Subscription-Based IT Arrangements (SBITAs), Public-Private and Public-Public Partnerships (PPPs), and Availability Payment Arrangements (APAs)

GASB 96 and 94



January 26, 2023



Subscription-Based Information Technology Arrangements (SBITAs) GASB 96 OFM

- Establishes definitions of Subscription-Based Information Technology Arrangements (SBITAs)
- Provides uniform guidance on accounting and financial reporting for these types of transactions.
- Applies similar recognition, measurement, and remeasurements requirements to the requirements for lease transactions in Statement 87, *Leases*

A contract that conveys control of the right to use another party's (SBITA vendor's) IT software, alone or in combination with tangible capital assets, as specified in the contract for a period of time in an exchange or exchange-like transaction.

- Excludes contracts that solely provide IT support services
- Includes contracts that contain both a right-to-use IT asset and IT support services

Relationship Between SBITAs and Leases



• Accounting depends on what the underlying asset is:

Underlying Asset	Type of Agreement	Asset GLs	Liability GLs	Asset Type in FPMT
Tangible IT capital asset alone	Right-to-use Lease (GASB 87)	2650 & (2660) - Lease Asset- Equipment	5174/5274 — Lease Liability	Other Asset – Equipment or IT Hardware
IT software alone	SBITA (GASB 96)	2670 & (2680) - Subscription Information Technology Asset	5175/5275 - Subscription Information Technology Liability	Other Asset - Software
IT software in combination with tangible capital asset	If software component is insignificant compared to cost of underlying tangible capital asset (copy machines) = Right-to-use lease (GASB 87) Otherwise, SBITA (GASB 96)			

Capitalization Policy for SBITAs

Capitalize all subscription-based IT arrangements with a subscription term greater than 1 year and with total payments over the subscription term of \$1,000,000 or greater



For SBITAs that started prior to 7/1/2022:

- Capitalize if payments remaining after 7/1/2022 are \$1,000,000 or greater
- Subscription IT Liability and Asset will be calculated only using payments on or after 7/1/2022
- Implementation costs can only be capitalized if they were paid after 7/1/2022

Subscription Term



Exclude periods where:

- 1. Both parties have the option to terminate without permission from the other, or
- 2. If both parties have to agree to extend

Examples: Month-to-month contracts or a contract that continues in a holdover period until a new contract is entered into.

Ignore fiscal funding/cancelation clauses unless reasonably certain it will be exercised

Definition: SBITAs with a *maximum* possible subscription term of 12 months or less, including:

- Rolling month-to-month or year-to-year SBITAs, or a SBITA that continues into a holdover period until a new contract is signed
- SBITAs where both the agency and vendor have the option to terminate without permission from the other party (such as with 30 or 60 days notice)

Record payments as a current period expenditure/expense

Fixed payments	Fixed in substance payments	Variable payments	Incentives from Vendor	Termination Penalties	Other payments
Such as a base fee	Variable payments that are in- substance, fixed payments	Only if they depend on an index or a rate (CPI)	Equivalent to a rebate or discount	If the subscription term includes the agency exercising	Any other payments that are reasonably certain of being paid

Variable payments that are performance or usage-based are excluded from the subscription IT liability calculation

Variable payments	Nonsubscription Components*	Other payments
That depend on the usage or performance of the asset	Such as payments for services	Any other payments that were not included in the subscription liability
Expense using SO/SSO for variable lease payments: EY/Y202	Expense using appropriate subobject and sub-subobject	Expense using SO/SSO for other lease payments: EY/Y2O3

*If a contract does not include prices for nonsubscription components, an estimate should be used to allocate the contract price to those components

- The capitalization threshold should be applied to each contract
- Consider these when deciding what is the "contract":
 - Contract combinations: Contracts entered into at or near the same time with the same vendor and should be considered part of the same contract if either:
 - Contracts are negotiated as a package with single objective
 - The amount to be paid for one contract depends on the price or performance of the other
 - Multiple assets with different subscription terms should be split out and accounted for as separate contracts if practicable

Relationship Between SBITAs and Leases



- Activities associated with a SBITA should be grouped into one of three stages:
 - 1. Preliminary Project Stage
 - 2. Initial Implementation Stage
 - 3. Operations and Additional Implementation Stage
- The nature of the activity should be the determining factor when deciding what stage the expense falls in
- Training costs should be expensed as incurred regardless of the stage in which they're incurred.

PRELIMINARY PROJECT STAGE		
Activities	 Conceptual formulation Evaluation of alternatives Determination of needed technology Selection of vendor 	
Accounting	Expense as incurred	
When is stage complete?	When the above activities are complete, and/or management implicitly or explicitly authorizes and commits to funding the contract (at least for the current fiscal year)	

INITIAL IMPI	INITIAL IMPLEMENTATION STAGE		
Activities	 Configuration Coding Testing Installation Data conversion only if the asset cannot be used without the data conversion 		
Accounting	 Capitalize a. Accumulate costs in GL 2510 – Construction in Progress b. Capitalize in GL 2670 – Subscription Information Technology Asset when SBITA is placed in service 		
When is stage complete?	When subscription asset is placed in service		

Training costs should be expensed, regardless of the stage in which they're incurred

OPERATIONS AND ADDITIONAL IMPLEMENTATION STAGE			
Activities	 Maintenance Troubleshooting Data conversion (Not necessary to place the subscription asset into service) 	 Modifications that result in either: Increased functionality of the asset that provides the ability to perform additional tasks, or Increased efficiency of the asset or level of service provided by the asset 	
Accounting	Expense as incurred	Capitalize as an addition to existing asset	

Training costs should be expensed, regardless of the stage in which they're incurred

What if the SBITA has multiple modules?

- Initial implementation stage is complete and asset is placed into service when the initial implementation is completed for the first independently functional module or for the first set of independent modules.
- Costs to implement remaining modules of that SBITA, should be capitalized if they meet the modification criteria
- Otherwise, record as an expenditure/expense

Initial Measurement of Subscription Asset & Liability

Payment Type	Include in Measurement?	Amount	
Base payment	Yes, fixed payments are included	\$5.2 M	(\$150,000/month x 36 mths discounted at 3%)
Charge based on number of users	No, variable payments based on usage are excluded		Code to EY/Y202
Maintenance and support services	No, service components are excluded		Continue coding to EY, with appropriate SSO
Initial value of subscription IT liability		\$5.2 M	
Implementation Costs	Activities during implementation stage only	\$1.5 M	
Initial value	of subscription IT asset	\$6.7 M	

Costs of modifications to the subscription asset that result in (1) increased functionality and provides the ability to perform additional tasks or (2) increased efficiency of the asset or level of service should be added on to the asset

Subsequent Measurement of Subscription IT Asset

Use straight-line method to amortize over the shorter of the subscription term or the asset's useful life

Amortization expense	\$143,656	per month
Divided by subscription term	36	months
Initial value of subscription IT asset	\$6,700,000	

Monthly payment schedule based on present value of SBITA payments

Date	Beginning Balance	Interest Paid	Principal Paid	Total Payment	Balance after Payment
1/1/20X1	\$5,170,865	\$	\$150,000	\$150,000	\$5,020,865
2/1/20X1	5,020,865	12,552	137,448	\$150,000	4,883,417
3/1/20X1	4,883,417	12,209	137,791	\$150,000	4,745,625
4/1/20X1	4,745,625	11,864	138,136	\$150,000	4,607,489
5/1/20X1	4,607,489	11,519	138,481	\$150,000	4,469,008
6/1/20X1	4,469,008	11,173	139,827	\$150,000	4,330,181
		\$59,316	\$840,684	\$900,000	

SBITA Accounting Overview – Governmental Funds

Fund	When SBITA is Placed in Service	Subsequent Periods
Operating Fund	 Recognize capital outlay (GL 6514, subobject JS) and other financing source (GL 3221, revenue source 0810) 	 Record payments broken out between: Principal (EY/Y200) Interest (EY/Y201) Variable Payments (EY/Y202)
Account 997 Capital Asset Sub Account	 Recognize Subscription IT Asset (GL 2670) Reclassify implementation costs from construction in progress (GL 2510 to GL 2670) 	 Amortize subscription asset over subscription term Dr. Amortization Expense (GL 6591, subobject WA) Cr. Allowance for Amort Subscription Asset (GL 2680)
Account 999 Long-Term Obligations Sub Account	4. Recognize Subscription IT Liability (GLs 5175/5275)	 Reduce Subscription IT Liability based on amount of principal paid Reclassify principal due within one year to short-term (GL 5175)

SBITA Accounting Overview – Propriety & Trust Funds

Wh	en SBITA is Placed in Service	Su	bsequent Periods
1.	Recognize subscription IT asset	1.	Record payments broken out between:
	(GL 2670) and subscription IT		 Principal (EY/Y200)*
	liability (GLs 5175/5275)		 Interest (EY/Y201)
2.	Reclassify implementation costs		 Variable Payments (EY/Y202)
	from construction in progress	2.	Reduce Subscription IT Liability based on
	(GL 2510 to GL 2670)		amount of principal paid
			Dr. Subscription Liability (GL 5175)
			Cr. GAAP Expense Eliminations
			(GL 6525, EY/Y200)*
		3.	Amortize asset over subscription term
			Dr. Amortization Expense
			(GL 6511, subobject WA)
			Cr. Allowance for Amort Subscription
			Asset (GL 2680)
		4.	Reclassify principal due within one year to
			short-term (GL 5175)

*This entry is only for budgeted accounts. If the account is non-budgeted, then no expense for principal needs to be recorded. Instead, directly reduce the subscription IT liability

- GASB Statement No. 96 doesn't change restrictions on prepaid goods and services.
- State constitution, section 5 states, "The credit of the state shall not, in any manner be given or loaned to, or in aid of, any individual, association, company or corporation."
- There are limited exceptions to this. See SAAM 85.32.50.





Public-Public and Public-Private Partnerships (PPPs) and Availability Payment Arrangements (APAs) – GASB 94

- Establishes definitions of *Public-Private and Public-Public Partnerships* (PPPs or P3s) *and Availability Payment Arrangements* (APAs)
- Provides uniform guidance on accounting and financial reporting for these types of transactions.
- Applies similar recognition, measurement, and remeasurements requirements to the requirements for lease transactions in Statement 87, *Leases*

A PPP is an arrangement in which a government (the transferor) contracts with an operator to provide public services by conveying control of the right to operate or use a nonfinancial asset, such as infrastructure or other capital asset (the underlying PPP asset), for a period of time in an exchange or exchange-like transaction.

Some PPPs are Service Concession Arrangements (SCA)

PPPs



An SCA is a PPP in which <u>all of the following criteria are met</u>:

- 1. The transferor conveys to the operator the right and related obligation to provide public services through the use and operation of an underlying PPP asset in exchange for significant consideration, such as an up-front payment, installment payments, a new facility, or improvements to an existing facility.
- 2. The operator collects and is compensated by fees from third parties.
- 3. The <u>transferor determines or has the ability to modify or approve</u> which services the operator is required to provide, to whom the operator is required to provide the services, and the prices or rates that can be charged for the services.
- 4. The <u>transferor is entitled to significant residual interest</u> in the service utility of the underlying PPP asset at the end of the arrangement.

Service Concession Arrangements



A PPP should be accounted for as a lease if all of the following criteria is met:

- PPP that is not an SCA,
- Agreement meets definition of a lease,
- PPP asset is existing asset of the transferor, and
- Operator is not required to make improvements to the asset

PPP Accounting Overview - Transferor

PPP Asset is:	Recognize
Existing asset of transferor (but not lease)	 At commencement of PPP term, Continue to recognize asset Recognize an asset for any improvements made by the operator Receivable for installment payments, if any, to be received A deferred inflow of resources
New asset purchased or constructed & an SCA	 When asset is place in service, record asset At commencement of the PPP term, Receivable for installment payments, if any, to be received A deferred inflow of resources
New asset purchased or constructed & not an SCA	 When asset is place into service, Record a receivable for the asset purchased or constructed to be received from the operator Receivable for installment payments, if any, to be received A deferred inflow of resources

Initial Value

- Receivable for installment payments should initially be measured at the present value of PPP payments expected to be received, including
 - Fixed payments
 - Variable payments that depend on an index or a rate
 - Variable payments that are fixed in-substance
 - Residual value guarantee payments

Subsequent Periods

- Record interest revenue
- Reduce receivable based on portion considered principal
- Record allowance for uncollectible payments, if applicable

Initial Value

- Amount of Receivable for installment payments, plus any of the following applicable amounts
 - Payments received from the operator before commencement of the PPP term
 - Initial value of new asset purchased or constructed
 - Initial value of improvements made to PPP asset
 - Initial value of receivable for the underlying PPP asset

Subsequent Periods

 Recognize as revenue in systematic and rational matter over PPP term
PPP Asset is:	Recognize
Existing asset of transferor (but not a lease)	At commencement of PPP term,Liability for installment paymentsIntangible right-to-use asset (capital asset)
New asset purchased or constructed & an SCA	 At commencement of PPP term, Liability for installment payments Intangible right-to-use asset (capital asset)
New asset purchased or constructed & not an SCA	 When asset is place into service, Liability for the underlying PPP asset to be transferred to the transferor Liability for installment payments Deferred outflow of resources for underlying asset to be transferred to the transferor

Initial Value

- Liability for installment payments should initially be measured at the present value of PPP payments expected to be received, including
 - Fixed payments
 - Variable payments that depend on an index or a rate
 - Variable payments that are fixed in-substance
 - Payments reasonably certain to pay such as residual value guarantee payments, termination penalties

Subsequent Periods

- Record interest expense
- Reduce liability based on portion considered principal

Initial Value

- Amount of liability for installment payments, plus any of the following applicable amounts
 - Payments made to the transferor received from the operator before commencement of the PPP term
 - Cost of new asset purchased or constructed, if it meets definition of an SCA
 - Cost of improvements made to PPP asset
 - Initial direct costs

Subsequent Periods

 Amortize using straight-line method over shorter of asset useful life or the PPP term APA is an arrangement in which a government compensates an operator for activities that may include designing, constructing, financing, maintaining, or operating an underlying nonfinancial asset for a period of time in an exchange or exchange-like transaction.

- The payments by the government are <u>based entirely on the</u> <u>asset's availability for use</u> rather than on tolls, fees, or similar revenues or other measures of demand.
- In an APA, <u>a government procures a capital asset or service</u>, rather than receiving compensation to allow another entity to provide public services.
- In contrast to a PPP, the other party to an APA is receiving compensation from the government <u>based entirely on</u> <u>availability to perform</u> and not the actual performance of a public service.

Component Related To	Accounting
Design, construction, or financing of a nonfinancial asset in which ownership of the asset transfers to the government by the end of the contract	Financed Purchase (capital asset and debt)
Operating or maintenance of a capital asset	Expense

Implementation Timeline and Instructions



Steps to Implement GASB 94 and 96



- 1. Gather potential contracts to evaluate
- 2. Gather key data to determine the lease term and whether they meet the capitalization threshold
- 3. Determine which lease contracts meet the definition of a SBITA, or potentially a PPP or APA
- 4. Submit Inventory to <u>Anna.Quichocho@ofm.wa.gov</u>, and cc your accounting consultant.



OFM is not expecting agencies to make a final determination as to the applicability of GASB 94, but only to identify arrangements that could meet the definition of a PPP or an APA.

- Fill out the contract inventory as completely as you can
- Gather and retain documentation that would assist in OFM and your agency making the final decision

Leases, SBITAs, and PPPs

Leases - GASB 87

Subscription-Based Information Technology Arrangements (SBITAs) - GASB 96

Public-Private, Public-Public Partnerships (PPPs) - GASB 94

Facilities Portfolio Management Tool

By April 30, 2022, agencies must record all leases within the scope of GASB 87 that exceed the capitalization threshold (\$500,000 in total lease payments over the lease term) in the <u>Facilities Portfolio Management Tool (FPMT)</u>. This is in addition to the requirement that has existed for several years to record all state-owned and leased facilities in FPMT regardless of whether they meet the capitalization policy, to comply with RCW 43.82.150. This <u>Lease Data Matrix</u> shows the accounting and FPMT data entry requirements for lease contracts.

Beginning in fiscal year 2023, subscription-based IT arrangements within the scope of GASB 96 that exceed the capitalization threshold (\$1,000,000 in total payments over the subscription term) in FPMT. Review the <u>SBITA (GASB 96) Overview and Checklist to Implement</u> for more details.

Training

- Leases Accounting & Administrative Policies (60 minutes)
- <u>Accounting Transaction Options for Right-to-Use Leases (15 minutes)</u>
- Lease Disclosure Form (10 minutes)
- Overview of Leases and the Facilities Portfolio Management Tool (PDF)
- <u>Frequently Asked Questions (FAQs)</u>

Resources

Is the contract a Lease, SBITA, or PPP?

- <u>Contract Inventory Template and Contract Analysis Tool</u>
- GASB 87 Decision Tree for Lessees
- GASB 87 Decision Tree for Lessors
- Lease Accounting Decision Tree (PDF)

- 1. Request access to FPMT and the accounting role
- 2. Add Other Assets and Other Asset Contracts for SBITAs and any PPPs and APAs
- 3. Review the Amortization Schedule for each contract
 - Verify the liability and asset balance is zero at the end of the term on the report



3. Reconcile and Record Year-End Adjusting Entries

If your agency is **manually recording accounting entries**:

- 1. Using reports from FPMT, record the year-end adjusting entries:
 - Record amortization expense on the asset
 - Reclassify payment expenses to principal and interest
 - Reduce SBITA liability based on principal paid during the year
 - Reclassify portion of liability to short-term based on amount of principal due within next year
 - For proprietary funds, accrue payable for interest due in July
- 2. Use reports from FPMT to verify AFRS balances
- 3. Investigate and correct any differences



4. Complete FY2023 Disclosure Forms

- Changes in FY 2023
- SBITA disclosures will mirror those for the leases
 - 1. Future subscription payments broken out between principal and interest
 - 2. Future SBITA Commitments
 - 3. Liabilities by Major Class
 - 4. Capital Asset
- PPP disclosures will be collected via spreadsheet
- APAs should be no change if already accounting for as financed purchase



5. Continue Updating FPMT & Recording Entries

- 1. Continue to update FPMT as lease contracts are renewed, executed, amended, or terminated
- 2. Continue to record the necessary accounting entries, and prepare reconciliations between FPMT and AFRS



Facilities Portfolio Management Tool (FPMT)



System Requirements (SAAM 30.40.30):

- Use the Capital Asset Management System (CAMS), or approved alternate in-house system for:
 - 1. Owned assets that meet the state's capitalization policy
 - 2. Lease-to-own agreements that meet the state's capitalization policy
- Use the Facilities Portfolio Management Tool (FPMT) for:
 - 1. All owned and leased facilities, regardless of whether they meet the capitalization policy, to comply with RCW 43.82.150.
 - 2. Right-to-use lease agreements and SBITAs that meet the state's capitalization policy

FPMT Demo

Facilities Portfolio Management Tool (FPMT) Demo

GORPM > Washington State - Facilities Portfolio Management Tool



Sign in with
ADFS
Reset ADFS
or

FPMT System Overview

Web-based Application

- Preferred Browsers: Chrome or Firefox
- Two sign-in options:
 - Single sign-on through Active Directory
 - Outside State Network: username/password
 - Required to change your password every 90 days

Hierarchy

- Tables above related to the tables below
- Data in the tables above are common to the data in the tables below

Sample Table Hierarchy – Leased Facilities



GORPM > Washington State - Facilities Portfolio Management Tool



Sign in with



Home Screen

- Upon logging in, the "landing" page is the Home screen
- The Home screen has modules or "module tiles" such as
 - Data Explorer
 - Reference Documents
 - My User Account
- The modules are permissions driven



My User Account

From the Home screen, click the Open button on the My User Account module tile

Manage your user profile and security settings

- Change Password
- Change security questions
- Edit information
- Review your Roles/Permissions

My User Account Manage your user profile and security settings
GoRPM Washington State - Facilities Portfolio Change my password Change how I sign in
Change my security questions Edit my information
First name Laurie Last name Wood
Phone (360) 819-9842 Title OFM Facilities Inventory and GIS Data Administrator
Account created on July 3, 2017 10:56 AM
Account last signed on April 24, 2019 3:36 PM
Roles Agency Import OFM Facilities Administrators Reference Documents Read/Write User Manager

FPMT - Data Explorer

Data Explorer is the module to search, analyze, and drill down into your data



- Starting Point will always be the State of Washington
- Data list on the left
- Map on the right
- Data in the Tile List on the left that has geometry associated with it is displayed in the map on the right



- Displays the context of where you are in GoRPM, such as:
 - Starting Point
 - A particular level in the table structure
 - Search results
 - Selection



- A Data Tile represents a single record in a table
- The Tile List contains a set of Data Tiles grouped by specific table
- Examples may include agencies, facilities, etc.



Related records are linked in FPMT

• New tables are added from the table record above

lanage	Facility Details		
Select Documents (0)	Unique Facility ID A21552		
Open Photos (0)	Ownership Type Owned - A facility that	t is owned by a state agency.	
Add Reports	Primary Address		
Leased Facility	Secondary Address W	Vhat would you like to do?	
OF Owned Facility	Alternative Address	OF Owned Facility	
REF Receivable Leased Facility	City Olympia	Create a new Owned Facility	
	City - Out of State	Link to an existing Owned Facility	

Data Explorer Toolbar – Search Button

- Data Explorer offers two types of searches:
 - Text
 - Geographic
- At this level you can search across all data related to the context you're viewing
- Type your search query in the Search bar to return entities that meet the specified criteria
- Use double quotation marks (e.g., "first floor") around a phrase to restrict a search to an exact phrase
- Leave off quotes to return all items



Search		
Search all Filter by ▼		
SEARCH	Explain	Clear All

Search		
"floor"		ABC 🕥
Filter by 🗸		
SEARCH	Explain	Clear All

Data Explorer Toolbar – Search: Filter By

- You may filter the results of a search
- Click the Filter by hyperlink on the Search box
 - Displays filter options
 - Add a desired type to filter by
- You have the option to click the Close button (to the left of the entity, circled in red) to remove a Filter by from the search
- Clear All clears all data in the search bar and clears all filtered items



Data Explorer Toolbar– Search: Lease Contract

- Click Search icon
- Type lease number in the text field with quotation marks around it
- Click the Search button

=	GoRPM > Washington Stat	e -
History Q	Search Filter Selections	
≡ 🚱 Se	earch	⊗
ABC	e ▼ "SRL 14-026"	
FLC Filte	r by -	
	SEARCH Explain Clear All	

Data Explorer Toolbar – Search: Refine By

- After choosing item(s) to filter, use the **Refine by** hyperlink to further refine your search
- Refine by Attributes associated with the Entity
- For example, by name, date, or size, etc.



Data Explorer Toolbar – Search: Facility

- Click Search icon
- Click Filter by Facility
- Click Refine by Primary Address
- Choose Contains
- Type partial address in the text field
- Click the Search button


Data Explorer Toolbar – History Button

- The History button opens a list showing where you have navigated within Data Explorer
- You have the option to select something from the list to navigate to that point
- The Go Back button allows you to navigate back one item, to the previous location





FPMT Reports for Accounting Entries

Report Name	Description	FPMT Tile to Run on
Amortization Schedule	Lease contract amortization schedule of lease liability (showing portion of each payment related to principal and interest) and monthly amortization of lease asset	Lease Contract
Lease Accounting Activity	Displays principal, interest, and amortization expense for the fiscal year for all lease contracts	Agency
Summary Lease Accounting	Displays balances of lease liability, lease asset and the related accumulated amortization as of the end of the month for all lease contracts	Agency
Future Lease Payments	Displays future lease payments for the next five years and in five-year increments thereafter for note disclosures	Agency

FOR MORE INFORMATION:

<u>https://ofm.wa.gov/accounting/administrative-accounting-</u> <u>resources/leases-sbitas-and-ppps</u>

<u>https://ofm.wa.gov/it-systems/facility-system/facilities-</u> portfolio-management-tool-fpmt

Anna Quichocho, CPA Statewide Financial Consultant <u>Anna.Quichocho@ofm.wa.gov</u>

