# Multiemployer employee benefit plans

The AICPA Employee Benefit Plan Audit Quality Center (EBPAQC) has developed this primer to provide members with a basic understanding of multiemployer employee benefit plans. This primer provides a general overview of multiemployer plans and includes discussions of applicable laws and regulations, plan structure and operations, funding, unique aspects of multiemployer plan assets and obligations, parties in interest and prohibited transactions, and plan expenses, and provides references to additional resources.

## Introduction

A multiemployer plan—typically referred to as a "Taft-Hartley" plan—is an employee benefit plan that is maintained pursuant to one or more collective bargaining agreements (CBA) between two or more contributing employers (or a group association of employers) and a labor union. A multiemployer plan typically has participating employers located within the same geographic area and operating in the same industry, and allows employees in a unionized workforce to maintain eligibility for benefits when they move from one employer to another within the industry covered by the plan. Participants gain "credits" toward pension and other employee benefits based on work performed for employers in that industry. Multiemployer plans often are concentrated in industries with seasonal employment or high worker mobility, such as the building and construction trades. They also are common in industries with many small employers whose employees move from job to job—often within the same year—such as the retail, food, entertainment, trucking, garment manufacturing, maritime, mining and service industries. Multiemployer plans provide a wide variety of benefits for union workers, including pension and health and welfare benefits. The most common type of multiemployer plan is a defined benefit pension plan. There also are multiemployer defined contribution pension plans, including 401(k) plans, profit sharing plans, money purchase plans and annuity plans.

Multiemployer health and welfare plans take many forms, and may provide health care benefits, vision benefits, prescription drug benefits, life insurance, disability coverage, unemployment benefits, day care, scholarships, vacation benefits, legal services benefits and apprenticeship and training funds. Some of these benefits, such as life insurance, disability insurance, and health insurance, often are provided through insurance policies. Other benefits, such as health care, may either be insured or self-funded, or may be partially insured through stop-loss and other insurance coverage. Some plans provide coverage only while the participants are working for contributing employers, while many others provide retiree benefits, such as health insurance.

Many unions and their contributing employers sponsor apprentice programs to provide training and education to their newest members. Apprentice programs typically use a combination of hands-on and classroom instruction to teach the fundamentals of a given trade, including the equipment, techniques, and materials in order to provide a capable workforce for the related industry. Several apprentice programs also offer training to veteran employees to periodically upgrade their skills and knowledge. Most apprenticeship and training plans are collectively bargained, structured as jointly administered labor and management trusts, and by law are considered to be employee benefit plans.

Although multiemployer plans are similar to multiple employer plans in that both types of plans cover participants who work for more than one employer, they are not the same. Multiple employer plans are maintained by two or more employers for the purpose of pooling investments and sharing administrative

costs. Unlike multiemployer plans, multiple employer plans typically maintain separate accounts for each of the employers within the plan and are not subject to the terms of a CBA. This primer applies only to multiemployer plans; it does not address multiple employer plans.

Multiemployer plans differ from single and multiple employer plans in many respects, including applicable laws and regulations, plan structure and operations, governance by a board of trustees, portability of benefits, and funding and reporting and disclosure requirements. Other unique aspects of a multiemployer plan include investment monitoring and decision making, ownership or leasing of property and equipment, withdrawal liabilities, payroll audit compliance programs, shared expenses, purchases from participating employers, compensation to trustees and plan employees, and party in interest and prohibited transactions. These are discussed in more detail in this primer.

# Laws and regulations

Multiemployer plans are defined under the provisions of the Labor Management Relations Act of 1947, which is commonly known as the Taft-Hartley Act. The Taft-Hartley Act requires that plan assets be held in trust for the purpose of paying benefits exclusively for eligible employees and their families, the establishment of a joint board with equal representation from labor and management, that pension and welfare funds cannot be commingled, and an annual audit. In addition, multiemployer plans are subject to the provisions of the Employee Retirement Income Security Act of 1974 (ERISA), which requires plans to file an annual Form 5500, *Annual Return/Report of Employee Benefit Plan* (Form 5500), with the U.S. Department of Labor (DOL) and establishes standards for participation, vesting and benefit accruals, along with rules that all fiduciaries of the plan, including the trustees, must follow. Further, these plans must comply with the provisions of the Pension Protection Act of 2006, which requires that they send annual funding notices to plan participants and the Pension Benefit Guaranty Corporation (PBGC), and other relevant laws.

Multiemployer plans also are subject to rules and regulations enforced by the DOL, the Internal Revenue Service (IRS), and the PBGC. Defined benefit multiemployer pension plans must pay a premium to the PBGC for each plan participant. In exchange for the premiums, the PBGC provides a guarantee that certain minimum pension benefits will be paid to the participants and beneficiaries if the plan becomes insolvent.

Although the purpose and structure of apprenticeship and training plans are very different than other ERISA plans, apprenticeship and training plan trustees are still subject to the general fiduciary standards of conduct, and the plan must be operated in compliance with all ERISA and DOL requirements. A plan that exclusively provides apprenticeship and training benefits may file a notice in accordance with ERISA that provides exemption from filing an annual Form 5500.

Multiemployer plans are exempt from federal taxation as long as they maintain their tax exempt status under the Internal Revenue Code (IRC). The plan document must be amended or restated periodically to comply with the changing tax laws and IRS regulations. Multiemployer defined benefit pension plans are subject to minimum funding standards under the IRC. Multiemployer health and welfare plans typically are funded through a VEBA trust, which generally is exempt from federal income tax. The VEBA trust is required to file an annual return Form 990, *Return of Organization Exempt From Income Tax*, with the Internal Revenue Service.

This primer further addresses some additional DOL rules that are unique to multiemployer plans in the "Parties in Interest and Prohibited Transactions" section below.

# Plan structure and operations

Multiemployer plans are created by a labor union and two or more employers (or an association of employers) who agree to form a trust. The plans are jointly administered by a board of trustees, with half of the board representing the labor union, and half representing the contributing employers (often referred to as management trustees). The right of the labor union and the employers to appoint trustees to administer the plan is established in the trust agreement.

The board of trustees meets periodically to make decisions about operating and administering the plan. They hire plan professionals, including attorneys, accountants, actuaries, investment consultants and sometimes service organizations to provide administration or other services to the plan. While the bargaining parties

(labor union and individual employers) negotiate the contributions that will be made to the plan, the trustees determine the plan benefits and the rules governing the plan which are detailed in a written plan document that is revised periodically to maintain compliance with federal laws.

One key characteristic of multiemployer plans is the portability of benefits. Participants maintain eligibility for coverage when they change employers, as long as the new employer is covered by the CBA. This is particularly important in the building and construction trades, where employers hire workers for a construction project from a pool of workers supplied by the labor union. The employees work solely for that employer until the project is completed—which could be a matter of days, weeks, or months—then return to the pool. As such, the employee may work for multiple employers within the plan in the same month.

Many multiemployer plans covering workers in the same industry enter into reciprocal agreements to provide coverage for union workers who seek work outside their home area when there isn't work available in the area in which they live. For example, some multiemployer plans enter into agreements in which the employer contributions related to employees who find work outside of their home area are sent back to the plan covering the area in which the union member lives. Alternatively, union workers working outside their home area may actually receive credit for years of service worked on projects whose workers are covered by another plan.

Multiemployer plans generally utilize individually designed plan documents, as the desired provisions of the plan warrant a specific plan design that prototype and volume-submitter plans are unable to accommodate. Also, due to the nature of individualized plan documents and the evaluation of plan provisions on a continual basis by the joint board of trustees, the volume of amendments may be greater than in most single or multiple employer plans.

A significant number of multiemployer plans are self-administered or partially self-administered. These self-administered plans may be fully self-contained or may outsource only certain aspects of administration of the plan to a service organization. As such, it is quite common for multiemployer plans to have employees and thus also be considered an employer.

# Funding

As with many other aspects of multiemployer plans, the funding is unique. Unlike a single employer plan where employer contributions are made at the employer's discretion or determined by actuarial calculations, employer contributions to a multiemployer plan are determined through the collective bargaining process and stipulated in the CBA.

Multiemployer plans may be funded from both employer and employee contributions, and the funding and collection of contributions must be monitored. This section addresses the various funding sources as well as the monitoring activities performed by the plan trustees.

## *Contributions from employers*

Contributions from employers are dictated by the CBA. The CBA will specify the method for calculating the employer contribution and the required contribution rate. Contributions may be based on a flat amount, hours worked, hours paid, or a percentage of payroll. There may be multiple CBAs in effect, as well as tiered contribution rates for different classes of union members (e.g. journeymen, apprentices, etc.), resulting in many different contribution rates. Generally, employers are required to submit monthly reports listing the union members who worked for the company during the month, hours worked, and a calculation of the related monthly required contribution.

## *Dollar/hour banks and self payments*

Most multiemployer health and welfare plans require participants to work a minimum number of hours each month to maintain eligibility. This minimum number of hours is analogous to a monthly insurance premium. Under certain plans, hours worked or employer contributions received in excess of the monthly minimum may be "banked" to fulfill deficits in future months, which is especially common in the construction industry where work can be seasonal. These "hour banks" (or "dollar banks") are known as accumulated eligibility credits and are considered a benefit obligation of the plan. In addition, plans may also allow participants to make "self-

payments" to make up any shortfalls in monthly contributions not fulfilled through employer contributions made on their behalf or their hour/dollar banks in order to maintain health insurance coverage. Health and welfare plans also may receive self-payments from retirees.

Some multiemployer defined contribution plans also allow employee contributions, subject to certain limitations.

### *Withdrawal liabilities*

Defined benefit multiemployer pension plans may be partially funded through collections from employers related to withdrawal liabilities. Under the Multiemployer Pension Plan Amendments Act of 1980, employers that withdraw from an underfunded multiemployer defined benefit pension plan—either a complete withdrawal by an employer that permanently ceases to have an obligation to contribute under the plan or permanently ceases all covered operations under the plan, or a partial withdrawal in which the employer has a decline of seventy percent or more in contribution base units or a partial cessation of the employer's contribution obligation—may be assessed a share of the plan's unfunded liability. Special rules that limit the conditions under which a complete or partial withdrawal may occur apply to certain industries such as construction, trucking and entertainment. When a complete or partial withdrawal occurs plan fiduciaries are required to calculate the withdrawal liability, notify the employer, and collect the funds. An employer must make periodic payments based on its historical contribution levels until its withdrawal liability is settled.

### *Grants*

Some apprentice and training programs apply for and receive grants from governmental agencies or affiliated labor organizations.

### *Collection policies*

Plan administrators should have procedures established and documented to regularly monitor collection and communicate delinquencies to the employers, plan trustees, and legal counsel. The plan's collection policy generally describes the party responsible for monitoring collections, the date contributions are due to the fund, steps taken if contributions are not received by the specified due date, any liquidated damages assessed on late remittances, when legal counsel should be notified and under what circumstances an employer may request reimbursement for overpayments. The document also may address the plan's policy for selecting employers for payroll compliance audits, which are discussed below. It is common for plan trustees to delegate the responsibility for enforcing the collections policy to a subcommittee, made up of labor and employer trustees, the plan administrator, and the plan's legal counsel, that meets periodically to address collection issues.

### *Payroll audit compliance programs*

Payroll audit compliance programs, sometimes referred to as "payroll audits", comprise a plan's policies and procedures for testing participating employers' payroll records to ensure that contributions to the plan are complete and accurate. A payroll audit compliance program serves as a control by which the plan's fiduciaries can monitor the adequacy of employer contributions and demonstrate that they have been diligent in fulfilling their duties. It also provides a process for the plan's independent auditor to assess the reasonableness of employer contributions. These programs may be conducted as a part of the plan's overall collection policy. The procedures may be performed internally by a plan administrator or by an independent CPA firm.

Testing of employer payroll records is routinely performed to fulfill the responsibility trustees have to gather and protect plan assets, but testing may be performed in other circumstances as well. Often these are referred to as "for cause" or "special" audits. Examples include selecting a delinquent employer in order to quantify the amount owed to the plan; an investigation of complaints by participants that an employer is not properly reporting all employees performing work covered by the CBA; or a final audit of an employer that has elected to withdraw from the union in order to ensure that they have reported accurately through the date of the withdrawal.

# Unique aspects of multiemployer plan assets

## *Investments*

Investments are the most significant asset in a plan's financial statement. While in many ways investments owned by a multiemployer plan are similar to those in a single employer plan, there typically are significant differences in the areas of monitoring and decision making. In addition, because multiemployer plans can accumulate large asset balances, the plans may have access to investments not available to many single employer plans. It is very common for multiemployer plans to invest in alternative investments such as hedge funds, derivatives, and private equity funds and to participate in securities lending activities. See the "Additional Resources" section below for more information about resources related to alternative investments. Some plans invest in economically targeted investment vehicles that benefit the members of the union or unionized labor in general. This practice was more common in the past but still occurs today. Such investment decisions must satisfy ERISA regulations.

The members of the board of trustees can consist of union officials, union members, small business owners, management level employees of large companies, or directors of employer associations, the majority of whom have no professional investment background. As such, the board often will rely on service organizations to perform and monitor the plan's investment activities. Multiemployer plans typically utilize three types of service organizations related to investments: an investment consultant, investment managers, and an investment custodian.

An investment consultant may be engaged to assist the trustees in all aspects of investment oversight, including the development of investment policy and objectives, determination of asset allocation, trustee education, an investment manager search, and ongoing investment performance monitoring. The investment consultant is the key advisor to the board of trustees and is considered a plan fiduciary. Investment managers are hired to buy and sell investments on behalf of the plan.

An investment manager typically is an individual or a firm that makes investments in portfolios of securities on behalf of the plan, in accordance with the plan's investment policy. A multiemployer plan may have one investment manager or several dozen, depending on its needs and objectives. An investment manager may be responsible for all activities associated with the management of the plan's portfolio, from buying and selling securities on a day-to-day basis to portfolio monitoring, settlement of transactions, and regulatory reporting. Because of the discretionary authority given to the investment managers, they often are considered plan fiduciaries.

The investment custodian, typically a bank or financial institution, is responsible for holding and keeping safe the various investment assets of the plan. The custodian may hold assets of many portfolios managed by different investment managers. The custodian maintains records of the investments, including their fair value as well as all activity and transactions. Many times, however, the custodian does not actually "hold" the plan's alternative investment assets but merely serves as a record keeper for such vehicles.

While investment consultants make recommendations regarding plan investments, decisions ultimately typically are made by the board of trustees, or a subcommittee of the board of trustees. As such, decisions regarding alternative investment classes, new asset allocations, and engagement/termination of investment managers may take long periods of time to complete. Increasingly, plans are engaging investment consultants to perform full-fiduciary services whereby the board of trustees delegates some or all investment decision-making authority to the investment consultant, including decisions regarding asset allocation and the hiring/firing of investment managers. Even in situations where an investment consultant is hired to perform full-fiduciary services, the board of trustees is responsible for periodically monitoring the consultant to ensure it is properly performing the services.

## *Property and equipment*

Because many multiemployer plans are self-administered or partially self-administered, it is not uncommon for multiemployer plans to own property and equipment that are not considered plan investments. These plans may purchase buildings and fixed assets for use in operating the plan's administrative office. It also is common for apprentice and training plans to own a building in which training is conducted. Some of these buildings may have been constructed by the plan and, as such, the plan may have a related construction loan

from a financial institution. In addition, a plan may lease office space, office equipment or training facility space.

### *Cash*

Many multiemployer plans maintain cash balances with financial institutions to facilitate basic plan transactions such as contribution collection and payment of benefits and expenses.

## Unique aspects of multiemployer health and welfare plan benefit obligations

Benefit obligations represent the cost of the future benefits "promised" by the plan and earned by the participants up to the measurement date. The fact that benefits may be reduced or even eliminated by the plan trustees as they deem appropriate ordinarily would not affect the promise made as of the end of the plan year unless certain criteria are met (for example, an amendment is in place or has been communicated to employees). Benefit obligations are calculated based on claims experience, health trends and demographic information maintained by the plan, its third party administrator, or both.

Most multiemployer health and welfare plan benefit obligations are similar to those of single and multiple employer plans, including claims payable, insurance premiums payable, and claims incurred but not reported (IBNR). Multiemployer plans also may offer postretirement benefits, which some single employer plans offer as well. One benefit obligation that is unique to multiemployer plans is accumulated eligibility credits.

Plans may provide for the payment of insurance premiums or benefits for a period of time for those participants who have accumulated a sufficient number of “eligibility credits” or hours. Such accumulated eligibility credits allow participants continued health coverage in periods when they may not have worked the minimum required hours to maintain coverage. Depending on the plan, accumulated eligibility credits commonly take the form of hour banks or dollar banks. For example, a plan may permit participants who work more than 300 hours during an eligibility period to "bank" the excess hours. These banked hours may then be used in future eligibility periods when a covered member has not worked the minimum required hours. The following illustrates the hour bank concept:

> A covered member works 500 hours during the eligibility period of July, August and September. The first 300 hours are applied to the “coverage period” of November, December and January. The participant banks the remaining 200 hours. During October, November and December the covered member works 200 hours, which are applied to the coverage period of February, March and April. To remain eligible for full benefits during the February, March and April coverage period, the participant would use 100 of his banked hours, leaving 100 banked hours for use in future coverage periods.

Dollar banks generally work in the same manner as hour banks, but the hours are converted to a dollar value, and the dollars are used to provide continued coverage.

## Parties in interest and prohibited transactions

Parties in interest to a multiemployer plan include the plan’s trustees, administrator, employees, service providers, related union, participating employers, employer associations, related plans, and a relative of an individual considered to be a party in interest. For this purpose, a “relative” is a spouse, ancestor, lineal descendant, or spouse of a lineal descendant.

Multiemployer plans commonly participate in transactions with parties in interest that are unique to those plans. Under ERISA, transactions between a plan and a party in interest, including a contributing employer, are prohibited unless specifically exempted. The most common of these transactions include leasing of office space, sharing of expenses, and purchases of goods and services. Following are examples of some party in interest transactions seen in multiemployer plans that generally are exempt from the prohibited transactions rules.

### Plan contributions

While plan fiduciaries are expected to collect all contributions owed to the plan by participating employers, it is fairly common in a plan with a large number of contributing employers that one or more employers fail to make contributions to the plan when due. Such situations may require that the plan negotiate payment arrangements with those employers, which ordinarily would be considered a prohibited transaction under DOL regulations. However, the DOL provides a class exemption from the prohibited transaction rules to multiemployer plans that implement reasonable, diligent and systematic collections procedures.

### Leasing arrangements with a party in interest

Plans frequently lease office space from a related union, related plan or contributing employer. The DOL's *FAQs on Multiemployer Plan Leasing Arrangements* offers guidance on how to structure such a lease to prevent the plan from entering into a prohibited transaction.

### Shared expenses

Transactions between plans with common trustees generally are prohibited transactions. However, the DOL has issued various class exemptions permitting plans to share administrative services and office space with related plans and other parties in interest. Allocations of shared services and expenses are expected to be made based on objective time and space studies, updated at least annually and approved by the trustees of the plan. For shared office space, the plan should establish the reasonableness of the rent, such as comparing the property to the current rental market.

### Purchases from contributing employers

It is not uncommon for an apprenticeship training plan to purchase tools and materials used in its training program from a contributing employer. The DOL provided a class exemption to allow such purchases of property from a contributing employer for no more than fair value. The class exemption does not provide relief regarding self-dealing, unless certain conditions are met. For example, many times the apprenticeship training plan purchases materials for training from a contributing employer who employs (or is owned by) a trustee of the apprenticeship training plan. In order for such a transaction to be exempt, the trustee affiliated with the contributing employer cannot participate in the decision to purchase from such contributing employer. In addition, the apprenticeship training plan should either have a policy which provides that the apprenticeship training plan not purchase from any contributing employer that employs a trustee or that those trustees recuse themselves from all considerations by the plan if their employer is potentially a party to the transaction. Such decisions and actions should be documented in the minutes of apprenticeship training plan trustee meetings.

### Payments by service providers

ERISA includes regulations regarding both direct and indirect transactions between a plan and parties in interest. Therefore, any compensation (both cash and non-cash) made to a trustee or plan employee by a service provider is also subject to the prohibited transaction rules and related exemptions. In general, payments by a service provider of personal expenses are prohibited, including payments of airfare, lodging, meals, refreshments, entertainment and hotel expenses from a provider, gifts such as reduced fees for personal bank accounts, personal investment advice, preparation of personal income tax returns for no charge, and use of vacation property. Further, the receipt of gifts and gratuities may even represent a criminal violation by the trustee and/or service provider, depending on facts and circumstances.

## Plan expenses

Multiemployer plan fiduciaries must comply with standards set forth in ERISA regarding expenses administering the plan. The reasonableness of plan expenses is determined by the circumstances and is based on what a fiduciary would prudently expend in like circumstances for the sole and exclusive interest of participants and beneficiaries (the "reasonableness standard"). Because of the unique nature of multiemployer plans, certain plan expenses may be incurred that would not be incurred by single employer plans.

### Trustee and administrator compensation

ERISA provides that a plan fiduciary may receive reasonable compensation from a plan for services rendered to the plan as well as reimbursement for reasonable "direct expenses" properly and actually incurred in the performance of duties for the plan and not otherwise reimbursed. However, a fiduciary who is already receiving full-time pay from an employer, employer association or a union whose members participate in the plan, may only receive reimbursement for reasonable "direct expenses."
Because of the prohibition against acts of self-dealing, a trustee who is able to be compensated (because he or she is not receiving full time pay) should not take part in the decision whether to pay compensation to trustees or the amount of the compensation, even though the payment of the compensation itself would be permitted. Likewise, a plan administrator should not establish his or her own compensation or take part in the compensation decision.

### Compensation to plan employees

The reasonableness standard discussed above also applies to compensation for plan staff. A compensation package for a plan employee typically includes more than just the salary paid. For key positions, in addition to ordinary fringe benefits, the compensation package may include benefits such as a car, non-qualified retirement arrangements, bonuses, severance arrangements, and travel arrangements. The individual components of the package may be permissible so long as the compensation is reasonable and necessary, and the trustees have documented that their determination included a consideration of how the expense benefits participants and beneficiaries.

### Graduation ceremonies

Due to the nature of many apprenticeship and training programs, a graduation ceremony, and while not appropriate for an ERISA plan in general, may be appropriate for an apprenticeship training plan under certain circumstances. In general, the apprenticeship training plan may pay for a modest graduation ceremony but the plan may not pay for excessive or elaborate expenses.

### Promotion Expense

Expenditures for marketing and promotion must be limited to marketing or promoting the plan itself. Expenditures by an apprenticeship training plan, for example, for the advancement of the industry, contributing employers or the union are not allowable. Payments by a plan for the purchase of tickets to sporting and other entertainment events, gifts, charitable donations, and staff holiday parties generally are not permissible (see exceptions in "Gifts and Donations" section below).

### Travel and meeting expenses

While the plan's reimbursement of direct expenses incurred by trustees or employees for travel and expenses related to plan business is permissible as long as the expenses are both necessary and reasonable, the payment of any related personal expenses is prohibited under ERISA. The DOL has challenged plan reimbursements to trustees and administrators for movies, health club fees, massages, spa fees, medications, magazines, newspapers, gift shop purchases, entertainment, cigars, alcohol, bottled water, toiletries or similar items or services and, of course, any expenses for spouses, family or guests. Dry cleaning and laundry services also generally are considered personal expenses. Recreational expenses—even if included with the conference registration fees—such as golf, plays and sports events generally are considered personal expenses
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To be considered a reasonable expense, trustees or plan employees may only receive reimbursement for days during which they are actually in attendance at a meeting. When appropriate, the day before and the day after the meeting, as needed for travel, may also be considered reasonable. If meeting attendees are located within a single region or city, the meeting should be held in that region or city unless there is some reason to benefit participants and beneficiaries that the meeting must be held elsewhere, and this reason is documented by the plan trustees.

Because thorough substantiation of travel and meal expenses provides evidence that the plan is meeting the exemption requirements for these reimbursements, many plans adopt a written expense policy. Appropriate

guidelines in an expense policy would include a requirement for providing sufficient detail of expenses incurred.

### Gifts and donations

ERISA requires that plan assets be expended for the exclusive purpose of providing benefits and defraying reasonable administrative expenses. In some circumstances where it is documented that the trustees determined that a kindness to a participating sponsor's employee(s) benefits plan participants (for example, by upholding staff morale and as a result, improving productivity and staff retention), expenses such as those for flowers or gifts in cases of retirement, illness or death may be permissible plan expenses. Similarly, staff luncheons, holiday parties and other social events may be acceptable if such expenses were reasonable and necessary for the operation of the plan and for the exclusive benefit of participants and beneficiaries and were documented as such. Gifts or retirement parties to or for trustees paid by either the plan or a service provider generally would be considered prohibited transactions.

## Additional resources

**FASB ASC 960*, Plan Accounting—Defined Benefit Pension Plans;* 962, *Plan Accounting—Defined Contribution Pension Plans; and* 965, *Plan Accounting—Health and Welfare Benefit Plans,*** provide the reporting and disclosure requirements for employee benefit plans.

**FASB ASC 820*, Fair Value Measurements,*** provides a framework for measuring fair value, and specifies required disclosures about fair value measurements.

**AICPA Audit and Accounting Guide, *Employee Benefit Plans***, gives guidance on auditing plans and provides illustrative financial statements, including notes, for various types of plans.

**Annual AICPA Audit Risk Alert, *Employee Benefit Plans Industry Developments***, highlights the hot topics in the employee benefit plans industry, including current issues related to multiemployer plans.

**AICPA Technical Practice Aids, *Technical Questions and Answers, TIS Sections 6931-6939,*** address frequently asked questions about various employee benefit plan related topics.

**AICPA Audit Guide*, Special Considerations in Auditing Financial Instruments,*** provides background information and a discussion of audit considerations relating to financial instruments.

**AICPA Alternative Investments - Audit Considerations, A Practice Aid for Auditors*,*** includes an example confirmation for alternative investments, illustrative examples of due diligence, ongoing monitoring, and financial reporting controls as well as practical advice in auditing these investments.

***AICPA AU-C Sec. 620, Using the Work of an Auditor's Specialist*,** addresses the auditor's responsibilities relating to the work of an individual or organization possessing expertise in a field other than accounting or auditing when that work is used to assist the auditor in obtaining sufficient appropriate audit evidence.

**AICPA *Employee Benefit Plans Accounting Trends & Techniques,*** provides illustrative disclosures for financial statements of employee benefit plans, including multiemployer plans.

**AICPA EBPAQC Primer*, Employee Benefit Plans—Parties in Interest and Prohibited Transactions,*** provides further general information about parties in interest and prohibited transactions.

**www.dol.gov/ebsa/apprenticeshipplans.html** provides valuable information on apprenticeship and training plan compliance and requirements.

**DOL *FAQs on Multiemployer Plan Leasing Arrangements,*** identifies and addresses two potential prohibited transaction issues: leases between a plan and a party-in-interest and acts of self-dealing or divided interests of plan trustees.

***DOL Field Assistance Bulletin No. 2012-01,*** addresses apprenticeship training plans using plan assets for graduation ceremonies and program marketing.

National Coordinating Committee for Multiemployer Plans, ***Trustee and Plan Expense Issues***, by Joyce A. Mader, http://www.nccmp.org/resources/pdfs/other/TrusteeExpPaper.pdf addresses many questions related to appropriate trustee and plan expenses.

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