September 21, 2017

Mr. David R. Bean
Director of Research and Technical Activities, Project No. 34-1E
Governmental Accounting Standards Board
401 Merritt 7
P.O. Box 5116
Norwalk, CT 06856-5116

Dear Mr. Bean:

We appreciate the opportunity to respond to the Governmental Accounting Standards Board’s exposure draft (ED) entitled Implementation Guide No. 201X-Z, Accounting and Financial Reporting for Postemployment Benefits Other Than Pensions (and Certain Issues Related to OPEB Plan Reporting). We appreciate the outstanding effort of the GASB staff at all levels in developing this very helpful guidance and support the ED’s adoption.

Now that OPEB liabilities may join pension liabilities on the face of the financial statements, we offer one comment regarding question 4.43. The first sentence of the response notes that OPEB liabilities are not required to be displayed separately on the face of the financial statements. This implies the liability may be combined with other liabilities, including a net pension liability. The GASB should consider providing additional guidance for preparers that combine the pension and OPEB liabilities into one line item. We suggest the response indicate that the line title should reflect each type of liability (pension and OPEB).

Sincerely,

Doug Ringler
Auditor General

cc: C. Murray, CPA, CIA

Via e-mail