TBS

OPCD

# Auditor General – areas of focus – 2016-17 Public Accounts – CAO Update

October 20, 2016

# Areas of Focus -- 2016-17 Public Accounts

**High risk**

1. Pension assets – expert panel, valuation work, review of accounting for other plans (HOOPP, CAATT)
2. Pension economic assumptions and disclosure in financial statements – follow up from 2015-16 audit (expect section in Ch 2 of 2016 AG report)
3. OPG and H1 – use of US GAAP to consolidate operations
   - AG accepted US GAAP on the basis of materiality in 2015-16, but required disclosure of differences using a methodology for OPG's asset retirement obligation that is inconsistent with OPG's view of a preferred accounting policy; AG has stated she will continue to require the same methodology in 2016-17 (expected deficit impact of $1B – increase to deficit)
4. Accounting for transfer payments – AG rejected guidance agreed to by previous AT that had been used for year-end transfers
5. General – expecting AG to reduce materiality re: path to balance goals

- Compiled from planning memo, draft audit findings report for 2015-16, and SUDs listing

# Areas of Focus -- 2016-17 Public Accounts

**Medium risk**

6. Liabilities for contaminated sites
   – Follow up on prior year audit on adoption of standard
7. Additional sale of Hydro One
   – Sale to OPG (related party) and transactions with COO
8. Accounting for Cap & Trade proceeds – new transaction stream
9. Consolidation
   – Universities – AG will review analysis at university level – currently no universities are consolidated
   – Children's Aid Societies -- AG believes these should be consolidated
   – Consolidation principles used by BPS – income statement expense presented net of 3rd party revenues, except for Edu property tax – AG recommends line by line consolidation
   – Monitoring of WSIB and MVAC
10. Non-ONFA unrealized gains/losses – AG recommends they should be recorded in statement of revenues and expenses – not recognized currently

- Compiled from planning memo, draft audit findings report for 2015-16, and SUDs listing

# Areas of Focus -- 2016-17 Public Accounts

**Low risk**

11. Deferred capital contributions
    - Included in planning memo as a risk, but since then PSAB issued is post implementation review report and determined no additional guidance would be issued.  AG communicated verbally that she would not be pursuing any additional discussion.

- Compiled from planning memo, draft audit findings report for 2015-16, and SUDs listing

Ontario

# 2015-16 Annual Report

## Consolidated Financial Statements

### Technical Briefing (condensed version)

October 3, 2016

# Summary 2015-16 Results

| 2015-16 Actual Results* | | | | | |
|---|---|---|---|---|---|
| $ Billions | 2015-16 Budget | 2015-16 Actual | 2014-15 Actual | Change from Budget | % Change |
| **Revenues** | 124.4 | **128.4** | 118.5 | 4.0 | 3.2% |
| **Expenses** | 131.9 | **133.4** | 128.8 | 1.5 | 1.1% |
| Reserve | 1.0 | **-** | - | (1.0) | |
| **Annual Deficit** | (8.5) | **(5.0)** | (10.3) | 3.5 | -41.2% |
| **Net Debt** | | **(305.2)** | (284.6) | | |
| **Accumulated Deficit** | | **(202.7)** | (187.5) | | |

*unaudited

# Jointly-Sponsored Pension Plans (JSPPs)

- Ontario Public Service Employee's Union Pension Plan (OPSEUPP) and Ontario Teachers' Pension Plan (OTPP) are jointly sponsored pension plans where the Government of Ontario is a co-sponsor.
- The plans are funded on a 50/50 basis, co-managed by the sponsors, and decisions regarding benefits and contributions require negotiation and agreement between them.
- Well into the 2015-16 audit, the Auditor General raised some concerns with regards to Ontario's accounting practices, based on ways the province can recognize a future benefit for assets such as pension assets for the OPSEUPP and OTPP plans.
- Pension accounting is complex and requires the application of professional judgment. Despite best efforts to try to resolve concerns, professional staff and the Auditor General continue to have differences of opinion on how the pension assets for these plans should be accounted for under PSAB.

# Accounting in Ontario for JSPPs

- Since 2001-02, the Province's share of pension assets reflected on the audited consolidated financial statements of the Province has been based on a policy considered to be appropriate and consistent with PSAB standards related to accounting for retirement benefits, which have not changed since they were last revised in 2001.
- Under PSAB, an asset arises when the government's total contributions to a plan, including interest earned thereon, are greater than the pension expense recognized since the start of the plan.
- The OPSEUPP and OTPP have both been reported in an asset position on the Province's consolidated financial statements for the past 14 years.
- The Province has received clean audit opinions for each of the past 22 years by four different Auditors General.
- Pension assets of OTPP and OPSEUPP were $10.7 billion as of March 31, 2016.

# Auditor General's Position

- Well into the 2015-16 audit, the Auditor General (AG) expressed a different interpretation of the existing PSAB standards which would materially impact the Province's reporting of pension assets of jointly sponsored pension plans.
- The AG communicated a view in writing on September 13 that:
  - The government does not have a legally enforceable right to unilaterally access the assets of these jointly sponsored pension plans. As such, with no agreement in place to the contrary, the AG believes that the pension asset should be removed from the Province's balance sheet.
  - Agreements to reduce future contributions would need to be in place with plan sponsors by each year end, before an asset could be reported in the Public Accounts.
  - The Province would need to take a full valuation allowance of the $10.7 billion pension assets currently reported for OTPP and OPSEUPP, which would eliminate these assets from the Province's consolidated financial statements.

# Province's Position

- Based on professional staff's interpretation of PSAB, the government believes that pension assets for OPSEUPP and OTPP exist and should be reported in order to fairly present the Province's financial position.
- Despite measurement uncertainty, the assets resulting from the application of PSAB standards to OTPP and OPSEUPP do have value, which reflects management's future expectations as required by PSAB.
- The Province has reported pension assets for OPSEUPP and OTPP on its books consistently since 2001, based on expected future benefits including reduced future contributions.
- The applicable standard (PS 3250) does acknowledge that an asset can exist and provides guidance on assessing whether a pension asset is impaired.
- Professional staff do not agree that irrevocable agreements to reduce future contributions need to be in place in order for an asset to be reflected on the Province's books under PSAB.

# Legislated Accounting for Jointly-Sponsored Pension Plans

- Given the differences in interpretation of the application of PSAB standards for OTPP and OPSEUPP pension assets, Cabinet has approved a time-limited regulation which legislates the accounting for pension assets of jointly sponsored pension plans for 2015-16.
- The effect of the regulation is to reflect the fiscal impact of the AG's position pending further review and analysis on this complex accounting matter.
- The regulation requires a full valuation allowance be recorded against the pension assets for 2015-16, therefore writing off the value of the assets.
- The $9.2 billion amount of the asset that was built up over time has been added to opening net debt and accumulated deficit for 2015-16.
- The increase in the asset during the year ($1.5 billion) has been written off to increase pension expense in 2015-16.
- The change in accounting treatment is not any reflection on the funding status of the plans, or the quality of financial reporting by the Province.

# Fiscal Impact of Accounting Treatment Change

- The regulated accounting change results in the exact same fiscal impact as the AG's interpretation of the PSAB standards.
- Impact of regulated accounting 2015-16 consolidated financial statements:
    - Increase in opening net debt and accumulated deficit by $9.2 billion (value of OTPP and OPSEUPP pension assets in 2014-15 audited statements)
    - Increase in annual pension expense by $1.5 billion, which increases the annual deficit by the same amount
    - Increase in ending net debt, accumulated deficit and pension liabilities by $10.7 billion (as at March 31, 2016)
- The change in the Province's accounting treatment for pension assets of jointly sponsored pension plans, while increasing net debt, has no impact on the Province's borrowing requirements.
- Total debt remains unchanged by the pension adjustment.

# Impact of Regulated Accounting on 2015-16 Annual Report

| ($ Millions) | Balance before Legislated Adjustment | Adjustment in accordance with Legislation | 2015-16 Annual Report |
|---|---|---|---|
| **Consolidated Statement of Operations** | | | |
| Total Expenses | 131,892 | 1,514 | 133,406 |
| Annual Deficit | (3,515) | (1,514) | (5,029) |
| | | | |
| **Consolidated Statement of Financial Position** | | | |
| Pensions and Other Employee Future Benefits | 1,439 | 10,668 | 12,107 |
| Total Debt | 327,413 | - | 327,413 |
| Net Debt | (294,565) | (10,668) | (305,233) |
| Accumulated Deficit | (192,029) | (10,668) | (202,697) |

# In-Depth Review of the Application of Accounting Standards

- The regulation for the legislated accounting treatment of jointly sponsored pension plans was made for 2015-16 only.
- The Province will initiate a review of the application of PSAB’s pension accounting standards to Ontario’s jointly sponsored pension plans and will conduct a valuation review of the pension assets.
- The review will seek the expert advice of individuals with a range of backgrounds and experience, including pension administrators, preparers and auditors of public sector financial reports.
- To support an informed discussion, participants would have an in-depth knowledge of public sector accounting standards as related to pension accounting and/or the specifics of the OTPP and OPSEUPP joint sponsor arrangements, as well as similar pension plans in other jurisdictions.