

From: Schueler, Terry
Sent: Wednesday, October 12, 2011 10:37 PM
To: Director - GASB
Subject: New Pension Reporting Proposal

Thank you for extending the deadline for comments.

I am against the proposed changes. In Colorado, school districts contribute to PERA, run by the state. The legislature can and does change the pension rules as they please. There are differentiated defined benefit plans depending on employee's start dates and years of service. Newer employees are not eligible for the defined benefit plans, instead they participate in a contributed benefit pension plan. The District is not privy to PERA employee contribution data from other employers.

Employees may make individual choices that will impact their retirement benefits:

- 1) have the opportunity to purchased service credit which affects their retirement benefits
- 2) Have previous service credit from other employers that will impact their retirement benefits
- 3) Employees can take a 1 time payment of contributions or monthly benefits for their lifetime.
- 4) employees may take reduced benefits and assign lifetime benefits to a third party after death.

I maintain the District does not have liability for these pension benefits, rather the state of Colorado. PERA has a separate Board of Directors that makes recommendations to the legislature. The legislature can and will continue to make changes to the program to keep it viable. The school districts cannot set or change the rules. Participation in the plan is mandated for us and the rates the employer and employee contributes are set by the legislature and not the employers.

I believe continuing to report our pension contributions are the correct way to account for the PERA pension plan. Trying to determine future liabilities that the District is not personally liable for is, in my opinion, time-consuming, fictitious and less transparent than the current status.

In this time of public education funding cuts in every state of the nation, this is not the time to add unfunded mandates that do not accomplish GASB goals.

Thank you for listening.

Terry Schueler
Chief Financial Officer
St. Vrain Valley School District
395 South Pratt Parkway
Longmont, CO 80501
[\(303\) 682-7201](tel:3036827201) (Direct)