

September 02, 2014

Mr. David Bean
Director of Research and Technical Activities Project No. 34-1E
Governmental Accounting Standards Board
401 Merritt 7, PO Box 5116
Norwalk, CT 06856-5116

Dear Mr. Bean:

Thank you for the opportunity to provide comments in response to the Governmental Accounting Standards Board (GASB) invitation to provide comments on its Exposure Draft, Accounting and Financial Reporting for Postemployment Benefits Other Than Pensions. Paulding County Hospital is a participating-employer in the Ohio Public Employees Retirement System (OPERS or the System), a cost-sharing multi-employer plan with approximately 3,700 employers.

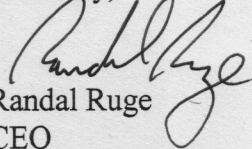
The Exposure Draft addresses changes in the way participants in government sponsored postemployment benefit plans, other than pensions, account for and report associated assets and liabilities in their annual financial statements. OPERS offers postemployment health care that falls under the scope of this Exposure Draft. We believe the changes would have an unfair and severe adverse effect on our financial statements. In turn we will lose credibility with our public, our financial institutions, and our very existence could be threatened.

As a 25 bed government hospital in rural America we are already challenged to maintain a positive bottom line. If adopted, these changes will surely result in a balance sheet with negative digits. These changes place an unfair burden on government facilities.

Imagine the impact on corporate America if corporate balance sheets had to reflect the potential unfunded liabilities of Social Security and Medicare. We would face a repeat of the Great Recession if not the Great Depression.

Please delete the requirement for carrying liabilities of postemployment benefit plans on our balance sheets. Thank you in advance for your careful consideration.

Sincerely,



Randal Ruge
CEO