

STATEMENT IN LIEU OF A REGULATORY

FLEXIBILITY ANALYSIS FOR SMALL BUSINESSES AND LOCAL GOVERNMENTS

DEPARTMENT OF TAXATION AND FINANCE

A Regulatory Flexibility Analysis for Small Businesses and Local Governments is not being submitted with this rule because it will not impose any adverse economic impact or reporting, recordkeeping, or other compliance requirements on small businesses or local governments. The rule does not distinguish between different types and sizes of regulated parties. The rule does not distinguish between regulated parties located in different geographical areas. The purpose of these amendments is to provide a credit proration rule where a qualified security officer is not employed for a full year.

The following organizations were notified that the Department was in the process of developing this rule and were given an opportunity to participate in its development: the Small Business Council of the New York State Business Council, the Division for Small Business of Empire State Development, the National Federation of Independent Businesses, the Retail Council of New York State, the New York State Association of Counties, the Association of Towns of New York State, the New York Conference of Mayors, and the Office of Local Government and Community Services of the New York State Department of State. In addition, drafts of this rule were sent to the following: Service Employees International Union, Business Council of New York State, the New York Bar Association, the Association of the Bar of the City of New York, New York State Society of CPAs, the National Tax Committee for the National Conference of CPA Practitioners and the City of New York Department of Finance. We received no substantive comments from any of these groups.