



September 30, 2022

AICPA

Via practiceanalysis@aicpa.org

Re: Exposure Draft: Maintaining the Relevance of the Uniform CPA Examination® -
Aligning the Exam with the CPA Evolution Licensure Model

The Exam Exposure Draft Committee (the “Committee” or “we”) of the Indiana CPA Society (INCPAS) appreciates the opportunity to comment on the AICPA’s proposed Uniform CPA Examination Blueprints. We value the informed and thoughtful proposal brought forth in the AICPA’s Uniform CPA Examination Exposure Draft (ED). The Exam Exposure Draft Committee (the “Committee” or “we”) is a stakeholder committee comprised of accounting educators, CPAs currently supervising new licensees, and existing CPA candidates. These comments and recommendations represent the positions of the Committee rather than any individual members of the Committee, the organizations with which such members are associated or the INCPAS Board.

Maintaining the relevance of the Uniform CPA Examination while also aligning the Exam with the CPA Evolution licensure model is critical as the Exam serves as a crucial component of the licensing process. Licensees throughout the 55 licensing jurisdictions use the Exam as a means of assurance that they have the minimum knowledge and skills necessary to protect the public interest in today’s business and financial environment, and the rigor and integrity of the Examination process – the Exam itself - is crucial.

Overall, the Committee feels the Core Exam and each Discipline Exam includes the knowledge and skills required of newly licensed CPAs to protect the public interest. The Committee supports the AICPA’s and NASBA’s efforts to evolve the CPA licensure model to recognize the rapidly changing skills and competencies the profession requires today and moving forward, namely critical thinking, problem-solving, analytical ability, professional skepticism, and research. Further, the embedding of data and technology in all Core and Discipline Exam sections, the committee feels, is reflective of the current environment newly licensed CPAs are working in. Finally, moving from the current structure of four exams to a core-and-discipline approach will allow for increased flexibility, and gives CPA Candidates the opportunity to sit for a discipline that is more relevant to areas of practice they intend to work within.

The Committee’s primary concern, relating to the content of the Exam, stem from the breakdown of skills levels within both the FAR-Core and ISC – Discipline sections. The Blueprint, compared to the current Exam, recommends a decrease in the number of Analysis level questions within the FAR-Core; the ISC – Discipline skill level is disproportionately heavy in the Remembering and Understanding Skill Level. These task levels, we feel, do not align with the need to evaluate a candidate’s critical thinking, problem-solving, analytical ability, professional skepticism, and research skills. Further, removal of written communication item previously found in BEC, seems in conflict with the practice analysis recommendation to increase focus on testing high order skills

Further Consideration & Comments

While, overall, the Committee feels the Exam Blueprint is inclusive in knowledge and skills assessments that ensure safeguarding the public interest. In addition to the revised licensure model and evolving Exam, we would suggest the AICPA also consider changes and enhancements related to

resources, access, and reputation management as it relates to increasing/maintaining a strong talent pipeline.

Resources

- We are not convinced students/candidates sitting for the Exam currently possess the experience to determine which domain/body of knowledge will be most applicable in their future career trajectory. In conjunction with the new Exam, the Committee urges the AICPA/NASBA to consider changes to the internship model as it is a reasonable way students can better identify future career interest. Efforts to help students and academia deploy successful, meaningful internship opportunities will be critical to the success of the new model.
- We agree that nICPAs must develop an increased digital acumen for success in today's environment. Learning these concepts and skills is crucial to the public interest. However, we are concerned that academia does not have the resources necessary to teach these skill sets that are to be embedded throughout the Core and Discipline Exams.
 - Educators expressed grave concerns as it relates to integrating the mounting technology curriculum into an already crammed curriculum.
 - Educators need access to tools and data sets to teach these concepts. We encourage the AICPA and others to provide increased, easy access to software and datasets that would help students learn these concepts.

Access

- As the CPA profession continues to be challenged by the complexities of the talent pipeline and the need for talent, it would be helpful if the AICPA would develop a comprehensive, national pipeline strategy resulting in a cohesive coalition of diverse stakeholders (e.g. state societies, NABA, ALPFA, Ascend, Colleges & Universities, state boards, etc.) Just as the CPA Evolution initiative aims to recognize the rapidly changing skills and competencies needed in the profession, the AICPA and others must develop resources and be prepared to communicate opportunities in the profession with students.
 - A comprehensive strategy should include a critical look at all existing barriers to entry into the profession. These barriers should take into consideration demographic diversities (e.g. race, gender, finances, etc.).

Reputation Management

- The CPA profession needs a new narrative; misconceptions surrounding the career opportunities and the skillsets held by CPAs is hurting recruiting efforts.
- Additionally, the stereotypes and public image do not align with the reality of the profession. We need to change the story, just as we change the Exam; the AICPA and other stakeholders must prioritize telling the CPA of today's story: debunking stereotypes, helping students see how they can help their communities and use emerging technologies to help their communities/businesses thrive. Just as technology is being embedded in the new Exam, a concerted effort to show students how these interests and lead to a fulfilling career as a CPA.

Thank you for allowing us to respond to this Exposure Draft.

Sincerely,



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