March 17, 2015

Mr. David R. Bean  
Director of Research and Technical Activities  
Governmental Accounting Standards Board  
401 Merritt 7  
P.O. Box 5116  
Norwalk, CT 06856-5116  
Via email: drbean@gasb.org

Re: Project No. 3-24P

Dear Mr. Bean:

The Healthcare Financial Management Association’s (HFMA’s) Principles and Practices (P&P) Board appreciates this opportunity to comment on the Governmental Accounting Standards Board’s (GASB) preliminary views (PV) on Leases.

HFMA is a professional organization of more than 40,000 individuals involved in various aspects of healthcare financial management. In 1975, HFMA founded the P&P Board, a special group of experts to serve as the primary advisory group in the areas of accounting principles and financial reporting practices to meet the unique characteristics of health service organizations.

HFMA has long standing in its recommendation to the GASB to avoid differences between private-sector and public-sector standards that cannot be justified by fundamental or environmental differences between the two sectors. Accordingly, we are pleased of the Board’s efforts to reexamine public-sector lease accounting in the light of recent private-sector developments, both in the United States and internationally. It will be an imperative for the Board to clearly identify and justify any proposed disparities in any forthcoming exposure draft.

Thank you for the opportunity to comment. We are always ready to provide additional comments, or meet with you or members of your board to discuss this matter further. If we can provide additional material or perspective on this issue, please contact Richard Gundling, Vice President of HFMA’s Washington, DC office, at (202) 296-2920 ext. 605 or rgundling@hfma.org.

Sincerely,

Marc B. Scher, CPA  
P&P Board Chair