



# FLORIDA GOVERNMENT FINANCE OFFICERS ASSOCIATION, INC.

Since 1937

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Dear Sir:

The Florida Government Finance Officers Association (FGFOA) is pleased to respond to the Government Accounting Standard Board's (GASB's) Invitation to Comment on the exposure draft for *Accounting and Financial Reporting for Postemployment Benefits Other Than Pensions* (ED), which proposes guidance for reporting by governments that provide OPEB to their employees and for governments that finance OPEB for employees of other employers. These comments were prepared based on a review by the FGFOA members, its Technical Resources Committee, and the Board of Directors.

We concur that this ED improves accounting and financial reporting by state and local governments for postemployment benefits other than pensions. We understand this ED would replace the requirements of Statements No. 45, *Accounting and Financial Reporting by Employers for Postemployment Benefits Other Than Pensions*, as amended, and No. 57, *OPEB Measurements by Agent Employers and Agent Multiple-Employer Plans*.

Our reading of the ED indicates that this is a complicated topic and is written in a very technical manner, making it difficult to follow. Would it be possible to reformat the final statement to make it more user-friendly and easy to follow?

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 (386) 329-4279 or [mpickles@sjrwmd.com](mailto:mpickles@sjrwmd.com).

Sincerely,

Mary-Lou Pickles, CGFO, CMA  
President