GASB Statement 72

Fair Value Measurement and Application

Overview

- What: The GASB issued Statement 72 to update the existing standards on fair value (primarily Statement 31)
- Why: Review of existing standards found opportunities to improve the measurement of resources available to governments, and to increase comparability and accountability
- When: Effective for fiscal years beginning after June 15, 2015

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Fair Value Definition

- The price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date.
 - -An exit price
- Other characteristics of fair value
 - -Market-based
 - Based on a government's principal or most advantageous market
- Fair value is not an option it is required

Valuation Techniques

- Apply valuation technique(s) that best represents fair value in the circumstances
 - Market approach Using prices and other relevant information generated by market transactions involving identical or similar assets or liabilities
 - Cost approach Amount that would be required currently to replace the service capacity of an asset
 - Income approach Converts expected future amounts (for example, cash flows) to a single current amount (that is, discounted)

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 Revisions due to a change in valuation technique(s) are considered a change in accounting estimate

Inputs

- Maximize use of relevant observable inputs and minimize use of unobservable inputs
- Inputs should be consistent with the characteristics of the asset or liability
- Based on bid and ask prices
- Level 1: quoted prices (unadjusted) in active markets for identical assets or liabilities, most reliable
- Level 2: quoted prices for similar assets or liabilities, quoted prices for identical or similar assets or liabilities in markets that are not active, or other than quoted prices that are observable
- Level 3: unobservable inputs, least reliable

Measurement—Net Asset Value Per Share (NAV)

- Measuring fair value of investments in certain entities that calculate net asset value (NAV) per share or its equivalent
- NAV per share may be used as a practical expedient to estimate fair value
 - Adjustment to NAV per share amount may be necessary to be consistent with measurement principles
 - May be applied on an investment-by-investment basis but must be applied consistently to fair value measurement of the government's entire position in a particular investment
- If sale of a portion of an investment at an amount different from net asset value per share is probable, the practical expedient may not be applied

Investment Definition

- A security or other asset that a government holds primarily for the purpose of income or profit and with a present service capacity that is based solely on its ability to generate cash or to be sold to generate cash
 - Service capacity refers to a government's mission to provide services
 - Held primarily for income or profit—acquired first and foremost for future income and profit

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Fair Value Application

- Assets that meet the definition of an investment generally should be measured at fair value
 - Alternative investments
 - Equity securities, stock warrants, and stock rights that do not have readily determinable fair values – provided such investment-types are not reported according to the equity method
 - Commingled investment pools that are not government-sponsored
 - Invested securities lending collateral
 - Intangible assets
 - Land and land rights
 - Real estate
 - Lending assets
 - Natural resource assets

Investments Not Reported at Fair Value

- Money market investments and participating interest-earning investment contracts that have a remaining maturity at time of purchase of one year or less, reported by governments other than external investment pools
- Investments in 2a7-like pools
 Investments in life insurance
- Investments in life insurance investments in life settlement contracts, however, should be at fair value
- Investments in common stock that meet the criteria for applying the equity method
- Non-participating interest-earning investment contracts
 Unallocated insurance contracts
- Unallocated insurance contracts
 Synthetic guaranteed investment contracts that are fully benefit
- responsive

Application of Acquisition Value

- Acquisition value (an entry price) replaces fair value for the following:
 - Donated capital assets
 - Donated works of art, historical treasures, and similar assets
 - Capital assets acquired through a nonexchange transaction
 - Capital assets received through a service concession arrangement

Disclosures

- The following information for each class or type of assets and/or liabilities measured at fair value should be disclosed:
 - The fair value measurement at the end of the reporting period and for nonrecurring fair value measurements, the reasons for the measurement
 - The level of the fair value hierarchy within which the fair value measurements are categorized in their entirety (Level 1, 2, or 3)
 - A description of the valuation technique(s)

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Level 3 and NAV

- For fair value measurements categorized within Level 3 of the fair value hierarchy
 - The effect of those investments on investment income for the reporting period
- Disclosures for investments in certain entities that calculate NAV per share (or its equivalent)
 - Information that helps users of its financial statements to understand the nature and risks of the investments
 - Information on whether the investments are probable of being sold at amounts different from net asset value per share (or its equivalent)

GASB Exposure Draft

Accounting and Financial Reporting for Certain External Investment Pools

External Investment Pools

- What: The GASB is considering revisions to the accounting and financial reporting standards for 2a7-like investment pools
- Why: Securities and Exchange Commission changes to Rule 2a7 would make it difficult for external investment pools to meet the criteria to report as 2a7-like
- When: Exposure Draft issued June 2015

Background

- Current standards allow pools that are considered to be 2a7-like to report investments at amortized cost rather than fair value The SEC recently made significant changes to Rule 2a7 •
- The SEC recently made significant changes to Rule 2a7 Concerns were raised regarding the cost-benefit of government pools applying the revised Rule 2a7 provisions The project is considering criteria independent of Rule 2a7 that could be applied by external investment pools to determine when a cost-basis can be applied to investments. The current 2a7 provisions and other regulatory provisions are being used as starting point. This project would not apply to the NCCMT Cash (Government) Portfolio and the NCCMT Term Portfolio
- The Term Portfolio is registered with the SEC and is a bond fund
 - The Cash Portfolio is registered with the SEC not currently affected by the GASB's proposed changes would have to de-register to benefit from any changes

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Proposal Summary

- GASB separated accounting and financial reporting from SEC requirements
- ED driven by amortized cost approximating fair value
- Patterned after 2010 SEC regulations for 2a7 funds
- Some of the 2010 regulations were excluded (e.g., stress testing) if they were operational in nature
- Significant instances of noncompliance would require a switch to fair value accounting
 - Professional judgment required
 - Significant means material
 - Switch back to amortized cost possible in future periods

Tentative Criteria Categories

- Pool should transact with participants at a stable net asset value (NAV) – if NAV floats an external investment pool should use fair value
- · Portfolio maturity limits
- · Portfolio quality requirements
- · Portfolio diversification requirements
- · Portfolio liquidity limits
- · Shadow pricing requirements

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Proposed Implementation

- FY ending after 6/15/15 except for shadow pricing and credit quality requirements which would be implemented for FY ending after 12/15/15
- External pools choosing to report at fair value after implementation would never be allowed to revert back to amortized cost
- External pools not qualifying for amortized cost in some years might be allowed to use amortized cost in future years under certain circumstances
- External pools using amortized cost would be allowed to switch to fair value in future years

Financial Reporting Model Review

Financial Reporting Model Review

- · GASB 34 finalized in June 1999
- The GASB regularly reviews existing standards to examine effectiveness
- Pre-agenda research to identify how project has been implemented in practice
 - 11 roundtables
 - Surveys of preparers, auditors, and users
 - Review of audited financial reports
 - Literature research
 - 150+ interviews
- Project added to agenda in September implementation in 2020 21 most likely