

**Sample Draft Letter on
AICPA “Interpretation Issue” for use by
State Associations and Individuals**

Note: States and individuals are encouraged to edit and personalize this sample draft to reflect their own views on the matters under discussion by the AICPA.

Date

Mr. Andy Mrakovcic
Manager, Audit and Attest Standards - Public Accounting
American Institute of Certified Public Accountants
1211 Avenue of the Americas
New York, NY 10036
(By email to Andy.Mrakovcic@aicpa-cima.com)

Dear Mr. Mrakovcic

Re: Request for Comments on the February 1, 2018, AICPA “Working Draft:
Health Care Entities Revenue Recognition Implementation Issue.... Issue #8-3
– Application of FASB 606, Revenue from Contracts with Customers, to
Continuing Care Retirement Community Contracts”

We are (I am) the CCRC residents united in the [Name of State Association] (a resident at [Name of CCRC], who will be directly impacted by the promulgation of the AICPA).

We paid an entrance fee relying on the marketing and contractual assurances of our provider that entrance fees were a prepayment of contractual fees that would otherwise be needed on a recurring basis to provide us with housing and other support services for the rest of our lives.

In no way was it represented to us that our entrance fee was in any way an investment transaction intended to provide at risk capital to the sponsoring provider. Our entrance fee was paid solely in partial consideration for the lifetime promises included in our continuing care contract.

We urge the accounting profession, through its trade association the AICPA, to recognize the true character of this transaction and to preserve the integrity of the entrance fee, which we paid in good faith, relying on the representations of the provider and the contract that we were given to sign.

Very truly yours,