opinions in registration statements." ●

SEC Issues Disclosure Guidance Addressing Cybersecurity Reporting Considerations

Affects: Public entities.

Summary: On October 13, 2011, the SEC's Division of Corporation Finance issued [guidance](#) highlighting its views on disclosure considerations related to cybersecurity risks and cyber incidents. The guidance is being issued in response to an increase in cybersecurity incidents, some of which have caused certain companies to incur significant remediation and other costs for (1) direct damages to the company (both real and reputational), (2) impacts on the company's customers, and (3) increased protection from future cybersecurity attacks. Cybersecurity risks and cyber incidents may therefore constitute material risks, known trends, or uncertainties that a registrant should consider disclosing in SEC filings. Specifically, the staff's guidance addresses considerations related to disclosure and the level of disclosure (1) in a registrant's MD&A and financial statements, (2) related to risk factors and legal proceedings, and (3) in connection with disclosure controls and procedures. ●

U.S. Court of Appeals Vacates Rule 14a-11

Affects: Public entities.

Summary: On September 14, 2011, the U.S. Court of Appeals issued a mandate vacating Rule 14a-11 of the Exchange Act, which was added by [SEC Final Rule 33-9136](#) (the "proxy access" rule). SEC Chairman Mary L. Schapiro indicated in a recent statement that the SEC will request neither a rehearing nor a Supreme Court review of the court's decision. ●

One-Year Update on Dodd-Frank Act Rulemaking Efforts

Affects: Public entities.

Summary: In response to the provisions of the Dodd-Frank Act, over the past year, the SEC has finalized a number of provisions, completed a number of studies and reports for Congress, and exposed various proposals for public comment. Provisions of the Dodd-Frank Act that affect a large cross-section of SEC registrants include those on corporate governance, executive compensation, asset-backed securities (ABSs), over-the-counter derivatives and swaps, and specialized disclosures.

Other Resources: Deloitte's September 1, 2011, [Heads Up](#). ●

SEC Issues C&DIs on Exchange Act Forms and Non-GAAP Financial Measures

Affects: Public entities.

Summary: On July 8, 2011, the SEC's Division of Corporation Finance issued the following C&DIs on Exchange Act forms and non-GAAP financial measures:

- Exchange Act Form 12b-25, [Question 107.02](#), which addresses when the filing of an issuer's Form 10-K may be considered timely.
- Exchange Act Form 8-K, [Questions 121A.03](#) and [121A.04](#), which discuss disclosure of a number of broker nonvotes related to frequency of shareholder advisory votes on executive compensation and how frequently a registrant will include a shareholder advisory vote on executive compensation in its proxy.
- Non-GAAP Financial Measures, [Question 108.01](#), which addresses compensation discussion and analysis (CD&A) and other proxy areas.

In addition, the Division withdrew Question 116.08 from the Regulation S-K C&DIs and added others on proxy-related items, including the following:

- Item 401, "Directors, Executive Officers, Promoters and Control Persons."
 - [Question 116.10](#), which addresses disclosures about directors whose terms would not continue after the annual shareholders' meeting.
- Item 402(b), "Executive Compensation; Compensation Discussion and Analysis."
 - [Question 118.08](#), which clarifies that "Instruction 5 to Item 402(b) is limited to CD&A disclosure of target levels that are non-GAAP financial measures."
- Item 402(c), "Executive Compensation; Summary Compensation Table."
 - [Question 119.28](#), which explains that "the grant date fair value for stock and option awards subject to performance conditions must be reported based on the probable outcome of the performance conditions as of the grant date."

On July 8, 2011, the Division also issued a [statement](#) with the C&DIs that outlines a framework for when a well-known seasoned issuer (WKSI) that has violated antifraud provisions may seek to obtain a waiver from the Division to retain its WKSI status. ●

SEC Approves Final Rule on Security Ratings

Affects: Public entities.

Summary: On July 26, 2011, in accordance with Section 939A of the Dodd-Frank Act, the SEC unanimously adopted a [final rule](#) that addresses the use of credit ratings in the offering of securities ("security ratings"). The final rule is substantially similar to the rule proposed in February 2011.

The rule replaces requirements that rely on, or make special accommodations for, security ratings offered on short-form or "shelf" registration statements (e.g., Forms S-3 and F-3) with alternative requirements. Thus, the proposed rule may affect certain registrants' eligibility to use shelf registration statements.

Registrants have included security ratings information in Forms S-3 and F-3 because a way for them to be eligible to offer nonconvertible securities on a shelf registration statement is for such securities to be rated "investment grade" by at least one nationally recognized statistical rating organization. The rule proposes requirements similar to those related to a registrant's attaining WSKI status. Most notable is the need for the issuer to have offered at least \$1 billion of nonequity and nonconvertible securities under the Securities Act of 1933 for cash within the past three years — measured within 60 days of the filing of the registration statement subject to certain provisions.

Next Steps: The rule became effective September 2, 2011, and certain amendments will become effective on December 31, 2012.

Other Resources: For more information, see the [press release](#) on the SEC's Web site. ●

SEC Adopts Dodd-Frank Act Amendments to Investment Advisers Act

Affects: Entities subject to regulation under the Investment Advisers Act of 1940.

Summary: On June 22, 2011, the SEC issued a [final rule](#) that amends the Investment Advisers Act in response to certain requirements of the Dodd-Frank Act. The amendments "increase the statutory threshold for registration by investment advisers with the Commission, require advisers to hedge funds and other private funds to register with the Commission, and require reporting by certain investment advisers that are exempt from registration." The SEC also adopted amendments to the pay-to-play rule.

Next Steps: The rules regarding exemptions for venture capital fund and certain private fund advisers became effective on July 21, 2011. The rules allow for a transitional exemption period under which private advisers, including hedge fund and private equity fund advisers, do not have to register until March 30, 2012. All other amendments became effective September 19, 2011.

Other Resources: For more information, see the [press release](#) on the SEC's Web site. ●

SEC Issues Exemptive Order for Temporary Exemption and Relief From New Security-Based Swap Regulations

Affects: Public entities.

Summary: On June 15, 2011, the SEC issued an [exemptive order](#) that grants temporary relief to market participants from complying with certain requirements under Title VII¹ of the Dodd-Frank Act for security-based swap transactions. The order also identifies certain requirements that will apply (as planned) to security-based swap transactions as of the July 16, 2011, effective date and provides temporary relief from Section 29(b) of the Dodd-Frank Act, which voids any contracts made in violation of any provision of the Exchange Act.

Other Resources: For more information, see the [press release](#) on the SEC's Web site. ●

¹ Title VII establishes a comprehensive framework for regulating over-the-counter derivatives. It gives the Commission the authority to regulate "security-based swaps" and was intended to take effect on July 16, 2011, approximately one year after the Dodd-Frank Act's enactment date. The Commission plans to develop a detailed plan to ensure that the Title VII regulations can be implemented efficiently and cost-effectively.

SEC Adopts Whistleblower Regulations

Affects: Public entities.

Summary: On May 25, 2011, the SEC issued a [final rule](#) to implement the whistleblower provisions of the Dodd-Frank Act. Under these provisions, the SEC must pay an award "to eligible whistleblowers who voluntarily provide the Commission with original information about a violation of the federal securities laws that leads to the successful enforcement of a covered judicial or administrative action, or a related action." Among other things, the final rule defines the term "whistleblower" and outlines anti-retaliation protections for individuals who provide the SEC with information about possible securities violations.

Other Resources: Deloitte's June 2011 [Hot Topics](#). ●

SEC Publishes Findings and Recommendations From Study on Compliance With Section 404(b)

Affects: Public entities with a public float between \$75 million and \$250 million and their auditors.

Summary: On April 22, 2011, the SEC published its [findings and recommendations](#) in response to its September 2010 request for comments about how the Commission could reduce the costs associated with compliance with Section 404(b) of the Sarbanes-Oxley Act of 2002. The study was mandated by Section 989G(b) of the Dodd-Frank Act. Section 404(b) only addresses the auditor attestation requirement related to a company's ICFR.

On the basis of the results of the study, the Commission (1) concluded that "auditor involvement promotes more accurate and reliable reporting" in the assessment of ICFR and (2) made the following two broad recommendations:

- Section 404(b) should continue to apply to domestic registrants and foreign private issuers whose market capitalization is between \$75 million and \$250 million. The SEC did not recommend a permanent exemption from Section 404(b) because the study did not conclusively show that (1) the benefit of any cost savings from such an accommodation would justify the loss of investor protections or (2) such cost savings would result in an increase or a decrease in initial public offerings, because the cost of complying with Section 404(b) is only one of many factors companies consider when deciding whether to access the U.S. capital markets.
- Activities should be identified and implemented that could further improve how Section 404(b) is applied. For example, the SEC suggested that the PCAOB consider offering observations on the basis of what it notes in conducting inspections of PCAOB-registered firms.

Other Resources: For more information, see [CAQ Alert 2011-11](#). ●

SEC Issues C&DIs on Securities Offerings and Proxy-Related Items

Affects: Public entities.

Summary: On March 4, 2011, the SEC's Division of Corporation Finance issued C&DIs addressing topics in (1) Regulation FD (in conjunction with exempt offerings); (2) Rule 144(d), *Holding Period for Restricted Securities*; (3) Rule 144(h), *Notice of Proposed Sale*; (4) Rule 430B, *Prospectus in a Registration Statement After Effective Date*; and (5) Rule 433, *Conditions to Permissible Post-Filing Free Writing Prospectuses*. In addition, the Division issued new Regulation S-K C&DIs on proxy-related items, including the following:

- Section 116 — Item 401, "Directors, Executive Officers, Promoters and Control Persons."
 - [Question 116.09](#), which indicates that an entity must disclose information about a director's business experience when the director is appointed by preferred stockholders (in a manner similar to the information required when the board of directors nominates a director candidate).

- Section 118 — Item 402(b), "Executive Compensation: Compensation Discussion and Analysis" (CD&A).
 - [Question 118.07](#), which clarifies that a registrant is not required to discuss, in the CD&A section of a proxy statement, "executive compensation, including performance target levels, to be paid in the current year or in future years." However, the CD&A may need to address "actions regarding executive compensation that were taken after the registrant's last fiscal year end" to the extent that such actions could "affect a fair understanding of the named executive officer's compensation for the last fiscal year." ●

SEC Issues SAB 114

Affects: Public entities.

Summary: On March 7, 2011, the SEC's Office of the Chief Accountant and Division of Corporation Finance issued [SAB 114](#). The SAB is intended to harmonize interpretive guidance in the codified SABs with current authoritative accounting guidance in the *FASB Accounting Standards Codification*. While certain portions of the codified SABs were revised or rescinded, the main changes represent updates to accounting guidance references and "other conforming changes to ensure consistency of referencing throughout the SAB Series." ●

CAQ Publishes Alert Reminding Auditors of EDGAR Signature Requirements

Affects: Auditors of public entities.

Summary: On February 14, 2011, the CAQ published [Alert 2011-04](#) in response to a recent communication from the SEC staff to the CAQ SEC Regulations Committee. The alert reminds auditors (1) that registrants must include signed audit reports in EDGAR filings and (2) of additional requirements related to typed "signatures" in electronic submissions. The alert indicates that the "SEC staff believes that readers should be able to easily determine the name of the firm that audited the financial statements and therefore will request amendments for any filings that do not comply with the Commission's requirements." ●

SEC's Focus on Compliance With Loss Contingency Disclosures

Affects: Public entities.

Summary: The SEC continues to focus on registrants' compliance with existing disclosure requirements under ASC 450-20 in connection with litigation contingencies. In addition, the FASB continues to evaluate the extent of compliance and improvement in registrants' disclosures in redeliberating its proposed ASU on disclosures about certain loss contingencies. Thus, certain aspects of loss contingency disclosures will continue to be subject to heightened scrutiny this reporting season.

Other Resources: Deloitte's [SEC Comment Letters — Including Industry Insights: Improving Transparency](#) and February 3, 2011, [Financial Reporting Alert](#). ●

SEC Issues C&DIs on Say-on-Pay Requirements

Affects: Public entities.

Summary: On February 11, 2011, the SEC's Division of Corporation Finance issued new C&DIs related to "say on pay," "say on frequency," and golden parachute votes and disclosures in a proxy statement. The new C&DIs include the following:

- Exchange Act Rules, Section 169 — Rule 14a-21.
 - New Questions [169.01](#), [169.02](#), and [169.03](#) — Clarify the application of the following to smaller reporting companies: (1) shareholder approval of executive compensation, (2) frequency of votes, and (3) approval of golden parachute compensation in a merger or acquisition.
 - New Question [169.04](#) — Explains that say-on-frequency votes do not have to be in the form of a "resolution."

- New Questions [169.05](#) and [169.06](#) — Address the wording that may be used in a proxy statement to describe the say-on-pay vote and the say-on-frequency vote, respectively.
- Regulation S-K, Item 402(t) — Golden parachute compensation.
 - New Question [128B.01](#) — Clarifies which of a registrant's executives would be subject to Item 402(t) regarding the golden parachute vote and related disclosures. ●

SEC Issues Final Rules on "Say on Pay" and "Say on Golden Parachutes"

Affects: Public entities.

Summary: On January 25, 2011, the SEC issued a [final rule](#) on "say-on-pay" and "say-on-golden-parachute" provisions under Section 951 of the Dodd-Frank Act. The rule requires entities to conduct say-on-pay votes once every three years (beginning with the first annual shareholders' meeting on or after January 21, 2011). Frequency votes to allow shareholders to determine how often they would like to have the say-on-pay votes are also required once every six years. In addition, the rule requires disclosure of certain golden-parachute compensation arrangements when shareholder votes are solicited to approve a merger or acquisition and would call for separate advisory votes to approve golden-parachute arrangements under certain circumstances. The rule also provides for a two-year deferral for smaller reporting companies.

Other Resources: For more information, see Deloitte's Center for Corporate Governance February 2011 [Hot Topics — Special Edition](#). ●

SEC Issues Final Rules on Asset-Backed Securities

Affects: Issuers and securitizers of ABSs under SEC Regulation AB.

Summary: On January 20, 2011, the SEC issued the following rules on offerings of ABSs under Sections 943 and 945 of the Dodd-Frank Act:

- [Final Rule 33-9175](#), which (1) requires securitizers of ABSs to provide tabular disclosures in various filings of fulfilled and unfulfilled repurchase requests for an initial three-year "lookback" period ending December 31, 2011, and quarterly thereafter and (2) requires nationally recognized statistical ratings organizations to "include information regarding the representations, warranties and enforcement mechanisms available to investors in an [ABS] offering in any report accompanying a credit rating issued in connection with such offering, including a preliminary credit rating." Effective dates vary on the basis of the filings required by certain rules and regulations discussed in the final rule.
- [Final Rule 33-9176](#), which:
 - Requires "any issuer registering the offer and sale of an [ABS] to perform a review of the assets underlying the ABS." However, the final rule clarifies that an issuer may hire a third party to perform the review as long as the issuer (1) names the third party and (2) obtains the third party's consent if the issuer relies on, or attributes the ABS asset pool review findings and conclusions to, the third party.
 - Specifies a minimum review standard that requires the issuer to obtain "reasonable assurance" that pool asset disclosures are "accurate in all material respects."
 - Requires an ABS issuer to provide additional disclosures, including (1) the nature of the issuer's review of the asset pool and the related findings and conclusions and (2) additional information regarding assets in the pool that do not meet underwriting standards.

Issuers of registered ABS offerings are expected to comply with the final rule beginning with initial bona fide offers after December 31, 2011.

Other Resources: For more information, see the [press release](#) on the SEC's Web site. ●

SEC Issues C&DIs Related to Changes in Accountants

Affects: Public entities.

Summary: On January 14, 2011, the SEC's Division of Corporation Finance issued new [C&DIs](#) on disclosures about changes in accountants, as required by Regulation S-K, Item 304, and Form 8-K, Item 4.01. The Regulation S-K disclosures are required for a registrant's two most recent fiscal years and any subsequent interim period. The following C&DIs were added:

- Regulation S-K, Item 304, "Changes in and Disagreements With Accountants on Accounting and Financial Disclosure."
 - Question 111.01 — Clarifies the term "subsequent interim period."
 - Question 111.02 — Indicates that no affirmative response is needed if there are no reportable events.
 - Questions 111.03 and 111.04 — Specify that a registrant is required to disclose a material weakness identified by a former principal accountant or its remediation.
 - Questions 111.05 and 111.06 — Note that disclosure is required when former principal accountants issue (1) audit reports on a registrant's financial statements "containing an explanatory paragraph regarding a registrant's ability to continue as a going concern," when these reports constitute a report modification, or (2) audit reports on a registrant's ICFR that include modifications, adverse opinions, or disclaimers of opinions.
 - Question 111.07 — Clarifies that a registrant should disclose the reason for a change in accountant if the change is due to revocation of the accountant's PCAOB registration.
- Form 8-K, Item 4.01, "Changes in Registrant's Certifying Accountant."
 - Questions 114.01–03. ●

Other Auditing

PCAOB Standing Advisory Group Holds November Meeting*

Affects: Registered public accounting firms.

Summary: At the November 9–10, 2011, PCAOB Standing Advisory Group (SAG) meeting, the PCAOB provided an update on recent developments, including an overview of its current and future standard-setting activities. In addition, the PCAOB and SAG discussed the following: auditor independence and audit firm rotation, going concern, fair value pricing sources, improving the transparency of audits, year-end audit risk and financial reporting issues, and public comments on the PCAOB's concept release on the auditor's reporting model.

Next Steps: The next SAG meeting is scheduled for May 16–17, 2012.

Other Resources: Deloitte's December 16, 2011, [Heads Up](#). ●

PCAOB Issues Staff Audit Practice Alert 9*

Affects: Registered public accounting firms.

Summary: On December 6, 2011, the PCAOB issued [Staff Audit Practice Alert 9](#), which provides auditors with nonauthoritative guidance on assessing and responding to risks that may lead to material misstatement in the financial statements as a result of the current economic environment.

Other Resources: For more information, see the [press release](#) on the PCAOB's Web site. ●

PCAOB Enters Into Cooperative Agreement With the Netherlands*

Affects: Registered public accounting firms.

Summary: On December 5, 2011, the PCAOB publicly announced that it has entered into an agreement with the Netherlands Authority for the Financial Markets (AFM). The agreement serves as a framework for overseeing auditors that practice in each of the regulators' two jurisdictions. In addition, in a manner consistent with the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Dodd-Frank Act"), the agreement includes provisions governing the exchange of confidential information between the AFM and the PCAOB.

Other Resources: For more information, see the [press release](#) on the PCAOB's Web site. ●

ASB Issues SASs 122–124 as Part of Clarity Project

Affects: All entities.

Summary: In October 2011, the ASB issued the following [SASs](#) as part of its [Clarity Project](#) (i.e., the AICPA's effort to improve understanding of, and compliance with, U.S. GAAS):

- No. 122, *Statements on Auditing Standards: Clarification and Recodification*, which includes the preface to the AICPA's SAS codification, *Principles Underlying an Audit Conducted in Accordance With Generally Accepted Auditing Standards*, as well as 39 clarified SASs.
- No. 123, *Omnibus Statement on Auditing Standards — 2011*, which amends SASs 117, 118, and 122 to conform their requirements, thereby enhancing transparency.
- No. 124, *Financial Statements Prepared in Accordance With a Financial Reporting Framework Generally Accepted in Another Country*, which supersedes SAS 51. The new SAS requires "the auditor, in instances where a report that is to be used in the United States was prepared in accordance with a financial reporting framework generally accepted in another country, to include an emphasis-of-matter paragraph to highlight the foreign financial reporting framework, but permits the auditor to express an unqualified opinion."

Next Steps: SASs 122–124 are effective for audits of financial statements for periods ending on or after December 15, 2012. ●

PCAOB Publishes Practice Alert on Audit Risks in Certain Emerging Markets

Affects: Registered public accounting firms.

Summary: On October 3, 2011, the PCAOB issued [Staff Audit Practice Alert 8](#) to increase auditors' awareness of risks of misstatement due to fraud that might be encountered during audits of companies with operations in emerging markets. The alert highlights auditors' responsibilities for addressing such fraud risks and discusses certain other auditor responsibilities under PCAOB auditing standards. In addition, the alert gives examples of some conditions and situations that would indicate a heightened fraud risk. The PCAOB's observations are based on its oversight activities as well as on reviews of company filings with the SEC.

Other Resources: Deloitte's October 13, 2011, [Heads Up](#). ●

AICPA Issues Revision to Audit and Accounting Guide on Health Care Entities

Affects: Health care entities and their auditors.

Summary: In 2011, the AICPA issued the first comprehensive revision (containing updates made as of July 1, 2011) since 1996 of its [audit and accounting guide](#) on health care entities, which contains nonauthoritative guidance on preparing and auditing health care entities' financial statements. Updates include expanded discussions of (1) financial accounting and reporting associated with managed care services and continuing care retirement communities, (2) other topics related to the health care industry (e.g., medical malpractice claims, patient receivables and revenue recognition, and the reporting entity and related entities), and (3) revisions to reflect changes in audit and accounting guidance. The guide also contains the following five new chapters:

- Chapter 3, "Unique Financial Statement Considerations for Not-for-Profit Health Care Entities."

- Chapter 5, "Derivatives."
- Chapter 7, "Municipal Bond Financing."
- Chapter 11, "Contributions Received and Made."
- Chapter 15, "Unique Considerations of State and Local Governmental Health Care Entities." ●

CAQ Issues Alert on PCAOB Research Note Related to Audits of Foreign Operations of U.S. Registrants

Affects: Registered public accounting firms.

Summary: On March 23, 2011, the CAQ issued an [alert](#) related to the issuance of a research note by the PCAOB's Office of Research and Analysis. In the research note, the PCAOB reminded auditors of its Staff Audit Practice Alert 6 on using the work of other auditors and engaging assistants from outside the firm. The CAQ alert indicates that the practice alert summarizes "instances of non-compliance where U.S. firms provided audit services for companies with substantially all their operations in another country by having most or all of the audit performed by another firm or assistants engaged from outside the firm." ●

ASB Issues Clarified SAS as Part of Clarity Project

Affects: Auditors.

Summary: In March 2011, the ASB issued a clarified SAS that supersedes SAS 37 and provides guidance on "the auditor's responsibilities in connection with financial statements of a nonissuer included or incorporated by reference in a registration statement filed with the U.S. Securities and Exchange Commission (SEC) under the Securities Act of 1933, as amended."

The clarified SASs are part of both the ASB's Clarity Project (an attempt to make U.S. GAAS easier to read, understand, and apply) and its efforts to converge with the IAASB's International Standards on Auditing (ISAs). ●

AICPA Issues SSARS on Revised Applicability of Statements on Standards for Accounting and Review Services

Affects: Auditors.

Summary: In February 2011, the AICPA Accounting and Review Services Committee issued [SSARS 20](#), which amends AR Section 90 so that SSARSs do not apply when SAS 100, as amended by SASs 116 and 121, is applicable.

Next Steps: The SSARS is effective for reviews of financial statements for periods beginning after December 15, 2011; early application is permitted. ●

ASB Issues SAS to Revise Applicability of Existing Standard on Interim Financial Information

Affects: Auditors.

Summary: In February 2011, the ASB issued [SAS 121](#), which revises SAS 100 by amending paragraph 5 of AU Section 722. The revised guidance would be applicable "when the accountant audited the entity's latest annual financial statements, and the appointment of another accountant to audit the current year financial statements is not effective prior to the beginning of the period covered by the review."

Next Steps: The SAS is effective for interim reviews of interim financial information for periods beginning after December 15, 2011; early application is permitted. ●

AICPA Provides Guidance on Next-Generation SAS 70 Report

Affects: Auditors.

Summary: On February 1, 2011, the AICPA published guidance on the new service organization control (SOC) reports that it has designed to replace existing SAS 70 reports. These reports are prepared under SSAE 16 and AT Section 101, which establish the requirements for and guidance on reporting on controls at a service organization. The reports are as follows:

- SOC 1 Report, *Report on Controls at a Service Organization Relevant to User Entities' Internal Control Over Financial Reporting*.
- SOC 2 Report, *Report on Controls at a Service Organization Relevant to Security, Availability, Processing Integrity, Confidentiality or Privacy*.
- SOC 3 Report, *Trust Services Report for Service Organizations*.

Other Resources: For more information, see the [press release](#) on the AICPA's Web site. ●

Other International

IASB Clarifies Accounting for Costs Associated With Waste Removal in Surface Mining

Affects: All entities.

Summary: On October 19, 2011, the IASB released IFRIC Interpretation 20, which provides guidance on accounting for stripping costs in the production phase of a surface mine. Under the interpretation, the costs of a stripping activity (i.e., a waste removal process) should be (1) accounted for in accordance with IAS 2 insofar as they result in the production of inventory and (2) recognized as a noncurrent asset, subject to meeting certain criteria, to the extent that they improve access to mineral ore deposits.

Next Steps: The interpretation is effective for annual periods beginning on or after January 1, 2013; early application is permitted.

Other Resources: Deloitte's October 2011 *IFRS in Focus* article. Also see the [press release](#) on the IASB's Web site. ●

IASB Publishes Effect Analyses of IFRS 10, IFRS 11, and IFRS 12

Affects: Entities reporting under IFRSs.

Summary: In [July](#) and [September 2011](#), the IASB released "effect analyses" of the following standards:

- IFRS 10, *Consolidated Financial Statements*.
- IFRS 11, *Joint Arrangements*.
- IFRS 12, *Disclosure of Interest in Other Entities*.

The purpose of the analyses is to provide insight into the potential impacts of these three standards. As part of the analysis, the IASB uses "certain case studies and other quantitative and qualitative materials, as appropriate."

Next Steps: IFRS 10, IFRS 11, and IFRS 12 are effective for annual periods beginning on or after January 1, 2013. Early application is permitted.

Other Resources: For more information, see the [press release](#) on the IASB's Web site. ●

FASAB Matters

FASAB Issues Implementation Guidance on the Disposal of General Property, Plant, and Equipment

Affects: U.S. federal government entities.

Summary: On October 6, 2011, the FASAB issued a [technical release](#) that contains implementation questions on accounting for disposals of property, plant, and equipment.

Other Resources: For more information, see the [press release](#) on the FASAB's Web site. ●

FASAB Approves Plan to Address Federal Lease Accounting Standards

Affects: U.S. federal government entities.

Summary: At its August 2011 meeting, the FASAB ratified a proposal to amend its current lease accounting standards, Statements 5 and 6, whose guidance has been heavily criticized. As part of this proposal, the FASAB will consider the final decisions reached by the FASB and IASB in their joint project on leases (in progress), since the guidance in the FASAB's Statements was largely based on the FASB's original leasing

standards. However, in response to the often asked question of whether "federal entities that present general purpose financial reports in conformance with SFFAS 34 [will be required] to follow [the] new FASB/IASB lease accounting standards," the FASAB's succinct answer was no: the FASB/IASB standards "will not automatically change federal financial accounting standards."

Other Resources: For more information, see the [press release](#) on the FASAB's Web site. ●

FASAB Issues Concepts Statement on Measuring the Elements of Accrual-Basis Financial Statements in Periods After Initial Recording

Affects: U.S. federal government entities.

Summary: On August 16, 2011, the FASAB issued a [concepts statement](#) on measurement of the elements of accrual-basis financial statements. The concepts statement "defines terms used in measuring assets, liabilities, and other elements and discusses areas for consideration by the Board when it deliberates measurement standards in the future." It does not change existing accounting literature.

Other Resources: For more information, see the [press release](#) on the FASAB's Web site. ●

FASAB Issues Technical Bulletin on Accounting for Federal Natural Resources Other Than Oil and Gas

Affects: U.S. federal government entities.

Summary: On July 6, 2011, the FASAB issued a [technical bulletin](#) that clarifies federal entities' reporting requirements related to the "government's estimated royalties and other revenue from federal natural resources that are (1) under lease, contract or other long-term agreement and (2) reasonably estimable as of the reporting date in required supplementary information" (these requirements are outlined in FASAB Statement 38). The bulletin's purpose is to increase transparency in reporting and establish better controls over the management of federal natural resource assets.

Also on July 6, the FASAB issued [Statement 41](#), which defers the effective date of Statement 38 for one year (to periods beginning after September 30, 2012).

Next Steps: The technical bulletin is effective for periods beginning after September 30, 2013. Early application is encouraged.

Other Resources: For more information, see the [press release](#) on the FASAB's Web site. ●

FASAB Issues Standard on Definitional Changes Related to Deferred Maintenance and Repairs

Affects: U.S. federal government entities.

Summary: On May 11, 2011, the FASAB issued [Statement 40](#), which amends Statement 6 to "(1) clarify that 'deferred maintenance' reporting includes deferred repairs, (2) revise the examples of maintenance and repair activities to better reflect current practices and encompass activities associated with heritage assets, multi-use heritage assets, and stewardship land as well as equipment and other personal property, and (3) address issues related to the distinction between maintenance, repairs, and new capital expenditures."

Next Steps: Statement 40 is effective for periods beginning after September 30, 2011; earlier adoption is encouraged.

Other Resources: For more information, see the [press release](#) on the FASAB's Web site. ●

GASB Matters

GASB Requests Comment on Proposal on Assessing Economic Condition of Governments*

Affects: Governmental entities.

Summary: On November 29, 2011, the GASB issued a [preliminary views document](#) that requests comment on a proposal under which state and local governments would provide "five-year projections of cash inflows, cash outflows, and financial obligations that would accompany their financial statements as required supplementary information." The GASB has indicated that the purpose of this proposal would be "to better enable taxpayers, bond holders, and other interested parties to assess a government's financial health."

Next Steps: Comments on the preliminary views document are due by March 16, 2012.

Other Resources: For more information, see the [press release](#) on the GASB's Web site. ●

GASB Issues Statement on Hedge Accounting

Affects: Governmental entities.

Summary: On July 13, 2011, the GASB issued [Statement 64](#) to clarify that hedge accounting should continue to apply after the replacement of a swap counterparty or a swap counterparty's credit support provider when the following criteria are met:

- It is probable that the swap payments will be collectible.
- The replacement qualifies as an assignment or in-substance assignment.
- The counterparty or counterparty credit support provider (and not the government) defaulted on or terminated the relationship.

Next Steps: Statement 64 is effective for periods beginning after June 15, 2011. Early application is encouraged.

Other Resources: For more information, see the [press release](#) on the GASB's Web site. ●

GASB Issues Statement on Financial Statement Presentation

Affects: Governmental entities.

Summary: On July 13, 2011, the GASB issued [Statement 63](#), which provides guidance on financial reporting of deferred inflows and outflows of resources. Under Statement 63, entities report deferred outflows and inflows of resources separately from assets and liabilities in a new statement of position format. Statement 63 also amends Statement 34 and other existing standards "to reflect the residual measure in the statement of financial position as net position, rather than net assets."

Next Steps: Statement 63 is effective for financial statements for periods beginning after December 15, 2011. Early application is encouraged.

Other Resources: For more information, see the [press release](#) on the GASB's Web site. ●

Appendix A: Significant Adoption Dates and Deadlines

The chart below illustrates significant adoption dates and deadline dates for the FASB, EITF, AICPA/FinREC, SEC, PCAOB, GASB/GAO, FASAB, and international standards. Content recently added or revised is highlighted in green.

FASB	Affects	Status
Significant Adoption Dates		
ASU 2011-12, <i>Deferral of the Effective Date for Amendments to the Presentation of Reclassifications of Items Out of Accumulated Other Comprehensive Income in Accounting Standards Update No. 2011-05</i>	Entities that report items of other comprehensive income.	<p><i>Public entities</i> — The ASU is effective for fiscal years, and interim periods within those years, beginning after December 15, 2011.</p> <p><i>Nonpublic entities</i> — The ASU is effective for fiscal years ending after December 15, 2012, and interim and annual periods thereafter.</p> <p>For both public and nonpublic entities, early adoption is permitted and transition disclosures are not required. In addition, the ASU must be applied retrospectively to all periods presented.</p>
ASU 2011-11, <i>Disclosures About Offsetting Assets and Liabilities</i>	All entities.	Effective for annual reporting periods beginning on or after January 1, 2013, and interim periods therein; retrospective application is required.
ASU 2011-10, <i>Derecognition of in Substance Real Estate — a Scope Clarification</i> — a consensus of the FASB Emerging Issues Task Force	Entities that have subsidiaries that are in-substance real estate.	For public entities, the ASU's amendments are effective prospectively for fiscal years (and interim periods within those years) beginning on or after June 15, 2012. For nonpublic entities, the ASU is effective for fiscal years ending after December 15, 2013, and interim and annual periods thereafter. Early adoption is permitted for both public and nonpublic entities.
ASU 2011-09, <i>Disclosures About an Employer's Participation in a Multiemployer Plan</i>	Entities with multiemployer benefit plans.	For public entities, the ASU is effective for fiscal years ending after December 15, 2011. For nonpublic entities, the ASU is effective for fiscal years ending after December 15, 2012. Early adoption is permitted for all entities.
ASU 2011-08, <i>Testing Goodwill for Impairment</i>	Entities with recorded goodwill.	Effective for fiscal years beginning after December 15, 2011. Early adoption is permitted.
ASU 2011-07, <i>Presentation and Disclosure of Patient Service Revenue, Provision for Bad Debts, and the Allowance for Doubtful Accounts for Certain Health Care Entities</i> — a consensus of the FASB Emerging Issues Task Force	Health care organizations.	For public entities, the ASU is effective for fiscal years, and interim periods within those fiscal years, beginning after December 15, 2011. For nonpublic entities, the ASU is effective for the first annual period ending after December 15, 2012, and interim and annual periods thereafter. Early adoption is permitted for both public and nonpublic entities.
ASU 2011-06, <i>Fees Paid to the Federal Government by Health Insurers</i>	Entities that provide health insurance and that are required to pay the U.S. government a fee calculated on the basis of net premiums and third-party administrative agreement fees.	Effective for calendar years beginning after December 31, 2013.
ASU 2011-05, <i>Presentation of Comprehensive Income</i>	All entities.	<p>Amendments made by ASU 2011-05 to ASC 220-10-45-17 through 45-18, ASC 220-10-55-7 through 55-8, ASC 220-10-55-9, and ASC 220-10-55-18 are superseded by ASU 2011-12.</p> <p><i>Public entities</i> — The amendments are effective for fiscal years, and interim periods within those years, beginning after December 15, 2011.</p> <p><i>Nonpublic entities</i> — The amendments are effective for fiscal years ending after December 15, 2012, and interim and annual periods thereafter.</p> <p>For both public and nonpublic entities, early adoption is permitted and transition disclosures are not required. In addition, the ASU must be applied retrospectively to all periods presented.</p>

ASU 2011-04, <i>Amendments to Achieve Common Fair Value Measurement and Disclosure Requirements in U.S. GAAP and IFRS</i>	All entities.	<i>Public entities</i> — The ASU is effective prospectively for interim and annual periods beginning after December 15, 2011. Earlier application is not permitted. <i>Nonpublic entities</i> — The ASU is effective prospectively for annual periods beginning after December 15, 2011. Earlier application is permitted, but no earlier than for interim periods beginning after December 15, 2011.
ASU 2011-03, <i>Reconsideration of Effective Control for Repurchase Agreements</i>	All entities.	Effective for the first interim or annual period beginning on or after December 15, 2011. The guidance should be applied prospectively to transactions or modifications of existing transactions that occur on or after the effective date. Early adoption is not permitted.
ASU 2011-02, <i>A Creditor's Determination of Whether a Restructuring Is a Troubled Debt Restructuring</i>	All entities.	<i>Public entities</i> — For troubled debt restructuring identification and disclosure purposes, the guidance is effective for the first interim or annual period beginning on or after June 15, 2011, and must be applied retrospectively to modifications occurring at or after the beginning of the annual period of adoption. <i>Nonpublic entities</i> — The ASU is effective for annual periods ending on or after December 15, 2012, including interim periods within those annual periods. Early adoption is permitted for any interim period in the fiscal year of adoption; however, nonpublic entities that elect early adoption should apply the guidance retrospectively to modifications occurring at or after the beginning of the annual period of adoption.
ASU 2011-01, <i>Deferral of the Effective Date of Disclosures About Troubled Debt Restructurings in Update No. 2010-20</i>	Public-entity creditors that modify financing receivables within the scope of the disclosure requirements for troubled debt restructurings in ASU 2010-20. The ASU does not affect nonpublic entities.	The ASU is effective upon issuance and stayed in effect until the issuance of ASU 2011-02.
ASU 2010-29, <i>Disclosure of Supplementary Pro Forma Information for Business Combinations</i>	Public entities, as that term is defined in ASC 805, that enter into business combinations that are material individually or in the aggregate.	The ASU is effective prospectively for business combinations whose acquisition date is at or after the beginning of the first annual reporting period beginning on or after December 15, 2010. Early adoption is permitted.
ASU 2010-28, <i>When to Perform Step 2 of the Goodwill Impairment Test for Reporting Units With Zero or Negative Carrying Amounts</i>	Entities that evaluate goodwill for impairment under ASC 350-20.	<i>Public entities</i> — The ASU is effective for impairment tests performed during entities' fiscal years (and interim periods within those years) that begin after December 15, 2010. Early application will not be permitted. <i>Nonpublic entities</i> — The ASU is effective for impairment tests performed during entities' fiscal years (and interim periods within those years) that begin after December 15, 2011. Early application for nonpublic entities is permitted; nonpublic entities that elect early application will use the same effective date as that for public entities.
ASU 2010-27, <i>Fees Paid to the Federal Government by Pharmaceutical Manufacturers</i>	Entities that are required to pay the U.S. government a fee calculated on the basis of sales of qualifying branded prescription drugs to any federal government program.	The ASU is effective for calendar years beginning after December 31, 2010.
ASU 2010-26, <i>Accounting for Costs Associated With Acquiring or Renewing Insurance Contracts</i>	Insurance entities that are within the scope of ASC 944.	The ASU is effective for fiscal years, and interim periods within those fiscal years, beginning after December 15, 2011, and should be applied prospectively upon adoption. Retrospective application to all prior periods presented upon the date of adoption also is permitted, but not required. Early adoption is permitted, but only at the beginning of an entity's annual reporting period.
ASU 2010-25, <i>Reporting Loans to Participants by Defined Contribution Pension Plans</i>	Entities that issue employee benefit plan financial statements.	The ASU is effective for fiscal years ending after December 15, 2010, and should be applied retrospectively to all prior periods presented. Early adoption is permitted.

ASU 2010-24, <i>Presentation of Insurance Claims and Related Insurance Recoveries</i>	Health care organizations.	The ASU is effective for fiscal years, and interim periods within those fiscal years, beginning after December 15, 2010. A cumulative-effect adjustment should be recognized in opening retained earnings in the period of adoption if a difference exists between any liabilities and insurance receivables recorded as a result of applying the amendments in this ASU. Retrospective application and early adoption are permitted.
ASU 2010-23, <i>Measuring Charity Care for Disclosure</i>	Health care organizations.	The ASU is effective for fiscal years beginning after December 15, 2010, and should be applied retrospectively to all prior periods presented. Early adoption is permitted.
ASU 2010-20, <i>Disclosures About the Credit Quality of Financing Receivables and the Allowance for Credit Losses</i>	All entities.	<i>Public entities</i> — The disclosures as of the end of a reporting period are effective for interim and annual reporting periods ending on or after December 15, 2010. The disclosures about activity that occurs during a reporting period are effective for interim and annual reporting periods beginning on or after December 15, 2010. <i>Nonpublic entities</i> — The disclosures are effective for annual reporting periods ending on or after December 15, 2011.
ASU 2010-16, <i>Accruals for Casino Jackpot Liabilities</i>	Entities that have gaming operations within the scope of ASC 924.	The ASU is effective for interim and annual reporting periods beginning on or after December 15, 2010. Early application is permitted. A cumulative catch-up adjustment will be recorded in retained earnings as of the beginning of the period in which the ASU is adopted.
ASU 2010-15, <i>How Investments Held Through Separate Accounts Affect an Insurer's Consolidation Analysis of Those Investments</i>	Insurance companies that have a majority interest in an investment fund through interests held by the separate accounts or through a combination of interests held by the general and separate accounts.	The ASU is effective for interim and annual periods beginning after December 15, 2010, and must be applied retrospectively to all prior periods. Early application is permitted.
ASU 2010-13, <i>Effect of Denominating the Exercise Price of a Share-Based Payment Award in the Currency of the Market in Which the Underlying Equity Security Trades</i>	Entities that issue share-based payment awards with exercise prices in currencies that are different from the entity's functional currency and the payroll currency of the employees.	This ASU is effective for interim and annual periods beginning on or after December 15, 2010, and will be applied prospectively. Affected entities will be required to record a cumulative catch-up adjustment to the opening balance of retained earnings for all awards outstanding as of the beginning of the annual period in which the ASU is adopted. Earlier application is permitted.

Projects in Request-for-Comment Stage

Proposed ASU, <i>Parent's Accounting for the Cumulative Translation Adjustment Upon the Sale or Transfer of a Group of Assets That Is a Nonprofit Activity or a Business Within a Consolidated Foreign Entity</i>	All entities.	Comments due February 6, 2012.
Proposed ASU, <i>Investment Property Entities</i>	Entities that qualify as investment property entities.	Comments due February 15, 2012.
Proposed ASU, <i>Investment Companies</i>	All entities.	Comments due February 15, 2012.
Proposed ASU, <i>Principal Versus Agent Analysis</i>	All entities.	Comments due February 15, 2012.
Proposed ASU, <i>Revenue From Contracts With Customers</i>	All entities.	Comments due March 13, 2012.

AICPA

Affects

Status

Significant Adoption Dates

SAS 124, <i>Financial Statements Prepared in Accordance With a Financial Reporting Framework Generally Accepted in Another Country</i>	Auditors.	Effective for audits of financial statements for periods ending on or after December 15, 2012.
SAS 123, <i>Omnibus Statement on Auditing Standards — 2011</i>	Auditors.	Effective for audits of financial statements for periods ending on or after December 15, 2012.
SAS 122, <i>Statements on Auditing Standards: Clarification and Recodification</i>	Auditors.	Effective for audits of financial statements for periods ending on or after December 15, 2012.

<i>SAS 121, Revised Applicability of Statement on Auditing Standards No. 100, Interim Financial Information</i>	Auditors.	Effective for interim reviews of interim financial information for periods beginning after December 15, 2011. Early application is permitted.
<i>SAS 120, Required Supplementary Information</i>	Auditors.	Effective for audits of financial statements for periods beginning on or after December 15, 2010. Early application is permitted.
<i>SAS 119, Supplementary Information in Relation to the Financial Statements as a Whole</i>	Auditors.	Effective for audits of financial statements for periods beginning on or after December 15, 2010. Early application is permitted.
<i>SAS 118, Other Information in Documents Containing Audited Financial Statements</i>	Auditors.	Effective for audits of financial statements for periods beginning on or after December 15, 2010. Early application is permitted.
<i>SAS, Filings With the U.S. Securities and Exchange Commission Under the Securities Act of 1933</i>	Auditors.	Effective for filings under the Securities Act of 1933 that include audited financial statements for periods ending on or after December 15, 2012.
<i>SAS, Analytical Procedures (Redrafted)</i>	Auditors.	Effective for audits of financial statements for periods ending on or after December 15, 2012.
<i>SAS, Reports on Application of Requirements of an Applicable Financial Reporting Framework</i>	Auditors.	Effective for audits of financial statements for periods ending on or after December 15, 2012.
<i>SAS, Related Parties (Redrafted)</i>	Auditors.	Effective for audits of financial statements for periods ending on or after December 15, 2012.
<i>SAS, External Confirmations</i>	Auditors.	Effective for audits of financial statements for periods ending on or after December 15, 2012.
<i>SAS, Communicating Internal Control Related Matters Identified in an Audit</i>	Auditors.	Effective for audits of financial statements for periods ending on or after December 15, 2012.
<i>SAS, Subsequent Events and Subsequently Discovered Facts</i>	Auditors.	Effective for audits of financial statements for periods ending on or after December 15, 2012.
<i>SAS, Audit Sampling (Redrafted)</i>	Auditors.	Effective for audits of financial statements for periods ending on or after December 15, 2012.
<i>SAS, Quality Control for an Engagement Conducted in Accordance With Generally Accepted Auditing Standards</i>	Auditors.	Effective for audits of financial statements for periods ending on or after December 15, 2012.
<i>SAS, Opening Balances — Initial Audit Engagements, Including Reaudit Engagements</i>	Auditors.	Effective for audits of financial statements for periods ending on or after December 15, 2012.
<i>SAS, Terms of Engagement</i>	Auditors.	Effective for audits of financial statements for periods ending on or after December 15, 2012.
<i>SAS, Written Representations</i>	Auditors.	Effective for audits of financial statements for periods ending on or after December 15, 2012.
<i>SAS, Consideration of Fraud in a Financial Statement Audit (Redrafted)</i>	Auditors.	Effective for audits of financial statements for periods ending on or after December 15, 2012.
<i>SAS, Consideration of Omitted Procedures After the Report Release Date</i>	Auditors.	Effective for audits of financial statements for periods ending on or after December 15, 2012.
<i>SAS, Audit Considerations Relating to an Entity Using a Service Organization (Redrafted)</i>	Auditors.	Effective for audits of financial statements for periods ending on or after December 15, 2012.
<i>SAS, Consideration of Laws and Regulations in an Audit of Financial Statements (Redrafted)</i>	Auditors.	Effective for audits of financial statements for periods ending on or after December 15, 2012.
<i>SAS, The Auditor's Communication With Those Charged With Governance (Redrafted)</i>	Auditors.	Effective for audits of financial statements for periods beginning on or after December 15, 2010.
<i>SAS, Audit Documentation (Redrafted)</i>	Auditors.	Effective for audits of financial statements for periods beginning on or after December 15, 2010.

SSARS 20, <i>Revised Applicability of Statements on Standards for Accounting and Review Services</i>	Auditors.	Effective for reviews of financial statements for periods beginning after December 15, 2011. Early application is permitted.
SSAE 16, <i>Reporting on Controls at a Service Organization</i>	Service auditors.	Effective for service auditors' reports for periods ending on or after June 15, 2011. Early application is permitted.
SQCS 8, <i>A Firm's System of Quality Control (Redrafted)</i>	Auditors.	Effective for audits of financial statements for periods ending on or after January 1, 2012.
Project in Request-for-Comment Stage		
Proposed SAS, <i>The Auditor's Consideration of an Entity's Ability to Continue as a Going Concern (Redrafted)</i>	Auditors.	Comments due January 31, 2012.
SEC	Affects	Status
Significant Adoption Dates		
Final Rule, <i>Net Worth Standard for Accredited Investors</i> (33-9287)	SEC registrants.	Effective 60 days after publication in the <i>Federal Register</i> .
Final Rule, <i>Mine Safety Disclosures</i> (33-9286)	SEC registrants that are operators, or that have a subsidiary that is considered an operator, of a coal or other type of mine.	Effective 30 days after publication in the <i>Federal Register</i> .
Staff Accounting Bulletin 114	SEC registrants.	Effective March 28, 2011.
Final Rule, <i>Reporting Line for the Commission's Ethics Counsel</i> (34-65742)	SEC registrants.	Effective November 18, 2011.
Final Rule, <i>Technical Amendment to Delegation of Authority to the Director of the Division of Trading and Markets</i> (34-65628)	SEC registrants.	Effective November 2, 2011.
Final Rule, <i>Suspension of the Duty to File Reports for Classes of Asset-Backed Securities Under Section 15(d) of the Securities Exchange Act of 1934</i> (34-65148)	SEC registrants with certain ABS investments.	Effective September 22, 2011.
Final Rule, <i>Technical Amendment to Commission Procedures for Filing Applications for Orders for Exemptive Relief Under Section 36 of the Exchange Act</i> (34-64913)	SEC registrants.	Effective July 22, 2011.
Interim Final Temporary Rule, <i>Retail Foreign Exchange Transactions</i> (34-64874)	Broker-dealers registered with the SEC.	Comments due 60 days after publication in the <i>Federal Register</i> . Effective July 15, 2011.
Interim Final Temporary Rule, <i>Amendment to Rule Filing Requirements for Dually-Registered Clearing Agencies</i> (34-64832)	Clearing agencies registered with the SEC.	Effective July 15, 2011.
Order Approving Proposed Rules on Auditing Standards Related to the Auditor's Assessment of and Response to Risk and Related Amendments to PCAOB Standards (34-63606)	SEC registrants.	The amended standards are effective for audits of fiscal years beginning on or after December 15, 2010.
Final Rule, <i>Delegation of Authority to the Director of Its Division of Enforcement</i> (34-64649)	SEC registrants.	Effective June 17, 2011.
Final Rule, <i>Implementation of the Whistleblower Provisions of Section 21F of the Securities Exchange Act of 1934</i> (34-64545)	SEC registrants.	Effective August 12, 2011.
Final Rule, <i>Beneficial Ownership Reporting Requirements and Security-Based Swaps</i> (34-64628)	SEC registrants.	Effective July 16, 2011.
Final Rule, <i>Technical Amendment to Rule 19b-4: Filings With Respect to Proposed Rule Changes by Self-Regulatory Organizations</i> (34-64251)	Self-regulatory organizations.	Effective April 13, 2011.
Final Rule, <i>Amendment of Outside Employment and Activities Section of the SEC's Supplemental Standards of Ethical Conduct for Members and Employees of the Securities and Exchange Commission</i> (34-64172)	Members and employees of the SEC.	Effective May 11, 2011.
Final Rule, <i>Technical Amendments to Rule 17a-8: Financial Recordkeeping and Reporting of Currency and Foreign Transactions</i> (34-63949)	SEC registrants.	Effective March 1, 2011.

Final Rule, <i>Rules of Practice</i> (34-63723)	SEC registrants.	Effective January 24, 2011.
Final Rule, <i>Delegation of Authority to the Chief Accountant</i> (34-63699)	SEC registrants.	Effective January 18, 2011.
Final Rule, <i>Regulation SHO</i> (34-63247)	SEC registrants.	The effective date for Rule 201 (17 CFR 242.201) and Rule 200(g) (17 CFR 242.200(g)) remains March 10, 2010. The compliance date for both rules has been extended from November 10, 2010, to February 28, 2011.
Final Rule, <i>Risk Management Controls for Brokers or Dealers With Market Access</i> (34-63241)	SEC registrants.	Effective January 14, 2011.
Final Rule, <i>Adoption of Updated EDGAR Filer Manual</i> (33-9281)	SEC registrants.	Effective November 29, 2011.
Final Rule, <i>Rescission of Outdated Rules and Forms, and Amendments to Correct References</i> (33-9273)	SEC registrants.	Effective November 21, 2011.
Interim Final Temporary Rule, <i>Extension of Temporary Exemptions for Eligible Credit Default Swaps to Facilitate Operation of Central Counterparties to Clear and Settle Credit Default Swaps</i> (33-9232)	SEC registrants.	Effective July 8, 2011.
Interim Final Temporary Rule, <i>Exemptions for Security-Based Swaps</i> (33-9231)	Entities participating in security-based swap transactions.	Effective July 11, 2011.
Final Rule, <i>Facilitating Shareholder Director Nominations</i> (33-9259)	SEC registrants.	Effective September 20, 2011.
Final Rule, <i>Privacy Act of 1974: Implementation and Amendment of Exemptions</i> (PA-47)	SEC registrants.	Effective October 17, 2011.
Final Rule, <i>Amendments to Include New Applicant Types on Form ID</i> (33-9256)	SEC registrants.	Effective September 9, 2011.
Final Rule, <i>Technical Amendments to Commission Rules and Forms Related to the FASB's Accounting Standards Codification</i> (33-9250)	SEC registrants.	Effective August 12, 2011.
Final Rule, <i>Adoption of Updated EDGAR Filer Manual</i> (33-9246)	SEC registrants.	Effective August 5, 2011.
Final Rule, <i>Security Ratings</i> (33-9245)	SEC registrants.	Effective September 2, 2011, except for certain amendments that will become effective on December 31, 2012.
Final Rule, <i>Amendment to Procedures for Holding Funds in Dormant Filing Fee Accounts</i> (33-9208)	SEC registrants.	Effective May 19, 2011.
Final Rule, <i>Shareholder Approval of Executive Compensation and Golden Parachute Compensation</i> (33-9178)	SEC registrants.	Effective April 4, 2011.
Final Rule, <i>Issuer Review of Assets in Offerings of Asset-Backed Securities</i> (33-9176)	Issuers and securitizers of asset-backed securities under Regulation AB.	Effective March 28, 2011.
Final Rule, <i>Disclosure for Asset-Backed Securities Required by Section 943 of the Dodd-Frank Wall Street Reform and Consumer Protection Act</i> (33-9175)	Issuers and securitizers of asset-backed securities under Regulation AB.	Effective March 28, 2011.
Final Rule, <i>Adoption of Updated EDGAR Filer Manual</i> (33-9169)	SEC registrants.	Effective January 11, 2011.
Final Rule, <i>Extension of Filing Accommodation for Static Pool Information in Filings With Respect to Asset-Backed Securities</i> (33-9165)	SEC registrants.	Effective December 31, 2010.
Final Rule, <i>Interactive Data for Mutual Fund Risk/Return Summary</i> (33-9006)	Mutual funds.	Effective for initial registration statements and post-effective amendments that are annual updates to post-effective registration statements that become effective after January 1, 2011.

Final Rule, <i>Interactive Data to Improve Financial Reporting</i> (33-9002)	SEC registrants (other than investment companies).	Effective for domestic and foreign registrants using U.S. GAAP that have a worldwide public float of more than \$5 billion for periods ending on or after June 15, 2009. Effective for all other domestic and foreign large accelerated filers using U.S. GAAP for periods ending on or after June 15, 2010. Effective for all remaining registrants using U.S. GAAP and foreign private issuers using IFRSs as issued by the IASB for periods ending on or after June 15, 2011.
Final Rule, <i>Reporting by Investment Advisers to Private Funds and Certain Commodity Pool Operators and Commodity Trading Advisors on Form PF</i> (IA-3308)	Certain registered investment advisers.	Effective March 31, 2012.
Other Release, <i>Order Approving Adjustment for Inflation of the Dollar Amount Tests in Rule 205-3 Under the Investment Advisers Act of 1940</i> (IA-3236)	Entities subject to regulation under the Investment Advisers Act of 1940.	Effective September 19, 2011.
Final Rule, <i>Exemptions for Advisers to Venture Capital Funds, Private Fund Advisers With Less Than \$150 Million in Assets Under Management, and Foreign Private Advisers</i> (IA-3222)	Entities subject to regulation under the Investment Advisers Act of 1940.	Effective July 21, 2011.
Final Rule, <i>Rules Implementing Amendments to the Investment Advisers Act of 1940</i> (IA-3221)	Entities subject to regulation under the Investment Advisers Act of 1940.	Effective July 21, 2011, for rules regarding exemptions for venture capital fund and certain private fund advisers. All other rules effective September 19, 2011.
Final Rule, <i>Family Offices</i> (IA-3220)	Entities subject to regulation under the Investment Advisers Act of 1940.	Effective August 29, 2011.
Final Rule, <i>Temporary Rule Regarding Principal Trades With Certain Advisory Clients</i> (IA-3128)	Investment advisers registered with the SEC as broker-dealers to meet the requirements of Section 206(3) of the Investment Advisers Act when they act in a principal capacity in transactions with certain of their advisory clients.	Effective December 30, 2010. Expiration date for 17 CFR 275.206(3)-3T is extended to December 31, 2012.

Project in Request-for-Comment Stage

Proposed Rule, <i>Prohibitions and Restrictions on Proprietary Trading and Certain Interests in, and Relationships With, Hedge Funds and Private Equity Funds</i> (34-65545)	SEC registrants.	Comments due January 13, 2012.
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PCAOB	Affects	Status
Significant Adoption Dates		
Auditing Standard 15, <i>Audit Evidence</i>	Registered public accounting firms.	Effective December 15, 2010.
Auditing Standard 14, <i>Evaluating Audit Results</i>	Registered public accounting firms.	Effective December 15, 2010.
Auditing Standard 13, <i>The Auditor's Responses to the Risks of Material Misstatement</i>	Registered public accounting firms.	Effective December 15, 2010.
Auditing Standard 12, <i>Identifying and Assessing Risks of Material Misstatement</i>	Registered public accounting firms.	Effective December 15, 2010.
Auditing Standard 11, <i>Consideration of Materiality in Planning and Performing an Audit</i>	Registered public accounting firms.	Effective December 15, 2010.
Auditing Standard 10, <i>Supervision of the Audit Engagement</i>	Registered public accounting firms.	Effective December 15, 2010.
Auditing Standard 9, <i>Audit Planning</i>	Registered public accounting firms.	Effective December 15, 2010.
Auditing Standard 8, <i>Audit Risk</i>	Registered public accounting firms.	Effective December 15, 2010.

Project in Request-for-Comment Stage

Proposed Standard, <i>Improving the Transparency of Audits: Proposed Amendments to PCAOB Auditing Standards and Form 2</i>	Registered public accounting firms.	Comments due January 9, 2012.
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GASB/GAO	Affects	Status
Significant Adoption Dates		
Statement 64, <i>Derivative Instruments: Application of Hedge Accounting Termination Provisions</i>	Governmental entities.	Effective for periods beginning after June 15, 2011. Early application is encouraged.

Statement 63, <i>Financial Reporting of Deferred Outflows of Resources, Deferred Inflows of Resources, and Net Position</i>	Governmental entities.	Effective for financial statement periods beginning after December 15, 2011. Early application is encouraged.
Statement 62, <i>Codification of Accounting and Financial Reporting Guidance Contained in Pre-November 30, 1989 FASB and AICPA Pronouncements</i>	Governmental entities.	Effective for financial statements for periods beginning after December 15, 2011. Earlier application is encouraged. The provisions of this Statement generally must be applied retroactively for all periods presented.
Statement 61, <i>The Financial Reporting Entity: Omnibus</i> — an amendment of GASB Statements No. 14 and No. 34	Governmental entities.	Effective for financial statements for periods beginning after June 15, 2012. Earlier application is encouraged.
Statement 60, <i>Accounting and Financial Reporting for Service Concession Arrangements</i>	Governmental entities.	Effective for periods beginning after December 15, 2011; retrospective application is required for all prior periods presented.
Statement 57, <i>OPEB Measurements by Agent Employers and Agent Multiple-Employer Plans</i>	Governmental entities.	Provisions related to the use and reporting of the alternative measurement method are effective immediately. Provisions related to the frequency and timing of measurements are effective for actuarial valuations first used to report funded status information in other postemployment benefit plan financial statements for periods beginning after June 15, 2011. Earlier application of this Statement is encouraged.

Project in Request-for-Comment Stage

GASB Preliminary Views Document, <i>Economic Condition Reporting: Financial Projections</i>	Governmental entities.	Comments due March 16, 2012.
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FASAB	Affects	Status
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Significant Adoption Dates

Statement 41, <i>Deferral of the Effective Date of SFFAS 38, Accounting for Federal Oil and Gas Resources</i>	U.S. federal government entities.	Effective for periods beginning after September 30, 2012. Early application is encouraged.
Statement 40, <i>Definitional Changes Related to Deferred Maintenance and Repairs</i>	U.S. federal government entities.	Effective for periods beginning after September 30, 2011. Earlier application is encouraged.
Statement 38, <i>Accounting for Federal Oil and Gas Resources</i>	U.S. federal government entities.	Effective for periods beginning after September 30, 2011. Earlier application is encouraged.
Statement 37, <i>Social Insurance: Additional Requirements for Management's Discussion and Analysis and Basic Financial Statements</i>	U.S. federal government entities.	Effective beginning in fiscal year 2011.
Statement 36, <i>Reporting Comprehensive Long-Term Fiscal Projections for the U.S. Government</i>	U.S. federal government entities.	This Statement provides for a phased-in implementation, but earlier implementation is encouraged. All information will be reported as required supplementary information for the first three years of implementation (fiscal years 2010, 2011, and 2012). Beginning in fiscal year 2013, the required information will be presented as a basic financial statement, disclosures, and required supplementary information as designated within the standard.
Concepts Statement 7, <i>Measurement of the Elements of Accrual-Basis Financial Statements in Periods After Initial Recording</i>	U.S. federal government entities.	Effective upon issuance.
Technical Bulletin 2011-1, <i>Accounting for Federal Natural Resources Other Than Oil and Gas</i>	U.S. federal government entities.	Effective for periods beginning after September 30, 2013. Early application is encouraged.
Technical Release 13, <i>Implementation Guide for Estimating the Historical Cost of General Property, Plant, and Equipment</i>	U.S. federal government entities.	Effective June 1, 2011.

International Standards	Affects	Status
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Significant Adoption Dates

IAS 28 (Revised 2011), <i>Investments in Associates and Joint Ventures</i>	Entities reporting under IFRSs.	Effective prospectively for annual periods beginning on or after January 1, 2013. Earlier application is permitted.
IAS 27 (Revised 2011), <i>Separate Financial Statements</i>	Entities reporting under IFRSs.	Effective prospectively for annual periods beginning on or after January 1, 2013. Earlier application is permitted.

IFRS 13, <i>Fair Value Measurement</i>	Entities reporting under IFRSs.	Effective prospectively for annual periods beginning on or after January 1, 2013. Earlier application is permitted. The disclosure requirements do not need to be applied to comparative information provided for periods before initial application of this IFRS.
IFRS 12, <i>Disclosure of Interests in Other Entities</i>	Entities reporting under IFRSs.	Effective prospectively for annual periods beginning on or after January 1, 2013. Earlier application is permitted.
IFRS 11, <i>Joint Arrangements</i>	Entities reporting under IFRSs.	Effective prospectively for annual periods beginning on or after January 1, 2013. Earlier application is permitted.
IFRS 10, <i>Consolidated Financial Statements</i>	Entities reporting under IFRSs.	Effective prospectively for annual periods beginning on or after January 1, 2013. Earlier application is permitted.
IFRS 9, <i>Financial Instruments</i>	Entities reporting under IFRSs.	Effective for annual periods beginning on or after January 1, 2015. Earlier application is permitted.
IFRS for SMEs Q&A 2011/01, <i>Use of the IFRS for SMEs in Parent's Separate Financial Statements</i>	SMEs reporting under IFRSs.	Effective upon issuance.
<i>Improvements to IFRSs</i> — a collection of amendments to seven International Financial Reporting Standards	Entities reporting under IFRSs.	The amendments are effective for annual periods beginning on or after January 1, 2011, unless otherwise noted. Earlier application is permitted.
Amendments to IFRS 7, <i>Financial Instruments: Disclosures</i>	Entities reporting under IFRSs.	The amendments are effective for annual periods beginning on or after July 1, 2011. Earlier application is permitted.
IAS 24, <i>Related Party Disclosures</i>	Entities reporting under IFRSs.	Effective for annual periods beginning on or after January 1, 2011. Early application is permitted.
Amendments to IAS 19, <i>Employee Benefits</i>	Entities reporting under IFRSs.	Effective for annual periods beginning on or after January 1, 2013. Earlier application is permitted.
Amendments to IAS 1, <i>Presentation of Financial Statements</i>	Entities reporting under IFRSs.	Effective for fiscal years beginning on or after July 1, 2012.
IFRIC Interpretation No. 20, <i>Stripping Costs in the Production Phase of a Surface Mine</i>	Entities reporting under IFRSs.	Effective for annual periods beginning on or after January 1, 2013. Early application is permitted.
Amendments to IFRIC 14, <i>Prepayments of a Minimum Funding Requirement</i>	Entities reporting under IFRSs.	An entity should apply these amendments for annual periods beginning on or after January 1, 2011. Earlier application is permitted. If an entity applies the amendments for an earlier period, it should disclose that fact.
Project in Request-for-Comment Stage		
Exposure Draft, <i>Investment Entities</i>	Entities reporting under IFRSs.	Comments due January 5, 2012.

Appendix B: Glossary of Standards

FASB Accounting Standards Update No. 2011-12, *Deferral of the Effective Date for Amendments to the Presentation of Reclassifications of Items Out of Accumulated Other Comprehensive Income* in Accounting Standards Update No. 2011-05

FASB Accounting Standards Update No. 2011-11, *Disclosures About Offsetting Assets and Liabilities*

FASB Accounting Standards Update No. 2011-10, *Derecognition of in Substance Real Estate — a Scope Clarification* — a consensus of the FASB Emerging Issues Task Force

FASB Accounting Standards Update No. 2011-09, *Disclosures About an Employer's Participation in a Multiemployer Plan*

FASB Accounting Standards Update No. 2011-08, *Testing Goodwill for Impairment*

FASB Accounting Standards Update No. 2011-07, *Presentation and Disclosure of Patient Service Revenue, Provision for Bad Debts, and the Allowance for Doubtful Accounts for Certain Health Care Entities* — a consensus of the FASB Emerging Issues Task Force

FASB Accounting Standards Update No. 2011-06, *Fees Paid to the Federal Government by Health Insurers* — a consensus of the FASB Emerging Issues Task Force

FASB Accounting Standards Update No. 2011-05, *Presentation of Comprehensive Income*

FASB Accounting Standards Update No. 2011-04, *Amendments to Achieve Common Fair Value Measurement and Disclosure Requirements in U.S. GAAP and IFRSs*

FASB Accounting Standards Update No. 2011-03, *Reconsideration of Effective Control for Repurchase Agreements*

FASB Accounting Standards Update No. 2011-02, *A Creditor's Determination of Whether a Restructuring Is a Troubled Debt Restructuring*

FASB Accounting Standards Update No. 2010-29, *Disclosure of Supplementary Pro Forma Information for Business Combinations* — a consensus of the FASB Emerging Issues Task Force

FASB Proposed Accounting Standards Update, *Parent's Accounting for the Cumulative Translation Adjustment Upon the Sale or Transfer of a Group of Assets That Is a Nonprofit Activity or a Business Within a Consolidated Foreign Entity* — a consensus of the FASB Emerging Issues Task Force

FASB Proposed Accounting Standards Update, *Real Estate — Investment Property Entities*

FASB Proposed Accounting Standards Update, *Financial Services — Investment Companies: Amendments to the Scope, Measurement, and Disclosure Requirements*

FASB Proposed Accounting Standards Update, *Consolidation — Principal Versus Agent Analysis*

FASB Accounting Standards Codification Topic 860, *Transfers and Servicing*

FASB Accounting Standards Codification Topic 820, *Fair Value Measurement*

FASB Accounting Standards Codification Topic 805, *Business Combinations*

FASB Accounting Standards Codification Topic 250, *Accounting Changes and Error Corrections*

FASB Accounting Standards Codification Topic 220, *Comprehensive Income*

FASB Accounting Standards Codification Subtopic 810-10, *Consolidation: Overall*

FASB Accounting Standards Codification Subtopic 715-80, *Compensation — Retirement Benefits: Multiemployer Plans*

FASB Accounting Standards Codification Subtopic 450-20, *Contingencies: Loss Contingencies*

FASB Accounting Standards Codification Subtopic 360-20, *Property, Plant, and Equipment: Real Estate Sales*

EITF Issue No. 11-A, "Parent's Accounting for the Cumulative Translation Adjustment Upon the Sale or Transfer of a Group of Assets That Is a Nonprofit Activity or a Business Within a Consolidated Foreign Entity"

EITF Issue No. 10-H, "Fees Paid to the Federal Government by Health Insurers"

EITF Issue No. 10-E, "Derecognition of In Substance Real Estate"

EITF Issue No. 09-H, "Health Care Entities: Presentation of the Provision for Bad Debts and Disclosure of Net Revenue and the Allowance for Doubtful Accounts"

AICPA Statement on Auditing Standards No. 124, *Financial Statements Prepared in Accordance With a Financial Reporting Framework Generally Accepted in Another Country*

AICPA Statement on Auditing Standards No. 123, *Omnibus Statement on Auditing Standards — 2011*

AICPA Statement on Auditing Standards No. 122, *Statements on Auditing Standards: Clarification and Recodification*

AICPA Statement on Auditing Standards No. 121, *Revised Applicability of Statement on Auditing Standards No. 100, Interim Financial Information*

AICPA Statement on Auditing Standards No. 118, *Other Information in Documents Containing Audited Financial Statements*

AICPA Statement on Auditing Standards No. 117, *Compliance Audits*

AICPA Statement on Auditing Standards No. 116, *Interim Financial Information*

AICPA Statement on Auditing Standards No. 100, *Interim Financial Information*

AICPA Statement on Auditing Standards No. 70, *Service Organizations*

AICPA Statement on Auditing Standards No. 51, *Reporting on Financial Statements Prepared for Use in Other Countries*

AICPA Statement on Auditing Standards No. 37, *Filings Under Federal Securities Statutes*

AICPA Clarified Statement on Auditing Standards, *Filings With the U.S. Securities and Exchange Commission Under the Securities Act of 1933*

AICPA Professional Standards, AU Section 722, "Interim Financial Information"

AICPA Professional Standards, AR Section 90, "Review of Financial Statements"

AICPA Professional Standards, AT Section 101, "Attest Engagements"

AICPA Audit and Accounting Guide, *Health Care Entities*

AICPA Statement on Standards for Accounting and Review Services No. 20, *Revised Applicability of Statements on Standards for Accounting and Review Services*

AICPA Statement on Standards for Attestation Engagements No. 16, *Reporting on Controls at a Service Organization*

AICPA Whitepaper, *Measurement of Fair Value for Certain Transactions of Not-for-Profit Entities*

SEC Regulation S-K, Item 402(t), "Golden Parachute Compensation"

SEC Regulation S-K, Item 402(c), "Executive Compensation; Summary Compensation Table"

SEC Regulation S-K, Item 402(b), "Executive Compensation; Compensation Discussion and Analysis"

SEC Regulation S-K, Item 401, "Directors, Executive Officers, Promoters and Control Persons"

SEC Regulation S-K, Item 304, "Changes in and Disagreements With Accountants on Accounting and Financial Disclosure"

SEC Final Rule Release No. 34-64545, *Implementation of the Whistleblower Provisions of Section 21F of the Securities Exchange Act of 1934*

SEC Final Rule Release No. 33-9245, *Security Ratings*

SEC Final Rule Release No. 33-9176, *Issuer Review of Assets in Offerings of Asset-Backed Securities*

SEC Final Rule Release No. 33-9175, *Disclosure for Asset-Backed Securities Required by Section 943 of the Dodd-Frank Wall Street Reform and Consumer Protection Act*

SEC Final Rule Release No. 33-9136, *Facilitating Shareholder Director Nominations*

SEC Final Rule Release No. IA-3321, *Rules Implementing Amendments to the Investment Advisers Act of 1940*

SEC Final Rule Release No. IA-3308, *Reporting by Investment Advisers to Private Funds and Certain Commodity Pool Operators and Commodity Trading Advisors on Form PF*

SEC Release No. 34-64678, *Temporary Exemptions and Other Temporary Relief, Together With Information on Compliance Dates for New Provisions of the Securities Exchange Act of 1934 Applicable to Security-Based Swaps*

SEC Staff Paper, *Work Plan for the Consideration of Incorporating International Financial Reporting Standards Into the Financial Reporting System for U.S. Issuers*

SEC Staff Paper, *A Comparison of U.S. GAAP and IFRS*

SEC Staff Paper, *An Analysis of IFRS in Practice*

SEC Study, *Study and Recommendations on Section 404(b) of the Sarbanes-Oxley Act of 2002 for Issuers With Public Float Between \$75 and \$250 Million*

SEC Staff Legal Bulletin No. 14F, *Shareholder Proposals*

SEC Division of Corporation Finance Disclosure Guidance, *Cybersecurity*

PCAOB Staff Audit Practice Alert No. 9, *Assessing and Responding to Risk in the Current Economic Environment*

PCAOB Staff Audit Practice Alert No. 8, *Audit Risks in Certain Emerging Markets*

PCAOB Staff Audit Practice Alert No. 6, *Auditor Considerations Regarding Using the Work of Other Auditors and Engaging Assistants From Outside the Firm*

FASAB Statement No. 41, *Deferral of the Effective Date of SFFAS 38*, Accounting for Federal Oil and Gas Resources

FASAB Statement No. 40, *Definitional Changes Related to Deferred Maintenance and Repairs: Amending Statement of Federal Financial Accounting Standards 6*, Accounting for Property, Plant, and Equipment

FASAB Statement No. 38, *Accounting for Federal Oil and Gas Resources*

FASAB Statement No. 34, *The Hierarchy of Generally Accepted Accounting Principles, Including the Application of Standards Issued by the Financial Accounting Standards Board*

FASAB Statement No. 6, *Accounting for Property, Plant, and Equipment*

FASAB Statement No. 5, *Accounting for Liabilities*

FASAB Concepts Statement No. 6, *Measurement of the Elements of Accrual-Basis Financial Statements in Periods After Initial Recording*

FASAB Technical Release No. 14, *Implementation Guidance on the Accounting for the Disposal of General Property, Plant, and Equipment*

FASAB Technical Bulletin No. 2011-01, *Accounting for Federal Natural Resources Other Than Oil and Gas*

GASB Statement No. 64, *Derivative Instruments: Application of Hedge Accounting Termination Provisions* — an amendment of GASB Statement No. 53

GASB Statement No. 63, *Financial Reporting of Deferred Outflows of Resources, Deferred Inflows of Resources, and Net Position*

GASB Statement No. 34, *Basic Financial Statements — and Management's Discussion and Analysis — for State and Local Governments*

GASB Preliminary Views Document, *Economic Condition Reporting: Financial Projections*

IFRS 13, *Fair Value Measurement*

IFRS 12, *Disclosure of Interests in Other Entities*

IFRS 11, *Joint Arrangements*

IFRS 10, *Consolidated Financial Statements*

IFRS 9, *Financial Instruments*

IAS 28 (Revised 2011), *Investments in Associates and Joint Ventures*

IAS 27 (Revised 2011), *Separate Financial Statements*

IAS 19 (Revised 2011), *Employee Benefits*

IFRIC Interpretation 20, *Stripping Costs in the Production Phase of a Surface Mine*

SIC-12, *Consolidation — Special-Purpose Entities*

Appendix C: Abbreviations

ABS	asset-backed security	IAASB	International Auditing and Assurance Standards Board
AFM	Netherlands Authority for the Financial Markets	IAS	International Accounting Standard
AICPA	American Institute of Certified Public Accountants	IASB	International Accounting Standards Board
AR	U.S. Accounting and Review Services Standards	ICFR	internal control over financial reporting
ASB	Auditing Standards Board	IFRIC	International Financial Reporting Interpretations Committee
ASC	FASB Accounting Standards Codification	IFRS	International Financial Reporting Standard
ASU	FASB Accounting Standards Update	IMF	International Monetary Fund
AT	U.S. Attestation Standards	ISA	International Standard on Auditing
AU	U.S. Auditing Standards	MD&A	Management's Discussion and Analysis
C&DIs	compliance and disclosure interpretations	OCI	other comprehensive income
CAQ	Center for Audit Quality	PCAOB	Public Company Accounting Oversight Board
CD&A	compensation discussion and analysis	S&P	Standard & Poor's
ED	exposure draft	SAB	SEC Staff Accounting Bulletin
EDGAR	Electronic Data Gathering, Analysis, and Retrieval	SAG	Standing Advisory Group
EITF	Emerging Issues Task Force	SAS	Statement on Auditing Standards
EU	European Union	SEC	Securities and Exchange Commission
FAF	Financial Accounting Foundation	SIC	Standing Interpretations Committee
FAQs	frequently asked questions	SOC	service organization control
FASAB	Federal Accounting Standards Advisory Board	SSAE	Statement on Standards for Attestation Engagements
FASB	Financial Accounting Standards Board	SSARS	Statement on Standards for Accounting and Review Services
FRM	SEC Financial Reporting Manual	TDR	troubled debt restructuring
GAAP	generally accepted accounting principles	WKSI	well-known seasoned issuer
GAAS	generally accepted auditing standards	XBRL	eXtensible Business Reporting Language
GAO	Government Accountability Office		
GASB	Governmental Accounting Standards Board		

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Conclusions of the FASB, GASB, IASB, and IFRS Interpretations Committee are subject to change at future meetings and generally do not affect current accounting requirements until an official position (e.g., Accounting Standards Update or IFRS) is issued. Official positions are determined only after extensive deliberation and due process, including a formal vote.

Further information about the standard setters can be found on their respective Web sites as follows: www.fasb.org (FASB); www.fasb.org/eitf/agenda.shtml (EITF); www.aicpa.org (AICPA); www.sec.gov (SEC); www.fasab.gov (FASAB); www.gasb.org (GASB); and www.iasb.org — or on www.iasplus.com/index.htm (IASB and IFRS Interpretations Committee).

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