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COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF STATE  
BUREAU OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS

**F I N A L M I N U T E S**

MEETING OF:

**STATE BOARD OF ACCOUNTANCY**

TIME: 10:30 A.M.

Held at

**PENNSYLVANIA DEPARTMENT OF STATE**

2525 North 7th Street

CoPA HUB, Eaton Conference Room

Harrisburg, Pennsylvania 17110

as well as

**VIA MICROSOFT TEAMS**

June 21, 2024

State Board of Accountancy  
June 21, 2024

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BOARD MEMBERS:

- Sheri L. Risler, CPA, Chair
- Matthew Eaton, Director of Operations, Bureau of Professional and Occupational Affairs, on behalf of Arion R. Claggett, Acting Commissioner
- Keri A. Ellis, CPA - Absent
- Monique M. Ericson, CPA, Office of Attorney General
- John J. Grater, CPA
- Benjamin Holland, CPA
- Charles A. O'Brien, CPA
- Michael D. Ocker, CPA, Vice Chair
- John Petchel, Public Member

BUREAU PERSONNEL:

- Shana M. Walter, Esquire, Senior Board Counsel
- Ronald K. Rouse, Esquire, Board Counsel
- Ashley P. Murphy, Esquire, Board Prosecution Liaison
- Timothy A. Fritsch, Esquire, Board Prosecutor
- Miranda Murphy, Board Administrator
- Marc Farrell, Esquire, Regulatory Counsel, Office of Chief Counsel, Department of State
- Andrew LaFratte, MPA, Deputy Policy Director, Department of State

ALSO PRESENT:

- Jennifer Cryder, CPA, MBA, Chief Executive Officer, Pennsylvania Institute of Certified Public Accountants
- Mark Koscinski, Assistant Professor of Accounting Practice, Moravian University
- Joseph Wincovitch, Revenue Tax Audit Program Administrator, Pennsylvania Department of Revenue
- Emily Cowfer, Sargent's Court Reporting Service, Inc.

1 \*\*\*

2 State Board of Accountancy

3 June 21, 2024

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5 [Pursuant to Section 708(a)(5) of the Sunshine Act,  
6 at 9:00 a.m. the Board entered into Executive Session  
7 with Ronald K. Rouse, Esquire, Board Counsel, to have  
8 attorney-client consultations and for the purpose of  
9 conducting quasi-judicial deliberations. The Board  
10 returned to open session at 10:30 a.m.]

11 \*\*\*

12 [Ronald K. Rouse, Esquire, Board Counsel, informed  
13 everyone the meeting of the State Board of  
14 Accountancy was being held in a hybrid format by in-  
15 person and livestream teleconference pursuant to Act  
16 100 of 2021, which requires boards to use a virtual  
17 platform to conduct business when a public meeting is  
18 held. He noted the meeting was being recorded and  
19 voluntary participation constituted consent to be  
20 recorded.

21 Mr. Rouse also noted the Board entered into  
22 Executive Session with Board Counsel to have  
23 attorney-client consultations and for the purpose of  
24 conducting quasi-judicial deliberations.]

25 \*\*\*

1           The State Board of Accountancy Meeting was held  
2 on Friday, June 21, 2024. Sheri L. Risler, CPA,  
3 Chair, called the meeting to order at 10:30 a.m.

4                                   \*\*\*

5 Roll Call

6 [Sheri L. Risler, CPA, Chair, requested a roll call  
7 of Board members. A quorum was present.]

8                                   \*\*\*

9 Introduction of Attendees

10 [Sheri L. Risler, CPA, Chair, also requested an  
11 introduction of attendees.]

12                                  \*\*\*

13 Approval of Minutes

14 [The April 19, 2024 State Board of Accountancy Board  
15 Meeting Minutes were tabled until the next meeting.]

16                                  \*\*\*

17 [Sheri L. Risler, CPA, Chair, exited the meeting at  
18 10:39 a.m. for recusal purposes.]

19                                  \*\*\*

20                                   VICE CHAIR OCKER ASSUMED THE CHAIR

21                                  \*\*\*

22 Report of Prosecutorial Division

23 [Timothy A. Fritsch, Esquire, Board Prosecutor,  
24 presented the Consent Agreement for Case No. 22-55-  
25 015866.]

1 MR. ROUSE:

2 Did the Board members have any other  
3 questions?

4 Regarding the Consent Agreement at  
5 item 2 on the agenda, Case No. 22-55-  
6 015866, after discussion in Executive  
7 Session, I believe the Vice Chair would  
8 entertain a motion to adopt the Consent  
9 Agreement.

10 VICE CHAIR OCKER:

11 Is there a motion to adopt the Consent  
12 Agreement at item 2 on the agenda, Case No.  
13 22-55-015866?

14 MR. HOLLAND:

15 So moved.

16 VICE CHAIR OCKER:

17 Is there a second?

18 MR. GRATER:

19 Second.

20 VICE CHAIR OCKER:

21 Any discussion? Roll call.

22

23 Petchel, aye; Ocker, aye; O'Brien, aye;  
24 Holland, aye; Grater, aye; Ericson, aye;  
25 Eaton, aye.

1 [The motion carried. Sheri Risler recused herself  
2 from deliberations and voting on the motion. That is  
3 the Matter of BPOA v. Michael Read Wolf, Case No. 22-  
4 55-015866.]

5 \*\*\*

6 [Sheri L. Risler, CPA, Chair, reentered the meeting  
7 at 10:42 a.m.]

8 \*\*\*

9 CHAIR RISLER RESUMED THE CHAIR

10 \*\*\*

11 Report of Prosecutorial Division

12 [Timothy A. Fritsch, Esquire, Board Prosecutor,  
13 presented the Consent Agreement for Case No. 22-55-  
14 017875.]

15 MR. ROUSE:

16           Regarding the Consent Agreement at item 3  
17           on the agenda, Case No. 23-55-017875, after  
18           discussion in Executive Session, I believe  
19           the Chair would entertain a motion to adopt  
20           the Consent Agreement.

21 CHAIR RISLER:

22           Is there a motion to adopt the Consent  
23           Agreement at item 3 on the agenda, Case No.  
24           23-55-017875?

25 MR. HOLLAND:

1 So moved.

2 CHAIR RISLER:

3 Second?

4 MR. GRATER:

5 Second.

6 CHAIR RISLER:

7 Is there any discussion? Roll call,  
8 please.

9

10 Petchel, aye; Ocker, aye; O'Brien, aye;  
11 Holland, aye; Grater, aye; Ericson, aye;  
12 Eaton, aye; Risler, aye.

13 [The motion carried unanimously. That is the Matter  
14 of Agravante & Gentile CPAs LLP, Case No. 23-55-  
15 017875.]

16

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17 Report of Board Counsel - Motion to Deem Facts

18 Admitted and Enter Default

19 MR. ROUSE:

20 Item 4 on the agenda is a Motion to Deem  
21 Facts Admitted and Enter Default in the  
22 Matter of BPOA v. John M. Cipriani and  
23 Cipriani & Associates LLC, Case Nos. 21-55-  
24 013602 & 23-55-011531.

25 After discussion in Executive Session,

1 I believe the Chair would entertain a  
2 motion to grant the Motion to Deem Facts  
3 Admitted and to direct Board Counsel to  
4 prepare an Adjudication and Order in  
5 accordance with the discussion in Executive  
6 Session.

7 CHAIR RISLER:

8 In the Matter of BPOA v. John M. Cipriani  
9 and Cipriani & Associates LLC, Case Nos.  
10 21-55-013602 & 23-55-011531, at item 4 on  
11 the agenda, is there a motion to grant the  
12 Motion to Deem Facts Admitted and to direct  
13 Board Counsel to prepare the Adjudication  
14 and Order in accordance with the discussion  
15 in Executive Session?

16 MR. HOLLAND:

17 So moved.

18 CHAIR RISLER:

19 Second?

20 MR. GRATER:

21 Second.

22 CHAIR RISLER:

23 Is there any discussion? Roll call,  
24 please.

25



1 Petchel, aye; Ocker, aye; O'Brien, aye;  
2 Holland, aye; Grater, aye; Ericson, aye;  
3 Eaton, aye; Risler, aye.

4 [The motion carried unanimously.]

5 \*\*\*

6 Report of Board Counsel - Final Adjudication and  
7 Order

8 MR. ROUSE:

9 Item 5 on the agenda is the Final  
10 Adjudication and Order in the Matter of  
11 BPOA v. James V. Bouarouy, CPA, Case No.  
12 22-55-016351.

13 I believe the Chair would entertain a  
14 motion to adopt the Adjudication and Order  
15 as presented by Board Counsel and to direct  
16 Board Counsel to prepare the Board's Final  
17 Order.

18 CHAIR RISLER:

19 In the Matter of BPOA v. James V. Bouarouy,  
20 CPA, Case No. 22-55-016351 at item 5 on the  
21 agenda, is there a motion to adopt the  
22 Adjudication and Order as presented by  
23 Board Counsel and to direct Board Counsel  
24 to prepare the Board's Final Order?

25 MR. HOLLAND:

1                   So moved.

2 CHAIR RISLER:

3                   Second?

4 MR. GRATER:

5                   Second.

6 CHAIR RISLER:

7                   Any discussion? Roll call.

8

9                   Petchel, aye; Ocker, aye; O'Brien, aye;

10                  Holland, aye; Grater, aye; Ericson, aye;

11                  Eaton, aye; Risler, aye.

12 [The motion carried unanimously.]

13

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14 Review of Program Sponsor Applications

15 MR. ROUSE:

16                  Item 12 on the agenda is Bechtel Plant  
17                  Machinery, Inc. This was a matter that was  
18                  reviewed in Executive Session.

19                  I believe the Chair would entertain a  
20                  motion to grant the Program Sponsor  
21                  Application of Bechtel Plant Machinery,  
22                  Inc., at item 12 on the agenda.

23 CHAIR RISLER:

24                  Is there a motion to grant the Program  
25                  Sponsor Application of Bechtel Plant

1                   Machinery, Inc., at item 12 on the agenda?

2 MR. HOLLAND:

3                   So moved.

4 MR. GRATER:

5                   Second.

6 CHAIR RISLER:

7                   Any discussion? Roll call, please.

8

9                   Petchel, aye; Ocker, aye; O'Brien, aye;

10                  Holland, aye; Grater, aye; Ericson, aye;

11                  Eaton, aye; Risler, aye.

12 [The motion carried unanimously.]

13

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14 Review of Requests - Waiver of CPE Total of 80

15       Credits - Denied, for Ratification

16 MR. ROUSE:

17                  Item 13 on the agenda is the Waiver of CPE

18                  Total of 80 Credits - Denied, for

19                  Ratification.

20                  I believe the Chair would entertain a

21                  Motion to Ratify the Denial of the Request

22                  to Waive the 80-CPE Credit Requirement for

23                  Eric Killian at item 13 on the agenda.

24 CHAIR RISLER:

25                  Is there a motion to Ratify the Denial of

1 the Request to Waive the Requirement of a  
2 Total of 80 CPE Credits for Eric Killian at  
3 item 13 on the agenda?

4 MR. HOLLAND:

5 So moved.

6 MR. GRATER:

7 Second.

8 CHAIR RISLER:

9 Discussion? Roll call.

10

11 Petchel, aye; Ocker, aye; O'Brien, aye;  
12 Holland, aye; Grater, aye; Ericson, aye;  
13 Eaton, aye; Risler, aye.

14 [The motion carried unanimously.]

15

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16 Review of Requests - Extension of Time to Complete  
17 CPE - Approved, for Ratification

18 MR. ROUSE:

19 Item 14 on the agenda is the Extension of  
20 Time to Complete CPE - Approved, for  
21 Ratification for Meghan McDougall.

22 I believe the Chair would entertain a  
23 Motion to Ratify the Extension of Time to  
24 Complete CPE for Meghan McDougall at item  
25 14 on the agenda.

1 CHAIR RISLER:

2           Is there a motion to Ratify the Extension  
3           of Time to Complete CPE for Meghan  
4           McDougall at item 14 on the agenda?

5 MR. HOLLAND:

6           So moved.

7 MR. GRATER:

8           Second.

9 CHAIR RISLER:

10           Any discussion? Roll call.

11

12           Petchel, aye; Ocker, aye; O'Brien, abstain;  
13           Holland, aye; Grater, aye; Ericson, aye;  
14           Eaton, aye; Risler, aye.

15 [The motion carried. Charles O'Brien abstained from  
16 voting on the motion.]

17

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18 Report of Board Counsel - Regulations

19 [Ronald K. Rouse, Esquire, Board Counsel, provided a  
20 Regulatory Report for the Board's review. He noted  
21 the Board has Regulation 16A-5517 regarding licensure  
22 by endorsement and Regulation 16A-5519 regarding  
23 general revisions.

24           Mr. Rouse referred to Regulation 16A-5517 and  
25 noted prior Board discussion and concern at the last

1 Board meeting regarding Certified Public Accountants'  
2 (CPA) mobility with all of the different options  
3 available to people trying to practice in  
4 Pennsylvania.

5 Mr. Rouse addressed licensure by examination  
6 that requires, under the CPA Law and regulations, a  
7 person to be at least 18 years old, be of good moral  
8 character, have a bachelor's degree or higher, and to  
9 have completed at least 150 semester credits of  
10 postsecondary education in certain subject areas as  
11 well as complete one year of experience.

12 Mr. Rouse also noted under the Board's statute  
13 under the CPA Law that there is also licensure by  
14 domestic reciprocity, where a person has to be at  
15 least 18 years of age, must be of good moral  
16 character, must have passed the examination  
17 requirements to practice as a CPA under the laws of  
18 their state, and must meet continuing education  
19 requirements and the experience requirements.

20 Mr. Rouse noted the issue of CPA mobility was  
21 discussed at the last Board meeting. He further  
22 noted it is called "practice under substantial  
23 equivalency" under the CPA Law, where a person who is  
24 licensed in another jurisdiction practicing public  
25 accounting can work in the Commonwealth without

1 obtaining a certificate issued by the Board. He  
2 explained that the individual must have a valid  
3 certificate or right to practice public accounting  
4 from another state whose requirements are  
5 substantially equivalent to the Commonwealth to  
6 practice under substantial equivalency.

7 Mr. Rouse addressed determining whether another  
8 state's requirements are substantially equivalent to  
9 Pennsylvania, noting the 150 credits required for  
10 postsecondary education must be adhered to because  
11 their CPA law states that the Board looks toward the  
12 National Association of State Boards of Accountancy  
13 (NASBA) to determine substantial equivalency.

14 Mr. Rouse explained that licensure by  
15 endorsement is a way for someone to obtain a license  
16 to practice in the state if the individual meets 5  
17 criteria under 63 Pa.C.S. § 3111(a)(1) through (5).  
18 He stated the person must hold a current license;  
19 certificate; registration; or permit from another  
20 state, territory, or country, and the Board  
21 determines whether their state, territory or  
22 country's requirements are substantially equivalent  
23 to or exceed the requirements established by the  
24 Commonwealth.

25 Mr. Rouse noted the Board would make the

1 determination of substantial equivalency. He noted  
2 licensure by endorsement is not a function of the CPA  
3 Law, which says the board looks to NASBA to determine  
4 substantial equivalency. He mentioned that licensure  
5 by endorsement is under a separate statute that  
6 applies to all of the 29 boards and commissions under  
7 the Bureau of Professional and Occupational Affairs.

8 Mr. Rouse referred to how the Board originally  
9 drafted the annex and mentioned that the Board may  
10 want to look at whether or not any changes are  
11 required. He noted the next requirement is that the  
12 licensee must demonstrate competency in the  
13 profession or occupation through methods determined  
14 by the licensing board or licensing commission,  
15 including completing continuing education or having  
16 experience in a profession or occupation for at least  
17 two of the five years preceding the date of the  
18 application.

19 Mr. Rouse noted the third requirement is that  
20 the licensee has not committed any act that  
21 constitutes grounds for refusal; suspension; or  
22 revocation of a license, certificate, registration or  
23 permit to practice that profession or occupation in  
24 the Commonwealth unless the licensing board or  
25 licensing commission determines in its discretion



1 that the action is not an impediment to granting a  
2 license to practice in the Commonwealth. He noted  
3 the licensee must be in good standing and has not  
4 been disciplined by the jurisdiction that issued  
5 their license, and the person has paid the fees  
6 established by the licensing Board by regulation.

7 Mr. Rouse addressed initial discussions  
8 regarding licensure by endorsement, where  
9 recommendations were made to add § 11.5a to the  
10 regulations concerning licensure by endorsement.

11 Mr. Rouse referred to requirements for issuance  
12 of a license by endorsement under § 11.5a(a)(1), which  
13 reads, "has a current license, certificate,  
14 registration, or permit in good standing to practice  
15 public accounting in another jurisdiction whose  
16 standards are substantially equivalent to or exceed  
17 those established by the Board under § 4.2 of the  
18 Act."

19 Mr. Rouse noted prior Board discussion, where in  
20 order to be substantially equivalent, the  
21 jurisdiction in which the applicant holds a current  
22 and active certified public accountant certification  
23 and license must require (A) a baccalaureate or  
24 higher degree from a college or university accredited  
25 by an accrediting agency nationally recognized by the

1 United States Department of Education or a college or  
2 university approved by the Board, (B) completion of  
3 150 semester credits of postsecondary education, and  
4 (C) achievement of a passing score on the Uniform  
5 Certified Public Accountant Examination or other  
6 Board-approved skills examination.

7 Mr. Rouse again noted the Board makes the  
8 determination of whether another state's requirements  
9 are substantially equivalent to Pennsylvania  
10 regarding licensure by endorsement.

11 Mr. Rouse mentioned there are a lot of changes  
12 with CPA mobility and many states are adding  
13 additional avenues to obtaining a CPA license and  
14 asked whether the Board would like to consider making  
15 a change to (B), the completion of 150 semester  
16 credits of postsecondary education, to strike it  
17 completely, say at least 120 semester credits, or  
18 whether the current language is fine.

19 Chair Risler requested information as far as  
20 what other states are doing that could impact  
21 Pennsylvania before deciding.

22 Mr. Rouse mentioned that there was a time when  
23 all states required 150 semester credits of  
24 postsecondary education in order to be granted a CPA  
25 license. He noted movement in other states now

1 requiring 120 semester credits plus two years of  
2 experience and other proposals.

3 Chair Risler commented that the risk is that  
4 there will be issues with mobility in Pennsylvania,  
5 but the issue is changing language to make it more  
6 flexible to the Board for purposes of evaluating the  
7 requirements to become a CPA.

8 Chair Risler was not inclined to make changes  
9 and strike completion of 150 credits, unless there is  
10 some generic language to accommodate any type of  
11 mobility situations.

12 Mr. Rouse again mentioned that the purpose of  
13 licensure by endorsement was to reduce the  
14 unnecessary barriers to licensure for new residents,  
15 veterans, military spouses, and other people who move  
16 to and work in Pennsylvania. He noted that making it  
17 more flexible would be helpful in making sure people  
18 would be able to obtain a CPA license.

19 Chair Risler commented that Pennsylvania CPAs  
20 are still required to comply with the 150 credits and  
21 would be asking why they cannot do that if it is only  
22 for mobility purposes.

23 Mr. Ocker noted discussion on this topic at  
24 NASBA's Eastern Regional Meeting in Louisville and  
25 informed Board members that Ms. Cryder prepared a

1 whole presentation and summarization of where  
2 everything stands.

3           Jennifer Cryder, CPA, MBA, Chief Executive  
4 Officer, Pennsylvania Institute of Certified Public  
5 Accountants, encouraged Board members to defer  
6 changes concerning licensure by endorsement because  
7 many changes will occur within the next couple of  
8 weeks. She believed model language will be coming  
9 out from NASBA, noting they are working on changes to  
10 the Uniform Accountancy Act, statute and regulations.

11           Ms. Cryder commented that the sentiment of what  
12 a couple Board members were saying is to wait and see  
13 what the model language is so everyone is in  
14 alignment. She explained that the model language  
15 will not talk about 150 or 120 credits. She noted a  
16 number of states have adopted legislation for a 90-  
17 credit bachelor's degree and believed model language  
18 will talk about a bachelor's degree, not a number of  
19 postsecondary credit hours.

20           Ms. Cryder provided information about what is  
21 being discussed to be included in the model language  
22 and the Uniform Accountancy Act changes that NASBA  
23 and the American Institute of Certified Public  
24 Accountants (AICPA) are working on together. She  
25 stated AICPA and NASBA will come to every state board

1 of accountancy, noting there will be a public comment  
2 period for input.]

3 \*\*\*

4 Miscellaneous - CPA Mobility

5 [Jennifer Cryder, CPA, MBA, Chief Executive Officer,  
6 Pennsylvania Institute of Certified Public  
7 Accountants, addressed statute changes through the  
8 Uniform Accountancy Act. She stated NASBA will have  
9 model language changes for everyone to consider this  
10 summer due to targeting the legislative change for  
11 January 2025.

12 Ms. Cryder noted the Pennsylvania Institute of  
13 Certified Public Accountants (PICPA) is often  
14 involved in legislative changes in Pennsylvania and  
15 wanted to support CPAs in Pennsylvania. She  
16 presented to the Board to share information with  
17 regard to protecting the public in Pennsylvania as  
18 well as supporting practitioners.

19 Ms. Cryder addressed matters being discussed for  
20 the 2025 legislative session, noting NASBA and AICPA  
21 are driving this change through the Uniform  
22 Accountancy Act. She noted moving away from 150 and  
23 one and 120 and two entirely. She reported a focus  
24 on safe harboring or grandfathering current  
25 practitioners, so anybody who has been practicing

1 already regardless of what state they are in retains  
2 the ability to practice across state lines.

3 Ms. Cryder mentioned that there are many ways to  
4 get licensed in Pennsylvania, but practice under  
5 substantial equivalency is the only one where the  
6 practitioner does not have to maintain multiple  
7 licenses.

8 Ms. Cryder also mentioned that making licensure  
9 by endorsement more flexible does not solve the  
10 problem entirely because it is a pretty significant  
11 burden on the practitioner when they have to obtain  
12 and maintain multiple licenses with all the CE and  
13 ethics requirements.

14 Ms. Cryder stated PICPA, along with NASBA and  
15 AICPA, is in support of finding a way to preserve  
16 mobility and practice under substantial equivalency,  
17 where only one license is needed and is preferred.

18 Ms. Cryder discussed the grandfathering of  
19 current practitioners, so they do not lose their  
20 ability to practice across state lines, meaning  
21 everyone who is already in practice would not need to  
22 go through the process to apply for licensure by  
23 endorsement, reciprocity, or any of those other  
24 options.

25 Ms. Cryder provided sample language that has

1 been looked at in the profession, noting that it  
2 mirrors the grandfathering that happened when the  
3 profession went to 150. She believed NASBA will  
4 approach the Board on this concept but mentioned it  
5 is only a carve out for current CPAs to keep  
6 practicing while other pathways are developed. She  
7 noted it is a temporary fix and does not solve the  
8 problem or help new licensees coming into the  
9 profession deal with the complexity.

10 Mr. Rouse wanted to confirm that AICPA and NASBA  
11 are trying to create model language for all states  
12 and have that language by 2025.

13 Ms. Cryder explained that AICPA and NASBA want  
14 it ready to go for 2025 legislative sessions. She  
15 noted the CEO of NASBA, Dan Dustin, told her they  
16 will be drafting the language over the summer and  
17 hoped to share it with state boards and the public  
18 for comment by the end of the summer or very  
19 beginning of the fall.

20 Ms. Cryder addressed automatic mobility, which  
21 is another item being considered in model language.  
22 She reported four states have in their statute the  
23 idea of automatic mobility, which means someone with  
24 a valid license in another state could automatically  
25 practice. She noted automatic mobility is something

1 states are considering adding to their CPA Law, so  
2 everyone does not have to open their statutes as  
3 licensure models continue to evolve over time.

4 Ms. Cryder noted the system currently works  
5 because everybody has a general agreement around  
6 education, examination, and experience (EEE) being  
7 substantially equivalent. She mentioned that  
8 automatic mobility sounds great on the surface, but  
9 the Board would have to decide a minimum threshold in  
10 terms of public protection because there could be a  
11 variety of outcomes as those EEEs change.

12 Mr. Holland commented, absent of any legislative  
13 change in Pennsylvania, if there is a state that  
14 makes the change, what is to keep candidates from  
15 getting licensed and practicing in Pennsylvania. He  
16 asked how to not encourage candidates to go to  
17 another state to get licensed.

18 Ms. Cryder noted that Pennsylvania could be at a  
19 competitive disadvantage if other states add  
20 automatic mobility provisions and Pennsylvania does  
21 not. She stated mobility will break, and a student  
22 going through the process could look at this  
23 situation and decide to go to a state like North  
24 Carolina that has automatic mobility.

25 Mr. Rouse wanted to confirm that North Carolina



1 allows someone from another state to work there  
2 without a North Carolina license.

3 Ms. Cryder explained that someone who has a  
4 Pennsylvania license and has an audit client in North  
5 Carolina could practice public accounting in North  
6 Carolina regardless of the status of mobility simply  
7 based on their PA license, because the North Carolina  
8 State Board of Certified Public Accountant Examiners  
9 has put faith and trust that all other state boards  
10 of accountancy are doing their diligence and  
11 upholding the public trust.

12 Mr. Holland requested clarification as to  
13 whether automatic mobility is conducting an audit and  
14 then going back to their home state or setting up an  
15 office.

16 Ms. Cryder explained that principal place of  
17 business is a whole different question.

18 Mr. Rouse further explained that in Pennsylvania  
19 to practice under substantial equivalency their  
20 principal place of business has to be outside of  
21 Pennsylvania.

22 Ms. Ericson commented an individual could have a  
23 physical place of business outside of Pennsylvania,  
24 but all of their clients are in Pennsylvania. She  
25 noted an individual could be on one side of the

1 border and do all of the work on the other side. She  
2 mentioned that someone working in Pennsylvania should  
3 have a license for the majority of their clients.

4 Ms. Cryder stated mobility offers practitioners  
5 the ability to do that now, where under mobility, an  
6 individual would not need to get a license in  
7 Pennsylvania, and all of the state boards together  
8 have been comfortable with that for the last couple  
9 of decades.

10 Ms. Cryder explained that these are a couple of  
11 things coming through model language to consider,  
12 along with the removal of 150 and 120 language,  
13 specific numbers of credit hours and years of  
14 experience, because with their Structured  
15 Professional Program (SPP) concepts and with AICPA's  
16 concepts, both of them are clearly moving to  
17 competency-based licensure.

18 Ms. Cryder believed those will be removed  
19 quickly and to keep that in mind as it relates to any  
20 regulatory or statute change.

21 Chair Risler asked whether anyone is aware of  
22 how practice is responding to this, including  
23 nationally, regionally, and all of the different  
24 sized firms.

25 Ms. Cryder reported hearing a real concern about

1 going back to a situation with practitioners  
2 maintaining multiple licenses, especially for small  
3 and mid-sized firms, which is an incredible burden.  
4 She mentioned that a regional firm serving clients in  
5 every state would need to read every CPA Law and  
6 understand how they define the practice of public  
7 accounting and principal place of business. She  
8 stated practitioners are terrified of this because of  
9 the burden it will present to them.

10 Ms. Cryder mentioned that after practitioners  
11 have gone through the lengthy process of getting all  
12 these licenses in some states that they have to also  
13 maintain all of the different CPE requirements. She  
14 noted there to be a hard pivot when firm leaders  
15 start to understand the compliance requirements that  
16 will come from this, because it will significantly  
17 change the economics of the firm.

18 Chair Risler asked whether anything has been  
19 said about the elimination of the credit hour rule  
20 and focus on the competency aspect.

21 Ms. Cryder provided her personal opinion and  
22 believed most firms will consider the compliance  
23 requirements and say they cannot be bothered. She  
24 also believed firms will have significant portions of  
25 their professionals drop their license, which will

1 significantly impact the number of professionals that  
2 this group is regulating and the same across the  
3 country.

4 Ms. Cryder mentioned that larger firms who are  
5 incredibly focused on earnings before interest,  
6 taxes, depreciation, and amortization (EBITDA) will  
7 see this as incredibly unnecessary compliance that  
8 they are not interested in, especially for their tax  
9 and advisory staff. She also believed the profession  
10 will lose its franchise on tax as a result of this.

11 Mr. Rouse referred to 49 Pa. Code § 11.5, noting  
12 there is a temporary practice permit, which was used  
13 pre-mobility for someone who holds a current license  
14 or registration to practice public accounting in the  
15 other state and concurrently practices public  
16 accounting in the other state.

17 Mr. Rouse explained that someone would obtain a  
18 temporary practice permit from the Board prior to  
19 performing the temporary work, which is good for a  
20 12-month period and is renewable. He further  
21 explained that it allows the permit holder to work  
22 for not more than 500 hours in the Commonwealth  
23 during that 12-month period of time. He again  
24 mentioned it is renewable and, under the regulations,  
25 costs \$25.

1 Mr. Ocker did not understand why other state  
2 boards are making these changes and did not believe  
3 it was in the best interest of the profession moving  
4 forward, other than trying to get those CPAs into  
5 their state and making it more attractive. He stated  
6 the CPA is a nationally recognized certification that  
7 should remain that across all states, and equivalency  
8 and mobility should maintain. He noted not being  
9 sure why other states are quickly moving to change  
10 without the help from NASBA besides trying to get  
11 more CPAs in their state.

12 Ms. Cryder informed Board members that the items  
13 highlighted are the items that will come from NASBA.  
14 She was not focusing on the unilateral state moves  
15 and agreed with Mr. Ocker. She again noted NASBA and  
16 AICPA are driving change in the profession around  
17 licensure, which is her focus because it will happen.

18 Ms. Cryder commented that mobility will break in  
19 2025 and certainly could break from states taking  
20 unilateral action, noting NASBA has been very clear  
21 in stating that they are trying to move forward with  
22 Uniform Accountancy Act changes before states can  
23 take unilateral action to try to preempt that.

24 Ms. Cryder referred to issues the Board has to  
25 think through, including how the Pennsylvania State

1 Board of Accountancy will handle it when mobility  
2 breaks and how to serve practitioners in Pennsylvania  
3 and those who want to practice in their state. She  
4 mentioned discussion about the determination of  
5 substantial equivalency, noting there are both state  
6 and individual levels of substantial equivalency, and  
7 in their statute the determination of both of those  
8 are deferred to the National Qualifications Appraisal  
9 Service (NQAS), which is the piece of NASBA that  
10 makes that determination.

11 Ms. Cryder told Board members to consider how  
12 that process has worked for the state board and  
13 whether they are getting the needed level of service  
14 from NASBA, especially when NQAS gets hit with a huge  
15 influx, because there are 21 or 22 states that defer  
16 to NQAS. She believed one individual makes up NQAS  
17 and asked whether that is enough capacity to handle  
18 the influx when determining substantial equivalency  
19 at the individual level. She suggested considering  
20 the turnaround time from NASBA now and what that  
21 could look like if there is an influx.

22 Chair Risler commented that the Board does not  
23 currently have NQAS in their regulations in  
24 Pennsylvania.

25 Ms. Cryder explained that it is a function that

1 the Pennsylvania State Board of Accountancy has  
2 delegated to NASBA.

3 Mr. Holland commented that it would be a good  
4 approach if an individual has a license with an  
5 initial date on or before December 31, 2024, to allow  
6 them to practice, because it seemed to solve some of  
7 the problems and concerns but also protect the public  
8 moving forward with new licensees.

9 Ms. Cryder noted that to be the exact idea of  
10 the safe harbor, and the Board could expect to see  
11 that in model language.

12 Ms. Cryder mentioned the Board should also think  
13 about, assuming a licensee is not able to practice  
14 based on mobility because they have been deemed to be  
15 substantially equivalent, other ways that  
16 practitioners can get a Pennsylvania license,  
17 including the temporary permit to practice,  
18 endorsement, reciprocity.

19 Ms. Cryder wanted to emphasize that all of those  
20 require obtaining and maintaining extra licenses and  
21 is where the profession gets into some really risky  
22 territory and believed a lot of people would be  
23 dropping their CPA license. She asked the Board to  
24 consider, because NASBA is sort of the back office  
25 for so much of this for us, the turnaround times when

1 people are making these applications and whether they  
2 are getting what they need from NASBA. She mentioned  
3 that any opportunities where the regulations allow  
4 the Board to set guidelines and sort of defer  
5 responsibility to staff could be some great  
6 opportunities to identify and think about to expedite  
7 the process.

8 Mr. Rouse asked what the reason is behind  
9 someone dropping their license if their principal  
10 place of business is in another state.

11 Ms. Cryder referred to the leader of a national  
12 accounting firm or a large regional accounting firm  
13 of a couple hundred people, where changes happening  
14 across the country could apply to thousands of their  
15 professionals.

16 Ms. Cryder noted that leaders of firms have told  
17 her of having to make the assessment for every  
18 professional and all states in which they need to be  
19 licensed and maintaining those licenses. The cost of  
20 compliance becomes so significant for their firm that  
21 they will direct their tax and advisory professionals  
22 to drop their CPA license, because they do not need  
23 it to do their work. She noted being able to do the  
24 work in an unregulated way and preferring that way,  
25 because of not only the costs of compliance but the



1 risk that it opens up for the firm when a  
2 professional is licensed.

3 Ms. Ericson did not see it as difficult to  
4 maintain multiple licenses.

5 Mr. Ocker commented more smaller firms are  
6 dropping their certification because they are doing  
7 advisory tax and no attest. He stated needing  
8 multiple licenses across every state for tax work or  
9 anything of that nature would make it more complex.

10 Mr. Grater mentioned that there are some that  
11 have attest function that are separating the firms  
12 into one part of attest, where a firm will have CPAs  
13 and then the other part as tax and advisory, so they  
14 do not need licenses. He commented that the firm  
15 separated out advisory services from accounting and  
16 tax and what is to stop them from separating out tax  
17 also. He also mentioned ethics requirements specific  
18 to a state could make it very difficult.

19 Ms. Cryder stated many of the national firms  
20 have formed two entities, where the tax and advisory  
21 staff have moved into a separate entity and are not  
22 licensing those individuals.

23 Mr. O'Brien asked for preliminary thoughts on  
24 the development of a competency-based model.

25 Ms. Cryder believed it to be near term, noting

1 they are trying to figure that out concurrent with  
2 the model language for the Accountancy Act so that  
3 they can each reflect the other. She stated NASBA  
4 and AICPA each have their own concepts and are  
5 converging. She believed an agreement may already be  
6 in place.

7 Ms. Cryder noted the idea is that the CPA Exam  
8 is uniform across the country, and everyone has  
9 either a bachelor's in accounting or a bachelor's  
10 degree with some number of accounting and auditing  
11 and tax credit hours.

12 Ms. Cryder also noted that beyond that, what may  
13 be thought of as the year experience of the 30 credit  
14 hours now becomes a combination of competency-based  
15 learning, where an individual is working against a  
16 framework or a rubric of competencies, demonstrating  
17 that on the job, and their supervisor is signing off.  
18 She again stated it intentionally removes 150 and  
19 120, one-year and two-year experience. She mentioned  
20 that the model may be completed by the end of the  
21 summer 2024.

22 Mr. Ocker mentioned that there is already the  
23 earn and learn out there that three universities now  
24 have, where someone can get the extra 30 hours. He  
25 also noted someone who has 140 hours and needs 10

1 more hours can go through these universities and work  
2 for firms to get those extra additional credits.

3 Ms. Cryder explained that the idea with  
4 competency-based learning is everything after a  
5 bachelor's degree potentially could be off  
6 transcript. She also noted it will require statute  
7 change in all the jurisdictions.

8 Ms. Cryder noted that some states could move  
9 this through in a week, and Pennsylvania is starting  
10 to lay groundwork and thinking about what law changes  
11 would look like in Pennsylvania and who the  
12 stakeholders are that need to understand that because  
13 a lot of the work they do as the advocate is moving a  
14 piece of legislation through the process.

15 Mr. Rouse commented that with all of the issues  
16 that AICPA and NASBA are proposing, where there will  
17 be model language and an exposure draft, that the  
18 Board will be able to put those on the  
19 Board's agenda for discussion.

20 Chair Risler asked whether it makes sense to  
21 defer any further discussion about licensure by  
22 endorsement.

23 Mr. Rouse asked whether the Board wished to  
24 continue moving forward with what we have.

25 Chair Risler agreed to continue with what they

1 have in light of all the conversations, noting she  
2 was not aware of many requests using those rules  
3 where it had been an issue.

4 Mr. Rouse noted that the Board will continue  
5 with what they have, and when the proposed regulation  
6 is ready, there will be another 30-day comment anyway  
7 if there are any other changes in between.

8 Chair Risler asked whether the model rules might  
9 be out by the September meeting.

10 Ms. Cryder informed Board members that the  
11 Uniform Accountancy Act Committee is in active  
12 meetings reviewing language but could not provide a  
13 date.

14 Chair Risler thanked Ms. Cryder for sharing all  
15 of the information and requested she keep the Board  
16 up to date. She asked whether there would be a long  
17 process of approval from the legislative perspective  
18 if UAA gets updated.

19 Mr. Rouse explained that it would depend on  
20 whether the issue is a statutory or a regulatory  
21 issue because statutory is the legislature and  
22 regulatory is a Board process with Board Counsel,  
23 regulatory counsel, and public meetings.

24 Ms. Cryder stated they are gearing up for  
25 advocating on statutory change in Pennsylvania and is

1 why PICPA is also waiting on UAA language to be able  
2 to start the process of the statutory change.]

3 \*\*\*

4 Report of Board Counsel - Regulations

5 [Ronald K. Rouse, Esquire, Board Counsel, noted that  
6 the Board will continue on the regulatory process for  
7 16A-5517 regarding licensure by endorsement based on  
8 the discussion.

9 Marc Farrell, Esquire, Regulatory Counsel,  
10 Office of Chief Counsel, Department of State, added  
11 that licensure by endorsement does not have to solve  
12 any of the mobility issues because it has always been  
13 something to be looked at as one more option if  
14 somebody cannot fit into any of the slots for  
15 licensure.

16 Mr. Farrell also stated the Board does not have  
17 to set forth what they consider to be substantially  
18 equivalent, because there is nothing that requires  
19 that. He noted that taking out the hours in (B) and  
20 just leaving it as the degree and the passing score  
21 does not mean a state that has 120 or 150 is  
22 substantially equivalent.

23 Mr. Farrell explained that the Board can do that  
24 in the background, where getting rid of the specific  
25 150 in that regulation would still leave all options

1 open and may add flexibility. He stated some boards  
2 have not even set forth any substantially equivalent  
3 criteria and just said the licensee must be from a  
4 substantially equivalent jurisdiction period.

5 Mr. Rouse noted 16A-5519 regarding general  
6 revisions is under review.

7 Mr. Farrell stated all of the documents from  
8 Board Counsel look to be in order, where there may be  
9 a few minor non-substantive edits. He reported it to  
10 be basically ready to leave the department and sent  
11 to the governor's office for review.

12 Mr. Rouse explained that 16A-5519 has a number  
13 of changes, including the timing for which candidates  
14 will be able to complete the CPA Examination. He  
15 noted it also corresponds with the Act 110 of 2022  
16 amendments to the CPA Law. He noted there were  
17 changes regarding education because it includes  
18 economics and technology as subjects a person can  
19 take to meet the education requirements as well as  
20 changes to peer review.

21 Mr. Farrell stated whatever happens with 16A-  
22 5519 from here on out is out of the department's  
23 control. He noted the intersection of three  
24 different statutes, the Regulatory Review Act, the  
25 Commonwealth Attorney's Law, and the Commonwealth

1 Documents Law, along with an executive order and the  
2 Independent Regulatory Review Commission (IRRC)  
3 regulations that all kind of control the timing and  
4 the steps from here.

5 Mr. Farrell mentioned that the regulatory review  
6 process is complex, and it will probably not be  
7 finished until 2025.]

8 \*\*\*

9 Report of Board Chair

10 [Sheri L. Risler, CPA, Chair, encouraged Board  
11 members to review the requirements of the Sunshine  
12 Act and Gift Ban Policy.]

13 \*\*\*

14 Report of Acting Commissioner - No Report

15 \*\*\*

16 Report of Board Administrator

17 [Miranda Murphy, Board Administrator, informed Board  
18 members that she received information from Patricia  
19 Hartman concerning the Credit Relief Initiative and  
20 reported 238 total requests with 223 approvals. She  
21 noted 15 of them did not fall under the time frame  
22 and would need to submit those requests directly to  
23 the Board.

24 Chair Risler commented that about 230 candidates  
25 were able to extend taking the CPA Exam and asked Ms.

1 Murphy to comment on the Credit Relief Initiative at  
2 each meeting.]

3 \*\*\*

4 Report of Committees

5 [Sheri L. Risler, CPA, Chair, informed Board members  
6 that the Newsletter Committee is meeting next week to  
7 discuss the next newsletter and will have more to  
8 report at the next meeting.]

9 \*\*\*

10 Correspondence

11 [Ronald K. Rouse, Esquire, Board Counsel, noted the  
12 Board would need to do more research on Foreign  
13 Credentials Service of America (FCSA).

14 Chair Risler explained that the Board received  
15 some requests from agencies asking them to put their  
16 names on the website regarding evaluation of foreign  
17 educational credentials. She stated the Board would  
18 would have to do more research to determine whether  
19 or not to add them to their website. She noted the  
20 Board would also speak with NASBA to make the  
21 determination as to which agencies are acceptable.  
22 She mentioned also receiving a letter from the City  
23 of Philadelphia regarding an accounting matter that  
24 is outside the Board's jurisdiction.]

25 MR. ROUSE:



1           Would the Chair entertain a motion to  
2           direct Board Counsel to draft a letter  
3           consistent with the discussion in Executive  
4           Session regarding item 17, City of  
5           Philadelphia, Health and Human Services  
6           Cabinet.

7 CHAIR RISLER:

8           Regarding item 17, City of Philadelphia  
9           Health and Human Services Cabinet, will the  
10          Board entertain a motion to direct counsel  
11          to draft a letter responding to that  
12          matter?

13 MR. HOLLAND:

14           So moved.

15 MR. GRATER:

16           Second.

17 CHAIR RISLER:

18           Any discussion? Roll call, please.

19

20           Petchel, aye; Ocker, aye; O'Brien, aye;  
21           Holland, aye; Grater, aye; Ericson, aye;  
22           Eaton, aye; Risler, aye.

23 [The motion carried unanimously.]

24

\*\*\*

25 Miscellaneous - 2023 State Board of Accountancy

1 Annual Report

2 [Sheri L. Risler, CPA, Chair, addressed NASBA's  
3 Annual Report announcing a new president and CEO, Dan  
4 Dustin, and a new vice chair nominee. She encouraged  
5 Board members to read the letter from former  
6 president, Ken Bishop, who is retiring, along with a  
7 lot of other good information.]

8 \*\*\*

9 Miscellaneous - NASBA - Q1 2024 Enforcement Report

10 [Ronald K. Rouse, Esquire, Board Counsel, asked  
11 whether the prosecutorial division would like to  
12 receive NASBA's Enforcement Report.]

13 \*\*\*

14 Miscellaneous - NASBA Q1 2024 Candidate Care Report

15 [Sheri L. Risler, CPA, Chair, referred to information  
16 concerning issues regarding candidates taking the CPA  
17 Exam, noting they were consistent with prior  
18 periods.]

19 \*\*\*

20 Miscellaneous - NASBA Board of Directors Interest

21 [Sheri L. Risler, CPA, Chair, noted receiving a  
22 letter regarding anyone interested in becoming a  
23 member of the Board of Directors of NASBA.]

24 \*\*\*

25 Miscellaneous - NASBA State Board Report

1 [Sheri L. Risler, CPA, Chair, also noted receiving  
2 information from NASBA's Board.]

3 \*\*\*

4 Miscellaneous - Exam Fee Changes

5 [Sheri L. Risler, CPA, Chair, reported exam fees  
6 increased.]

7 \*\*\*

8 Miscellaneous - Exam Pass Rates

9 [Sheri L. Risler, CPA, Chair, noted AICPA is  
10 consistently monitoring exam pass rates regarding the  
11 new CPA Exam.]

12 Mr. Ocker stated Mike Decker from AICPA made a  
13 presentation during NASBA's Eastern Regional Meeting  
14 and hoped to have everything leveled out within the  
15 next year.

16 Mr. Ocker referred to item 11 and asked whether  
17 they are giving candidates in Pennsylvania relief in  
18 the interim until the extension passes.

19 Mr. Rouse explained that the extension for the  
20 CPA Exam is until June 30, 2025, and they are able to  
21 get that relief.

22 Ms. Cryder stated the credit relief until June  
23 2025 was only for credits in hand on December 31,  
24 2023, so anybody currently going through the exam  
25 process is still at the 18 months.

1 Ms. Cryder explained that until they go through  
2 the regulatory process that they do not get the  
3 benefit of the 30 months the Board intended when they  
4 voted last year. She further explained that PA  
5 candidates are stuck at 18 months until that  
6 regulation change happens.

7 Chair Risler asked whether the Board could  
8 provisionally do something between now and then.

9 Mr. Rouse stated the Board has the authority to  
10 grant an extension but must be based on something  
11 that is already in the regulations, noting the 30  
12 months is still in the process.

13 Chair Risler mentioned that anyone in 2024 would  
14 have to apply for the extension through what is on  
15 the website, and the Board does not have any ability  
16 to change the conditions on that piece of paper.

17 Mr. Rouse noted the Board has an existing  
18 regulation, where an individual must complete all  
19 four sections of the CPA Exam within the 18-month  
20 rolling period.

21 Mr. Farrell suggested adding the extension  
22 information in the newsletter to make people aware  
23 that they can ask for an extension.]

24 \*\*\*

25 Miscellaneous - Next Meeting Dates

1 [Sheri L. Risler, CPA, Chair, reminded everyone that  
2 the remaining 2024 Board meeting dates are July 18,  
3 September 19, and November 19. She also noted 2025  
4 meeting dates.]

5 \*\*\*

6 [Sheri L. Risler, CPA, Chair, thanked everyone for  
7 attending the meeting.

8 Chair Risler also thanked Mr. Rouse and Ms.  
9 Murphy for all of their support.]

10 \*\*\*

11 Adjournment

12 CHAIR RISLER:

13 Motion to adjourn.

14 MR. HOLLAND:

15 So moved.

16 MR. GRATER:

17 Second.

18 CHAIR RISLER:

19 Meeting adjourned.

20 \*\*\*

21 [There being no further business, the State Board of  
22 Accountancy Meeting adjourned at 12:16 p.m.]

23 \*\*\*

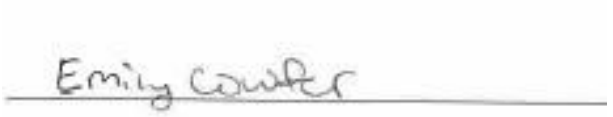
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CERTIFICATE

I hereby certify that the foregoing summary minutes of the State Board of Accountancy meeting, was reduced to writing by me or under my supervision, and that the minutes accurately summarize the substance of the State Board of Accountancy meeting.



Emily Cowfer,  
Minute Clerk  
Sargent's Court Reporting  
Service, Inc.

STATE BOARD OF ACCOUNTANCY  
REFERENCE INDEX

June 21, 2024

## TIME

## AGENDA

1		
2		
3		
4		
5		
6		
7		
8	9:00	Executive Session
9	10:30	Return to Open Session
10		
11	10:30	Official Call to Order
12		
13	10:31	Roll Call/Introduction of Attendees
14		
15	10:33	Approval of Minutes - Tabled
16		
17	10:39	Report of Prosecutorial Division
18		
19	10:45	Report of Board Counsel
20		
21	10:49	Review of Program Sponsor Applications
22		
23	10:50	Review of Requests
24		
25	10:53	Report of Board Counsel (cont.)
26		
27	11:14	Miscellaneous
28		
29	11:57	Report of Board Counsel (cont.)
30		
31	12:04	Report of Board Chair
32		
33	12:04	Report of Board Administrator
34		
35	12:05	Report of Committees
36		
37	12:06	Correspondence
38		
39	12:08	Miscellaneous (cont.)
40		
41	12:16	Adjournment
42		
43		
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