August 7, 2018

Technical Director: File Reference No. 2018-250
FASB
401 Merritt 7; PO Box 5116
Norwalk, CT 06856-5116

Dear Technical Director,

Thank you for the opportunity to comment on the Exposure Draft of a Proposed Accounting Standards Update regarding the definition of collections. I am writing as the director of an accredited art museum and as a member of the American Alliance of Museums’ Direct Care Task Force, which produced AAM’s “Direct Care of Collections: Ethics, Guidelines and Recommendations” report in April 2016.

**Question 1: Should the definition of the term *collections* include the concept of direct care? If not, why not?**

I am in favor of modifying the definition of *collections* to include direct care, which is in keeping with the findings of the Direct Care Task Force.

**Question 2: Should there be a requirement to disclose an entity’s policy for use of proceeds from deaccessioned collections? If not, why not?**

I am in favor of a requirement to disclose the policy for use of proceeds from deaccessioned items.

I support the Code of Ethics for Museums and believe museums are educational organizations “grounded in the tradition of public service” and, as such, hold their collections for public benefit. Museums share an overarching responsibility for collections stewardship that “entails the highest public trust.”

The Leigh Yawkey Woodson Art Museum, accredited by the American Alliance of Museum, maintains a strict code of ethics and collections management policy, both of which explicitly state the limitations on the use of funds from deaccessioning.

**Question 3: Would the proposed transition requirement of prospective application with retroactive application permitted be operable and would it provide decision-useful information? If not, please explain why and what you would recommend.**

I am in favor of prospective application with retroactive application permitted.

**Question 4: Should the effective date of the proposed amendment be upon issuance of a final Update? If not, why not?**

I am in favor of the effective date being upon issuance of the final Update.

With thanks to FASB and its Not-for-Profit Advisory Committee for its thoughtful work.

Sincerely yours,

Kathy Kelsey Foley
Director