FORVS

Accounting for Compensated Absences



Accounting for Compensated Absences

March 19, 2024

WEBINAR

Meet the Presenters



Angie Dunlap, CPA

Partner



Greg Miller, CPA

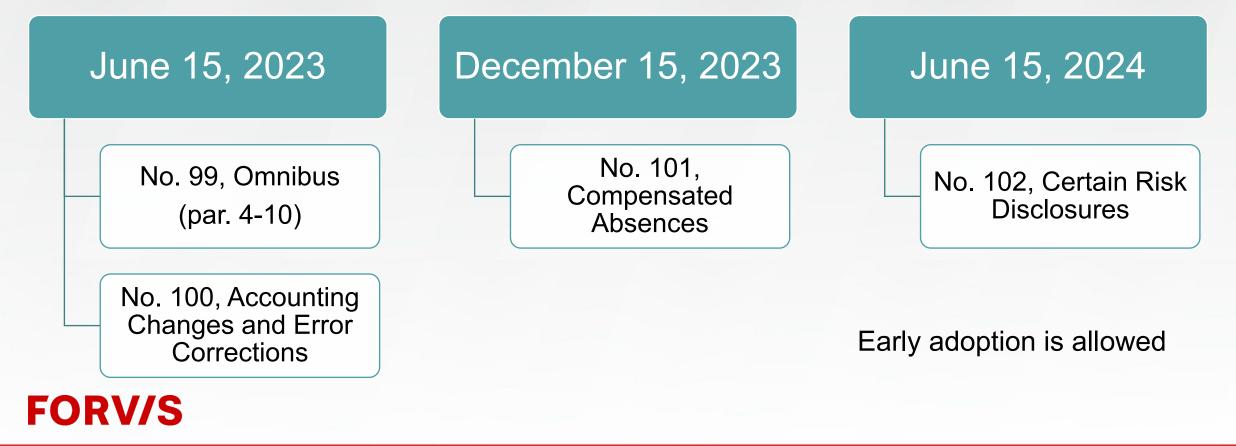
Director



FORVIS is a trademark of FORVIS, LLP, registered with the U.S. Patent and Trademark Office.

Upcoming Effective Dates

Reporting periods beginning after:



New Definition

| Definition – Compensated Absence | | | | | | | | |
|----------------------------------|---------------|--|--|--|--|--|--|--|
| Statement 16 | Statement 101 | | | | | | | |
| | | | | | | | | |

 Absences for which employees will be paid, such as vacation, sick leave, & sabbatical leave Leave for which employees may receive one or more

- Cash payments when the leave is used for time off
- Other cash payments, such as payment for unused leave upon termination of employment which includes voluntary resignation or retirement
- Noncash settlements, such as conversion to defined benefit postemployment benefits



Compensated Absences – Statement 16

- Why was a change needed?
 - Benefit practices have evolved
 - Inconsistent application of standards
 - Lack of guidance for new leave types
 - Changes to the conceptual framework since the issuance of the existing guidance



Compensated Absences – Statement 16

- Distinguished between types of paid leave
- Providing different guidance for vacation leave & sick leave
- Use of paid time off & compensatory time are more common
- Distinction between vacation & sick leave does not apply when government provides PTO

Examples of Compensated Absences

- Vacation & sick leave
- Paid time off (PTO)
- Parental leave
- Bereavement leave
- Holidays
- Compensatory time
- Certain types of sabbatical leave

Sabbatical Leave

Sabbatical leave in which an employee is not required to perform any significant duties for the government – unrestricted sabbatical leave – is a compensated absence

Sabbatical leave in which an employee is required to perform duties of a different nature for the government – is not a compensated absence



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Recognition

GASB Statement 101 provides recognition criteria for both of the following situations:

- Leave used but not paid or settled
- Unused leave



Recognition – Leave Used but Not Paid

Pay Rate

Generally, the employee's pay rate at financial reporting date
Exception: More likely than not

to be paid at a different rate

A liability should be reported when leave is used for time off but has not yet been paid in cash or settled through noncash means – including unlimited leave & date-specific holiday leave.

Salary-Related Payments

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- Directly & incrementally related
- DC pension or OPEB recognized as related leave is earned – not pension or OPEB liability
- DB pension or OPEB excluded

The liability should be measured at the amount of the cash payment or noncash settlement to be made for the use of the leave.

Salary-Related Payments

Directly associated – if the payment amount is a function of salary to be paid Incrementally associated – if the government will make payment in addition to the salary payment



Recognition – Unused Leave

A liability should be recognized for leave that has not been used if all of the following criteria are met:

Leave is attributable to services already rendered

• Employee has performed the services required to earn the leave

Leave accumulates

• Can be carried forward from reporting period when earned to a future reporting period when it will be used or otherwise paid or settled

Leave is more likely than not to be used for time off or otherwise paid or settled

Likelihood of more than 50%

More Likely Than Not

- Management judgment still required by assessing the following relevant factors:
 - The government's compensated absences employment policies
 - Whether benefits for which services have been rendered will become eligible for future payment
 - Historical information about the use, payment, or forfeiture of compensated absences
 - Information known to the government that would indicate that historical information may not be representative of future trends or patterns

More Likely Than Not

 Leave that is more likely than not to be settled through conversion to defined benefit postemployment benefits should not be recognized as a liability for compensated absences



Exceptions

- Sabbatical leave in which an employee is required to perform duties of a different nature for the government
- Leave that is settled through conversion to defined benefit pension or other postemployment plans
- Not recognized until used:
 - Leave that is dependent upon a sporadic event that affects a relatively small proportion of employees
 - Leave that can be taken without limits Unlimited leave
 - Holiday leave that is taken on a specific date not at the employee's discretion



Compensated Leave Calculation Methods

- Approaches from the GFOA's 117th Annual Conference in Portland, OR
- Days Used Approach
- Days Used Average Approach
- Days Paid Approach
- Dollars Paid Approach

- Presenters:
 - Angie Dunlap FORVIS
 - Holly Matthews North Texas
 Municipal Water District
 - Bob Scott Town of Prosper, TX

- Scenario:
 - Employees earn 1 day of sick leave for each month worked which can be carried over to future fiscal years, with a maximum carryover of 150 days
 - Employees are paid in cash for 50% of their unused sick leave upon termination of employment, at their hourly rate at time of termination



Historical Days of Leave Used

| | Α | В | С | D | E | F (Sum of A - E) | G (F/5) | H (G/12) |
|--------------------|-----------|-----------|-----------|-----------|-----------|---------------------|------------|-------------|
| | | | | | | | Average | |
| | | | | | | | Annual | % Used |
| | Days Used | Total Days | Use | per Year |
| | 2021 | 2022 | 2023 | 2024 | 2025 | Used | (Days) | as Leave |
| Active Employee #1 | 8 | 10 | 7 | 9 | 9 | 43 | 9 | 72% |
| Active Employee #2 | 7 | 11 | 6 | 8 | 7 | 39 | 8 | 65% |
| Active Employee #3 | 3 | 4 | 2 | 4 | 3 | 16 | 3 | 27% |
| Active Employee #4 | 4 | 3 | 5 | 4 | 3 | 19 | 4 | 32% |
| Active Employee #5 | 5 | 5 | 4 | 3 | 4 | 21 | 4 | 35% |



Sick Leave Compensated Absences Liability Estimate

| | - T | J (H above) | K (I x J) | L (K x 8) | М (I - К) | N (M x 8) | ο | P (L x O) | Q (N x O) | R (Q x 50%) |
|--------------------|------------|----------------|--------------|--------------|--------------|--------------|---------|---------------|---------------|----------------|
| | | | | | | | | | | |
| | Sick Leave | | Sick Leave | Sick Leave | Sick Leave | Sick Leave | Hourly | | | Capped Sick |
| | Accrued at | % Use as | to be Used | for Use | for Pay | for Pay | Rate at | Sick Leave to | Sick Leave to | Leave to be |
| | FYE (Days) | Leave | (Days) | (Hours) | (Days) | (Hours) | FYE | be Used (S) | be Paid (\$) | Paid |
| Active Employee #1 | 136 | 72% | 97 | 780 | 39 | 308 | \$26.44 | \$ 20,616 | \$ 8,151 | \$ 4,075 |
| Active Employee #2 | 158 | 65% | 103 | 822 | 55 | 442 | 28.85 | \$ 23,703 | \$ 12,763 | \$ 6,382 |
| Active Employee #3 | 250 | 27% | 67 | 533 | 183 | 1,467 | 52.88 | \$ 28,203 | \$ 77,557 | \$ 38,779 |
| Active Employee #4 | 227 | 32% | 72 | 575 | 155 | 1,241 | 55.29 | \$ 31,795 | \$ 68,611 | \$ 34,306 |
| Active Employee #5 | 206 | 35% | 72 | 577 | 134 | 1,071 | 57.69 | \$ 33,276 | \$ 61,798 | \$ 30,899 |
| | | | | | | | | \$ 137,593 | | \$ 114,440 |



Salary-related payments

Sick Leave Compensated Absences Liability Estimate

| | | Р | | Q | | R | | S | | т | | U | | V |
|--------------------|-----|------------|------|-----------|----|-----------|------|--------------|------|--------------|----------------|-----------|----|-------------|
| | | (L x O) | (| (N x O) | | Q x 30%) | (P + | • R x 6.2%) | (P - | + R x 1.45%) | (P + R x 5.0%) | | (| S + T + U) |
| | | | | | | | | | | | | | | |
| | | | | | Са | pped Sick | | | | | | 7 | | |
| | Sic | k Leave to | Sick | Leave to | Le | ave to be | Soc | ial Security | 1 | Medicare | 457 | b DC Plan | Тс | otal Salary |
| | be | Used (S) | be | Paid (\$) | | Paid | | (6.2%) | | (1.45%) | | (5%) | | Related |
| Active Employee #1 | \$ | 20,616 | \$ | 8,151 | \$ | 4,075 | \$ | 1,531 | \$ | 358 | \$ | 1,235 | \$ | 3,123 |
| Active Employee #2 | \$ | 23,703 | \$ | 12,763 | \$ | 6,382 | \$ | 1,865 | \$ | 436 | \$ | 1,504 | \$ | 3,806 |
| Active Employee #3 | \$ | 28,203 | \$ | 77,557 | \$ | 38,779 | \$ | 4,153 | \$ | 971 | \$ | 3,349 | \$ | 8,473 |
| Active Employee #4 | \$ | 31,795 | \$ | 68,611 | \$ | 34,306 | \$ | 4,098 | \$ | 958 | \$ | 3,305 | \$ | 8,362 |
| Active Employee #5 | \$ | 33,276 | \$ | 61,798 | \$ | 30,899 | \$ | 3,979 | \$ | 931 | \$ | 3,209 | \$ | 8,118 |
| | \$ | 137,593 | | | \$ | 114,440 | | | | | | | \$ | 31,882 |

Historical Days of Leave Used

| | | Р | | Q | | R | | S | | т | | U | | V | | X |
|--------------------|-----|------------|------|-----------|----|-----------|------------|---------------|------|-----------------|------|-------------|-----|-----------|-----|-------------|
| | | (L x O) | (| N x O) | (0 | Q x 30%) | (P | + R x 6.2%) | (P + | R x 1.45%) | (P + | - R x 5.0%) | (S | + T + U) | (P | + R + V) |
| | | | | | | | | | | | | | | | | |
| | | | | | Ca | pped Sick | - | | | | | | | | Tot | al Liab for |
| | Sic | k Leave to | Sick | Leave to | Le | ave to be | Soc | cial Security | Ν | Nedicare | 457 | b DC Plan | Tot | al Salary | Сс | omp Abs |
| | be | Used (S) | be | Paid (\$) | | Paid | | (6.2%) | | (1.45%) | | (5%) | R | lated | Si | ck Leave |
| Active Employee #1 | \$ | 20,616 | \$ | 8,151 | \$ | 4,075 | \$ | 1,531 | \$ | 358 | \$ | 1,235 | \$ | 3,123 | \$ | 27,815 |
| Active Employee #2 | \$ | 23,703 | \$ | 12,763 | \$ | 6,382 | \$ | 1,865 | \$ | 436 | \$ | 1,504 | \$ | 3,806 | \$ | 33,891 |
| Active Employee #3 | \$ | 28,203 | \$ | 77,557 | \$ | 38,779 | \$ | 4,153 | \$ | 971 | \$ | 3,349 | \$ | 8,473 | \$ | 75,454 |
| Active Employee #4 | \$ | 31,795 | \$ | 68,611 | \$ | 34,306 | \$ | 4,098 | \$ | 958 | \$ | 3,305 | \$ | 8,362 | \$ | 74,463 |
| Active Employee #5 | \$ | 33,276 | \$ | 61,798 | \$ | 30,899 | \$ | 3,979 | \$ | 931 | \$ | 3,209 | \$ | 8,118 | \$ | 72,292 |
| | \$ | 137,593 | | | \$ | 114,440 | | | | | | | \$ | 31,882 | \$ | 283,915 |



- Scenario:
 - Employees earn 1 day of sick leave for each month worked which can be carried over to future fiscal years, with a maximum carryover of 150 days
 - Employees are paid in cash for 50% of their unused sick leave upon termination of employment, at their hourly rate at time of termination



Historical days of leave used

| | Α | В | С | D | E | F | G | н |
|-------------------|------|-----------|------|------|------------------|----------------|---------|---------------|
| | | | Č | U | | (Sum of A - E) | (F/5) | (G/12) |
| | | | | | | | Average | |
| | Days | | Days | Days | | | Annual | |
| | Used | Days Used | Used | Used | Days Used | Total Days | Use | % Used per |
| | 2021 | 2022 | 2023 | 2024 | 2025 | Used | (Days) | Year as Leave |
| Former employee 1 | 8 | 10 | 7 | 9 | 9 | 43 | 9 | 72% |
| Former employee 2 | 7 | 11 | 6 | 8 | 7 | 39 | 8 | 65% |
| Former employee 3 | 3 | 4 | 2 | 4 | 3 | 16 | 3 | 27% |
| Former employee 4 | 4 | 3 | 5 | 4 | 3 | 19 | 4 | 32% |
| Former employee 5 | 5 | 5 | 4 | 3 | 4 | 21 | 4 | 35% |
| Totals | 27 | 33 | 24 | 28 | 26 | 138 | | |
| | | | | | Days earned | 300 | | |
| | | | | A | vg used of group | 46.0% | | |

Sick Leave Compensated Absences Liability Estimate

| | | J (H above) | K (I x J) | L (K x 8) | M (I - K) | N (M x 8) | Ο | P (L x O) | Q (N x O) | R (Q x 50%) |
|-------------------|---------|----------------|--------------|--------------|--------------|--------------|---------|---------------|---------------|----------------|
| | Sick | | | | | | | | | |
| | Leave | | Sick | Sick | Sick | Sick | | | | |
| | Accrued | | Leave to | Leave for | Leave for | Leave for | Hourly | | | Capped Sick |
| | at FYE | % Use as | be Used | Use | Рау | Рау | Rate at | Sick Leave to | Sick Leave to | Leave to be |
| | (Days) | Leave | (Days) | (Hours) | (Days) | (Hours) | FYE | be Used (S) | be Paid (\$) | Paid |
| Active employee 1 | 136 | 46.0% | 63 | 504 | 73 | 584 | \$26.44 | \$ 13,326 | \$ 15,441 | \$ 7,720 |
| Active employee 2 | 158 | 46.0% | 73 | 584 | 85 | 680 | \$28.85 | 16,848 | 19,618 | 9,809 |
| Active employee 3 | 250 | 46.0% | 115 | 920 | 135 | 1080 | \$52.88 | 48,650 | 57,110 | 28,555 |
| Active employee 4 | 227 | 46.0% | 104 | 832 | 123 | 984 | \$55.29 | 46,001 | 54,405 | 27,203 |
| Active employee 5 | 206 | 46.0% | 95 | 760 | 111 | 888 | \$57.69 | 43,844 | 51,229 | 25,614 |
| Totals | | | | | | | | \$ 168,669 | | \$ 98,902 |

| Sick Leave Co | ompensated A | bsences Liabi | lity Estimate | | | | |
|---------------|---------------|---------------|-----------------|-----------------|----------------|--------------|----------------|
| Р | Q | R | S | т | U | V | X |
| (L x O) | (N x O) | (Q x 50%) | (P + R x 6.2%) | (P + R x 1.45%) | (P + R x 5.0%) | (S + T + U) | (P + R + V) |
| | | | | | | | |
| | | | | | | | |
| | | Capped Sick | | | | | Total Liab for |
| Sick Leave to | Sick Leave to | Leave to be | Social Security | Medicare | 457b DC Plan | Total Salary | Comp Abs |
| be Used (S) | be Paid (\$) | Paid | (6.2%) | (1.45%) | (5%) | Related | Sick Leave |
| \$ 13,326 | \$ 15,441 | \$ 7,720 | \$ 1,305 | \$ 305 | \$ 1,052 | \$ 2,662 | \$ 23,709 |
| 16,848 | 19,618 | 9,809 | 1,653 | 387 | 1,333 | 3,372 | 30,030 |
| 48,650 | 57,110 | 28,555 | 4,787 | 1,119 | 3,860 | 9,766 | 86,971 |
| 46,001 | 54,405 | 27,203 | 4,539 | 1,061 | 3,660 | 9,260 | 82,464 |
| 43,844 | 51,229 | 25,614 | 4,306 | 1,007 | 3,473 | 8,787 | 78,245 |
| \$ 168,669 | | \$ 98,902 | | | | \$ 33,848 | \$ 301,419 |

Example – Days Paid Approach

| Days Paid Approach | | | | |
|--|----------|----------------|------|-----------|
| | | Per Payroll Re | cord | ds |
| | | Reimbursed | | |
| | | Unused Sick | | |
| | Years of | Leave | Si | ck Leave |
| | service | (Days) | Us | ed (Days) |
| Former employee #1 | 17 | 25.00 | | 135.50 |
| Former employee #2 | 2 | | | 6.00 |
| Former employee #3 | 23 | 22.25 | | 174.50 |
| Former employee #4 | 8 | 6.75 | | 25.00 |
| Former employee #5 | 10 | 13.00 | | 46.00 |
| | 60 | 67.00 | | 387.00 |
| | | | | |
| Days paid/used | А | 67.00 | | 387.00 |
| Average daily pay for active employees | В | \$ 87 | \$ | 87 |
| | C = AxB | \$ 5,829 | \$ | 33,669 |
| 50% cap on termination payment | D | 0.50 | | N/A |
| | E = CxD | \$ 2,915 | \$ | 33,669 |
| Total years of service of terminated employees | F | 60.00 | | 60.00 |
| | G = E/F | \$ 49 | \$ | 561 |
| Total years of service of active employees | Н | 236.00 | | 236.00 |
| | l = GxH | \$ 11,464 | \$ | 132,431 |
| Provision of salary-related payments | J | 7.65% | | 7.65% |
| | K = IxJ | \$ 877 | \$ | 10,131 |
| Total days paid/days used liability | L = I+K | \$ 12,341 | \$ | 142,562 |
| Total compensated absences liability | Sum of L | | \$ | 154,903 |

Example – Dollars Paid Approach

| Dollars Paid Approact | h | | | | | | | | |
|------------------------------|----------|-------------|-------------|-------------|-------------|---------------------|------------|-------------|-----------------|
| | Α | В | С | D | E | F (Sum of A - E) | G (F/5) | H (G/12) | |
| | | Per Payr | oll Records | | | | | | |
| | | Reimbursed | | | | | | | |
| | | Unused Sick | | | | | | PV | |
| | Years of | Leave | Sick Leave | Termination | Years Since | Value of | | Termination | PV Leave |
| | Service | (Days) | Used (Days) | Payment | Payment | Leave Used | 3.25% | Payments | Used |
| Former Employee #1 | 17 | 25.00 | 135.50 | \$ 927 | 5 | \$ 58,011 | 1.1734 | \$ 790 | \$ 49,438 |
| Former Employee #2 | 2 | - | 6.00 | \$- | 4 | 1,060 | 1.1365 | \$ - | \$ 932 |
| Former Employee #3 | 23 | 22.25 | 174.50 | \$ 974 | 3 | 88,657 | 1.1007 | \$ 885 | \$ 80,546 |
| Former Employee #4 | 8 | 6.75 | 25.00 | \$ 227 | 2 | 7,501 | 1.0661 | \$ 213 | \$ 7,036 |
| Former Employee #5 | 10 | 13.00 | 46.00 | \$ 615 | 1 | 14,346 | 1.0325 | \$ 596 | \$ 13,895 |
| | 60 | 67.00 | 387.00 | \$ 2,744 | | \$ 169,575 | | \$ 2,484 | \$ 151,847 |

Example – Dollars Paid Approach

| Form | er Empl | oyee | e #1 | | | |
|------|---------|------|-----------|-----------------|---------|---------------|
| Year | Raise | Ηου | Irly Rate | Leave Days Used | Value o | of Leave Used |
| 1 | | \$ | 41.10 | 2.0 | \$ | 657.60 |
| 2 | 1.025 | \$ | 42.13 | 5.0 | \$ | 1,685.10 |
| 3 | 1.030 | \$ | 43.39 | 6.0 | \$ | 2,082.78 |
| 4 | 1.028 | \$ | 44.58 | 8.0 | \$ | 2,853.41 |
| 5 | 1.030 | \$ | 45.92 | 8.0 | \$ | 2,939.02 |
| 6 | 1.031 | \$ | 47.35 | 7.0 | \$ | 2,651.36 |
| 7 | 1.030 | \$ | 48.77 | 8.0 | \$ | 3,121.03 |
| 8 | 1.025 | \$ | 49.99 | 9.0 | \$ | 3,598.94 |
| 9 | 1.025 | \$ | 51.23 | 6.0 | \$ | 2,459.27 |
| 10 | 1.028 | \$ | 52.64 | 9.0 | \$ | 3,790.36 |
| 11 | 1.030 | \$ | 54.22 | 10.0 | \$ | 4,337.85 |
| 12 | 1.032 | \$ | 55.96 | 9.0 | \$ | 4,029.00 |
| 13 | 1.030 | \$ | 57.64 | 9.0 | \$ | 4,149.87 |
| 14 | 1.037 | \$ | 59.77 | 9.0 | \$ | 4,303.41 |
| 15 | 1.030 | \$ | 61.56 | 11.0 | \$ | 5,417.52 |
| 16 | 1.025 | \$ | 63.10 | 10.5 | \$ | 5,300.55 |
| 17 | 1.020 | \$ | 64.36 | 9.0 | \$ | 4,634.19 |
| 18 | 1.021 | | | | \$ | - |
| 19 | 1.025 | | | | \$ | |
| 20 | 1.030 | | | | \$ | |
| 21 | 1.031 | | | | \$ | - |
| 22 | 1.035 | | | | \$ | - |
| 23 | 1.030 | | | | \$ | <u> </u> |
| | | | | | | |
| | | \$ | _ | 135.5 | \$ | 58,011.25 |

Example – Dollars Paid Approach

| Dollars Paid Approach | | | | |
|--|------|--------------------|-----|-----------------|
| | ((| H G/12) | | |
| | | PV | | |
| | | nination yments | Р | V Leave Used |
| Former Employee #1 | \$ | 790 | \$ | 49,438 |
| Former Employee #2 | | - | | 932 |
| Former Employee #3 | | 885 | | 80,546 |
| Former Employee #4 | | 213 | | 7,036 |
| Former Employee #5 | | 596 | | 13,895 |
| | \$ | 2,484 | \$ | 151,847 |
| Assume lower average salary level of active employ | vees | 85.0% | | 85.0% |
| | \$ | 2,112 | \$ | 129,070 |
| Total years of service of terminated employees | | 60 | | 60 |
| Average Rate | \$ | 35 | \$ | 2,151 |
| Total years of service of active employees | | 236 | | 236 |
| | \$ | 8,306 | \$ | 507,676 |
| Salary-related payments | | 7.65% | | 7.65% |
| | \$ | 635 | \$ | 38,837 |
| Totals | \$ | 8,942 | \$ | 546,514 |
| Total compensated absences liability | | | \$5 | 55,455.42 |

Disclosure Requirements

- Long-term liability disclosure options:
 - Present separate increases & decreases (gross presentation)
 - Present a net increase or net decrease
 - Disclose that it is net amount
 - Short-term/long-term estimation



Transition

 Transition changes at adoption should be reported as a change in accounting principle in accordance with Statement No. 100, Accounting Changes and Error Corrections

 Effective for fiscal years beginning after December 15, 2023 & all reporting periods thereafter. Earlier application is encouraged.



No. 100, Accounting Changes & Error Corrections

Effective Date

Reporting periods beginning after June 15, 2023



FORVIS is a trademark of FORVIS, LLP, registration of which is pending with the U.S. Patent and Trademark Office.

Two Separate Classifications in GASB 100:

Accounting Changes

1. Change in accounting principle

2. Change in accounting estimate

3. Change to or within the financial reporting entity

Error Correction

Correction of an error in previously issued financial statements

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1. Change in Accounting Principle

A change in accounting principle results from either:

A change from one generally accepted accounting principle to another that is justified on the basis that the newly adopted accounting principle is preferable, based on the qualitative characteristics of financial reporting

Implementation of new pronouncements



Accounting

| Change in accounting principle | Reported retroactively by restating prior periods presented, if practicable If not practicable, restate beginning balances of current period |
|--|---|
| Change in accounting estimate | Reported prospectively Recognized in current-period flows |
| Change to/within the reporting entity | Reported by adjusting current period beginning balances |
| Error correction | Reported retroactively by restating prior periods presented |

Financial Statements & Disclosures

 Aggregate amount of adjustments to & restatements of beginning balances should be displayed for each reporting unit

 Disclosures vary depending on the type of item, but common disclosures include: The nature of the change or error & its correction

Reason for the change

The effects on beginning net position, fund balance, or fund net position, as applicable, presented in a tabular format

Required Supplemental Information (RSI) & Supplemental Information (SI)

The Statement addresses how to present in RSI & SI information that is affected by an accounting change or error correction.

Periods earlier than those presented in basic financial statements should **not** be restated for changes in accounting principles. Periods earlier than those presented in basic financial statements should be restated for error corrections, if practicable.

Questions?



FORVIS is a trademark of FORVIS, LLP, registration of which is pending with the U.S. Patent and Trademark Office.

Thank You!

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The information set forth in this presentation contains the analysis and conclusions of the author(s) based upon his/her/their research and analysis of industry information and legal authorities. Such analysis and conclusions should not be deemed opinions or conclusions by FORVIS or the author(s) as to any individual situation as situations are fact specific. The reader should perform its own analysis and form its own conclusions regarding any specific situation. Further, the author(s) conclusions may be revised without notice with or without changes in industry information and legal authorities.

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