



The Association of
Accountants and
Financial Professionals
in Business

December 29, 2017

Director of Research
2017 Public Comment Period
Sustainability Accounting Standards Board
1045 Sansome St., Suite 450
San Francisco, CA 94111

Dear Director,

The Small Business Financial and Regulatory Affairs Committee (SBFRC) of the Institute of Management Accountants (IMA) appreciates the opportunity to add our view regarding the proposed Sustainability Accounting Standards Board (SASB) Sustainability Standards.

The IMA is a global association representing more than 90,000 accountants and finance team professionals. Our members work inside organizations of various sizes, industries, and types, including manufacturing and services, public and private enterprises, not-for-profit organizations, academic institutions, government entities, and multinational corporations.

The SBFRC addresses issues that impact small and medium-sized organizations. On behalf of IMA's members, the SBFRC engages and suggests solutions to standard-setters and regulatory agencies such as the Financial Accounting Standards Board (FASB), Securities and Exchange Commission, International Accounting Standards Board (IASB), Small Business Administration, American Bankers Association, Internal Revenue Service, and others. Information on the committee and past comment letters can be found at www.imanet.org/about-ima/advocacy-activity/small-business-financial-andregulatory-affairs-committee.

We have previously submitted (on April 15th, 2017) a comment letter to your Technical Director and to your general comments site. Our comments were on the nature of the SASB standards in relation to Small Business. We have not received acknowledgement of the receipt of this letter nor have we received a response of any kind to this letter.

Our letter analyzed the effects that these standards would have on Small Business. It gave a variety of examples. It then went on to give ideas on the ways in which the interests of Small Business could be represented within the

10 Paragon Drive
Suite 1
Montvale, NJ 07645
www.imanet.org



The Association of
Accountants and
Financial Professionals
in Business

SASB structure. We had hoped that these ideas would be treated as having been given both in sincerity and in good faith.

It is our hope that you can find a way to implement some of these suggestions and, by doing so, integrate the interests of Small Business into SASB governance and procedure. Small business does represent a considerable portion of both workers and revenue in current economies, both foreign and domestic.

We appreciate your consideration of these comments. We are available to discuss our views.

Respectfully,

A handwritten signature in black ink that reads "Gerald S. Silberstein". The signature is written in a cursive style.

Gerald S. Silberstein, PhD, CPA, MBA, CMA
Chair, Small Business Financial and Regulatory Affairs Committee
Institute of Management Accountants
(518) 292-8628
silbeg@sage.edu

10 Paragon Drive
Suite 1
Montvale, NJ 07645
www.imanet.org