

NEW YORK STATE BOARD FOR PUBLIC ACCOUNTANCY

January 29, 2025

Meeting Agenda
New York State Education Department
Board Meeting

89 Washington Ave, Room 217, Albany
1411 Broadway 10th Floor, Regents Room, NYC
100 Chestnut Street, Suite 1200, Rochester
333 West Washington Street, Suite 500, Syracuse
8321 Main Street, Williamsville

10:00 a.m. Motion to move to Executive Session

10:30 a.m. Motion to move to Public Session

• Review and approval of minutes of the October 23, 2024 Board Meeting Minutes	Pages 2 – 6
• Board Member Update - Farewell	
• Nominations Committee	Page 7
• Board meeting schedule for 2025 - 2026	Page 8
• Board office update	
• Education Committee <u>Committee Report</u> ○ NASBA's update on Professional Licensure Task Force – CPA Competency Experience Pathway – Guidelines and Uniform Accountancy Act Exposure Draft – comment letters	Pages 9 - 19
• Examination Committee <u>Committee Report</u> • Score Release and Exam Statistics • Prometric test center – NYC Mega Center • Extension Requests ○ Block Scheduling ○ Exam Rescheduling Fees ○ International locations ○ Exam Data	Pages 20 21 Pages 22 -23 Page 24 Pages 25 - 26 Pages 27 - 33
• Ad Hoc Education and Practice Committee	
• Practice Committee – No activities	
• NASBA ○ NASBA Annual Meeting – Oct 2024	Pages 34 - 38
• New Business	
• Upcoming Meeting Date – April 30, 2025 – In person only NYC location	

NEW YORK STATE BOARD FOR PUBLIC ACCOUNTANCY**October 23, 2024**

Meeting Minutes
New York State Education Department
Board Meeting

89 Washington Ave, Room 217, Albany
1411 Broadway, 10th Floor, Regents Room, NYC
100 Chestnut Street, Suite 1200, Rochester
333 West Washington Street, Suite 500, Syracuse
8321 Main Street, Williamsville

Chair Ms. Cohen called the meeting to order at 10:00 a.m.

<u>The following members were present:</u>	
Charles Abraham, CPA (NYC)	Brian Krist, Esq (NYC)
Anthony Basile, CPA (NYC)	John Lauchert, CPA (Syracuse)
Anthony Bracco, CPA (NYC)	Danilsa Lopez, CPA (NYC)
Elizabeth Bush, CPA (Syracuse)	Joseph Maffia, CPA (NYC)
Ann Burstein Cohen, CPA (NYC)	Maria Moran, CPA (Albany)
Crisy Geerholt (Albany)	Charles Pezzino, CPA (Buffalo)
Gretchen Guenther-Collins, CPA (Albany)	Kevin Richards, CPA (NYC)
Timothy Hammond, CPA (Syracuse)	James Schnell, CPA (Rochester)
Rose Hu, CPA (Buffalo)	Shelly Taleporos, CPA (Albany)
<u>Members absent:</u> Thomas Sciametta, CPA Alexander Buchholz, CPA	

Others in attendance:

Jennifer Winters, Executive Secretary, NYSED (NYC)
Julie McLoughlin, NYSED (Albany)
D. Edward Martin, CPA - Extended Board Member (NYC)
Stephen Langowski, CPA – Extended Board Member (NYC)

Public Session only:

Casey Fenton, Ostroff Associates, Inc. (Albany)
Ruth Singleton, NYSSCPA (NYC)
Calvin Harris, NYSSCPA (NYC)
Karen Sibayan, NYSSCPA (NYC)

The Board moved into Executive Session at 10:00 a.m., based on a motion made by Ms. Hu and seconded by Mr. Basile. The Board discussed the Office of Professional Discipline staff and disciplinary cases.

Executive Session adjourned at 10:39 a.m. based on a motion made by Mr. Abraham and seconded by Mr. Pezzino. The Chair moved the Board into Public Session at 10:47 a.m. based on a motion by Mr.

Bracco and seconded by Mr. Richards. All in attendance introduced themselves. The guests were introduced by Ms. Cohen for the New York City location and Ms. McLoughlin for the Albany location.

Review and Approval of Minutes

Based on a motion made by Ms. Hu and seconded by Ms. Moran, the Board unanimously approved the minutes of the July 24, 2024, Board meeting.

Board Member Update

The Board welcomed new member Timothy Hammond. The Board noted the farewell of member Alexander Buchholz and thanked him for his service to the Board. There are still board member position openings, so please forward any names to Ms. Winters. Ms. Cohen noted there have been a few referrals and recommendations, however, they do not always work out and need more recommendations than slots.

Peer Review Oversight Committee Annual Report

Ms. Cohen noted that the Chair of the Peer Review Oversight Committee, Dave Iles, was unable to be in attendance at the board meeting due to unexcepted events. Therefore, Ms. Winters presented the 2023 annual report. The report was included as part of the board packet. Discussion included the reasons for the AICPA to withhold information to the Peer Review Oversight Committee based on their interpretation of the Chapter 3 of the Peer Review Standards.

Board Office and Office of Professions Update

Ms. Winters reported that interviews were conducted since the last board meeting and a person was selected for the vacant staff position for the Education Program Assistant 1. They are expected to start the day following the board meeting on October 24th.

Due to the staffing shortages, a backlog of pre-licensure applications has remained steady with applications being processed from mid-September at approximately 190 in the queue. Likewise, the various registration applications are also in a backlog from mid-September as well with a mix of queue and email submissions.

Regulatory Update – No regulatory updates were noted other than the continued implementation of the professional education requirements for licensure.

Education Committee

Ms. Hu reported that as a result of the discussion item from last meeting, language was added to the website for the May 1, 2027, date for application materials to be submitted to allow time for the applicant to become licensed prior to August 1, 2027. The reason for the suggested proposal was discussed at the last board meeting to allow enough time for processing and notifies the applicants to submit the application materials in advance. Focusing on the regulatory language that indicates the individual must be licensed prior to August 1, 2027, it is unlikely someone can be reviewed and approved for licensure in

one day, for example.

Ms. Hu noted that NASBA and the AICPA released in September an initiative for a “Competency Based Pathway”, (formerly reported at the prior meeting as the Structured Professional Pathway) and Uniform Accountancy Act language for exposure and comments. The deadline for comments for the “initiative” is December 6, 2024, and the Uniform Accountancy Act is December 31, 2024. The Education Committee convened and prepared a draft comment letter to address both exposures as they are intertwined. Included in the packet was the draft comment letter and the Board thoroughly discussed the various issues and concerns with the proposals. Additional suggested language will be included in the letter to ensure that the very serious concerns within the proposals are communicated to NASBA and the AICPA.

Based on a motion by Mr. Krist and seconded by Ms. Lopez, the Board unanimously supported the concepts in the draft comment letter with supplemental information discussed at the meeting to accurately express its multitude of concerns with the proposals. The Education Committee members will work on the additions to the letter and Ms. Winters will upload a copy to the Sharepoint site for all members to view the comment letter.

During the discussion of the exposure drafts, other areas for monitoring include other states that are proposing a “traditional” 120 semester hours and 2-years’ experience pathway separate from the equated education (competency experience measurement) model. Emphasis was made that NASBA indicated that if a state adopts a “traditional” 120 semester hours and 2-years’ experience model that does not include the competency experience they will not deem it a substantially equivalent pathway.

Ms. Winters updated the board regarding the proposals that have been submitted regarding the CPA Evolution education requirements, known as CPA150E education requirements. She noted that there were several more programs approved by the Department, and many others that were reviewed and sent back to the school for further information or are under pending review. As noted in the report, a few new programs have been posted to the website listing. This will be a continuing item and will be reported on at the next meeting.

Examination Committee

Per reference of the analysis in the board packet, Mr. Abraham made note of the data regarding the new discipline and core sections and in particular highlighted the pass rates. The Board commented again on the higher pass rate of the Taxation Compliance and Planning discipline section.

Mr. Abraham reported an update on the NYC Mega Center closure due to the flooding will be through December. There will be temporary test center sites opened during the closure.

Mr. Abraham noted that the Certification of Out-of-State Licensure and Examination Grades, Form 3, was updated to reflect the new exam sections. Ms. Winters noted that a few other minor tweaks to the form were made as well. A copy of the revised form was included in the packet.

Since the previous board meeting Mr. Abraham provided a report on the examination extension requests. Ms. Winters noted that a few exam candidates have sought an “appeal” of the extension request denial. She noted that there is not an appeal to the decision; however, the exam candidate would have to follow the procedures in place prior to allowing extensions. The candidate would submit a request to the Committee on the Professions that goes to the Board of Regents to “waive” the examination condition requirement in the regulation.

Mr. Abraham noted the survey responses to the Examination Review Board survey that were included in the packet.

Practice Committee

Mr. Bracco reported that there were no practice committee activities since the last board meeting.

Ad Hoc Education and Practice Committee

A call for members from the education and practice committees was made to review the practice and mobility issues as it relates to substantial equivalency should another state adopt a pathway that is inconsistent with New York's pathways for licensure. The following members have volunteered to participate in this important review: Ms. Hu, Mr. Maffia, Mr. Lauchert, Mr. Sciametta, and Ms. Taleporos. Ms. Cohen and Ms. Moran as Chair and Vice Chair of the Board will also be part of the committee. Ms. Moran will be the Chair of the Ad Hoc Committee. Any other members who are interested in this Ad Hoc committee can contact Ms. Winters.

Items for consideration if the Competency Pathway or 120 semester hours and 2 years'-experience pathway move forward by NASBA or another State Board:

- Impacts on practice privilege / mobility. Including licensees from other states practicing in New York. A disruption to mobility will impact services to the public. The profession would be going backwards with adopting models that "undo" mobility / practice privilege.
- Impacts on endorsement applicants if states begin changing the pathways to licensure. Disruption to the endorsement pathway would require increased monitoring of states adoption of certain pathways for endorsement eligibility.
- Impacts on NASBA's determinations of substantial equivalency if a state creates their own alternative model.

Consistent with other committees, the Ad Hoc committee would report to the full Board its recommendations. The Board would then make the recommendations to the Department for consideration.

Based on a motion by Ms. Moran and seconded by Mr. Maffia, the Board unanimously agreed to establish the Ad Hoc Committee to review the matters outlined above.

NASBA

Ms. Winters and Ms. Cohen will be attending the NASBA Annual meeting held next week. They will report back to the full board at the next board meeting. The Board expressed its disappointment with NASBA's decision to charge \$450 for virtual attendance at this meeting, especially at a time when there is so much going on in the profession. They expressed that NASBA should be willing to provide the virtual attendance at no cost, consistent with the past years. It was noted that by having more board members actively engage and participate in the meeting will foster transparency as there are many issues before the profession.

New Business

The Board briefly discussed the topic of "Automatic Mobility" and the brief concept behind it with several states considering adopting modification to the mobility law to remove the "substantial equivalency" language. The Board noted that this will be an item to watch in the near future. It was noted that the Education Law expressly states "substantial equivalency" as do the Regulations of the Commissioner regarding practice privilege.

Likewise, a discussion ensued regarding states adopting portability law for licensees amongst a variety of professions that mitigates the necessity of “substantial equivalency”.

Concerns expressed for the public perception of adding a second lower level “tier” of CPAs with some of the alternative pathways being discussed.

The next board meeting will be held on January 29, 2025, board meeting will be held at several public locations via video conference. Ms. Cohen informed the members to mark their calendars for the April 30, 2025, in person meeting in New York City. Additionally, Ms. Cohen noted the upcoming meeting date of July 30, 2025, will be held virtually.

The public session adjourned at 12:47 p.m. based on a motion made by Mr. Bracco and seconded by Mr. Basile.

Respectfully submitted,

Jennifer B. Winters, CPA
Executive Secretary

Nominations Committee

Call of the State Board for Public Accountancy to establish a Nominations Committee of at least five members of the board. The Committee will establish a Chair of the Nominations Committee. The purpose is to seek and present the nominations for the positions of Chair and Vice Chair of the State Board for Public Accountancy for the term May 1, 2025 to April 30, 2026.

The Chair of the Nominations Committee will report the nominations at the April 2025 board meeting. The members of the Nominations Committee cannot be a member who is being nominated for the positions being elected.

Public Accountancy Board Meeting Schedule

2025-2026

<u>Date</u>	<u>Type</u>	<u>Location(s)</u>
Wednesday January 29, 2025	Video	TBD
Wednesday April 30, 2025	In person	New York City
Wednesday July 30, 2025	Video	TBD
Wednesday October 22, 2025	Video	TBD
Wednesday January 28, 2026	Video	TBD
Wednesday April 29, 2026	In person	New York City
Wednesday July 29, 2026	Video	TBD
Wednesday October 21, 2026	Video	TBD

November 8, 2024

National Association State Boards of Accountancy
Uniform Accountancy Act Committee
150 Fourth Avenue North
Suite 700
Nashville, TN 37219

American Institute of Certified Public Accountants
Uniform Accountancy Act Committee
1345 6th Avenue 27th Floor,
New York, NY 10105

Attn: Joint AICPA/NASBA UAA Committee Chairs,
Nicola Neilon, CPA, Chair, NASBA UAA Committee Chair
Thomas Neill, CPA, Chair, AICPA UAA Committee Chair

Submitted via survey links

Re: Uniform Accountancy Act Additional Licensure Pathway: Competency-Based Experience Pathway and CPA
Competency-Based Experience Pathway Exposure Draft

Dear Ms. Neilon and Mr. Neill:

The New York State Board for Public Accountancy (Board) appreciates the opportunity to offer comment to the concept exposure draft to the equivalent education requirements for licensure and to the proposed amendments to the Uniform Accountancy Act (UAA) Model Act and Rules. The Board advises the New York State Board of Regents (Regents) on regulatory, licensing, and disciplinary matters related to the practice of the profession of public accountancy in New York State.

OVERVIEW

The Board has had the opportunity to review the proposed pathway and provides its comments below. This comment letter will be submitted to both exposure drafts for the CPA Competency-Based Experience Pathway and the UAA as they are intertwined. In response to both, we stress the importance of uniformity. We believe it is in the best interest of the profession, exam candidates, and future licensure applicants to maintain uniformity amongst the State Boards on the education rules. In addition, it is in the best interest of protecting the public to have clarity and uniformity on licensure requirements for Certified Public Accountants. To achieve uniformity, the Board requests that this initiative be tabled for a more thoughtful, thorough, and comprehensive solution to the pipeline issues.

We offer the following specific comments:

SPECIFIC COMMENTS

Oversight Concerns

The New York Board is under the auspices of the New York State Education Department (SED) whereby all professional education programs that lead to licensure are registered through the SED. Any changes to the education

requirements for licensure must be approved by the governing Board of Regents through the regulatory process. Currently the regulation for professional licensure clearly requires 150-semester hours of qualifying transcript education earned from an institution of Higher Education that is accredited by an organization acceptable to the board.

The proposed requirement for a pathway that contains a bachelor's degree with an extra year of experience, even one that is designed to test competencies, will not satisfy the education requirement in New York State. This model does not provide an accredited institution overseeing the competency development and assessment, and no credit on-transcript is provided to demonstrate education accomplishment. A check-off sheet from a CPA evaluator attesting to competencies will not substitute for the missing 30 credit hours. Therefore, the applicant will not meet the 150-semester hour standard which is the only education standard in New York State.

Regulatory Concerns

The New York Board regulation for professional education was modified in 2022 to incorporate the more robust 150-semester hour changes that were adopted by the UAA in late 2020. This correlated to the CPA Evolution Exam changes that reflected increased need for technology skills, higher level critical thinking, and analysis skillsets. The implementation date for those changes is 2027, five years from the adoption of our regulations, to allow schools and universities ample time to modify their educational programs – incorporating the updates needed which are reflective of the AICPA Exam Blueprints and Model Curriculum. Within the changes to modify to the CPA Evolution education requirements, the regulations were amended to completely phase out the previous 120-semester hour and two-years' experience pathway.

Likewise, the regulations for professional education specifically require 150-semester hours in a program. Additionally, the definition of a unit of credit within the SED's regulation means that it is a unit of academic award applicable towards a degree offered by a Higher Education institution. The proposed UAA language does not satisfy these elements. Further, if this type of initiative is offered in other states, it *would not be* considered substantially equivalent to New York's standards for initial licensure, endorsement, or mobility.

Delegation of Authority

The Regents are responsible in the Education Law for approval of experience for New York State licensure applicants. While New York will not participate in this alternative pathway initiative, we cannot fathom delegating our regulatory responsibility to the National Association of State Boards of Accountancy to approve an applicant's experience for licensure. It is a concern that NASBA currently offers this service whereby NASBA facilitates locating a CPA who is willing to sign off on an applicant's experience though they are not a direct supervisor of the applicant. Further, it was noted the dichotomy that this type of more rigorous experience review would be a service provided for free by NASBA's National Qualification Appraisal Service in their NASBA Experience Verification Products and Service line. However, with the aforementioned experience reviews under the existing 150-semester hour pathway, applicants pay NASBA \$600 if domestic and \$800 if foreign to search for an "evaluator" for the one-year of experience requirement under the existing 150-semester hour pathway.

Mobility and Substantial Equivalency

We are all aware that currently and for a number of years this profession enjoys the portability to practice across state lines through mobility. The disruption to mobility and substantial equivalency that this proposal will cause cannot be stressed enough. As New York is one of the states with the most licensed Certified Public Accountants in the country, we are very concerned with an initiative that cannot be accepted for mobility and substantial equivalency.

Organizations in New York State employ a significant quantity of Certified Public Accountants, and there are also licensees being continuously transferred from other states to New York by their employers. The Board is extremely concerned with this initiative's resulting disruption to mobility and substantial equivalency, and its impact on individual CPAs who wish to practice in New York, on employers seeking qualified candidates, and on the public in need of public accounting services.

Public Perception and Pipeline

There is grave concern that this complex initiative will cause more confusion amongst incoming and prospective accounting students, CPA exam candidates, licensed CPAs, firm owners, and the public as a whole. While NASBA and the AICPA appear to be earnestly working at the pipeline issues, this proposal is misguided and misdirected. There appears to be refusal to call this pathway what it actually is: a 120-semester hour and two-years' experience pathway. It is a grave mistake to window dress and create a pathway that replaces education (in the technology and other higher-level skills that were so vehemently promoted as necessary in CPA Evolution) with experience. The cognitive dissonance on this is concerning.

We understand the argument that a CPA candidate may be able to obtain a license “easier” with 120-semester hours and two-years' of experience. However, the end result will increase the burden to the practicing CPAs and firm owners. We strongly discourage the idea of this pathway as it will not be substantially equivalent to the 150-semester hour pathway and will therefore have the consequence of reverting to a time whereby licensed CPAs must obtain multiple licenses, incur additional licensing fees, and take additional Continuing Professional Education (including ethics components) to fulfill multiple diverse state licensure requirements. Furthermore, we are concerned that this may cause a two-tier class of CPAs – those with proper education from an academic institution and those that obtain a license through an equated education of competency experience.

Undue Burden

Burdening the applicants, the firms, the CPA supervisors, the state boards with a “made up” equated credit pathway is just not acceptable to any of the interested parties. The applicants will be confused by the requirements set forth as each state considers adopting the competency-based experience pathway and will likely be less prepared for the CPA exam under CPA Evolution (given reverting back to lesser education in technology and higher-level skills). And for the part of firms, the onus would be on them to create and establish some type of training for their supervisors to properly assess competency – placing an undue burden on the firms. Furthermore, the firms will have an undue burden to track the firm's practice monitoring for individuals who do not meet the substantial equivalency requirements to practice through mobility in another state. The CPA supervisors will have an undue burden of assessing all the competencies outlined in the Appendix A of the concept exposure document.

Additionally, the state boards will have an undue burden of legally defending the equated competency pathway, since the 30 equated credits from an organization that is not an accredited Higher Education institution is subject to neither an independent review body nor an oversight mechanism. The state boards will also have an undue burden of changing its regulations, forms, website, review of content, databases to report this pathway in the Accountancy Licensure Database, etc.

And finally, there would be an undue burden for the state board, licensees, and all who are vested in clarity on how CPAs uphold public trust. Each of these parties would be placed in a position of being asked to defend the decrease in education with substituted experience while having so recently adopted regulations and communicated the needs for greater education. Recall that these recent changes requiring greater education were expressly adopted to prepare CPA candidates for the evolving nature of our profession and work as put forward in CPA Evolution. The proposed decrease in education is therefore indefensible.

Future Initiatives

The Board cannot stress uniformity enough and we feel that this initiative should not be pursued as currently presented. An experiential learning program should only be pursued if it is through an accredited degree granting institution of Higher Education in order to meet the 150-semester hour pathway. We are aware of several programs from various firms and institutions of Higher Education. Those initiatives should be explored further.

In addition, NASBA and the AICPA have recently established the Experience, Learn, and Earn (ELE) program which is designed to enable candidates with less than 150-semester hours to earn additional career-enhancing credit hours at a

very reasonable cost (often subsidized) while employed. We question why more effort is not invested in expanding this program to help qualified candidates, and we encourage expansion to include more educational institutions and additional coursework options, as well as further adoption by more firms across the country.

Furthermore, it would behoove NASBA and AICPA to acknowledge that this pathway is in essence a 120-semester hour pathway and two-years' of experience. This is particularly evident in that several states are pursuing a "traditional" 120-semester hour and two-years' experience pathway in lieu of this proposed competency-based pathway. A competency assessment as equated credit in the 150-semester hour pathway will only add to the confusion as noted above.

We believe that NASBA's continual changing criteria and creating initiatives is damaging and inhibiting the very pipeline issues they are purporting to address. It seems clear from the groundswell of divergent movement now in State Boards that the existing 150-semester hour requirement with one-year of experience requirement and a separate pathway of 120-semester hour and two-years' experience requirement is being sought after. As proposed, this competency pathway will contain challenges in implementation and result in a confusing system with divergent movements from State Boards. It would seem to be in everyone's best interest that NASBA and the AICPA not only call this what it is, a 120-semester hour with two-years' experience pathway, but move to codify it as just that. The education decisions for specifics should be left to the State Boards to determine what those criteria should be, and licensure requirements would be closer to uniform between states, minimizing mobility issues.

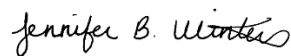
As stated in our previous letter, the Education Committee of the Board wants to encourage the pipeline task force to consider potential initiatives that are defensible in demonstrating upholding public trust; able to be defined in a regulatory manner to ensure uniformity; and which contain valid professional education that is within the current accreditation body model.

The Board supports the idea of exploring ways to increase the pipeline, however, with so many initiatives being proposed, the Education Committee of the Board is concerned that by continuing with such ideas, it may cause more uncertainty for the profession. We encourage that the three-legged stool of education, exam, and experience remain robust and distinct. The three critical "e's" for licensure must continue to include professional education from a properly accredited Higher Education institution, the professional experience requirement, and the Uniform CPA Examination that together are the three essential components in maintaining a trusted CPA licensure framework that protects the public and garners the trust of stakeholders. We strongly discourage initiatives like the CPA Competency-Based Experience Pathway that comingles the professional education with experience, and that will disrupt mobility and substantial equivalency.

Proposed changes and corresponding feedback provide an opportunity for valuable dialogue among all stakeholders. We respectfully request that all responses to proposed changes in these two exposure drafts, be it in the form of a survey or a comment letter, be conspicuously posted on the NASBA website.

We thank NASBA for providing us the opportunity to review and comment on the concept exposure draft for the alternative pathway for licensure in the CPA Competency-Based Experience Pathway and the related proposed amendments to the UAA Model Act and Rules. In closing, because we are unable to accept the CPA Competency-Based Experience Pathway we are, therefore, unable to support the UAA changes.

Sincerely,



Jennifer Winters, CPA
Executive Secretary
NY State Board for Public Accountancy

December 20, 2024

Thomas Neill, CPA, Chair, AICPA UAA Committee
American Institute of Certified Public Accountants
1345 Avenue of the Americas, 27th Floor
New York, NY 10105

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

RE: Comments of the New York State Society of Certified Public Accountants on AICPA and NASBA Exposure Draft on Proposed Changes to the Uniform Accountancy Act (the “UAA Exposure Draft”)

Dear Chairs Neill and Neilon:

The New York State Society of Certified Public Accountants (NYCPA), representing more than 19,000 CPAs in public practice, business, government and education, welcomes the opportunity to comment on the Exposure Draft on the proposed revisions to the Uniform Accountancy Act (UAA) Sections 5 and 23, and to the UAA Model Rules Articles 3 and 6, that has been prepared by the American Institute of Certified Public Accountants (AICPA) and the National Association of State Boards of Accountancy (NASBA) (the “UAA Exposure Draft”).¹ In reviewing the UAA Exposure Draft, as previously set forth in our letter dated December 3, 2024 concerning the proposed CPA Competency-Based Experience Pathway (our “December 3rd Letter”), we are very mindful of the need to balance the public trust that has been placed in our great profession with a future-oriented mindset that takes into account the pipeline challenges that our profession faces. With respect to the proposed CPA Competency-Based Experience Pathway, we reiterate the concerns set forth in our December 3rd Letter with both the level of subjectivity that the UAA Exposure Draft would require in the assessment of professional competencies, and the magnitude of the resources that CPA firms, regardless of size, would need to devote to this assessment, and refer the reader to that letter for our recommendations.² We now turn to address the UAA Exposure Draft’s focus on the determination of substantial equivalency for individuals licensed in other states.

¹ The UAA Exposure Draft is set forth at the following link: [Exposure draft: Proposed Uniform Accountancy Act Changes | Advocacy | AICPA & CIMA](#)

² Our December 3rd Letter is set forth at the following link: [nycpa-response-to-competency-based-experience-pathway.final.pdf](#)

Discussion

The UAA Exposure Draft would amend Section 23 “Substantial Equivalency” by acknowledging that a board of accountancy or NASBA’s National Qualification Appraisal Service (NQAS) may verify, once a new pathway to licensure is established by a jurisdiction, that a jurisdiction’s licensure requirements are in substantial equivalence with the CPA licensure requirements of the UAA. Should a jurisdiction enact legislation that includes one or more pathways that are **not** substantially equivalent to the UAA, the amendments provide a process for boards of accountancy to identify in a national licensee database the pathway used to license CPAs and to verify whether the CPA meets the licensure requirements defined in the UAA. According to the preamble that accompanies the UAA Exposure Draft, this will allow for easier determination of a CPA’s eligibility to practice through mobility with a practice permit.

While the Society commends the AICPA and NASBA for their initiative in preparing the UAA Exposure Draft and shares in the desire to facilitate CPA mobility, we have significant concerns with basing the determination of an individual’s eligibility to practice as a CPA in a state on the existence of such individual’s name in a national licensee database, the administration and monitoring of which is beyond the effective oversight of the state board of accountancy of the state in which the individual is seeking to practice as a CPA. We believe that such oversight must remain with such state board of accountancy. In the absence of the development of clear guidelines concerning this that can be monitored by the applicable state board of accountancy to allow for its effective oversight, we are not prepared to support the UAA Exposure Draft at this time.

We acknowledge the importance of CPA mobility between jurisdictions and are receptive to the development of solutions to help facilitate this that are premised upon the establishment of clear guidelines. Accordingly, we look forward to working with the AICPA and NASBA (together with both the various state boards of accountancy and other state CPA societies) on the development of guidelines that address this.

For any questions or concerns, please contact our government relations manager Jovan C. Richards at jrichards@nysscpa.org or (212) 719-8392.

Respectfully submitted,



Calvin Harris Jr., CPA
Chief Executive Officer, NYCPA



Kevin O’Leary
President, NYCPA

December 3, 2024

Thomas Neill, CPA, Chair, AICPA UAA Committee
American Institute of Certified Public Accountants
1345 Avenue of the Americas, 27th Floor
New York, NY 10105

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

**RE: Comments of the New York State Society of Certified Public Accountants on AICPA and NASBA
Exposure Draft on Proposed CPA Competency-Based Experience Pathway**

Dear Chairs Neill and Neilon:

The New York State Society of Certified Public Accountants (NYCPA), representing more than 19,000 CPAs in public practice, business, government and education, welcomes the opportunity to comment on the Exposure Draft on the proposed CPA Competency-Based Experience Pathway that has been prepared by the American Institute of Certified Public Accountants (AICPA) and the National Association of State Boards of Accountancy (NASBA) (the "Pathway Exposure Draft").¹ In reviewing the Pathway Exposure Draft, we are very mindful of the need to balance the public trust that has been placed in our great profession with a future-oriented mindset that takes into account the pipeline challenges that our profession faces. Against this context, we are particularly concerned with both the level of subjectivity that the Pathway Exposure Draft would require in the assessment of professional competencies, and the magnitude of the resources that CPA firms (both large and small) would need to devote to this assessment (which would place smaller firms at a significant competitive disadvantage in attracting talent). For these reasons, we respectfully recommend that the Pathway Exposure Draft be substantially modified to eliminate its competency-based approach and instead focus on additional alternative pathways, which may include a pathway that is premised on coupling 120 credit hours with two years of qualifying work experience.

¹ The Pathway Exposure Draft is set forth at the following link: [Exposure draft: Proposed "CPA Competency-Based Experience Pathway" | Certifications | AICPA & CIMA](#)

Discussion

The Pathway Exposure Draft sets forth a “New Pathway” under which CPA candidates could meet initial licensing requirements by exhibiting their competency in specific professional and technical areas. The professional competencies are set forth below, and the candidate is required to exhibit ***all seven professional competencies*** to satisfy the New Pathway:

- Ethical behavior
- Critical thinking and professional skepticism
- Communication
- Collaboration, teamwork and leadership
- Self-management and continuous learning
- Business acumen
- Technology mindset²

While the Society commends the AICPA and NASBA for their initiative in preparing the Pathway Exposure Draft, we have substantial concerns with the implementation of a pathway that is based on Competency-Based Experience. At its essence, the proposed process for evaluation of candidates is highly subjective (particularly with respect to the seven professional competencies) and would place an undue burden on both the CPA candidates and the CPA Evaluators. We anticipate that significant training would be required to permit the CPA Evaluators to develop the requisite skills to render an unbiased evaluation that meets specified criteria. Not all firms will have the resources available to devote to the training of their CPA Evaluators. It is therefore foreseeable that this would place smaller firms at a significant competitive disadvantage vis-à-vis larger firms in the recruitment of talent.

We are moreover concerned that the dynamics of the workplace will lead to ethical dilemmas as a result of the proposed competency-based pathway’s reliance on subjective evaluations in certifying candidates’ competencies. We question, for example, whether it would be realistic to expect a CPA Evaluator who currently works at the same firm as a candidate to negatively assess the candidate’s competency in collaboration, teamwork and leadership in light of the workplace consequences that could ensue if such

² In addition, under the New Pathway, the candidate is required to exhibit technical competency ***in one of the following three areas of technical competency***:

- Audit and assurance
- Tax
- Business and financial reporting

In addition to the Competency-Based Experience described above, candidates under the New Pathway would also still be required to earn a bachelor’s degree in accounting, complete one year of general qualifying experience, and pass the CPA exam.

negative assessment came to light. Similarly, the potential liability of CPA Evaluators for the subsequent acts of candidates they endorse raises additional process and legal questions.

These concerns, and the potentially uncomfortable workplace dynamics that they could produce, may well serve to create barriers that deter young professionals from entering the field of accounting. Further, it may damage CPA mobility between states that permit the New Pathway and those that do not.

It seems to be an implicit assumption of the Pathway Exposure Draft that the 150-credit hours requirement is a significant contributor to candidates not entering the profession or pursuing a CPA license. We believe that there is no better training for young accountants to become highly competent CPAs than for them to work under the supervision of seasoned CPAs. The Pathway Exposure Draft seems to be getting at that. However, a less subjective approach would be more effective in accomplishing this objective.

We urge the AICPA and NASBA to recognize the financial drain that is imposed upon candidates who require a fifth year of education in order to be eligible for licensure. The CPA exam is itself a highly effective gatekeeper for ascertaining technical competency. So that raises the question – *what are we as a profession doing by subjecting young professionals to barriers that discourage their entry into the profession and ultimately hinder their pursuit of the CPA license?*

We believe an alternative pathway that both maintains the public trust and makes the process less daunting to students *does indeed exist* in the form of an approach that would be centered upon the establishment of a 120-credit hours requirement coupled with two years of qualifying work experience. We would accordingly very much welcome the AICPA's and NASBA's development of a pathway (working together with both the various state boards of accountancy and the state CPA societies) that focuses on this approach.

For any questions or concerns, please contact our government relations manager Jovan C. Richards at jrichards@nysscpa.org or (212) 719-8392.

Respectfully submitted,



Calvin Harris Jr., CPA
Chief Executive Officer, NYCPA



Kevin O'Leary
President, NYCPA



American Academy of Attorney-CPAs

The power of the dual view

American Academy of Attorney CPAs
Comments on Proposed Amendments to the Uniform Accountancy Act to include the CPA
Competency-Based Experience Pathway
December 5, 2024

The American Academy of Attorney-CPAs (AAA-CPA) recognizes the significant challenges currently facing the accounting profession, including the declining number of candidates (i.e., CPA pipeline) and financial barriers to an accounting education and the eventual CPA license. We appreciate the efforts being made by the National Association of State Boards of Accountancy (NASBA) and the American Institute of CPAs (AICPA) to explore alternative solutions, including the proposed Competency-Based Experience Pathway, which seeks to modify the fifth-year education requirement for CPA licensure. The License and Education Requirements Committee of the AAA-CPA has reviewed the draft of the “CPA Competency-Based Experience Pathway” and offers the following comments.

The Competency-Based Experience Pathway

The Competency-Based Experience Pathway represents a radical shift in how CPA candidates may meet licensure requirements. Under this proposed model, CPA firms would assume the role of educational institutions, providing candidates with the equivalent of 30 college credits—typically required beyond a four-year degree—through structured work experience. This model would allow candidates to bypass the traditional fifth year of formal accounting education, offering a more flexible and potentially cost-effective route to CPA licensure.

While proponents argue that this pathway offers a more flexible and affordable solution, critics are concerned that it may undermine the educational foundation necessary to ensure that CPAs are fully prepared to serve the public. The current model, which requires 150 credit hours of formal education (including 30 credits beyond the bachelor’s degree), is designed to provide candidates with a broad, well-rounded education, including essential courses in accounting, business, liberal arts, and science. These subjects equip future CPAs with the intellectual and technical skills needed to navigate the complexities of the accounting profession.

The Importance of Rigorous Education

The debate over the Competency-Based Experience Pathway centers on whether reducing the educational requirements will compromise the integrity and competency of the profession. Education in accredited institutions is not only about preparing candidates for exams but also about ensuring they develop a comprehensive set of skills that will serve them throughout their careers. The 150-credit requirement helps ensure that candidates gain a well-rounded education, preparing them for the ethical decision-making, critical thinking, and problem-solving necessary for the challenges they will face in the field.

Moreover, education at accredited institutions is guided by experienced professors who possess the expertise to teach, mentor, and assess students’ progress. In contrast, the Competency-Based



American Academy of Attorney-CPAs

The power of the dual view

Experience Pathway relies on licensed CPAs—who, while experienced professionals—are tasked with evaluating candidates’ competencies without the formal structure and academic rigor that university programs provide. Critics argue that this shift may result in a less thorough education, as work experience alone may not offer the same intellectual foundation and theoretical understanding that is crucial for the profession.

Balancing Flexibility and Rigor

While alternative pathways like the Competency-Based Experience Pathway may appeal to candidates seeking faster, more affordable routes to licensure, it is vital that these pathways do not compromise the quality of education that ensures future CPAs are technically competent professionals. The primary concern is that substituting formal education with work experience could blur the lines between education and experience. In areas such as tax law or auditing, a strong conceptual foundation is essential, and work experience alone is unlikely to provide the depth of learning necessary for handling complex, real-world challenges.

We also believe that formal education in accredited institutions offers more consistency in teaching methodologies, assessments, and academic rigor, which may be difficult to achieve in a less structured, experience-based model. Therefore, while we acknowledge the potential benefits of alternative pathways, including greater flexibility and reduced costs, we are concerned that these advantages could come at the cost of public protection and the long-term quality of the profession.

Conclusion

The CPA pipeline crisis is indeed a pressing challenge that requires thoughtful solutions; however, addressing this issue should not come at the expense of the profession’s high standards. The Competency-Based Experience Pathway, though innovative, risks undermining the educational foundation that ensures the competency of CPAs and, by extension, protects the public. We urge NASBA and other stakeholders to consider robust evidence and thoroughly engage in debate before making significant changes to licensure requirements. Any modifications to the licensure process should prioritize the need for a well-rounded education that prepares CPAs to meet the complexities and challenges of the profession.

The AAA-CPA would be pleased to partner with NASBA and all interested stakeholders to help educate and market the extraordinary career opportunities available to CPAs, particularly to college recruits. We also recommend further evaluation of alternative pathways, including empirical studies or pilot programs, to assess their effectiveness before widespread implementation.

Thank you for the opportunity to provide comments on these critical issues. If you require any additional information or have any questions, please contact Anthony J. Tucci, (atucci@tuccilawcpa.com) or Daniel Rosefelt, (drosefelt@rosefeltlaw.com).

Examination Committee Report

ITEM 1 - Data on new sections and passing scores from October to December.

Core Sections

A total of 4029 core sections were taken in this time period.

AUD = Auditing and Attestation

FAR = Financial Accounting and Reporting

REG = Taxation and Regulation

AUD	1262	P	583	46%
		F	679	54%
FAR	1656	P	609	37%
		F	1047	63%
REG	1111	P	690	62%
		F	421	38%

Discipline Sections

A total of 831 discipline sections were taken in this time period.

BAR = Business Analysis and Reporting

ISC = Information Systems and Controls

TCP = Taxation Compliance and Planning

BAR	268	P	91	34%
		F	177	66%
ISC	240	P	114	48%
		F	126	53%
TCP	323	P	228	71%
		F	95	29%

ITEM 2

Prometric test center in New York City, the Mega Center, was flooded in June as previously reported at the board meetings. The test center has reopened in January 2025.

ITEM 3**Report on examination extension requests since the last board meeting:**

There were 9 examination extension requests from Oct to Dec 2024 where a final decision was made. This number excludes requests that were made but lacked the required supporting documentation. The review of the cases is noted below.

Approvals: Extension requests approved:

Reason	# of Requests	# of Committee Reviews
Medical	1	1
Totals	1	1

Disapprovals: Extension requests that were not approved:

Reason	# of Requests	# of Committee Reviews
Medical	3	
COVID (AKA Credit Relief)	1	
Workload	1	
Condition period changed and busy season	1	
No Basis	1	
Reinstatement of expired credit	1	
Totals	8	

Jennifer Winters

From: Patricia Hartman <phartman@nasba.org>
Sent: Wednesday, November 13, 2024 2:00 PM
To: Jennifer Winters
Subject: NASBA Introduces Block Scheduling



Mission Driven - Member Focused

A green banner with a radial line pattern, containing a white rectangular box with the text "NASBA INTRODUCES BLOCK SCHEDULING".

NASBA INTRODUCES BLOCK SCHEDULING

Hi Executive Directors,

As I shared at the NASBA Annual Meeting during the Executive Directors' Breakfast Meeting and we have previously mentioned as a new initiative at other recent conferences, NASBA has now authorized a program for colleges, universities and CPA firms to utilize Prometric's Block Scheduling service in the United States to schedule candidates for the Uniform CPA Examination (CPA Exam).

The intent of this program is to permit the colleges, universities and firms registering for the program to block seats at a nominal cost for their cohorts of candidates at single or closely located test centers in the United States, so they may test as groups to align with CPA Exam preparation schedules. The Block Scheduling service is not to be used for any other purpose. It is hoped that this offering will allow participants to benefit from study cohorts and provide some sense of accountability to complete testing.

NASBA will monitor the usage of this program to ensure candidates not participating in Block Scheduling can still obtain seats at test centers where Block Scheduling takes place. NASBA can suspend Block Scheduling during certain high-volume periods and Prometric will provide NASBA with reports regarding future testing capacity by test center based on block and traditionally scheduled seats, as well as utilization.

We are currently preparing information on the program to share with colleges, universities and firms. We will also share that communication with you in case you would like to forward it to any specific college, university and firm contacts within your respective jurisdictions.

If you have any questions or concerns, please feel free to contact me at phartman@nasba.org.

Thanks for all that you do!

Pat

Patricia Hartman

Director of Client Services



NASBA | 150 Fourth Avenue North | Suite 700 | Nashville, TN | 37219-2417
Phone: 615-880-4200 | Website: www.nasba.org

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Effective January 1, 2025 the fees have changed as shown below (page 34 of the Candidate Guide.) The biggest change is they now will charge a fee 31-60 days before the scheduled appointment.

Rescheduling/Cancellation Fees

If you call this many days before your scheduled appointment...	You will pay this fee to Prometric to make a change to the scheduled appointment.	Example
60+ days before your scheduled appointment	\$0.00	<p>You have scheduled an appointment to take AUD on August 18 at 8:00 a.m.</p> <p>On June 16, you realize that you have a conflict on August 18. You contact Prometric to reschedule.</p> <p>Because you rescheduled more than 60 days before the scheduled appointment, you will not have to pay a fee to reschedule. You may reschedule to a date before or after August 18; however, it must be before the expiration date of your NTS and you cannot reschedule to a date within five days of when you do the rescheduling (e.g., June 17, 18, 19, 20 or 21).</p>
31- 60 days before your scheduled appointment	\$30.00	<p>You have an appointment to take REG on October 3.</p> <p>On September 1, you realize you won't be able to take your examination on October 3 and you contact Prometric to reschedule.</p> <p>Because you rescheduled within the 31-60-day window, you will be required to pay \$30.00 to make a change to either the date, time or test center where you will take the REG section. You may reschedule to a date either before or after October 3; however, it must be before the expiration date of your NTS and you cannot reschedule to a date less than five days of when you do the rescheduling.</p>
5- 30 days before your scheduled appointment	\$60.00	<p>You have an appointment to take FAR on March 31.</p> <p>On March 3, you realize you won't be able to take your examination on March 31 and you contact Prometric to reschedule.</p> <p>Because you rescheduled within the 5-30 day window, you will be required to pay \$60.00 to make a change to either the date, time or test center where you will take the REG section. You may reschedule to a date either before or after March 31; however, it must be before the expiration date of your NTS and you cannot reschedule to a date within five (5) days of when you do the rescheduling.</p>
<p>Less than 5 days and up to 24 hours before the time of the scheduled appointment (based on local time for the testing center). If less than 24 hours, all fees are forfeited, and you must reapply.</p> <p><i>NOTE: Candidates with extreme circumstances may request an exception to policy through their board or CPAES. Additional fees may apply.</i></p>	\$90.88	<p>You have made an appointment to take AUD on October 18 at 1:00 pm.</p> <p>On October 14 at 1:01 pm, you contact Prometric to change the date of the appointment to October 19, which is before the expiration of your NTS.</p> <p>Because you contacted Prometric after 1:00 pm less than 5 days before the originally scheduled appointment, you are required to pay \$90.88 to make the scheduled change. You will not be able to reschedule to a date and time earlier than the original appointment time, but you may rescheduled to a date and time on or after October 19; however, it must be before the expiration date of your NTS.</p>

International Administration of the Uniform CPA Examination

In conjunction with the AICPA and Prometric, NASBA provides the opportunity for international administration of the Uniform CPA Examination (Exam) to be offered in Bahrain, Bermuda, Brazil, Egypt, England, Germany, India, Ireland, Israel, Japan, Jordan, Kuwait, Lebanon, Nepal, Saudi Arabia, Scotland, South Korea, Philippines and the United Arab Emirates.

The Exam application process is basically the same for U.S. and international candidates. In order to qualify to take the Exam outside the U.S., you will have to establish your eligibility through a jurisdiction participating in the international administration of the Exam. Jurisdictions who do not currently participate in the international administration of the Exam are listed below.

To test in an international location, you must first select a participating U.S. jurisdiction, contact the Board of Accountancy (or its designee) in that jurisdiction to obtain application materials, and submit a completed application and required fees as instructed. **After receiving the Notice to Schedule (NTS)**, you may then use the NTS to apply to take the Exam in an international location.

Qualified Uniform CPA Examination candidates in participating jurisdictions will have the option of testing at any international location where the CPA Exam is currently offered. Below is a list of all international locations offering the CPA Exam:

- Bahrain
- Bermuda
- Brazil
- Egypt
- England
- Germany
- India
- Ireland
- Israel
- Japan
- Jordan
- Kuwait
- Lebanon
- Nepal
- Philippines
- Republic of Korea
- Saudi Arabia
- Scotland
- United Arab Emirates



Scores for candidates testing at an international location are released on the same timeline as domestic scores.



Overall Statistics by Jurisdiction

Year-Quarter: 2024-Q3

Summary of Examination data for each Jurisdiction with fifteen* or more candidates.

Jurisdiction	Total Candidates	Total Exam Sections	Sections FT	Sections RE	Average Pass Rate	Average Score	Average Age
Alabama	377	463	298	165	47.3%	69.2	27.3
Alaska	1,175	1,374	931	443	50.7%	71.2	30.7
Arizona	475	572	378	194	50.0%	70.7	29.7
Arkansas	254	315	231	84	54.6%	71.8	26.9
California	5,040	6,031	4,004	2,027	49.7%	70.7	29.5
Colorado	552	671	469	202	52.3%	71.8	29.1
Connecticut	402	479	299	180	42.0%	69.4	27.1
Delaware	80	94	55	39	43.6%	69.0	33.0
District of Columbia	92	111	79	32	55.9%	73.1	28.1
Florida	1,458	1,751	1,183	568	54.1%	71.8	29.0
Georgia	927	1,082	697	385	44.7%	69.0	29.4
Guam	1,675	1,966	1,442	524	49.2%	70.5	28.8
Hawaii	110	132	89	43	43.2%	69.0	29.1
Idaho	154	193	141	52	49.2%	69.9	29.9
Illinois	1,705	2,168	1,581	587	52.8%	70.9	26.5
Indiana	527	701	490	211	50.6%	70.8	27.1
Iowa	289	371	246	125	55.8%	72.9	25.8
Kansas	88	103	67	36	55.3%	73.8	28.3
Kentucky	280	326	223	103	49.7%	70.0	27.5
Louisiana	325	391	247	144	44.8%	69.2	28.1
Maine	369	453	321	132	51.0%	71.1	32.9



Jurisdiction	Total Candidates	Total Exam Sections	Sections FT	Sections RE	Average Pass Rate	Average Score	Average Age
Maryland	398	464	297	167	46.1%	69.6	29.6
Massachusetts	912	1,106	775	331	50.3%	71.3	26.5
Michigan	685	808	525	283	45.0%	69.3	27.7
Minnesota	559	738	564	174	54.6%	71.7	26.0
Mississippi	222	285	186	99	50.5%	71.0	26.3
Missouri	639	817	559	258	49.4%	70.3	26.3
Montana	746	888	662	226	60.8%	74.0	29.1
Nebraska	138	183	144	39	63.4%	75.1	24.9
Nevada	223	274	171	103	47.1%	70.2	28.7
New Hampshire	222	261	129	132	43.3%	68.7	32.8
New Jersey	855	995	638	357	42.5%	68.0	28.2
New Mexico	72	78	53	25	37.2%	66.3	35.2
New York	3,819	4,615	2,990	1,625	47.8%	70.1	27.8
North Carolina	778	1,007	715	292	51.4%	71.5	27.5
North Dakota	262	307	233	74	47.2%	68.0	29.1
Ohio	964	1,177	834	343	47.2%	70.4	26.9
Oklahoma	318	402	292	110	46.0%	69.5	28.6
Oregon	231	289	212	77	51.2%	71.6	29.9
Pennsylvania	1,282	1,516	1,018	498	48.6%	69.6	27.4
Puerto Rico	193	211	115	96	41.2%	66.8	29.8
Rhode Island	72	85	54	31	41.2%	64.6	30.3
South Carolina	244	309	204	105	55.0%	71.2	28.1
South Dakota	53	64	48	16	46.9%	70.5	28.5



Jurisdiction	Total Candidates	Total Exam Sections	Sections FT	Sections RE	Average Pass Rate	Average Score	Average Age
Tennessee	627	775	538	237	46.6%	69.4	28.2
Texas	2,570	3,126	2,093	1,033	50.2%	70.7	28.8
Utah	354	430	321	109	61.9%	75.1	28.5
Vermont	81	105	62	43	47.6%	70.5	28.4
Virginia	947	1,158	762	396	47.2%	70.7	29.3
Washington	1,540	1,822	1,391	431	53.2%	71.9	31.2
West Virginia	74	85	46	39	44.7%	69.0	28.1
Wisconsin	423	535	404	131	59.1%	74.3	25.4
Wyoming	33	41	28	13	51.2%	68.5	29.8

**30 or more candidates is the cutoff for the annual performance report.*



Year-Quarter: 2024-Q3

Quarterly CPA Examination Report: Overall Performance - All

Jurisdiction: New York

	Exam Type			Exam Section					
	Overall	FT	RE	AUD	FAR	REG	BAR	ISC	TCP
Candidates	3,819	2,622	1,468	1,262	1,657	1,111	241	153	191
Sections	4,615	2,990	1,625	1,262	1,657	1,111	241	153	191
% Pass	47.8%	52.2%	39.6%	46.2%	36.8%	62.1%	43.2%	54.2%	70.7%
Average Score	70.1	70.9	68.7	71.0	65.0	74.8	69.8	75.0	77.8
Average Age	27.8	26.9	29.5	27.9	27.3	27.6	29.3	28.5	31.0

Jurisdiction Ranking

31

Overall Pass Rate

32

Overall Avg. Score

33

Core Pass Rate

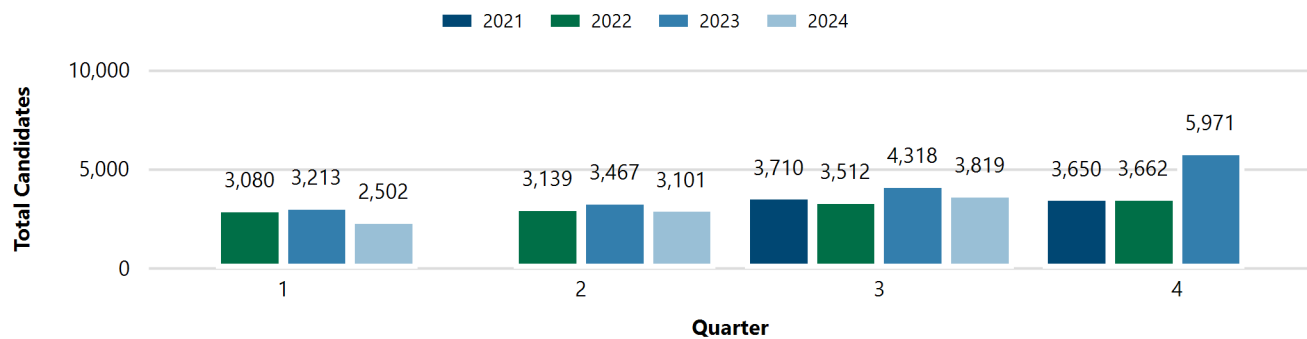
31

Discipline Pass Rate

	Gender			Residency			Cohort Year				Age at Time of Examination					
	F	M	U	In-State	Out-of-State	Int'l	2024	2023	2022	2021	<22	22-23	24-25	26-27	28-29	30+
Candidates	1,698	1,980	141	2,344	947	528	913	408	121	55	101	1,054	727	514	376	1,082
Sections	2,035	2,411	169	2,808	1,173	634	1,070	506	143	67	127	1,330	840	599	437	1,281
% Pass	43.4%	51.0%	53.3%	46.1%	52.1%	47.2%	43.7%	55.1%	38.5%	46.3%	58.3%	54.1%	43.8%	47.7%	45.1%	43.6%
Average Score	68.6	71.3	71.3	69.5	71.4	70.5	67.2	72.1	68.2	70.1	74.8	71.7	68.5	70.2	69.3	69.2
Average Age	28.3	27.6	25.8	27.8	26.5	30.5	25.8	26.5	27.6	27.9	21.0	22.6	24.4	26.5	28.5	36.7

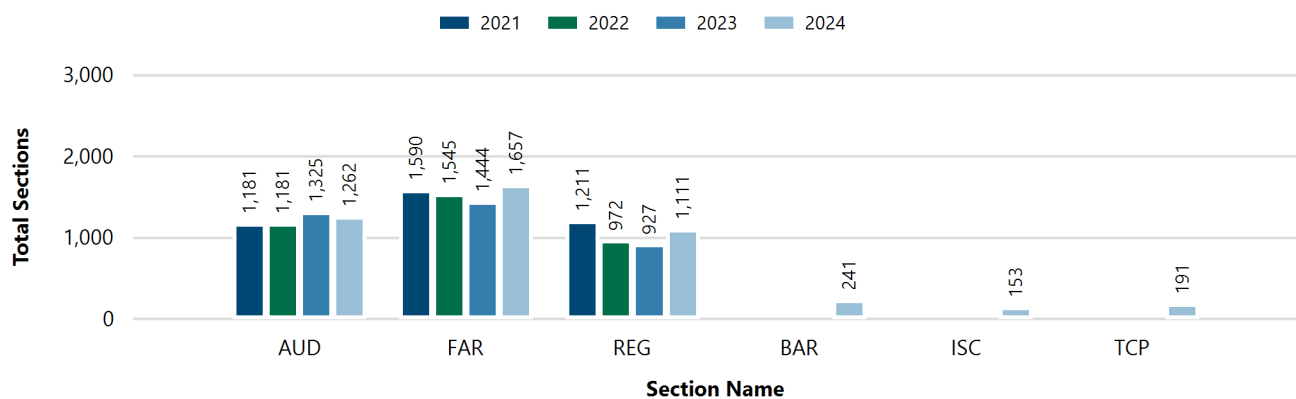
Total Candidates by Quarter

Number of unique candidates per quarter who have taken at least one section of the Examination.



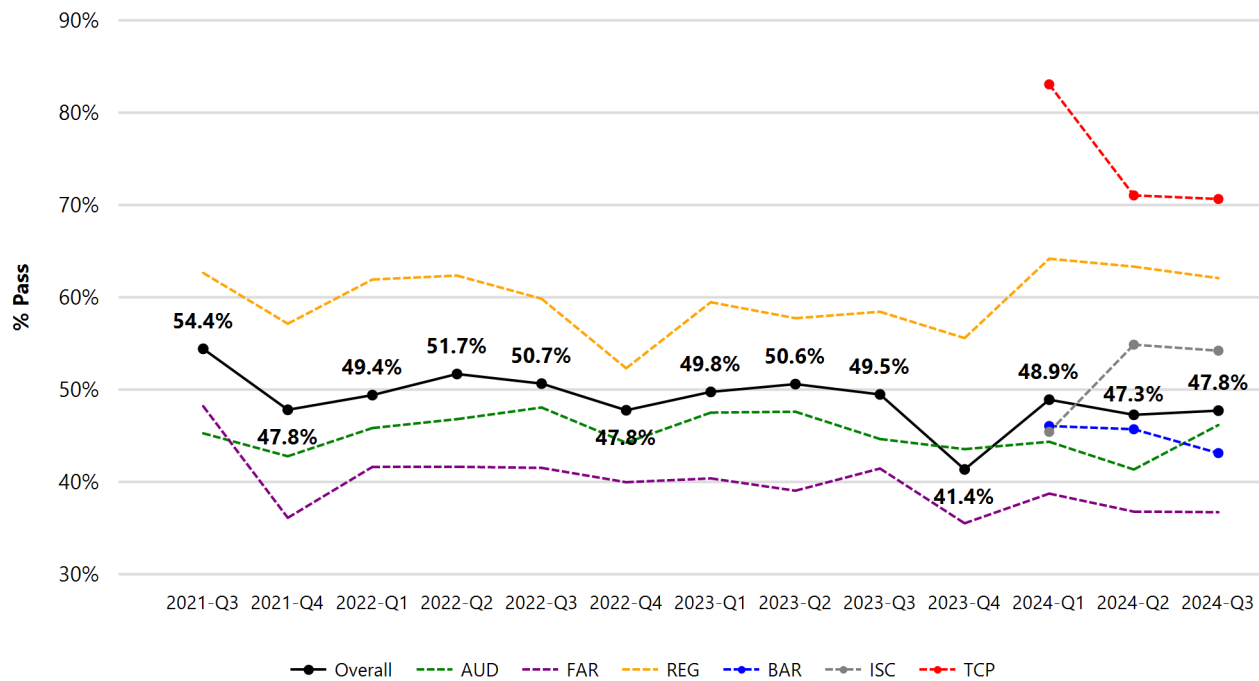
Total Sections by Section Type*

The total of Examination sections for which candidates received scores in the current quarter and the same quarter over the past 4 years.



% Pass

The percentage of sections that were passed in each quarter for the past three years. AUD, FAR and REG after 2023 represent the new core sections.

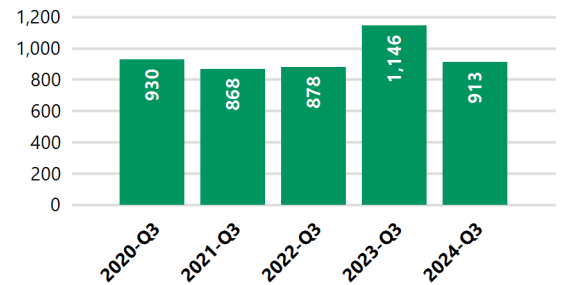


Year-Quarter	Overall Pass Rate	AUD	FAR	REG	BAR	ISC	TCP
2024-Q3	47.8%	46.2%	36.8%	62.1%	43.2%	54.2%	70.7%
2024-Q2	47.3%	41.4%	36.8%	63.4%	45.7%	54.9%	71.1%
2024-Q1	48.9%	44.4%	38.8%	64.2%	46.1%	45.5%	83.1%
2023-Q4	41.4%	43.6%	35.5%	55.6%	-	-	-
2023-Q3	49.5%	44.7%	41.5%	58.5%	-	-	-
2023-Q2	50.6%	47.6%	39.1%	57.8%	-	-	-
2023-Q1	49.8%	47.5%	40.4%	59.5%	-	-	-
2022-Q4	47.8%	44.3%	40.0%	52.3%	-	-	-
2022-Q3	50.7%	48.1%	41.6%	59.9%	-	-	-
2022-Q2	51.7%	46.8%	41.7%	62.4%	-	-	-
2022-Q1	49.4%	45.9%	41.7%	62.0%	-	-	-
2021-Q4	47.8%	42.8%	36.1%	57.2%	-	-	-
2021-Q3	54.4%	45.3%	48.2%	62.7%	-	-	-

Quarterly CPA Examination Report: Overall Performance - First Time Jurisdiction: New York

	Exam Type			Exam Section					
	Overall	FT	RE	AUD	FAR	REG	BAR	ISC	TCP
Candidates	2,622	2,622	-	718	1,014	759	193	128	178
Sections	2,990	2,990	-	718	1,014	759	193	128	178
% Pass	52.2%	52.2%	-	52.1%	39.7%	66.1%	40.9%	57.8%	71.9%
Average Score	70.9	70.9	-	71.7	65.0	75.9	69.1	75.5	77.9
Average Age	26.9	26.9	-	26.3	26.2	26.8	29.1	28.1	30.6

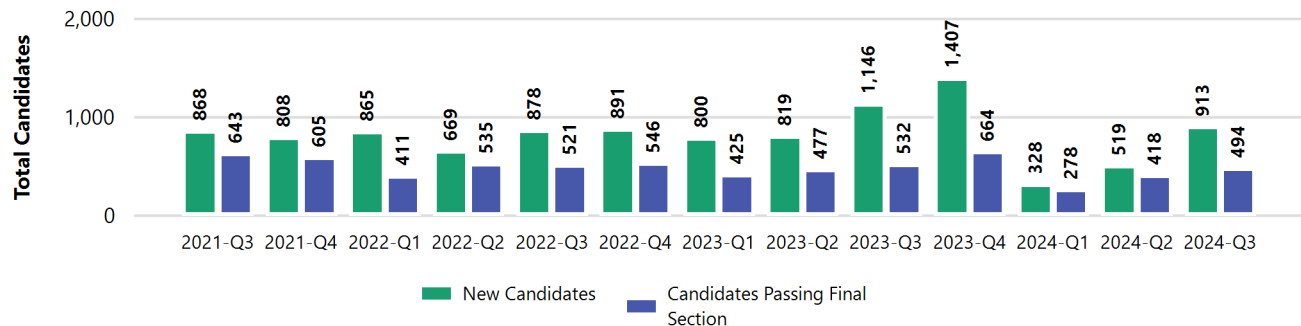
Cohort Size Trend



	Gender			Residency			Cohort Year				Age at Time of Examination					
	F	M	U	In-State	Out-of-State	Int'l	2024	2023	2022	2021	<22	22-23	24-25	26-27	28-29	30+
Candidates	1,113	1,389	120	1,612	645	365	913	273	41	21	100	882	482	311	228	636
Sections	1,259	1,593	138	1,825	768	397	1,070	305	44	22	125	1,065	526	335	240	698
% Pass	47.5%	55.6%	55.8%	49.8%	58.9%	50.1%	43.7%	59.3%	52.3%	54.5%	59.2%	57.2%	46.0%	51.9%	47.9%	49.4%
Average Score	69.2	72.1	71.9	70.0	73.0	71.0	67.2	73.0	69.2	74.5	74.9	72.5	68.6	70.3	69.5	70.2
Average Age	27.4	26.6	26.0	26.9	25.5	29.9	25.8	26.5	29.0	28.8	21.0	22.5	24.4	26.5	28.4	36.4

New Candidates vs. Candidates Passing Final Section

The number of new unique candidates taking their very first Examination section versus the total number of unique candidates who passed their fourth and final section in a quarter.



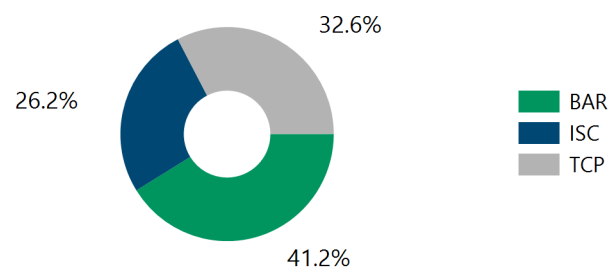
Degree Type

Highest degree listed for a candidate

	Candidates	% Total
Bachelor's Degree	2,212	57.9%
Advanced Degree	685	17.9%
Enrolled / Other	922	24.1%

Disciplines

Breakdown of what percentage of candidates are taking which disciplines



Notes

1. The data used to develop this report was pulled from NASBA's Gateway System, which houses the Uniform CPA Examination's Application and Performance information for all 55 jurisdictions.
2. The demographic data related to age, gender, and degree type is provided by the individual candidates and may not be 100% accurate.
3. Some jurisdictions do not require candidates to report certain demographic data nor complete surveys gathering such data on a voluntary basis.
4. A cohort is the year in which a candidate enters the CPA Exam pipeline. The candidate's cohort is determined by the very first section attempt on the CPA Examination.
5. The CPA Exam introduced a new Exam on January 1, 2024. AUD, FAR, and REG after 2023 represent the new core sections.

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MISSION DRIVEN - MEMBER FOCUSED

NASBA Annual Meeting Innovate, Collaborate, Succeed

Sunday, October 27, 2024

8:00 a.m. – 2:00 p.m.	Golf Outing	
3:00 – 5:00 p.m.	Registration	Bonnet Creek Foyer
3:30 – 5:30 p.m.	CPT Ethics Workshop Ethics: Every Choice has a Consequence Chuck Gallagher, CSP Business Ethics Expert	Bonnet Creek VII-IX
6:00 – 8:00 p.m.	Welcome Reception	Waterside Patio & Green

Monday, October 28, 2024

7:30 – 8:30 a.m.	Communications Breakfast	La Luce
8:00 – 9:00 a.m.	Breakfast (All Welcome)	Bonnet Creek VII-IX

9:00 – 11:00 a.m.	Opening Plenary Session	Bonnet Creek I-VI
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9:00 – 9:20 a.m.	Call to Order and Introductions Stephanie M. Saunders, CPA 2023-2024 Chair, NASBA
9:20 – 9:30 a.m.	Welcome to Orlando Brent Sparkman, CPA Chair, Florida Board of Public Accountancy
9:30 – 10:30 a.m.	Private Equity Investment in Public Accounting Firms Matthew Boshier, Esq. Hunton Andrews Kurth LLP
10:30 – 10:45 a.m.	A Year in Review: Report from NASBA Chair Stephanie M. Saunders, CPA 2023-2024 Chair, NASBA
10:45 – 11:00 a.m.	The Latest Developments from the AICPA: A Report from the AICPA Chair Carla McCall, CPA 2024-2025 Chair, AICPA

Monday, October 28, 2024

11:00 – 11:15 a.m.	BREAK	
11:15 a.m. – 12:30 p.m.	The Hero Effect® - Being Your Best When It Matters the Most Kevin Brown, Keynote Address	Bonnet Creek VII-IX
12:30 – 1:30 p.m.	Luncheon	Bonnet Creek VII-IX
1:45 – 4:30 p.m.	Afternoon Plenary Session	Bonnet Creek I-VI
1:45 – 2:45 p.m.	UAA & Competency-Based Experience Pathway Update Nicola Neilon, CPA Chair, NASBA Uniform Accountancy Act Committee Kent A. Absec Vice President, State Board Relations, NASBA	
2:45 – 3:00 p.m.	BREAK	
3:00 – 4:00 p.m.	The Future of the Accounting Profession Barry C. Melancon CPA, CGMA President & CEO, AICPA	Bonnet Creek I-VI
4:00 – 4:30 p.m.	Growth in Ethics: A Report from the NASBA Center for the Public Trust Sedrik Newbern President, NASBA Center for the Public Trust Chief Ethics Officer, NASBA	
4:30 – 5:30 p.m.	CPT Fundraiser Event	Signature Island

Tuesday, October 29, 2024

7:30 – 8:00 a.m.	Regional Breakfasts	
8:00 – 9:30 a.m.	Regional Breakout Meetings	
8:00 – 9:30 a.m.	Breakfast for Other Attendees	Bonnet Creek VII-IX

Tuesday, October 29, 2024

9:40 am – 12:00 p.m.	Morning Plenary Session	Bonnet Creek I-VI
9:40 – 11:15 a.m.	<p>Annual Business Meeting Minutes of the 116th Annual Meeting Nicola Neilon, CPA Secretary</p> <p>NASBA Awards W. Michael Fritz, CPA Chair, NASBA Awards Committee</p> <p>Election of NASBA Board Members Richard N. Reisig, CPA Chair, NASBA Nominating Committee</p> <p>Bylaws Committee Report Jason D. Peery, CPA Bylaws Committee Chair</p> <p>Administration & Finance Committee Report J. Andy Bonner, Jr., CPA, CGMA Treasurer</p> <p>Audit Committee Report Laurie A. Warwick, CPA Chair, NASBA Audit Committee</p>	
11:15 a.m. – 12:00 p.m.	<p>The State of NASBA Daniel J. Dustin, CPA President and CEO, NASBA</p>	
12:00 – 12:15 p.m.	First Meeting of 2024-25 NASBA Board of Directors	Julliard Complex – 5th Floor
12:15 – 1:30 p.m.	Luncheon	Bonnet Creek VII-IX
1:30 – 4:00 p.m.	Afternoon Plenary Session	Bonnet Creek I-VI
1:30 – 2:30 p.m.	<p>Inaugural Presentations Acknowledgements & Gratitude Stephanie M. Saunders, CPA 2023-2024 Chair, NASBA</p> <p>Inaugural Address Maria E. Caldwell, CPA 2024-2025 Chair, NASBA</p>	

Tuesday, October 29, 2024 continued

2:30 – 3:00 p.m.	Audit Talent and Artificial Intelligence Christina Ho, CPA Member, PCAOB	
3:00 – 3:15 p.m.	BREAK	Bonnet Creek Foyer
3:15 – 3:45 p.m.	The CPA Exam: A Report on Progress Colleen K. Conrad, CPA Executive Vice President and COO, NASBA Michael A. Decker Vice President – CPA Examination and Pipeline – Public Accounting, AICPA	Bonnet Creek I-VI
3:45 – 4:15 p.m.	Experience Learn and Earn (ELE) Kent A. Absec Vice President, State Board Relations, NASBA Lindsey Yopp Lead Manager - CPA Pipeline, AICPA	
4:15 p.m.	RECESS	
6:30 p.m.	NASBA Luau Extravaganza	Sea World's Discovery Cove

Wednesday, October 30, 2024

8:00 – 9:15 a.m.	State Board President & Chair Breakfast Meeting Moderator: Maria E. Caldwell, CPA 2024-2025 Chair, NASBA	La Luce
8:00 – 9:15 a.m.	Executive Director & State Board Staff Breakfast Meeting Moderator: Nancy Glynn, CPA Executive Director, Virginia Board of Accountancy 2024-2025 Chair, NASBA Executive Directors Committee	Zeta Bar
8:00 – 9:15 a.m.	Breakfast (All Welcome)	Bonnet Creek VII-IX
9:15 – 11:50 a.m.	Morning Plenary Session	Bonnet Creek VII-IX
9:15 – 10:15 a.m.	AI Revolution: Unlocking the Future of Tomorrow Chuck Gallagher, CSP Business Ethics Expert, AI Keynote	

Wednesday, October 30, 2024 continued

10:15 – 10:45 a.m.	A Deeper Look: Texas Candidate Exam Performance by Large & Small Accounting Programs Charles R. Thomas, Jr., PhD, CMA, CGMA (inactive), CPA Professor, Tarleton State University
10:45 – 11:15 a.m.	Legislative Trends Affecting Boards of Accountancy: What You Need to Know John W. Johnson Vice President, Legislative and Governmental Affairs, NASBA
11:15 – 11:30 a.m.	Relying on the CPA Exam: A Report from the CPA Examination Review Board Faye D. Miller, CPA Chair, CPA Examination Review Board
11:30 – 11:45 a.m.	Questions for NASBA Leadership Maria E. Caldwell, CPA 2024-2025 Chair, NASBA Daniel J. Dustin, CPA President and CEO, NASBA
11:45 – 11:50 a.m.	Closing Remarks on the 2024 Annual Meeting Invitation to 2025 Annual Maria E. Caldwell, CPA 2024-2025 Chair, NASBA
11:50 a.m. – 12:00 p.m.	Final Recap
12:00 p.m.	ADJOURN