

August 25, 2020

Mr. J. Coalter Baker, Chair
NASBA Uniform Accountancy Act Committee
150 Fourth Avenue North
Suite 700
Nashville, TN 37219

By e-mail: uaacomment@nasba.org

Re: Proposed Revisions to the Uniform Accountancy Act's Model Rules on Education

Dear Mr. Baker:

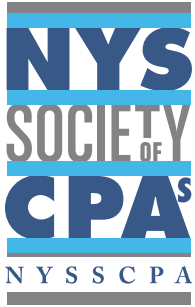
The New York State Society of Certified Public Accountants (NYSSCPA), representing more than 22,000 CPAs in public practice, business, government and education, welcomes the opportunity to comment on the above-captioned proposed revisions.

The NYSSCPA's Future of Accounting Education Committee deliberated the proposed revisions and prepared the attached comments. If you would like additional discussion with us, please contact Nina Terranova-Dorata, Chair of the Future of Accounting Education Committee, at (718) 990-7329, or Ernest J. Markezin, NYSSCPA staff, at (212) 719-8303.

Sincerely,

Edward L. Arcara
President

Attachment



**NEW YORK STATE SOCIETY OF
CERTIFIED PUBLIC ACCOUNTANTS**

**COMMENTS ON
PROPOSED REVISIONS TO THE UNIFORM ACCOUNTANCY ACT'S MODEL
RULES ON EDUCATION**

August 25, 2020

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Nina Terranova-Dorata

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New York State Society of Certified Public Accountants

Comments on

Proposed Revisions to the Uniform Accountancy Act's Model Rules on Education

The New York State Society of Certified Public Accountants (NYSSCPA) appreciates the opportunity to offer comments to the National Association of State Boards of Accountancy (NASBA or the Board) on its proposed revisions to Uniform Accountancy Act (UAA) Model Rules on Education.

General Comments

We observe that the additional content introduced is much aligned with the structure of the CPA Evolution Model. We understand that institutions of higher education should have the flexibility to deliver the proposed content; however, given the significant content additions, there is much concern with scalability by accounting units to deliver the proposed content. Therefore, we ask for clarification as to whether the added content is from a topical perspective, or from a course perspective; given that measurement is from a semester credit hour (SCH) perspective. Further, if required content is delivered outside the accounting unit yet required within an accounting program, we believe further clarification is necessary on the impact, if any, for Level 1 program classification.

Specific Comments

Rule 5-1 - Education requirements – definitions

The U.S. Department of Education Final Accreditation Regulations, which can be found at <https://www.govinfo.gov/content/pkg/FR-2019-11-01/pdf/2019-23129.pdf>, describes some reasons for changing “national and regional” accreditation terminology to “institutional” accreditation. We suggest that the language in paragraphs (c) and (c) 3. align with those Regulations.

Although we agree with the Level 1 and Level 2 separate accounting (Association to Advance Collegiate Schools of Business-International (AACSB)) program accreditation and business program accreditation (AACSB and Association of Collegiate Business Schools and Programs ACBSP), respectively, and Level 3 being institutional accreditation only, we offer the following comments:

Paragraph 1. refers to an “...accounting program that is accredited by an organization recognized by the Board...such as AACSB.” The ACBSP is recognized as a Level 2 accrediting organization. ACBSP provides a separate Accounting Program Accreditation (see <https://acbsp.org/page/accreditation-type-accounting>) and currently discloses 17 institutions having that separate accounting accreditation. We suggest that clarification be made if Level 1 is

limited to those accredited by the AACSB as being the organization recognized only for accounting accreditation.

We recognize the rarity of AACSB accounting program accreditation (approximately 190 institutions domestically) and its impact on quality accounting education.

Paragraph 2. We suggest that a clarification be made as to the accreditor for the accounting accreditation that may require the statement “AACSB accounting accreditation.”

Paragraph 3. We suggest that perhaps some simplicity be used in stating that a Level 3 institution does not meet the criteria of a Level 1 or Level 2 but requires institutional accreditation.

We believe that a list of Board recognized accrediting agencies should be provided in the opening of Rule 5-1 as all Levels must require institutional accreditation to qualify. Then, by default, a Level 4 designated institution has no accreditation and will not qualify under the UAA.

We also suggest that Institutional accreditors for international institutions should be identified.

Finally, clarification is suggested with respect to the Board’s right to transcript review that preempts any Level classification to ensure quality. Official transcripts are required from all candidates upon applying for the Uniform CPA exam irrespective of institutional or program accreditation. If optional review is the intention regardless of Level classification, we suggest that this be made clear.

Rule 5-2 – Education requirements – Determining compliance of the applicant’s education

Paragraph (a) We support the proposed changes in this paragraph.

Paragraph (c) 1. We recognize the Board’s intent for a transcript review for all levels. We recommend clarification be considered given our comments for Rule 5-1.

Paragraph (d) 2. We believe confusion exists as to the number of credits at each level required for introductory and core courses. Under New York State Education Department requirements, the elimination of cost/managerial accounting from the minimum requirements would require a change in New York State Education Department Regulations. We are also concerned that requiring “...a minimum of twelve SCH in some or all of the subject-matter content areas listed in Rule 5-2(d)(2)v through xvii...” implies that each content area represents a single three SCH and thus does not permit flexibility in course design to deliver the content knowledge necessary for a newly licensed CPA. Without flexibility in course design, institutions may face a scalability issue in delivering the prescribed content areas.

Paragraph (d) 4. We recommend that any of the 24 SCH of business content taken outside the business school be counted towards business course work. To maintain relevancy, data analytics courses taken should remain within a business school.

Paragraph (d) 7. – We acknowledge the value of an internship model and its benefits to students for employment, attainment of CPA licensing and growing as a professional, requires

disciplined decisions. However, unless there is an expectation to increase required degree credits, the likelihood of reaching a maximum of nine SCH is remote. Having a single three SCH accounting internship course is barely achievable as an accounting/business elective due to numerous and conflicting requirements of degree programs. We believe that clarification of the distribution of the nine SCH is warranted; for example, as a suggestion: three to accounting, three to business, and three to general electives.