March 2, 2015

Governmental Accounting Standards Board
401 Merritt 7
PO Box 5116
Norwalk, CT 06856-5116

RE: Project 3-13P

On behalf of the nearly 22,000 members of the Pennsylvania Institute of Certified Public Accountants (PICPA) and its Committee on Local Government Accounting and Auditing, we respectfully submit the following comments on Project No. 3-13P, Financial Reporting for Fiduciary Responsibilities.

We agree with the clarification of fiduciary reporting. We also believe that including pension reporting in standalone business activities will be very beneficial and provide the users with important information. We would like more clarification on what an equivalent arrangement is or how to determine that there is an equivalent arrangement.

In the case of the agency or custodial funds, it seems that reporting inflows and outflows as part of the basic financial statement will detract from the reader’s understanding of the financials. This information is already included in a schedule with a CAFR and we feel it would be confusing as part of the basic financials.

Founded in 1897, the PICPA is the second oldest and fifth largest CPA organization in the country. Membership is comprised of CPAs in public accounting—large firms, regional firms, and sole proprietors—as well as those CPAs working in business and industry, government, and education. The PICPA mission is to further the well-being of its members while upholding the public interest by articulating positions on professional and public issues where the expertise of CPAs is relevant.

Respectfully submitted,

Cynthia Bergvall, CPA
Chair, PICPA GASB Subcommittee