



Virginia Government Finance Officers' Association

'Developing Governmental and Financial Leaders'

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December 6, 2011

The Governor's Task Force for Local
Government Mandate Review
c/o Ms. Susan Williams
Local Government Policy Manager
Department of Housing and Community Development
600 East Main Street, Suite 300
Richmond, Virginia 23219

Dear Ms. Williams:

I am writing on behalf of the Virginia Government Finance Officer's Association (VGFOA) to provide comment on several items included in the list of mandates the task force will consider on December 9. VGFOA appreciates the work of the Task Force and the opportunity to provide input.

The first item included in the list deals with Government Accounting Standards Board (GASB) reporting requirements. While these requirements are complex and time-consuming, regardless of the state's position, auditors and bond rating agencies will still review state and local finances in terms of GASB requirements. Generally accepted accounting principles for governmental organizations are promulgated by GASB. Deviating from those would risk a qualified audit opinion on state and local government financial statements, put their bond ratings in jeopardy and possibly impede the ability to issue debt.

Additionally, there are several items included on the list that deal with various aspects of the Comparative Cost Report maintained by the Auditor of Public Accounts (APA). This is a tool used by many local, state and other agencies and we do not feel it should be eliminated in its entirety. We do believe it should be reviewed to determine if there is an opportunity to modify the reporting requirements to make classification of revenues and expenditures more consistent between jurisdictions and to change the submission date so there is less conflict with the independent audits. Given the complexity of the report and short amount of time between now and the General Assembly session, perhaps it would be appropriate to ask the APA to work with a group of local officials over the next year to determine how the process might be improved.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads 'Patricia Weiler'.

Patricia Weiler
President