Date: June 16, 2017

To: Districts using Fund 73 for OPEB

From:  Gene Fornecker, School Finance Auditor

 School Financial Services Team

Subject: Fund 73 OPEB trust reminders

This document provides guidance for districts using a Fund 73 OPEB trust. Changes related to the adoption of GASB 74 and 75 have been included for those districts with actuarial studies updated to include the new requirements. One of the most notable changes included as part of the GASB statements is the term Actuarially-Determined Contribution (ADC). This is similar to the Annual Required Contribution (ARC) which was part of the prior pronouncements. The ADC will only be computed and be part of actuarial studies for those districts that have Fund 73 trusts established. References in this communication will be made to both the ADC and ARC since not all actuarial studies have been updated to reflect the new accounting standards.

Updated documents on the [Benefit Trust Fund](http://dpi.wi.gov/sfs/finances/fund-info/employee-benefit-trust-fund) site include:

* Updated Excel worksheet to determine special education 2016-17 categorical aid eligibility based on 2015-16 costs.
1. **Sample of Activity Updated July 2014 - Retiree Payments Directly to Insurance Vendor**

The implicit rate subsidy is calculated based on the amount of premiums the district’s health insurance or long term care insurance vendor receives on behalf of the retirees, however funded. This includes both money the vendor receives from the trust, district or retiree. If a retiree pays the insurance company directly for their portion of the premium (self-pay), the district should still include that amount in the implicit rate subsidy calculation. The district may need to contact the insurance vendor in order to obtain the self-pay amounts.

Districts should use the updated calculation in the Sample of Activity to calculate the implicit rate subsidy for 2016-17. On Exhibit A, #2, the yellow boxes were separated for retiree portion remitted to the trust and retiree portion paid directly to insurance vendor by retiree (self-pay). To accurately reflect the retiree amounts throughout the Sample of Activity workbook, there are now 6 yellow boxes under #2 instead of 4.  The self-pay amount is included on the Sample of Activity only for the calculation of the actual implicit rate subsidy and is not included in any of the entries throughout the workbook.

1. **Implicit Rate Subsidy Payback - Does your district need to do it?**

The implicit rate subsidy payback is an expenditure of the trust if retirees remain on the district’s health insurance or long term care insurance plans unless the district has one of the following exceptions, which have no impact on the premium paid by active employees. The implicit rate subsidy payback applies unless the district:

1. Is self funded and the trust pays actual medical costs;

2. Has retiree plans and active employee plans rated separately, and active employee rates do not subsidize the retiree rates; or

3. Is immaterial (as determined by the actuary).

1. **Implicit Rate Subsidy Payback - Expenditure Object Code 994 in Fund 73**

Districts should account for the implicit rate subsidy payment from the trust to the district using object 994. This object was new in 2012-13 and is required to be used in 2016-17 when making the implicit rate subsidy payback.

1. **Allocation Requirement - Contribution and Implicit Rate Subsidy Payback**

The contribution into the trust, up to the ARC/ADC amount, should be allocated to the fund, function, project and object 218 of all active employee plan members. Amounts in excess of the ARC/ADC should be coded to function 292000, object 218. The implicit rate subsidy payment received by the district is a credit to active employee plan member’s health care costs. The implicit rate subsidy should be allocated to the fund, function, project and object 241 of all active employee plan members with health insurance.

1. **Budget Requirement and PI-1202 - Contribution and Implicit Rate Subsidy Payback**

All activity relating to the trust needs to be budgeted. This includes the contribution and the implicit rate subsidy payback. These amounts must also be included as benefits to the active employees on the PI-1202 staffing report.

1. **Fund 73 Contribution in 2016-17 “DUE” July 28, 2017**

This is a reminder that the 2016-17 physical cash contribution to the Fund 73 Employee Benefit Trust must be made by July 30, 2017 in order to be counted as expenditure for 2016-17 (FY 17). Any contributions *after* July 30, 2017 will be considered a cost for 2017-18 (FY 18). Since July 30, 2017 is on a Sunday any deposits into Fund 73 bank accounts will have to be posted by the end of the business day on Friday July 28, 2017.

1. **Cash Movement and District Transactions**

All transactions relating to the Fund 73 trust should have actual physical cash movement involved. There should be no netting of activity with journal entries. Cash for the full contribution should be transferred to the trust, cash for the full implicit rate subsidy payback should be transferred to the district, and if the trust reimburses the district for retiree expenditures throughout the year, the full amount of reimbursement should be transferred. If there is a retiree paid portion that is deposited into Fund 10, this amount should also have full cash movement into the trust. If the district (Fund 10) pays or receives cash relating to the trust, it should be set up as a Due From Fund 73 or Due to Fund 73 upon payment to the vendor or receipt of the retiree portion. The retiree transactions should never be recorded as an expenditure or revenue in Fund 10.

1. **Special Education Categorical Aid Eligibility Worksheet**

The Special Education Categorical Aid Eligibility Worksheet has been updated for 2016-17 and includes 2015-16 data. The worksheet can be found on the Benefit Trust Fund page on the SFS website.

1. **New Actuarial Studies - Send to DPI**

If your district is due for a new study for 2016-17, please send Gene Fornecker a copy of the study when it is completed. If your district has not yet started the process for the new study that is required for 2016-17, please contact your actuary right away so your new study will be available for your audit.

1. **Fund 73 Fair Market Value at the End of the Year**

Unrealized gains and losses are typically not recorded for DPI purposes. Starting with the fiscal year ending June 30, 2014, both realized and unrealized activity should be accounted for in Fund 73. The investment balance in the PI-1505 should reflect the market value of the investment. Source 957 was added for Unrealized Gains on Investments and Object 998 for Unrealized Losses on Investments.

Please contact Gene Fornecker at (608) 267-7882 or eugene.fornecker@dpi.wi.gov with any questions regarding this information.