



**Public Pension Financial Forum
c/o Teacher Retirement System of Texas
1000 Red River
Austin, Texas 78701
512 542-6405**

February 15, 2007

Jake Lorentz, Assistant Director of Technical Services
Government Finance Officers Association
203 N LaSalle St, Suite 2700
Chicago, IL 60601-1210

Dear Mr. Lorentz:

The Executive Board of the Public Pension Financial Forum (P2F2) is requesting that the Government Finance Officers Association (GFOA) reconsider the requirement that a signature of at least the chief financial officer be included in the checklist used to grade a government's Comprehensive Annual Financial Report as part of the Certificate of Achievement for Excellence in Financial Reporting.

P2F2's purpose is to promote and foster excellence in public pension plan financial operations. P2F2 has over one hundred members in over 60 public pension plans throughout the United States. For more information on our organization please refer to our website at www.p2f2.org.

The Board of P2F2 is concerned with the inclusion of an actual signature within the CAFR. It is considered a best practice in fraud prevention to remove the signature from an organization's annual report. In the Union Bank of California publication "Frank W. Abagnale's Check Fraud, Identity Theft and Embezzlement Volume II" it states, "Annual reports should not contain the actual signatures of the executive officers. Forgers scan and reproduce those signatures on checks, purchase orders, letters of credit, and other negotiable documents."

With the advent of the Internet and the encouragement of GFOA in their 2003 recommended practice "Using Websites to Improve Access to Budget Documents and Financial Reports", we find that most of our member governments have included their CAFR, as published, on their websites. These CAFRs typically include the signature that can be easily lifted from the online documents for fraudulent purposes. The Board of P2F2 strongly urges the GFOA to remove the requirement of a governmental officers' signatures in the CAFR and would be willing to further discuss this issue at your convenience.

Thank you for your assistance in this matter.

Tony C. Galaviz, President
Public Pension Financial Forum
c/o Teacher Retirement System of Texas
1000 Red River Street
Austin, TX 78701-2698