

April 26, 2022

Indiana Board of Accountancy
Indiana Professional Licensing Agency

Via email to Toby Snell

Re: LSA # 22-93 NOI Exam changes and 120 to Sit Rule Draft: Comments for Public Hearing



Dear Chairman Barton and Members of the Indiana Board of Accountancy:

As President and CEO of the Indiana CPA Society I would like to formally offer our support for rule changes outlined in LSA document # 22-93. Joining me in support are members of our Government Relations Advisory Council. GRAC members volunteer their time and expertise to develop, monitor and respond to legislation, regulation, or rules affecting the CPA profession.

We believe changes proposed in LSA document # 22-93 will have a positive, long-term effect on the profession. As we collaborate with Indiana's leading CPAs, we repeatedly hear about challenges in recruiting and retaining skilled talent. Amid rising consumer demand and increasingly rigorous regulatory compliance, a skilled profession pipeline is critical. By allowing students to sit for the Uniform CPA Exam with 120 college credit hours – while still maintaining 150 hours for licensure – we remove one obstacle without compromising on rigor. As an added benefit, Indiana becomes a more attractive, competitive environment for entry-level professionals as it brings Indiana in line with surrounding states and 46 of the 55 jurisdictions who already allow candidates to sit at 120 hours.

In addition to draft changes related requirements to sit for the Exam, LSA # 22-93 includes other important updates we also support. Of note are amendments aiming to:

- *remove references to Exam windows reflects a candidate's ability to continuously sit throughout the year.* Not only does this allow more opportunity to sit, it allows a candidate to retake failed sections quicker than previously allowed.
- *realign tested skills with the evolving, entry-level skills necessary for today's CPA.* By removing Exam section names, Indiana is prepared for upcoming changes to the Exam structure outlined by the American Institute of CPAs and the National Association of State Boards of Accountancy.
- *update Indiana's rule with current information, the Uniform Accountancy Act Model Rules, and with Indiana rule protocols.* Several technical changes, such as the list of accreditation organizations in 872 IAC 1-1-6.3, accepted colleges, universities and degrees, that need revised to reflect practices.

The Indiana CPA Society is a statewide professional association representing nearly 7,000 CPAs and accounting professionals who are transforming business in Indiana. We appreciate the impact board members have demonstrated in drafting this rule and in the efforts to support the pipeline of future CPAs in Indiana.

Sincerely,

A handwritten signature in black ink that reads "Courtney J. Kincaid". The signature is written in a cursive, flowing style.

Courtney J. Kincaid, CAE, IOM
President & CEO