

National Association of State Auditors, Comptrollers and Treasurers

Responses to the XBRL's CAFR Demonstration Taxonomy

	Comment
General Comments	
	<p>1) We noted numerous concepts for which the reference, Note column is blank when the reference, Publisher column indicates the GASB Codification.</p> <p>2) We suggest consideration be given to adding concepts for "Restricted Net Position" and "Unrestricted Net Position."</p> <p>3) Assuming that Concepts 25 – 250 are for the Governmentwide statements, how would these be distinguished for government-type activities and business-type activities?</p> <p>4) It appears as though the fund statement elements begin with Concept 251. How will the user input multiple funds?</p> <p>5) We suggest adding concepts related to Pension covered payroll and OPEB covered-employee payroll.</p> <p>6) To be consistent with the information reported for Pensions, the following concepts related to OPEB should be added:</p> <ul style="list-style-type: none"> a. healthcare cost trend rates, b. OPEB plan deferred outflows of resources, c. OPEB plan deferred inflows of resources, d. net OPEB liability at assumed healthcare cost trend rate plus 1%, and e. net OPEB liability at assumed healthcare cost trend rate minus 1%. <p>7) We suggest presenting OPEB plan related concepts in the order presented in GASB Section P50 and Paragraph 152, and Section P54 and Paragraph 137 (as applicable). Depending on user needs, consider including:</p> <ul style="list-style-type: none"> a. beginning balances for TOL, OPEB plan's fiduciary NP and NOL, b. changes of benefit terms, c. differences between expected and actual experience in the measurement of TOL, d. contributions from active employees and inactive employees not yet receiving benefit payments, e. other changes, separately identified if individually significant, f. ending balances for TOL, OPEB plan's fiduciary NP and NOL, and g. any special funding situation. <p>Where possible, we have included references in the columns titled "reference, Publisher" and "reference, Note" in the accompanying Excel worksheet beginning on line 517.</p>
	<p>In the "elements" column, there are a number of accounts that are similar, but not the same as accounts we use in the State's CAFR. For example, element 220 refers to Expenses for Other Public Services, this would generally be called Human Services for the State. Is the intent that governments would need to adapt to the titles of elements provided in the XBRL</p>

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	US version 0.2 – or will governments be able to modify elements to fit their current account titles?
	Our Office does not have any new comments to share on the draft CAFR taxonomy version 0.2. We would continue to encourage the Working Group to be engaged with due process documents issued by the GASB, given the importance of the financial reporting model to development of the taxonomy, and as a means to elevate the conversation on XBRL and the impact of standards on consistency and electronic reporting within the state and local government community.
Concept #	
9 – 10, 37, 39, 181 – 196, 198, 201 – 202, and 279 – 311	Consider replacing the references to the U.S. Census Bureau with references to the <i>Codification of Governmental Accounting and Financial Reporting Standards</i> or to the <i>Governmental GAAP Guide for State and Local Governments</i> .
11	The documentation column refers to the “comprehensive annual financial statements (CAFR)”; would it be more appropriate to revise this to “comprehensive annual financial report (CAFR)”?
25	Beginning with concept 25 (and in many subsequent concepts), the documentation column is awkwardly worded and begins, “report as at the relevant date,...”; would it be more appropriate to begin these concepts as “report at the relevant date,...”?
25	A better reference would be “Section 2450, footnote 2.”
32 – 35, 76 – 79, 264	The reference should be “Section I50,” not 150. “I” is for Investments
46	The documentation column refers to the “government-wide statement of net assets”; would it be more appropriate to revise this to “government-wide statement of net position”?
46 and 101	A better reference would be “Appendix B-GASB Concepts Statement 4, Paragraph 40.”
54	It is unclear why the documentation column for other receivables states, “its the total due to the entity within one year of the balance sheet date (or one operating cycle, if longer)...” There is no indication in the element or label columns that this is referring to a short term or current type of asset. Additionally, we believe “its” should be revised to “it’s”.
62, 80, and 261	The reference should be “Section I40,” not 140. “I” is for Inventories.
63 – 66	A better reference would be “Section 2300, footnote 1.”
75	The documentation column lists examples of physical assets, but does not list examples of intangible assets. We suggest including examples of intangible assets, as well, such as computer software.
84 and 137	Better references would be “Section P20.”
88	A better reference would be “Appendix B-GASB Concepts Statement 4, Paragraphs 8 through 16.”

	Comment
89 and 142	Better references would be "Appendix B-GASB Concepts Statement 4, Paragraphs 32 and 33" and "Appendix B-GASB Concepts Statement 4, Paragraphs 34 and 35," respectively. Also, consider breaking these categories into different elements (e.g., Deferred Outflows of Resources Pensions and Deferred Outflows of Resources OPEB), since they are elements of the statement of net position, like any other element and, therefore, there is no reason to model them differently.
95	The documentation column explains, "accounts payable is a short term liability account..." Accounts payable is a generic term that can encompass both short and long term liabilities; would it be more appropriate to remove the reference to short term?
95 and 117	We suggest that a more authoritative source be referenced for these two concepts.
112	We are not clear what the definition of a balance sheet account called "due to entities funds" would be. Expanding the documentation column would be helpful.
125, 135, 254	It is not clear to us why bonds and interest payable would be included as one account.
127 – 128, 138	We find the latter portion of the documentation column in these two concepts to be confusing. "Liabilities are amount of obligations for items that have entered into the operating cycle incurred in the acquisition of materials and supplies to be used in providing services; collections received in advance of the performance of services." Please consider modifying to more clearly define the situation.
129 and 267	Better references would be "Section P50, footnotes 7 and 13."
144	Would it be more appropriate to call this concept "net investment in capital assets" as opposed to "investment in capital assets?" Additionally, in two instances within this concept deferred inflows of resources are referred to as "deferred inflow of resources"; would it be more appropriate to consistently use deferred inflows of resources throughout the concept?
144	We suggest revising the title and label of this concept from "Investment in Capital Assets" to "Net Investment in Capital Assets" as this is the more common presentation of the element.
144 – 145, 147, 343 – 345, and 365 – 368	We suggest "Chapter I" be removed from the reference as "Chapter I" does not exist in the GASB Codification.
145 – 146	The documentation column refers to a "statement of financial position"; would it be more appropriate to refer to a "statement of net position"?
200	The current reference "Page 9 and Part II, 5.E" does not exist in the GASB Codification. The reference should be "Section 1600 and Paragraph 109."
201	There is an extra closing parenthesis in the documentation column.
212	This concept has a very lengthy documentation about special and extraordinary items, but the concept is adjustments for transfer of revenues within activities. It isn't clear what the correlation is between these two. It would be helpful if this could be updated. Additionally, there are a lot of run-on thoughts in the documentation column that make it difficult to read and interpret.
212	The element title of this concept is "Adjustments for transfer of revenues within activities." The entry in the reference, Note column to GASB Codification Section 2200 paragraphs 143 and 144 refers to Extraordinary and Special Items. The Documentation column also includes

	Comment
	mention of Transfers and Contributions to permanent funds. We suggest this concept be replaced with these four elements: Extraordinary Items, Special Items, Transfers, and Contributions.
213	The current references need revising. Section 1800, Paragraph 130 is incorrect. Section 2800 is the statistical section which does not appear to apply and it is not clear to what Paragraph 508 refers.
240 and 306	Center is spelled "centre" throughout these two concepts.
250	It isn't clear to us why the net position at beginning of period (after adjustments) would be explained as "amounts reflected as the closing balance of net position" in the documentation column.
266	There are several instances where "its" is used where "it is" or "it's" should be used throughout the document.
278	The current reference is not clear.
308	The documentation column is written as, "Report for the relevant, period, the monetary value, of expenditures for capital outlay. It includes construction include: production, additions, replacements, or major structural alterations to buildings and other improvements. Purchase of equipment, land, and existing structures include capital leases." A space is needed after sentence one. The wording in the 2nd and 3rd sentences of the documentation column needs to be revised to be clearer. For example, the beginning of sentence two, should it say "Includes construction, including: production,..." Is sentence three trying to say this should include purchases and capital leases of equipment, land and existing structures? Note: The concept of capital leases goes away with the implementation of GASB 87.
316	We believe the element column is mis-labeled. It says "US CAFR XBRL Taxonomy version 5.0"; however, the label column says "adjustments in fund balances for restatements (errors and accounting policy). Additionally, the content of the documentation column is difficult to read and follow.
316	The title of the element is "US CAFR XBRL Taxonomy version 5.0" but should be "Adjustmentsinfundbalancesforrestatements(errorsandaccountingpolicy)."
320 – 327, 336 – 371, 398 – 514	Certain pieces of information in the Documentation and Type columns are not clear. For example, Concept 320 includes "This concept is a placeholder to hold axis" in the Documentation column and nonnum:domainItemType in the Type column. It is not apparent whether these entries need clarification.
329	This lists governmental activities or business type activities or primary governmental activities. We aren't sure what is meant by "primary governmental activities"?
334	We aren't sure what "other miscellaneous funds" refers to. Why not just add permanent funds and remove other miscellaneous funds.
350 – 352	The documentation column states, "special revenue fund are used to account for..."; fund should be plural.
359 – 361	These elements are listed as "other fund"; wouldn't it be more appropriate to simply list permanent funds and eliminate other funds?

	Comment
363	This references "government funds" in the element, label and documentation columns; wouldn't it be more appropriate to refer to "governmental funds"? We aren't sure what the definition of government funds is.
364	The title of the element is "SpendableMember". Should this be "RestrictedMember" instead? Concepts 365 – 368 refer to Nonspendable, Committed, Assigned, and Unassigned fund balance, but there is no Restricted fund balance mentioned. If it should be Restricted, then the Documentation column should be revised to properly describe Restricted fund balance. The entry in the reference, Note column would then be Section 1800.165 through .177.
369 – 371	It is not clear what these concepts would be used for. There is no uncommitted fund balance element. Also, if an asset or liability is "unmatured", would it be reported in the fund financial statements?
Concept P_OPEB_23	This element is titled "Pension Annual Cost." The term "Annual Cost" is not used under GASB 68. We recommend changing the title to "Pension Expense."
Concept P_OPEB_24	This element is Pension Actuarial Valuation Date, but there is no Concept representing the Pension measurement date.
Concept P_OPEB_50	We suggest splitting this concept into "Inactive employees currently receiving benefits" and "Inactive employees entitled to but not yet receiving benefits."
Concept P_OPEB_52	This element is titled "OPEB Annual Cost." The term "OPEB Annual Cost" is not used under GASB 75. We suggest changing the title to "OPEB Expense."
Concept P_OPEB_53	This element is OPEB Actuarial Valuation Date, but there is no Concept representing the OPEB measurement date.