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Director of Research and Technical Activities
Governmental Accounting Standards Board
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The New York State School Boards Association (NYSSBA) serves as the statewide voice for nearly 700 boards of education and 5,000 school board members across New York State. On behalf of our membership, NYSSBA offers comments on the GASB Tax Abatement Disclosures Exposure Draft released on October 20, 2014.

NYSSBA calls on GASB to make sure that, should such disclosure recommendations be adopted by GASB, they explicitly include traditional payments in lieu of taxes (PILOTs). PILOTs have had a long-standing impact on hundreds of school districts throughout New York State and make up the overwhelming majority of applicable tax abatements. School districts do not have any formal role in the negotiation and/or approval of local PILOT agreements, despite the fact that they directly, and sometimes substantially, impact school district tax revenue. This scenario is reflected in the exposure draft in paragraph 3(b) – “agreements entered into by other governments that reduce the reporting government’s tax revenues.”

The additional administrative work that would be required by school districts under this disclosure proposal cannot be understated. Schools submit hundreds of reports and filings to dozens of state, local and federal departments and offices. Should GASB eventually adopt a tax abatement disclosure statement, it should be worthwhile and productive. GASB should make it clear that traditional PILOT payments are to be included in such tax abatement disclosures.