

been 16 years since Ohio pioneered online disclosure). And our first analysis of large cities and counties found that a third of them already post online disclosure.

Just because jurisdiction has not posted such data online is not an indication that it lacks such records. Consistent with a reasonable person's expectations that any competent economic development agency would keep a database of its abatement expenditures, in our extensive history of filing Freedom of Information Act requests for such data, dating back to our first study's FOIA in 1998, we have yet to be told by an agency that it lacked such records.

However, even though online disclosure has become ubiquitous, there is still an enormous amount of variation in the amount of data made available from program to program within and among states.

At the very least, if the GASB cannot agree on the reporting of all abatement recipients, it should consider requiring that all abatements above a certain dollar value and/or share of program cost (e.g., two percent) be reported by name.

Presentation of Data

Because CAFRs are long, complicated documents, it is important that the new reporting on tax abatements be presented in a way that makes it easy for the user to find. We suggest that reporting entities be required to use a standardized table that stands out from the text and makes it easier to compare totals among jurisdictions. This approach would follow the model of the executive compensation summary table the Securities and Exchange Commission requires publicly traded companies to include in their annual proxy statements.¹⁸

We also suggest that the GASB incorporate these summary tables into its XBRL electronic financial reporting plans.

Conclusion

We hope our comments help the GASB to improve the Exposure Draft to better reflect the current state of affairs in economic development tax abatements. If the new standard captures abatements as outlined here, it will empower policymakers to make wiser decisions, taxpayers and investors to see spending more clearly, and scholars to generate a beneficial new body of analysis.

