

Disclaimer

The opinions and views expressed in this presentation are our own and do not necessarily represent the opinions or views of the TN Comptroller of the Treasury, his representatives, or the TN Department of Audit. Official positions are determined only after due process and deliberation.





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CMFO and CCFO Comptroller's Training Conference Local Government Update A moment about your presenter... "I understand." John M. Troyer, CPA Administrator of Standards Research and Compliance Division of Local Government Audit John. Troyer@cot.tn.gov











Peyton Manning, UT and NFL QB Super Bowl Champ 2007, 2016



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CMFO and CCFO Comptroller's Training Conference Local Government Update

"The County Commission sometimes takes the long way around the block, but they usually end up in the right place."

Bill Crisp, former Blount County Mayor



TINNINGS COMPTROMES OF THE TRANSPORT

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You may need this: Subsequent Events Latest on Hurricane Helene's impacts Asset Impairments Department of Military TEMA

Session Objectives Management Representation Letter

Discuss select issues recent GASB guidance:



Discuss other current GASB projects Technical Plan:





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Management Rep. Letter

- "What are WE signing?"
- · What are YOU signing?



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Management Rep. Letter

- "... should be signed by current management, normally including the chief executive and chief financial officers;
- e.g., the city manager or school superintendent and finance director, school district business manager, or equivalent."

Management Rep. Letter

- The "Rep Letter" is audit evidence that management understands their responsibilities and has performed their responsibilities.
 - understands



has performed





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Management Rep. Letter

A few components of the Representation Letter . . .

 "We confirm, to the best of our knowledge and belief, as of [Date of Auditor's Report], the following representations made to you during your audit."





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Management Rep. Letter

A few components of the Representation Letter . . .

 "... Our responsibility for the preparation and fair presentation of the financial statements in accordance with U.S. GAAP...."





Management Rep. Letter

A few components of the Representation Letter . . .

 "We acknowledge our responsibility for the design, implementation, and maintenance of the internal control to prevent and detect fraud."

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Management Rep. Letter

A few components of the Representation Letter . . .

 "The financial statements referred to above are fairly presented in conformity with U.S. GAAP and include all properly classified funds and other financial information . . . "

GAAPI.

Generally Accepted Accounting Principles

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Management Rep. Letter

A few components of the Representation Letter . . .

 "Adjustments or disclosures have been made for all events, including instances of noncompliance . . . "



Management Rep. Letter

Auditor's responsibilities include, "We will:

- · audit the financial statements . . .
- · conduct our audit in accordance GAAS
- · exercise professional skepticism
- · obtain an understanding of the government
- inform mgmt. of any material errors that came to our attention
- will include tests of accounting records
- · conclude based on the audit evidence



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Management Rep. Letter

Our audit will be conducted on the basis that

you acknowledge . . . your responsibility for . . .

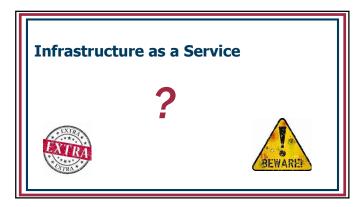
- · design, implement and maintain internal controls
- · free from material misstatement
- · with oversight of those charged with governance
- Then, we will issue a written report



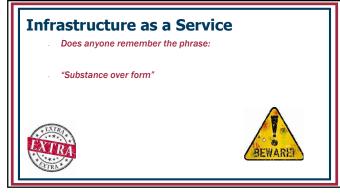
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Management Rep. Letter

?







Infrastructure as a Service

- Governmental Accounting, Auditing, and Financial Reporting (GAAFR) 26-4
- "Financial Statement preparers should exercise caution when assessing the lease term as it is possible for a lease that does not qualify as a short-term lease to nonetheless have a lease term of twelve months or less."





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Infrastructure as a Service

- Lease term is:
- Non-cancelable period PLUS;
- Period Either party or both have option (and it is reasonably certain the option will be exercised) PLUS;
- Any period either party can terminate if reasonably certain it will not be exercised.



BEWARE

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Session Objectives

➤ Discuss GASB Statement issues:

- ☐ GASBS 100 (Accounting Changes)
- ☐ GASBS 101 (Compensated Absences)
- ☐ GASBS 102 (Risk Disclosures)
- ☐ GASBS 103 (Financial Reporting)
- ☐ GASBS 104 (Intangible Asset Classifications)

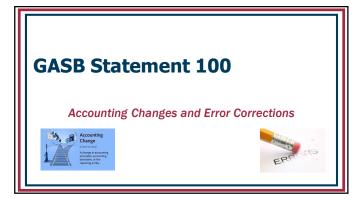


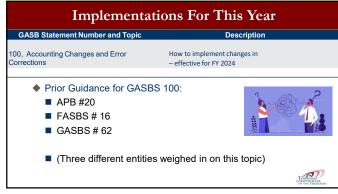


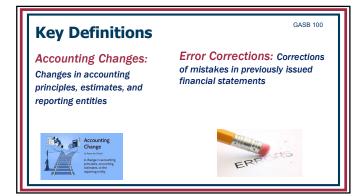


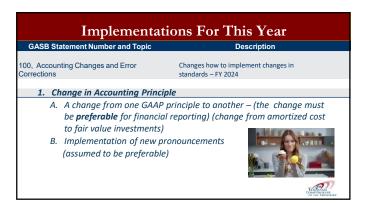


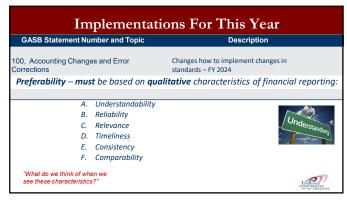






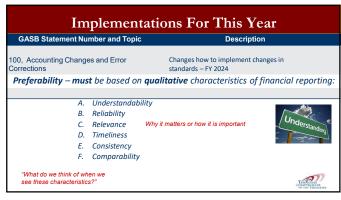


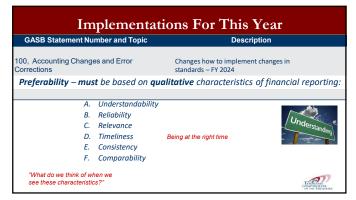


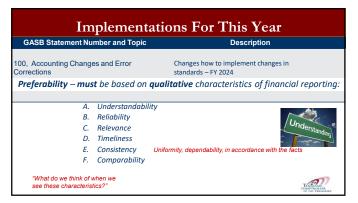


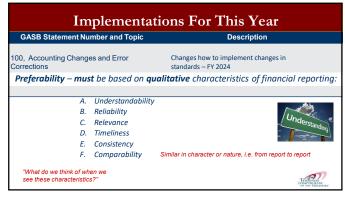


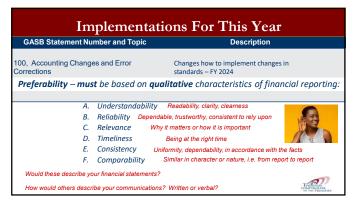


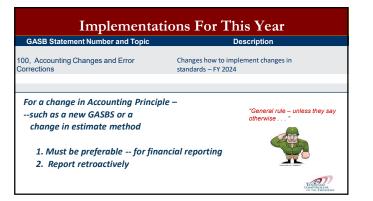


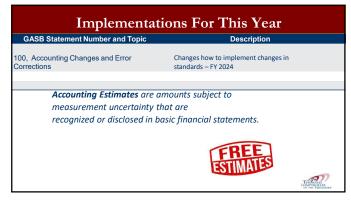


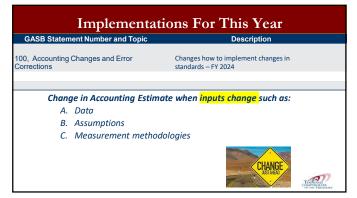


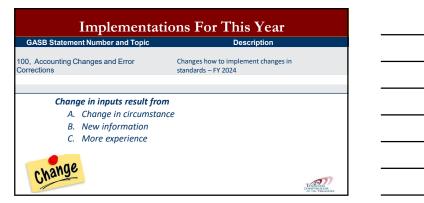




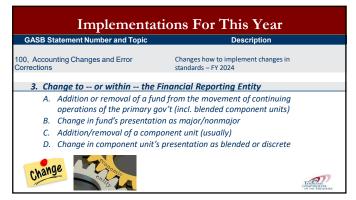






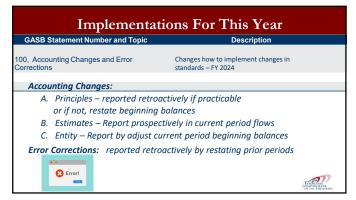


Implementations For This Year					
GASB Statement Number and Topic	Description				
100, Accounting Changes and Error Corrections	Changes how to implement changes in standards – FY 2024				
Change in measurement methodol	oav				
	ion or from years owned to miles driven)				
A. Should be justified					
B. New methodology is <mark>prefera</mark>	ble				
C. Based on qualitative charact	eristics of Change				
financial reporting	Chans				
Qualitative characteristics of financial repo	orting:				
Understandability, Reliability, Relevance, Ti	meliness, Consistency and Comparability The Control of the Contro				

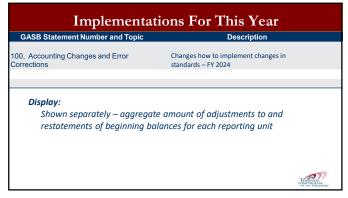


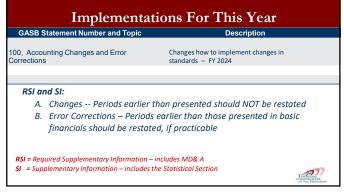


Implementations For This Year						
GASB Sta	atement Number and Topic	Description				
100, Accoun	iting Changes and Error	Changes how to implement changes in standards – FY 2024				
2. Correction of an Error –						
A.	A. Report retroactively (restate prior periods if practicable)					
В.	B. Inconvenient does NOT mean not practicable!					
C. For RSI (including MD&A) for periods presented						
			TENNESSEE COMPTROLLER OF THE TREASURY			

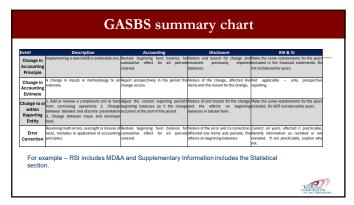


Implementations For This Year				
GASB Statement Number and Topic	Description			
100, Accounting Changes and Error Corrections	Changes how to implement changes in standards – FY 2024			
Note Disclosures include: A. Nature of the change or err B. Reason for the change				
C. Effects on beginning net pos position as applicable – pre:	sition, fund balance, or fund net sented in tabular form	Tolkhous		











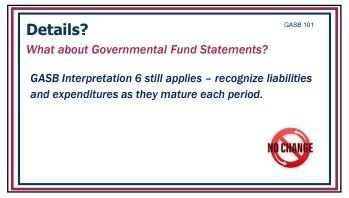


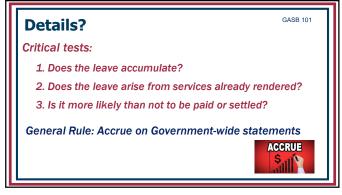




Remind me again . . . Under current guidance: traditional vacation leave is already accrued (on government wide statements), but sick leave is not – because it is dependent on future events: sickness and claiming a sick day.







Details? How should you measure the liabilities? Salary – measured at pay rates as of the date of the financial statements – unless paid out at a different rate (i.e. sick pay paid at 30%)

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Details?

GASB 101

How should you measure the liabilities?

Salary – measured at pay rates as of the date of the financial statements – unless paid out at a different rate (i.e. sick pay paid at 30%)

This simplifies the calculation in several ways:

- \succ No projections are needed for future pay increases.
- > No projections are needed for when leave is taken.
- > No present value calculations are needed.



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Details?

GASB 101

Should we include benefits?

Yes. The statement calls for "salary related payments" that are directly related to salary – like FICA and payments to defined contribution plans which are based on pay.

JT0 John Troyer, 2024-07-18T18:09:22.219



Is the calculation prescribed? No. There are some optional examples provided,

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What about vesting? Vesting can help contribute to expectations of future use, but the "more likely than not" is the criteria be used for measurement. So even if a benefit is not vested – if it is more likely than not to be used or settled, accrue.

GASB 101

What about sick leave pools?

Yes, accrue.

If leave is "more likely than not" expected to be used

Use a representative pay rate as of the financial statement date.

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What about converting or crediting to defined benefit postemployment benefits (pensions or OPEB)?

If leave is "more likely than not," expected to be converted to defined postemployment benefits, (either pension or OPEB) the Board considered that liability already appropriately measured.

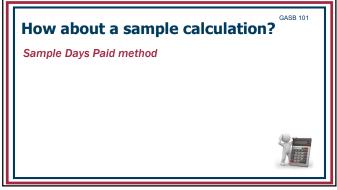
Don't double count.

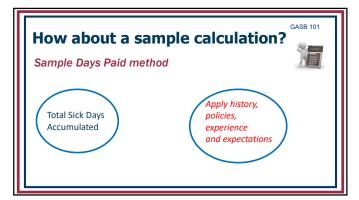
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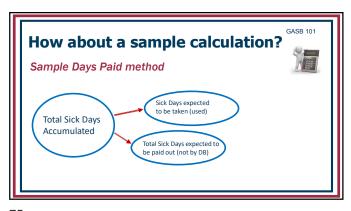
How about a sample calculation?

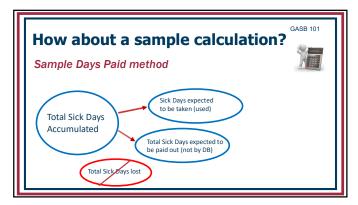
Sure. The Governmental Accounting, Auditing and Financial Reporting (GAAFR) Blue Book presents two optional methods in Chapter 28. (Days paid or Dollars paid approaches)

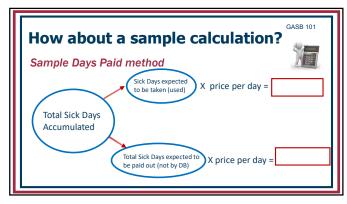
You are NOT required to use either method.

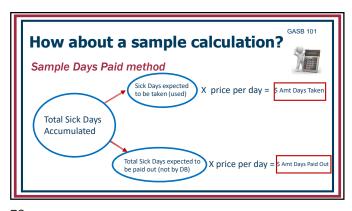


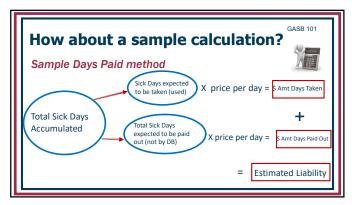


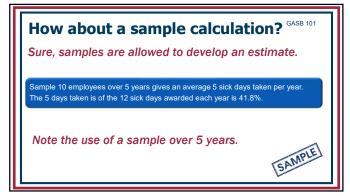












How about a sample calculation?

Start with the total sick days accumulated . . .

There are 1,644 sick days accumulated for the organization.

Use the 41.8% usage rate to expect 688 days taken and, 58.2% not taken or expect 956 days not taken.

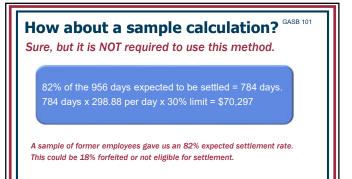
Apply the sample usage rate to the total.

How about a sample calculation? GASB 101 From a representative sample of employees
Average pay at year end is \$37.36/hr or \$298.88/ day
Use the sample average pay at year end.

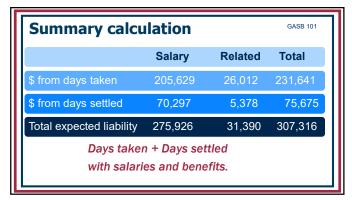
How about a sample calculation? Sure, but it is NOT required to use this method. For days expected to be taken (used) 688 days x \$298.88/day = \$205,629 Apply average pay rate per day times expected days paid.

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How about a sample calculation? Sure, but it is NOT required to use this method. 82% of the 956 days expected to be settled = 784 days. 784 days x 298.88 per day x 30% limit = \$70,297 A sample of former employees gave us an 82% expected settlement rate. Settlements are limited by policy to 30% of pay.



How about a sample calculation? Sure, but it is NOT required to use this method. Days taken has 12.65% salary related costs = \$26,012 Days settled has 7.65% salary related costs = \$5,378 Days taken applies FICA at 7.65% and DC contribution of 5.0% = 12.65% Days settled applies FICA only at 7.65% by policy.









If a raise is granted after year-end, should we update the calculation?

No, the standard says to use the pay rate at year-end.

The Board considered future COLAs would somewhat offset present value calculations, and based on a cost-benefit perspective – opted to keep it simple.

Changes to each year's estimate should be expensed to the current year.



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Are there any options?

Yes.

- You can report either increases and decreases or the net difference in amounts.
- You no longer need to report which funds will pay for the liability.
- > You can implement in FY 2024 or FY 2025.



GASR 101

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The effects of GASBS #101 information

In summary:

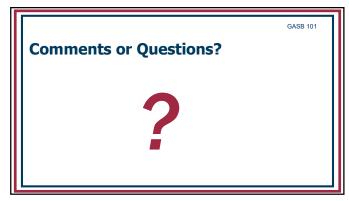
- > Better recognize liabilities as they are incurred.
- > Apply the statement to all types of absences.
- > Enhance comparability between jurisdictions
- > Achieve more robust estimates



No.
The GASB thinks a vast majority of jurisdictions can perform this calculation without the help of an actuary.

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Now what? The Accounting Department, Payroll and HR all probably have components of this calculation. Determine who will provide what – in order to perform this calculation. Follow GASBS #101 for disclosures



GASR	Statem	ant	102
UAJU	Juli		TUZ

Certain Risk Disclosures

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Future Statement Implementations GASB Statement Number and Topic Description 102, Certain Risk Disclosures Tell us more! -- FY 2025 Governments should report some concentrations and constraints. A government may be vulnerable to risks from concentrations or constraints that limit its ability to acquire resources or control spending.

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Future Statement Implementations GASB Statement Number and Topic Description 102, Certain Risk Disclosures Tell us more! -- FY 2025 Governments should report some concentrations and constraints. Concentration: A lack of diversity related to inflow or outflow of significant resources (i.e. one very large taxpayer or one industry). Constraint: A limitation imposed on a government (i.e. a tax cap, a debt cap or a spending cap).

Certain Risk Disclosures GASBS 102

- 1. Concentration or constraint is known prior to financial statements.
- 2. The concentration or constraint makes the government vulnerable to the risk of substantial impact.
 - 3. An **event** that **could cause** a substantial impact:
 - a. has occurred
 - b. has begun to occur
 - c. is more likely than not to occur within 12 months of the date of the financial statements.



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Certain Risk Disclosures GASBS 102

Disclosures should include:

- 1. The concentration or constraint
- 2. Each event that could cause a substantial impact
- 3. Actions taken by the government to mitigate risk (prior to the issuance of the financial statements)



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Certain Risk Disclosures GASBS 102

Q: What if the mitigating actions of the government are successful?

A: If the disclosure criteria is later not met, then none of the note disclosures are required.



Certain Risk Disclosures GASBS 102

 ${\it GASB stated that by implementing this standard:}$

- In general, the facts and circumstances are already known by the government
- 2. Costs are limited to the government's judgment
- 3. Information is more understandable, reliable, relevant, timely, consistent and comparable



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Questions?



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GASR 1

GASB Statement 103

Financial Reporting Model Improvements



What?

GASB 103

- Updates the MD&A
- > Defines Unusual OR Infrequent items
- > Standardizes Proprietary Fund Statements
- > Provides Major Component Unit Information
- > Presents Comparable Budgetary Information
- > Standardizes Financial Trends in the Statistical Section

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When?

GASB adopted Statement #103

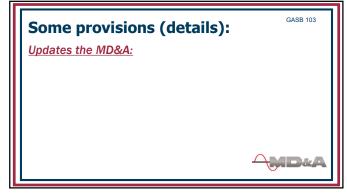
To be effective for fiscal years beginning after June 15, 2025

(year end June 30, 2026)

Earlier application is encouraged



GASB 103



Some provisions (details): Limits the MD&A to five sections: 1. Overview of the Financial Statements 2. Financial Summary 3. Detailed Analysis 4. Significant Capital Asset and LT Financing 5. Currently known facts, decisions or conditions



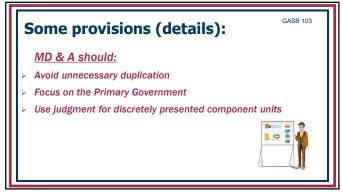
Some provisions (details): Financial Managers of Governments should be: Knowledgeable about: Transactions and Events in the report Fiscal Policies that govern operations and decision-making Conditions that may affect financial position or operations

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Some provisions (details): MD & A should be fact-based and discuss: Current-year balances and results of operations Activities with a significant positive Or negative impact Include explanations and interpretations Charts and graphs Assist users understanding Why there were changes rather presenting what changed





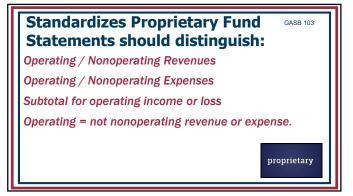
Some provisions (details): MD & A requirements (continued): Currently Known Facts, Decisions, or Conditions: Trends in relevant economic and demographic data Relevant factors used to develop the budget Expected changes in net position or fund balance Actions that will affect future periods (debt, OPEB etc.) Actions other parties have taken that will affect the gov't.



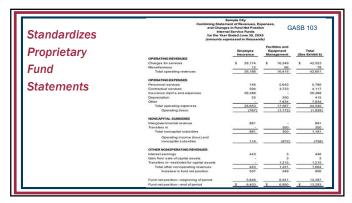


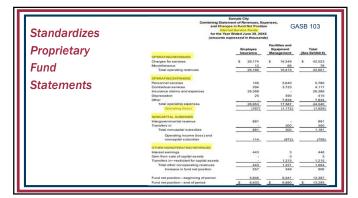
Some provisions (details): Disclose Unusual OR Infrequent items in the notes and include: 1. Program, function or identifiable activity which are related to the items (if any) 2. Whether the item is within the control of management





Standardizes Proprietary Fund Statements should distinguish: Nonoperating revenue or expense includes: Subsidies received or provided Contributions to endowments Financing transactions Disposals of inventory or capital assets Investment income and expenses





Some provisions (details): Provides Major Component Unit Information — In basic financial statements present EACH major component unit separately for statements of net position and activities (if it does not reduce the readability of statements)

Some provisions (details):

GASB 103

Provides Major Component Unit Information -

In basic financial statements present each major component unit separately

for statements of net position and activities

(if it does not reduce the readability of statements)

Otherwise, include combining statements of major component units after fund financials.

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Some provisions (continued):

GASB 103

Presents Comparable Budgetary Information



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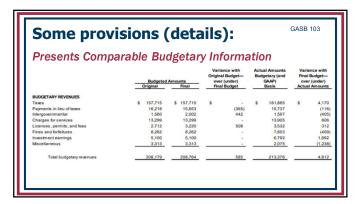
Some provisions (details):

GASB 103

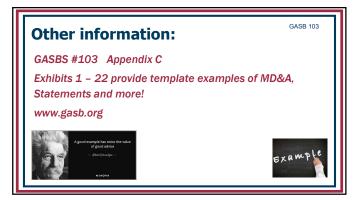
Presents Comparable Budgetary Information which includes:

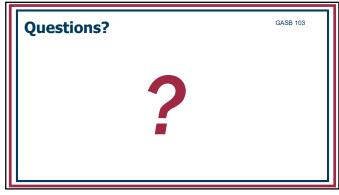
- 1. Original, Final Budget and variances
- 2. Final budget, Actual and variances
- 3. Explanation of significant variations in the notes to the RSI emphasis on "why" instead of "what"











Future GASB projects

- Going Concern Uncertainties
- Infrastructure Classification
- Severe Financial Stress
- Revenue and Expense Recognition
- Subsequent Events



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Future GASB projects Project Next Step Expected Date Going Concern Uncertainties Prelim. Views 4 Qtr 2024 Rev. and Exp. Recognition Exp. Draft 1 Qtr 2025 Severe Financial Stress Prelim. Views 4 Qtr 2024 Infrastructure Classification Final Stmt. 3 Qtr 2024 Subsequent Events Exp. Draft 4 Qtr 2024

Other GASB projects

- · Post-Implementation Review
- GAAP Structure
- Implementation Guide 2023-1



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Future GASB projects

Going Concern Uncertainties

What do we think of when we hear "Going Concern?"

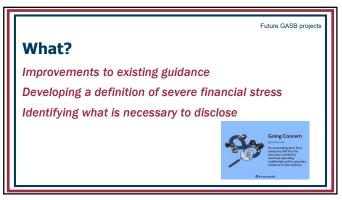
Going? ... Concerned?"

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Future GASB projects

Going Concern Uncertainties

Going Concern: the entity has the ability and willingness to continue to operate for the foreseeable future and provides an accounting basis as opposed to liquidation basis







Why?

Future GASB projects

Improvements to existing guidance -

> due to diversity in practice



> to add <u>clarity</u> to circumstances where disclosure is appropriate



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Recent activities?

Future GASB projects

Tentative decisions made:

Going Concern Uncertainty – defined as "<u>substantial doubt</u> about whether a governmental entity will continue to exist as the same legally separate entity, regardless of financial condition"



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Recent activities?

Future GASB projects

Two types of factors that should be separately identified:

- 1. Dissolution triggering event
- 2. Factors that may impact the outcome of a dissolution triggering event either to increase OR decrease the likelihood that a triggering event would ultimately end up in dissolution.



Examples of Triggering Events:

Future GASB projects

Initiation of dissolution legal proceeding by:

- 1. Citizens
- 2. A higher authority (e. g. county or state)
- 3. The government itself



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Recent activities?

Future GASB projects

Relevant factors that may lead to a potential governmental dissolution should include **all** factors that indicate a likelihood that a government may cease to exist as a legally separate entity, regardless if related to a government's financial condition"



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Recent activities?

Future GASB projects

Tentative decisions made

GASB should develop a two-step process -

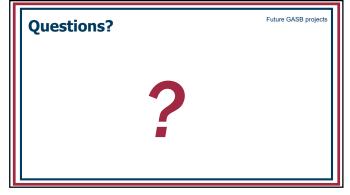
- > Guidance for Going Concern Uncertainties, then
- Guidance for Severe Financial Stress





Possible Outcomes: > Government closes down > Government merges with another government > Curtailing of services provided > Dissolution without replacement > Services are absorbed into another government

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Severe	Finan	cial	Stress
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Severe Financial Stress



What do you think of when you think of severe financial stress for a government?

Locations like:
Detroit, Michigan;
Orange County, California;
State of Illinois pension plans;
Jefferson County, Alabama;

New Orleans after Hurricane Katrina

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Severe Financial Stress

What do you think of when you think of severe financial stress for a government?

Annual budget battles?; Political brinksmanship?



What?

- > GASB is considering improvements to existing guidance
- > Developing a definition of severe financial stress
- > Identifying when and what is necessary to disclose
- > Working towards a Preliminary Views Doc.



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Recent activities?

GASB should include:

Scenarios of Severe Financial Stress:

- Not to the point of Going Concern Uncertainties
- To the point of Going Concern Uncertainties



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Recent activities?

Tentative decisions made(continued):

Severe financial stress guidance is regardless of uncertainties of its continued existence



Recent activities?

Tentative decisions made (continued):

Among the ranges of Financial stress –
this category will fit the description
"Severe Financial Distress"

DEFINITION OF THE WORD SEVERE

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Recent activities?

"Indicators" and will be used to describe the list of items used to evaluate whether a government is

"Near Insolvency"



Key Financial Indicators

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Recent activities?

Some examples of "Indicators"

- · Need to restructure debt
- Need to dispose of assets
- Recurring periods of spending exceeding revenues
- Defaults on bonds or obligations
- · Need to reduce services
- Adverse legal proceedings or legislation
- Increased short-term borrowings for operations
- Consistent working capital deficiencies
- Recurring structural budgetary imbalances

I am sure you can add to the list . . .

Recent activities?

Not to be used as examples of "Indicators"

- · Adverse key financial ratios
- Continuing negative operating cash flows
- · Proximity to debt and tax limitations
- · Denial of usual trade credit from suppliers
- Labor difficulties
- Substantial dependence on the success of a particular project or program
- · Uneconomic long-term commitments (overly burdensome)
- · Uninsured or underinsured catastrophe
- · Population decline
- Commencement of financial supervision by another government

For the Board to consider . . .

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Recent activities?

Guidance should be issued when considering the examples of indicators related to the

Timing



Relationship



Severity



For the Board to consider . .

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Recent activities?

Governments should be <u>required</u> to assess whether they meet the Severe Financial Stress condition as of the statement date.

For Tennessee governments this is June 30th. (This is NOT during the reporting period NOR as of the financial statement availability)



Recent activities?

GASB Guidance should emphasize that the eventual list of indicators are just examples of indicators and NOT a comprehensive or exhaustive list

This guidance provided by a lead-in paragraph to the examples of indicators.



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Recent activities?

The concepts of insolvency should NOT apply to reporting units less than a legally separate entity such as a fund.



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Recent activities?

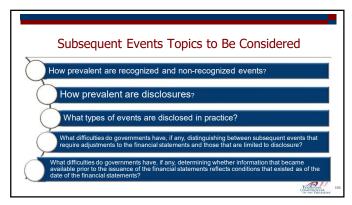
The assessment should be for the primary government AND each blended component unit separately.

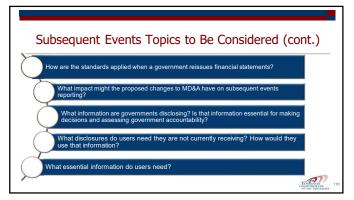


Recent activities?	
GASB will NOT explicitly require or prohibit assessments of Severe Financial Stress or Concern Uncertainty for discretely presente component units.	Going
	JUDGMENIT









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Why?

Improvements to existing guidance -

- > Confusion about existing standards
- > Challenges with applying existing standards
- > Inconsistency in practice
- > Usefulness of information provided



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Reexamination of GASBS #56 (Codification of Guidance in AICPA Statements on Auditing Standards)

Recognized event - in the financials at year-end

Non-recognized event - not booked at year-end



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How is it now?

Recognized event – suppose a major customer declares bankruptcy after June 30th – the allowance for uncollectible may need an adjustment – or a lawsuit was settled for an amount different than what was accrued – may also require an adjustment.

<u>Nonrecognized event</u> – suppose a fire or flood happens after the financial statement date. It does not change June 30th amounts, however the event may need to be disclosed in the notes.

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Recent activities?

Tentative decisions made by GASB:



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- Any new standard should be <u>broad in nature</u> and <u>more</u> <u>specific</u> than current guidance
- Principles and related terms should be developed <u>holistically</u>
- Evaluate "through the <u>date financials are available</u>" is similar to FASB literature

Recent activities?

Tentative decisions made:

- > Recognized events
- > Non-recognized events

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Recent activities?

Recognized events --

indicative of conditions as of the financial statement date (e.g. June 30th) and should be incorporated into inputs to accounting estimates as of the Financial Statement date.

If you are familiar with GASBS #56, GASB should keep the distinguishment between conditions that do and do not exist as of the F/S date.

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Nonrecognized events are identified by:

- > The event does not inform the measurement of accounting estimates financial statement date
- Has a significant effect (favorable or unfavorable) on the basic financial statements of the period in which it occurs.

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Recent activities?

Nonrecognized events (continued)

- 1. One of the following:
 - a) Debt-related transaction
 - b) Government combination or disposal
 - c) Change to entities w/i the reporting entity
 - d) New tax rate in a subsequent period OR;
- 2. Event or transaction essential to making decisions or assessing accountability

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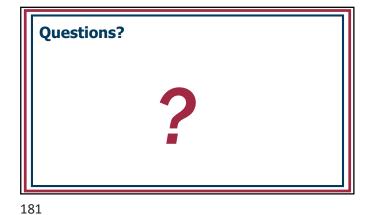
Recent activities?

Nonrecognized events – should be disclosed in the notes and include:

- 1. Description of the transaction or event(s)
- 2. An <u>estimate</u> of the effect on the financial statements

OR

a reason why an estimate cannot be made.



GAAP Structure

Hierarchy of GAAP for state and local governments.



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What?

Hierarchy of GAAP for state and local governments – was most recently established with GASBS # 76.



Quick review:

GASBS #76

Category A – GASB Statements & Codification Category B

GASB Technical Bulletins
GASB Implementation Guides

Literature of the AICPA cleared by GASB

184

Evaluate the dual approach:

Original Pronouncements and Codification have equal authoritative status.



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How?

Include a research focus on how do stakeholders engage with GASB literature.



So far?



The GASB has found, the general approach is:

- When a standard is new use the pronouncements.
- > After a standard has been in place use the codification.



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Questions?



G/SB

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Classification of Nonfinancial Assets

Board has just voted in a Final Statement GASBS # 104

Capital assets Intangible assets – leases, SBITAs & more Assets Held for Sale

The Project Includes Description of:
Capital assets
Intangible assets – leases and SBITAs
Assets Held for Sale

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Infrastructure Assets

Board Developing a Preliminary Views (PV) Document To update GASBS #34

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