

December 2, 2024

Mr. Thomas Neill, CPA – Chair, AICPA UAA Committee  
American Institute of Certified Public Accountants  
1345 6<sup>th</sup> Avenue, 17<sup>th</sup> Floor  
New York, New York 10105

Ms. Nicola Neilon, CPA – Chair, NASBA UAA Committee  
National Association of State Boards of Accountancy  
150 Fourth Avenue North, Suite 700  
Nashville, TN 37219

Dear Committee Members:

The Utah Association of Certified Public Accountants (UACPA) is pleased to comment on proposed amendments to the Uniform Accountancy Act Eighth Edition – January 2018 issued September 30, 2024. The UACPA represents more than 4,300 CPAs and future CPAs working in public practice, industry, government, education, and non-profit organizations. We appreciate the opportunity to take part with the AICPA and NASBA as you seek to modernize current rules and model language while maintaining the integrity of the profession and protecting the public.

In drafting our comments, we have taken into consideration the vast changes that have occurred over the past 30 years when conversations convened to adopt a 150-hour education requirement, updated experience requirements and maintaining passage of the CPA exam in order to license at the individual state level. We have taken into consideration current barriers to licensure, current regulatory environment, continued future decline of population due to increased retirement with an aging population and decrease in birthrates across our licensing jurisdictions.

We appreciate both the time and efforts of the UAA Committee volunteers over the last several months as there have been many passionate debates and commentary as to the future of the profession. We recognize that the Uniform Accountancy Act (UAA) is an integral model statute that promotes consistency in legislation throughout the licensing jurisdictions. We also recognize that as currently proposed, the role of the UAA is at risk, as adoption from state to state may not occur.

As proposed, the changes to the UAA pose several concerns to the UACPA as outlined below:

#### **Section 5: Qualifications for a Certificate as a Certified Public Accountant**

The addition of a competency-based experience as prescribed in Section 5(f)(2) is of concern for the following reasons:

- The competency-based experience pathway as currently defined will pose undue burdens on employers and CPA candidates as the process is complicated, cumbersome, and very subjective.
- Feedback from our members indicate that there could be potential liability on CPA Evaluators as the competency components are quite subjective, context sensitive and biased and difficult to

standardize. There is also concern that a CPA Evaluator will bring their own unconscious bias's when evaluating a CPA candidate.

- Legislators across the country are seeking ways to tear down unnecessary barriers to licensure. When discussing a competency-based model with our own legislators, many were concerned about the complexity and subjectivity. Many felt the pathway was a way for national organizations to step into a jurisdiction and mandate how licensing agencies conduct their business. Licensure needs to remain at the state level.
- The exposure draft does not take into consideration language that is being proposed in many jurisdictions that would enable a person to meet education requirements with a bachelor's degree plus two years' experience as determined by board rule. Jurisdictions already have varying degrees of prescribed experience in rule.

### **Section 23: Substantial Equivalency**

Modernizing the requirements to become a CPA is critical if we are to attract CPAs from a diverse populations and backgrounds. Mobility has been a licensure challenge for years. In our opinion:

- The National Qualification Appraisal Service (NQAS) is problematic. NQAS' authority determines whether a licensing jurisdiction or individual CPAs qualify for substantial equivalency and/or dilutes jurisdiction authority as currently written. NASBA is not a regulatory agency nor should NQAS have the ability to override a jurisdiction licensing agency. Licensure needs to remain at the jurisdiction level.
- To resolve the challenges of mobility as currently stated, we propose language that would support automatic mobility with guardrails related to education and experience and passage of the Uniform CPA Exam to ensure minimum requirements that would not disrupt mobility or substantial equivalency. In a world where many CPAs work with clients globally, automatic mobility will reduce complexity for regulators and facilitate CPA expertise across all boundaries, thus meeting needs of the underserved.
- Alabama, Nebraska, Nevada and North Carolina already operate under automatic mobility; time has shown that it works. Executive directors from those states have willingly supported automatic mobility for other licensing jurisdictions.

Rather than the current proposals in the exposure draft, we recommend the following:

- Allow a pathway for a bachelor's degree plus two years' experience as directed by board rule.
- Master's degree plus one year experience as directed by board rule.
- Current language of 150 credit hours plus one year experience as directed by board rule.
- Adopt automatic mobility language with practice privileges with guardrails relating to education, experience, and passage of the Uniform CPA Exam
- Adopt grandfathering language that allows a grace period while other jurisdictions adopt language; perhaps through December 31, 2030.

While appreciative of the time and effort spent by the UAA Committee, we respectfully request that the issues addressed in our response be sent back for consideration. We are at a crossroads in our profession. The value and needs for CPA continue to increase while the population of CPAs continues to decrease. It is imperative collaborative efforts among stakeholders to address the talent shortage and future pathways be addressed. We recommend a complete practice analysis of the profession that would

create a baseline of where we are now, while constituting regularly scheduled analysis in the future. This will enable stakeholders to better be able to pivot and meet the needs of the profession, while maintaining protecting the public.

We appreciate the opportunity to comment, and look forward to working with the AICPA, NASBA and other stakeholders as we seek to attract more CPAs. Should you have any questions or need clarifications, please contact me at [ss@uacpa.org](mailto:ss@uacpa.org).

Sincerely,



Susan A. Speirs, CPA  
CEO

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