



August 27, 2014

Mr. David Bean
Director of Research and Technical Activities
Governmental Accounting Standards Board
401 Merritt 7
Norwalk, CT 06856-5116

Dear Mr. Bean:

On behalf of the National Association of State Auditors, Comptrollers and Treasurers, we appreciate the opportunity to respond to the Governmental Accounting Standards Board's Exposure Draft (ED), *Financial Reporting for Postemployment Benefit Plans Other Than Pension Plans*.

We generally agree with the requirements of the ED and believe the reporting requirements will increase consistency and comparability and improve the decision usefulness of financial reports. The proposed guidance will also bring the reporting of OPEB plans in line with existing guidance for pension plans. However, we have the following specific comments that we believe the board should consider as it finalizes this statement.

Paragraph 19

In the context of this section of the proposed requirements, measurement date may be construed as financial statement period or date of actuarial valuation. We suggest a definition for measurement date be provided, or this sentence be revised to provide clearer direction.

Paragraph 59

The second sentence of the paragraph begins "If restatement is not practical." This is vague and could result in financial statement preparers not restating prior periods as required; therefore, we request that the Board add an explanation regarding what is "not practical."

Paragraph B42

The paragraph acknowledges that several disclosures that were required under Statement 43 were not carried forward to this Statement. We request that the Board consider adding references regarding which disclosures were not carried forward, or a brief description of those that were omitted.

We appreciate the opportunity to provide our comments. Should you have any questions or need additional information regarding our response, please contact Kim O'Ryan of NASACT at (859) 276-1147 or me at (217) 782-3536.

Sincerely,

William G. Holland
NASACT President