



## New revenue standard issued

Potential challenges in the consumer products industry

The new revenue recognition standard will likely present different levels of complexity for many consumer products companies, including challenges in revenue allocation, price and contract changes, and disclosures.

### Background

The Financial Accounting Standards Board (FASB) issued Accounting Standards Update, *Revenue from Contracts with Customers* in May 2014. The standard provides companies with a single model for use in accounting for revenue arising from contracts with customers, and supersedes current revenue recognition guidance, including industry-specific revenue guidance. The core principle of the model is to recognize revenue when control of the goods or services transfers to the customer, as opposed to recognizing revenue when the risks and rewards transfer to the customer under the existing revenue guidance.

The effective date for public registrants has been deferred to 2018 for calendar year-end (annual reporting periods beginning after December 15, 2017). Early adoption as of the original effective date (2017 for calendar year-end) is permitted. The guidance permits companies to either apply the requirements retrospectively to all prior periods presented, or apply the requirements in the year of adoption, through a cumulative adjustment.

The delayed effective date and transition options are intended to allow companies a reasonable timeframe to comply. However, addressing some areas of the FASB Accounting Standards Codification may require longer lead-time, particularly related to revenue or billing systems where separation and/or allocation changes may be required, so companies should perform a preliminary analysis of the new requirements on a timely basis.

### Considerations and challenges

The requirements in the standard may present complexity for many consumer products companies. Examples of some of the challenges are as follows:

**Revenue allocation** — Under the standard, performance obligations (i.e., the unit of account under current literature) may not be consistent with current accounting policies or existing billing practices. For example, contracts to provide a combination of products, services, warranties, and sales incentives may impact revenue allocations. Companies may need to develop a systematic solution to reallocate revenue and to account for the resulting contract asset or liability. Additionally, the data to perform the calculations (e.g., standalone selling price, contract term, transaction price) may be in multiple systems and may not currently meet applicable control requirements.

**Transaction price calculations** — Total consideration that the entity expects to be entitled to from the customer over the contract term (i.e., transaction price) may need to be estimated at contract inception and throughout the contract term. Companies may need to develop methods to calculate or estimate the transaction price, including the impact of discounts, volume rebates, credits, sales returns, and sales incentives.

Under the standard, if the transaction price is subject to variability, an entity is required to estimate the transaction price using either the “expected value” or “most likely amount” approach. Companies may need to develop methods to calculate or estimate the transaction price, including the impact of variable amounts, and may also need a process to update these estimates each reporting period. It will also be important to consider data maintenance requirements relative to the transaction price.

**Warranties** — Consumer products companies often sell products with warranties assuring customers that the products will be free of defects at the time of sale and comply with agreed-upon specifications. In some cases, entities may also offer warranties that do more than simply assure the customer that the product complies with agreed-upon specifications (e.g., warranties that provide services for a fixed period after the initial warranty period has expired).

Under the new standard, the accounting treatment of the warranty (i.e., cost-accrual versus separate performance obligation) may differ depending on whether the customer has the option to purchase the warranty separately. Consumer products companies may want to reassess all warranties offered to ensure that the warranties are not providing any services beyond assuring the customer that the product complies with agreed-upon specifications.

**Rights of return** — To ensure customer satisfaction, consumer products companies often grant customers the right to return a product. The new model allows companies to recognize revenue for goods subject to a right of return if it is probable that doing so would not result in a significant revenue reversal. The standard specifically indicates that a company must separately recognize a refund liability for the amount expected to be refunded and an asset for the entity's right to recover the product from the customer subject to potential impairment.

**Sell-through approach** — Consumer products companies often enter into arrangements in which they deliver products to another party (e.g., a dealer or distributor), who then sells the product to the end customer. Under the new standard, companies will only be permitted to recognize revenue related to these

arrangements when control of the products has been transferred. Depending on the terms of the arrangement, transfer of control may occur (1) at the time of transfer to the dealer or distributor or (2) when the product is eventually sold to the end customer.

Companies will need to assess the terms of their arrangements with dealers and distributors to determine when a transfer of control occurs. This will include an assessment of indicators in addition to whether the risks and rewards of ownership have been transferred.

**Licenses** — Companies in the consumer products industry often enter into contracts to license their intellectual property (e.g., image or brand name) to others. Under the standard, companies will need to evaluate whether the license and any other promised goods or services constitute separate performance obligations. If the license is a separate performance obligation, then the entity will need to evaluate specific criteria within the standard to determine whether revenue allocated to the license should be recognized at a point in time or over time.

**Contract combinations and modifications** — The standard may require a company that enters into multiple contracts at or near the same time with the same customer to be accounted for as a single contract when the pricing or economics for those contracts are interdependent. These contracts would need to be evaluated together, in terms of determining separate performance obligations and in terms of allocating the transaction price. Also, adjustments related to contract modifications may be required. These changes may require some companies to enhance their contract management systems and tools.

**Capitalization of costs to acquire customer contracts** — The standard requires certain contract costs, including costs to acquire a contract with a customer (e.g., sales commissions), be capitalized and amortized. As a result, companies may need to develop or enhance process, controls, and systems to identify and account for such capitalized costs.

**Disclosures** — The disclosure requirements under the standard are significant and may require modification to financial and management reporting processes and

systems. Additional disclosures include, but are not limited to, disaggregation of revenue, certain information about changes in contract asset and liability balances and contract costs, and information related to the amount of the transaction price allocated to performance obligations not yet satisfied.

**Tax** — Certain tax implications may arise as taxpayers often follow the financial reporting revenue recognition methods in the determination of taxable income and transaction tax obligations. The changes may have cash tax implications, may require federal tax accounting method changes, or give rise to new tax temporary differences that may need to be captured, calculated, and tracked through tax provision processes and systems. Taxpayers who do not follow financial reporting methods for tax may also need to consider the impact of these changes on tax reporting and may need to change their computations and procedures, as well as consider potential tax method changes. Similar implications may arise in foreign jurisdictions that impose tax based upon statutory reporting maintained under either International Financial Reporting

Standards (IFRS) or U.S. Generally Accepted Accounting Principles (U.S. GAAP), as this change may impact both standards.

#### Other implications

Organizations may need to consider other project needs, including:

- Implementation of updated or new processes, controls, and systems, where required
- Determination of new monthly closing process steps to accommodate the new requirements
- Steps to estimate the impact of the new standard, to facilitate understanding and planning by other key stakeholders
- Effective training and communication of new requirements
- Effective program and resource management related to this effort

#### Getting started

Some effective first steps to consider as you begin to evaluate the implications of the potential new standard may include:

- Evaluating significant revenue streams

and key contracts to identify the specific revenue recognition changes required and the specific business units where these changes may have the greatest impact

- Addressing the longer lead-time areas where new calculation rules or revised allocation processes may be required
- Establishing a granular project plan and roadmap to manage the effort across multiple business units and countries

#### How Deloitte Advisory can help

We have an experienced team of professionals, both in the U.S. and globally across the member firms of Deloitte Touche Tohmatsu Limited, who can assist in developing an action plan to help you implement the new revenue recognition standard.

These capabilities includes the full breadth of services and competencies needed to help clients address these issues, and would include accounting assistance, help with process revisions, support in making system changes (including development of system business requirements), tax and other matters.

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