



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

2019-2020 OFFICERS

President

KEN BURKE, CPA

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

President - Elect

JAMIE ROBERSON, CGFO

Director of Finance
City of Apopka
(407) 703-1725
jroberson@apopka.net

Secretary – Treasurer

SHANNON RAMSEY-CHESSMAN, CPA, CGFO

Chief Operating Officer
Clerk & Comptroller – Palm Beach County
(561) 355-4277
sramsey@mypalmbeachclerk.com

DIRECTORS

MELISSA BURNS

Director of Finance
City of Atlantic Beach
(904) 247-5807
mburns@coab.us

ALTON “RIP” COLVIN, CPA, CGFO, CPM

Executive Director
Justice Administrative Commission
(850) 488-2415
rip.colvin@justiceadmin.org

FRANK DIPAOLO, CPA, CGMA

Director of Finance
City of Dania Beach
(954) 924-6800
fdipaolo@daniabeachfl.gov

NICOLE GASPARRI, CGFO

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

MIKE GOMEZ, CPA

Audit Manager
Florida Auditor General - Tallahassee
(850) 412-2895
mikegomez@aud.state.fl.us

JONATHAN C. MCKINNEY, CGFO

Finance Director
City of New Smyrna Beach
(386) 410-2651
jmckinney@cityofnsb.com

WILLIAM SPINELLI, CPA

Chief Financial Officer
Brevard County Sheriff's Office
(321) 264-5206
bill.spinelli@bcso.us

KELLY STRICKLAND, CPA, CGFO

Director of Financial Administration
City of Sarasota
(941) 954-4124
kelly.strickland@sarasotagov.com

PAUL SHAMOUN
Executive Director

April 7, 2020

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. 3-38, IRC Code 457 Plans

Dear Mr. Bean:

On behalf of the Florida Government Finance Officers Association (FGFOA), we are pleased to respond to the GASB Exposure Draft on Project No. 3-38, *Certain Component Unit Criteria, and Accounting and Financial Reporting for Internal Revenue Code Section 457 Deferred Compensation Plans*. The comments below were prepared based on a review by the FGFOA members, its Technical Resources Committee, and the Board of Directors.

We generally concur with the guidance offered in the Exposure Draft and are of the opinion that it will improve financial reporting. Our review of this exposure draft revealed three areas requiring further clarification, as noted below.

- Consider clarifying when the “impose its will” criteria of GASB No. 14 paragraphs 25 and 26 might apply to an IRC Section 457 Plan that is a defined contribution plan with only employee contributions, and there is no separate governing board for the Plan.
- Consider presenting a reporting entity flowchart similar to the one in GASB No. 61 paragraph 68, that is specifically for IRC Section 457 Plans. This would help the user decide first, if the Plan is a component unit under GASB No. 61, then second (if no) whether it is a fiduciary fund under GASB No. 84.
- Consider recognizing IRC Section 457 plans that have employer contributions as being treated the same as IRC Section 401(a) defined contribution plans with employer contributions.

We would like to thank the GASB for its efforts in preparing the exposure draft, and for the opportunity to respond. Please feel free to contact me at (727) 464-3341, or kburke@mypinellasclerk.org regarding the comments above.

Sincerely,

Ken Burke, CPA
President