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THE RETIREMENT SYSTEMS OF ALABAMA

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June 4, 2015

ERS Participating Employers:

The reporting requirements for the plan vs. the employer are significant with respect to the total pension liability, deferred outflows of resources, deferred inflows of resources, pension expense, and the employer's specific interest in the plan's fiduciary net position. In May 2014, the AICPA SLGEP issued a whitepaper, "Governmental Employer Participation in Agent Multiple-Employer Plans: Issues Related to Information for Employer Reporting" which raises several concerns and offers best practice solutions to overcoming these concerns. The whitepaper point out that:

- a.) The financial statements of agent plans do not include the specific pension amounts required to be reported by participating employers and these employers do not have direct access to the underlying plan records and data supporting such amounts; and
- b.) The plan financial statements do not disclose actuarial information for each individual employer or the plan as a whole.

The AICPA SLGEP has recommended certain best practice solutions for plans and their auditors to assist employers and their auditors in overcoming the above challenges they will face when implementing GASB Statement No. 68.

The first best practice solution relates to the total pension liability, deferred outflows of resources, deferred inflows of resources, and pension expense. The AICPA SLGEP has recommended the following:

- The plan actuary issue a separate actuarial valuation report specific to each employer which includes an actuarial certification letter addressed to employer management; and
- The plan engage its auditor to issue either:
 - Option 1: A service organization controls 1 (SOC 1) Type 2 report on controls over census data maintained by the plan, or
 - Option 2: An examination engagement over selected management's assertions related to census data maintained by the plan.

The Employees' Retirement System (ERS) has addressed this best practice by instructing our actuary to issue a separate actuarial valuation report specific to each of our participating employers. This actuarial certification letter will be addressed to employer management and can be found at www.rsa-al.gov.

The ERS engaged an independent firm to provide a SOC 1 Type 2 report on the controls over census data maintained by us (Option 1, above). Total pension liability and contributions revenue and receivable are dependent on the completeness and accuracy of census data. As such, processes and controls over census data for active employees, inactive employees and retirees are critical. The ERS has designed and implemented a strong process of internal controls over the census data of our members. The SOC 1 Type 2 report states that our controls were operating effectively. This report, for the period January 1, 2014 – September 30, 2014, can be found at www.rsa-al.gov. RSA's auditors obtained an understanding of the processes and controls we have in place over census data as part of the risk assessment they used in their audit.

In addition, the ERS provides its employers with an annual checklist which details the active members' name, social security number, service and contributions for the annual period under review. This annual checklist serves as a verification of the completeness and accuracy of active census data on record with the ERS and serves as a means by which employers and their auditors can verify this information.

The second best practice solution relates to the challenges faced by employers in determining their specific fiduciary net position amounts. The AICPA SLGEP has recommended the following:

- The plan prepare a schedule of changes in fiduciary net position by employer and related notes to the schedule; and
- The plan engage its auditor to opine on the schedule of fiduciary net position by employer either through:
 - Option 1: An opinion on the schedule as a whole combined with a SOC 1 Type 2 report on the controls over the calculation and allocation of additions and deductions to employer accounts, or
 - Option 2: An opinion on each employer column or row in the schedule.

The ERS has addressed this best practice by preparing the schedule of changes in fiduciary net position by employer and related notes described above, and obtaining an opinion on the schedule as a whole combined with a SOC 1 Type 2 report on the controls over the calculation and allocation of additions and deductions to employer accounts (Option 1). The audited schedule and related SOC 1 Type 2 report can be found at www.rsa-al.gov.

Included in this packet are the following reports which were prepared in order to assist the Plan's participating employers in implementing GASB 68 and 71. These reports also illustrate that the ultimate responsibility of any unfunded liability is the participating employer and not the Plan:

- GASB 68 Report prepared by the plan's actuary: Cavanaugh Macdonald Consulting, LLC
- Schedule of Changes in Fiduciary Net Position by Employer (specified element report) with independent auditors' report by Carr, Riggs & Ingram, LLC
- SOC 1 Type 2 report with report by A-Lign CPA's

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- Draft Note Disclosures and RSI in form of illustration 2 from GASB 68
- <u>Employer specific valuation information</u> including actuarial certification letter and journal entries prepared by Cavanaugh Macdonald Consulting, LLC

We hope that this information helps you to implement GASB 68 and 71. Please provide all of this information to your auditors as they will also need it during their audit work.

Sincerely,

Diane E. Scott, CPA, CGMA Chief Financial Officer

Retirement Systems of Alabama