March 30, 2016

Government Accounting Standards Board
401 Merritt 7
P O Box 5116
Norwalk, CT 06856-5116
Re: Project No. 3-13E, Fiduciary Activities

Gentlemen:

   My main question is “What are you trying to achieve with this Exposure Draft?”

   We have a bunch of new GASBS relating to Pensions, and one on Component Units and, now we have an exposure draft of Fiduciary Activities, which seems to tie all of the above into one very large knot, for us small offices to try to untie in a reasonable manner.

   GASBS 67 & 68 created a wonderful filing mess for us, and we managed to get through it, and come up with something approximating the anticipated result. This wonderful result had to be included as RSI in our Financial Statements (which we did). We have a 501c (3) corporation which we duly reported as Component Unit in the statements.

   And now, for the “Hat trick,” we have to treat the Old Defined Benefit Pension Plan as a Fiduciary Fund, and as a Component Unit, which, I assume requires us to report it as GASB 67/68 in RSI and, as a Fiduciary Fund, in a separate section of the Report, and as a Component Unit in another section of the report.

   So, we now have the same piece of information reported in three places in the same report. I have to wonder how much confusion that will cause, and if even you will be happy with the subsequent outcome. I also have to wonder how many trees we will have to kill to make you happy.

Since the Old Police Pension Plan is frozen to new members (only the seven retirees make up the plan), and this type of plan is not covered by any of the pension statements so far, and there is no covered payroll to report, so the computations show strings of zeroes across multiple pages, and tells the reader absolutely nothing, which will apparently carry across to the proposed

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Fiduciary reporting as well as the Component Unit report, exactly what have we accomplished with all of this effort? I do not foresee any intelligent or intelligible data or understanding to be gained from such a reporting requirement. It is kind of like building a windmill just because there is a wind to take advantage of, but failing to consider what the windmill would be used for.

In my humble opinion, this kind of inane cross-hatching of reporting requirements does little other than require significant amounts of staff time and an increased audit cost as we try to figure out what you “Ivory Tower” denizens are trying to achieve.

I respectfully request and urge you to simply amend the relevant GASBS Statements on Pension Plans to insert the fiduciary reporting requirement into the required output of the existing schedules.

Yours truly,

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