

October 23, 2008

Director of Research and Technical Activities  
Project No. 33-1  
Email: [director@gasb.org](mailto:director@gasb.org)

Dear Director:

On behalf of the Illinois Government Finance Officers Association, the Technical Accounting Review Committee (TARC) appreciates the opportunity to provide comments on the Governmental Accounting Standards Board's (GASB) exposure draft (ED) on concepts related to the Hierarchy of Generally Accepted Accounting Principles for State and Local Governments.

Per statement on auditing standards number 69, the GAAP hierarchy has historically been defined as numeric levels of authority. They are Level 1 thru Level 4 and a fifth level, labeled "Other Sources" which previously included Concepts Statements, pronouncements of the FASB not otherwise applicable, textbooks, position papers of professional organizations and articles.

In this exposure draft you are proposing a different nomenclature within the GASB statement. We would suggest in the interest of consistency and in the hope of eliminating any potential confusion that you consider changing from your proposed a-d naming convention and revert to the historical Level 1 – Level 4 and Other Sources as per SAS #69. We would also suggest that it would be helpful to users if you could incorporate, perhaps in an appendix a table that visually illustrates the five levels and what sources are in each level. Such tools are very helpful.

We appreciate the invitation to comment and would be pleased to discuss this letter with you at our convenience. If you have questions on our comments, please contact me at 847-599-7500 or [tinas@village.gurnee.il.us](mailto:tinas@village.gurnee.il.us) .

Sincerely,

Tina M. Smigielski, C.P.A., Chair  
Illinois GFOA  
Technical Accounting Review Committee