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Technical Director
File Reference Nos. EITF-15C – I, EITF-15C – II, and EITF-15C – III
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Plan Accounting: Defined Benefit Pension Plans (Topic 960) Defined Contribution Pension Plans (Topic 962) Health and Welfare Benefit Plans (Topic 965)

I. Fully Benefit-Responsive Investment Contracts File Reference No. EITF-15C – I

The Accounting Principles and Assurance Services Committee (the "Committee") of the California Society of Certified Public Accountants ("CalCPA") respectfully submits its comments on the referenced proposal. The Committee is the senior technical committee of CalCPA. CalCPA has approximately 40,000 members. The Committee consists of 53 members, of whom 47 percent are from local or regional CPA firms, 27 percent are from large multi-office CPA firms, 12 percent are sole practitioners in public practice, 10 percent are in academia and 4 percent are in international CPA firms. Members of the Committee are with CPA firms serving a large number of public and nonpublic business entities, as well as many non-business entities such as not-for-profits, pension plans and governmental organizations.

The committee appreciates the opportunity to respond on Topics 960, 962, and 965 as follows:

Question 1: Should the requirements to present and disclose fully benefit-responsive investment contracts at fair value be eliminated? If not, please explain why.

Yes, the Committee agrees that the relevant measure to key stakeholders is contract value and fair value does not add significant useful information.

Question 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 why.

Yes, the Committee agrees.

Question 3: Should any other disclosures be required for fully benefit-responsive investment contracts?

No, the Committee believes the disclosures in Topic 962-325-50-3 and 965-325-50-2 as proposed, are adequate.

Question 4: Should the proposed amendments be applied retrospectively to all periods presented? If not, please explain why.

Yes, the Committee believes this provides consistency among periods presented.

Question 5: How much time would be needed to implement the proposed amendments? Should early adoption be permitted?

The Committee believes the time required would be minimal.

II. Plan Investment Disclosures
File Reference No. EITF-15C – II

Question 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.

Yes, the Committee agrees that segregation by general type provides sufficient information for stakeholders in general purpose financial statements and, although the information by nature of risk is relevant, the costs of its preparation outweigh its benefits.

Question 2: Should self-directed brokerage accounts be classified as one general type of investment? If not, please explain why.

Yes, the Committee believes that self-directed brokerage accounts have a similar characteristics in that such information is available to participants outside of the general purpose financial statements.

Question 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.

Yes, the Committee agrees that other disclosures required by Topics 960, 962 and 965 are sufficient and the benefits of including separately the information for investments representing more than 5 percent of net assets do not outweigh the costs of preparation and is duplicated by the supplemental data required by the Department of Labor.

Question 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.

No, the Committee believes that disclosure of that investment's significant investment strategies should not be required.

Question 5: Should the requirements in Topics 960, 962, and 965 to disclose the net appreciation or depreciation for investments by general type be eliminated? If not, please explain why.

Yes, the Committee agrees that the benefits of this information do not outweigh the costs of preparation.

Question 6: Should the proposed amendments be applied retrospectively? If not, please explain why.

Yes, the Committee agrees that retrospective treatment is necessary to maintain consistency among periods presented.

Question 7: How much time would be needed to implement the proposed amendments? Should early adoption be permitted?

The Committee believes that the time to implement the proposed ASU would not be significant.

Question 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)?

The Committee has no further suggestions.

III. Measurement Date Practical Expedient
File Reference No. EITF-15C – III

Question 1: Should employee benefit plans be allowed to apply a measurement date practical expedient to measure 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.

Yes, the Committee agrees with this practical expedient.

Question 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.

Yes, the Committee agrees that disclosure is adequate for this short period.

Question 3: Should any other disclosures be required for plans that elect the practical expedient?

No, the Committee does not believe any other disclosures are required.

Question 4: Should the proposed amendments be applied prospectively? If not, please explain why, and what transition method you would propose.

Yes, the Committee believes prospective transition is appropriate.

Question 5: How much time would be needed to implement the proposed amendments? Should early adoption be permitted?

The Committee believes that time to implement the proposal would not be significant and that early adoption should be permitted.

We thank you for the opportunity to comment on this matter. We would be glad to discuss our opinions with you further should you have any questions or require additional information.

Sincerely,

A.J. Major III
Chair
Accounting Principles and Assurance Services Committee
California Society of Certified Public Accountants