

Andrea Gyger

From: Barbara Larsen <brbooks@sharetrails.org>
Sent: Monday, September 17, 2012 11:33 AM
To: SoS Rulemaking
Subject: Charity rules

BlueRibbon Coalition, Inc.
Pocatello, Idaho

To the Secretary of State, on proposed rulemaking for charity registrations:

Thank you for asking for our suggestions and comments.

As a small national non-profit, we have found that submitting and renewing registrations with 40 different states during the course of the year to be very time-consuming.

Because about a dozen states (Colorado included) require filing a renewal on the same deadline as filing the IRS 990 (May 15th), we file for an IRS extension in early February and receive the official IRS extension permission about April 1st. We use this to apply to the twelve states for extensions. This results in a very tight time frame to coordinate all the states and their permission to extend the filings before their May 15th due dates.

In reality, the Executive Director delegates the state charity filings to the Office Manager, who delegates it to the bookkeeper. This same bookkeeper already must manage daily records, accounts payable, payroll, and, at the same time, prepare the prior year's bookkeeping records for the accountant to be able to file the 990.

Our audit and 990 are prepared by an independent accountant who is busy doing individual taxpayers' taxes until well after April 15th. Even then, we are not the top client on their list and often our 990 and audit are not done until August (even Nov 15th, in one case).

While your website does simplify our filing requirements with Colorado, we struggle to keep so many states' filing requirements, deadlines, and extensions in view and on track during the year while doing our regular bookkeeping activities. The fact that we cannot prepare even one state renewal until our 990 is complete only adds to the time constraints.

It would greatly simplify our time crunch if you had a simple online 6-month extension that we could apply for without needing, or even asking for, an extension from the IRS first. The accountant does these IRS requests and it adds another layer of difficulty to get copies of the papers we need from that office.

Please add a second or third email address for notices and renewal confirmations. Because the Executive Director is the primary contact, we must wait until he has received and forwarded your notices for us before we can act on them (as with this rule-making notice).

Thank you,
Barbara Larsen
BRC bookkeeper
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