VIRGINIA BOARD OF ACCOUNTANCY

Monday, March 27, 2023
Board Meeting Agenda
9:30 a.m.

McGrew Tower Conference Center, Hampton University
24 Indian Rd, Hampton, VA 23669

Individuals submitting comments may do so in person, via an authorized representative, or in writing.

9:30 a.m. Call to Order – **Laurie A. Warwick, CPA, Chair**
Security Briefing – **Nicole Reynolds, Licensing and Operations Support**
Approval of March 27, 2023, Agenda
Approval of January 9, 2023, Board meeting minutes

9:35 a.m. Public comment period – Enforcement*

9:40 a.m. Enforcement Agenda – **Matthew Ross, Enforcement Director**
Cases denoted '†' involved IFF

CPE Board Orders

- 2022-0246 Board Order (Glynn) †
- 2022-0348 Board Order (Glynn) †
- 2022-0626 Board Order (Glynn) †

Non-CPE Consent Orders

- 2022-0562 Consent Order (Cotton)
- 2022-0237 Consent Order (Carson)

Non-CPE Board Orders

- 2021-0089 Board Order (Moyers) †
- 2022-0378 Board Order (Moyers) †
- 2022-0385 Board Order (Moyers) †

10 a.m. Welcome – **Dr. Ziette Hayes, Dean, James T. George School of Business, Hampton University**

10:15 a.m. Board Member/Staff Introductions and VBOA Overview – **Laurie A. Warwick, CPA, Chair**

10:45 a.m. Public comment period*

11 a.m. Building a Career in Accounting – **Wendy P. Lewis, CPA**

11:15 a.m. CPA Evolution: Changes to the CPA exam – **Nadia A. Rogers, CPA, Accounting Professor, Virginia Tech**

11:35 a.m. Proposed 8-point plan and UAA revisions **– Stephanie Saunders, CPA, former Board member and current NASBA Vice Chair**

11:50 a.m. Virginia Society of CPAs – Student resources – **Molly Wash, Academic and Diversity Outreach Director, VSCPA**

DRAFT

VIRGINIA BOARD OF ACCOUNTANCY

12 p.m. Adjourn for lunch

1 p.m. Public comment period – Enforcement*

- 2022-0070 Board Order (reconsideration) (Lewis) †

1:10 p.m. NASBA and AICPA Committee Updates – **Laurie A. Warwick, CPA, Chair**

1:15 p.m. Executive Director's Report – **Nancy Glynn, CPA, Executive Director**

- General updates
- Financial and Board Report update – **Renai Reinholtz, Deputy Director**
- Draft FY22 Draft financial statements- requires approval **- Renai Reinholtz, Deputy Director**
- Enforcement update – **Matthew Ross, Enforcement Director**

1:45 p.m. Board Discussion Topics – **Laurie A. Warwick, CPA, Chair**

- UAA Exposure Draft – 24-month credit - **Nancy Glynn, CPA, Executive Director**
- S.M.A.R.T. Goals 2023 update – **Nancy Glynn, CPA, Executive Director**
  - Education for Exam: **Draft Jan. 2023 – Final Mar. 2023 – Communications Apr. 2023**
    - Revised VBOA Education Handbook
    - Potential updates to statutes and Regulation
  - Enforcement: Use of Title – **Draft Oct. 2022 – revised Nov. 2022 – revised Jan. 2023**
    - Draft Guidance Document: Guidelines for Use of the CPA Title
- Board Elections Discussion – **Nancy Glynn, Executive Director**

2:30 p.m. Additional Items for Discussion – **Laurie A. Warwick, CPA, Chair**

- Sign Conflict of Interest forms and travel expense vouchers
- Future meeting dates
  - April 24, 2023
  - June 12, 2023 (planning meeting)
  - August 29, 2023

2:45 p.m. Closed Session

- Legal advice – § 2.2-3711(A)(8)
- Disciplinary proceedings – § 2.2-3711(A)(27)
- Contract discussion – § 2.2-3711(6)

3:30 p.m. Adjournment

***Five-minute public comment, per person, on those items not included on the agenda.**

Persons desiring to attend the meeting and requiring special accommodations/interpretive services should contact the VBOA office at (804) 367-8505 at least five days prior to the meeting so that suitable arrangements can be made for an appropriate accommodation. The VBOA fully complies with the Americans with Disabilities Act.

DRAFT

VIRGINIA BOARD OF ACCOUNTANCY

Board Meeting
January 9, 2023
Draft/Unapproved minutes

The Virginia Board of Accountancy met on Monday, January 9, 2023, in Board Room #4 of the Perimeter Center, 9960 Mayland Drive, Henrico, VA 23233.

MEMBERS PRESENT: Laurie A. Warwick, CPA, Chair
Wendy P. Lewis, CPA, Vice Chair
William R. Brown, CPA
Dale G. Mullen
David Cotton, CPA, CFE, CGFM
Nadia A. Rogers, CPA
D. Brian Carson, CPA, CGMA

LEGAL COUNSEL: James Flaherty, Assistant Attorney General, Office of the Attorney General

STAFF PRESENT: Nancy Glynn, CPA, Executive Director
Renai Reinholtz, Deputy Director
Matthew Ross, Enforcement Director
Kelli Anderson, Communications Manager
Nicole Reynolds, Licensing and Operations Support
Vasa Clarke, Information and Policy Advisor

MEMBERS OF THE PUBLIC PRESENT: Emily Walker, CAE, Vice President, Advocacy, Virginia Society of Certified Public Accountants

CALL TO ORDER

Ms. Warwick called the meeting to order at 9 a.m.

SECURITY BRIEFING

Ms. Reynolds provided the emergency evacuation procedures.

APPROVAL OF AGENDA

Upon a motion by Mr. Cotton and duly seconded, the members voted unanimously to approve the January 9, 2023, agenda. The members voting “AYE” were Ms. Warwick, Mr. Brown, Ms. Lewis, Ms. Rogers, Mr. Mullen, Mr. Cotton and Mr. Carson.

VIRGINIA BOARD OF ACCOUNTANCY

Board Meeting
January 9, 2023
Draft/Unapproved minutes

APPROVAL OF MINUTES

Upon a motion by Mr. Cotton and duly seconded, the members voted unanimously to approve the amended November 29, 2022, Board meeting minutes, as presented. The members voting "AYE" were Ms. Warwick, Mr. Brown, Ms. Lewis, Ms. Rogers, Mr. Mullen, Mr. Cotton and Mr. Carson.

PUBLIC COMMENT PERIOD

There were no public comments. Mr. Ross indicated to the Board that there were written statements for the Board included in the Board packets.

Enforcement Agenda – Matthew Ross, Enforcement Director

The following actions were taken during open session:

Case #2022-0373

Upon a motion by Mr. Carson and duly seconded, the members voted to accept the Consent Order as written.

CALL FOR VOTE:

Laurie A. Warwick, CPA – Aye
Wendy P. Lewis, CPA – Aye
Dale G. Mullen – Aye
William R. Brown, CPA – Aye
Nadia A. Rogers, CPA – Abstain
David Cotton, CPA, CFE, CGFM – Abstain
D. Brian Carson, CPA, CGMA – Aye

VOTE:
Ayes: Five (5)
Abstain: Two (2)
Nays: None (0)

Case #2021-0026

Upon a motion by Ms. Lewis and duly seconded, the members voted to accept the Consent Order as written.

VIRGINIA BOARD OF ACCOUNTANCY

Board Meeting
January 9, 2023
Draft/Unapproved minutes

CALL FOR VOTE:

Laurie A. Warwick, CPA – Aye
Wendy P. Lewis, CPA – Aye
Dale G. Mullen – Aye
William R. Brown, CPA – Abstain
Nadia A. Rogers, CPA – Aye
David Cotton, CPA, CFE, CGFM – Aye
D. Brian Carson, CPA, CGMA – Aye

VOTE:
Ayes: Six (6)
Abstain: One (1)
Nays: None (0)

Case #2022-0368

The Board members reviewed the enforcement record, which included the Informal Fact Finding Summary and Presiding Officer Recommendation, transcript and exhibits.

Upon a motion by Mr. Mullen and duly seconded, the members voted to adopt the Informal Fact Finding Summary and Presiding Officer Recommendation, as written, finding the Respondent had violated Code of Virginia §54.1-4409.1A, 54.1-4414 (2)(4) and 54.1-111(A) (2)(3) and imposing a monetary penalty of $750.

CALL FOR VOTE:

Laurie A. Warwick, CPA – Aye
Wendy P. Lewis, CPA – Aye
Dale G. Mullen – Aye
William R. Brown, CPA – Abstain
Nadia A. Rogers, CPA – Aye
David Cotton, CPA, CFE, CGFM – Aye
D. Brian Carson, CPA, CGMA – Aye

VOTE:
Ayes: Six (6)
Abstain: One (1)
Nays: None (0)

VIRGINIA BOARD OF ACCOUNTANCY

Board Meeting
January 9, 2023
Draft/Unapproved minutes

Case #2022-0070 and Case #2022-0071

Upon a motion by Ms. Rogers and duly seconded, the members voted to move the Board Order to closed session.

CALL FOR VOTE:

Laurie A. Warwick, CPA – Aye
Wendy P. Lewis, CPA – Aye
Dale G. Mullen – Aye
William R. Brown, CPA – Aye
Nadia A. Rogers, CPA – Aye
David Cotton, CPA, CFE, CGFM – Aye
D. Brian Carson, CPA, CGMA – Aye

VOTE:
Ayes: Seven (7)
Abstain: None (0)
Nays: None (0)

Case #2022-0357

The Board members reviewed the enforcement record, which included the Informal Fact Finding Summary and Presiding Officer Recommendation, transcript and exhibits. The Presiding officer of the Informal Fact Finding Conference was not present.

Upon a motion by Mr. Carson and duly seconded, the members voted to adopt the Informal Fact Finding Summary and Presiding Officer Recommendation, as written, finding the Respondent had violated Code of Virginia §54.1-4413.3 (1-4)(7) and Board regulations 18VAC5-22-90 and 18VAC5-22-170(B)(3)(4). The Board imposed sanctions of revocation of license, and a monetary penalty of $100,000 for the Respondent's violations of Code of Virginia §54.1-4413.3 (1-4)(7); $1,125 for the Respondent's violation of 18VAC5-22-90 and $300 for the Respondent's violation of 18VAC5-22-170(B)(3)(4).

CALL FOR VOTE:

Laurie A. Warwick, CPA – Aye
Wendy P. Lewis, CPA – Abstain
Dale G. Mullen – Aye

VIRGINIA BOARD OF ACCOUNTANCY

Board Meeting
January 9, 2023
Draft/Unapproved minutes

William R. Brown, CPA – Abstain
Nadia A. Rogers, CPA – Aye
David Cotton, CPA, CFE, CGFM – Aye
D. Brian Carson, CPA, CGMA – Aye

VOTE:
Ayes: Five (5)
Abstain: Two (2)
Nays: None (0)

Case #2022-0376

The Board members reviewed the enforcement record, which included the Informal Fact Finding Summary and Presiding Officer Recommendation, transcript and exhibits. The Presiding Officer of the Informal Fact Finding Conference was not present.

Upon a motion by Ms. Rogers and duly seconded, the members voted to adopt the Informal Fact Finding Summary and Presiding Officer Recommendation, and accept the Board Order as written, finding the Respondent had violated Code of Virginia §54.1-4409.1A, 54.1-4414 (2)(4) and 54.1-111(A)(2) and imposed a monetary penalty of $1,000 and a reprimand.

CALL FOR VOTE:

Laurie A. Warwick, CPA – Abstain
Wendy P. Lewis, CPA – Aye
Dale G. Mullen – Abstain
William R. Brown, CPA – Aye
Nadia A. Rogers, CPA – Aye
David Cotton, CPA, CFE, CGFM – Abstain
D. Brian Carson, CPA, CGMA – Aye

VOTE:
Ayes: Four (4)
Abstain: Three (3)
Nays: None (0)

VIRGINIA BOARD OF ACCOUNTANCY

Board Meeting
January 9, 2023
Draft/Unapproved minutes

Case #2022-0128

The Board members reviewed the enforcement record, which included the Informal Fact Finding Summary and Presiding Officer Recommendation, transcript and exhibits. The Presiding Officer of the Informal Fact Finding Conference was not present.

Upon a motion by Ms. Rogers and duly seconded, the members voted to adopt the Informal Fact Finding Summary and Presiding Officer Recommendation and the Board Order, as written, finding the Respondent had violated Code of Virginia §54.1-4409.1 (A), 54.1-4414 (2)(3)(4) and 54.1-111(A) (3) and imposed a monetary penalty of $500 and a reprimand.

CALL FOR VOTE:

Laurie A. Warwick, CPA – Aye
Wendy P. Lewis, CPA – Aye
Dale G. Mullen – Aye
William R. Brown, CPA – Aye
Nadia A. Rogers, CPA – Aye
David Cotton, CPA, CFE, CGFM – Aye
D. Brian Carson, CPA, CGMA – Aye

VOTE:
Ayes: Seven (7)
Abstain: None (0)
Nays: None (0)

Case #2022-0195

The Board members reviewed the enforcement record, which included the Informal Fact Finding Summary and Presiding Officer Recommendation and exhibits. The Presiding Officer of the Informal Fact Finding Conference was not present.

Upon a motion by Mr. Carson and duly seconded, the members voted to adopt the Informal Fact Finding Summary and Presiding Officer Recommendation, and accept the Board Order as written, finding the Respondent had violated 18VAC5-22-90 and imposed sanctions of $500 for failing to complete 120 hours of CPE during the reporting period; $250 for failing to complete the Virginia Specific Ethics course in 2020 and the Respondent shall be subject to a CPE compliance review for the 3-year period following any reinstatement of his CPA license.

VIRGINIA BOARD OF ACCOUNTANCY

Board Meeting
January 9, 2023
Draft/Unapproved minutes

CALL FOR VOTE:

Laurie A. Warwick, CPA – Aye
Wendy P. Lewis, CPA – Aye
Dale G. Mullen – Aye
William R. Brown, CPA – Aye
Nadia A. Rogers, CPA – Aye
David Cotton, CPA, CFE, CGFM – Nay
D. Brian Carson, CPA, CGMA – Aye

VOTE:
Ayes: Six (6)
Abstain: None (0)
Nays: One (1)

Case #2022-0251

The Board members reviewed the enforcement record, which included the Informal Fact Finding Summary and Presiding Officer Recommendation and exhibits. The Presiding Officer of the Informal Fact Finding Conference was not present.

Upon a motion by Ms. Lewis and duly seconded, the members voted to adopt the Informal Fact Finding Summary and Presiding Officer Recommendation, and accept the Board Order as written, finding the Respondent had violated 18VAC5-22-90 and imposed sanctions of $250 for being deficient 20 hours of CPE in 2020; a reprimand for failing to complete the Virginia Specific Ethics course in 2020; and be subject to a CPE compliance review for the 2023, 2024 and 2025 three year reporting period to and provide proof of completion for the 20 hours of deficient CPE for 2020.

CALL FOR VOTE:

Laurie A. Warwick, CPA – Aye
Wendy P. Lewis, CPA – Aye
Dale G. Mullen – Aye
William R. Brown, CPA – Aye
Nadia A. Rogers, CPA – Aye
David Cotton, CPA, CFE, CGFM – Aye
D. Brian Carson, CPA, CGMA – Aye

VIRGINIA BOARD OF ACCOUNTANCY

Board Meeting
January 9, 2023
Draft/Unapproved minutes

VOTE:
Ayes: Seven (7)
Abstain: None (0)
Nays: None (0)

Case #2022-0319

The Board members reviewed the enforcement record, which included the Informal Fact Finding Summary and Presiding Officer Recommendation and exhibits. The Presiding Officer of the Informal Fact Finding Conference was not present.

Upon a motion by Mr. Carson and duly seconded, the members voted to adopt the Informal Fact Finding Summary and Presiding Officer Recommendation, and accept the Board Order as written, finding the Respondent had violated 18VAC5-22-90, imposing sanctions of $750 and for failing to complete 120 hours of CPE from 2018-20; a reprimand for failing to complete the Virginia Specific Ethics course; and failing to maintain the minimum of 20 hours of CPE in each year of the audit period; be subject to a CPE compliance review for the 2023, 2024 and 2025 reporting period and provide proof of completion for the 120 hours of deficient CPE from the reporting period.

CALL FOR VOTE:

Laurie A. Warwick, CPA – Aye
Wendy P. Lewis, CPA – Aye
Dale G. Mullen – Aye
William R. Brown, CPA – Aye
Nadia A. Rogers, CPA – Aye
David Cotton, CPA, CFE, CGFM – Aye
D. Brian Carson, CPA, CGMA – Aye

VOTE:
Ayes: Seven (7)
Abstain: None (0)
Nays: None (0)

VIRGINIA BOARD OF ACCOUNTANCY

Board Meeting
January 9, 2023
Draft/Unapproved minutes

Case #2022-0194

The Board members reviewed the enforcement record, which included the Informal Fact Finding Summary and Presiding Officer Recommendation and exhibits. The Presiding Officer of the Informal Fact Finding Conference was not present.

Upon a motion by Mr. Cotton and duly seconded, the members voted to adopt the Informal Fact Finding Summary and Presiding Officer Recommendation, with a modification to the sanctions. The modification was to eliminate the sanction that the Respondent submit proof of completion for 120 hours of deficient CPE within 90 days of the Board's Final Order. The Board accepted the recommendation with Mr. Cotton's modification and found the Respondent had violated 18VAC5-22-90 and imposed sanctions of $750 and for failing to complete 120 hours of CPE from 2018-20; a reprimand for failing to complete the Virginia Specific Ethics course; and failing to maintain the minimum of 20 hours of CPE in each year of the audit period, and for the Respondent to be subject to a CPE audit for the 3-year period following any reinstatement of license.

CALL FOR VOTE:

Laurie A. Warwick, CPA – Aye
Wendy P. Lewis, CPA – Aye
Dale G. Mullen – Aye
William R. Brown, CPA – Aye
Nadia A. Rogers, CPA – Aye
David Cotton, CPA, CFE, CGFM – Aye
D. Brian Carson, CPA, CGMA – Aye

VOTE:
Ayes: Seven (7)
Abstain: None (0)
Nays: None (0)

The Board entered **closed session** under authority of § 2.2-3711(A) (8) and § 2.2-3711(A) (27), consultation with legal counsel regarding specific legal matters and disciplinary matters.

Begin closed meeting

Upon a motion by Ms. Lewis, and duly seconded, the members approved by unanimous vote the meeting be recessed and the Virginia Board of Accountancy convene a closed meeting under the Virginia

VIRGINIA BOARD OF ACCOUNTANCY

Board Meeting
January 9, 2023
Draft/Unapproved minutes

Freedom of Information Act to a matter lawfully exempted from open meeting requirements under the 'Legal advice regarding specific legal matters' exemption contained in Virginia Code §2.2-3711 (A)(8) and disciplinary matters exemption contained in Virginia Code § 2.2-3711(A) (27).

The following non-members will be in attendance for a portion of the closed meeting to reasonably aid in the consideration of this topic: Nancy Glynn, Matthew Ross and James Flaherty.

The members voting "AYE" were Ms. Warwick, Mr. Brown, Ms. Lewis, Ms. Rogers, Mr. Mullen, Mr. Carson and Mr. Cotton.

End closed meeting

Upon a motion by Ms. Lewis, and duly seconded, the Virginia Board of Accountancy convened a closed meeting on this date pursuant to an affirmative recorded vote and in accordance with the provisions of the Virginia Freedom of Information Act; and WHEREAS, § 2.2-3712 (D) of the Code of Virginia requires a certification by this Board that such closed meeting was conducted in conformity with Virginia law; NOW THEREFORE, BE IT RESOLVED, that the VBOA hereby certifies that, to the best of each member's knowledge, (i) only public business matters lawfully exempted from open meeting requirements by Virginia laws were discussed in the closed meeting to which this certification resolution applies, and (ii) only such public business matters as were identified in the motion convening the closed meeting were heard, discussed or considered by the VBOA.

The members voting "AYE" were Ms. Warwick, Mr. Brown, Ms. Lewis, Ms. Rogers, Mr. Mullen, Mr. Carson and Mr. Cotton.

Case #2022-0070

The Board members reviewed the enforcement record, which included the Informal Fact Finding Summary and Presiding Officer Recommendation, transcript, and exhibits.

Upon a motion by Mr. Cotton and duly seconded, the members voted to adopt the Informal Fact Finding Summary and Presiding Officer Recommendation, with a modification to the proposed sanctions. Specifically, Mr. Cotton's motion modified the monetary penalty for the violations of Code of Virginia §54.1-4413.3 (1-4), and (7) from $5,000 to $100,000. The sanctions otherwise remained the same. The Board accepted Mr. Cotton's motion and found the Respondent had violated Code of Virginia §54.1-4413.3 (1-4)(7), Board Regulations 18VAC5-22-90 and 18VAC5-22-170 (B)(3)(4) and imposed sanctions of revocation of Respondent's license, a monetary penalty of $100,000 of the violations of Code of Virginia §54.1-4413.3 (1-4)(7), $250 for his violation of 18VAC5-22-90, and $300 for his violations of 18VAC5-22-170(B)(3)(4).

VIRGINIA BOARD OF ACCOUNTANCY

Board Meeting
January 9, 2023
Draft/Unapproved minutes

CALL FOR VOTE:

Laurie A. Warwick, CPA – Aye
Wendy P. Lewis, CPA – Abstain
Dale G. Mullen – Aye
William R. Brown, CPA – Aye
Nadia A. Rogers, CPA –Aye
David Cotton, CPA, CFE, CGFM – Aye
D. Brian Carson, CPA, CGMA – Nay

VOTE:
Ayes: Five (5)
Abstain: One (1)
Nays: One (1)

Case #2022-0071

The Board members reviewed the enforcement record, which included the Informal Fact Finding Summary and Presiding Officer Recommendation, transcript and exhibits.

Upon a motion by Mr. Carson and duly seconded, the members voted to adopt the Informal Fact Finding Summary and Presiding Officer Recommendation, with a modification to the proposed sanctions. Specifically, Mr. Carson's motion modified the monetary penalty for the violations of Code of Virginia §54.1-4413.3 (1-4)(7) from $50,000 to $100,000. The sanctions otherwise remained the same. The Board accepted Mr. Carson's motion and found the Respondent had violated Code of Virginia §54.1-4413.3 (1-4)(7) and imposed sanctions of revocation of Respondent's license, and a monetary penalty of $100,000 of the violations of Code of Virginia §54.1-4413.3 (1-4)(7).

CALL FOR VOTE:

Laurie A. Warwick, CPA – Aye
Wendy P. Lewis, CPA – Abstain
Dale G. Mullen – Aye
William R. Brown, CPA – Aye
Nadia A. Rogers, CPA – Aye
David Cotton, CPA, CFE, CGFM – Aye
D. Brian Carson, CPA, CGMA – Aye

VIRGINIA BOARD OF ACCOUNTANCY

Board Meeting
January 9, 2023
Draft/Unapproved minutes

VOTE:
Ayes: Six (6)
Abstain: One (1)
Nays: None (0)

PUBLIC COMMENT PERIOD

Emily Walker advised the Board that a new legislative session begins and that the VSCPA would monitor and communicate matters of interest to the Board. She informed the Board of two initiatives by the VSCPA regarding rolling tax conformity and pass-through entity tax.

Ms. Walker noted the VSCPA has concerns with the proposed changes to the Use of Title Guidelines and would share those concerns at the appropriate time later in the meeting.

NASBA and AICPA COMMITTEE UPDATES

NASBA Administrative and Finance Committee

Ms. Warwick advised that the committee would be meeting the week of January 16, 2023.

NASBA Education Committee

Ms. Rogers noted that the VSCPA 150-hour Task Force met on Dec. 12, 2022, to continue its discussion of the 150-hour requirement for licensure with the eventual goal of making a recommendation to the VSCPA Board of Directors.

Ms. Rogers indicated that the NASBA Accounting Pipeline Task Force held its first meeting on January 4, 2023, where the mission of the task force was discussed along with relevant documents and previous actions taken within the profession to date.

Ms. Rogers advised that the AICPA Board of Examiners met on December 1, 2022, at which time the final blueprint for the CPA exam launching in January 2024 was approved. The final blueprint was made available to the public on January 4, 2023.

VIRGINIA BOARD OF ACCOUNTANCY

Board Meeting
January 9, 2023
Draft/Unapproved minutes

NASBA CPE Committee

Mr. Brown apprised the Board of a work-study group currently reviewing CPE standards that will submit suggestions to NASBA and AICPA CPE Committees. Comments are due by March 31, 2023. Mr. Cotton and Mr. Brown discussed the potential effect of the exposure draft on Virginia CPAs and a discussion ensued. Ms. Glynn will report on the current participation of other Boards. Comments by VBOA should be submitted in advance of the March 27, 2023, Board meeting.

EXECUTIVE DIRECTOR'S REPORT

General updates

- Ms. Glynn informed the Board that the IT Specialist position had not yet been filled and would be re-posted and fielded questions from the Board. She advised the VBOA will be posting positions for both a full time and part time Enforcement Investigator.
- Ms. Glynn fielded questions from the Board regarding the implementation of a new VBOA licensing system.
- Ms. Glynn discussed the upcoming license renewal season and fielded questions by the Board regarding inquiries surrounding year-end CPE requirements.
- Ms. Glynn announced that the 2023 VBOA-approved ethics courses will start being available on February 1, 2023.

Financial and Board Report update

Ms. Reinholtz presented and fielded questions regarding the December Financial and Board Reports.

Enforcement update

Mr. Ross provided handouts and reported on the progress of the Enforcement Division. He fielded questions from the Board. Ms. Glynn addressed the Board on the matter of CPE audits to be performed in 2023.

Policy update

Mr. Clarke advised the Board that the public comment period for the Education Accreditation guidance document and revised Policy #9 were completed with no comments received. The Education Accreditation guidance document has been finalized and placed on Town Hall. The Use of Title is still in progress.

A reminder was provided to Board members that financial disclosures are due by February 1.

VIRGINIA BOARD OF ACCOUNTANCY

Board Meeting
January 9, 2023
Draft/Unapproved minutes

Board Discussion Topics - Laurie A. Warwick, CPA, Chair

Draft Revised Policy #9 Inactive Status Procedure for Approval/Denial/Appeal

Ms. Lewis led a discussion regarding the Board's intentions for the policy update. Discussion ensued. The Board agreed upon an additional update to be added by Ms. Glynn.

Upon a motion by Mr. Cotton and duly seconded, the members voted to approve the document with one modification.

CALL FOR VOTE:

Laurie A. Warwick, CPA – Aye
Wendy P. Lewis, CPA – Aye
Dale G. Mullen – Aye
William R. Brown, CPA – Aye
Nadia A. Rogers, CPA – Aye
David Cotton, CPA, CFE, CGFM – Aye
D. Brian Carson, CPA, CGMA – Aye

VOTE:
Ayes: Seven (7)
Abstain: None (0)
Nays: None (0)

Adjourn for Lunch

S.M.A.R.T. Goals update - Nancy Glynn, CPA

Education Accreditation

Education Accreditation is complete.

Enforcement Peer Review: January 2023

Ms. Glynn advised that there are current VBOA guidelines related to Peer Review and that VSCPA

comments had been received. She stated further that VBOA would begin monitoring peer review manually until a new database system was completed and take appropriate actions with firms that are out of compliance.

Education for Exam: Draft due January 2023 – Final February 2023-Communications April 2023

Ms. Rogers led the discussion of the proposed changes to the VBOA education requirements to sit for the CPA exam, noting that the requirements remain in compliance with the UAA Model Rule and, as a result, Virginia would remain substantially equivalent. Board discussion ensued that resulted in changes to the draft to be made by Ms. Glynn and addressed at the March Board meeting.

Education for Licensure: January 2023

Ms. Rogers led the discussion regarding the objectives of the Education for Licensure and suggested that the deliverable date of this SMART Goal be changed from January 2023 to a later date given the current discussions within the profession related to the 150-hour requirement. Changes to the 150-hour requirement for licensure in Virginia are not anticipated at this time as the importance of substantial equivalency and practice mobility are recognized by the Board.

Licensing System: Proposal update January 2023

Ms. Glynn informed the Board that a project manager has been engaged. She outlined the steps and approvals necessary before VBOA may sign a contract. She fielded questions by the Board regarding the SOW, IT security and the timeline of the project.

Enforcement: **Use of Title - Enforcement: Use of Title: Final January 2023**

Draft Guidance Document: Guidelines for Use of the CPA Title

Ms. Glynn led the review of changes to the guidelines. A lengthy discussion ensued. Board members suggested changes to the document. Ms. Walker participated in the discussion.

A detailed discussion took place and changes to the document were presented by various Board members. Ms. Glynn recorded the changes. The document will be reviewed by Mr. Flaherty and Mr. Mullen by February 15, 2023, before it is released for public comment.

Enforcement: **CPE Review- Draft January 2023 – Final March 2023**

Ms. Glynn led the discussion and fielded questions by the Board.

VIRGINIA BOARD OF ACCOUNTANCY

Board Meeting
January 9, 2023
Draft/Unapproved minutes

Upcoming Board Elections

Ms. Glynn advised the Board that a vote will be taken at the March 27, 2023, Board meeting. Ms. Glynn asked that nominations be submitted before the March Board meeting.

The Board discussed the logistics of the March 27 Board meeting at Hampton University.

Additional Items for Discussion

- Sign Conflict of Interest forms
- Sign Travel Expense vouchers
- Future meeting dates – Current and future meeting dates were discussed and are subject to change.
  - March 27, 2023- Hampton University
  - Board discussed the annual planning meeting on April 24, 2023
  - June 12, 2023
  - August 29, 2023

ADJOURNMENT

There being no further business before the VBOA, Ms. Lewis adjourned the meeting at 2 p.m.

APPROVED:

_____
Laurie A. Warwick, CPA, Chair

COPY TESTE:

_____
Nancy Glynn, CPA, Executive Director

DRAFT 8-POINT PLAN TO ADDRESS THE CPA PIPELINE
EXECUTIVE SUMMARY

Introduction

An intentional and consistent effort is required to encourage many talented people to become CPAs. Ensuring that the pipeline of students is robust enough to meet market needs requires a collective effort to address systemic hurdles to entry, including attractiveness, cost, time, and reward.

What follows is a draft package of initiatives designed to better position students and the system for success. This draft plan will continue to grow and evolve through this phase of discussion and will become even more impactful through input from key stakeholders.

Initiatives outlined in brief here will align with the ongoing profession-wide, multi-stakeholder efforts to attract students to the accounting profession, educate and prepare them for licensure, and ready them for careers in accounting.

DRAFT

1. Integrated Education and Experience Program

- The Integrated Education and Experience Program (IEEP) is an AICPA and NASBA sponsored program that would provide university students on a CPA career pathway an opportunity to work at a firm and gain a mix of work experience, study time, and affordable college credit hours after a bachelor's degree is earned and before 150 credit hours of education has been achieved.
- The program is designed to be one of many ways to bridge the gap between education and practice. (Other ways include traditional internships, advance placement high school credits, dual credit high/school college programs, CLEP, community college courses)
- IEEP is a cost-effective, flexible, and scalable alternative route for the student/employee to earn up to 30 hours of academic credit.
- The program is being developed by AICPA and NASBA with input from firms, students, young professionals, academics, state CPA societies, and state boards of accountancy.
- IEEP will increase accessibility to and affordability of entry into the profession for a diverse pool of candidates. The program will benefit both candidates and firms by recruiting more students into the pipeline and helping them reach their CPA licenses.
- Success will mean a pilot program by the Fall 2023.

2. 30-hour Communication Campaign

- While prescriptive guidance on the additional educational hours required for licensure would diminish flexibility students often need, powerful examples of how to achieve 150 hours could eliminate uncertainties among students and further align candidate coursework with firm and employer needs in their new hires.
- This effort will focus on showcasing students using their 30 hours in creative ways that help with career readiness.
- Content for students and their influencers will include presentations, talking points, and other deliverables, informed by survey data from firms on desired skills.
- Success will mean content released at the start of Q2 2023.

3. Extending the 18-month Exam Window for Candidates

- Given the increased work demands on CPA candidates by firms amid other social and external pressures on the candidates, the 18-month window for a CPA candidate to pass all 4 sections of the CPA Exam is viewed as being too restrictive. Greater flexibility is needed to provide additional time for candidates to complete the Exam process.
- We will increase our efforts to work with NASBA and state boards to extend the 18-month window for candidates.
- Work has been done already as part of the launch of the CPA Evolution CPA Exam. CPA Evolution provides an opportunity to pilot this program on January 1, 2024, and NASBA and the state boards are already studying the impact on expanding the testing window post launch of CPA Evolution.
- Adjusting the 18-month period should focus on "high-potential" candidates that have completed over half of the CPA journey, ensuring an additional 1,000 – 3,000 or more licensed CPAs annually.
- Success will mean both an increase in the number of newly licensed CPAs annually and potentially an increase in the percentage of candidates staying in the pipeline through CPA licensure.

4. Consider and Address Jurisdictional Barriers to Initial Licensure

- For decades the profession has worked on uniformity across state lines through the mobility and substantial equivalency provisions contained in the Uniform Accountancy Act (UAA).
- To further advance uniformity and eliminate state specific challenges CPA candidates experience when applying for the CPA Exam and initial licensure, we will work with NASBA and state boards to address the challenges to the licensure path in states that confuse and frustrate CPA candidates, leading to eventual departure.
- This effort will examine how we can streamline and align the regulatory and legal environments and their impact on the journey to the CPA license.
- Success will mean significant reduction in state-by-state regulatory and legal barriers to entry, providing a more transparent and efficient route to the CPA across the U.S.

DRAFT

5. High School and College Strategies

- The AICPA will explore, develop, and execute numerous inter-related strategies to strengthen the pipeline at the high school and college levels.
- At the high school level, the work includes promotion of dual-credit curricula and programs and assessing whether and how to develop an Advanced Placement (AP) course that will provide college credit.
- At the college level, efforts include promotion of dual-credit curricula and programs, customized strategies for online universities, and a prioritized focus on minority serving institutions and HBCUs.
- Success will mean an increase in the 66,000 annual bachelor's and master's graduates in accounting and a return (followed by an increase) to 50% of accounting graduates, or 33,000, becoming first-time CPA candidates.

6. STEM Recognition

- Accounting curricula, particularly at the college and university level, have evolved to reflect the profession's role as a technology driver. Recognition of accounting as a STEM field will reflect how accounting has changed in recent years.
- Legislation introduced in 2021 would allow STEM K-12 grant funding to be used for accounting awareness and education, with a focus on increasing access to underrepresented groups. Further, AICPA nominated accounting and five other curricula (Classification of Instructional Program codes) to be designated as STEM by the Department of Homeland Security.
- In addition to seeking this federal legislation and direct designation of accounting as a STEM field, we are working with colleges and universities to expand their accounting curricula to include additional technology-focused courses to meet the profession's current and future needs.
- Success will mean passage of federal STEM legislation in 2023, designation of one or more accounting curricula fields as STEM by DHS, and greater adoption of STEM curricula and existing STEM CIP codes by college and university accounting programs.

7. Endowment / The AICPA Foundation

- The AICPA Foundation is shifting its strategy to a laser focus on accepting donor contributions and funding students and CPA candidates in financial need in their journey to the CPA or CPA-PhD. The renewed strategy of the Foundation has been approved by the Board of Trustees and 2023 is the transition year.
- In addition to providing financial support, we are in a unique position to work with firms to provide students with access to internships, fellowship, mentorship, and financial scholarships.
- Success will mean growth both in assets and in the number and amount of focused scholarships and internship placements.

DRAFT

8. Stakeholder Calls to Action

- The CPA pipeline is being adversely impacted by a variety of factors. While the rigors of entry into a profession necessarily include certain hurdles – education, exam, and experience – the challenges extend into the broader ecosystem around these three areas.
- We will address the system of attractiveness, cost, time, and reward as a barrier to entry into the profession.
- In this spirit, we will assess and call for changes in the broader ecosystem that result in meaningful and comprehensive solutions to the CPA pipeline concerns. This includes CPA firms, universities, and the regulatory community.
- Success will mean developing dialogue on the broader issues impacting the attractiveness of the CPA profession and creating positive and measurable change across these fronts.

DRAFT

Financial Report
FY23 Budget vs. Actual Expenses
As of February 28, 2023

		FY23 Operating Budget	FY23 YTD Expenditures	% Expended	FY22 Expenditures	FY21 Expenditures	FY20 Expenditures
Salaries & Benefits							
1123	Salaries	1,134,760	692,639	61.0%	897,977	844,009	879,646
11XX	Benefits	590,756	259,689	44.0%	354,860	352,058	429,238
	Total Salaries & Benefits	**$ 1,725,516**	**$ 952,328**	**55.2%**	**$ 1,252,837**	**$ 1,196,067**	**$ 1,308,884**
Contractual Services							
1211	Express Services	850	2,307	271.4%	655	33	84
1214	Postal Services	17,000	7,978	46.9%	15,395	14,576	12,011
1215	Printing Services	6,500	2,911	44.8%	5,766	3,208	6,459
1216	Telecommunications - VITA	12,000	7,109	59.2%	11,449	10,921	9,609
1217	Telecommunications - Nonstate (CallFire)	2,500	300	12.0%	1,200	1,530	2,495
1219	Inbound Freight	300	50	16.7%	135	22	260
1221	Organization Memberships (primarily NASBA)	8,835	8,232	93.2%	9,279	7,674	8,327
1222	Publication Subscriptions	4,270	995	23.3%	4,357	3,655	3,655
1224	Training - Courses, Workshops, Conferences	9,490	3,519	37.1%	6,126	763	7,563
1227	Training-Transportation, Lodging, Meals, Incidentals	18,500	4,093	22.1%	4,635	-	9,511
1242	Fiscal Services (Credit Card Merchant Fees)	60,000	18,224	30.4%	45,864	47,123	68,818
1243	Attorney Services	25,000	17,207	68.8%	16,097	26,217	48,624
1244	Mgmt. Services - NASBA/special accommodations	37,422	7,533	20.1%	10,387	9,012	28,061
1245	Personnel Management Services	-	2,530	---	-	-	-
1246	Public Info/Public Relations (subscriptions)	3,500	-	0.0%	2,485	439	4,484
1247	Legal Services (court reporting services)	12,100	2,511	20.8%	8,363	11,460	2,688
1252	Electrical Repair/Maintenance	-	-	---	-	3,681	-
1253	Equipment Repair/Maintenance	-	-	---	-	-	440
1264	Food and Dietary Services	3,500	1,441	41.2%	2,352	1,127	2,377
1266	Manual Labor Services (Includes shredding services)	1,100	60	5.5%	200	1,410	1,757
1268	Skilled Services	2,100	1,125	53.6%	1,650	-	600
1272	VITA - System Hosting, Maintenance, and Admin	248,235	133,665	53.8%	222,006	320,442	135,675
1272	VITA - Shared ISO Audit Services	20,500	-	0.0%	20,425	-	-
1272	VITA - System Implementation	250,000	-	0.0%	-		
1272	VITA - ECOS fees	-	-	---	4,755	-	-
1272	VITA - System Reporting Tool	-	-	---	5,750	-	-
1273	Info Mgmt Design and Development Services (IT Support)	-	13,200	---	19,450	230,725	108,689
1275	Computer Software Maintenance (website hosting)	7,070	5,150	72.8%	7,050	7,235	6,435
1278	VITA Information Technology Infrastructure Services (included ECOS)	77,280	33,796	43.7%	52,008	57,838	148,216
1282	Travel - Personal Vehicle	6,500	3,721	57.2%	4,927	962	6,318
1283	Travel - Public Carriers	1,200	13	1.1%	497	-	-
1285	Travel - Subsistence and Lodging	2,500	1,736	69.4%	1,890	-	1,221
1288	Travel, Meal Reimburse - Not IRS Rpt	2,000	709	35.5%	1,106	-	723
	Total Contractual Services	**$ 840,252**	**$ 280,117**	**33.3%**	**$ 486,259**	**$ 760,054**	**$ 625,343**
Supplies and Materials							
1312	Office Supplies	2,500	287	11.5%	864	904	1,191
1313	Stationery and Forms	1,800	475	26.4%	404	644	997
1323	Gasoline (Enterprise vehicles)	250	-	0.0%	-	-	87
1335	Packaging and Shipping Supplies	1,200	-	0.0%	369	720	351
1342	Medical & Dental Supplies	50	-	0.0%	-	30	-

		FY23 Operating Budget	FY23 YTD Expenditures	% Expended	FY22 Expenditures	FY21 Expenditures	FY20 Expenditures
Supplies and Materials, continued							
1352	Custodian Repair & Maintenance	-	-	---	-	14	728
1362	Food & Dietary Supplies	550	139	25.3%	126	107	442
1363	Food Service Supplies	50	-	0.0%	236	35	16
1373	Computer Operating Supplies	1,500	115	7.7%	786	1,236	823
	Total Supplies & Materials	**$ 7,900**	**$ 1,016**	**12.9%**	**$ 2,785**	**$ 3,689**	**$ 4,634**
Transfer Payments							
1413	Awards & Recognition	350	-	0.0%	623	343	-
1415	Unemployment Compensation	-	-	---	-	216	-
1418	Incentives	350	-	0.0%	-	-	725
	Total Transfer Payments	**$ 700**	**$ -**	**0.0%**	**$ 623**	**$ 559**	**$ 725**
Continuous Charges							
1512	Automobile Liability Insurance	231	-	0.0%	231	231	231
1516	Property Insurance	1,224	-	0.0%	540	1,224	1,224
1534	Equipment Rentals	13,943	5,294	38.0%	7,454	8,099	8,133
1539	Building Rentals - Non-State Owned Facilities	100,625	67,197	66.8%	97,997	95,005	95,161
1541	Agency Service Charges (shared services)	59,722	27,358	45.8%	49,465	52,373	37,675
1551	General Liability Insurance	5,500	-	0.0%	5,328	328	328
1554	Surety Bonds	40	-	0.0%	40	40	40
1555	Worker's Compensation	1,110	-	0.0%	1,110	1,094	1,023
	Total Continuous Charges	**$ 182,395**	**$ 99,849**	**54.7%**	**$ 162,165**	**$ 158,394**	**$ 143,815**
Equipment							
2216	Network Components	2,500	-	0.0%	1,653	877	1,357
2217	Other Computer Equipment	200	102	51.0%	155	130	97
2218	Computer Software Purchases	500	-	0.0%	418	50	428
2231	Electronic Equipment	6,450	-	0.0%	1,170	-	-
2233	Voice and Data Transmission Equipment	-	-	---	-	969	23
2261	Office Appurtenances (Blinds, Carpet, etc.)	-	-	---	-	-	687
2262	Office Furniture	1,500	454	30.3%	755	-	385
2263	Office Incidentals	-	46	---	63	345	658
2283	Mechanical Equipment	-	-	---	-	-	2,338
2328	Construction, Building Improvements	-	-	---	-	150	44,209
	Total Equipment	**$ 11,150**	**$ 602**	**5.4%**	**$ 4,214**	**$ 2,521**	**$ 50,182**
	Total Expenses	**$ 2,767,913**	**$ 1,333,912**	**48.2%**	**$ 1,908,884**	**$ 2,121,284**	**$ 2,133,583**
	Chapter 2 Appropriation	**$ 2,767,913**					

Virginia Board of Accountancy
Cash Balance Report

	Operating Fund		Trust Fund	
	FY2023 As of 2/28/23	FY2022 As of 2/28/22	FY2023 As of 2/28/23	FY2022 As of 2/28/22
Beginning Cash Balance July 1	**$ 2,556,744**	**$ 2,473,711**	**$ 3,341,045**	**$ 3,157,427**
YTD Revenue Collected	319,289	279,854	-	-
Interest earnings*	11,642	3,387	16,095	5,569
Accounts Payable **	38	-	-	-
Cash Transfers In per Board Policy #1	193,303	-	-	177,280
Cash Transfers Out per Board Policy #1		(177,280)	(193,303)	-
YTD Expenditures	(1,333,912)	(1,228,561)	-	-
Cash Balance	**$ 1,747,105**	**$ 1,351,111**	**$ 3,163,836**	**$ 3,340,276**
Required Cash Transfers:				
Transfers to Central Service Agencies ***	$ (11,983)	$ (13,366)	-	-
Cash Balance after required transfers	**$ 1,735,122**	**$ 1,337,745**	**$ 3,163,836**	**$ 3,340,276**

* Interest Earnings - Per Virginia Acts of Assembly - Chapter 732 - §3-3.03 - Approved April 10, 2016, the State Comptroller shall allocate revenue for interest earnings effective FY2016. Interest Earnings had not been allocated since FY2010.

** Prior to October 1, 2014 and the implementation of the Commonwealth's new financial accounting and reporting system (Cardinal) all payments immediately reduced cash when processed (in CARS). The new Cardinal financial system operates on a modified accrual basis and cash balances are not affected until the voucher's due date. The Cardinal system generates an offsetting entry to a liability account (accounts payable) when the voucher is processed. Once the voucher due date arrives, the payment is made, the liability is relived and cash is now reduced.

*** Non-general fund Transfers required by Virginia Acts of Assembly Part 3-1.01F for expenses incurred by central service agencies due on or before June 30.

Virginia Board of Accountancy
MLO Revenue by Fee Type Report

	Fee Type	FY2023 - YTD as of 2/28/23	FY2022 - YTD as of 2/28/23	Fiscal Year Ending 6/30/22	Fiscal Year Ending 6/30/21	Fiscal Year Ending 6/30/20
	Exam Application Fee	$ 79,635	$ 89,550	$ 130,560	$ 149,430	$ 171,105
	Individual License Application Fee	48,075	60,525	70,800	83,100	93,300
	Firm License Application Fee	3,400	3,200	4,100	4,500	7,300
	Re-Exam Application	49,360	55,880	72,080	83,420	80,240
(a)	Renewal Fee	1,405	33,405	1,777,925	1,824,315	1,824,475
	Reinstatement Fee	124,350	48,350	98,600	63,150	63,500
	Duplicate Wall Certificate Fee	1,125	1,025	2,150	1,700	1,800
	License Verification Fee	11,200	10,875	21,325	16,625	16,175
	CPA Exam Score Transfers	850	1,050	1,075	1,325	1,750
	Administrative Fee	-	-	45	646	-
	Bad Check Fee	239	236	50	50	313
	Total Revenue	**$ 319,639**	**$ 304,096**	**$ 2,178,710**	**$ 2,228,261**	**$ 2,259,958**
(b)	**Net Revenue per Cardinal**	**$ 319,289**	**$ 274,716**	**$ 2,178,830**	**$ 2,199,041**	**$ 2,220,553**
(c)	**Difference**	**$ 350**	**$ 29,380**	**$ (120)**	**$ 29,220**	**$ 39,405**

NOTES:

(a) FY19 Renewal Fee includes pro-rated fees related to the transition to the June 30th single renewal date.

(b) Net Revenue per Cardinal reported above includes revenue received from regulatory fees.

(c) Total revenue from MLO will not always match the revenue collected and reported in Cardinal due to timing differences.

Virginia Board of Accountancy
Financial Report
Accounts Receivable Report

	FY2023 - YTD as of 2/28/23	FY2022 - YTD as of 2/28/23	Fiscal Year Ending 6/30/22	Fiscal Year Ending 6/30/21	Fiscal Year Ending 6/30/20
Fines levied	$ 781,780	$ 83,250	$ 189,950	$ 128,042	$ 107,725
Fines collected	$ 198,270	$ 72,552	$ 157,851	$ 138,947	$ 112,760
Fines Discharged	$ 52,542	$ -	$ -	$ -	$ -
Outstanding Current fines receivable (< 365 Days)	$ 655,376	$ 36,101	$ 49,751	$ 29,041	$ 49,975
Outstanding Written-off receivables (=> 365 Days)	$ 606,074	$ 672,981	$ 680,731	$ 669,342	$ 659,313

NOTE:
All accounts uncollected after one year are deemed uncollectible, are written off of the VBOA's financial account records, and are no longer recognized receivables for financial reporting purposes; however, the legal obligation to pay the debt still remains.

Individual and firm license activity
February 28, 2023

Fiscal Period	Period ending 2/28/2023	Period ending 2/28/2022	Period ending 6/30/2022	Period ending 6/30/2021	Year ending 6/30/2020
REGULANTS **Individuals**					
Active, licensed CPAs	27,277	27,483	26,482	26,715	26,666
Inactive, licensed CPAs	2,188	2,125	2,053	2,033	1,915
Total Licensed CPAs	**29,465**	**29,608**	**28,535**	**28,748**	**28,581**
Out-of-state licensees	10,052	9,936	9,669	9,572	8,935
Reinstatements - Individuals	341	218	257	170	170
New CPA licenses issued	657	790	1,039	1,069	1,241
Expired/voluntarily surrendered licenses	29	53	1,337	119	861
Exam Candidates					
Number of first time exam candidates	**689**	**670**	**1,118**	**1,193**	**1,673**
Firms					
Total active, licensed CPA firms	**1,142**	**1,170**	**1,172**	**1,125**	**1,157**
Reinstatements - Firms	10	13	18	8	8
New CPA firm licenses issued	26	32	42	38	37
Expired/voluntarily surrendered licenses	1	3	76	12	81

All Open Enforcement Complaints - *As of December 31, 2022*

All Open Enforcement Complaints

All Open Complaint Types

CPE Deficiency	230
Acts Discreditable	3
Due Professional Care	32
Unlicensed Activity	40
Eligibility	0
	305

All Open Enforcement Complaints - *As of March 15, 2023*

All Open Enforcement Complaints

All Open Complaint Types

CPE Deficiency	192
Acts Discreditable	2
Due Professional Care	30
Unlicensed Activity	45
Peer Review	1
	270

New and Closed Complaints - January 1, 2023 to March 15, 2023

Opened Complaints

Closed Complaints

Opened Complaint Types

CPE Deficiency	67
Due Professional Care/Acts Dis.	7
Unlicensed Activity	35
Peer Review	1
	110

Closed Complaint Types

CPE Deficiency	107
Due Professional Care	9
Unlicensed Activity	26
Acts Discreditable	2
	144

Disposition Types

Advisory Letter	24	Board Order	9
Consent Order	90	Closed Agency Referral	1
No Finding	2	No Violation	11
No Jurisdiction	3	Other	4
144			

CPE Audit Report as of December 31, 2022						
	Ending 02/28/2023	**Year Ending 6/30/2022**	**Year Ending 6/30/2021**	**Year ending 6/30/2020**	**Year Ending 6/30/2019**	**Year Ending 6/30/2018**
CPE Audits Selected	429	573	751	696	1366	1938
CPE Audits Passed	203	429	597	544	1139	1526
CPE Audits Deficient	48	130	154	152	227	412
CPE Audits Pending	178	14	0	0	0	0
CPE Deficiency Rate	19%	23%	21%	22%	17%	21%

Other audits completed during Calendar Years						
	Reinstatement and Inactive Audits			Self-Report Audits		Enforcement Audits
	2023	**2022**	**2021**	**2023**	**2022**	**2022**
Audits Selected	40	444	273	28	224	43
CPE Audits Passed	24	367	262	0	46	29
CPE Audits Deficient	0	0	0	15	177	14
CPE Audits Pending	16	77	11	13	1	0
						33%

All Enforcement Cases

Complaint #	Type	Status	Disposition	Date Received	Date Entered	Status Date	TotalDays
2020-072-029D	Due Professional Care	IFF Pending		10-Dec-20	N/A	15-Mar-23	825
2020-073-030D	Due Professional Care	IFF Pending		21-Dec-20	N/A	15-Mar-23	814
2021-018-011U	Unlicensed Use	IFF Pending		8-Apr-21	N/A	15-Mar-23	706
2021-0086	Due Professional Care	IFF - Pending		Aug 25, 2021	Oct 18, 2021	Nov 10, 2022	567
2021-0089	Unlicensed Activity - O	Board Meeting - Pending		Sep 5, 2021	Oct 18, 2021	Feb 24, 2023	556
2021-0091	Due Professional Care	NOAV - Sent		Sep 8, 2021	Oct 18, 2021	Jun 24, 2022	553
2021-0088	Unlicensed Activity - O	NOAV - Sent		Oct 18, 2021	Oct 18, 2021	Oct 19, 2022	513
2021-0128	Due Professional Care	NOAV - Sent		Nov 23, 2021	Nov 23, 2021	Sep 28, 2022	477
2021-0145	Unlicensed Activity - O	NOAV - Sent		Dec 10, 2021	Dec 10, 2021	Sep 26, 2022	460
2021-0156	Due Professional Care	NOAV - Sent		Dec 22, 2021	Dec 22, 2021	Jun 8, 2022	448
2022-0046	Due Professional Care	NOAV - Sent		Jan 27, 2022	Jan 27, 2022	May 19, 2022	412
2022-0070	Due Professional Care	Board Meeting - Pending		Feb 14, 2022	Feb 14, 2022	Mar 9, 2023	394
2022-0084	Unlicensed Activity - G	NOAV - Sent		Feb 24, 2022	Feb 28, 2022	May 19, 2022	384
2022-0107	Due Professional Care	NOAV - Sent		Feb 25, 2022	Mar 8, 2022	May 19, 2022	383
2022-0237	Unlicensed Activity - O	Board Meeting - Pending		Apr 22, 2022	Apr 22, 2022	Feb 16, 2023	327
2022-0278	Due Professional Care	NOAV - Sent		Apr 28, 2022	May 9, 2022	May 23, 2022	321
2022-0260	Unlicensed Activity - O	Board Meeting - Pending		May 2, 2022	May 2, 2022	Feb 24, 2023	317
2022-0267	Unlicensed Activity - O	NOAV - Sent		May 3, 2022	May 3, 2022	Aug 5, 2022	316
2022-0345	Unlicensed Activity - O	NOAV - Sent		Jun 2, 2022	Jun 2, 2022	Jan 30, 2023	286
2022-0347	Due Professional Care	NOAV - Sent		Jun 3, 2022	Jun 3, 2022	Jun 22, 2022	285
2022-0363	Due Professional Care	NOAV - Sent		Jun 3, 2022	Jun 21, 2022	Jun 22, 2022	285
2022-0358	Unlicensed Activity - O	NOAV - Sent		Jun 15, 2022	Jun 15, 2022	Oct 24, 2022	273
2022-0362	Unlicensed Activity - O	NOAV - Sent		Jun 21, 2022	Jun 21, 2022	Aug 3, 2022	267
2022-0366	Unlicensed Activity - O	NOAV - Sent		Jun 28, 2022	Jun 24, 2022	Sep 12, 2022	260
2022-0378	Unlicensed Activity - O	Board Meeting - Pending		Jul 13, 2022	Jul 13, 2022	Mar 9, 2023	245
2022-0379	Unlicensed Activity - O	NOAV - Sent		Jul 14, 2022	Jul 14, 2022	Dec 5, 2022	244
2022-0384	Due Professional Care	NOAV - Sent		Jul 19, 2022	Jul 19, 2022	Jul 25, 2022	239
2022-0385	Unlicensed Activity - O	Board Meeting - Pending		Jul 20, 2022	Jul 20, 2022	Mar 6, 2023	238
2022-0392	Due Professional Care	NOAV - Sent		Jul 25, 2022	Jul 25, 2022	Oct 24, 2022	233
2022-0393	Due Professional Care	NOAV - Sent		Jul 25, 2022	Jul 25, 2022	Oct 24, 2022	233
2022-0398	Due Professional Care	NOAV - Sent		Jul 26, 2022	Jul 26, 2022	Feb 22, 2023	232
2022-0404	Unlicensed Activity - O	NOAV - Sent		Jul 28, 2022	Jul 28, 2022	Sep 19, 2022	230
2022-0423	Due Professional Care	NOAV - Pending		Aug 5, 2022	Aug 8, 2022	Aug 8, 2022	222

2022-0557	Acts Discreditable	NOAV - Sent	Aug 22, 2022	Sep 29, 2022	Oct 3, 2022		205
2022-0501	Unlicensed Activity - O	NOAV - Sent	Sep 7, 2022	Sep 7, 2022	Sep 8, 2022	32	189
2022-0502	Due Professional Care	NOAV - Sent	Sep 8, 2022	Sep 8, 2022	Nov 10, 2022		188
2022-0505	Due Professional Care	IFF - Pending	Sep 8, 2022	Sep 8, 2022	Mar 15, 2023		188
2022-0506	Due Professional Care	IFF - Pending	Sep 8, 2022	Sep 8, 2022	Mar 15, 2023		188
2022-0536	Unlicensed Activity - O	NOAV - Sent	Sep 12, 2022	Sep 13, 2022	Dec 28, 2022		184
2022-0537	Unlicensed Activity - O	NOAV - Sent	Sep 13, 2022	Sep 13, 2022	Sep 27, 2022		183
2022-0545	Due Professional Care	Entered / Intake	Sep 15, 2022	Sep 15, 2022	Sep 15, 2022		181
2022-0547	Due Professional Care	NOAV - Sent	Sep 16, 2022	Sep 16, 2022	Sep 30, 2022		180
2022-0555	Unlicensed Activity - O	NOAV - Sent	Sep 23, 2022	Sep 26, 2022	Sep 26, 2022		173
2022-0556	Due Professional Care	Requested Additional Information	Sep 27, 2022	Sep 27, 2022	Jan 30, 2023		169
2022-0563	Unlicensed Activity - O	NOAV - Sent	Sep 29, 2022	Oct 5, 2022	Oct 6, 2022		167
2022-0558	Due Professional Care	NOAV - Pending	Oct 4, 2022	Oct 4, 2022	Oct 4, 2022		162
2022-0561	Acts Discreditable	IFF - Scheduled	Oct 4, 2022	Oct 4, 2022	Oct 4, 2022		162
2022-0562	Unlicensed Activity - O	Board Meeting - Pending	Oct 4, 2022	Oct 4, 2022	Jan 20, 2023		162
2022-0572	Unlicensed Activity - O	NOAV - Sent	Oct 7, 2022	Oct 7, 2022	Feb 1, 2023		159
2022-0690	Due Professional Care	NOAV - Pending	Nov 29, 2022	Nov 29, 2022	Nov 29, 2022		106
2022-0696	Unlicensed Activity - O	NOAV - Sent	Dec 1, 2022	Dec 1, 2022	Feb 1, 2023		104
2022-0701	Due Professional Care	NOAV - Sent	Dec 2, 2022	Dec 2, 2022	Dec 2, 2022		103
2022-0721	Due Professional Care	NOAV - Pending	Dec 9, 2022	Dec 9, 2022	Dec 9, 2022		96
2022-0732	Unlicensed Activity - O	NOAV - Sent	Dec 12, 2022	Dec 12, 2022	Jan 31, 2023		93
2022-0733	Unlicensed Activity - O	NOAV - Sent	Dec 13, 2022	Dec 13, 2022	Mar 13, 2023		92
2022-0736	Due Professional Care	NOAV - Sent	Dec 13, 2022	Dec 13, 2022	Jan 30, 2023		92
2023-0012	Unlicensed Activity - O	NOAV - Sent	Jan 12, 2023	Jan 12, 2023	Jan 13, 2023		62
2023-0030	Unlicensed Activity - G	Board Meeting - Pending	Jan 23, 2023	Jan 23, 2023	Mar 15, 2023		51
2023-0031	Unlicensed Activity - G	IFF - Scheduled	Jan 24, 2023	Jan 24, 2023	Feb 24, 2023		50
2023-0033	Unlicensed Activity - O	Entered / Intake	Jan 24, 2023	Jan 24, 2023	Jan 24, 2023		50
2023-0037	Unlicensed Activity - G	IFF - Completed	Jan 25, 2023	Jan 26, 2023	Mar 15, 2023		49
2023-0045	Unlicensed Activity - O	Open Case	Feb 1, 2023	Feb 1, 2023	Feb 1, 2023		42
2023-0062	Unlicensed Activity - G	Requested Additional Information	Feb 14, 2023	Feb 14, 2023	Feb 14, 2023		29
2023-0069	Unlicensed Activity - O	Entered / Intake	Feb 16, 2023	Feb 16, 2023	Feb 16, 2023		27
2023-0070	Unlicensed Activity - O	Entered / Intake	Feb 16, 2023	Feb 16, 2023	Feb 16, 2023		27
2023-0102	Unlicensed Activity - G	Consent Order - Sent	Feb 16, 2023	Mar 7, 2023	Mar 8, 2023		27
2023-0071	Unlicensed Activity - O	Entered / Intake	Feb 17, 2023	Feb 17, 2023	Feb 17, 2023		26
2023-0072	Unlicensed Activity - O	Entered / Intake	Feb 17, 2023	Feb 17, 2023	Feb 17, 2023		26

2023-0073	Unlicensed Activity - O	Entered / Intake	Feb 17, 2023	Feb 17, 2023	Feb 17, 2023	33	26
2023-0074	Unlicensed Activity - O	Entered / Intake	Feb 17, 2023	Feb 17, 2023	Feb 17, 2023		26
2023-0075	Unlicensed Activity - O	Entered / Intake	Feb 17, 2023	Feb 17, 2023	Feb 17, 2023		26
2023-0076	Unlicensed Activity - O	Entered / Intake	Feb 17, 2023	Feb 17, 2023	Feb 17, 2023		26
2023-0077	Unlicensed Activity - O	Entered / Intake	Feb 17, 2023	Feb 17, 2023	Feb 17, 2023		26
2023-0081	Peer Review	Open Case	Feb 22, 2023	Feb 22, 2023	Feb 22, 2023		21
2023-0082	Unlicensed Activity - O	Open Case	Feb 22, 2023	Feb 22, 2023	Feb 22, 2023		21
2023-0108	Unlicensed Activity - O	NOAV - Pending	Feb 26, 2023	Mar 9, 2023	Mar 9, 2023		17
2023-0092	Due Professional Care	NOAV - Pending	Mar 3, 2023	Mar 3, 2023	Mar 3, 2023		12
2023-0110	Due Professional Care	NOAV - Sent	Mar 13, 2023	Mar 13, 2023	Mar 13, 2023		2

All Enforcement Cases

Complaint #	Type	Status	Disposition	Date Received	Date Entered	Status Date	TotalDays
2023-0051	CPE Deficiency	Consent Order - Sent		Aug 5, 2021	Feb 2, 2023	Mar 8, 2023	587
2022-0198	CPE Deficiency	IFF - Completed		Apr 14, 2022	Apr 14, 2022	Sep 20, 2022	335
2022-0206	CPE Deficiency	IFF - Completed		Apr 15, 2022	Apr 15, 2022	Jul 27, 2022	334
2022-0246	CPE Deficiency	Board Meeting - Pending		Apr 25, 2022	Apr 25, 2022	Mar 7, 2023	324
2022-0252	CPE Deficiency	IFF - Completed		Apr 28, 2022	Apr 28, 2022	Sep 30, 2022	321
2022-0253	CPE Deficiency	IFF - Completed		Apr 28, 2022	Apr 28, 2022	Jul 27, 2022	321
2022-0262	CPE Deficiency	IFF - Completed		May 3, 2022	May 3, 2022	Sep 20, 2022	316
2022-0263	CPE Deficiency	IFF - Completed		May 3, 2022	May 3, 2022	Sep 20, 2022	316
2022-0264	CPE Deficiency	IFF - Completed		May 3, 2022	May 3, 2022	Sep 20, 2022	316
2022-0309	CPE Deficiency	IFF - Completed		May 17, 2022	May 17, 2022	Nov 7, 2022	302
2022-0321	CPE Deficiency	IFF - Completed		May 20, 2022	May 20, 2022	Oct 12, 2022	299
2022-0328	CPE Deficiency	Requested Additional Information		May 23, 2022	May 23, 2022	Jul 26, 2022	296
2022-0333	CPE Deficiency	IFF - Completed		May 24, 2022	May 24, 2022	Dec 19, 2022	295
2022-0348	CPE Deficiency	Board Meeting - Pending		Jun 6, 2022	Jun 6, 2022	Feb 24, 2023	282
2022-0359	CPE Deficiency	Consent Order - Sent		Jun 16, 2022	Jun 16, 2022	Sep 20, 2022	272
2022-0369	CPE Deficiency	IFF - Completed		Jun 27, 2022	Jun 27, 2022	Sep 20, 2022	261
2022-0408	CPE Deficiency	IFF - Completed		Aug 1, 2022	Aug 1, 2022	Feb 14, 2023	226
2022-0411	CPE Deficiency	IFF - Completed		Aug 2, 2022	Aug 2, 2022	Dec 19, 2022	225
2022-0434	CPE Deficiency	Entered / Intake		Aug 18, 2022	Aug 18, 2022	Aug 18, 2022	209
2022-0435	CPE Deficiency	IFF - Scheduled		Aug 18, 2022	Aug 18, 2022	Dec 2, 2022	209
2022-0436	CPE Deficiency	IFF - Completed		Aug 18, 2022	Aug 18, 2022	Jan 12, 2023	209
2022-0437	CPE Deficiency	IFF - Completed		Aug 18, 2022	Aug 18, 2022	Jan 31, 2023	209
2022-0445	CPE Deficiency	IFF - Completed		Aug 19, 2022	Aug 19, 2022	Jan 31, 2023	208
2022-0453	CPE Deficiency	IFF - Completed		Aug 22, 2022	Aug 22, 2022	Jan 5, 2023	205
2022-0455	CPE Deficiency	IFF - Completed		Aug 23, 2022	Aug 23, 2022	Jan 12, 2023	204
2022-0466	CPE Deficiency	IFF - Completed		Aug 25, 2022	Aug 25, 2022	Jan 31, 2023	202
2022-0479	CPE Deficiency	Consent Order - Sent		Aug 30, 2022	Aug 30, 2022	Jan 31, 2023	197
2022-0482	CPE Deficiency	IFF - Scheduled		Aug 30, 2022	Aug 30, 2022	Feb 24, 2023	197
2022-0485	CPE Deficiency	IFF - Scheduled		Aug 31, 2022	Aug 31, 2022	Feb 24, 2023	196
2022-0486	CPE Deficiency	IFF - Scheduled		Aug 31, 2022	Aug 31, 2022	Feb 24, 2023	196
2022-0490	CPE Deficiency	IFF - Scheduled		Sep 1, 2022	Sep 1, 2022	Feb 24, 2023	195
2022-0500	CPE Deficiency	IFF - Scheduled		Sep 7, 2022	Sep 7, 2022	Feb 24, 2023	189
2022-0508	CPE Deficiency	IFF - Scheduled		Sep 8, 2022	Sep 8, 2022	Feb 24, 2023	188

2022-0511	CPE Deficiency	IFF - Scheduled	Sep 8, 2022	Sep 8, 2022	Feb 24, 2023	35	188
2022-0524	CPE Deficiency	Consent Order - Sent	Sep 9, 2022	Sep 9, 2022	Mar 8, 2023		187
2022-0529	CPE Deficiency	IFF - Pending	Sep 12, 2022	Sep 12, 2022	Mar 14, 2023		184
2022-0530	CPE Deficiency	IFF - Scheduled	Sep 12, 2022	Sep 12, 2022	Feb 24, 2023		184
2022-0551	CPE Deficiency	IFF - Scheduled	Sep 23, 2022	Sep 23, 2022	Feb 24, 2023		173
2022-0553	CPE Deficiency	IFF - Scheduled	Sep 23, 2022	Sep 23, 2022	Feb 24, 2023		173
2022-0554	CPE Deficiency	Consent Order - Sent	Sep 23, 2022	Sep 23, 2022	Feb 6, 2023		173
2022-0560	CPE Deficiency	IFF - Scheduled	Oct 4, 2022	Oct 4, 2022	Feb 24, 2023		162
2022-0570	CPE Deficiency	IFF - Scheduled	Oct 6, 2022	Oct 6, 2022	Feb 24, 2023		160
2022-0579	CPE Deficiency	IFF - Completed	Oct 12, 2022	Oct 12, 2022	Feb 14, 2023		154
2022-0581	CPE Deficiency	IFF - Pending	Oct 12, 2022	Oct 12, 2022	Mar 14, 2023		154
2022-0589	CPE Deficiency	Consent Order - Sent	Oct 13, 2022	Oct 13, 2022	Feb 24, 2023		153
2022-0590	CPE Deficiency	IFF - Pending	Oct 13, 2022	Oct 13, 2022	Mar 14, 2023		153
2022-0591	CPE Deficiency	IFF - Scheduled	Oct 13, 2022	Oct 13, 2022	Feb 24, 2023		153
2022-0595	CPE Deficiency	Consent Order - Sent	Oct 13, 2022	Oct 13, 2022	Feb 9, 2023		153
2022-0599	CPE Deficiency	IFF - Pending	Oct 13, 2022	Oct 13, 2022	Mar 15, 2023		153
2022-0602	CPE Deficiency	IFF - Pending	Oct 14, 2022	Oct 14, 2022	Mar 6, 2023		152
2022-0603	CPE Deficiency	IFF - Scheduled	Oct 14, 2022	Oct 14, 2022	Feb 24, 2023		152
2022-0615	CPE Deficiency	IFF - Scheduled	Oct 27, 2022	Oct 27, 2022	Feb 24, 2023		139
2022-0617	CPE Deficiency	IFF - Pending	Oct 27, 2022	Oct 27, 2022	Feb 28, 2023		139
2022-0623	CPE Deficiency	Consent Order - Sent	Oct 31, 2022	Oct 31, 2022	Feb 14, 2023		135
2022-0625	CPE Deficiency	Consent Order - Sent	Nov 2, 2022	Nov 2, 2022	Mar 15, 2023		133
2022-0626	CPE Deficiency	Board Meeting - Pending	Nov 2, 2022	Nov 2, 2022	Mar 7, 2023		133
2022-0639	CPE Deficiency	IFF - Scheduled	Nov 2, 2022	Nov 2, 2022	Feb 24, 2023		133
2022-0640	CPE Deficiency	IFF - Completed	Nov 2, 2022	Nov 2, 2022	Jan 5, 2023		133
2022-0646	CPE Deficiency	IFF - Scheduled	Nov 3, 2022	Nov 3, 2022	Feb 24, 2023		132
2022-0649	CPE Deficiency	IFF - Scheduled	Nov 3, 2022	Nov 3, 2022	Feb 24, 2023		132
2022-0656	CPE Deficiency	IFF - Completed	Nov 9, 2022	Nov 9, 2022	Jan 12, 2023		126
2022-0661	CPE Deficiency	Consent Order - Sent	Nov 10, 2022	Nov 10, 2022	Mar 14, 2023		125
2022-0662	CPE Deficiency	Consent Order - Sent	Nov 14, 2022	Nov 14, 2022	Mar 14, 2023		121
2022-0663	CPE Deficiency	Consent Order - Sent	Nov 14, 2022	Nov 14, 2022	Mar 14, 2023		121
2022-0664	CPE Deficiency	Consent Order - Sent	Nov 14, 2022	Nov 14, 2022	Mar 14, 2023		121
2022-0665	CPE Deficiency	Consent Order - Sent	Nov 14, 2022	Nov 14, 2022	Mar 14, 2023		121
2022-0666	CPE Deficiency	Consent Order - Sent	Nov 14, 2022	Nov 14, 2022	Mar 14, 2023		121
2022-0667	CPE Deficiency	Consent Order - Sent	Nov 15, 2022	Nov 15, 2022	Mar 14, 2023		120

2022-0668	CPE Deficiency	Consent Order - Sent	Nov 15, 2022	Nov 15, 2022	Mar 14, 2023	120
2022-0669	CPE Deficiency	Consent Order - Sent	Nov 15, 2022	Nov 15, 2022	Mar 14, 2023	120
2022-0671	CPE Deficiency	Consent Order - Sent	Nov 16, 2022	Nov 16, 2022	Mar 14, 2023	119
2022-0672	CPE Deficiency	Consent Order - Draft	Nov 16, 2022	Nov 16, 2022	Mar 16, 2023	119
2022-0673	CPE Deficiency	Consent Order - Draft	Nov 16, 2022	Nov 16, 2022	Mar 16, 2023	119
2022-0674	CPE Deficiency	Entered / Intake	Nov 16, 2022	Nov 16, 2022	Nov 16, 2022	119
2022-0675	CPE Deficiency	Consent Order - Draft	Nov 16, 2022	Nov 16, 2022	Mar 16, 2023	119
2022-0677	CPE Deficiency	Consent Order - Draft	Nov 17, 2022	Nov 17, 2022	Mar 16, 2023	118
2022-0679	CPE Deficiency	IFF - Pending	Nov 21, 2022	Nov 21, 2022	Mar 16, 2023	114
2022-0680	CPE Deficiency	IFF - Pending	Nov 21, 2022	Nov 21, 2022	Mar 15, 2023	114
2022-0683	CPE Deficiency	IFF - Pending	Nov 22, 2022	Nov 22, 2022	Mar 6, 2023	113
2022-0684	CPE Deficiency	Consent Order - Sent	Nov 22, 2022	Nov 22, 2022	Feb 22, 2023	113
2022-0685	CPE Deficiency	Consent Order - Sent	Nov 23, 2022	Nov 23, 2022	Feb 27, 2023	112
2022-0686	CPE Deficiency	IFF - Completed	Nov 23, 2022	Nov 23, 2022	Jan 31, 2023	112
2022-0687	CPE Deficiency	Consent Order - Draft	Nov 28, 2022	Nov 28, 2022	Feb 21, 2023	107
2022-0688	CPE Deficiency	Consent Order - Draft	Nov 28, 2022	Nov 28, 2022	Mar 16, 2023	107
2022-0691	CPE Deficiency	Entered / Intake	Nov 29, 2022	Nov 29, 2022	Nov 29, 2022	106
2022-0692	CPE Deficiency	Entered / Intake	Nov 29, 2022	Nov 29, 2022	Nov 29, 2022	106
2022-0693	CPE Deficiency	Entered / Intake	Nov 29, 2022	Nov 29, 2022	Nov 29, 2022	106
2022-0695	CPE Deficiency	IFF - Scheduled	Dec 1, 2022	Dec 1, 2022	Feb 24, 2023	104
2022-0697	CPE Deficiency	Entered / Intake	Dec 1, 2022	Dec 1, 2022	Dec 1, 2022	104
2022-0698	CPE Deficiency	Entered / Intake	Dec 1, 2022	Dec 1, 2022	Dec 1, 2022	104
2022-0699	CPE Deficiency	Entered / Intake	Dec 1, 2022	Dec 1, 2022	Dec 1, 2022	104
2022-0703	CPE Deficiency	Consent Order - Sent	Dec 5, 2022	Dec 5, 2022	Feb 15, 2023	100
2022-0704	CPE Deficiency	Entered / Intake	Dec 6, 2022	Dec 6, 2022	Dec 6, 2022	99
2022-0705	CPE Deficiency	Entered / Intake	Dec 6, 2022	Dec 6, 2022	Dec 6, 2022	99
2022-0706	CPE Deficiency	Entered / Intake	Dec 6, 2022	Dec 6, 2022	Dec 6, 2022	99
2022-0707	CPE Deficiency	Entered / Intake	Dec 6, 2022	Dec 6, 2022	Dec 6, 2022	99
2022-0708	CPE Deficiency	Entered / Intake	Dec 6, 2022	Dec 6, 2022	Dec 6, 2022	99
2022-0709	CPE Deficiency	Entered / Intake	Dec 6, 2022	Dec 6, 2022	Dec 6, 2022	99
2022-0710	CPE Deficiency	Entered / Intake	Dec 6, 2022	Dec 6, 2022	Dec 6, 2022	99
2022-0711	CPE Deficiency	Entered / Intake	Dec 7, 2022	Dec 7, 2022	Dec 7, 2022	98
2022-0714	CPE Deficiency	Entered / Intake	Dec 7, 2022	Dec 7, 2022	Dec 7, 2022	98
2022-0715	CPE Deficiency	Entered / Intake	Dec 7, 2022	Dec 7, 2022	Dec 7, 2022	98
2022-0717	CPE Deficiency	Entered / Intake	Dec 7, 2022	Dec 7, 2022	Dec 7, 2022	98

2022-0718	CPE Deficiency	Entered / Intake	Dec 7, 2022	Dec 7, 2022	Dec 7, 2022		98
2022-0719	CPE Deficiency	Entered / Intake	Dec 7, 2022	Dec 7, 2022	Dec 7, 2022	37	98
2022-0723	CPE Deficiency	Entered / Intake	Dec 9, 2022	Dec 9, 2022	Dec 9, 2022		96
2022-0724	CPE Deficiency	Entered / Intake	Dec 9, 2022	Dec 9, 2022	Dec 9, 2022		96
2022-0726	CPE Deficiency	Entered / Intake	Dec 9, 2022	Dec 9, 2022	Dec 9, 2022		96
2022-0727	CPE Deficiency	Entered / Intake	Dec 9, 2022	Dec 9, 2022	Dec 9, 2022		96
2022-0729	CPE Deficiency	Entered / Intake	Dec 12, 2022	Dec 12, 2022	Dec 12, 2022		93
2022-0730	CPE Deficiency	Entered / Intake	Dec 12, 2022	Dec 12, 2022	Dec 12, 2022		93
2022-0731	CPE Deficiency	Entered / Intake	Dec 12, 2022	Dec 12, 2022	Dec 12, 2022		93
2022-0739	CPE Deficiency	Entered / Intake	Dec 19, 2022	Dec 19, 2022	Dec 19, 2022		86
2022-0740	CPE Deficiency	Entered / Intake	Dec 19, 2022	Dec 19, 2022	Dec 19, 2022		86
2022-0741	CPE Deficiency	Entered / Intake	Dec 19, 2022	Dec 19, 2022	Dec 19, 2022		86
2022-0742	CPE Deficiency	Entered / Intake	Dec 19, 2022	Dec 19, 2022	Dec 19, 2022		86
2022-0743	CPE Deficiency	Consent Order - Draft	Dec 20, 2022	Dec 20, 2022	Mar 16, 2023		85
2022-0744	CPE Deficiency	Entered / Intake	Dec 20, 2022	Dec 20, 2022	Dec 20, 2022		85
2022-0747	CPE Deficiency	Entered / Intake	Dec 21, 2022	Dec 21, 2022	Dec 21, 2022		84
2022-0748	CPE Deficiency	Entered / Intake	Dec 27, 2022	Dec 27, 2022	Dec 27, 2022		78
2022-0749	CPE Deficiency	Entered / Intake	Dec 28, 2022	Dec 28, 2022	Dec 28, 2022		77
2022-0750	CPE Deficiency	Entered / Intake	Dec 28, 2022	Dec 28, 2022	Dec 28, 2022		77
2022-0751	CPE Deficiency	Entered / Intake	Dec 28, 2022	Dec 28, 2022	Dec 28, 2022		77
2022-0752	CPE Deficiency	Entered / Intake	Dec 29, 2022	Dec 29, 2022	Dec 29, 2022		76
2022-0754	CPE Deficiency	Entered / Intake	Dec 29, 2022	Dec 29, 2022	Dec 29, 2022		76
2022-0756	CPE Deficiency	Entered / Intake	Dec 29, 2022	Dec 29, 2022	Dec 29, 2022		76
2022-0757	CPE Deficiency	Entered / Intake	Dec 29, 2022	Dec 29, 2022	Dec 29, 2022		76
2022-0758	CPE Deficiency	Entered / Intake	Dec 29, 2022	Dec 29, 2022	Dec 29, 2022		76
2023-0001	CPE Deficiency	Entered / Intake	Jan 3, 2023	Jan 3, 2023	Jan 3, 2023		71
2023-0004	CPE Deficiency	Entered / Intake	Jan 4, 2023	Jan 4, 2023	Jan 4, 2023		70
2023-0006	CPE Deficiency	Entered / Intake	Jan 5, 2023	Jan 5, 2023	Jan 5, 2023		69
2023-0008	CPE Deficiency	Entered / Intake	Jan 9, 2023	Jan 9, 2023	Jan 9, 2023		65
2023-0015	CPE Deficiency	Entered / Intake	Jan 13, 2023	Jan 13, 2023	Jan 13, 2023		61
2023-0017	CPE Deficiency	Entered / Intake	Jan 18, 2023	Jan 18, 2023	Jan 18, 2023		56
2023-0018	CPE Deficiency	Entered / Intake	Jan 18, 2023	Jan 18, 2023	Jan 18, 2023		56
2023-0019	CPE Deficiency	Entered / Intake	Jan 18, 2023	Jan 18, 2023	Jan 18, 2023		56
2023-0020	CPE Deficiency	Entered / Intake	Jan 18, 2023	Jan 18, 2023	Jan 18, 2023		56
2023-0021	CPE Deficiency	Entered / Intake	Jan 19, 2023	Jan 19, 2023	Jan 19, 2023		55

2023-0022	CPE Deficiency	Entered / Intake	Jan 19, 2023	Jan 19, 2023	Jan 19, 2023	55
2023-0023	CPE Deficiency	Entered / Intake	Jan 20, 2023	Jan 20, 2023	Jan 20, 2023	54
2023-0025	CPE Deficiency	Entered / Intake	Jan 20, 2023	Jan 20, 2023	Jan 20, 2023	54
2023-0026	CPE Deficiency	Entered / Intake	Jan 20, 2023	Jan 20, 2023	Jan 20, 2023	54
2023-0034	CPE Deficiency	Entered / Intake	Jan 25, 2023	Jan 25, 2023	Jan 25, 2023	49
2023-0035	CPE Deficiency	Entered / Intake	Jan 26, 2023	Jan 26, 2023	Jan 26, 2023	48
2023-0036	CPE Deficiency	Entered / Intake	Jan 26, 2023	Jan 26, 2023	Jan 26, 2023	48
2023-0040	CPE Deficiency	Entered / Intake	Jan 30, 2023	Jan 30, 2023	Jan 30, 2023	44
2023-0041	CPE Deficiency	Entered / Intake	Jan 31, 2023	Jan 31, 2023	Jan 31, 2023	43
2023-0042	CPE Deficiency	Entered / Intake	Jan 31, 2023	Jan 31, 2023	Jan 31, 2023	43
2023-0043	CPE Deficiency	Entered / Intake	Jan 31, 2023	Jan 31, 2023	Jan 31, 2023	43
2023-0044	CPE Deficiency	Entered / Intake	Feb 1, 2023	Feb 1, 2023	Feb 1, 2023	42
2023-0046	CPE Deficiency	IFF - Scheduled	Feb 1, 2023	Feb 1, 2023	Feb 24, 2023	42
2023-0047	CPE Deficiency	IFF - Scheduled	Feb 1, 2023	Feb 1, 2023	Feb 24, 2023	42
2023-0048	CPE Deficiency	Open Case	Feb 1, 2023	Feb 1, 2023	Feb 1, 2023	42
2023-0052	CPE Deficiency	Entered / Intake	Feb 3, 2023	Feb 3, 2023	Feb 3, 2023	40
2023-0053	CPE Deficiency	Entered / Intake	Feb 6, 2023	Feb 6, 2023	Feb 6, 2023	37
2023-0054	CPE Deficiency	Entered / Intake	Feb 6, 2023	Feb 6, 2023	Feb 6, 2023	37
2023-0055	CPE Deficiency	Entered / Intake	Feb 7, 2023	Feb 7, 2023	Feb 7, 2023	36
2023-0057	CPE Deficiency	Entered / Intake	Feb 10, 2023	Feb 10, 2023	Feb 10, 2023	33
2023-0058	CPE Deficiency	Entered / Intake	Feb 13, 2023	Feb 13, 2023	Feb 13, 2023	30
2023-0059	CPE Deficiency	Entered / Intake	Feb 13, 2023	Feb 13, 2023	Feb 13, 2023	30
2023-0061	CPE Deficiency	Entered / Intake	Feb 13, 2023	Feb 13, 2023	Feb 13, 2023	30
2023-0063	CPE Deficiency	Entered / Intake	Feb 14, 2023	Feb 14, 2023	Feb 14, 2023	29
2023-0064	CPE Deficiency	Entered / Intake	Feb 14, 2023	Feb 14, 2023	Feb 14, 2023	29
2023-0065	CPE Deficiency	Entered / Intake	Feb 15, 2023	Feb 15, 2023	Feb 15, 2023	28
2023-0066	CPE Deficiency	Entered / Intake	Feb 15, 2023	Feb 15, 2023	Feb 15, 2023	28
2023-0067	CPE Deficiency	Entered / Intake	Feb 15, 2023	Feb 15, 2023	Feb 15, 2023	28
2023-0068	CPE Deficiency	Entered / Intake	Feb 16, 2023	Feb 16, 2023	Feb 16, 2023	27
2023-0078	CPE Deficiency	Entered / Intake	Feb 21, 2023	Feb 21, 2023	Feb 21, 2023	22
2023-0079	CPE Deficiency	Entered / Intake	Feb 22, 2023	Feb 22, 2023	Feb 22, 2023	21
2023-0080	CPE Deficiency	Entered / Intake	Feb 22, 2023	Feb 22, 2023	Feb 22, 2023	21
2023-0083	CPE Deficiency	Entered / Intake	Feb 24, 2023	Feb 24, 2023	Feb 24, 2023	19
2023-0085	CPE Deficiency	Entered / Intake	Feb 27, 2023	Feb 27, 2023	Feb 27, 2023	16
2023-0086	CPE Deficiency	Entered / Intake	Feb 27, 2023	Feb 27, 2023	Feb 27, 2023	16

2023-0087	CPE Deficiency	Entered / Intake	Feb 27, 2023	Feb 27, 2023	Feb 27, 2023	39	16
2023-0088	CPE Deficiency	Entered / Intake	Mar 2, 2023	Mar 2, 2023	Mar 2, 2023		13
2023-0089	CPE Deficiency	Entered / Intake	Mar 2, 2023	Mar 2, 2023	Mar 2, 2023		13
2023-0090	CPE Deficiency	Entered / Intake	Mar 2, 2023	Mar 2, 2023	Mar 2, 2023		13
2023-0091	CPE Deficiency	Entered / Intake	Mar 3, 2023	Mar 3, 2023	Mar 3, 2023		12
2023-0093	CPE Deficiency	Entered / Intake	Mar 3, 2023	Mar 3, 2023	Mar 3, 2023		12
2023-0094	CPE Deficiency	Entered / Intake	Mar 3, 2023	Mar 3, 2023	Mar 3, 2023		12
2023-0095	CPE Deficiency	Entered / Intake	Mar 3, 2023	Mar 3, 2023	Mar 3, 2023		12
2023-0096	CPE Deficiency	Entered / Intake	Mar 3, 2023	Mar 3, 2023	Mar 3, 2023		12
2023-0097	CPE Deficiency	Entered / Intake	Mar 6, 2023	Mar 6, 2023	Mar 6, 2023		9
2023-0098	CPE Deficiency	Entered / Intake	Mar 7, 2023	Mar 7, 2023	Mar 7, 2023		8
2023-0099	CPE Deficiency	Entered / Intake	Mar 7, 2023	Mar 7, 2023	Mar 7, 2023		8
2023-0100	CPE Deficiency	Entered / Intake	Mar 7, 2023	Mar 7, 2023	Mar 7, 2023		8
2023-0101	CPE Deficiency	Entered / Intake	Mar 7, 2023	Mar 7, 2023	Mar 7, 2023		8
2023-0104	CPE Deficiency	Entered / Intake	Mar 9, 2023	Mar 9, 2023	Mar 9, 2023		6
2023-0105	CPE Deficiency	Entered / Intake	Mar 9, 2023	Mar 9, 2023	Mar 9, 2023		6
2023-0109	CPE Deficiency	Entered / Intake	Mar 10, 2023	Mar 10, 2023	Mar 10, 2023		5
2023-0111	CPE Deficiency	Entered / Intake	Mar 14, 2023	Mar 14, 2023	Mar 14, 2023		1
2023-0112	CPE Deficiency	Entered / Intake	Mar 15, 2023	Mar 15, 2023	Mar 15, 2023		0

NASBA

National Association of State Boards of Accountancy

February 15, 2023

TO: State Boards of Accountancy and other interested parties

FROM: Nicola Neilon, Chair – NASBA Uniform Accountancy Act Committee

As approved by the NASBA Board of Directors, we are releasing for a 60-day comment period, a revised exposure draft incorporating additional proposed amendments to the Uniform Accountancy Act's Model Rules that pertain to the examination. The original amendments were developed by the NASBA CBT Administration Committee and reviewed by the NASBA Uniform Accountancy Act Committee, which recommended them to the NASBA Board for public comment at its October 11, 2022, meeting.

At its January 2023, meeting, NASBA's Board of Directors voted unanimously to support further amendments to Rule 5-7 that would increase the length of conditional credit from 18 months to 24 months and to request a review of the proposed language in Rule 5-7(e) to determine if greater clarity as to a Board's authority to allowing additional time to candidates could be gained by adding descriptive language. In February, NASBA's Uniform Accountancy Act committee met and developed the additional clarifying language. NASBA's Board of Directors approved both additional changes for exposure at its February 14, 2023, meeting.

The changes being proposed cover the granting of credit requirements for sections passed on the Uniform CPA Examination (Exam) for those wishing to enter the CPA profession. The revised exposure draft provides that once a candidate has successfully passed one section of the Exam, all jurisdictions provide candidates with a rolling twenty-four (24) month period to successfully pass the remaining sections of the examination. The date from which credit is calculated varies among the jurisdictions. In addition, recent revisions to the Exam indicate that score delays may occur when updates are made to Exam content and structure. The Committees' recommendation seeks to provide uniformity among the jurisdictions on how the granting of credit is calculated and to address possible future score delays when Exam content or structure changes occur.

As proposed, Rule 5-7 Retake and granting of credit requirements would be deleted and re-written to include:

● Rule 5-7(a) provides that a candidate may take the required Test Sections individually in any order and that credit for any Test Section passed shall be valid for twenty-four (24) months from the date the passing score was released by NASBA to the candidate or the Board.

● Rule 5-7(a)(1) provides a candidate must pass all Test Sections within a rolling twenty-four (24) month period that begins with the date the first passing score(s) are released by NASBA to the candidate or the Board. The rolling window would conclude with the sit date of the final Test Section passed, regardless of when the score is released by NASBA for the final Test

Section. If all Test Sections are not passed within twenty-four (24) months, credit for any Test Section passed outside the twenty-four (24) month period shall expire.

● Rule 5-7(b) is being proposed to prohibit a candidate from taking a failed Test Section until the candidate has been notified of the score for the most recent attempt of that failed Test Section.

● Rule 5-7(c) provides that a candidate is deemed to have passed all required Test Sections in the rolling twenty-four (24) month period.

● Rules 5-7(d) provides a candidate shall retain credit for any and all Test Sections of the examination passed as a candidate of another state if such credit would have been given under then applicable requirements in this State.

● Rule 5-7(e) provides that the period of time to pass all Test Sections of the examination may be extended by the Board upon a showing that the credit was lost by reason of individual hardship including, but not limited to, health; military service; a disruption at the local, regional, or national level impacting the candidate; or other circumstances beyond the candidate's control.

We believe these changes will provide guidance for State Boards and candidates in the years ahead. We encourage the State Boards and other interested parties to consider these proposed changes and send any comments or recommendations to the UAA Committee via uaacomments@nasba.org by April 17, 2023.

Sincerely,

Nicola Neilon

Nicola Neilon, CPA
Chair, NASBA Uniform Accountancy Act Committee

Uniform Accountancy Act Model Rules – Conditional Credit

Rule 5-7 – Retake and granting of credit requirements.

~~**(a) A Candidate may take the required Test Sections individually and in any order. Credit for any Test Section(s) passed shall be valid for a period of eighteen (18) months and be calculated from the actual date the Candidate took that Test Section, without having to attain a minimum score on any failed Test Section(s) and without regard to whether the Candidate has taken other Test Sections.**~~

~~**(1) Candidates must pass all Test Sections of the examination within a rolling eighteen (18) month period, which begins on the date that the first Test Section(s) passed is taken.**~~

~~**(2) (A) Subject to subsection 7(a)(2)(B), Candidates cannot retake a failed Test Section(s) in the same testing window. A testing window is equal to a calendar quarter (January-March, April-June, July-September, October-December). Candidates will be able to test no less than two (2) months out of each testing window.**~~

~~**(B) If the Board determines that the examination system changes necessary to eliminate the test window limitations have been implemented, subsection (A) will no longer be effective, and a Candidate can retake a Test Section once their grade for a n y previous attempt of that same Test Section has been released.**~~

~~**(3) In the event all Test Sections of the examination are not passed within the rolling eighteen (18) month period, credit for any Test Section(s) passed outside the eighteen (18) month period will expire and that Test Section(s) must be retaken.**~~

~~**(b) A Candidate shall retain credit for any and all Test Sections of the examination passed as a candidate of another state if such credit would have been given under then applicable requirements in this State.**~~

~~**(c) A Candidate shall be deemed to have passed the examination once the Candidate holds at the same time valid credit for passing each of the Test Sections of the examination. For purposes of this section, credit for passing a Test Section of the examination is valid from the actual date of the Testing Event for that Test Section, regardless of the date the Candidate actually receives notice of the passing grade.**~~

~~**(d) Notwithstanding subsection (a) of this Rule, the Board may in particular cases extend the term of credit validity upon a showing that the credit was lost by reason of circumstances beyond the Candidate's control.**~~

(a) A Candidate may take the required Test Sections individually and in any order. Credit for passing any Test Section shall be valid for that Test Section for twenty-four (24) months from the date the passing score for such Test Section is released by NASBA to the Candidate or the Board, as the case may be, regardless of the number of Test Sections taken or having to attain a minimum score on any failed section(s).

(1) A Candidate shall pass all required Test Sections within a rolling twenty-four (24) month period. The rolling twenty-four (24) month period begins on the date the first passing score(s) are released by NASBA to the Candidate or the Board, as the case may be. The rolling twenty-four (24) month period concludes on the date the Candidate sits for the final Test Section passed, regardless of when the score is released by NASBA for the final Test Section.

(2) A Candidate who earns initial credit on one or more Test Section(s) of the CPA examination must sit for and complete the remaining required Test Section(s) of the examination by midnight local time at the Board's main office on the last day of the twenty-four (24) month period.

(3) **If all required Test Sections are not passed within this initial twenty-four (24) month period, credit for the first Test Section(s) passed shall expire and a new rolling twenty-four (24) month period shall begin on the date the second passing score(s) were released by NASBA to the Candidate or the Board, as the case may be, and continue for twenty-four (24) months from that date. If all required Test Section(s) are not passed within this next rolling twenty-four (24) month period, credit for the second Test Section(s) passed shall expire and a new rolling twenty-four (24) month period will begin on the date the next Test Section passing score, if any, was released by NASBA to the Candidate or the Board, as the case may be, and this cycle of twenty-four (24) month rolling periods and Test Section credit expirations will continue until all Test Sections are passed within one twenty-four (24) month rolling period. Notwithstanding the foregoing, if a Candidate stops testing for a twenty-four (24) month period, then all credit for previously passed Test Sections will expire.**

(b) **A Candidate shall not retake a failed Test Section until the Candidate has been notified of the score for the most recent attempt of that failed Test Section.**

(c) **A Candidate shall be deemed to have passed the examination if the Candidate obtains credit for passing all required Test Sections in one rolling twenty-four (24) month period.**

(d) **A Candidate shall retain credit for any and all required Test Sections of the examination passed as a Candidate of another state if such credit would have been given under then applicable requirements in this State.**

(e) **Notwithstanding subsections (a), (b), and (c) of this Rule, the period of time in which to pass all required Test Sections of the examination may be extended by the Board upon a showing that the credit was lost by reason of individual hardship including, but not limited to, health; military service; a disruption at a local, regional, or national level impacting the Candidate; or other circumstances beyond the Candidate's control.**

This copy is for your personal, non-commercial use only. Distribution and use of this material are governed by our Subscriber Agreement and by copyright law. For non-personal use or to order multiple copies, please contact Dow Jones Reprints at 1-800-843-0008 or visit www.djreprints.com.

https://www.wsj.com/articles/accountants-have-to-go-to-college-for-five-years-minnesota-is-rethinking-that-cfd056b0

U.S.EDUCATION

Accountants Have to Go to College for Five Years. Some Are Rethinking That.

Accountant shortage prompts Minnesota and other states to consider alternative paths to becoming a licensed CPA

PricewaterhouseCoopers and Saint Peter's University are testing a pilot program that substitutes a year of work for the traditional fifth year of college coursework.

PHOTO: RICHARD B. LEVINE/LEVINE ROBERTS/ZUMA PRESS

By Lindsay Ellis Follow

March 6, 2023 at 8:00 am ET

Accounting, a profession focused on numbers, is vexed by this one: the 150 college credit hours required to become a certified public accountant.

The shortage of accountants in the U.S. has firms boosting salaries and sending work abroad. The cost of accounting work has been rising and some firms are turning away audit work because they can't find enough CPAs. Efforts to recruit more students into the field have become a near-constant conversation now nationwide among CPAs and industry groups.

One sticking point, some in the profession say, is the fact that would-be CPAs need to attend college for five years to amass the 150 hours of college credit required to get their license. That high standard gained traction in the 1990s as states boosted education requirements from a traditional 120-hour, four-year bachelor's degree. Some in the industry say the extra time in school and the expense are keeping students from entering the field. Accounting or financial courses aren't required during the fifth year, and many students take unrelated classes, from liberal-arts electives to earning a minor, accountants say.

For that reason, legislators in Minnesota are considering bills that would reduce credit hours needed for getting a CPA license. The move has sparked debate among national CPA groups that say states need to meet the national standard for accountants to be able to service clients around the U.S., and others who say the profession needs to be more flexible. In addition to schooling, CPA licenses require work experience and passing a test.

"We don't have enough students coming in. We have to be able to solve that problem," said Robert Cedergren, incoming board chair at the Minnesota Society of Certified Public Accountants. His group helped draft the legislation, introduced by a bipartisan group of lawmakers last month.

The bills, which are in committee in the state Senate and House of Representatives, seek to allow graduates to

skip the fifth year. Instead, four-year degree holders could take one of two paths: get two years of professional experience and take the CPA exam or get one year of work experience, take 120 hours of professional-education courses, and take the CPA test. (They could also complete the current path of 150 hours of college credit.)

The bills face staunch opposition from national industry groups, including the Association of International Certified Professional Accountants, a trade organization. The group says that adjusting the requirements would mean CPAs licensed in Minnesota couldn't practice outside the state. Big accounting firms, some industry groups say, need accountants who can practice nationally because they have clients from coast to coast.

Support for the 150-hour rule grew in the 1980s and means CPAs are better prepared to enter the field when they graduate, said Susan Coffey, chief executive of public accounting for AICPA.

"It's clearly a hurdle of entry into our profession, but it's a purposeful hurdle," Ms. Coffey said.

Many practicing accountants who graduated decades ago have four-year degrees, not five-year degrees, and do quality work, said David Knoble, the incoming chair of the South Carolina Association of CPAs.

In addition to Minnesota, three other states have alternatives to the 150-hour requirement or are looking to change their rules.

Ohio law has for decades allowed CPAs to get licensed without 150 hours, said Scott Wiley, president and chief executive of the Ohio Society of CPAs. In Ohio, people can obtain a license with 120 hours of college credits, four years of work experience, a score of 670 or higher on the Graduate Management Admission Test and passing the CPA exam, he said, and Ohio accountants have had no barriers to practicing nationally.

A South Carolina task force is evaluating whether the state could approve CPAs from other places to practice locally, even if those accountants have fewer than 150 college credit hours. In New Jersey, a pilot program is under way that substitutes a year's work for the traditional fifth year of course work; students would earn college credit hours on the job.

Saint Peter's University, based in Jersey City, N.J., and PricewaterhouseCoopers LLP are testing that program. The company is covering students' tuition for 30 credit hours at Saint Peter's while they work for the accounting firm.

The extra year of university is pushing Triston McKay, 21 years old, away from accounting and toward computer science classes at Salem University in West Virginia. He is wary of the costs of a fifth year of school and says that in recent years jobs in the tech sector have paid more than accounting.

"It's not a burden I would like to put on my parents," he said of an extra year of tuition and fees.

Write to Lindsay Ellis at lindsay.ellis@wsj.com

Appeared in the March 7, 2023, print edition as 'State Weighs New CPA Paths'.

Video can be found here

How lowering the accounting education requirement risks CPA mobility

Feb 26, 2023 · 59 min watch

How lowering the accounting education requirement risks CPA mobility

A proposed bill in Minnesota will upend firm mobility and complicate the path to licensure for students.

To become a licensed CPA in the United States, candidates must earn a bachelor's degree with 150 credit hours, gain one year of professional experience, and pass a national examination. This universal pathway is accepted by all 55 jurisdictions, allowing CPAs to easily perform services across state lines, whether virtually or in person. This uniformity also assures the public that regardless of where CPAs practice, they will uphold the highest professional and ethical standards.

The Minnesota Society of CPAs recently advanced a bill that would allow candidates to meet the education requirement through two alternative options: 1) earning 120 hours and two years of experience; or 2) obtaining 120 hours of college education, one year of experience, and 120 hours of continuing professional education (CPE) within one year of applying for a license. While the Society's decision was largely driven by the good intention of improving the profession's shrinking pipeline, **reducing the education requirement does not mean that students will rush to sit for the CPA exam and work toward a CPA license, or be more interested in working in the areas of audit and assurance.**

What the bill will do immediately upon passage, however, is upend mobility for CPAs and firms licensed in Minnesota, create unnecessary burdens for cross-state practice and careers, and complicate regulatory oversight. Students may also choose to earn their initial license in a neighboring state, where career opportunities won't be limited by inconsistent and confusing regulations.

Like the state CPA societies, the AICPA is laser-focused on attracting and retaining talent. We firmly believe the solution should not open up risks to CPA licensure. The profession's pipeline is driven by a number of complex factors—including an overall decline in college enrollment, rising education costs, and shifting expectations regarding work culture and starting salaries.

Any solutions must maintain the rigor needed to protect the public while providing flexibility for candidates of all backgrounds. Instead of opening doors for accounting students and CPAs, the Minnesota bill will quite literally close them.

The AICPA and National Association of State Boards of Accountancy (NASBA) hosted a webinar in mid-February to explain the bill's consequences and answer questions from stakeholders. Watch the video to understand what's at stake:

- **Loss of mobility:** Minnesota CPAs would no longer be able to practice in another state without first having their qualifications reassessed, and in most cases, applying for a new license.
- **Client limitations:** Minnesota public accounting firms would need to provide advance notice and gain a practice permit before signing any client engagement agreement or providing services.
- **Unexpected fees:** Minnesota CPAs and firms would incur expenses related to license applications, meeting CPE requirements, and additional administrative work.

Students and CPAs are encouraged to fill out this quick survey, which will help inform the AICPA's advocacy work and pipeline initiatives.

This site uses cookies to store information on your computer. Some are essential to make our site work; others help us improve the user experience. By using the site, you consent to the placement of these cookies. Read our privacy policy (/info/privacy-policy.html) to learn more.

Journal of Accountancy

NASBA upholds 150-hour education requirement for CPA licensure

By Bryan Strickland
February 10, 2023

Editor's note: Following NASBA's reaffirmation of its support for the 150-hour education requirement for CPA licensure, the JofA interviewed NASBA President and CEO Ken Bishop for NASBA's view of the issue.

Across the board, stakeholders charged with promoting and protecting the accounting profession are searching for solutions to a talent acquisition issue that isn't unique to the profession.

What is unique to the profession, however, is a licensing model that empowers CPAs to work in nearly every state — in person or virtually — without having to obtain additional credentials in other states.

The requirement for 150 credit hours for CPA licensure prescribed by the Uniform Accountancy Act (UAA) forms the foundation of the licensing model. The Board of Directors of the National Association of State Boards of Accountancy (NASBA), the national body for state boards of accountancy, recently reaffirmed its support of the standard by a unanimous vote.

"Should any state or jurisdiction lower the licensure requirement to 120 hours, their CPAs would no longer be automatically substantially equivalent and would no longer enjoy the mobility and reciprocal practice privileges they currently are afforded," NASBA President and CEO Ken Bishop said in an interview with the *JofA*. "Lowering the bar to 120 hours is only one of the alternatives we have heard that has been discussed and considered. Others, including lowering the cut score for passing the CPA Exam, have the potential and risk of creating the perception of dumbing down the profession. No one is talking about, for example, lowering the bar to become an attorney, and they're also suffering from lack of entry."

Bishop said the NASBA board vote was prompted by "a few state society staff members but not the profession in general" considering action that would create different pathways to CPA licensure. Bishop understands the sentiment behind the consideration but stressed that any changes on the state level that don't align with the UAA would be counterproductive for the profession.

"If I was a society CEO and I had some members who were having trouble hiring CPAs knocking on my door, I would be trying to react. We're not saying don't react; we're saying let's do it in a uniform way," Bishop said. "What really gets our attention is something that has an opportunity to disturb or completely adulterate the substantial equivalency, mobility, reciprocal licensure — things that we're working to protect and maintain.

"That doesn't mean that things won't change in the future. We're open to change, but it can't be state-specific or state-unilateral change, or we're in real trouble. We are reaching out to persuade states to not take any unilateral action that could damage both the public and the profession."

The NASBA legal team recently sent a letter (https://www.aicpa.org/resources/article/accounting-body-outlines-risks-of-reducing-educational-requirement) to the AICPA in response to an AICPA inquiry regarding a recent action taken by the Minnesota Society of CPAs. The Minnesota Society's board of directors approved the drafting and introduction of legislation to create an additional education and experience pathway to CPA licensure.

"If a new CPA candidate obtains their initial licensure in any state that has requirements that are less than the UAA, they're landlocked in that state," Bishop said. "It would be similar to Minnesota passing a law and their driver's license would only be good in the state of Minnesota. It would mean that people could not cross the state line into another state and have the same level of privilege that they have in Minnesota."

NASBA itself qualifies as a stakeholder struggling in the midst of what Bishop called the greatest pipeline disruption of his lifetime. The 16-year NASBA veteran and his staff are working tirelessly to come up with solutions that work for everyone in the profession.

"All professions are experiencing the same struggles," Bishop said. "Organizations such as state CPA societies are under tremendous pressure from firms to address this issue, and it has created some panic and a rush to find solutions. But we don't want to make shoot-from-the-hip decisions.

"NASBA and the AICPA are aggressively looking at options and alternatives that have the potential to increase the number of CPA candidates applying for licensure without disrupting substantial equivalency and practice privilege mobility."

— To comment on this article or to suggest an idea for another article, contact Bryan Strickland at Bryan.Strickland@aicpa-cima.com (mailto:Bryan.Strickland@aicpa-cima.com).

(https://future.aicpa.org/home)

© 2023 Association of International Certified Professional Accountants. All rights reserved.

This copy is for your personal, non-commercial use only. Distribution and use of this material are governed by our Subscriber Agreement and by copyright law. For non-personal use or to order multiple copies, please contact Dow Jones Reprints at 1-800-843-0008 or visit www.djreprints.com.

https://www.wsj.com/articles/why-so-many-accountants-are-quitting-11672236016

MANAGING YOUR CAREER

Why So Many Accountants Are Quitting

Even some accounting majors don't want accounting jobs

By Lindsay Ellis Follow

Dec. 28, 2022 9:00 am ET

More than 300,000 U.S. accountants and auditors have left their jobs in the past two years, a 17% decline, and the dwindling number of college students coming into the field can't fill the gap.

The exodus is driven by deeper workplace shifts than baby-boomer retirements. Young professionals in the 25- to 34-year-old range and midcareer professionals between the ages of 45 and 54 also departed in high numbers starting in 2019, according to the Bureau of Labor Statistics. Recruiters who have been luring experienced accountants into new roles say they are often moving into jobs in finance and technology.

The huge gap between companies that need accountants and trained professionals has led to salary bumps and more temporary workers joining the sector. Still, neither development will fix the fundamental talent pipeline problem: Many college students don't want to work in accounting. Even those who majored in it.

KPMG needs to recruit thousands of entry-level associates for fall 2023.

PHOTO: BILL MCCULLOUGH FOR THE WALL STREET JOURNAL

Jordan Pixley put his attention to detail and love of numbers into his Clemson University accounting classes. But in internships, he felt bogged down by the repetitive tasks of accounting—such as balancing cash sheets—and the work proved less interesting than the college class he enjoyed most—data analysis.

The 22-year-old accounting major attended a KPMG LLP recruiting event in Orlando, Fla., but ultimately chose not to apply. He graduated last week without a job lined up and is exploring opportunities with the U.S. military. Accounting's grueling hours—70- and 80-hour weeks are common at the biggest public firms before tax and audit deadlines—were part of the turnoff, he said.

"I was a little scared of it, not going to lie," Mr. Pixley said. "I don't know if I want to do all that."

KPMG said it is considering ways to reduce overtime hours and workloads during busy seasons. While salaries vary by market and position, most entry-level workers across audit, tax and advisory services at KPMG in 2023 will earn

salaries that are 5% to 15% higher than those who graduated and joined in 2022, the firm said. One entry-level tax associate job based in New York City, which requires firms to disclose pay, has a posted range of between $71,000 and $82,000.

In the past 12 months, most KPMG employees have received three successive pay increases, a company spokeswoman said. Chief Executive Paul Knopp spent several days this fall on college campuses, including the University of Texas at Austin and the University of Illinois, pitching the company and meeting with students. He said the profession hasn't done enough to help students understand the career options in accounting.

"The accounting degree is an incredible, powerful tool to help you succeed longer term in the business world," he said.

It isn't an easy sell, said Steven Kachelmeier, who leads UT-Austin's accounting department. As the number of accounting majors has dropped, the bidding war to recruit students has intensified.

Industry groups are trying to change the perception that accounting work is tedious with daunting hours.

PHOTO: BILL MCCULLOUGH FOR THE WALL STREET JOURNAL

Firms promise higher salaries after a few years on staff, Prof. Kachelmeier said, but "when you're 19 years old, you don't think about 10 years from now or even five years from now. You think about right now."

Students want to make more money up front than many accounting firms are paying—and they are finding it in other industries, according to professors. The expanded opportunities have come during a decadelong economic boom that has created new roles in sectors from banking to tech. Top students straight out of college can make significantly more going to work for consulting outfits and banks, rival fields that are drawing quantitatively minded students, according to recruiters.

"I don't know who we're not competing with, quite honestly," said Rod Adams, who leads PricewaterhouseCoopers LLP's hiring in the U.S. and Mexico.

The firm, which needs to recruit 4,200 entry-level associates for fall 2023, has prospects in its hiring pipeline as early as their sophomore years. Students do an internship after their sophomore year, and many of those interns are funneled into a second internship after their junior year, Mr. Adams said. Many go on to receive full-time offers.

One significant barrier to entry remains for many newly minted accounting graduates. To earn a certified public accountant license, a professional needs 150 credit hours, or 30 college credits beyond the typical 120-hour bachelor's degree requirement. The 10 extra classes can add up to a fifth year of college, which can cost tens of thousands of dollars in additional tuition and fees.

PwC has joined with Saint Peter's University, based in Jersey City, N.J., so that some students can get the 30 extra college credits by working at the firm. The company is paying tuition and paying the students for the year of work. Company leadership hopes the pilot project that allows work for credit will result in more young professionals sticking with accounting and becoming full-fledged CPAs.

The number of U.S. students who completed a bachelor's degree in accounting declined nearly 9% to about 52,500 in 2020, down from almost 57,500 in 2012, according to the Association of International Certified Professional Accountants. The slump has continued over the past two years, according to the group, though it hasn't published final numbers for 2021 and 2022. Fewer students are also sitting for the four-part examination to become a CPA.

While some mathematically inclined students are drawn to accounting, the field still suffers from a stigma that it is uncool, with tedious work and daunting hours, said Keith Wolf, managing director at the Houston-based recruiting firm Murray Resources. Companies are sending young professionals into high-school classrooms to try to change that perception, and an industry group has drawn millions of views with a TikTok campaign to show the field in a fresh light.

Accounting is a reliable path to stable, steady work, Mr. Wolf said, but there are easier ways to enter the business world.

"There's so many options," he said. "Why pursue a much more difficult path?"

Write to Lindsay Ellis at lindsay.ellis@wsj.com

Corrections & Amplifications

The CPA license refers to certified public accountant. An earlier version of this story incorrectly described it as the certified professional accountant license. (Corrected on Dec. 28)

Appeared in the December 29, 2022, print edition as 'Many Accountants Call It Quits'.

VIRGINIA BOARD OF ACCOUNTANCY

Education Handbook

DRAFT

This handbook includes education requirements to take the CPA exam and requirements needed for licensure as a CPA in Virginia.

This revised Education Handbook is effective as of January 2024. Candidates can apply under the revised requirements or the prior education requirements up until June 30, 2025.

Effective: January 2011
Revised: March 2023

TABLE OF CONTENTS

CPA EXAM 1

Education requirements 1

Core accounting courses 1

Academic credit alternatives 2

Accredited institutions 3

Non-accredited institutions 3

Combined education from accredited and non-accredited institutions 3

International education 4

Determining education qualifications 4

Documentation requirements (transcripts) 4

CPA LICENSE 5

Licensure requirements 5

CONTACT US 6

ATTACHMENTS

Education Self-Evaluation Worksheet 7

CPA exam application steps 10

Graduate Study Recommendation 11

DRAFT

CPA EXAM

EDUCATION REQUIREMENTS

The following requirements must be met to be eligible to take the CPA exam in Virginia.

Exam candidates must obtain from one or more accredited institutions:

- At least 120 semester hour credits of college education
- Baccalaureate or higher degree with an accounting concentration or equivalent

An accounting concentration or equivalent is comprised of:

- 24 semester hours of accounting courses: including courses in accounting information systems, auditing, financial accounting, and taxation (referred to as Core Accounting Courses)
- 24 semester hours of business courses: no more than six semester hours of VBOA accepted upper-level accounting courses can be included (must be in addition to the 24 semester hours of accounting courses above)

Note 1: No more than 3 semester hours of introductory/foundational accounting as determined by the VBOA is allowed toward the required accounting coursework. The course number or name does not always dictate whether a course is considered an introductory or foundational accounting course.

Note 2: Anyone who holds a bachelor's degree as well as a master's or more advanced degree in accounting, tax or accounting information systems from an accredited college or university or the equivalent thereof, will be deemed eligible to sit for the exam. 150 semester hours are required for ultimate licensure.

Note 3: The VBOA accepts courses for which quarter hours are earned. The semester hour equivalent can be calculated by dividing the total number of quarter hours by 1.5.

DRAFT

Core Accounting Courses

Subjects
• Accounting Information Systems • Auditing • Financial Accounting • Taxation

Examples of other accounting courses accepted toward the accounting requirement include, but are not limited to:

- Accounting Analytics
- Accounting Internship
- Accounting Seminar
- Accounting Theory
- Advanced Accounting
- Assurance Services
- Cost/Managerial Accounting
- Federal Taxation
- Forensic Accounting
- Fund Accounting
- Government Accounting and Reporting
- Government/Not-For-Profit Accounting
- Information Systems Assurance and Advisory
- Other accounting-centric courses with content areas included in the Uniform CPA Examination Blueprint as approved by the VBOA

Examples of courses accepted toward the business requirement in the subjects of Business Information Technology, Economics, Finance, Management, Marketing, and Statistics include, but are not limited to:

- Business Communications
- Business Law
- Commercial Law
- Data Analytics
- Financial Management
- Information Systems or Technology
- Insurance
- Investments
- Legal Environment of Business
- Organizational Behavior
- Quantitative Methods
- Other business-centric courses with content areas included in the Uniform CPA Examination Blueprint as approved by the VBOA

As previously stated, no more than six semester hours of VBOA accepted upper-level accounting courses can be considered business courses (must be in addition to the 24 semester hours of accounting courses above).

DRAFT

ACADEMIC CREDIT ALTERNATIVES

The VBOA accepts credits awarded for internships and courses taken pass/fail provided that the associated course(s) are reflected on the transcript as earned credit from an accredited U.S. institution.

The VBOA does not accept the following for credit:

- Examination or experience alternatives not recognized by an accredited U.S. institution as academic credit
- Courses taken on an audit basis, not for academic credit
- Continuing education courses not granted academic credit
- Duplicate courses (i.e., credit is awarded only once for a course)
- Coursework deemed by the college to be remedial or below college level

ACCREDITED INSTITUTIONS

The VBOA recognizes institutions accredited by one of the following accrediting agencies (or their successors):

- Middle States Association of Colleges and Schools: https://www.msa-cess.org/
- New England Commission of Higher Education: https://www.neche.org/
- Higher Learning Commission: http://www.hlcommission.org
- Northwest Commission on Colleges and Universities: www.nwccu.org
- Southern Association of Colleges and Schools: www.sacscoc.org
- WASC Senior College and University Commission: www.acswasc.org
- Any organization recognized by the Council for Higher Education Accreditation (CHEA): www.chea.org

If an accrediting organization is not listed above, it may be approved by the VBOA after it demonstrates that its accreditation process and standards are substantially equivalent to the accreditation process and standards of the above major regional accrediting organizations.

The accrediting agency websites should list the accredited institutions. Contact the institution directly to determine if it is accredited through one of the recognized accrediting agencies. Many institutions list the accreditation on the back of their transcripts.

DRAFT

NON-ACCREDITED INSTITUTIONS

The VBOA can approve a degree or coursework earned at a non-accredited institution if the degree or coursework is evaluated by an education evaluation firm and deemed equivalent to Virginia education requirements.

Additional information on approved education evaluation firms approved by the VBOA, as well as documentation requirements, may be found on the VBOA website at https://boa.virginia.gov/cpa-exam/requirements/education-evaluation-firms.

COMBINED EDUCATION FROM ACCREDITED AND NON-ACCREDITED INSTITUTIONS

If the degree awarded by an accredited institution includes credits for courses taken at a non-accredited or international institution, those credits must be:

- Included for academic credit on the official transcript from the accredited institution where the degree was awarded

  or

- Evaluated for academic credit by one of the education evaluation firms approved by the VBOA

An accrediting organization may be approved by the VBOA after it demonstrates its accreditation process and standards are substantially equivalent to the accreditation process and standards of the major regional accrediting organizations.

INTERNATIONAL EDUCATION

Before the VBOA considers a degree or coursework earned outside the U.S., the individual must have the degree or coursework evaluated by an education evaluation firm approved by the VBOA to determine equivalency with Virginia education requirements.

DETERMINING EDUCATION QUALIFICATIONS

The VBOA has developed the Education Self-Evaluation Worksheet to assist candidates in evaluating ~~if~~ the education requirements needed to qualify for the CPA exam.

The Education Self-Evaluation Worksheet is attached to this handbook on page 7.

DOCUMENTATION REQUIREMENTS (TRANSCRIPTS)

When applying to take the CPA exam, candidates must provide documentation of education qualifications to the VBOA in the form of:

- Official transcripts from each institution where the candidate earned credit hours toward the educational requirements

  and/or

- An original copy of the education evaluation report from an approved VBOA education evaluation firm, if applicable

For complete information on the CPA exam process, visit the VBOA website at https://boa.virginia.gov/cpa-exam/apply/exam-application-steps. The Exam Application Steps are attached to this handbook on page 10.

DRAFT

CPA LICENSE

LICENSURE REQUIREMENTS

In order to become a licensed CPA in Virginia, an applicant must meet the 3 Es: education, exam and experience.

Education
An applicant seeking licensure must provide documentation from one or more accredited institutions:

- At least 150 semester hour credits of college education
- A baccalaureate or higher degree with an accounting concentration or equivalent

The VBOA recommends applicants incorporate at least some graduate-level study of accounting in meeting the 150 semester hour requirement.

Although 150 semester hours of education are required to be licensed as a CPA in Virginia, 120 semester hours and an accounting concentration or the equivalent are the minimum requirements for an exam candidate to sit for any part of the CPA exam.

Exam
An applicant must pass the CPA exam with a score of 75 or higher on each section, within an 18-month period, prior to applying for licensure.

Experience
During the licensure application process, applicants are required to complete an Experience Verification Form. The experience must be verified by an actively licensed CPA from any jurisdiction.

According to § 54.1-4400 of the Code of Virginia, the VBOA defines experience as an applicant being employed in academia, a firm, government, or industry in any capacity involving the substantial use of accounting, financial, tax or other skills that are relevant, as determined by the VBOA, to provide services to or on behalf of an employer or to the public as verified by an active, licensed CPA.

VBOA regulation 18VAC5-22-100 requires that, prior to applying for a license, a person must have been employed in academia, a firm, government, or industry in any capacity involving the substantial use of accounting, financial, tax, or other skills that are relevant, as determined by the board, to providing services to the public or to or on behalf of an employer for a period that is the full-time equivalent of one year. Whether other skills are relevant shall be determined by the board on a case-by-case basis. Self-employment does not meet this definition of experience.

Note: The applicant must complete at least 2,080 work hours or equivalent to one year of full-time employment. Whether other skills are relevant shall be determined by the VBOA on a case-by-case basis.

DRAFT

If a candidate applies for licensure in Virginia, has passed the CPA exam in a state other than Virginia and that state is considered substantially equivalent as defined in Code of Virginia § 54.1-4411, and obtained a minimum of 150 hours from one or more appropriately accredited institution(s), the VBOA's accounting concentration or equivalent requirement will be considered satisfied. Official transcripts and/or education evaluation will still need to be sent to verify the completion of the 150-hour requirement.

CONTACT US

Virginia Board of Accountancy
9960 Mayland Drive, Suite 402
Henrico, Virginia 23233
Email: boa@boa.virginia.gov
Phone: (804) 367-8505
CPA examination services: (804) 367-1111
Fax: (804) 527-4409
Fax (enforcement/complaints): (804) 527-4207

Enforcement Division
Email: enforcement@boa.virginia.gov
Fax (enforcement/complaints): (804) 527-4207

Continuing professional education (CPE)
Email: cpe@boa.virginia.gov
Phone: (804) 482-8757

DRAFT

ATTACHMENTS

- Education Self-Evaluation Worksheet
- CPA Exam Application Steps
- Graduate Study Recommendation

EDUCATION SELF-EVALUATION WORKSHEET

The Virginia Board of Accountancy (VBOA) has developed a resource to assist candidates in evaluating the education requirements needed to qualify for the CPA exam. The VBOA makes the final determination as to whether an exam candidate meets the education requirements.

Note: An education evaluation firm approved by the VBOA must evaluate a degree or coursework earned from non-accredited or international institutions to determine equivalency with Virginia education requirements.

Exam candidates must obtain from one or more accredited institutions:

- At least 120 semester hours of education
- Baccalaureate or higher degree with an accounting concentration or equivalent: No more than 3 semester hours of what can be considered introductory/foundational accounting is allowed toward the required accounting coursework of 24 semester hours.

The VBOA accepts courses for which quarter hours are earned. The semester hour equivalent can be calculated by dividing the total number of quarter hours by 1.5.

DRAFT

Accounting courses

On a separate line, enter each course you completed and the associated academic credits received. The course number or name does not always dictate whether a course is considered an introductory or foundational accounting course. Contact the VBOA with any questions you may have.

Use the accounting course examples as a reference as you fill out your own worksheet.

Core Accounting Courses

Subjects
• Accounting Information Systems • Auditing • Financial Accounting • Taxation

Examples of other accounting courses accepted toward the accounting requirement include, but are not limited to:

- Accounting Analytics
- Accounting Internship
- Accounting Seminar
- Accounting Theory
- Advanced Accounting
- Assurance Services
- Cost/Managerial Accounting
- Federal Taxation
- Forensic Accounting
- Fund Accounting
- Government Accounting and Reporting
- Government/Not-For-Profit Accounting
- Information Systems Assurance and Advisory
- Other accounting-centric courses with content areas included in the Uniform CPA Examination Blueprint as approved by the VBOA

Accounting Course Worksheet

Institution	Accounting course/title	Semester hours
	Accounting Information Systems*:	
	Auditing*:	
	Financial Accounting*:	
	Taxation*:	
	Total semester hours:	

*Required courses

DRAFT

Business courses

On a separate line below, enter each course you completed and the associated academic credits received. No more than 6 semester hours of VBOA accepted upper-level accounting courses can be considered relevant business courses (must be in addition to the 24 semester hours of accounting courses).

Examples of courses accepted toward the business requirement in the subjects of Business Information Technology, Economics, Finance, Management, Marketing, and Statistics include, but are not limited to:

- Business Communications
- Business Law
- Commercial Law
- Data Analytics
- Financial Management
- Information Systems or Technology
- Insurance
- Investments
- Legal Environment of Business
- Organizational Behavior
- Quantitative Methods
- Other business-centric courses with content areas included in the Uniform CPA Examination Blueprint as approved by the VBOA

DRAFT

Business Course Worksheet

Institution	Business course/title	Semester hours
	Total semester hours:	

CPA EXAM APPLICATION STEPS

The CPA examination process is a partnership between the American Institute of CPAs (AICPA), National Association of State Boards of Accountancy (NASBA) and Prometric. Review the process for step-by-step instructions on applying for the CPA exam.

1. Register, create a user ID and password, and login to submit the initial application. The initial non-refundable application fee is $120.

2. After submitting the application, send official transcripts to the Virginia Board of Accountancy at 9960 Mayland Drive, Suite 402, Henrico, VA 23233.

3. Processing takes approximately **two to three weeks** from the date transcripts are received. Once processing is complete, a determination of eligibility will be sent via email.

4. After being deemed eligible, exam candidates will receive the first payment coupon in the online NASBA Candidate portal within three to five business days. Exam candidates must login to their NASBA account to view the payment coupon. The payment coupon is valid for six months.

5. Once the payment coupon has been submitted, the exam candidate can view the Notice to Schedule (NTS) via the NASBA Candidate portal. The NTS is valid for 12 months.

6. Upon accessing the NTS, the exam candidate will contact a Prometric Testing Facility to schedule the date to sit for the exam section. Visit the Prometric website and the online seat availability tool. It allows candidates to view seat availability for exam sections based on a preferred location without having a section ID.

DRAFT

GRADUATE STUDY RECOMMENDATION

Adopted October 24, 2008

One of the Virginia Board of Accountancy's (VBOA) responsibilities is to establish minimum levels of education required to become licensed CPAs and to protect the public interest. Most states, including Virginia, now require a minimum of 150 semester hours of education and also specify a minimum number of semester hours in accounting courses and in business courses. The goal of these requirements is to assure an adequate depth of knowledge in accounting and business as well as adequate breadth in general education.

Some students may be able to meet all of these requirements via an intensive study of accounting and business during their undergraduate study. Others may pursue both undergraduate and graduate study in accounting. Still others may focus much of their study of accounting and business at the graduate level, having pursued an undergraduate major other than accounting. All of these strategies can fulfill the minimum educational requirements to become a licensed CPA.

The VBOA encourages students preparing to become licensed CPAs to elect courses wisely in meeting the requirement of 150 semester hours of education, such as courses that provide knowledge, skills and abilities that can assist them to become better accounting professionals. They should incorporate some graduate level study of accounting into their educational plans. The VBOA believes that the increased rigor and the strategic focus of graduate level courses can be valuable in preparing future accounting professionals to meet the increasing demands of the marketplace and to excel in the practice of public accounting.

The VBOA offers this recommendation as the shared opinion of its members, not as an official VBOA position. The formal educational requirements for licensure are specified in the Virginia accountancy statutes and in the related regulations, which can be found on the VBOA's website at www.boa.virginia.gov.

The VBOA encourages students preparing to become licensed CPAs to stay updated about developments by reviewing the VBOA website regularly.

Note: As of March 2023, the VBOA continues to support the above recommendation. However, we acknowledge that, since its adoption date, all states require a minimum of 150 semester hours of education and an accounting concentration or equivalent and, as a result, are deemed substantially equivalent.

DRAFT

VIRGINIA BOARD OF ACCOUNTANCY

Education Handbook

This handbook includes education requirements to take the CPA exam and requirements needed for licensure as a CPA in Virginia.

This revised Education Handbook is effective as of January 2024. Candidates can apply under the revised requirements or the prior education requirements up until June 30, 2025.

Effective: January 2011

Revised: March 2023

TABLE OF CONTENTS

CPA EXAM 1

Education requirements 1

Core accounting courses 1

Academic credit alternatives 2

Accredited institutions 3

Non-accredited institutions 3

Combined education from accredited and non-accredited institutions 3

International education 4

Determining education qualifications 4

Documentation requirements (transcripts) 4

CPA LICENSE 5

Licensure requirements 5

CONTACT US 6

ATTACHMENTS

Education Self-Evaluation Worksheet 7

CPA exam application steps 10

Graduate Study Recommendation 11

CPA EXAM

EDUCATION REQUIREMENTS

The following requirements must be met to be eligible to take the CPA exam in Virginia.

Exam candidates must obtain from one or more accredited institutions:

- At least 120 semester hour credits of college education
- Baccalaureate or higher degree with an accounting concentration or equivalent

An accounting concentration or equivalent is comprised of:

- 24 semester hours of accounting courses: including courses in accounting information systems, auditing, financial accounting, and taxation (referred to as Core Accounting Courses)
- 24 semester hours of business courses: no more than six semester hours of ~~what could be considered~~ VBOA accepted upper-level accounting courses can be included (must be in addition to the 24 semester hours of accounting courses above)

Note 1: No more than 3 semester hours of ~~what can be considered~~ introductory/foundational accounting as determined by the VBOA is allowed toward the required accounting coursework. The course number or name does not always dictate whether a course is considered an introductory or foundational accounting course.

Note 2: Anyone who holds a bachelor's degree ~~in accounting or an accepted business-related major~~ as well as a master's or more advanced degree in accounting, tax or accounting information systems from an accredited college or university or the equivalent thereof, will be deemed eligible to sit for the exam. ~~The~~ 150 semester hours are ~~still~~ required for ultimate licensure.

Note 3: The VBOA accepts courses for which quarter hours are earned. The semester hour equivalent can be calculated by dividing the total number of quarter hours by 1.5.

Core Accounting Courses

Subjects
• Accounting Information Systems
• Auditing
• Financial Accounting~~: Courses that meet this requirement include, but are not limited to: Intermediate Accounting I, II and III, and Financial Statement Analysis~~
• Taxation

Examples of other accounting courses accepted toward the accounting requirement include, but are not limited to:

- Accounting Analytics
- Accounting Internship
- Accounting Seminar
- Accounting Theory
- Advanced Accounting
- Assurance Services
- Cost/Managerial Accounting
- Federal Taxation
- Forensic Accounting
- Fund Accounting
- Government Accounting and Reporting
- Government/Not-For-Profit Accounting
- Information Systems Assurance and Advisory
- Other accounting-centric courses with content areas included in the Uniform CPA Examination Blueprint as approved by the VBOA

Examples of courses accepted toward the business requirement in the subjects of Business Information Technology, Economics, Finance, Management, Marketing, and Statistics include, but are not limited to:

- Business Communications
- Business Law
- Commercial Law
- Data Analytics
- Financial Management
- Information Systems or Technology
- Insurance
- Investments
- Legal Environment of Business
- Organizational Behavior
- ~~Personal Financial Planning~~
- Quantitative Methods
- Other business-centric courses with content areas included in the Uniform CPA Examination Blueprint as approved by the VBOA

~~No more than six semester hours of accepted accounting course work, can be considered business courses toward meeting the 48 minimum number of semester hours required for an accounting concentration or equivalent.~~

As previously stated, no more than six semester hours of VBOA accepted upper-level accounting courses can be considered business courses (must be in addition to the 24 semester hours of accounting courses above).

ACADEMIC CREDIT ALTERNATIVES

The ~~Virginia Board of Accountancy~~ VBOA accepts credits awarded for internships and courses taken pass/fail ~~courses~~ provided ~~the internship or course is awarded academic credit~~ that the associated course(s) are reflected on the transcript as earned credit from an accredited U.S. institution.

The VBOA does not accept the following for credit:

- Examination or experience alternatives not recognized by an accredited U.S. institution as academic credit
- Courses taken on an audit basis, not for academic credit
- Continuing education courses not granted academic credit
- Duplicate courses (i.e., credit is awarded only once for a course)
- Coursework deemed by the college to be remedial or below college level

ACCREDITED INSTITUTIONS

The VBOA recognizes institutions accredited by one of the following accrediting agencies (or their successors):

- Middle States Association of Colleges and Schools: https://www.msa-cess.org/
- New England ~~Association of Schools and Colleges~~ Commission of Higher Education: https://www.neche.org/
- ~~The~~ Higher Learning Commission: http://www.hlcommission.org
- Northwest Commission on Colleges and Universities: www.nwccu.org
- Southern Association of Colleges and Schools: www.sacscoc.org
- ~~Western Association of Schools and Colleges~~ WASC Senior College and University Commission: www.acswasc.org
- Any organization recognized by the Council for Higher Education Accreditation (CHEA): www.chea.org

If an accrediting organization is not listed above, it may be approved by the VBOA after it demonstrates that its accreditation process and standards are substantially equivalent to the accreditation process and standards of the above major regional accrediting organizations.

The accrediting agency websites should list the accredited institutions. Contact the institution directly to determine if it is accredited through one of the recognized accrediting agencies. Many institutions ~~do~~ list the accreditation on the back of their transcripts.

NON-ACCREDITED INSTITUTIONS

The VBOA can approve a degree or coursework earned at a non-accredited institution if the degree or coursework is evaluated by an education evaluation firm and ~~determined~~ deemed equivalent to ~~with~~ Virginia education requirements.

Additional information on approved education evaluation firms approved by the VBOA, as well as documentation requirements, may be found on the VBOA website at https://boa.virginia.gov/cpa-exam/requirements/education-evaluation-firms.

COMBINED EDUCATION FROM ACCREDITED AND NON-ACCREDITED INSTITUTIONS

If the degree awarded by an accredited institution includes credits for courses taken at a non-accredited or international institution, those credits must be:

- Included for academic credit on the official transcript from the accredited institution where the degree was awarded

  or

- Evaluated for academic credit by one of the education evaluation firms approved by the VBOA

An accrediting organization may be approved by the VBOA after it demonstrates its accreditation process and standards are substantially equivalent to the accreditation process and standards of the major regional accrediting organizations.

INTERNATIONAL EDUCATION

Before the VBOA considers a degree or coursework earned outside the U.S., the individual must have the degree or coursework evaluated by an education evaluation firm approved by the VBOA to determine equivalency with Virginia education requirements.

DETERMINING EDUCATION QUALIFICATIONS

The VBOA has developed the Education Self-Evaluation Worksheet to assist candidates in evaluating ~~if~~ the education requirements needed to qualify for the CPA exam ~~are being met~~.

The Education Self-Evaluation Worksheet is attached to this handbook on page 7.

DOCUMENTATION REQUIREMENTS (TRANSCRIPTS)

When applying to take the CPA exam, candidates must provide documentation of education qualifications to the VBOA in the form of:

- Official transcripts from each institution where the candidate earned credit hours toward the educational requirements

  and/or

- An original copy of the education evaluation report from an approved VBOA education evaluation firm, if applicable

For complete information on the CPA exam process, visit the VBOA website at https://boa.virginia.gov/cpa-exam/apply/exam-application-steps. The Exam Application Steps are attached to this handbook on page 10.

CPA LICENSE

LICENSURE REQUIREMENTS

In order to become a licensed CPA in Virginia, an applicant must meet the 3 Es: education, exam and experience.

Education
An applicant seeking licensure must provide documentation from one or more accredited institutions:

- At least 150 semester hour credits of college education
- A baccalaureate or higher degree with an accounting concentration or equivalent

The VBOA recommends applicants incorporate at least some graduate-level study of accounting in meeting the 150 semester hour requirement.

Although 150 semester hours of education are required to be licensed as a CPA in Virginia, 120 semester hours and an accounting concentration or the equivalent ~~is~~ are the minimum ~~hours required~~ requirements for an exam candidate to sit for any part of the CPA exam.

Exam
An applicant must pass the CPA exam with a score of 75 or higher on each section, within an 18-month period, prior to applying for licensure.

Experience
During the licensure application process, applicants are required to complete an Experience Verification Form. The experience must be verified by an actively licensed CPA from any jurisdiction.

According to § 54.1-4400 of the Code of Virginia, the VBOA defines experience as an applicant being employed in academia, a firm, government, or industry in any capacity involving the substantial use of accounting, financial, tax or other skills that are relevant, as determined by the VBOA, to provide services to or on behalf of an employer or to the public as verified by an active, licensed CPA. ~~The applicant must complete at least 2,080 work hours, or equivalent to one year of full-time employment. Whether other skills are relevant shall be determined by the VBOA on a case-by-case basis. Self-employment does not meet the definition of prior experience.~~

VBOA regulation 18VAC5-22-100 requires that, prior to applying for a license, a person must have been employed in academia, a firm, government, or industry in any capacity involving the substantial use of accounting, financial, tax, or other skills that are relevant, as determined by the board, to providing services to the public or to or on behalf of an employer for a period that is the full-time equivalent of one year. Whether other skills are relevant shall be determined by the board on a case-by-case basis. Self-employment does not meet this definition of experience.

Note: The applicant must complete at least 2,080 work hours or equivalent to one year of full-time employment. Whether other skills are relevant shall be determined by the VBOA on a case-by-case basis.

If a candidate applies for licensure in Virginia, has passed the CPA exam in a state other than Virginia and that state is considered substantially equivalent as defined in Code of Virginia § 54.1-4411, and obtained a minimum of 150 hours from one or more appropriately accredited institution(s), the VBOA's accounting concentration or equivalent requirement will be considered satisfied. Official transcripts and/or education evaluation will still need to be sent to verify the completion of the 150-hour requirement.

CONTACT US

Virginia Board of Accountancy
9960 Mayland Drive, Suite 402
Henrico, Virginia 23233
Email: boa@boa.virginia.gov
Phone: (804) 367-8505
CPA examination services: (804) 367-1111
Fax: (804) 527-4409
Fax (enforcement/complaints): (804) 527-4207

Enforcement Division
Email: enforcement@boa.virginia.gov
Fax (enforcement/complaints): (804) 527-4207

Continuing professional education (CPE)
Email: cpe@boa.virginia.gov
Phone: (804) 482-8757

ATTACHMENTS

- Education Self-Evaluation Worksheet
- CPA Exam Application Steps
- Graduate Study Recommendation

EDUCATION SELF-EVALUATION WORKSHEET

The Virginia Board of Accountancy (VBOA) has developed a resource to assist candidates in evaluating the education requirements needed to qualify for the CPA exam. The VBOA makes the final determination as to whether an exam candidate meets the education requirements.

Note: An education evaluation firm approved by the VBOA must evaluate a degree or coursework earned from non-accredited or international institutions to determine equivalency with Virginia education requirements.

Exam candidates must obtain from one or more accredited institutions:

- At least 120 semester hours ~~(180 quarter hours)~~ of education
- Baccalaureate or higher degree with an accounting concentration or equivalent: No more than 3 semester hours of what can be considered introductory/foundational accounting is allowed toward the required accounting coursework of 24 semester hours.

The VBOA accepts courses for which quarter hours are earned. The semester hour equivalent can be calculated by dividing the total number of quarter hours by 1.5.

Accounting courses

On a separate line, enter each course you completed and the associated academic credits received. The course number or name does not always dictate whether a course is considered an introductory or foundational accounting course. Contact the VBOA with any questions you may have.

Use the accounting course examples as a reference as you fill out your own worksheet.

Core Accounting Courses

Subjects
• Accounting Information Systems • Auditing • Financial Accounting: ~~Courses that meet this requirement include, but are not limited to: Intermediate Accounting I, II and III, and Financial Statement Analysis~~ • Taxation

Examples of other accounting courses accepted toward the accounting requirement include, but are not limited to:

- Accounting Analytics
- Accounting Internship
- Accounting Seminar
- Accounting Theory
- Advanced Accounting
- Assurance Services
- Cost/Managerial Accounting
- Federal Taxation
- Forensic Accounting
- Fund Accounting
- Government Accounting and Reporting
- Government/Not-For-Profit Accounting
- Information Systems Assurance and Advisory
- Other accounting-centric courses with content areas included in the Uniform CPA Examination Blueprint as approved by the VBOA

Accounting Course Worksheet

Institution	Accounting course/title	Semester hours
	Accounting Information Systems*:	
	Auditing*:	
	Financial Accounting*:	
	Taxation*:	
	Total semester hours:	

*Required courses

~~**Quarter hour courses**~~

~~The VBOA accepts courses for which quarter hours are earned. The semester hour equivalent can be calculated by dividing the For courses earning quarter hours, divide the total number of quarter hours by 1.5 to determine the semester hour equivalent.~~

Business courses

On a separate line below, enter each course you completed and the associated academic credits received. No more than 6 semester hours of VBOA accepted upper-level accounting courses ~~(excluding introductory or foundational accounting courses) can be considered as relevant business courses.~~ can be considered relevant business courses (must be in addition to the 24 semester hours of accounting courses).

Examples of courses accepted toward the business requirement in the subjects of Business Information Technology, Economics, Finance, Management, Marketing, and Statistics include, but are not limited to:

- Business Communications
- Business Law
- Commercial Law
- Data Analytics
- Financial Management
- Information Systems or Technology
- Insurance
- Investments
- Legal Environment of Business
- Organizational Behavior
- ~~Personal Financial Planning~~
- Quantitative Methods
- Other business-centric courses with content areas included in the Uniform CPA Examination Blueprint as approved by the VBOA

~~No more than six semester hours of accepted accounting course work, can be considered business courses toward meeting the 48 minimum number of semester hours required for an accounting concentration or equivalent.~~

Business Course Worksheet

Institution	Business course/title	Semester hours
	Total semester hours:	

~~**Quarter hour courses**~~

~~For courses earning quarter hours, divide the total number of quarter hours by 1.5 to determine the semester hour equivalent.~~

CPA EXAM APPLICATION STEPS

The CPA examination process is a partnership between the American Institute of CPAs (AICPA), National Association of State Boards of Accountancy (NASBA) and Prometric. Review the process for step-by-step instructions on applying for the CPA exam.

1. Register, create a user ID and password, and login to submit the initial application. The initial non-refundable application fee is $120.

2. After submitting the application, send official transcripts to the Virginia Board of Accountancy at 9960 Mayland Drive, Suite 402, Henrico, VA 23233.

3. Processing takes approximately **two to three weeks** from the date transcripts are received. Once ~~the~~ processing is complete, a determination of eligibility will be sent via email.

4. After being deemed eligible, exam candidates will receive the first payment coupon in the online NASBA Candidate portal within three to five business days. Exam candidates must login to their NASBA account to view the payment coupon. The payment coupon is valid for six months.

5. Once the payment coupon has been submitted, the exam candidate can view the Notice to Schedule (NTS) via the NASBA Candidate portal. The NTS is valid for 12 months.

6. Upon accessing the NTS, the exam candidate will contact a Prometric Testing Facility to schedule the date to sit for the exam section. Visit the Prometric website and the online seat availability tool. It allows candidates to view seat availability for exam sections based on a preferred location without having a section ID.

GRADUATE STUDY RECOMMENDATION

Adopted October 24, 2008

One of the Virginia Board of Accountancy's (VBOA) responsibilities is to establish minimum levels of education required to become licensed CPAs and to protect the public interest. Most states, including Virginia, now require a minimum of 150 semester hours of education and also specify a minimum number of semester hours in accounting courses and in business courses. The goal of these requirements is to assure an adequate depth of knowledge in accounting and business as well as adequate breadth in general education.

Some students may be able to meet all of these requirements via an intensive study of accounting and business during their undergraduate study. Others may pursue both undergraduate and graduate study in accounting. Still others may focus much of their study of accounting and business at the graduate level, having pursued an undergraduate major other than accounting. All of these strategies can fulfill the minimum educational requirements to become a licensed CPA.

The VBOA encourages students preparing to become licensed CPAs to elect courses wisely in meeting the requirement of 150 semester hours of education, such as courses that provide knowledge, skills and abilities that can assist them to become better accounting professionals. They should incorporate some graduate level study of accounting into their educational plans. The VBOA believes that the increased rigor and the strategic focus of graduate level courses can be valuable in preparing future accounting professionals to meet the increasing demands of the marketplace and to excel in the practice of
public accounting.

The VBOA offers this recommendation as the shared opinion of its members, not as an official VBOA position. The formal educational requirements for licensure are specified in the Virginia accountancy statutes and in the related regulations, which can be found on the VBOA's website at www.boa.virginia.gov.

The VBOA encourages students preparing to become licensed CPAs to stay updated about developments by reviewing the VBOA website regularly.

Note: As of March 2023, the VBOA continues to support the above recommendation. However, we acknowledge that, since its adoption date, all states require a minimum of 150 semester hours of education and an accounting concentration or equivalent and, as a result, are deemed substantially equivalent.

Guidelines for Disposition of Cases Involving the Unlicensed Use of the CPA Title by a Former Licensee

TABLE OF CONTENTS

Policy statement……..…..2

Statement of intent……2

Use of the CPA Title

I. Violation: Use of the CPA title as a credential adjacent to a former licensee's name……..3

II. Violation: Use of the CPA title in skills, licensing, or biographical references……..4

III. Violation: Use of the CPA title as a credential adjacent to a former licensee's name identified during the review of an approved reinstatement application……5

IV. Violation: Use of the CPA title in skills, licensing, or biographical references identified during the review of an approved reinstatement application……7

Applicable Laws……9

Summary Guideline Table……10

POLICY STATEMENT:

It is prohibited by the Code of Virginia for persons to use the CPA title in Virginia without proper licensure. The Virginia Board of Accountancy ("Board") has the ability to impose penalties for unlicensed use of the CPA title pursuant to Code of Virginia §54.1-4413.4. These guidelines are intended to serve as an aid to help the Board impose appropriate and fair penalties when it has determined a person has made use of the CPA title in violation of the Code of Virginia.

STATEMENT OF INTENT:

The Board has provided these guidelines to Board Staff to assist in the effective, efficient, and fair resolution of certain cases involving violations of "Use of the CPA Title." As such, the Board hereby delegates to the Executive Director the authority to resolve enforcement cases that fall under these guidelines without prior approval from the full Board. A "case" as used in these guidelines shall be an investigation where the unlicensed use of the CPA title by a former licensee, in otherwise good standing with the Board, whose license expired due solely to the individual's decision to not renew and was not suspended or revoked by the Board, is the only violation and is the first case of this kind.

Repeat cases involving violations of "Use of the CPA Title" will be subject to VBOA enforcement processes outside of these guidelines.

If a licensee is found to have multiple violations, they will be subject to the Disciplinary Guideline with the highest penalty.

Nothing contained within these guidelines preclude VBOA to refer any case to the Board based on other facts or circumstances at the sole discretion of the VBOA.

Use of the CPA Title:

Individual licensees who either hold Active or Inactive CPA license status are permitted to use the CPA title. However, non-licensees, and former licensees such as those persons with a status of expired, suspended and/or revoked are not permitted to use CPA, Certified Public Accountant, or public accountant in any form.

Per Code of Virginia §54.1-4400, "Using the CPA title in Virginia" means using "CPA," "Certified Public Accountant," or "public accountant" (i) in any form or manner of verbal communication to persons or entities located in Virginia or (ii) in any form or manner of written communication to persons or entities located in Virginia, including but not limited to the use in any abbreviation, acronym, phrase, or title that appears in business cards, the CPA wall certificate, internet postings, letterhead, reports, signs, tax returns, or any other document or device.

DRAFT

I. Violation: Use of the CPA title as a credential adjacent to a former licensee's name (for reinstatements see sections III & IV)

Use as a credential: Only Active or Inactive CPAs are permitted to use the CPA title as a credential adjacent to their name, i.e., John Doe, CPA. Formerly licensed CPAs are not permitted to use the credential in this manner.

a. Disciplinary guidelines for use of the CPA title as a credential adjacent to a former licensee's name with a qualifier

Use of the CPA title by a former licensee as a credential adjacent to her or his name followed by a qualifying term which clearly indicates that the license is no longer valid are subject to the following disciplinary guidelines. These situations include, but are not limited to, uses such as - *J. Doe, CPA (2011-2015) or J. Doe, CPA Expired*.
*The use of the term "Inactive" is not permitted as it is a recognized CPA license status.

Action	Disciplinary Guideline
Upon discovery	Advisory Letter with instructions and deadlines for removing the unlicensed use of the title.
Failure to correct as instructed	Subject to enforcement process outside these guidelines.

b. Disciplinary guidelines for use of the CPA title as a credential adjacent to a former licensee's name with no qualifier

Use of the CPA title by a former licensee as a credential adjacent to his or her name with no qualifier that clearly indicates that the license is no longer valid are subject to the following disciplinary guidelines. These situations include, but are not limited to, uses such, *J. Doe, CPA,* or John Doe, CPA.

Length of Expiration	Disciplinary Guideline
60 days or less	Advisory Letter with instructions and deadlines for removing the unlicensed use of the title.
61 days to 180 days	Consent Order with reprimand, instructions, and deadlines for removing the unlicensed use of the title.
181 days to 1 year	Consent Order with reprimand, instructions, and deadlines for removing the unlicensed use of the title, and monetary penalty of $500 - 750.
> 1 year or failure to correct as instructed	Subject to enforcement process outside these guidelines.

DRAFT

II. Violation: Use of the CPA title in skills, licensing, or biographical references (for reinstatements see sections III & IV)

Use as a reference: Only Active or Inactive CPAs are permitted to use the CPA title as a reference in any form or manner, such as but not limited to, the licensing, skills or similar section on a resume, curriculum vitae, or social media site, such as LinkedIn, or referred to in the body of a professional bio.

a. Disciplinary guidelines for use of the CPA title with a qualifier in manners such as skills, licensing, or biographical reference

Use of the CPA title by a former licensee in manners such as, but not limited to, skills or similar section on a resume, curriculum vitae, or social media site, such as LinkedIn, or referred to in the body of a professional bio followed by a qualifying term that clearly indicates the license is no longer valid, for example, "I was previously a *CPA licensed from 2001 to 2010,"* are subject to the following disciplinary guidelines.
*The use of the term "Inactive" is not permitted as it is a recognized CPA license status.

Disciplinary Guideline:	No action will be taken by the VBOA.

b. Disciplinary guidelines for use of the CPA title with no qualifier in manners such as skills, licensing, or biographical reference

Use of the CPA title by a former licensee in manners such as, but not limited to, skills or similar section on a resume, curriculum vitae, or social media site, such as LinkedIn, or referred to in the body of a professional bio without clear indication the credential is no longer valid by a former licensee are subject to the following disciplinary guidelines.

Length of Expiration	Disciplinary Guideline
180 days or less	Advisory Letter with instructions, and deadlines for removing the unlicensed use of title.
181 days to 1 year	Consent Order with reprimand, instructions and deadlines for removing the unlicensed use of title.
> 1 year to 5 years	Consent Order with reprimand, instructions and deadlines for removing the unlicensed use of title, and a monetary penalty of $250 - $500 (plus $150 for each year over 1 year).
> 5 years or failure to correct as instructed	Subject to enforcement process outside these guidelines.

DRAFT

III. Violation: Use of the CPA title as a credential adjacent to a former licensee's name identified during the review of an approved reinstatement application

Use as a credential identified during the reinstatement process: Only Active or Inactive CPAs are permitted to use the CPA title as a credential adjacent to their name, i.e., John Doe, CPA. Formerly licensed CPAs are not permitted to use the credential in this manner. The following guidelines apply only when this violation is identified during the reinstatement process[1].

a. Disciplinary guidelines for use of the CPA title as a credential adjacent to a former licensee's name with a qualifier identified during the reinstatement process.

Use of the CPA title by a reinstated licensee as a credential adjacent to her or his name during the time their license was expired followed by a qualifying term that clearly indicates that the license was no longer valid, which is identified by the VBOA during the reinstatement process, is subject to the following disciplinary guidelines. These situations include, but are not limited to, uses such as - *J. Doe, CPA (2011-2015) or J. Doe, CPA Expired*
*The use of the term "Inactive" is not permitted as it is a recognized CPA license status.

Compliant with CPE requirements during the past reporting period. The disciplinary guidelines below apply only when the licensee demonstrates they have 1) met all CPE requirements as applicable (including the prior 3 years) to hold a license during the expired period, 2) has no other disciplinary actions from the VBOA during the expired period, and 3) has no pending cases or open Orders with the VBOA.

Length of Expiration	Disciplinary Guidelines
180 days or less	No action will be taken by the VBOA.
181 days to 1 year	Advisory letter.
>1 to 5 years	Consent Order, with a reprimand and a monetary penalty of $100 to $500 (plus $150 for every year over 1 year).
Over 5 years	Subject to enforcement processes.

Not compliant with CPE requirements during the past reporting period. The disciplinary guidelines below apply when the licensee does not demonstrate compliance with all CPE requirements as applicable (including the prior 3 years) to hold a license during the expired period and has no other disciplinary actions from the VBOA during the expired period and has no pending cases or open Orders with the VBOA.

[1] Reinstating a Virginia individual CPA license must include meeting the requirements of Code of Virginia § 54.1-4413.2, meeting the CPE requirements in accordance with VBOA regulation 18VAC5-22-90, and submitting an individual CPA License Reinstatement Form to the VBOA with payment of the required fee(s), CPE documentation, and other requested information.

Length of Expiration	Disciplinary Guidelines
90 days or less	No action will be taken by the VBOA.
91 days to 1 year	Advisory letter
>1 to 5 years	Consent Order, with a reprimand and a monetary penalty of $250 to $750 (plus $150 for every over 1 year).
Over 5 years	Subject to enforcement processes.

b. Disciplinary guidelines for use of the CPA title as a credential adjacent to a former licensee's name with no qualifier identified after the former licensee has submitted his or her application for reinstatement.

Compliant with CPE requirements during the past reporting period. The disciplinary guidelines below apply only when the licensee demonstrates they have 1) met all CPE requirements as applicable (including the prior 3 years) to hold a license during the expired period, 2) has no other disciplinary actions from the VBOA during the expired period, and 3) has no pending cases or open Orders with the VBOA.

Length of Expiration	Disciplinary Guideline
1 year or less	Advisory Letter.
> 1 to 5 years	Consent Order with a reprimand and monetary penalty of $250 to $500 (plus $150 for each year over 1 year).
Over 5 years or Failure to comply as instructed	Subject to enforcement processes outside these guidelines.

Not compliant with CPE requirements during the past reporting period. The disciplinary guidelines below apply when the licensee does not demonstrate compliance with all CPE requirements as applicable (including the prior 3 years) to hold a license during the expired period and has no other disciplinary actions from the VBOA during the expired period and has no pending cases or open Orders with the VBOA.

Length of Expiration	Disciplinary Guideline
180 days or less	Advisory Letter.
181 days to 1 year	Consent Order with a reprimand.
>1 year to 5 years	Consent Order with a reprimand and monetary penalty of $500 to $750 (plus $250 for each year over 1 year).
> 5 years	Subject to enforcement process outside these guidelines.

DRAFT

IV. Violation: Use of the CPA title in skills, licensing, or biographical references identified during the review of an approved reinstatement application

Use as a credential identified during the reinstatement process: Only Active or Inactive CPAs are permitted to use the CPA title as a reference in the licensing, skills or similar section on a resume, CV, or social media site, such as LinkedIn, or referred to in the body of a professional bio. The following disciplinary guidelines apply only when this violation is identified during the reinstatement process[2].

a. Disciplinary guidelines for use of the CPA title in skills, licensing, or biographical reference with a qualifier identified during the reinstatement process.

Use of the CPA title by a licensee who, while their license was not active, in manners such as, but not limited to, skills or similar section on a resume, curriculum vitae, or social media site, such as LinkedIn, or referred to in the body of a professional bio followed by a qualifying term that clearly indicates the license is no longer valid, for example, "I was previously a CPA licensed from 2001 to 2010," during the period their license was expired are subject to the following disciplinary guideline.

Disciplinary Guideline:	No action will be taken by the VBOA.

b. Disciplinary guidelines for use of the CPA title in skills, licensing, or biographical reference with no qualifier identified during the reinstatement process.

Use of the CPA title by a licensee who, while their license was not active, in manners such as, but not limited to, skills or similar section on a resume, curriculum vitae, or social media site, such as LinkedIn, or referred to in the body of a professional bio without clear indication the credential is no longer valid during the period their license was expired are subject to the following disciplinary guidelines.

Compliant with CPE requirements during the past reporting period. The disciplinary guidelines below apply only when the licensee demonstrates they have 1) met all CPE requirements as applicable (including the prior 3 years) to hold a license during the expired period, 2) has no other disciplinary actions from the VBOA during the expired period, and 3) has no pending cases or open Orders with the VBOA.

Length of Expiration	Disciplinary Guideline
180 days or less	No action will be taken by the VBOA.

[2] Reinstating a Virginia individual CPA license must include meeting the requirements of Code of Virginia § 54.1-4413.2, meeting the CPE requirements in accordance with VBOA regulation 18VAC5-22-90, and submitting an individual CPA License Reinstatement Form to the VBOA with payment of the required fee(s), CPE documentation, and other requested information.

181 days to 1 year	Advisory letter.
> 1 year to 5 years	Consent Order with a reprimand, and monetary penalty of $100 to $350 (plus $100 for each year over 1 year).
> 5 years	Subject to enforcement processes outside these guidelines.

Not compliant with CPE requirements during the past reporting period. The guidelines below apply when the licensee does not demonstrate continued compliance to VBOA's CPE requirements or regulations and has no other disciplinary actions from the VBOA during the expired period and has no pending cases or open Orders with the VBOA.

Length of Expiration	Disciplinary Guideline
90 days or less	No action will be taken by the VBOA.
91 days to 1 year	Advisory letter.
>1 year to 5 years	Consent Order with a reprimand, instructions, and monetary penalty of $250 to $500 (plus $150 for each year over 1 year).
> 5 years	Subject to enforcement process outside these guidelines.

Any cases that are outside these guidelines will be subject to VBOA enforcement processes and be sent to a Board member for review.

These guidelines supersede the guidelines adopted by the Board on July 11, 2022.

DRAFT

Applicable Laws

§ 54.1-4400. Definitions.

As used in this chapter, unless the context clearly indicates otherwise…"Using the CPA title in Virginia" means using "CPA," "Certified Public Accountant," or "public accountant" (i) in any form or manner of verbal communication to persons or entities located in Virginia or (ii) in any form or manner of written communication to persons or entities located in Virginia, including but not limited to the use in any abbreviations, acronym, phrase, or title that appears in business cards, the CPA wall certificate, Internet postings, letterhead, reports, signs, tax returns, or any other document or device. Holding a Virginia license or the license of another state constitutes using the CPA title.

* * *

"Practice of Public Accounting" means the giving of an assurance other than (i) by the person or persons about whom the financial information is presented or (ii) by one or more owners, officers, employees, or members of the governing body of the entity or entities about whom the financial information is presented.

* * *

§ 54.1-4409.1. Licensing requirements for persons.

A. A person must be licensed in order to use the CPA title in Virginia.

1. The person shall hold a Virginia license if he provides services to the public and the principal place of business in which he provides those services is in Virginia.
2. Other persons shall not be required to hold a Virginia license in order to use the CPA title in Virginia provided that they hold the license of another state and comply with the substantial equivalency provisions of § 54.1-4411.

§ 54.1-4414. Prohibited acts.

Neither (i) a person who does not hold a Virginia license or who does not meet the requirements to use the CPA title in Virginia under the substantial equivalency provisions of § 54.1-4411 nor (ii) an entity that does not meet the criteria prescribed by subdivision D 1 of § 54.1-4412.1 shall:

1. Practice public accounting.
2. Claim to hold a license to use the CPA title.
3. Make any other claim of licensure, registration, or approval related to the preparation of financial statements that is false or misleading.
4. Use the CPA title; or
5. Refer to any of the standard-setting authorities listed in the standards of conduct and practice in subdivisions 5 and 6 of § 54.1-4413.3 or refer to or use any of the terminology prescribed by those authorities for reporting on financial statements, in any form or manner of communication about services provided to persons or entities located in Virginia.

DRAFT

VIOLATION FOR USE OF CPA TITLE
SUMMARY GUIDELINES FOR DIPOSITION OF CASES

AL = Advisory Letter
CO = Consent Order with Reprimand

Section	Status of License	Length of Expiration: < 61 days	61 to 90 days	91 to 180 days	181 days to 1 year	> 1 year to 5 years	> 5 Years	Failure to Comply
Adjacent to Name w/Qualifier								
I.	Former Licensee	AL	AL	AL	AL	AL	AL	Enforcement
III.	During Approved Reinstatement and *CPE Compliant*	No Action	No Action	No Action	AL	CO, $100-$500, +$150 each year >1	Enforcement	Enforcement
III.	During Approved Reinstatement and ***Not*** *CPE Compliant*	No Action	No Action	AL	AL	CO, $250-$750, +$150 each year >1	Enforcement	Enforcement
Adjacent to Name w/o Qualifier								
I.	Former Licensee	AL	CO	CO	CO + $500-750	Enforcement	Enforcement	Enforcement
III.	During Approved Reinstatement and *CPE Compliant*	AL	AL	AL	AL	CO, $250-$500, +$150 each year >1	Enforcement	Enforcement
III.	During Approved Reinstatement and ***Not*** *CPE Compliant*	AL	AL	AL	CO	CO, $500-$750, +$250 each year >1	Enforcement	Enforcement
Bio, Resume, Social Media, Etc. w/Qualifier								
II.	Former Licensee	No Action	No Action	No Action	No Action	No Action	No Action	N/A
IV.	During Approved Reinstatement	No Action	No Action	No Action	No Action	No Action	No Action	N/A
Bio, Resume, Social Media, Etc. w/o Qualifier								
II.	Former Licensee	AL	AL	AL	CO	CO, $250-$500, +$150 each year >1	Enforcement	Enforcement
IV.	During Approved Reinstatement and *CPE Compliant*	No Action	No Action	No Action	AL	CO, $100-$350, +$100 each year >1	Enforcement	Enforcement
IV.	During Approved Reinstatement and ***Not*** *CPE Compliant*	No Action	No Action	AL	AL	CO, $250-$500, +$150 each year >1	Enforcement	Enforcement