



May 27, 2015

David Bean
Director of Research and Technical Activities
Governmental Accounting Standards Board
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Dear Mr. Bean:

We are writing to encourage the GASB Board to consider adding a project to review GASB Statement No. 67 *Financial Reporting for Pension Plans—an amendment of GASB Statement No. 25* and GASB Statement No. 68 *Accounting and Financial Reporting for Pensions—an amendment of GASB Statement No. 27*. We are extremely concerned about the definition of *covered-employee payroll* in the two statements. Respectfully, we ask the Board to consider issuing guidance which redefines *covered-employee payroll* using the definition for *covered payroll* in GASB Statement No. 25 *Financial Reporting for Defined Benefit Pension Plans and Note Disclosures for Defined Contribution Plans*. For reference, below are the definitions of *covered-employee payroll* and *covered payroll* from the glossaries of both statements:

GASB 67 Covered-Employee Payroll: The payroll of employees that are provided with pensions through the pension plan.

GASB 25 Covered Payroll: All elements included in compensation paid to active employees on which contributions to a pension plan are based. For example, if pension contributions are calculated on base pay including overtime, covered payroll includes overtime compensation.

Although we have recently been informed by GASB staff that *covered-employee payroll* refers to gross payroll rather than pensionable payroll, the illustrations in GASB Statement No. 67 and the related implementation guide do not suggest that there is any difference between *covered-employee payroll* and *covered payroll*. Illustration 2 in GASB 67 (page 68) references employer contributions, by statute, being paid as a percentage of *covered-employee payroll*. Illustration 3 in the implementation guide also references employer contributions, by statute, being paid as a percentage of *covered-employee payroll*. Furthermore, illustration 4 in the implementation guide references the determination of the actuarially determined contribution (ADC) rate based on *covered-employee payroll*. In reality, employer

contributions and the ADC are determined based on pensionable payroll, not on *covered-employee payroll*. Since the term “*covered-employee payroll*” appears to reference the pensionable payroll used to determine contribution amounts and the ADC, those of us in the public pension plan world did not realize that the GASB meant to change the definition of *covered payroll*. What may have appeared to be a modest change to some, is problematic both from an implementation perspective and from a decision usefulness perspective.

First, *covered-employee payroll* data is not available for most public pension plans. When P2F2 informally questioned its members at a recent monthly call, they found that only 10% of the plans represented are able to fulfill the requirement to disclose the newly defined *covered-employee payroll*. Most plans do not currently receive total employee payroll amounts from their affiliated employers. Adding this additional data element, solely for required supplementary information disclosures (RSI), will increase costs for both the plans and employers. Systems currently are not structured to accept and maintain a second payroll figure from the employer. Many plans are not sure of their employer’s ability to communicate this information efficiently. Additionally, some plans believe they do not have the legal authority to request this data from their affiliated employers.

For most plans, there has never been and never will be a need to have this information, other than to fulfill this new GASB requirement. The statutes governing a pension plan define pensionable payroll and that is what is needed to be maintained by the plan in order to calculate members’ benefits and contribution amounts. Plans will have to alter database systems, alter payroll processes, re-train, communicate, audit and maintain data that they have determined to be unnecessary to manage the pension plan. The affiliated employer, or in the case of the cost-sharing multiple-employer plan, potentially thousands of employers, would also have to alter their systems to provide the data to the plans.

The new standards have placed a tremendous burden on pension plans for providing data to employers. This burden was never addressed by the standards, only the requirement that the employers have access to data that they did not have the ability to produce. The standards have added significant resource and cost burdens to plans in perpetuity. The new definition of *covered-employee payroll* will add to this burden due to the required system changes discussed previously.

Second, we question what additional information *covered-employee payroll* provides users of the plan’s financial statements over pensionable payroll, and believe the new definition will be confusing for financial statement users. As an example, contributions as a percent of *covered-employee payroll* will vary each and every year in the Schedule of Employer Contributions, even if the contribution rates remain constant. Information will be reported that leads readers to conclude that employer

contributions to the plan as a percent of payroll differs from contribution rates set in statute or recommended by the plan's actuary.

Likewise, the Actuarially Determined Contribution (ADC), employer contribution and employee contribution amounts, benefit calculations and information found in a plan's actuarial section of their CAFR are all based on pensionable payroll (*covered payroll*), not *covered-employee payroll*, so readers will see one number for "*covered payroll*" and a different number for "*covered-employee payroll*" without an explanation of why the numbers are different. It seems illogical that a payroll amount that is unrelated to the calculation of the ADC or contribution amounts would be introduced and compared with values derived from pensionable payroll in the RSI schedules, rendering those schedules misleading and confusing.

From an operational standpoint, there is no reason for plans to collect *covered-employee payroll*, and it will be expensive to do so. Given the issues outlined above, we frankly do not see any benefit resulting from the additional costs.

The reality of the current situation is that plans did not have this information for their recently published or soon to be published financial statements. It is unclear as to the difficulty employers will have in compiling this data for their upcoming financial statements, but we believe many employers are still learning of the change in definition and it will add to their already heavy burden to implement the new pension statement.

We strongly urge the GASB to change the definition of *covered-employee payroll* for purposes of GASB Statement No. 67 and 68 back to pensionable payroll.

We are available to further discuss any of the issues presented in this commentary. Thank you for your consideration of this issue.

Sincerely,

Dave DeJonge, President, Public Pension Financial Forum (P2F2)
Meredith Wilson, Executive Director, National Council on Teacher Retirement
Cindy Rougeou, President, National Association of State Retirement Administrators
Bob Eichem, President, Government Finance Officers Association
Mel Aaronson, President, National Conference on Public Employee Retirement Systems