

November 2, 2017

The Honorable Orrin Hatch, Chairman  
U.S. Senate Committee on Finance  
219 Dirksen Senate Office Building  
Washington, DC 20510

The Honorable Ron Wyden, Ranking Member  
U.S. Senate Committee on Finance  
219 Dirksen Senate Office Building  
Washington, DC 20510

The Honorable Kevin Brady, Chairman  
U.S. House Committee on Ways & Means  
1102 Longworth House Office Building  
Washington, DC 20515

The Honorable Richard Neal  
U.S. House Committee on Ways & Means  
1106 Longworth House Office Building  
Washington, DC 20515

Dear Chairmen Hatch and Brady and Ranking Members Wyden and Neal:

As your committees work toward a simpler, fairer tax code that benefits American families and encourages job creation and economic growth, ASAE and the attached list of associations respectfully urge you to keep in mind the implications of any changes to tax law for the nonprofit and not-for-profit sector. We urge you to protect the vital work that associations and other tax-exempt organizations perform across the nation and the world.

With more than 39,000 members, the American Society of Association Executives (ASAE) is the largest organization in the world representing the interests of associations. Our organizational members are trade associations and individual membership societies that represent almost every sector of the economy and countless professions. Together, our members represent 7,400 organizations and create a vibrant community that make the world smarter, safer, and better every day.

Non-dues revenue is critical for associations to survive financially and fulfill their tax-exempt purpose. That purpose is expressed through professional development and skills training, publications, credentialing, research, and charitable and community service. Associations build a stronger economy, enhance job skills, improve systems and structures, and strengthen lives. At the heart of our community are people – researchers, innovators, mentors, communicators – whose expertise and hard work collectively help to create a stronger America and world.

In 2016, there were 63,866 trade and professional associations on record with the IRS. These organizations employ 1.3 million people, generating an annual payroll of nearly \$51 billion. Despite their tax-exempt status, associations are by no means exempt from all taxes. Associations contribute substantially to national, state, and local economies across the country. Included among the taxes associations pay are federal payroll taxes, state and local taxes, real estate taxes, personal property

taxes, sales and use taxes, franchise taxes, taxes on lobbying activities, and taxes on unrelated business income (UBIT).

Within tax reform, potential changes to UBIT are of chief concern to the association community. Depending on various changes that may be considered, associations could be forced to make stark changes related to their activities and income sources, and may have difficulty continuing the work they do in communities across the country. Most associations depend on income from passive royalties to advance their tax-exempt purpose, and changes in this area could have broad and negative ramifications for the entire association community.

Associations make America stronger. In virtually every industry and sector, associations advance workers' job skills and create new employment opportunities. We implement programs and impact policies that strengthen America's safety and security – on roadways, waterways, jobsites, the Internet and everywhere in-between. As you finalize the difficult work of reforming the tax code, our request is that you consider the positive impact of our sector before making any changes to the tax code that would negatively impact our work.

Thank you for the opportunity to provide comments on this important issue. Please let us know how we can contribute in any way to this important discussion by contacting Jim Clarke, senior vice president of public policy, at 202.626.2865 or [jclarke@asaecenter.org](mailto:jclarke@asaecenter.org).

Sincerely,

The American Society of Association Executives  
(ASAE)

ABET

Academy for Eating Disorders

Access Marketing & Events

Advanced Medical Technology Association

Aerospace Medical Association

AIA Maryland, Inc.

Air Conditioning Contractors of America (ACCA)

Air Traffic Control Association (ATCA)

Airport Minority Advisory Council

Alabama Council of Association Executives

Alpha Omega International Dental Fraternity

Alpha Xi Delta's Women's Fraternity

American Academy of Neurology

American Academy of Nursing

American Alliance of Museums

American Alliance of Orthopedic Executives

American Animal Hospital Association

American Association for Laboratory Animal  
Science

American Association of Diabetes Educators

American Association of Neuromuscular &  
Electrodiagnostic Medicine

American Association of Radon Scientists and  
Technologists

American Bus Association

American Coatings Association  
American College Health Association  
American Composites Manufacturers Association  
American Concrete Pavement Assn.  
American Counseling Association  
American Dental Hygienists' Association  
American Farm Bureau Federation  
American Fraternal Alliance  
American Frozen Food Institute  
American Galvanizers Association  
American Group Psychotherapy Association  
American Industrial Hygiene Association  
American Institute of Architects  
American Malting Barley Association  
American Musicological Society Inc.  
American Physical Therapy Association  
American Quarter Horse Association  
American Society for Clinical Laboratory Science  
American Society for Clinical Pharmacology & Therapeutics  
American Society for Gastrointestinal Endoscopy  
American Society of Addiction Medicine  
American Society of Anesthesiologists  
American Society of Civil Engineers  
American Society of Clinical Oncology  
American Society of Home Inspectors  
American Society of Interior Designers (ASID)  
American Society of Radiologic Technologists  
American Society of Travel Agents  
American Traffic Safety Services Association  
American Veterinary Distributors Assoc.  
AMPED Association Management  
Anne Arundel County Association of REALTORS  
Asheville Home Builders Association  
ASIS International  
Association of Boards of Certification  
Associated Equipment Distributors  
Associated General Contractors of America  
Associated Logging Contractors - Idaho, Inc.  
Association Activision  
Association Executives of North Carolina  
Association for Behavioral and Cognitive Therapies  
Association for Middle Level Education  
Association for Research in Vision and Ophthalmology  
Association of Corporate Counsel  
Association of Government Accountants  
Association of Proposal Management Professionals  
Association of Women's Health, Obstetric & Neonatal Nurses  
Association Strategies Inc  
Associations North  
Aurora Regional Chamber of Commerce  
Automotive Fleet & Leasing Association (AFLA)  
AVIXA, The Audiovisual and Integrated Experience Association  
Book Industry Study Group  
Building Material Suppliers Association  
Calabrese Management

California Assisted Living Association	DHI Door Security and Safety Professionals
Capitol Hill Management Services	Diving Equipment and Marketing Association
Carolinas AGC	Door Security and Safety Foundation
CAWA - Representing the Automotive Parts Industry	Electrical Apparatus Service Association, Inc. (EASA)
Chicagoland Bowling Proprietors Association	Electronic Retailing Association
Child Neurology Society	Energy Equipment and Infrastructure Alliance
Commission on Rehabilitation Counselor Certification	Engineering Conferences International
Community Behavioral Healthcare Association of Illinois	Entomological Society of America
Concrete Foundations Association	Events Industry Council
Congress of Chiropractic State Associations	Fabricators and Manufacturers Association, International
Connecticut Chiropractic Council	Federal Managers Association
Connecticut Society of CPAs	Financial Services Institute
Consortium for School Networking	Financial Shares Corporation
Construction Management Association of America	Florida Association of Native Nurseries (FANN)
Construction Specifications Institute	Florida Chiropractic Association
Construction Specifications Institute Foundation	FPA of the East Bay
Consumer Technology Association	Georgia Food Industry Association
Cook-Witter, Inc.	Georgia Restaurant Association
Council for Advancement and Support of Education	Glass Packaging Institute (GPI)
Council on Foundations	Global Management Partners, LLC
Crossgates Management, Inc.	Global Risk Management Institute
Cure HHT	Government Executives International
Custom Management Group	Greater Alexandria Area Association of Realtors, Inc
Dennison & Associates	Greater Raleigh Convention & Visitors Bureau
Destination Marketing Association of the West (DMA West)	Group Foundation for Advancing Mental Health
	Hawaii State Chiropractic Association
	Health Cooperative Strategies, LLC

Healthcare Administrative Technology Association  
Hearth, Patio & Barbecue Association  
Hemp Industries Association  
HIGH IMPACT Mission-based Consulting & Training  
Home Builders Association of Metro Portland  
Illinois Chiropractic Society  
Illinois State Bowling Proprietors Association  
Independent Bankers Association of Texas  
Independent Community Bankers of America  
Independent Insurance Agents of Virginia  
Infectious Diseases Society of America  
Institute for Hazardous Materials Management  
Institute of Food Technologists  
Institute of Management Accountants, Inc.  
Insurance Agents & Brokers Association  
Interlocking Concrete Pavement Institute  
International Society on Thrombosis and Hemostasis  
International Association of Exhibitions and Events  
International Association of Forensic Nurses  
International Association of Lighting Designers  
International Association of Special Investigation Units (IASIU)  
International Board for Certification of Group Psychotherapists  
International Foodservice Distributors Association  
International Franchise Association  
International Literacy Association

International Public Management Association for Human Resources  
International Sign Association  
Interscholastic Equestrian Association  
Invest In the USA (IIUSA)  
Investments & Wealth Institute  
ISACA  
Jimmy John's Franchisee Association (JJFA, Inc.)  
Johnson Lambert LLP  
Kentucky Association of Master Contractors  
King County Bar Association  
LeadingAge Oklahoma  
Life Sciences Trainers & Educators Network  
LLC Consulting  
International Association of Optometric Executives  
Louisiana Affordable Housing Management Assn.  
M Presley Group, LLC  
Magnet Schools of America  
Maryland Chiropractic Association  
Mason Contractors Association of America  
Massachusetts Board of Real Estate Appraisers  
Massachusetts Facilities Administrators Association (MFAA)  
Metals Service Center Institute  
Metropolitan Builders Association  
Michigan Biosciences Industry Association - MichBio  
Michigan Society of Association Executives  
Mid Atlantic Society of Association Executives

Mid-Atlantic Affordable Housing Management Association

Middle Tennessee Association of REALTORS

Midwest Political Science Association

Minneapolis Area Association of REALTORS®

Minnesota Builders Exchange

Minnesota Chiropractic Association

Minnesota Golf Course Superintendents Association

Minnesota Nursery & Landscape Association

Missouri Bankers Association

Mortar Board National Foundation Fund

Mortar Board, Inc.

NAIFA Mt. Diablo

NAIFA SF Peninsula

NAMA (National Automatic Merchandising Association)

NAMSS

NASPA - Student Affairs Administrators in Higher Education

National Active and Retired Federal Employees Association (NARFE)

National Affordable Housing Management Association

National Air Transportation Association

National Apartment Association

National Association of Chain Drug Stores

National Association of Chemical Distributors

National Association of Clean Water Agencies

National Association of Concessionaires

National Association of Directors of Nursing Administration/Long Term Care, Inc.

National Association of Elementary School Principals

National Association of Insurance and Financial Advisors (NAIFA)

National Association of Professional Employer Organizations

National Association of REALTORS®

National Association of Veterans' Research and Education Foundations (NAVREF)

National Auctioneers Association

National Automatic Merchandising Association (NAMA)

National Board for Certified Counselors

National Coffee Association USA

National Concrete Masonry Association

National Confectioners Association

National Council of Teachers of English (NCTE)

National Council on Family Relations

National Golf Course Owners Association

National Grange

National Grocers Association

National Ground Water Association

National Investor Relations Institute

National Lumber and Building Material Dealers Association

National Multifamily Housing Council

National Pawnbrokers Association

National PTA

National Rural Electric Cooperative Association

National School Foundation Association

National School Transportation Association

National Shooting Sports Foundation

National Society for Histotechnology  
National Society of Professional Engineers  
National Stone, Sand & Gravel Association  
National Terrazzo & Mosaic Association  
National Waste & Recycling Association  
Naylor Association Solutions  
Nelson Strategic Consulting  
Nevada Chapter AGC  
New Hampshire Grocers Association  
New Jersey Academy of Family Physicians  
New Jersey Society of Optometric Physicians  
New Mexico Chiropractic Association  
New York Chiropractic Council  
North American Vascular Biology Organization  
North Carolina Association of Pharmacists  
North Carolina Center for Nonprofits  
North Carolina Veterinary Medical Association  
NTCA-The Rural Broadband Association  
NYS Association of School Business Officials  
Ohio Osteopathic Association  
Ohio Society of CPAs  
PAHMA  
Painting and Decorating Contractors of America (PDCA)  
PASAE - Pennsylvania Society for Association Excellence  
PATH Intl.  
Pennsylvania Child Care Association  
Pennsylvania Chiropractic Association  
Pennsylvania Funeral Directors Association  
Pet Industry Distributors Association

Population Association of America  
Raybourn Group International  
Regulatory Affairs Professionals Society  
Results Technology  
Risk and Insurance Management Society  
Rochester Home Builders' Association  
Rocky Mtn - Affordable Housing Management Association  
Rogue Valley Association of REALTORS  
Salon & Spa Professional Association Inc  
School Nutrition Association  
Scott Oser Associates, Inc.  
Secondary Materials and Recycled Textiles Assoc.  
Security Industry Association  
Senior Executives Association (SEA)  
SmithBucklin  
Society for Marketing Professional Services  
Society for the Advancement of Material and Process Engineers  
Society for Vascular Surgery  
Society of Actuaries  
Society of American Florists  
Society of Interventional Radiology  
Society of Petroleum Engineers  
Society of Teachers of Family Medicine  
South Bay Association of REALTORS\*  
Southeastern Affordable Housing Management Association (SAHMA)  
Southwest Cable Communications Association  
Special Libraries Association

Spencer Educational Foundation, Inc.  
Sports & Fitness Industry Association  
Stucco Manufacturers Association  
SYTA  
Tag and Label Manufacturers Institute, Inc.  
Texas Alliance of Energy Producers  
Texas and Southwestern Cattle Raisers Association  
Texas Food and Fuel Association  
Texas Society of Association Executives  
Textile Care Allied Trades Association  
The Builders' Exchange Association of Virginia  
The Electrical Board of MO and IL  
The Fertilizer Institute  
The Honor Society of Phi Kappa Phi  
The Institute of Internal Auditors  
The International Association of Venue Managers (IAVM)  
The Ohio Society of Association Executives  
The Printing Industry of the Carolinas, Inc.  
Tilt-Up Concrete Association (TCA)  
Tire Retread Information Bureau  
Turfgrass Producers International  
TVD Associates, Inc.  
United Fresh Produce Association  
United Motorcoach Association  
United States Catholic Mission Association  
UPCEA  
Utah Medical Association  
Van Petten Group, Inc.  
Vermont Insurance Agents Association

Virginia Association of Secondary School Principals  
Virginia Foundation for Educational Leadership  
Virginia Independent Automobile Dealers Association, Inc.  
Virginia Sheriffs' Association, Inc.  
Virginia Society of Association Executives (VSAE)  
Virginia Society of Certified Public Accountants  
Virginia Veterinary Medical Association  
Visit Duluth  
Washington State Veterinary Medical Association  
Water Environment Federation  
West Maricopa County Regional Association of REALTORS, Inc.  
Wisconsin Association of Mutual Insurance Companies  
Wood Machinery Manufacturers of America  
  
CC:  
Members of the Senate  
Members of the House of Representatives