



FLORIDA GOVERNMENT FINANCE OFFICERS ASSOCIATION, INC.

Since 1937

P.O. Box 10270 • 301 South Bronough Street, Suite 300 • Tallahassee, Florida 32302-2270
Telephone: (850) 222-9684 • Fax: (850) 222-3806 • Web Page: www.fgfoa.org

2015-2016
OFFICERS

President

BARRY SKINNER, CPA, CGFO, CPFO
Deputy Director-Finance & Accounting
Orange County Comptroller's Office
(407) 836-5719
barry.skinner@occompt.com

President - Elect

SARAH KOSER, CPA, CGFO, CPFO
Deputy Finance Director
The Villages Community Development Districts
(352) 753-0421
Sarah.Koser@DistrictGov.org

Secretary - Treasurer

LINDA S. HOWARD, CPA, CTP, MBA
Finance Bureau Chief
Southwest Florida Water Management District
(321) 796-7211 ext 4122
Linda.Howard@swfwmd.state.fl.us

DIRECTORS

KIMBALL ADAMS, CPA
Director of Finance
City of Largo
(727) 587-6747
kadams@largo.com

KEN BURKE, CPA
Clerk of the Circuit Court and Comptroller
Pinellas County - CCC
(727) 464-3341
kburke@pinellascounty.org

NICOLE GASPARRI, CGFO
Organizational Program Manager
City of Boca Raton
(561) 789-8236
ngasparri@myboca.us

JONATHAN C. MCKINNEY, CGFO
Director of Finance
City of Edgewater
(386) 424-2400 ext. 1301
jmckinney@cityofedgewater.org

BINH NGUYEN, CGFO
Budget Manager
Lake County - BCC
(352) 343-9823
bnguyen@lakecountyfl.gov

SHANNON RAMSEY-CHESSMAN, CPA, CGFO
Chief Operating Officer of Finance
Clerk & Comptroller - Palm Beach County
(561) 355-4277
sramsey@mypalmbeachclerk.com

JAMIE ROBERSON, CGFO
Chief Financial Officer
Osceola County Property Appraiser
(407) 742-5172
jrob@property-appraiser.org

MARILYN D. ROSETTI, CPA
Audit Manager
Florida Auditor General - Tallahassee
(850) 412-2902
marilynrosetti@aud.state.fl.us

JEANNIE GARNER
Executive Director

November 13, 2015

David Bean, Director of Research and Technical Activities
Governmental Accounting Standards Board
401 Merritt 7
Post Office Box 5116
Norwalk, CT 06856-5116
Via email: director@gasb.org

Re: Project No. 34-3E

On behalf of the Florida Government Finance Officers Association (FGFOA), I am writing this letter to respond to the Governmental Accounting Standard Board's (GASB's) invitation to comment on the exposure draft related to Project No. 34-3E, which is an amendment of GASB Statement No. 68 (GASB 68).

We understand that the purpose of the proposed changes is to allow a governmental employer to report actual contributions as pension expense when the governmental employer is required to make contributions to a primarily non-governmental defined benefit pension plan. While we wholeheartedly support the intent of the proposed changes, we have three suggested modifications to the proposed changes.

First, in several places, the exposure draft outlines the requirements for applicability of the proposed changes, including when: (a) the pension plan is not a state or local government pension plan; (b) the plan is used to provide defined benefit pensions "to employees of employers that are not state or local governmental employers" (either individually or collectively with other state or local governmental employers that provide pensions through the pension plan); and (c) the plan has no predominant state or local governmental employer (either individually or collectively with other state or local governmental employers that provide pensions through the pension plan). We believe it would be helpful to modify the second criteria in (b) by adding the word "primarily" ahead of the phrase "to employees of employers that are not state or local governmental employers."

Second, in paragraph 11, the exposure draft requires that the proposed changes be applied retroactively by restating all prior financial statements for all prior periods presented unless such a restatement is not "practical" and to disclose the reason that such prior financial statements are not being restated. It is not clear whether materiality is allowed to be considered when deciding whether it is "practical" to restate the prior financial statements or whether materiality is a valid reason for not restating. Therefore, we suggest expanding the "if practical" phrase in paragraph 11 to "if practical and if such restatement would have a material impact on the financial statements."

Finally, in paragraph B5 and elsewhere, the exposure draft references withdrawal liability, which is generally an issue when an employer makes contributions to a multiple-employer pension plan (commonly referred to as a "Taft-Hartley" plan), and implies that the employer should include an estimate of the amount of withdrawal liability that may become due if the employer ceases to have an obligation to contribute to the plan. We suggest that paragraph B5 be expanded to make it clear that the employer is not required to obtain a withdrawal liability estimate each year, but that the employer may obtain a statement from the plan sponsor that indicates either: (a) that no withdrawal liability is expected to be due from the employer in the future; or (b) that, because the amount of withdrawal liability changes from year to year and is dependent on numerous outside factors, it is not possible to determine the amount of withdrawal liability with any degree of accuracy. Furthermore, we suggest that paragraph B5 be expanded to make it clear that, absent an estimate of the amount of withdrawal liability, the employer may simply describe the circumstances under which withdrawal liability may become due and the fact that withdrawal liability cannot be calculated as of the date of the financial statements.

We would like to thank the GASB for its efforts in preparing the ED and for the opportunity to respond. Feel free to contact me at (407) 836-5719 or barry.skinner@occompt.com.

Sincerely,



Barry Skinner, CPA, CGFO, CPFO
President