

January 13, 2015

Sent via email to: director@gasb.org

RE: Project No. 19-20E

Mr. David R. Bean, CPA
Director of Research and Technical Activities
Governmental Accounting Standards Board
401 Merritt 7
PO Box 5116
Norwalk, CT 06856-5116

Dear Mr. Bean:

We write to express our support for GASB's Exposure Draft on Tax Abatements. In an era of government austerity that is straining public services critical to economic opportunity and broadly shared prosperity, we believe it is critical that taxpayers and public officials have full access to records of all forms of public spending, especially those intended to create jobs.

As grantmakers, we support non-profit organizations serving low- and moderate-income Americans across the United States. They work on diverse issues including community and economic development, affordable housing, climate change, environmental justice, criminal justice reform, public education, workforce development, health care, family work supports, arts, culture, and aging.

State and local budgets are central to all of their work, for it is revenues such as those affected by tax abatements that fund the vital public investments and services necessary for people and communities to thrive. While we acknowledge that tax expenditures for economic development and other community benefits can be appropriate uses of government resources, we also hold that they should be just as transparent and accountable as the appropriated funding of education, infrastructure, and other public goods.

We also support those passages of the Exposure Draft that will have school boards and other bodies that lose revenue due to the actions of other governmental bodies report such losses. Both because education is a cornerstone of economic development and because taxpayers deserve clarity about the revenue effects of such intergovernmental transactions, this is a vital aspect of your proposed standard.

Thank you for the opportunity to offer comment.

Sincerely,

Clara Miller
President
F. B. Heron Foundation
Member, FASB Nonprofit Advisory Committee