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Checklists and illustrative financial statements for defined benefit pension plans: a financial accounting and reporting practice aid, August 1998 edition

American Institute of Certified Public Accountants. Accounting and Auditing Publications

Linda Delahanty

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Checklists and Illustrative Financial Statements for Defined Benefit Pension Plans

A Financial Accounting and Reporting Practice Aid

Edited by
Linda Delahanty, CPA
Technical Manager, Accounting and Auditing Publications

Checklists and Illustrative Financial Statements for Defined Benefit Pension Plans has not been approved, disapproved, or otherwise acted upon by any senior technical committees of the American Institute of Certified Public Accountants or the Financial Accounting Standards Board and has no official or authoritative status.
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FSP Section 7000
Checklists and Illustrative Financial Statements for Defined Benefit Pension Plans

Description

.01 Employee benefit plans include defined benefit pension plans, defined contribution pension plans, and health and welfare benefit plans. Defined benefit pension plans provide a promise to pay to participants specified benefits that are determinable and are based on such factors as age, years of service, and compensation.

.02 Defined benefit pension plans may be single employer plans or multiemployer plans. In addition, these plans may be funded through accumulated contributions and investment income (self-funded plans), insurance contracts (insured plans), or a combination of both (split-funded plans). Contributions may be required from both employers and participants (contributory plans) or from employers only (noncontributory plans).

.03 The Pension Benefit Guaranty Corporation (PBGC) guarantees participants in most defined benefit pension plans against the loss of certain pension benefits if the plan terminates, and it administers terminated plans in certain circumstances.

Regulatory Requirements

.04 The Employee Retirement Income Security Act of 1974 (ERISA) provides for substantial federal government oversight of the operating and reporting practices of employee benefit plans. Under ERISA, the Department of Labor (DOL) and the Internal Revenue Service (IRS) have the authority to issue regulations covering reporting and disclosure requirements.

.05 ERISA generally requires that the administrator of an employee benefit plan prepare and file various documents with the DOL, the IRS, and the PBGC. The annual report to be filed for employee benefit plans generally is the Form 5500 Series. The Form 5500, a joint-agency form developed by the IRS, the DOL, and the PBGC, may be used to satisfy the annual reporting requirements of the Internal Revenue Code (IRC) and Titles I and IV of ERISA.

Financial Accounting and Reporting Standards

.06 FASB Statement of Financial Accounting Standards (SFAS) No. 35, Accounting and Reporting by Defined Benefit Pension Plans, as amended by SFAS No. 110, Reporting by Defined Benefit Pension Plans of Investment Contracts, is a source of established generally accepted accounting principles for defined benefit pension plans. The AICPA Audit and Accounting Guide Audits of Employee Benefit Plans, also is a source of established generally accepted accounting principles for defined benefit pension plans.

Accounting and Reporting by Defined Benefit Pension Plans

.07 Defined benefit pension plan financial statements intended to be presented in accordance with generally accepted accounting principles should be prepared on the accrual basis and should include the following:
• A statement of net assets available for benefits as of the end of the plan year (ERISA requires that this statement be presented in comparative form)

• A statement of changes in net assets available for benefits for the year then ended

• Information regarding the actuarial present value of accumulated plan benefits

• Information regarding the effects, if significant, of certain factors affecting the year-to-year change in accumulated plan benefits

.08 Information regarding the actuarial present value of accumulated plan benefits and changes therein may be presented in the financial statements or in the notes. Further, the accumulated benefit information may be presented as of the beginning or end of the plan year. If the information is as of the beginning of the year, prior year statements of net assets and changes therein are also required. Otherwise, comparative statements are not required (however, see paragraph .11 below).

.09 Except as noted in the following paragraph, plan investments are generally presented at their fair value at the reporting date and assets used in the administration of the plan are stated at cost less accumulated depreciation and amortization.

.10 Insurance contracts, defined in SFAS No. 60, Accounting and Reporting by Insurance Enterprises, should be presented in the same manner as specified in the annual report filed by a plan with certain governmental agencies pursuant to ERISA, consistent with the requirements of DOL Form 5500 or 5500-C/R. A plan not subject to ERISA should present its insurance contracts as if the plan were subject to the reporting requirements of ERISA.

.11 In addition to the reporting requirements of SFAS No. 35, as amended, defined benefit pension plans may have reporting requirements under ERISA. Schedules required by ERISA include the following:

• Line 27a—Schedule of Assets Held for Investment Purposes
• Line 27b—Schedule of Loans or Fixed Income Obligations
• Line 27c—Schedule of Leases in Default or Classified as Uncollectible
• Line 27d—Schedule of Reportable Transactions
• Line 27e—Schedule of Nonexempt Transactions
• Line 27f—Schedule of Nonexempt Transactions

Please refer to the Instructions to Form 5500 for schedule requirements.

Note: This publication was extracted from sections 7000 through 7400 of the AICPA Financial Statement Preparation Manual (FSP).
FSP Section 7100

Instructions

General

.01 This publication includes:

• Financial Statements and Notes Checklist—For use by preparers of defined benefit pension plan financial statements and by practitioners who audit them as they evaluate the adequacy of disclosures.

• Auditors' Report Checklist—For use by auditors in reporting on audited defined benefit pension plan financial statements.

• Illustrative Financial Statements and Auditor's Reports—Illustrating a defined benefit pension plan financial statement and auditor’s reports.

.02 The checklists and illustrative financial statements included in this section have been developed by the staff of the Accounting and Auditing Publications Team of the AICPA as nonauthoritative practice aids to be used as a memory jogger to aid in the audit of financial statements of defined benefit pension plans.

The checklists have been updated to include guidance relevant to employee benefit plans contained in official pronouncements issued through:

• FASB Statement of Financial Accounting Standards No. 132, Employers' Disclosures about Pensions and Other Postretirement Benefits

• FASB Interpretation No. 42, Accounting for Transfers of Assets in Which a Not-for-Profit Organization Is Granted Variance Power

• FASB Technical Bulletin No. 94-1, Application of Statement 115 to Debt Securities Restructured in a Troubled Debt Restructuring

• AICPA Statement on Auditing Standards No. 86, Amendment to SAS No. 72, Letters for Underwriters and Certain Other Requesting Parties

• AICPA Statement of Position No. 98-6, Reporting on Management's Assessment Pursuant to the Life Insurance Ethical Market Conduct Program of the Insurance Marketplace Standards Association

• AICPA Audit and Accounting Guide Audits of Employee Benefit Plans (with conforming changes as of May 1, 1998)

• AICPA Practice Bulletin No. 15, Accounting by the Issuer of Surplus Notes

• FASB EITF consensuses adopted up to and including the March 1998 Emerging Issues Task Force meeting.

The checklists and illustrative financial statements should be modified, as appropriate, for subsequent pronouncements. In determining the applicability of a pronouncement, its effective date should also be considered.

Instructions

.03 The checklists consist of a number of questions or statements that are accompanied by references to the applicable authoritative pronouncements. The checklists provide for checking off or initialing each ques-
tion or point to show that it has been considered. Users should check: “yes” if the disclosure has been appropriately made, “no” if the disclosure has not been made, or “n/a” if the disclosure is not applicable to the engagement. The auditor should consider the effect of a “no” answer on his/her report. A “no” answer that is material to the financial statements may warrant a departure from an unqualified opinion. (See paragraphs 20–63 of SAS No. 58, Reports on Audited Financial Statements, as amended [AICPA, Professional Standards, vol. 1, AU sec. 508.20–.63].) If a “no” answer is checked, the authors recommend that a note be made in the right margin to explain why the disclosure was not made (for example, if the disclosure was not made because it was not material to the financial statements, write “not material” in the right margin). The right margin may be used for other remarks or comments as appropriate, including cross-referencing to applicable workpapers where the support to a disclosure may be found. Use of the checklists requires the exercise of individual professional judgment and may likely require some modification based on the circumstances of individual engagements.

.04 The checklist is not a substitute for the authoritative pronouncements. Users of the checklists and illustrative financial statements are urged to refer directly to applicable authoritative pronouncements when appropriate. The checklists and illustrative financial statements do not include all disclosures and presentation items promulgated nor do they represent minimum requirements. Pronouncements deemed remote for defined benefit plans are not included in this document. The checklists and illustrative financial statements are “tools” and in no way represent official positions or pronouncements of the AICPA.

.05 If you have further questions, call the AICPA Technical Hotline at 1-888-777-7077.
FSP Section 7200
Financial Statements and Notes Checklist

.01 This checklist has been developed by the staff of the Accounting and Auditing Publications Team of the AICPA as a nonauthoritative practice aid.

.02 Explanation of References:
- AAG = AICPA Audit and Accounting Guide Audits of Employee Benefit Plans (with conforming changes as of May 1, 1998)
- SFAS = FASB Statement of Financial Accounting Standards
- FASBI = FASB Interpretation
- APB = Accounting Principles Board Opinion
- ARB = Accounting Research Bulletin
- AC = Reference to section number in FASB Accounting Standards—Current Text
- SAS = AICPA Statement on Auditing Standards
- AU = Reference to section number in AICPA Professional Standards (vol. 1)
- CFR = Code of Federal Regulations
- DOL = Department of Labor
- ERISA = Employee Retirement Income Security Act of 1974
- PBGC = Pension Benefit Guaranty Corporation

.03 Checklist Questionnaire:
This financial statement disclosure checklist is organized into the sections listed below. Carefully review the topics listed and consider whether they represent potential disclosure items for the plan. Place a check mark by the topics or sections considered not applicable; these sections need not be completed. For example, if the plan has not or is not being terminated, place a check by Other Financial Statement Disclosures, Section H, “Plan Terminations,” and skip this section when completing the checklist.

Place ✓ by Sections Not Applicable

- General
  A. Titles and References
  B. Comparative Financial Statements

- Statement of Net Assets Available for Benefits
  A. General
  B. Investments
  C. Operating Assets
  D. Contributions Receivable and Uncollectible Amounts
  E. Cash
  F. Liabilities

- Statement of Changes in Net Assets Available for Benefits
  A. General
B. Contributions
C. Investment Earnings
D. Transfer of Assets to or From Other Plans

• Statement of Accumulated Plan Benefits
  A. Actuarial Present Value of Accumulated Plan Benefits
  B. Accumulated Contributions of Present Employees

• Statement of Changes in Accumulated Plan Benefits
  A. Presentation of Changes in the Actuarial Present Value of Accumulated Plan Benefits
  B. Changes in Actuarial Assumptions
  C. Benefits Paid and Other

• Summary of Significant Accounting Policies
  A. Accounting Policies
  B. Certain Significant Estimates

• Other Financial Statement Disclosures
  A. Changes in Accounting
  B. Commitments and Contingencies
  C. Current Vulnerabilities Due to Certain Concentrations
  D. Description of Pension Plan
  E. Description of Pension Plan Amendments
  F. Financial Instruments
  G. Income Tax Status
  H. Plan Terminations
  I. Related-Party Transactions
  J. Subsequent Events
  K. Other Matters

• ERISA Reporting Requirements
  A. Form 5500 Series Report
  B. Financial Statement Disclosures Required Under the Alternative Method of Compliance for Pension Plans Pursuant to DOL Regulations Section CFR 2520.103 and Section 103 of ERISA
  C. Required Financial Statements and Supporting Schedules

• Auditors’ Report Checklist

• Illustrative Financial Statements

General

A. Titles and References
1. For a full presentation in conformity with generally accepted accounting principles (GAAP), are the following financial statements presented:
   a. A “Statement of Net Assets Available for Benefits” as of the end of the plan year?
      [ERISA requires that this statement be presented in comparative form]
<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
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<tbody>
<tr>
<td>b. A “Statement of Changes in the Net Assets Available for Benefits” for the year then ended?</td>
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<tr>
<td>c. A “Statement of Accumulated Plan Benefits” as of either the beginning (amounts as of the end of the preceding year) or end of the plan year?</td>
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<tr>
<td></td>
<td>[SFAS 35 recommends reporting as of the end of the plan year]</td>
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<tr>
<td>d. A “Statement of Changes in Accumulated Plan Benefits”?</td>
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<td></td>
<td>[SFAS 35, pars. 6 and 8 (AC Pe5.105 and .107); AAG, par. 2.07]</td>
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</table>

**Practice Tip**

The information in Steps c. and d. above can be alternatively disclosed in the notes to the financial statements.

2. Is the information regarding both the net assets available for benefits and the actuarial present value of accumulated plan benefits presented as of the same date?  
   [SFAS 35, par. 7 (AC Pe5.106)]

3. Is the information regarding both the changes in net assets available for benefits and the changes in the actuarial present value of accumulated plan benefits presented for the same period?  
   [SFAS 35, par. 7 (AC Pe5.106)]

4. If accumulated plan benefit information is presented as of the beginning of the year, have the prior year statements of net assets and changes therein also been included?  
   [SFAS 35, par. 7 (AC Pe5.106); AAG par. 2.20]

5. Do the plan financial statements include information about the plan resources and how the stewardship responsibility for those resources has been discharged, and other factors necessary for users and participants to understand the information provided?  
   [SFAS 35, par. 5 (AC Pe5.104)]

6. Is each financial statement suitably titled?  
   [SAS 62, par. 7 (AU 623.07)]

7. Does each statement include a reference to the notes, which are an integral part of the financial statements?  
   [Generally Accepted]

**B. Comparative Financial Statements**

1. Are comparative statements presented if appropriate?  
   [ARB 43, Ch. 2A, pars. 1 and 2 (AC F43.101 and .102)]

2. Are the notes and other disclosures included in the financial statements of the prior year(s) presented, repeated, or at least referred to, to the extent that they continue to be of significance?  
   [ARB 43, Ch. 2A, par. 2 (AC F43.102)]

3. If changes occurred in the manner of or basis for presenting corresponding items for two or more periods, are appropriate explanations of the changes disclosed?  
   [ARB 43, Ch. 2A, par. 3 (AC F43.103)]

---

1 ERISA requires that the “Statement of Net Assets Available for Benefits” be presented in comparative form. In addition, if the accumulated benefit information is presented as of the beginning of the plan year, prior year statements of net assets and changes therein are required. [AAG, pars. 2.07, fn. 3, and 2.20]
Statement of Net Assets Available for Benefits

A. General

1. Is the information in the "Statement of Net Assets Available for Benefits" presented in such reasonable detail as is necessary to identify the plan's resources that are available for benefits? [SFAS 35, par. 9 (AC Pe5.108)]

B. Investments

1. Are the plan's investments presented in enough detail to identify the types of investments and whether reported fair values have been measured by quoted prices in an active market or otherwise determined? [SFAS 35, par. 13 (AC Pe5.112); AAG, par. 2.13]

2. Are the following investments reported as separate line items in the "Statement of Net Assets Available for Benefits":
   a. Government securities?
   b. Short-term securities?
   c. Corporate bonds?
   d. Common stocks?
   e. Mortgages?
   f. Real estate?
   g. Investments in bank common and commingled trust funds?
   h. Master trusts?
   i. Investments in contracts with insurance companies, including separate accounts, deposit administration, and immediate participation guarantee (IPG) contracts? [AAG, par. 2.13]

3. Are investments that represent 5 percent or more of the plan's total net assets available for benefits separately identified in the financial statements or notes thereto? [SFAS 35, par. 28g (AC Pe5.127g); AAG, par. 2.26g]

Practice Tip

Listing all investments in the Schedule of Assets Held for Investment Purposes required by ERISA does not eliminate the requirement to include this disclosure in the financial statements. [AAG, par. 2.26g]

4. Are the investments of a master trust detailed by general type, such as government securities, short-term securities, corporate bonds, common stocks, mortgages, and real estate, as of the date of each "Statement of Net Assets Available for Benefits" presented? [AAG, par. 2.31]

5. Do disclosures include a description of the basis used to allocate net assets, net investment income, gains and losses to participating plans, and the plan's percentage interest in a master trust as of the date of each "Statement of Net Assets Available for Benefits"? [AAG, par. 2.31]
C. Operating Assets

1. For depreciable assets, do the financial statements include disclosure of:

   a. Depreciation expense for each period? __________

   b. Balances of major classes of depreciable assets by nature or function? __________

   c. Accumulated depreciation, either by major classes of assets or in total? __________

   d. The method or methods used in computing depreciation for each major class of depreciable assets? [APB 12, par. 5a–d (AC D40.105a–d)] __________

2. If an impairment loss is recognized for assets to be held and used, do disclosures include:

   a. A description of the impaired assets and the facts and circumstances leading to the impairment? __________

   b. The amount of the impairment loss and how fair value was determined? __________

   c. The caption in the “Statement of Changes in Net Assets Available for Benefits” in which the impairment loss is aggregated if that loss has not been presented as a separate caption or reported parenthetically on the face of the statement? [SFAS 121, par. 14 (AC I08.133)] __________

3. If assets to be disposed of are accounted for in accordance with paragraphs 15–17 of SFAS 121, do disclosures include:

   a. A description of assets to be disposed of, the facts and circumstances leading to the expected disposal, the expected disposal date, and the carrying amount of those assets? __________

   b. The loss, if any, resulting from applying paragraph 15 of SFAS 121? __________

   c. The gain or loss, resulting from changes in the carrying amounts of assets to be disposed of, that arises from applying paragraph 17 of SFAS 121? __________

   d. The caption in the “Statement of Changes in Net Assets Available for Benefits” in which the gains or losses in Steps b. and c. are aggregated if those gains or losses are not presented as a separate caption or reported parenthetically on the face of the statement? __________

   e. The results of operations for assets to be disposed of to the extent that those results are included in the plan’s results of operations for the period and can be identified? [SFAS 121, par. 19 (AC I08.138)] __________

4. If an impairment loss is recognized, is it reported as a component of net assets available for benefits? [SFAS 121, pars. 13 and 18 (AC I08.137)] __________

D. Contributions Receivable and Uncollectible Amounts

1. Are the following contributions receivable separately identified:

   a. Receivables from employer(s)? __________
b. Receivables from participants?  

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
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c. Other sources of funding pursuant to formal commitments as well as legal or contractual requirements?  
[SFAS 35, par. 10 (AC Pe5.109); AAG, par. 2.14]

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
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</table>

2. Do contributions receivable include an allowance for uncollectible amounts?  
[SFAS 35, par. 91 (AC Pe5.109); AAG, pars. 2.14 and 2.15]

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
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E. Cash

1. Is separate disclosure made of restricted cash?  
[ARB 43, Ch. 3A, par. 6 (AC B05.107)]

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
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</thead>
</table>

F. Liabilities

1. Are liabilities (other than for benefits) deducted in arriving at net assets available for plan benefits?  
[AAG, par. 2.18]

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
</table>

2. Consider stating separately:
   a. Due to broker for securities purchased?  
   b. Accounts payable?  
   c. Accrued expenses?  
   [AAG, par. 2.18 and App. D, Exhibits D-1 and D-5]

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
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</table>

Statement of Changes in Net Assets Available for Benefits

A. General

1. Does the "Statement of Changes in Net Assets Available for Benefits" (or the notes to the financial statements) present the net appreciation (depreciation) in the fair value of each significant type of investment, segregated between investments whose fair values have been measured by quoted market prices in an active market and those whose fair values have been otherwise determined?  
[SFAS 35, par. 15 (AC Pe5.114a); AAG, par. 2.19]

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
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</table>

2. At a minimum, does the "Statement of Changes in Net Assets Available for Benefits" disclose:
   a. Investment income (exclusive of changes in fair value)?  
   b. Contributions from employer(s), segregated between cash and noncash contributions?  
   c. Contributions from participants, including those transmitted by the sponsor?  
   d. Contributions from other sources (e.g., state subsidies or federal grants)?  
   e. Benefits paid to participants?  
   f. Payments to insurance companies to purchase contracts that are excluded from plan assets?

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
</table>
Practice Tip
Dividend income related to contracts with insurance companies that are excluded from plan assets may be netted against Step 2.f. above. [SFAS 35, pars. 28e and 15g, fn. 9 (AC Pe5.127e and .114g, fn. 13)]

B. Contributions
1. Is the nature of noncash contributions described, either parenthetically or in a footnote? [SFAS 35, par. 15c, fn. 8 (AC Pe5.114c, fn. 12)]

C. Investment Earnings
1. Does the net appreciation (depreciation) in the fair value of investments (see Step A.1 above) include realized gains and losses on investments that were both bought and sold during the year?2
   [SFAS 35, par. 15, fn. 7 (AC Pe5.114, fn. 10); AAG, par. 2.19]
2. Is the net change in the fair value of each significant type of investment of a master trust and total investment income of the master trust by type (e.g., interest, dividends, etc.) disclosed for each period for which a "Statement of Changes in Net Assets Available for Benefits" is presented?
   [AAG, par. 2.31]

D. Transfer of Assets to or From Other Plans
1. If there are significant transfers of assets to or from other plans, are they disclosed?
   [AAG, par. 2.19]

Statement of Accumulated Plan Benefits

Practice Tip
The benefit information may be presented in a separate statement, combined with other information in the financial statements, or presented in a note to the financial statements. Regardless of the presentation, the benefit information should all be located in one place. [AAG, par. 2.23]

A. Actuarial Present Value of Accumulated Plan Benefits
1. Is the total actuarial present value of accumulated plan benefits as of the benefit information date segmented into at least the following categories:
   a. Vested benefits of participants currently receiving payments?
   b. Other vested benefits?
   c. Nonvested benefits?
   [SFAS 35, par. 22 (AC Pe5.121); AAG, par. 2.23]

---

2 Gains and losses from investments sold need not be segregated from unrealized gains and losses relating to investments held at year-end.
2. Does the amount disclosed as vested benefits of participants currently receiving payments include those benefits due and payable as of the benefit information date?  
[SFAS 35, par. 22 (AC Pe5.121)]

B. Accumulated Contributions of Present Employees

1. If the plan is contributory, is the amount of active employees’ accumulated contributions as of the benefit information date (including interest, if any) disclosed?  
[SFAS 35, par. 22 (AC Pe5.121); AAG, par. 2.23]

2. If interest has been credited on employees’ contributions, is the rate(s) disclosed?  
[SFAS 35, par. 22 (AC Pe5.121); AAG, par. 2.23]

Statement of Changes in Accumulated Plan Benefits

Practice Tip
The changes in accumulated plan benefits may be presented either in a separate statement or presented in the notes to the financial statements. [AAG, par. 2.24]

A. Presentation of Changes in the Actuarial Present Value of Accumulated Plan Benefits

1. If significant, is information disclosed regarding the effects of certain factors affecting the change in the actuarial present value of accumulated plan benefits from the preceding to the current benefit information date?  
[SFAS 35, par. 25 (AC Pe5.124); AAG, par. 2.24]

2. At a minimum, do disclosures include the significant effects of such factors as:
   a. Plan amendments?  
   b. Changes in the nature of the plan (e.g., as a result of a spinoff or merger)?  
   c. Changes in actuarial assumptions?3

3. Are the significant effects of other factors identified, such as:
   a. Benefits accumulated?  
   b. The increase (for interest) as a result of the decrease in the discount period?  
   c. Benefits paid?  
[SFAS 35, par. 25 (AC Pe5.124); AAG, par. 2.24]

4. If any one factor is individually significant, is that factor separately disclosed?  
[SFAS 35, par. 25 (AC Pe5.124); AAG, par. 2.24]

Practice Tip
Actuarial experience gains or losses may be included with the effects of additional benefits accumulated rather than being separately disclosed. [SFAS 35, par. 25, fn. 12 (AC Pe5.124, fn. 17)]

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3 Changes in actuarial assumptions are to be viewed as changes in accounting estimates, and therefore previously reported amounts should not be restated.

12
B. Changes in Actuarial Assumptions

1. For plans that measure the actuarial present value of accumulated plan benefits by insurance company rates pursuant to the approach described in paragraph 21 of SFAS 35 (AC Pe5.120), are the effects of the changes in actuarial assumptions reflected in changes in those insurance rates disclosed, if practicable? [SFAS 35, par. 25, fn. 11 (AC Pe5.124, fn. 16)]

2. If the effects of changes in actuarial assumptions discussed in Step 1 above cannot be separately disclosed, are those effects included in benefits accumulated? [SFAS 35, par. 25, fn. 12 (AC Pe5.124, fn. 17)]

C. Benefits Paid and Other

1. Are amounts paid by the plan to an insurance company pursuant to a contract that is excluded from plan assets (including the purchase of annuities with amounts allocated from existing investments with the insurance company) included in benefits paid? [SFAS 35, par. 25 (AC Pe5.124)]

2. In presenting the changes in the actuarial present value of accumulated plan benefits, if only the minimum required disclosure is presented and a “statement format” is used, is an additional “other” category used to reconcile the beginning and ending amounts? [SFAS 35, pars. 25 and 26 (AC Pe5.124 and .125); AAG, par. 2.24]

Summary of Significant Accounting Policies

A. Accounting Policies

1. Is a description of all significant accounting policies of the pension plan presented in a separate “summary of significant accounting policies” preceding the notes to the financial statements or as the initial note? [APB 22, pars. 8 and 15 (AC A10.102 and 108)]

2. Does the disclosure of significant accounting policies identify and describe all significant accounting principles followed by the reporting entity and the methods of applying those principles that materially affect the determination of financial position and results of operations, including instances in which there:
   a. Is a selection from existing acceptable alternatives?
   b. Are principles and methods peculiar to the industry in which the reporting entity operates, even if such principles and methods are predominantly followed in that industry?
   c. Are unusual or innovative applications of GAAP? [APB 22, par. 12 (AC A10.105)]

3. Does the disclosure of significant accounting policies include appropriate reference to details presented elsewhere (in the statements and notes thereto) so duplication of details is avoided? [APB 22, par. 14 (AC A10.107)]
4. Is an explanation that the preparation of financial statements in conformity with GAAP requires the use of management's estimates included?  
[SOP 94-6, par. 11]  

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<th>Yes</th>
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5. Does the disclosure of significant accounting policies include a description of the method(s) and significant assumptions used to determine the fair value of investments and the reported value of insurance contracts?  
[SFAS 35, par. 27a (AC Pe5.126a); AAG, par. 2.25]  

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<th>Yes</th>
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6. Does the disclosure of significant accounting policies include a description of the method and significant assumptions (e.g., assumed rates of return, inflation rates, and retirement ages) used to determine the actuarial present value of accumulated plan benefits, including any significant changes in the method or assumptions during the year?  
[SFAS 35, par. 27b (AC Pe5.126b); AAG, par. 2.25]  

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<th>Yes</th>
<th>No</th>
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7. If administrative expenses expected to be paid by the plan (not those paid by the sponsor) that are associated with providing accumulated plan benefits are reflected by appropriately adjusting the assumed rates of return, is the adjustment of the assumed rates of return disclosed separately?  
[SFAS 35, par. 20c (AC Pe5.119c)]  

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<th>Yes</th>
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B. Certain Significant Estimates  

1. If known information available before the financial statements are issued indicates that: (a) it is at least reasonably possible that the effect on the financial statements of a condition, situation, or set of circumstances that existed at the date of the financial statements will change in the near term due to one or more future confirming events, and (b) the effect of the change would be material to the financial statements:  
   a. Is disclosure made of the nature of the uncertainty, including an indication that it is at least reasonably possible that a change in the estimate will occur in the near term?  
      [SOP 94-6, pars. 13 and 14]  
      | Yes | No | N/A |
      |-----|----|-----|
   b. If the estimate involves a loss contingency covered by SFAS 5, does the disclosure include an estimate of the possible range of loss, or state that such an estimate cannot be made?  
      | Yes | No | N/A |
      |-----|----|-----|
   c. Does the disclosure describe the factors that cause the estimate to be sensitive to change?  
      [SOP 94-6, pars. 13 and 14]  
      | Yes | No | N/A |
      |-----|----|-----|

Other Financial Statement Disclosures  

A. Changes in Accounting  

1. For all changes in accounting principles, are disclosures made in the year of change as to the:  
   a. Nature of the change?  
      [APB 20, pars. 17 and 19 (AC A06.113 and .115)]  
      | Yes | No | N/A |
      |-----|----|-----|
   b. Justification for the change, including a clear explanation of why the newly adopted accounting principle is preferable?  
      | Yes | No | N/A |
      |-----|----|-----|
   c. Effect on net additions (deductions) to the plan's net assets?  
      | Yes | No | N/A |
      |-----|----|-----|
2. For those changes in accounting principles requiring disclosure of cumulative effect and pro forma amounts, are such disclosures made? If it is not possible to determine such effect, is the reason for not reporting the cumulative effect of the change or the pro forma amounts of prior years disclosed? [APB 20, pars. 19–22 and 25 (AC A06.115–.118)]

3. Is the correction of an error shown as a prior-period adjustment with disclosure of the following in the period of its discovery and correction?
   a. Nature of the error in previously issued financial statements?
   [APB 20, par. 37 (AC A35.105)]

4. For changes in accounting estimates:
   a. If a change in an accounting estimate affects several future periods, is its effect on the change in net assets available for benefits of the current period disclosed? [APB 20, par. 33 (AC A06.132)]
   b. If a change in an accounting estimate has no material effect in the period of change but is reasonably certain to materially affect later periods, is the change disclosed in the financial statements of the period of change? [APB 20, par. 38 (AC A06.133)]

5. For a change in reporting entity, such as a merger of two or more plans, are transferred assets reported as a separate line item in the "Statement of Changes in Net Assets," and are the nature of the change and the reason for it disclosed? [APB 20, pars. 34 and 35 (AC A35.112 and .113)]

B. Commitments and Contingencies

1. Are the nature and amount of accrued loss contingencies, including those related to litigation, claims and assessments, disclosed as necessary to keep the financial statements from being misleading? [SFAS 5, pars. 9 and 34 (AC C59.108 and .140)]

2. For loss contingencies not accrued when there is at least a reasonable possibility that a loss may have been incurred or an exposure to loss exists in excess of the amount accrued for a loss contingency, including those related to litigation, claims, and assessments, do disclosures indicate:
   a. Nature of the contingency?
   b. Estimate of possible loss or range of loss, or a statement that such estimate cannot be made? [SFAS 5, pars. 10 and 33–39 (AC C59.109 and .139–.145)]

3. Are gain contingencies disclosed with care to avoid any misleading implications about likelihood of realization? [SFAS 5, par. 17 (AC C59.118)]

4. Are the nature and amount of any guarantees (e.g., guarantees of indebtedness of others) disclosed even though the possibility of loss may be remote? [SFAS 5, par. 12 (AC C59.113); FASBI 34, pars. 1–3 (AC C59.114); EITF 85-20]
5. Is there adequate disclosure of commitments, such as those for capital expenditures, restrictive covenants in financing agreements, and employment contracts?  
[SFAS 5, pars. 18 and 19 (AC C59.120)]

C. Current Vulnerability Due to Certain Concentrations

1. Is disclosure including information that is adequate to inform users of the general nature of the risk associated with concentrations in the volume of business transacted with a particular customer, supplier, lender, grantor, or contributor; in revenue from particular products, services, or fund-raising events; in the available sources of supply of materials, labor, or services, or licenses or other rights used in the reporting entity’s operations; or in the market or geographic area in which the reporting entity conducts its operations made if, based on information known to management before the financial statements are issued, (a) the concentration existed at the date of the financial statements, (b) made the enterprise vulnerable to the risk of a near-term severe impact, and (c) it is at least reasonably possible that the events that could cause the severe impact will occur in the near term?  
[SOP 94-6, pars. 21 and 22]

D. Description of Pension Plan

1. Do disclosures include a brief, general description of the plan agreement, including its vesting and benefit provisions?  
[SFAS 35, par. 28a (AC Pe5.127a); AAG, par. 2.26a; SOP 94-6, par. 10]

2. For ERISA plans, does the plan description include the priority order of participants’ claims to the assets of the plan upon plan termination and the benefits guaranteed by the PBGC?  
[SFAS 35, par. 28c (AC Pe5.127c); AAG, par. 2.26c]

Practice Tip

If material providing this information is otherwise published and made available to participants (e.g., employee handbook), the disclosures required by paragraph 28a and c can be omitted provided that (1) a reference to the other source is made and (2) for paragraph 28c only, disclosure similar to that stated in SFAS 35 is made. Refer to SFAS 35, paragraph 28c, fn. 16 (AC Pe5.127c, fn. 21) for appropriate wording.

E. Description of Pension Plan Amendments

1. Do disclosures include a description of significant plan amendments adopted during the year?  
[SFAS 35, par. 28b (AC Pe5.127b); AAG, par. 2.26b]

2. If significant plan amendments were adopted after the date of the accumulated benefit information, and accordingly their effect was not included in the calculation, is this fact stated?  
[SFAS 35, par. 28b (AC Pe5.127b); AAG, par. 2.26b]

3. For ERISA plans, do the disclosures include a discussion of the application of the PBGC guaranty to any recent plan amendments?  
[SFAS 35, par. 28c (AC Pe5.127c); AAG, par. 2.26c]
Practice Tip
If material providing this information is otherwise published and made available to participants (e.g., employee handbook), the disclosure required by paragraph 28c can be omitted provided that (1) a reference to the other source is made and (2) disclosure similar to that stated in SFAS 35 is made. Refer to SFAS 35, par. 28c, fn. 16 (AC Pe5.127c, fn. 21) for appropriate wording.

F. Financial Instruments

1. If the plan holds or is party to financial instruments with off-balance-sheet risk (except for those excluded in SFAS 105), are the following disclosed by category of financial instrument:
   a. The face or contract amount (or notional principal amount if there is no face or contract amount)?
   b. The nature and terms, including, at a minimum, a discussion of:
      (1) The credit and market risk of those instruments?
      (2) The cash requirements of those instruments?
      (3) The related accounting policies pursuant to the requirements of APB 22 (AC A10)?
         [SFAS 105, par. 17, as amended by SFAS 119, par. 14b (AC F25.112); AAG, par. 2.29]

Practice Tip
“Category of financial instrument” refers to class of financial instrument, business activity, risk, or other category that is consistent with the management of those instruments. If disaggregation of financial instruments is other than by class, the plan also should describe for each category the classes of financial instruments included in that category.

2. Do the disclosures in Steps 1.a and 1.b distinguish between financial instruments with off-balance-sheet risk held or issued for trading purposes, and financial instruments with off-balance-sheet risk held or issued for purposes other than trading?
   [SFAS 105, par. 17, as amended by SFAS 119, par. 14d (AC F25.112A); AAG, par. 2.29]

3. For financial instruments with off-balance-sheet credit risk (except for those excluded by paragraphs 14 and 15 of SFAS 105), are the following disclosed by category of financial instrument:
   a. The amount of accounting loss the plan would incur if any party to the financial instrument failed completely to perform according to the terms of the contract and the collateral or other security, if any, for the amount due proved to be of no value to the plan?
   b. The plan’s policy of requiring collateral or other security to support financial instruments subject to credit risk?
   c. Information about the plan’s access to that collateral or other security?
   d. The nature and a brief description of the collateral or other security supporting those financial statements?
      [SFAS 105, par. 18, as amended by SFAS 119, par. 14b (AC F25.113); AAG, par. 2.29]
4. Do disclosures of all significant concentrations of credit risk arising from all financial instruments, whether from an individual counterparty or groups of counterparties (except for certain insurance and investment contracts, purchase and pension obligations), include:

a. Information about the (shared) activity, region, or economic characteristic that identifies the concentration? Yes No N/A

b. The amount of the accounting loss due to credit risk the plan would incur if parties to the financial instruments that make up the concentration failed completely to perform according to the terms of the contracts and the collateral or other security, if any, for the amount due proved to be of no value to the plan? Yes No N/A

c. The plan’s policy of requiring collateral or other security to support financial instruments subject to credit risk? Yes No N/A

d. Information about the plan’s access to that collateral or other security? Yes No N/A

e. The nature and a brief description of the collateral or other security supporting those financial statements? [SFAS 105, par. 20 (AC F25.115); AAG, par. 2.30]

Practice Tip

SFAS 126, Exemption from Certain Required Disclosures about Financial Instruments for Certain Nonpublic Entities, makes the disclosures about fair values of financial instruments prescribed in SFAS 107 optional for reporting entities that:

- Are nonpublic entities,
- Have total assets of less than $100 million on the date of the financial statements, and
- Did not hold or issue any derivative financial instruments, as defined in SFAS 119, other than loan commitments, during the reporting period.

5. For financial instruments for which it is practicable to estimate fair value (except for those excluded in paragraphs 8 and 13 of SFAS 107) are the following disclosed:

a. The fair value of the financial instruments? Yes No N/A

b. The methods and significant assumptions used to estimate the fair values of the instruments? (Note: This disclosure is not required for trade receivables and payables when their carrying amounts approximate fair value.) Yes No N/A

[SFAS 107, par. 10 (AC F25.115C)]

6. Are the fair values disclosed in the notes presented together with the related carrying amount in a form that makes it clear whether the fair value and carrying amount represent assets or liabilities and how the carrying amounts relate to what is reported in the “Statement of Net Assets Available for Benefits”? Yes No N/A

[SFAS 107, par. 10, as amended by SFAS 119, par. 15b (AC F25.115C); AAG, par. 2.33]

7. Do the disclosures distinguish between financial instruments held or issued for trading purposes, including dealing and other trading activities measured at fair value with gains and losses recognized in earnings, and financial instruments held or issued for purposes other than trading? Yes No N/A

[SFAS 107, par. 10, as amended by SFAS 119, par. 15c (AC F25.115C); AAG, par. 2.33]

5 If disclosed in more than a single note, one of the notes should include a summary table containing the fair value and related carrying amounts and cross-references to the location(s) of the remaining disclosures required by SFAS 107, as amended.
8. If it is not practicable to estimate the fair value of a financial instrument or a class of financial instruments, are the following disclosed:
   a. Information pertinent to estimating the fair value of the financial instrument or class of financial instruments, such as the carrying amount, effective interest rate, and maturity? ___ __ ___
   b. The reasons why it is not practicable to estimate fair value? [SFAS 107, par. 14 (AC F25.115J)]

9. In disclosing the fair value of a derivative financial instrument, does the plan not:
   a. Combine, aggregate, or net the fair value with the fair value of a nonderivative financial instrument? ___ __ ___
   b. Net the fair value with the fair value of other derivative financial instruments? [SFAS 107, par. 13, as amended by SFAS 119, par. 15d (AC F25.115I)]

<table>
<thead>
<tr>
<th>Practice Tip</th>
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<tbody>
<tr>
<td>In certain situations, offsetting may be permitted under FASB 39, <em>Offsetting of Amounts Related to Certain Contracts</em>, as modified by FASB 41, <em>Offsetting of Amounts Related to Certain Repurchase and Reverse Repurchase Agreements</em>.</td>
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10. For options held and other derivative financial instruments not within the scope of SFAS 105 (because they do not have off-balance-sheet risk of accounting loss), are the following disclosures made by category of financial instrument:
   a. The face or contract amount (or notional principal amount if there is no face or contract amount)?* ___ ___ ___
   b. The nature and terms, including, at a minimum, a discussion of:
      (1) Credit and market risk of the instruments? ___ ___ ___
      (2) Cash requirements of the instruments? ___ ___ ___
      (3) Related accounting policy as required by APB 22? ___ ___ ___

11. Do disclosures in Steps 10.a. and 10.b. above distinguish between financial instruments held or issued for:
   a. Trading purposes, including dealing and other trading activities measured at fair value with gains and losses recognized in earnings? ___ ___ ___
   b. Purposes other than trading? [SFAS 119, pars. 8 and 9 (AC F25.115L and .115M)]

12. If the plan holds or issues derivative financial instruments for trading purposes, are the following disclosed:
   a. The average fair value of those derivative financial instruments during the reporting period presented together with the related end-of-period fair value, distinguishing between assets and liabilities? ___ ___ ___
   b. The net gains or losses (net trading revenue) arising from trading activities during the reporting period disaggregated by class, business activity, risk or other category consistent with management of those activities and where those net trading gains or losses are reported in the “Statement of Changes in Net Assets Available for Benefits”? ___ ___ ___

* Unless, as described in footnote 2 of SFAS 119, the disclosure of the face or contract amount would be misleading because the instruments are leveraged and the leverage features are not adequately disclosed.
(1) If the disaggregation is other than by class, are the classes of derivative financial instruments, other financial instruments, and nonfinancial assets and liabilities from which the net trading gains and losses arose disclosed for each category? 

Yes | No | N/A
--- | --- | ---

**c. The average fair value for assets and liabilities from the trading of other types of financial instruments or nonfinancial assets (Encouraged, but not required.)?**  
[SFAS 119, par. 10 (AC F25.115N)]

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<th>Yes</th>
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13. If the plan holds or issues derivative financial instruments for purposes other than trading, are the following disclosed:

a. A description of:

   (1) The objectives for holding or issuing? 

   (2) The context needed to understand those objectives? 

   (3) The strategies for achieving those objectives? 

   (4) The classes of derivative financial instruments used?

b. A description of how each class of derivative financial instrument is reported in the financial statements, including:

   (1) The policies for recognition and measurement or nonrecognition of the derivative financial instruments?

   (2) When recognized, where the instruments and related gains and losses are reported?

   (3) For derivative financial instruments that are held or issued and accounted for as hedges of anticipated transactions, both firm and forecasted transactions for which there is no firm commitment, including:

      (1) A description of the anticipated transactions whose risks are hedged, including the expected time period of occurrence?

      (2) A description of the classes of derivative financial instruments used to hedge?

      (3) The amount of explicitly deferred hedging gains and losses?

      (4) A description of the transactions or events that result in the recognition in earnings of the deferred gains or losses?  

   [SFAS 119, par. 11 (AC F25.115O)]

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14. Is quantitative information about the following considered for disclosure (Encouraged, but not required.):

a. Interest rate? 

b. Foreign exchange? 

c. Commodity price?

d. Other market risks consistent with management's strategies?

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<th>Yes</th>
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e. Information about the risks of other financial instruments or non-financial assets and liabilities to which the derivative financial instruments are related?  
[SFAS 119, pars. 12 and 13 (AC F25.115P and .115Q)]

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<th>Yes</th>
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Practice Tip

Suggested methods of disclosure of this quantitative information about risks of derivative financial instruments include:

a. Additional details about current positions and period activity.

b. Hypothetical effects on equity or on annual income of several possible changes in market prices.

c. Gap analysis of interest rate repricing or maturity dates.

d. Duration of financial instruments.

e. The plan's value at risk from derivative financial instruments and other positions at period end and the average value at risk during the year.

f. Any other helpful informative disclosures.

[SFAS 119, par. 13 (AC F25.115Q)]

G. Income Tax Status

1. If a favorable letter of determination has not been obtained or maintained, is the federal income tax status of the plan disclosed?7

   [SFAS 35, par. 28f (AC Pe5.127f); AAG, par. 2.26f]

H. Plan Terminations

1. If a decision is made to terminate the plan, are all relevant circumstances disclosed?

   [AAG, par. 2.41]

2. If a decision is made to terminate the plan before the date of the plan financial statements, have all benefits been determined on a liquidation basis and reported as vested?

   [AAG, par. 2.42]

I. Related-Party Transactions

1. For related-party transactions, do disclosures include:

   a. The nature of the relationships involved?

   b. For each period for which a statement of changes in net assets is presented:

      (1) A description of the transactions, including transactions to which no amounts or nominal amounts were ascribed?

      (2) Other information deemed necessary to gain an understanding of the effects of the transactions on the financial statements?

      (3) The dollar amount of transactions?

      (4) The effects of any changes in the method of establishing the terms from that used in the preceding period?

   c. Amounts due from or to related parties as of the date of each "Statement of Net Assets Available for Benefits" presented and, if not otherwise apparent, the terms and manner of settlement?

   [SFAS 57, pars. 2-4 (AC R36.102–104)]

2. Is the nature of a controlled relationship disclosed (even if there are no transactions between the entities) if the plan and one or more other

7 Reports filed in accordance with the requirements of ERISA must include disclosure of "information concerning whether or not a tax ruling or determination letter has been obtained," which is more than is required by SFAS 35, as amended. [AAG, par. 2.26f]
entities are under common ownership or management control, and the existence of the control could result in operating results or financial position of the plan being significantly different from those that would have resulted if the plan were autonomous? [SFAS 57, pars. 2–4 (AC R36.102–.104)]

3. If representations about transactions with related parties are made, do they avoid the implication that the related party transactions were consummated at arm’s length, or if such implications are made, can they be substantiated? [SFAS 57, par. 3 (AC R36.103)]

4. Are the nature and extent of leasing transactions with related parties appropriately disclosed? [SFAS 13, par. 29 (AC L10.125)]

5. Do the financial statements include a description of any agreements and transactions with persons known to be parties-in-interest? [AAG, par. 2.26h and App. A, par. A.51c]

Practice Tip
ERISA defines a party-in-interest generally as any fiduciary or employee of the plan, any person who provides services to the plan, an employer whose employees are covered by the plan, an employee organization whose members are covered by the plan, a person who owns 50 percent or more of such an employer or employee association, or relatives of a person described above. [AAG, par. 11.01 and App. A, par. A.85, fn. 103; ERISA section 3(14)]

J. Subsequent Events

1. Are the financial statements adjusted for any changes in estimates resulting from subsequent events that provide additional evidence about conditions that existed at the date of the “Statement of Net Assets Available for Benefits”? [SFAS 5, par. 8 (AC C59.105); SAS 1, sec. 560.03, .04, and .07 (AU 560.03,.04, and .07)]

2. Are subsequent events that provide evidence about conditions that did not exist at the date of the “Statement of Net Assets Available for Benefits,” but arose subsequent to that date, adequately disclosed? [SFAS 5, par. 11 (AC C59.112); SAS 1, sec. 560.05-.07, and .09 (AU 560.05-.07, and .09); AAG, pars. 2.26i and 2.42]

3. Do disclosures include any unusual or infrequent events or transactions occurring after the latest benefit information date, but before the issuance of the financial statements, that might significantly affect the usefulness of the financial statements in assessing the plan’s present and future ability to pay benefits? [SFAS 35, par. 28i (AC Pe5.127i)]

4. For those unusual or infrequent events or transactions identified in Step 3 above, do disclosures include the effects of such events or transactions, if reasonably determinable, or the reasons why such effects are not reasonably determinable? [SFAS 35, par. 28i (AC Pe5.127i)]

8 Also consider the appropriateness of dual dating the auditor’s report for the subsequent event. [SAS 1, sec. 530.05 (AU 530.05)]
K. Other Matters

1. Do disclosures include the funding policy of the pension plan and any changes in such policy during the plan year?
   [SFAS 35, par. 28d, fn. 17 (AC Pe5.127d); AAG, par. 2.26d]
   a. If significant costs of plan administration are being absorbed by the employer, is this fact disclosed?
   [SFAS 35, par. 28d, fn. 17 (AC Pe5.127d, fn. 22)]
   b. For a contributory plan, does the disclosure on funding policy state the method of determining the participants' contributions?
   [SFAS 35, par. 28d (AC Pe5.127d); AAG, par. 2.26d]
   c. For ERISA plans, do disclosures include whether the minimum funding requirements of ERISA are met?
   [SFAS 35, par. 28d (AC Pe5.127d); AAG, par. 2.26d]
   d. If a minimum funding waiver has been granted by the IRS or if a request for a waiver is pending before the IRS, is this fact disclosed?
   [SFAS 35, par. 28d (AC Pe5.127d)]
   e. Does the plan include a brief description of how contributions are determined pursuant to the actuarial cost method?
   [SFAS 35, par. 262 (AC Pe5.127d)]
   f. Did the plan disclose information regarding the estimated future impact of the funding policy on an existing difference between the net asset and benefit information?
   [SFAS 35, par. 263 (AC Pe5.127d)]

2. Do disclosures include the policy regarding the purchase of insurance contracts that are excluded from plan assets and the income from those contracts?
   [SFAS 35, par. 28e (AC Pe5.127e); AAG, par. 2.26e]

3. Do disclosures include significant real estate or other transactions in which the plan and any of the following parties are jointly involved: (a) the sponsor, (b) the employer(s), or (c) the employee organization(s)?
   [See also section I, Related-Party Transactions, regarding parties-in-interest]
   [SFAS 35, par. 28h (AC Pe5.127h); AAG, par. 2.26h]

ERISA Reporting Requirements

A. Form 5500 Series Report

1. Did plans with 100 or more participants at the beginning of the plan year file an annual report (Form 5500) containing financial statements prepared in accordance with either GAAP or an other comprehensive basis of accounting (OCBOA), such as the cash basis or modified cash basis of accounting, separate schedules, notes (required for a full and fair presentation), and an independent public accountant's report prepared under generally accepted auditing standards?
   [AAG, par. 13.20 and App. A, par. A.18]

Practice Tip

Pursuant to DOL Regulation 29 CFR 2520.103-1(d), a plan that covers between 80 and 120 participants at the beginning of the plan year may elect to file the same report that was filed the previous year. Plans that file the Form 5500-C/R pursuant to the 80/120 rule are not required to have an audit of their financial statements. [ref: DOL Reg. 29 CFR 2520.104-46]
B. Financial Statement Disclosures Required Under the Alternative Method of Compliance for Pension Plans Pursuant to DOL Regulations Section CFR 2520.103 and Section 103 of ERISA

1. If the financial statements of the pension plan are filed under the "alternative method" pursuant to DOL Regulations Sec. 2520.103-1(a)(2), do the disclosures in the financial statements include:
   
a. A description of accounting principles and variances from GAAP? __________

b. A description of the plan, including significant changes in the plan, and the effect of the changes on benefits? __________

c. The funding policy and changes in the funding policy from the prior year? __________

d. A description of material lease commitments, and other commitments and contingent liabilities? __________

e. A description of any agreements and transactions with persons known to be parties-in-interest? __________

f. A general description of priorities in the event of plan termination? __________

g. Whether a tax ruling or determination letter has been obtained? __________

h. An explanation of any differences between the separate financial statements and the financial information required on Form 5500? __________

[AAG, App. A, par. A.51c]

C. Required Financial Statements and Supporting Schedules

1. For plans filing under either method, are the following financial statements included and covered by the auditor's report:
   
a. Statement of plan assets and liabilities by category at fair value and in comparative form for the beginning and end of the plan year? __________

b. Separate or combined statements of plan income and expenses and of changes in net assets? __________

[AAG, App. A, par. A.51a]

2. Pursuant to DOL regulations, are the following separate schedules included with the financial statements of the plan and covered by the auditor's report:

Practice Tip

The instructions to the Form 5500 provide specific information as to the form and content of the various schedule requirements.

a. Assets held for investment purposes (if filing under the alternative method, a separate schedule of assets held at plan year-end and a schedule of certain assets acquired and disposed of within the plan year), showing separate disclosure of the net realized gain or loss on sales of securities and the net unrealized appreciation (depreciation) of investments held?

(1) Is the schedule clearly labeled "Line 27a—Schedule of Assets Held for Investment Purposes"? __________

b. Loans or fixed income obligations that are in default or uncollectible?

(1) Is the schedule clearly labeled "Line 27b—Schedule of Loans or Fixed Income Obligations"? __________
<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>c. Leases in default or uncollectible?</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(1) Is the schedule clearly labeled “Line 27c—Schedule of Leases in Default or Classified as Uncollectible”?</td>
<td></td>
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<tr>
<td><strong>d. Reportable transactions, including all individual security transactions that exceed 5 percent (regulations)(^9) of the fair value of plan assets at the beginning of the year?</strong></td>
<td></td>
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<tr>
<td>(1) Is the schedule clearly labeled “Line 27d—Schedule of Reportable Transactions”?</td>
<td></td>
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<tr>
<td><strong>e. Non-exempt transactions with parties-in-interest?</strong></td>
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<tr>
<td>(1) Is the schedule clearly labeled “Line 27e—Schedule of Non-exempt Transactions” and/or “Line 27f—Schedule of Non-exempt Transactions”?</td>
<td></td>
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</tbody>
</table>

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\(^9\) Three percent statute.
FSP Section 7300
Auditors’ Report Checklist

.01 This checklist has been developed by the staff of the Accounting and Auditing Publications Team of the AICPA as a nonauthoritative practice aid.

.02 Explanation of References:
AAG = AICPA Audit and Accounting Guide Audits of Employee Benefit Plans (with conforming changes as of May 1, 1998)
SAS = AICPA Statement on Auditing Standards
AU = Reference to section number in AICPA Professional Standards (vol. 1)
SSARS = AICPA Statement on Standards for Accounting and Review Services
AR = Reference to section number in AICPA Professional Standards (vol. 2)
DOL = Department of Labor
CFR = Code of Federal Regulations

.03 Checklist Questionnaire:

1. Is each financial statement audited, specifically identified in the introductory paragraph of the auditor’s report? ____ ____ ____
   [SAS 58, par. 6 (AU 508.06)]

2. Do the titles of the financial statements referred to in the introductory paragraph of the auditor’s report match the titles of the financial statements presented? ____ ____ ____
   [Generally Accepted]

3. Do the dates of the financial statements referred to in the introductory paragraph of the auditor’s report match the dates of the financial statements presented? ____ ____ ____
   [Generally Accepted]

4. Is the report appropriately addressed? ____ ____ ____
   [SAS 58, par. 9 (AU 508.09)]

5. Does the auditor’s report include:
   a. A title that includes the word “independent”? ____ ____ ____
      [SAS 58, par. 8a (AU 508.08a)]
   b. A statement that the financial statements identified in the report were audited? ____ ____ ____
      [SAS 58, par. 8b (AU 508.08b)]
   c. A statement that the financial statements are the responsibility of management and that the auditor’s responsibility is to express an opinion on the financial statements based on his or her audit? ____ ____ ____
      [SAS 58, par. 8c (AU 508.08c)]
<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>d. A statement that the audit was conducted in accordance with generally accepted auditing standards?</td>
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<tr>
<td></td>
<td>[SAS 58, par. 8d (AU 508.08d)]</td>
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<tr>
<td>e. A statement that generally accepted auditing standards require that the auditor plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement?</td>
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<tr>
<td></td>
<td>[SAS 58, par. 8e (AU 508.08e)]</td>
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<tr>
<td>f. A statement that an audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements; assessing the accounting principles used and significant estimates made by management; and evaluating the overall financial statement presentation?</td>
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<tr>
<td></td>
<td>[SAS 58, par. 8f (AU 508.08f)]</td>
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</tr>
<tr>
<td>g. A statement that the auditor believes that his or her audit provides a reasonable basis for his or her opinion?</td>
<td></td>
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</tr>
<tr>
<td></td>
<td>[SAS 58, par. 8g (AU 508.08g)]</td>
<td></td>
<td></td>
</tr>
<tr>
<td>h. An opinion as to whether the financial statements present fairly, in all material respects, the financial position of the reporting entity as of the balance sheet date and the results of its operations and its cash flows for the period then ended in conformity with generally accepted accounting principles?</td>
<td></td>
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<tr>
<td></td>
<td>[SAS 58, par. 8h (AU 508.08h)]</td>
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<tr>
<td>i. The manual or printed signature of the auditor's firm?</td>
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<tr>
<td></td>
<td>[SAS 58, par. 8i (AU 508.08i)]</td>
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<tr>
<td>j. The date (or dual dates) of the audit report?</td>
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<tr>
<td></td>
<td>[SAS 58, par. 8j (AU 508.08j)]</td>
<td></td>
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</tr>
</tbody>
</table>

**Practice Tip**

DOL Regulations require the auditor's report to be dated and manually signed and to identify the city and state where issued.

6. If a subsequent event disclosed in the financial statements occurs after completion of field work but before the issuance of the auditor's report, has the need for dual-dating of the report been considered?  
   [SAS 1, sec. 530, pars. 3–5 (AU 530.03–.05)]

7. If the auditor is not independent, is a compilation report indicating the lack of independence issued?  
   [SAS 26, par. 10 (AU 504.10); SSARS 1, pars. 22 and 38 (AR 100.22 and .38)]

8. Does the report include appropriate language for the following situations:
   a. Only one basic financial statement is presented and there are no scope limitations?  
      [SAS 58, pars. 33 and 34 (AU 508.33 and .34)]
   b. Audited and unaudited financial statements are presented in comparative form?  
      [SAS 26, pars. 14–17 (AU 504.14–.17)]
   c. The financial statements of the plan contain supplemental schedules relating to ERISA and DOL Regulations?  
      [AAG, pars. 13.10–13.19]
Practice Tip

The Guide includes additional auditor reports with respect to "financial statements of a trust" and "inadequate procedures to value investments." [AAG, pars. 13.30 and 13.35]

Explanatory Paragraphs

9. If the opinion is based in part on the report of another auditor:
   a. Does the introductory paragraph of the standard report disclose the fact that the opinion is based, in part, on the report of other auditors? __ __ __
   b. Does the opinion paragraph include a reference to the report of the other auditor? __ __ __
   [SAS 58, pars. 11a, 12, and 13 (AU 508.11a, .12, and .13)]

10. If, to prevent the financial statements from being misleading because of unusual circumstances, the financial statements contain a departure from an accounting principle promulgated by a body designated by the AICPA Council to establish such principles, does the report include, in a separate paragraph or paragraphs, the information required by the rule? __ __ __
   [SAS 58, pars. 11b and 15 (AU 508.11b and .15)]

11. If there is substantial doubt about the entity’s ability to continue as a going concern:
   a. Does the report include an explanatory paragraph, following the opinion paragraph, to reflect that conclusion? __ __ __
   b. Is that conclusion expressed through the use of the phrase “substantial doubt about its (the entity’s) ability to continue as a going concern” or similar wording that includes the terms substantial doubt and going concern? __ __ __
   [SAS 58, par. 11c (AU 508.11c); SAS 59, as amended by SAS 64, par. 12 (AU 541.12)]

Practice Tip

In a going concern paragraph, the auditor should not use conditional language in expressing a conclusion concerning the existence of substantial doubt about the entity’s ability to continue as a going concern. See SAS 77 for an example. [SAS 59, as amended by SAS 64 and SAS 77, par. 13]

12. If there has been a material change between periods in accounting principles or in the method of their application that has a material effect on the comparability of the reporting entity’s financial statements:
   a. Does the report include an explanatory paragraph, following the opinion paragraph, that refers to the change? __ __ __
   b. Does the explanatory paragraph identify the nature of the change and refer the reader to the note to the financial statements that discusses the change in detail? __ __ __
   [SAS 58, as amended by SAS 79, pars. 11d and 16 (AU 508.11d and .16)]

Practice Tip

Changes in the format of presentation of accumulated benefit information or a change in the date as of which such information is presented does not require the auditor to add an explanatory paragraph to his or her report. [AU 9420.64 and .65; AAG, par. 13.24]
13. In an updated report, the opinion is different from the opinion previously expressed on the financial statements of a prior period:
   a. Does the report include an explanatory paragraph, preceding the opinion paragraph, that discloses all of the substantive reasons for the different opinion?
   
   b. Does the explanatory paragraph disclose:
      (1) The date of the auditor's previous report?
      (2) The type of opinion previously expressed?
      (3) The circumstances or events that caused the auditor to express a different opinion?
      (4) That the auditor's updated opinion on the financial statements of the prior period is different from his or her previous opinion on those statements?
      [SAS 58, as amended by SAS 79, pars. 11e and 69 (AU 508.11e and .69)]

14. If financial statements of a prior period (presented for comparative purposes) have been audited by a predecessor auditor whose report is not presented:
   a. Does the introductory paragraph of the report indicate:
      (1) That the financial statements of the prior period were audited by another auditor?
      (2) The date of the predecessor auditor's report?
      (3) The type of report issued by the predecessor auditor?
      (4) If the report was other than a standard report, the substantive reasons therefor, including a description of the nature of and reasons for the explanatory paragraph added to the predecessor's report or his or her opinion qualification?
   b. If the financial statements have been restated, does the introductory paragraph indicate that the predecessor auditor reported on the financial statements of the prior period before restatement?
      [SAS 58, as amended by SAS 79, pars. 11e and 74 (AU 508.11e and .74)]

15. If supplementary information required by the FASB has been omitted, the presentation of such information departs materially from FASB guidelines, the auditor is unable to complete prescribed procedures with respect to such information, or the auditor is unable to remove substantial doubt about whether the supplementary information conforms to FASB guidelines, does the report include an additional paragraph stating that fact?
      [SAS 58, par. 11g (AU 508.11g); SAS 52, par. 8 (AU 558.08)]

16. If other information in a document containing audited financial statements is materially inconsistent with information appearing in the financial statements, has it been determined whether the financial statements, the auditor's report, or both require revision?
      [SAS 58, par. 11h (AU 508.11h); SAS 8, par. 4 (AU 550.04)]

17. If the auditor decides to emphasize a matter regarding the financial statements in the report, is the explanatory information presented in
a separate paragraph that avoids use of phrases such as “with the foregoing (following) explanation”? [SAS 58, pars. 11 and 19, as amended by SAS 79 (AU 508.11 and .19); Interpretation 3 of SAS 1, sec. 410 (AU 9410.18); Interpretation 1 of SAS 57 (AU 9342.03)]

**Practice Tip**
DOL Regulation section CFR 2520 requires that the auditor separately identify any exceptions to his or her report that are the result of DOL Regulations.

**Departures From Unqualified Opinions**

18. If it has not been possible to conduct the audit in accordance with GAAS or to apply all of the procedures considered necessary in the circumstances, has consideration been given to the need to issue a qualified opinion or to disclaim an opinion? [SAS 58, as amended by SAS 79, par. 22 (AU 508.22)]

19. If a qualified opinion is to be expressed because of a scope limitation:
   a. Are all of the substantive reasons for the qualification disclosed in one or more explanatory paragraphs preceding the opinion paragraph? [SAS 58, as amended by SAS 79, pars. 22–27 (AU 508.22–.27)]
   b. Does the qualified opinion include the word *except* or *exception* in a phrase such as *except for* or *with the exception of*?
   c. Is the situation described and referred to in both the scope and opinion paragraphs?
   d. Does the wording in the opinion paragraph indicate that the qualification pertains to the possible effects on the financial statements and not the scope limitation itself?

**Practice Tips**
Scope limitations include situations in which the auditor is unable to obtain sufficient evidential matter to support management’s assertions about the nature of a matter involving an uncertainty and its presentation or disclosure in the financial statements. [SAS 58, as amended by SAS 79, par. 31]
Consult the Topical Index to the AICPA *Professional Standards* under “Scope of Audit—Limitations” for additional references to specific types of scope limitations that could result in either a qualified or disclaimer of opinion.

20. If an opinion is disclaimed because of a scope limitation:
   a. Are all of the substantive reasons for the disclaimer stated in a separate paragraph or paragraphs?
   b. Does the report state that the scope of the audit was not sufficient to warrant the expression of an opinion?
   c. Does the report avoid identifying procedures that were performed?
   d. Is the scope paragraph omitted?
e. If there are reservations about fair presentation of the financial statements in conformity with GAAP, are they described in the report?  
[SAS 58, as amended by SAS 79, par. 63 (AU 508.63)]

21. If the financial statements are materially affected by a departure from GAAP (including inadequate disclosure, inappropriate accounting principles, and unreasonable accounting estimates), has consideration been given to the need to issue a qualified opinion or an adverse opinion?  
[SAS 58, as amended by SAS 79, par. 35 (AU 508.35)]

22. If a qualified opinion is to be expressed because of a GAAP departure:
   a. Are all of the substantive reasons that have led to the conclusion that there is a departure from GAAP disclosed in one or more separate explanatory paragraphs preceding the opinion paragraph?  
   [SAS 58, as amended by SAS 79, pars. 37 and 38 (AU 508.37 and .38)]
   b. Does the qualified opinion include the word except or exception in a phrase such as except for or with the exception of and a reference to the explanatory paragraph?  
   c. Does the explanatory paragraph disclose the principle effects of the departure on financial position, results of operations, and cash flows, if practicable, or state that the effects are not reasonably determinable, if not practicable to do so?

23. If an adverse opinion is to be expressed because of a GAAP departure:
   a. Are all of the substantive reasons for the adverse opinion disclosed in one or more separate explanatory paragraphs preceding the opinion paragraph?  
   b. Does the explanatory paragraph disclose the principle effects of the departure on financial position, results of operations, and cash flows, if practicable, or state that the effects are not reasonably determinable, if not practicable to do so?
   c. State that the financial statements do not present fairly the financial position, or results of operations or cash flows in conformity with GAAP?  
   [SAS 58, as amended by SAS 79, pars. 58 and 59 (AU 508.58 and .59)]

24. If a limited scope audit is performed pursuant to DOL Regulations 29 CFR section 2520.103-8, is a disclaimer of opinion expressed?  
[AAG, pars. 13.26–13.30]

Practice Tip
Consult the Topical Index to the AICPA Professional Standards under “Departures from Established Principles,” “Adverse Opinions,” and “Qualified Opinions” for additional references to specific types of GAAP departures that could result in either a qualified or adverse opinion.

1 The auditor should express a qualified or an adverse opinion if the auditor concludes that (a) a matter involving a risk or an uncertainty is not adequately disclosed, (b) the accounting principles used cause the financial statements to be materially misstated when the inability to make a reasonable estimate raises questions about the appropriateness of the accounting principles used, and (c) management’s estimate is unreasonable and that its effect is to cause the financial statements to be materially misstated. [SAS 58, as amended by SAS 70, pars. 46–49]
25. If information accompanies the basic financial statements and auditor’s report in an auditor-submitted document, does the report on the accompanying information:

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>a.</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>b.</td>
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<td></td>
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<tr>
<td>c.</td>
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<tr>
<td>d.</td>
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<td></td>
<td></td>
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<tr>
<td>e.</td>
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</tbody>
</table>

[SAS 29, pars. 6-11 (AU 551.06-.11)]

**Practice Tip**

Step 25 above does not apply to limited-scope audits pursuant to DOL Regulations 29 CFR section 2520.103-8. In these situations, see Step 24 above and AAG, paragraph 13.26.

26. Auditor’s report requirements under DOL regulations:

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
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<tbody>
<tr>
<td>a.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>b.</td>
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<td>c.</td>
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<td>d.</td>
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<td>e.</td>
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<tr>
<td>f.</td>
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</table>

[29 CFR 2520.103-1(iv)]

(1) Are the exceptions, if any, further identified as (a) those that are the result of DOL regulations, and (b) all others?


<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>g.</td>
<td></td>
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</table>

FSP Section 7400

Illustrative Financial Statements and Auditor’s Reports

.01 This section contains illustrations of the following auditor’s reports:

- Defined benefit plan assuming end-of-year benefit information date
- Defined benefit plan assuming beginning-of-year benefit information date
- Defined benefit plan—limited-scope audit

.02 This section also illustrates certain applications of the provisions of chapter 2 of the Audit and Accounting Guide Audits of Employee Benefit Plans (the Guide), that apply for the annual financial statements of the hypothetical pension plan, C&H Company Pension Plan. It does not illustrate other provisions of chapter 2 of the Guide that might apply in circumstances other than those assumed in this example. The format presented and the wording of accompanying notes are only illustrative and are not necessarily the only possible presentations.

.03 Although generally accepted accounting principles (GAAP) do not require comparative financial statements, ERISA requires a comparative statement of net assets available for benefits. The illustrative financial statements are intended to comply with the ERISA requirements for comparative statements.

.04 ERISA and DOL regulations require that certain information be included in supplemental schedules, which are not required under GAAP, and reported on by the independent auditor.
Illustration of Auditors' Report on Financial Statements of a Defined Benefit Plan Assuming End-of-Year Benefit Information Date

Independent Auditors' Report

[Addressee]

We have audited the accompanying statements of net assets available for benefits and of accumulated plan benefits of XYZ Pension Plan as of December 31, 19X2 and 19X1, and the related statements of changes in net assets available for benefits and of changes in accumulated plan benefits for the year ended December 31, 19X2. These financial statements are the responsibility of the Plan's management. Our responsibility is to express an opinion on these financial statements based on our audits.

We conducted our audits in accordance with generally accepted auditing standards. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. We believe that our audits provide a reasonable basis for our opinion.

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial status of the Plan as of December 31, 19X2 and 19X1, and the changes in its financial status for the year ended December 31, 19X2, in conformity with generally accepted accounting principles.

Our audits were performed for the purpose of forming an opinion on the basic financial statements taken as a whole. The supplemental schedules of [identify] are presented for the purpose of additional analysis and are not a required part of the basic financial statements but are supplementary information required by the Department of Labor's Rules and Regulations for Reporting and Disclosure under the Employee Retirement Income Security Act of 1974. These supplemental schedules are the responsibility of the Plan's management. The supplemental schedules have been subjected to the auditing procedures applied in the audits of the basic financial statements and, in our opinion, are fairly stated in all material respects in relation to the basic financial statements taken as a whole.¹

[Signature of Firm]

[City and State]

[Date]

[AAG, pars. 13.04, 13.11, and 13.12]

¹ This paragraph on the supplemental schedules required by ERISA and DOL regulations may also be shown separately in the auditor-submitted document.
Illustration of Auditors' Report on Financial Statements of a Defined Benefit Plan Assuming Beginning-of-Year Benefit Information Date

Independent Auditors' Report

[Addressee]

We have audited the accompanying statements of net assets available for benefits of XYZ Pension Plan as of December 31, 19X2 and 19X1, and the related statements of changes in net assets available for benefits for the years then ended and the statement of accumulated plan benefits as of December 31, 19X1, and the related statement of changes in accumulated plan benefits for the year then ended. These financial statements are the responsibility of the Plan's management. Our responsibility is to express an opinion on these financial statements based on our audits.

We conducted our audits in accordance with generally accepted auditing standards. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. We believe that our audits provide a reasonable basis for our opinion.

In our opinion, the financial statements referred to above present fairly, in all material respects, information regarding the Plan's net assets available for benefits as of December 31, 19X2, and changes therein for the year then ended and its financial status as of December 31, 19X1, and changes therein for the year then ended in conformity with generally accepted accounting principles.

Our audits were performed for the purpose of forming an opinion on the basic financial statements taken as a whole. The supplemental schedules of [identify] are presented for the purpose of additional analysis and are not a required part of the basic financial statements but are supplementary information required by the Department of Labor's Rules and Regulations for Reporting and Disclosure under the Employee Retirement Income Security Act of 1974. These supplemental schedules are the responsibility of the Plan's management. The supplemental schedules have been subjected to the auditing procedures applied in the audits of the basic financial statements and, in our opinion, are fairly stated in all material respects in relation to the basic financial statements taken as a whole.2

[Signature of Firm]

[City and State]

[Date]

[AAG, pars. 13.05, 13.11, and 13.12]

---

2 This paragraph on the supplemental schedules required by ERISA and DOL regulations may also be shown separately in the auditor-submitted document.
Illustration of Auditors' Report on Financial Statements—Limited-Scope Audits Under DOL Regulations

Independent Auditors' Report

[Addressee]

We were engaged to audit the financial statements and supplemental schedules of XYZ Pension Plan as of December 31, 19X1 and 19X0, and for the year ended December 31, 19X1, as listed in the accompanying index. These financial statements and schedules are the responsibility of the Plan's management.

As permitted by 29 CFR 2520.103-8 of the Department of Labor's Rules and Regulations for Reporting and Disclosure under the Employee Retirement Income Security Act of 1974, the plan administrator instructed us not to perform, and we did not perform, any auditing procedures with respect to the information summarized in Note X, which was certified by ABC Bank, the trustee (or custodian) of the Plan, except for comparing such information with the related information included in the financial statements and supplemental schedules. We have been informed by the plan administrator that the trustee (or custodian) holds the Plan's investment assets and executes investment transactions. The plan administrator has obtained a certification from the trustee (or custodian) as of and for the years ended December 31, 19X1 (and 19X2), that the information provided to the plan administrator by the trustee (or custodian) is complete and accurate.

Because of the significance of the information that we did not audit, we are unable to, and do not express an opinion on the accompanying financial statements and schedules taken as a whole. The form and content of the information included in the financial statements and schedules, other than that derived from the information certified by the trustee or custodian, have been audited by us in accordance with generally accepted auditing standards and, in our opinion, are presented in compliance with the Department of Labor's Rules and Regulations for Reporting and Disclosure under the Employee Retirement Income Security Act of 1974.

[Signature of Firm]

[City and State]

[Date]

[AAG, par. 13.26]
The checklists and illustrative financial statements do not include all disclosures and presentation items promulgated.

C&H COMPANY PENSION PLAN

Statements of Net Assets Available for Benefits
[End-of-year benefit information date]

<table>
<thead>
<tr>
<th>December 31</th>
<th>19X1</th>
<th>19X0</th>
</tr>
</thead>
<tbody>
<tr>
<td>Assets</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Investments, at fair value (Notes B, E, F, and G):</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Plan interest in C&amp;H Master Trust</td>
<td>$2,250,000</td>
<td>$1,860,000</td>
</tr>
<tr>
<td>C&amp;H Company common stock</td>
<td>690,000</td>
<td>880,000</td>
</tr>
<tr>
<td>Investment contract with insurance company</td>
<td>1,000,000</td>
<td>890,000</td>
</tr>
<tr>
<td>Corporate bonds and debentures</td>
<td>3,500,000</td>
<td>3,670,000</td>
</tr>
<tr>
<td>U.S. government securities</td>
<td>350,000</td>
<td>270,000</td>
</tr>
<tr>
<td>Mortgages</td>
<td>480,000</td>
<td>460,000</td>
</tr>
<tr>
<td>Real estate</td>
<td>270,000</td>
<td>240,000</td>
</tr>
<tr>
<td>Total investments</td>
<td>8,540,000</td>
<td>8,270,000</td>
</tr>
<tr>
<td>Receivables:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Employer’s contribution</td>
<td>40,000</td>
<td>35,000</td>
</tr>
<tr>
<td>Securities sold</td>
<td>310,000</td>
<td>175,000</td>
</tr>
<tr>
<td>Accrued interest and dividends</td>
<td>77,000</td>
<td>76,000</td>
</tr>
<tr>
<td>Total receivables</td>
<td>427,000</td>
<td>286,000</td>
</tr>
<tr>
<td>Cash</td>
<td>200,000</td>
<td>90,000</td>
</tr>
<tr>
<td>Total assets</td>
<td>9,167,000</td>
<td>8,646,000</td>
</tr>
<tr>
<td>Liabilities</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Due to broker for securities purchased</td>
<td>—</td>
<td>400,000</td>
</tr>
<tr>
<td>Accounts payable</td>
<td>70,000</td>
<td>60,000</td>
</tr>
<tr>
<td>Accrued expenses</td>
<td>85,000</td>
<td>40,000</td>
</tr>
<tr>
<td>Total liabilities</td>
<td>155,000</td>
<td>500,000</td>
</tr>
<tr>
<td>Net assets available for benefits</td>
<td>$9,012,000</td>
<td>$8,146,000</td>
</tr>
</tbody>
</table>

The accompanying notes are an integral part of the financial statements.
C&H COMPANY PENSION PLAN

Statement of Changes in Net Assets Available for Benefits
[End-of-year benefit information date]

<table>
<thead>
<tr>
<th>Year Ended</th>
<th>December 31, 19X1</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Investment income</strong></td>
<td></td>
</tr>
<tr>
<td>Net appreciation in fair value of investments (Note E)</td>
<td>$ 278,000</td>
</tr>
<tr>
<td>Interest</td>
<td>325,000</td>
</tr>
<tr>
<td>Dividends</td>
<td>5,000</td>
</tr>
<tr>
<td><strong>Less investment expenses</strong></td>
<td>608,000</td>
</tr>
<tr>
<td>Plan interest in C&amp;H Master Trust investment income (Note F)</td>
<td>569,000</td>
</tr>
<tr>
<td><strong>Plan interest in C&amp;H Master Trust investment income (Note F)</strong></td>
<td>698,000</td>
</tr>
<tr>
<td><strong>Contributions (Note C)</strong></td>
<td></td>
</tr>
<tr>
<td>Employer</td>
<td>780,000</td>
</tr>
<tr>
<td>Employees</td>
<td>450,000</td>
</tr>
<tr>
<td><strong>Total additions</strong></td>
<td>1,230,000</td>
</tr>
<tr>
<td>Benefits paid directly to participants</td>
<td>740,000</td>
</tr>
<tr>
<td>Purchases of annuity contracts (Note G)</td>
<td>257,000</td>
</tr>
<tr>
<td><strong>Purchases of annuity contracts (Note G)</strong></td>
<td>997,000</td>
</tr>
<tr>
<td><strong>Administrative expenses</strong></td>
<td>65,000</td>
</tr>
<tr>
<td><strong>Total deductions</strong></td>
<td>1,062,000</td>
</tr>
<tr>
<td><strong>Net increase</strong></td>
<td>866,000</td>
</tr>
</tbody>
</table>

| **Net assets available for benefits** |                       |
| Beginning of year | 8,146,000 |
| End of year | $9,012,000 |

The accompanying notes are an integral part of the financial statements.

**Note:** Pursuant to SFAS 102, a statement of cash flows is not required for defined benefit pension plans covered by SFAS 35. However, plans are encouraged to include a statement of cash flows with their annual financial statements when that statement would provide relevant information about the ability of the plan to meet future obligations (e.g., when the plan invests in assets that are not highly liquid). [SFAS 102, par. 5]
C&H COMPANY PENSION PLAN

Statements of Accumulated Plan Benefits

[End-of-year benefit information date]

<table>
<thead>
<tr>
<th>December 31</th>
<th>19X1</th>
<th>19X0</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vested benefits:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Participants currently receiving payments</td>
<td>$3,040,000</td>
<td>$2,950,000</td>
</tr>
<tr>
<td>Other participants</td>
<td>8,120,000</td>
<td>6,530,000</td>
</tr>
<tr>
<td>Nonvested benefits</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total actuarial present value of accumulated plan benefits</td>
<td>$13,880,000</td>
<td>$11,880,000</td>
</tr>
</tbody>
</table>

The accompanying notes are an integral part of the financial statements.
C&H COMPANY PENSION PLAN
Statement of Changes in Accumulated Plan Benefits
[End-of-Year benefit information date]

Actuarial present value of accumulated plan benefits at beginning of year $11,880,000
Increase (decrease) during the year attributable to:
Plan amendment (Note H) 2,410,000
Change in actuarial assumptions (Note B) (1,050,500)
Benefits accumulated 895,000
Increase for interest due to the decrease in the discount period (Note B) 742,500
Benefits paid (997,000)
Net increase 2,000,000
Actuarial present value of accumulated plan benefits at end of year $13,880,000

The accompanying notes are an integral part of the financial statements.
C&H COMPANY PENSION PLAN

Notes to Financial Statements

A. Description of Plan

The following brief description of the C&H Company Pension Plan (Plan) is provided for general information purposes only. Participants should refer to the Plan agreement for more complete information.

1. General. The Plan is a defined benefit pension plan covering substantially all employees of C&H Company (Company). It is subject to the provisions of the Employee Retirement Income Security Act of 1974 (ERISA).

2. Pension Benefits. Employees with 5 or more years of service are entitled to annual pension benefits beginning at normal retirement age (65) equal to 1½% of their final 5-year average annual compensation for each year of service. The Plan permits early retirement at ages 55–64. Employees may elect to receive their pension benefits in the form of a joint and survivor annuity. If employees terminate before rendering 5 years of service, they forfeit the right to receive the portion of their accumulated plan benefits attributable to the Company's contributions. Employees may elect to receive the value of their accumulated plan benefits as a lump-sum distribution upon retirement or termination, or they may elect to receive their benefits as a life annuity payable monthly from retirement. For each employee electing a life annuity, payments will not be less than the greater of (a) the employee's accumulated contributions plus interest or (b) an annuity for five years.

3. Death and Disability Benefits. If an active employee dies at age 55 or older, a death benefit equal to the value of the employee's accumulated pension benefits is paid to the employee's beneficiary. Active employees who become totally disabled receive annual disability benefits that are equal to the normal retirement benefits they have accumulated as of the time they become disabled. Disability benefits are paid until normal retirement age at which time disabled participants begin receiving normal retirement benefits computed as though they had been employed to normal retirement age with their annual compensation remaining the same as at the time they became disabled.

B. Summary of Accounting Policies

The following are the significant accounting policies followed by the Plan:

1. Basis of Accounting. The accompanying financial statements are prepared on the accrual basis of accounting.

2. Use of Estimates. The preparation of financial statements in conformity with generally accepted accounting principles requires management to make estimates and assumptions that affect the reported amounts of assets, liabilities, and changes therein, disclosure of contingent assets and liabilities, and the actuarial present value of accumulated plan benefits at the date of the financial statements. Actual results could differ from those estimates.

3. Investment Valuation and Income Regulation. If available, quoted market prices are used to value investments.

The amounts shown in Note E for securities that have no quoted market price represent estimated fair value. Many factors are considered in arriving at that fair market value. In general, however, corporate bonds are valued based on yields currently available on com-
parable securities of issuers with similar credit ratings. Investments in certain restricted common stocks are valued at the quoted market price of the issuer's unrestricted common stock less an appropriate discount. If a quoted market price for unrestricted common stock of the issuer is not available, restricted common stocks are valued at a multiple of current earnings less an appropriate discount. The multiple chosen is consistent with multiples of similar companies based on current market prices.

Mortgages have been valued on the basis of their future principal and interest payments discounted at prevailing interest rates for similar investments. The fair value of real estate investments, principally rental property subject to long-term leases, has been estimated on the basis of future rental receipts and estimated residual values discounted at interest rates commensurate with the risks involved. The fair value of the Plan's interest in the C&H Master Trust (Master Trust) is based on the beginning of year value of the Plan's interest in the trust plus actual contributions and allocated investment income, less actual distributions and allocated administrative expenses (Note F). Quoted market prices are used to value investments in the Master Trust.

The Plan's investment contract with the National Insurance Company (National) (Note G) is valued at fair value by discounting the related cash flows based on current yields of similar instruments with comparable durations. Funds under the investment contract that have been allocated and applied to purchase annuities (that is, National is obligated to pay the related pension benefits) are excluded from the Plan's assets.

Purchases and sales of securities are recorded on a trade-date basis. Interest income is recorded on the accrual basis. Dividends are recorded on the ex-dividend date.

4. Actuarial Present Value of Accumulated Plan Benefits. Accumulated plan benefits are those future periodic payments, including lump-sum distributions, that are attributable under the Plan's provisions to the service employees have rendered. Accumulated plan benefits include benefits expected to be paid to (a) retired or terminated employees or their beneficiaries, (b) beneficiaries of employees who have died, and (c) present employees or their beneficiaries. Benefits under the Plan are based on employees' compensation during their last five years of credited service.

The accumulated plan benefits for active employees are based on their average compensation during the five years ending on the date as of which the benefit information is presented (the valuation date). Benefits payable under all circumstances—retirement, death, disability, and termination of employment—are included, to the extent they are deemed attributable to employee service rendered to the valuation date. Benefits to be provided via annuity contracts excluded from plan assets are excluded from accumulated Plan benefits.

The actuarial present value of accumulated plan benefits is determined by an actuary from the AAA Company and is that amount that results from applying actuarial assumptions to adjust the accumulated plan benefits to reflect the time value of money (through discounts for interest) and the probability of payment (by means of decrements such as for death, disability, withdrawal, or retirement) between the valuation date and the expected date of payment. The significant actuarial assumptions used in the valuations as of December 31, 19X1 and 19X0 were (a) life expectancy of participants (the 19X1 Group Annuity Mortality Table was used), (b) retirement age assumptions (the assumed average retirement age was 60), and (c) investment return. The 19X1 and 19X0 valuations included assumed average rates of return of 7% and 6.25%, respectively, including a reduction of .2% to reflect anticipated administrative expenses associated with providing benefits. The foregoing actuarial assumptions are based on the presumption that the Plan will continue. Were the Plan to terminate, different actuarial assumptions and other factors might be applicable in determining the actuarial present value of accumulated plan benefits.

5. Payment of Benefits. Benefit payments to participants are recorded upon distribution.
C. Funding Policy

As a condition of participation, employees are required to contribute 3% of their salary to the Plan. Present employees’ accumulated contributions at December 31, 19X1 and 19X0 were $2,575,000 and $2,325,000, respectively, including interest credited at an interest rate of 5% compounded annually. The Company’s funding policy is to make annual contributions to the Plan in amounts that are estimated to remain a constant percentage of employees’ compensation each year (approximately 5% for 19X1), such that, when combined with employees’ contributions, all employees’ benefits will be fully provided for by the time they retire. Beginning in 19X2, the Company’s contribution is expected to increase to approximately 6% to provide for the increase in benefits attributable to the Plan amendment effective July 1, 19X1 (Note H). The Company’s contributions for 19X1 exceeded the minimum funding requirements of ERISA.

Although it has not expressed any intention to do so, the Company has the right under the Plan to discontinue its contributions at any time and to terminate the Plan subject to the provisions set forth in ERISA.

D. Plan Termination

In the event the Plan terminates, the net assets of the Plan will be allocated, as prescribed by ERISA and its related regulations, generally to provide the following benefits in the order indicated:

a. Benefits attributable to employee contributions, taking into account those paid out before termination.

b. Annuity benefits that former employees or their beneficiaries have been receiving for at least three years, or that employees eligible to retire for that three-year period would have been receiving if they had retired with benefits in the normal form of annuity under the Plan. The priority amount is limited to the lowest benefit that was payable (or would have been payable) during those three years. The amount is further limited to the lowest benefit that would be payable under Plan provisions in effect at any time during the five years preceding Plan termination.

c. Other vested benefits insured by the Pension Benefit Guaranty Corporation (PBGC) up to the applicable limitations (discussed below).

d. All other vested benefits (that is, vested benefits not insured by the PBGC).

e. All nonvested benefits.

Benefits to be provided via contracts under which National (Note G) is obligated to pay the benefits would be excluded for allocation purposes.

 Certain benefits under the Plan are insured by the PBGC if the Plan terminates. Generally, the PBGC guarantees most vested normal age retirement benefits, early retirement benefits, and certain disability and survivor’s pensions. However, the PBGC does not guarantee all types of benefits under the Plan, and the amount of benefit protection is subject to certain limitations. Vested benefits under the Plan are guaranteed at the level in effect on the date of the Plan’s termination. However, there is a statutory ceiling, which is adjusted periodically, on the amount of an individual’s monthly benefit that the PBGC guarantees. For Plan terminations occurring during 19X2, that ceiling is $X,XXX per month. That ceiling applies to those pensioners who elect to receive their benefits in the form of a single-life annuity and are at least 65 years old at the time of retirement or plan termination (whichever comes later). For younger annuitants or for those who elect to receive their benefits in some form more valuable than a single-life annuity, the corresponding ceilings are actuarially adjusted downward. Benefit improvements attributable to the Plan amendment effective July 1, 19X1 (Note H) may not be fully guaranteed even though total benefit entitlements fall below the aforementioned ceilings. For example, none of the improve-
ment would be guaranteed if the Plan were to terminate before July 1, 19X2. After that date, the PBGC would guarantee 20% of any benefit improvements that resulted in benefits below the ceiling, with an additional 20% guaranteed each year the Plan continued beyond July 1, 19X2. If the amount of the benefit increase below the ceiling is also less than $100, $20 of the increase (rather than 20%) becomes guaranteed by the PBGC each year following the effective date of the amendment. As a result, only the primary ceiling would be applicable after July 1, 19X6.

Whether all participants receive their benefits should the Plan terminate at some future time will depend on the sufficiency, at that time, of the Plan’s net assets to provide for accumulated benefit obligations, and may also depend on the financial condition of the Plan sponsor and the level of benefits guaranteed by the PBGC.

E. Investments

The following table presents the fair value of investments. Investments that represent 5% or more of the Plan’s net assets are separately identified.

<table>
<thead>
<tr>
<th>Investments at Fair Value as Determined by Quoted Market Price</th>
<th>December 31, 19X1</th>
<th>December 31, 19X0</th>
</tr>
</thead>
<tbody>
<tr>
<td>C&amp;H Company common stock, 25,000 shares</td>
<td>$690,000</td>
<td>$880,000</td>
</tr>
<tr>
<td>U.S. government securities</td>
<td>350,000</td>
<td>270,000</td>
</tr>
<tr>
<td>Corporate bonds and debentures</td>
<td>3,000,000</td>
<td>3,670,000</td>
</tr>
<tr>
<td></td>
<td>4,040,000</td>
<td>4,820,000</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Investments at Estimated Fair Value</th>
<th>December 31, 19X1</th>
<th>December 31, 19X0</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plan interest in C&amp;H Master Trust</td>
<td>2,250,000</td>
<td>1,860,000</td>
</tr>
<tr>
<td>Investment contract with National Insurance Company #8041A, 8.0% (Note G)</td>
<td>1,000,000</td>
<td>890,000</td>
</tr>
<tr>
<td>Corporate bonds and debentures</td>
<td>500,000</td>
<td>—</td>
</tr>
<tr>
<td>Mortgages</td>
<td>480,000</td>
<td>460,000</td>
</tr>
<tr>
<td>Real estate</td>
<td>270,000</td>
<td>240,000</td>
</tr>
<tr>
<td></td>
<td>4,500,000</td>
<td>3,450,000</td>
</tr>
<tr>
<td></td>
<td>$8,540,000</td>
<td>$8,270,000</td>
</tr>
</tbody>
</table>

During 19X1, the Plan’s investments (including gains and losses on investments bought and sold, as well as held during the year) appreciated in value by $278,000 as follows:

Net Appreciation (Depreciation) in Fair Value

<table>
<thead>
<tr>
<th>Investments at Fair Value as Determined by Quoted Market Price</th>
<th>Year Ended December 31, 19X1</th>
</tr>
</thead>
<tbody>
<tr>
<td>C&amp;H Company common stock</td>
<td>$208,000</td>
</tr>
<tr>
<td>U.S. government securities</td>
<td>20,000</td>
</tr>
<tr>
<td>Corporate bonds</td>
<td>10,000</td>
</tr>
<tr>
<td></td>
<td>238,000</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Investments at Estimated Fair Value</th>
<th>Year Ended December 31, 19X1</th>
</tr>
</thead>
<tbody>
<tr>
<td>Investment contract with insurance company</td>
<td>40,000</td>
</tr>
<tr>
<td>Corporate bonds and debentures</td>
<td>(50,000)</td>
</tr>
<tr>
<td>Mortgages</td>
<td>100,000</td>
</tr>
<tr>
<td>Real estate</td>
<td>(50,000)</td>
</tr>
<tr>
<td></td>
<td>40,000</td>
</tr>
<tr>
<td></td>
<td>$278,000</td>
</tr>
</tbody>
</table>
F. Interest in C&H Master Trust

A portion of the Plan's investments are in the Master Trust which was established for the investment of assets of the Plan and several other C&H Company sponsored retirement plans. Each participating retirement plan has an undivided interest in the Master Trust. The assets of the Master Trust are held by GLC Trust Company (Trustee). At December 31, 19X1 and 19X0, the Plan’s interest in the net assets of the Master Trust was approximately 9% and 11%, respectively. Investment income and administrative expenses relating to the Master Trust are allocated to the individual plans based upon average monthly balances invested by each plan.

The following table presents the fair values of investments for the Master Trust.

<table>
<thead>
<tr>
<th>December 31</th>
<th>19X1</th>
<th>19X0</th>
</tr>
</thead>
<tbody>
<tr>
<td>Investments at fair value:</td>
<td>$11,900,000</td>
<td>$8,800,000</td>
</tr>
<tr>
<td>Common stocks</td>
<td>11,800,000</td>
<td>6,700,000</td>
</tr>
<tr>
<td>Corporate bonds</td>
<td>867,000</td>
<td>750,000</td>
</tr>
<tr>
<td>U.S. government securities</td>
<td>$24,567,000</td>
<td>$16,250,000</td>
</tr>
</tbody>
</table>

Investment income for the Master Trust is as follows:

<table>
<thead>
<tr>
<th>Year Ended December 31, 19X1</th>
</tr>
</thead>
<tbody>
<tr>
<td>Net appreciation in fair value of investments:</td>
</tr>
<tr>
<td>Common stocks</td>
</tr>
<tr>
<td>Corporate bonds</td>
</tr>
<tr>
<td>U.S. government securities</td>
</tr>
<tr>
<td>Interest</td>
</tr>
<tr>
<td>Dividends</td>
</tr>
<tr>
<td>$1,430,000</td>
</tr>
</tbody>
</table>

G. Contract With Insurance Company

In 19W8, the Company entered into an investment contract with the National Insurance Company under which the Plan deposits a minimum of $100,000 a year. National maintains the contributions in an unallocated fund to which it adds interest at a rate of 8%. The interest rate is guaranteed through 19X3 but is subject to change for each succeeding five-year period. When changed, the new rate applies only to funds deposited from the date of change. At the direction of the Plan's administrator, a single premium to buy an annuity for a retiring employee is withdrawn by National from the unallocated fund. Purchased annuities are contracts under which National is obligated to pay benefits to named employees or their beneficiaries. The premium rates for such annuities to be purchased in the future and maximum administration expense charges against the fund are also guaranteed by National on a five-year basis.

The annuity contracts provide for periodic dividends at National's discretion on the basis of its experience under the contracts. Such dividends received by the Plan for the year ended December
31, 19X1 were $25,000. In reporting changes in net assets, those dividends have been netted against amounts paid to National for the purchase of annuity contracts.

H. Plan Amendment

Effective July 1, 19X1, the Plan was amended to increase future annual pension benefits from 1 ¼% to 1½% of final 5-year average annual compensation for each year of service, including service rendered before the effective date. The retroactive effect of the Plan amendment, an increase in the actuarial present value of accumulated plan benefits of $2,410,000, was accounted for in the year ended December 31, 19X1. The actuarial present value of accumulated plan benefits at December 31, 19X0 does not reflect the effect of that Plan amendment. The Plan's actuary estimates that the amendment's retroactive effect on the actuarial present value of accumulated plan benefits at December 31, 19X0 was an increase of approximately $1,750,000, of which approximately $1,300,000 represents an increase in vested benefits.

I. Tax Status

The Internal Revenue Service has determined, and informed the Company by a letter dated June 30, 19XX, that the Plan and related trust are designed in accordance with the applicable sections of the Internal Revenue Code (IRC). The Plan has been amended since receiving the determination letter. However, the Plan administrator and the Plan's tax counsel believe that the Plan is designed and is currently being operated in compliance with the applicable requirements of the IRC.
Comment Letter

We welcome any comments and suggestions you have regarding this Checklist. Please send this completed form to: AICPA, Accounting and Auditing Publications, Harborside Financial Center, 201 Plaza Three, Jersey City, NJ, 07311-3881. Thank you.

Checklist Title: ________________________________________________________

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