

Three Proposed Accounting Standards Updates, Plan Accounting: Defined Benefit Pension Plans (Topic 360), Defined Contribution Pension Plans (Topic 962), Health and Welfare Benefit Plans (Topic 965) I. Fully Benefit-Responsive Investment Contracts, II. Plan Investment Disclosures, and III. Measurement Date Practical Expedient

Question Text	Response
* Please select the type of entity or individual responding to this feedback form.	Preparer
Other, please specify (Specified)	
* Please provide contact information for any follow-up questions.	(Filled in as Follows:)
Organization *	University of Notre Dame
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1. Should the requirements to present and disclose fully benefit-responsive investment contracts at fair value be eliminated? If not, please explain why.	Yes

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<p>2. Should the disclosure requirements for fully benefit- responsive investment contracts included in paragraphs 962-325-50-3 and 965-325-50-2 be reduced to eliminate disclosures relating to fair value measurements? If not, please explain</p>	<p>Yes</p>
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<p>why.</p>	
<p>3. Should any other disclosures be required for fully benefit-responsive investment contracts?</p>	<p>No, the proposed disclosures are sufficient and provide enough information for the reader of the Financial Statements to use in determining amounts to be received upon the initiation of withdrawals requests for this type of investment.</p>
<p>4. Should the proposed amendments be applied retrospectively to all periods presented? If not, please explain why.</p>	<p>Yes</p>
<p>5. How much time would be needed to implement the proposed amendments? Should early adoption be permitted?</p>	<p>Minimal time and effort would be required to implement the proposed amendments as the custodians of Plan assets provide valuation information at the reporting date upon which the financial statement disclosures are prepared. Early adoption should be permitted.</p>
<p>Please provide any additional comments related to I. Fully Benefit- Responsive Investment Contracts</p>	
<p>1. Should investments be disaggregated only by general type, as required under Topics 960, 962, and 965 (that is, not by both general type and nature, characteristics, and risks)? If not, please explain why.</p>	<p>Yes, there is no value-added impact for presentation of all specific investment subtypes or by sector.</p>

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<p>2. Should self- directed brokerage accounts be classified as one general type of investment? If not, please explain why.</p>	<p>Yes, from an analytical perspective, the reader of a Plan's Financial Statements and related Disclosures may deem this information important when considering the investment options included in the Plan. It also may be useful for other users of the Financial Statements when assessing Plan participants' participation in the Plan's available investment options.</p>
<p>3. Should the requirements in Topics 960, 962, and 965 to disclose investments that represent 5 percent or more of net assets available for benefits be eliminated? If not, please explain why.</p>	<p>Yes, this disclosure has always seemed to be of minor importance when considering the broader disclosures for Plan investments.</p>
<p>4. If an investment is measured using the net asset value per share (or its equivalent) practical expedient in paragraph 820-10-35-59 and that investment is in a fund that files a Form 5500 as a direct filing entity, should the disclosure of that investment's significant investment strategies be required? If so, please explain why.</p>	<p>No</p>
<p>5. Should the requirements in Topics 960, 962, and 965 to disclose the net appreciation or depreciation for investments by general type be</p>	<p>Yes</p>

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<p>eliminated? If not, please explain why.</p>	
<p>6. Should the proposed amendments be applied retrospectively? If not, please explain why.</p>	<p>Yes</p>
<p>7. How much time would be needed to implement the proposed amendments? Should early adoption be permitted?</p>	<p>Minimal time would be needed to implement the proposed amendments, so perhaps a year would be sufficient to compensate for those Plans for which Financial Statements have already been issued and Form 5500 filings have been completed. Early adoption should be permitted.</p>
<p>8. Are there any other improvements applicable to employee benefit plan accounting that should be considered for purposes of further simplifying financial reporting for employee benefit plans (for example, are there other disclosures that should be eliminated, amended, or added)?</p>	<p>None noted</p>
<p>Please provide any additional comments related to II. Plan Investment Disclosures:</p>	
<p>1. Should employee benefit plans be allowed to apply a measurement date practical expedient to measure</p>	<p>Yes, this seems like a very reasonable accommodation.</p>

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<p>investments and investment-related accounts using the month-end that is closest to the plan's fiscal year-end when the fiscal period does not coincide with a month-end? If not, please explain why.</p>	
<p>2. Should plans only disclose (rather than recognize) contributions, distributions, and significant events that occur between the alternative measurement date and the plan's fiscal year-end? If not, please explain why.</p>	<p>Yes, if recognition were required then there would presumably be no need for the practical expedient.</p>
<p>3. Should any other disclosures be required for plans that elect the practical expedient?</p>	<p>No, other than those enumerated in the proposal.</p>
<p>4. Should the proposed amendments be applied prospectively? If not, please explain why, and what transition method you would propose.</p>	<p>Yes</p>
<p>5. How much time would be needed to implement the</p>	<p>It would seem a one year implementation period would be reasonable. Early adoption should be permitted.</p>

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<p>proposed amendments? Should early adoption be permitted?</p>	
<p>Please provide any additional comments related to III. Measurement Date Practical Expedient:</p>	
<p>Please provide any comments on the electronic feedback process:</p>	
<p>Below is a printable summary of your responses to the questions in this feedback form.</p> <p>You can revise your responses by clicking the "Back" button.</p> <p>All comments received constitute part of the FASB's public file. The FASB will make all comments publicly available by posting them to the Online Comment Letters portion of its website.</p> <p>If you are finished providing comments, click the 'Submit' button at the bottom of this page.</p>	<p>Not Answered</p>