

**From:** [Joyce Dillard](#)  
**To:** [FASAB](#)  
**Subject:** Comments FASAB Tax Expenditures: Management's Discussion and Analysis and Disclosure Requirements due 9.15.2016  
**Date:** Thursday, September 15, 2016 6:49:33 PM

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Question 1:

*Do you believe that these proposed disclosure requirements related to the notes to the financial statements in the CFR will be helpful to readers? Do you believe the placement of the proposed disclosures in the notes to the financial statements of the CFR is appropriate? Please explain the basis for your view and note any recommended changes in the requirements*

Comment:

Yes, since these expenditures are "hidden" in a sense, disclosure is a way of identification in relationship to assessing results or benefit to the policy intended. This result or benefit is difficult to ascertain without understanding, in plain language, of the policy allowance given

Question 2:

*Do you believe that these proposed requirements related to MD&A will be helpful to readers? Do you believe the placement of the proposed requirements in MD&A in the CFR is appropriate? Please explain the basis for your view and note any recommended changes in the requirements.*

Comment:

Yes, but it is still difficult to understand the overall benefit of such expenditures. One example is New Markets Tax Credit that involves many non-profit entities but pass-throughs to taxable entities including individuals. Benefits are difficult to distinguish from the intention.

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