

BOARD MEMORANDUM

March 6, 2024

- TO:All Board MembersChristopher Kaisershot, Assistant Attorney General
- FROM: Charles Selcer, CPA, Board Chair
- SUBJECT: MARCH 6, 2024, BOARD MEETING MINUTES GOLDEN RULE BUILDING, Suite 295 9:04 AM

The Board held its regularly scheduled meeting on the above-mentioned date, time and location.

 CALL TO ORDER Charles Selcer, CPA, Chair Chas McElroy, CPA, Vice Chair Godson Sowah, CPA, Secretary/Treasurer Ann Etter, CPA Amanda Guanzini, CPA (ABSENT) Todd Lifson, CPA Douglas Moore Lance Radziej, CPA Diane Rosenwald

> OTHERS IN ATTENDANCE: Doreen Johnson, Executive Director Kay Weiss, Assistant Executive Director Holly Salmela, Investigator Joshua Bramley, Complaint Specialist J'Nell Nordin, CPE and Firms Specialist

GUESTS:

Troy Olsen, Minnesota Association of Public Accountants (MAPA) Linda Wedul, , Minnesota Society of Certified Public Accountants (MNCPA) Geno Fragnito, Minnesota Society of Certified Public Accountants (MNCPA) The mission of the Minnesota Board of Accountancy is to protect the public through the regulation of the practice of accounting by Certified Public Accountants, Registered Accounting Practitioners and others in Minnesota by:

- Ensuring that those entering the practice meet standards of competency by way of education, experience and examination;
- Establishing standards of practice for those certified or registered to practice;
- Requiring that anyone practicing or offering to practice accounting be certified or registered and continue to maintain their professional competence;
- Enforcing the laws, rules and standards governing the practice of accounting in Minnesota in a fair, expeditious and consistent manner.
- 2) INTRODUCTIONS
- 3) APPROVAL OF THE MEETING MINUTES MSP: To approve the January 18, 2024, meeting minutes as amended
- 4) COMPLAINT COMMITTEE REPORT (Ann Etter, CPA, Committee Chair) The Complaint Committee requests a closed session to deal with enforcement matters.
 - A) The Complaint Committee requests a closed session to deal with enforcement matters.

MSP: To go into close session to address enforcement actions under Minnesota Statutes 214 (2022)

MSP: To reopen the meeting

- B) The Board issued the following Orders:
 - (1) In the Matter of the Certified Public Accountant Firm Permit of Marc van Zandt

MSP: To accept the Complaint Committee report

- 5) EXECUTIVE COMMITTEE REPORT (Charles Selcer, CPA, Board Chair)
 - A) CPE Audits Underway.
 - B) System Updates for New Exam Disciplines Underway.
 - C) NASBA Update on Credit Extensions for Exam Transition CPE Audits Exam expiration dates are updated and visible to candidates.
 - D) Updates to the Board's licensing system to accept the new exam score disciplines are underway.
 - E) MNCPA Bill regarding education changes A delete-all revision related to the CPE option are underway. The bill currently has a July 1, 2026, implementation date. Executive Director will be working on a revised fiscal note.

F) AICPA Board of Examiners Meeting – Discussed. The Board reported the usual uptick in people sitting for the exam prior to a transition. Early feedback on the new disciplines has BAR as the most popular thus far.

MSP: To approve the Executive Committee report

- 6) EXECUTIVE DIRECTOR'S REPORT (Doreen Johnson, Executive Director)
 - A) Budget and Revenue reports FY24 Discussed.
 - B) Staffing updates High volume of work, but complaint and licensing work continues to move effectively.

MSP: To approve the Executive Director's report

- 7) INVESTIGATOR'S REPORT (Holly Salmela, Investigator)
 - A) Order Lifting Suspension Discussed.
 - B) 150 complaint files are currently open.
- 8) LAWS AND RULES COMMITTEE MEETING REPORT (Todd Lifson, CPA, Acting Committee Chair)
 - A) SONAR Reviewed and edited by committee.
 - B) Rules Draft Committee made a motion to recommend to the Board the changes to the rules found on the Revisor's draft dated 2/29/24
 MP: To accept the rule changes

MSP: To accept the Laws and Rules Committee report

- 9) CONTINUING PROFESSIONAL EDUCATION MEETING REPORT (Godson Sowah, CPA, Committee Chair) No committee meeting held.
- 10) FIRM CREDENTIALING and PEER REVIEW COMMITTEE REPORT (Lance Radziej, CPA, Committee Chair) No committee meeting held.
- 11) UNFINISHED BUSINESS
 - A) Final 2024 Renewals Update Discussed.
 - B) Rules Update
 - SONAR and Rules Draft (ATTACH. 11B1) Discussed.
 MSP: To accept the additional proposed rule changes noted on ATTACH. 11B1
 - Authorizing Resolution: Giving Dual Notice of Intent to Adopt Rules – Discussed.
 MSP: To accept the Authorizing Resolution

- (3) Hearing Date Selection In the event of a rules hearing, it will be held on June 4, 2024.
- 12) NEW BUSINESS
 - A) Applications for Reinstatement:
 - (1) Walter Philip Michels **MSP: To approve**
 - (2) Donald Thomas Paterson **MSP: To approve**
 - (3) Katherine Jane Robart Bal **MSP: To approve**
 - (4) Dana Michelle Staples MSP: To approve
 - (5) Rena E. Verdoljak MSP: To approve
 - B) Requests for Exception:
 - (1) Applicants:
 - a. Applicant A
 - MSP: To approve FAR extension to June 30, 2025
 - b. Applicant B
 MSP: To approve AUD, FAR, and BEC extensions to June 30, 2025
 - c. Applicant C MSP: To approve FAR and REG extensions to June 30, 2025
 - d. Applicant D MSP: To approve AUD and BEC extensions to June 30, 2025
 - e. Applicant E MSP: To approve AUD and REG extensions to June 30, 2025
 - f. Applicant F
 MSP: To approve BEC and REG extensions to June 30, 2025
 - (2) Licensee:

"The board may in particular cases make exceptions to the requirements in parts 1105.3000, item A, and 1105.3100, subpart 1 [CPE requirements], for reasons of individual hardship including health, military service, foreign residence, or other good cause." – Minnesota Rules, part 1105.3300, item B (2023)

a. Bradley Wallace MSP: To approve FY25 CPE exemption

- (3) Firm:
 - a. Charles E. Snustead CPA

MSP: To deny request to waive firm permit renewal

- C) Applications for Firm Permit:
 - (1) Minnesota Firm Permits
 - a. Winters, Meier & Larson Accounting and Tax **MSP: To approve**
 - b. VanDussen CPA, LLC
 - c. MSP: To approve
 - d. Ariana N. Pooley, Ltd MSP: To approve
 - (2) Foreign Firm Permits
 - a. David A Levy CPA LLC MSP: To approve
 - b. Berman Hopkins Wright & LaHam CPAs and Associates **MSP: To approve**
 - c. Harris CPAs P.C. MSP: To approve
 - d. WithumSmith+Brown, PC MSP: To approve
 - e. D. L. Purvine, CPA, PLLC (ATTACH. 12C2e) MSP: To approve
- D) Firm Name Change Requests:
 - Bayerkohler & Graff Ltd -change to- Graff, Ltd.MSP: To approve
- E) Firm Name Change for Doing Business As (DBA) Requests:
 - (1) Van Winkle CPA Advisor PLLC DBA: Jenson & Co. CPA Advisors change to Van Winkle CPA Advisor PLLC DBA: Van Winkle & Co. CPA Advisors
 MSP: To approve

- F) In Compliance with Minnesota Rules, part 1105.4600-1105.5500 (2023) the following firms submitted a report with a finding of "pass" and pursuant to the Delegation of Authority, the Executive Director accepted the reports:
 - (1) Sullivan & Fengler CPA P.A.
 - (2) Novak Francella LLC
 - (3) Wolf & Company, P.C.
 - (4) REDW LLC
 - (5) KCHM, L.L.C.
 - (6) Hagen Graves, Ltd.
 - (7) Deborah McDonald CPA LLC
 - (8) Abdo LLP
 - (9) Gary T Haworth and Co Ltd
 - (10) Anderson Hager & Moe SC
 - (11) Mazars USA LLP
 - (12) EisnerAmper LLP
 - (13) Niewedde & Wiens
 - (14) D.I. Johnson Ltd
 - (15) Robert Rampi Ltd
 - (16) Begalka & Swanson PC
 - (17) Struss CPAs, P.C.
 - (18) Mair & Associates PLLP
 - (19) Westberg Eischens PLLP
 - (20) Cummings Keegan & Co PLLP
 - (21) Barry Mosier CPA, PLC
 - (22) Peterson Company Ltd.
 - (23) Kolquist, Seitz & Goldman, LLC
 - (24) Arledge & Associates, PC
 - (25) Johnson, Tibodeau, Bottin, PSC
 - (26) Ahola, Mack & Associates, Ltd.
 - (27) Honstad, Dieser & Mangskau PLLP
 - (28) Williams-Keepers LLC
 - (29) Berger Consulting, LLC
 - (30) LBMC, PC
 - (31) Copeland Buhl & Company PLLP
 - (32) Muckala & Werhan, PLLC
 - (33) Michael C. Lundbohm, Ltd
 - (34) Gray CPA, LLC
 - (35) Elliott Davis, LLC
 - (36) Terry M Belford, CPA

- (37) BGHN Associates, P.C.
- (38) Boyum & Barenscheer PLLP
- (39) Harrington Langer & Associates
- (40) Marcum LLP
- (41) Smith Schafer & Associates Ltd
- (42) Michael J. Merritt, CPA, Ltd.
- (43) Gerdts CPA Ltd.
- (44) Betts & Hayes Ltd
- (45) Conway, Deuth, and Schmiesing, PLLP
- (46) Riley Martin Ltd
- (47) Smith & Sem, Ltd
- (48) Lethert, Skwira, Schultz & Co. LLP
- (49) Stenseth, Samuelson & Boese, Ltd

MSP: To accept the Peer Review reports

- G) Peer Review with Other Rating:
 - (1) DTN Accounting and Tax Services Inc DBA Dao T Nguyen MSP: To accept
- H) Peer Review Extension Request:
 - (1) Wilson Tibor & Maves, Ltd MSP: To deny
- I) Minnesota Association of Public Accountants (MAPA) Report Acceptance Body (RAB) annual report
 MSP: To accept the report
- J) National Asociation of State Boards of Accountancy (NASBA) Q4 2023
 Candidate Care Report and Statistics Discussed.
- K) New Licensee Report MSP: To accept
- L) NASBA Fee Increase Notice (ATTACH 12L) FYI only.

- 13) PUBLIC COMMENT
- 14) ADJOURN MSP: To adjourn at 11:35 AM

Next Meeting: May 2, 2024

cc: Professional Societies and Interested Parties



STATEMENT OF NEED AND REASONABLENESS

Proposed Amendment to Rules Governing Examination Credit Requirements and Continuing Professional Education Late Processing Fees, *Minnesota Rules*, parts 1105.2000 and 1105.3000

Revisor's ID Number R-04851

MARCH 2024

ALTERNATIVE FORMAT

Upon request, this information can be made available in an alternative format, such as large print, braille, or audio. To make a request, contact Kay Weiss at the Board of Accountancy, 85 E. 7th Place, Suite 125, St. Paul, MN 55101, 651-757-1523, and email: *kay.weiss@state.mn.us*. TTY users may call the Board at (800) 627-3529.

INTRODUCTION AND BACKGROUND INFORMATION

The mandate of the Minnesota Board of Accountancy ("Board") is to protect the public through the regulation of the practice of accounting by Certified Public Accountants ("CPA"), Registered Accounting Practitioners ("RAP") and others in Minnesota by:

- ensuring that those entering the practice meet standards of competency by way of education, experience and examination;
- establishing standards of practice for those certified or registered to practice;
- requiring that anyone practicing or offering to practice accounting be certified or registered and continue to maintain their professional competence;
- enforcing the laws, rules and standards governing the practice of accounting in Minnesota in a fair, expeditious and consistent manner.

The nature of the proposed rules of the Board of Accountancy is to amend its current rules to:

- change the Uniform CPA Examination section validity from 18 months to 30 months, in keeping with recommendations in the Uniform Accountancy Act to substantially extend the validity of exam credits;
- to cap late processing fees related to CPE to no more than the applicable accrued fee for the three-year CPE reporting cycle associated with the renewal that would reestablish an individual's license as "valid"; and
- make housekeeping modifications.

STATUTORY AUTHORITY

This rulemaking is an amendment of rules for which the Legislature has not revised the statutory authority and so Minnesota Statutes, section 14.125, does not apply.

The Board's statutory authority to adopt the rules is stated in Minnesota Statutes, section 326A.02, subdivision 5, which provides:

326A.02 STATE BOARD OF ACCOUNTANCY

Subd. 5. **Rules.** The Board may adopt rules governing its administration and enforcement of this chapter and the conduct of licensees and persons registered under section 326A.06, paragraph (b), including:

(1) rules governing the board's meetings and the conduct of its business;

(2) rules of procedure governing the conduct of investigations and hearings and discipline by the board;

(3) rules specifying the educational and experience qualifications required for the issuance of certificates and the continuing professional education required for renewal of certificates;

(4) rules of professional conduct directed to controlling the quality and probity of services by licensees, and dealing among other things with independence, integrity, and objectivity; competence and technical standards; and responsibilities to the public and to clients;

(5) rules governing the professional standards applicable to licensees including adoption of the standards specified in section 326A.01, subdivision 2, and as developed for general application by recognized national accountancy organizations such as the American Institute of Certified Public Accountants or the Public Company Accounting Oversight Board;

(6) rules that incorporate by reference the standards for attesting listed in section 326A.01, subdivision 2, that are consistent with the standards of general applicability recognized by national accountancy organizations, including the American Institute of Certified Public Accountants and the Public Company Accounting Oversight Board;

(7) rules governing the manner and circumstances of use of the titles "certified public accountant," "CPA," "registered accounting practitioner," and "RAP";

(8) rules regarding peer review that may be required to be performed under provisions of this chapter;

(9) rules on substantial equivalence to implement section 326A.14;

- (10) rules regarding the conduct of the certified public accountant examination;
- (11) rules regarding the issuance and renewals of certificates, permits, and registrations;
- (12) rules regarding transition provisions to implement this chapter;

(13) rules specifying the educational and experience qualifications for registration, rules of professional conduct, rules regarding peer review, rules governing standards for providing services, and rules regarding the conduct and content of examination for those persons registered under section 326A.06, paragraph (b);

(14) rules regarding fees for examinations, certificate issuance and renewal, firm permits, registrations under section 326A.06, paragraph (b), notifications made under section 326A.14, and late processing fees; and

(15) upon any change to this chapter, if the board determines a change in Minnesota Rules is required, the board may initiate the expedited process under section 14.389 up to one year after the effective date of the change to this chapter.

Under this statute, the Board has the necessary statutory authority to adopt the proposed rules.

REGULATORY ANALYSIS

Minnesota Statutes, section 14.131, sets out eight factors for a regulatory analysis that must be included in the SONAR. Paragraphs (1) through (8) below quote these factors and then give the agency's response.

"(1) a description of the classes of persons who probably will be affected by the proposed rule, including classes that will bear the costs of the proposed rule and classes that will benefit from the proposed rule"

The classes of persons affected by the proposed amendments to the rules are applicants for the Certified Public Accountant (CPA) exam and for licensure, all licensees who are required to obtain continuing education to renew a license, and the public for whom CPA services are performed. No class bears a specific cost for the proposed rules. In general, all classes will benefit from the proposed rules.

A line item in the Board's budget covers the cost of the rulemaking.

"(2) the probable costs to the agency and to any other agency of the implementation and enforcement of the proposed rule and any anticipated effect on state revenues"

The probable costs to the Board include the cost of the rulemaking in general.

The Board does not anticipate an increase or decrease in the cost of enforcing the rules. It also does not anticipate probable costs to any other agency because the Board is the only entity charged with implementing and enforcing the proposed rules.

"(3) a determination of whether there are less costly methods or less intrusive methods for achieving the purpose of the proposed rule"

The purpose of the proposed rule modifications is to change requirements delineated in existing rules and update the rules in light of statutory changes. Rule writing is the only method that exists to achieve this goal.

"(4) a description of any alternative methods for achieving the purpose of the proposed rule that were seriously considered by the agency and the reasons why they were rejected in favor of the proposed rule"

Administrative rules are the only method available to the Board to define requirements for examination, individual licensure, and firm permitting.

"(5) the probable costs of complying with the proposed rule, including the portion of the total costs that will be borne by identifiable categories of affected parties, such as separate classes of governmental units, businesses, or individuals"

There are no probable costs for governmental units, businesses, or individuals to comply with the proposed rules. Modifications to the rules update existing requirements and the rules do not contain any increases to fees.

"(6) the probable costs or consequences of not adopting the proposed rule, including those costs or consequences borne by identifiable categories of affected parties, such as separate classes of government units, businesses, or individuals"

The consequences of not adopting the proposed rule modifications are

- unnecessary barriers on the path to licensure for financially disadvantaged individuals and individuals with constraints on their time such as those caused by child-rearing, which primarily although not exclusively impacts women. These historically unrepresented groups face issues finding the time and financial resources to study for and pass all section of the Uniform CPA Exam within 18 months. If a section credit expires, they must also go through the additional cost and effort of re-sitting for the previously passed section.
- unintentionally punitive CPE fees inconsistent with the current rule where "120 hours of continuing education over 3 years for maintaining competency" is the standard. Fees for noncompliance during the 3 years are a sufficient deterrent, given they accrue by month and per year of noncompliance.

"(7) an assessment of any differences between the proposed rule and existing federal regulations and a specific analysis of the need for and reasonableness of each difference"

No relationship exists between these rules and federal regulations.

"(8) an assessment of the cumulative effect of the rule with other federal and state regulations related to the specific purpose of the rule.... '[C]umulative effect' means the impact that results from incremental impact of the proposed rule in addition to other rules, regardless of what state or federal agency has adopted the other rules. Cumulative effects can result from individually minor but collectively significant rules adopted over a period of time."

Neither federal regulations nor other Minnesota state laws directly address the areas covered in the proposed rules. Therefore, this consideration is not applicable for these rules.

PERFORMANCE-BASED RULES

Minnesota Statutes, sections 14.002 and 14.131, require that the SONAR describe how the agency, in developing the rules, considered and implemented performance-based standards that emphasize superior achievement in meeting the agency's regulatory objectives and maximum flexibility for the regulated party and the agency in meeting those goals.

To safeguard life, health and property, and promote the public welfare, the Board provides reasonable assurance that persons practicing public accounting are competent, ethical practitioners qualified through education, examination and experience. Additionally, as an official licensing entity, the Board is charged with implementing those statutes and rules which specifically regulate the practice of public accounting.

The proposed rule amendments embodied in this Statement of Need and Reasonableness emphasize superior achievement in meeting the Board's regulatory objectives with maximum flexibility for the regulated party and the Board in meeting those goals. The Board has applied consistent and, where possible, national standards in its approach to examination and continuing professional education requirements. It has removed various friction points for applicants with the exam score credit change. It has eliminated ambiguity and any unintended punitive rather than appropriately deterrent effect in the reasonable collection of fees related to licensee noncompliance with continuing education requirements.

ADDITIONAL NOTICE

This Additional Notice Plan was reviewed by the Office of Administrative Hearings and approved in an order issued by Administrative Law Judge Ann O'Reilly on XXXX XX, 2024.

Copies of the Dual Notice of Intent to Adopt and the proposed rule change will be mailed to the Minnesota Association of Public Accountants ("MAPA"), a professional organization representing Certified Public Accountant members.

Copies of the Dual Notice of Intent to Adopt and the proposed rule change will be mailed to the Minnesota Society of Certified Public Accountants ("MNCPA"), a professional organization representing Certified Public Accountant members.

Copies of the Dual Notice of Intent to Adopt and the proposed rule change will be mailed to the National Association of State Boards of Accountancy ("NASBA"), the national council representing Certified Public Accountants regulated by this Board.

Copies of the Dual Notice of Intent to Adopt and the proposed rule change will be mailed to the American Institute of Certified Public Accountants ("AICPA"), a national professional organization for Certified Public Accountants.

Copies of the Dual Notice of Intent to Adopt and the proposed rule change will be mailed to the National Conference of CPA Practitioners ("NCCPAP"), a national professional organization for Certified Public Accountants.

Copies of the Dual Notice of Intent to Adopt and the proposed rule change will be mailed to the National Association of Black Accountants, Inc. ("NABA, Inc."), a national professional association including Certified Public Accountant members.

Copies of the Dual Notice of Intent to Adopt and the proposed rule change will be mailed to the National Society of Black CPAs ("NSBCPA"), a national professional association for Certified Public Accountant members.

Copies of the Dual Notice of Intent to Adopt and the proposed rule change will be mailed to the Accounting and Financial Women's Alliance, ("AFWA"), a national professional association including Certified Public Accountant members.

Copies of the Dual Notice of Intent to Adopt and the proposed rule change will be mailed to the following colleges and universities in Minnesota offering accredited degrees in accounting:

- Augsburg University
- Bemidji State University
- Bethel University
- Capella University
- College of St. Benedict
- College of St. Scholastica
- Concordia College Moorhead
- Concordia University, St. Paul
- Gustavus Adolphus College
- Hamline University
- Metropolitan State University
- Minnesota State University Mankato
- Minnesota State University Moorhead

- North Central University
- Rasmussen College
 - o Blaine Campus
 - Bloomington Campus
 - Brooklyn Park Campus
 - Eagan Campus
 - Lake Elmo/Woodbury Campus
 - Mankato Campus
 - Moorhead Campus
 - St. Cloud Campus
- Southwest Minnesota State University
- St. Catherine University
- St. Cloud State University
- St. John's University
- St. Mary's University
 - Minneapolis Campus
 - Rochester Campus
 - Winona Campus
- University of Minnesota
 - Crookston Campus
 - Duluth Campus
 - Morris Campus
 - Twin Cities Campus
- University of Northwestern St. Paul
- University St. Thomas
- Winona State University

A postcard notification of the proposed rule changes with the website address where recipients will find the Dual Notice of Intent to Adopt, the official language of the proposed rule, and the SONAR will be mailed to all current CPA certificate and RAP registration applicants.

A postcard notification of the proposed rule changes with the website address where recipients will find the Dual Notice of Intent to Adopt, the official language of the proposed rule, and the SONAR will be mailed to all current Minnesota CPA exam candidates.

A postcard notification of the proposed rule changes with the website address where recipients will find the Dual Notice of Intent to Adopt, the official language of the proposed rule, and the SONAR will be mailed to all current CPA inactive and active certificate holders and current RAP registrants.

The Board will send notice to individuals self-registered on the Board's general email bulletin list.

The Board will post the Dual Notice of Intent to Adopt, the SONAR, and the proposed rule changes on the Board's website.

Our Notice Plan includes giving notice required by statute. We will mail or email the proposed rules and the Notice of Intent to Adopt to everyone who has registered to be on the Board's rulemaking list under Minnesota Statutes, section 14.14, subdivision 1a. We will also give notice to the Legislature per Minnesota Statutes, section 14.116, and serve a copy of the SONAR on the Legislative Reference Library per Minnesota Statutes, section 14.131.

Our Notice Plan did not include notifying the Commissioner of Agriculture because the rules do not affect farming operations per Minnesota Statutes, section 14.111.

CONSULTATION WITH MMB ON LOCAL GOVERNMENT IMPACT

As required by Minnesota Statutes, section 14.131, the Board will consult with Minnesota Management and Budget (MMB). We will do this by sending MMB copies of the documents that we send to the Governor's Office for review and approval. We will do this before the Board's publishing the Notice of Intent to Adopt. The documents will include the Governor's Office Proposed Rule and SONAR Form; the proposed rules; and the SONAR. The Board will submit a copy of the cover correspondence and any response received from Minnesota Management and Budget to OAH at the hearing or with the documents it submits for ALJ review.

DETERMINATION ABOUT RULES REQUIRING LOCAL IMPLEMENTATION

As required by Minnesota Statutes, section 14.128, subdivision 1, the Board has considered whether these proposed rules will require a local government to adopt or amend any ordinance or other regulation in order to comply with these rules. The Board has determined that they do not because the compliance with the rules falls on individuals and firms licensed or seeking licensure and enforcement of the rules falls solely on the Board.

COST OF COMPLYING FOR SMALL BUSINESS OR CITY

Agency Determination of Cost

As required by Minnesota Statutes, section 14.127, the Board has considered whether the cost of complying with the proposed rules in the first year after the rules take effect will exceed \$25,000 for any small business or small city. The Board has determined that the cost of complying with the proposed rules in the first year after the rules take effect will not exceed \$25,000 for any small business or small city.

The Board has made this determination based on the probable costs of complying with the proposed rule, as described in the Regulatory Analysis sections of this SONAR.

LIST OF WITNESSES

If these rules go to a public hearing, the Board anticipates that any of the current Board members at the time of the hearing would be available for testimony in support of the need for and reasonableness of the rules. The Board does not intend to call non-agency witnesses.

RULE-BY-RULE ANALYSIS

PART 1105.2000 RETAKE AND GRANTING OF CREDIT REQUIREMENTS

Minnesota seeks to establish a window for passage of all four sections of the Uniform CPA exam which accomplishes all of the following:

- Tests applicants on the skills determined to be the minimum required for competency (preserve test validity).
- Does not create a barrier to entry (levels the path) for those historically under-represented in the profession. These include those of limited income and those for whom other responsibilities (child-rearing; other dependent care; other life circumstances) make finding the money and/or the time to prepare for and complete the exams difficult.
- Does not interfere with the ability of Minnesota licensees to become licensed in other jurisdictions.

In proposing a 30-month window, the Minnesota Board of Accountancy has carefully considered all these factors.

Background:

Prior to Minnesota Rules, 1105 (2003), applicants were required to sit for all four sections of the Uniform CPA Exam ("the exam") in one sitting. If they failed more than 2 of the 4 sections, they needed to retake all the sections, which they could not immediately do (must wait for the following administration). Otherwise, they could retake the remaining sections but must pass those within the next 5 administrations of the exam or they would again need to sit for all the sections. The exams were administered twice per year on specific dates. This created the net effect of a 30-month exam window. However, it also required the candidate to be available on very specific dates, a potential hardship if life interfered with the exam administration calendar. In 2003, along with the computerization of the exam, applicants were allowed to sit for just a single section and had an 18-month window to eventually pass all the sections.

The work of CPAs, particularly but not limited to those conducting audit work, has become increasingly complicated even over the last decade (see AICPA/NASBA Joint article, 2001, <u>https://egrove.olemiss.edu/cgi/viewcontent.cgi?article=1155&context=aicpa_exam</u> and Journal of Accountancy article, 2015, <u>https://www.journalofaccountancy.com/news/2015/sep/cpa-exam-</u>

proposed-changes-201512929.html). The profession requires a much more sophisticated skill set, including information technology skills and statistical understanding. The exam needed to evolve to reflect that, as did degree coursework and hands-on experience (another requirement of licensure). Most recently, a new exam/exam structure was developed and launched in January 2024 (see AICPA 2020 Practice Analysis Final Report,

https://us.aicpa.org/content/dam/aicpa/becomeacpa/cpaexam/downloadabledocuments/practiceanalysis-final-report-2020.pdf).

Citing that higher skill requirement, the expense of higher education, and the desire not to leave historically underrepresented individuals with an increasingly steeper path to climb to achieve licensure, the National Association of State Boards of Accountancy (NASBA) recognized the need to expand the exam window beyond 18 months. NASBA leadership first proposed a 24-month window in February 2023 as a change to the Uniform Accountancy Act (model law guidance which states may or may not choose to follow).

However, the response from states and other interested parties to the UAA draft proposal was resoundingly negative by the. A 24-month window was still deemed insufficient. From this, a 30-month compromise quickly arose, and a 30-month window was adopted as model law in April 2023 (see NASBA announcement, April 2023, <u>https://nasba.org/wp-content/uploads/2023/04/UAA-Model-Rule-Announcement_Final-.pdf</u>).



Most states have since worked to adopt the 30-month window, as their rule processes allow (see NASBA chart, dated December 14, 2023):

The Minnesota Board had originally voted to adopt a 36-month window at a meeting in early 2023, but as the overwhelming majority of states have already adopted or proposed to adopt the 30-month window as that is now model law (see chart below), the Board voted at its March 6, 2024, meeting to adopt the 30-month window.

A 30-month window achieves these important goals:

- 1. It significantly levels the path to licensure for candidates whose financial and personal circumstances make passing the exam in the shorter timeframe a potential hardship
- 2. It ensures that future Minnesota licensees/examinees are unlikely to encounter issues with gaining reciprocal licensure in another jurisdiction.
- 3. By changing the date that signals the start of the window from the date the exam was "sat" to the date AICPA releases the score (a uniform, established date for all candidates nationwide who sat for the exam within a particular set of dates and able to be exactly defined), the window for Minnesota candidates will be substantially equivalent to that of any state adopting the UAA language.

PART 1105.2560 RENEWAL OF CERTIFICATES

Item C contains a reference to part 1105.3000 that must be updated from item "J" to item "K" due to the proposed changes to that part.

PART 1105.3000, CONTINUING EDUCATION REQUIREMENTS

In the Board's most recent rule package, changes were made to create a uniform and maximum 120hour, three-year rolling CPE requirement to maintain competency as an Active status CPA. While that language would seem to make it sufficiently clear that the CPE delinquency fee accrual in part 1105.3000, item E applies only to the most recent 120-hour/three-year period necessary to move from expired to Active status, there is room for misinterpretation, especially due to history:

Prior to the 2023 rule changes and a 2022 statute change, an individual whose license was expired would have been accountable all applicable fees if they requested license reactivation. However, by statute, an individual whose license was expired for more than two years automatically had their licensed revoked (no longer "expired" but "revoked"). Under auto revocation, no individual expired for more than two years *could* renew; they would instead request *reinstatement*, a different process resulting in the issuance of an Order for Reinstatement by the Board. The 2022 statute change removed the automatic revocation provision. The 2023 rule changes created a maximum 120-hour/ three-year rolling CPE requirement.

It is possible to interpret the part 1105, 3000, item E, as applying to *all years of nonrenewal*, which was not the Board's intent. The maximum possible required fee for noncompliance intended under the new rule is \$1425 (worse-case noncompliance over three years). That is sufficient to deter individuals from attempting to step in and out of licensure to avoid the CPE requirement altogether. The Board

considers an accrual that would be in excess of the three years as inconsistent with the intent of the rest of CPE rule requirements and potentially punitive, particularly for individuals who simply left the CPA practice and now wish to return to it much later.

To avoid the potential for misinterpretation or misapplication, the Board proposes Item F, which makes the cap on CPE noncompliance fees explicit.

CONCLUSION

Based on the foregoing, the proposed rules are both needed and reasonable.

Date

Doreen Johnson Executive Director

| | 02/29/24 | REVISOR | BD/HL | RD4851 | | | |
|------------|---------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------|---------------------------------|------------------------------|--|--|--|
| 1.1 | Board of Accountancy | | | | | | |
| 1.2 1.3 | • | s Governing Examination C ducation Late Processing Fe | - | nts and | | | |
| 1.4 | 1105.2000 RETAKE ANI | O GRANTING OF CREDIT | REQUIREMEN | ГS. | | | |
| 1.5 | [<u>For</u> | text of subpart 1, see Minneso | <u>ota Rules]</u> | | | | |
| 1.6 | Subp. 2. Examination | requirements. | | | | | |
| 1.7 | A. An applicant m | ay take the required examinat | tion sections indivi | idually and in | | | |
| 1.8 | any order. Credit for any section passed shall be valid for $\frac{18}{30}$ months from the actual date | | | | | | |
| 1.9 | | ease date for the section that t tain a minimum score on any | | hat section | | | |
| 1.10 | section and without regard t | o whether the applicant has ta | ken other sections | , regardless of | | | |
| 1.11 | the date that the applicant ac | ctually receives notice of the p | bassing grade. In ad | ddition: | | | |
| 1.12 | (1) an applica | nt must pass all four sections | of the Uniform Ce | ertified Public | | | |
| 1.13 | Accountant Examination wi | thin a rolling 18-month <u>30-m</u>o | onth period, that be | egins on the | | | |
| 1.14 | date the AICPA releases the | score for that the first section | or sections passed | l are taken ; and | | | |
| 1.15 | <u>[For t</u> | <u>ext of subitem (2), see Minnes</u> | <u>sota Rules]</u> | | | | |
| 1.16 | B. In the event that | t <u>the applicant does not pass</u> a | all four sections of | the Uniform | | | |
| 1.17 | Certified Public Accountant | Examination are not passed v | within the rolling 1 | 8-month | | | |
| 1.18 | <u>30-month</u> period, credit for an <u>described in item A</u> expires | ny section passed outside the 4 | 8-month_30-month_ | period <u>as</u> | | | |
| 1.19 | and the applicant must retak | <u>e</u> that section must be retaken | . . | | | | |
| 1.20 | [For tex | ct of subparts 3 to 5, see Minn | esota Rules] | | | | |
| 1.21 | 1105.2560 RENEWAL O | F CERTIFICATES. | | | | | |
| 1.22 | [For te. | xt of items A and B, see Minne | esota Rules] | | | | |
| 1.23 | C. Notwithstandin | g the renewal period establish | ned by this part and | l except as | | | |
| 1.24 | provided for in part 1105.30 | 00, item <u>J K</u> , on each June 30 | , licensees holding | a certificate | | | |
| | 1105.2560 | 1 | | | | | |

| | 02/29/24 | REVISOR | BD/HL | RD4851 | | | |
|------|--------------------------------------------------------|-----------------------------|--------------------------|----------------|--|--|--|
| 2.1 | with an "active" status must comply wi | th the one- and thr | ee-year continuing p | professional | | | |
| 2.2 | education requirements in part 1105.3000. | | | | | | |
| 2.3 | 1105.3000 CONTINUING PROFES | SIONAL EDUCA | ATION REQUIRE | MENTS. | | | |
| 2.4 | The requirements of continuing pr | ofessional education | on in items A to J ap | ply pursuant | | | |
| 2.5 | to Minnesota Statutes, section 326A.04, subdivision 4. | | | | | | |
| 2.6 | [For text of items | A to E, see Minne | <u>sota Rules]</u> | | | | |
| 2.7 | F. Notwithstanding item E, th | ne maximum late p | rocessing fee must b | e no more | | | |
| 2.8 | than the accrued fee for the three-year C | CPE reporting cycle | e associated with the | renewal that | | | |
| 2.9 | will reestablish the license as valid, as o | defined in part 110 | 5.6550, item A. | | | | |
| 2.10 | F <u>G</u> . A licensee electing to ch | hange the status of | the licensee's certified | cate from a | | | |
| 2.11 | status of "active" to a status of "inactive | " or "exempt," or re | equesting to change | the licensee's | | | |
| 2.12 | status from "active" to "retired" must: | | | | | | |
| 2.13 | (1) notify the board of the | e request in writing | on a form provided | by the board; | | | |
| 2.14 | and | | | | | | |
| 2.15 | (2) provide the board with | n documentation sł | nowing completion o | f a minimum | | | |
| 2.16 | of 120 hours of CPE required under thi | s chapter during th | ne three-year period | ended June | | | |
| 2.17 | 30 preceding the effective date of the sta | atus change, with a | n minimum of 20 hou | ırs each year. | | | |
| 2.18 | The change in status from "active" to " | inactive" is effectiv | ve on January 1 follo | owing | | | |
| 2.19 | completion of subitems (1) and (2). | | | | | | |
| 2.20 | G H. Notwithstanding item F | <u>G</u> , a licensee reque | sting "exempt" or "re | etired" status | | | |
| 2.21 | who is in compliance with CPE and rer | newal requirements | s as of the prior rene | wal period | | | |
| 2.22 | has no CPE requirement under this chap | ter if the licensee su | lbmits a request for s | tatus change | | | |
| 2.23 | on or before June 30. | | | | | | |

2

| | 02/29/24 | REVISOR | BD/HL | RD4851 | | | |
|------|------------------------------------------------------------------------------------------|----------------------------|---------------------------------------|---------------------|--|--|--|
| 3.1 | H <u>I</u> . A change in status af | ter completing the req | uirements in item $F_{\underline{0}}$ | <u>G</u> , subitems | | | |
| 3.2 | (1) and (2), is effective as follows: | | | | | | |
| 3.3 | (1) for "inactive" stat | us, January 1; and | | | | | |
| 3.4 | (2) for "exempt" and | "retired" status, the dat | te that the properly su | ubmitted and | | | |
| 3.5 | eligible status change request is processed by the board, which must be no more than ten | | | | | | |
| 3.6 | business days after the receipt of the | e change request. | | | | | |
| 3.7 | <u>IJ</u> . An individual who wa | s previously granted " | retired" status under | · Minnesota | | | |
| 3.8 | Statutes, section 326A.045, who ele | ects to change to an "ir | nactive" status must 1 | notify the | | | |
| 3.9 | board of the request in writing on a | form provided by the | board. The change in | n status is | | | |
| 3.10 | effective January 1. | | | | | | |
| 3.11 | J <u>K</u> . The following require | ements apply to licens | ees granted an initial | l certificate | | | |
| 3.12 | with an active status. | | | | | | |
| 3.13 | (1) Licensees receiving | ng their initial certific | ate between January | 1 and June | | | |
| 3.14 | 30: | | | | | | |
| 3.15 | (a) are exempt fr | om the CPE requireme | ent for the CPE period | d ended June | | | |
| 3.16 | 30 in the same year as the date the i | nitial certificate was g | granted; | | | | |
| 3.17 | (b) must comple | te the 20-hour require | ment in item A by Ju | ine 30 of the | | | |
| 3.18 | year following the date the initial co | ertificate was granted; | and | | | | |
| 3.19 | (c) must comple | te the 120-hour requir | ement in item A by t | he June 30 | | | |
| 3.20 | three years after the date in which the | ne initial certificate wa | as granted. | | | | |
| 3.21 | (2) Licensees receiving | ng their initial certifica | ate between July 1 an | d December | | | |
| 3.22 | 31: | | | | | | |
| 3.23 | (a) are exempt fr | om the CPE requireme | ent for the CPE period | d ended June | | | |
| 3.24 | 30 in the year following the date the | - | - | | | | |
| | | | | | | | |

3

4.4 years after the date in which the initial certificate was granted.



85 East 7th Place, Suite 125, St. Paul, MN 55101-2143 Ph: 651-296-7938 • Email: boa@state.mn.us • boa.state.mn.us

| APPLICATION | FOR MINNESOTA |
|-------------|---------------|



CPA FIRM PERMIT Permit Fee: \$100

NOTE: Incomplete applications (not all required materials submitted) expire six months from receipt by the Board.

1. Firm Contact Information

2.

3.

4.

| City4021 NC Hig | ghway 43 | VANCEBORD | Main Phone 919-215-7708 |
|----------------------------------------|--------------------------------------------|--------------------------------------------------------|------------------------------------------------------------------------------------------|
| State North Caro | olina | Zip | FEIN # or MN Taxpayer ID # |
| Name of Manager / Partner in Charge | Daniel | Purvine | MN Certificate # (if applicable) |
| | (Legal First) | (Last) | |
| | (Legal First) | (Last) | |
| Does your fir | | nore than one office i | n Minnesota? |
| | m have m | nore than one office i | n Minnesota? No Yes |
| If yes, attach a sl | m have m heet listing t | nore than one office i the addresses for all office | s and the person in charge at each. |
| If yes, attach a sl | m have m heet listing t | nore than one office i the addresses for all office | s and the person in charge at each. |
| If yes, attach a sl | rm have m heet listing t late the fi | nore than one office i the addresses for all office | s and the person in charge at each. 7/2012 DD/YYYY) and select the firm type below |

5. List all CPA and RAP Partners, Members, Managers, Shareholders, Directors, and Officers ("Owners") at your firm and provide the requested detail. Attach list, if necessary.

| CPA (or RAP) Owner Name | Minnesota CPA Certificate or RAP Registration # (if applicable) | If no MN license, list a state where owner has current active license | Practici Minnes | |
|-------------------------|--------------------------------------------------------------------------|--------------------------------------------------------------------------------|--------------------|----|
| Daniel Purvine | | North Carolina | • Yes | No |
| | | | Yes [| No |
| | | | Yes | No |
| | | | Ves | No |

Note: MN Statute 326A.05, Subcl. 6 requires you to notify the Board of any change in ownership or number or location of offices within Minnesota within 30 days of its occurence.

6. List of Minnesota resident non-CPA/non-RAP owners:*

| | * Be sure to complete a Non-CPA/Non-RAP Owner of Firm Statement (page 5) and enclose the \$45.00 fee for each individual listed. |
|---|----------------------------------------------------------------------------------------------------------------------------------|
| | |
| | |
| ÷ | Non-CPA/non-RAP owners—resident and nonresident combined— hold, in total, what percentage of: |
| | Voting interest in the firm? $\frac{0}{2}$ % Financial interest in the firm? $\frac{0}{2}$ % |
| | Does your firm hold or has it applied for a permit in any state other than Minnesota? |
| | NC, PA, AR, KS, OR, AK, CA, GA, NE, WY |
| | If you answered "yes" to Question 7, was your |
| | permit/permit application in any of these states revoked, suspended, or denied? |
| • | DESIGNATION AFFIDAVIT FOR FIRM PERMIT APPLICATION |
| | Read all statements and sign the affidavit below. |
| | 1. The firm has verified that all CPA owners, partners, shareholders, members, managers, directors and officers of |

- the firm who have their principal place of business located in Minnesota have an active certificate.
 All attest and compilation services rendered by the firm in this state are under the charge of a person holding a valid certificate with an active status or a person who has been granted practice privileges under Minnesota Statute §326A.14 (2022).
- 3. The firm has an audit documentation retention and destruction policy that complies with Minnesota Rules 1105.7850.G (2023).
- 4. The firm has verified that—if applicable—all Minnesota non-CPA/non-RAP owners have completed a Minnesota Non-CPA/Non-RAP Owner of Firm Statement and registered with the Board.
- 5. All individual employees of the firm who have been granted practice privileges under Minnesota Statute §326A.14 (2022), or who hold certificates and reside or practice in this state and those persons specified in part 1105.4000.E (2023), who are responsible for supervising attest or compilation services or who sign or authorize someone to sign an accountant's report on financial statements have met the competency requirements set out in professional standards.

| Affidavit: I swear or affirm that I have read the foregoing application and that the statements are true and complete. | | | | | | |
|---------------------------------------------------------------------------------------------------------------------------|------------------------------------------|------|--|--|--|--|
| Printed Name of Partner/Shareholder/Officer | Signature of Partner/Shareholder/Officer | Date | | | | |
| Daniel Purvine Daniel Parine 2/23/2024 | | | | | | |

FIRM PEER REVIEW STATEMENT

| 1. | Did/will your firm do work under the following standards | ? | Currei | nt Ye | ar | | Next | Year | ٢ |
|----|---------------------------------------------------------------------|---|----------|-------|----|---|------|------|----|
| | Statements on Auditing Standards (SAS) | • | Yes | | No | • | Yes | | No |
| | Statements on Standards for Accounting and Review Services (SSARS)* | |] Yes | • | No | | Yes | • | No |
| | Statements on Standards for Attestation Engagements (SSAE) | | Yes | | No | | Yes | | No |
| | Generally Accepted Government Auditing Standards (the Yellow Book) | • | Yes | | No | • | Yes | | No |
| | PCAOB Auditing Standards | | Yes | • | No | | Yes | • | No |

* Excludes engagements done under SSARS No. 21, AR-C section 70

 $_$ If you answered "No" to all items in question 1, sign the affidavit below, then skip to the next page. ____

| | ot perform attest or compilation services and does not plan to do so in the | | | | |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------|--|--|--|--|
| | vill notify the Minnesota Board of Accountancy within 30 days. Therefore m | | | | |
| firm is exempt from peer review requirements. I further certify that this information is correct and understand misrepresentation may result in disciplinary action against my certificate and/or the firm permit. | | | | | |
| Signature | 2 | | | | |
| Daniel Purvine | 2/23/24 | | | | |
| Printed Name | Date | | | | |

| | If you answered " | /es" to <mark>any</mark> ite | em in question | 1 above, co | omplete | questions a | 2-5 Delow |
|------------------------|----------------------------------------------------------------------------------------------|------------------------------------|------------------------------------------------------------------------------|---------------------|----------------------------------------|----------------------------------------------|-----------|
| | to und | lergo a peer revie | <u>5 Subd. 8</u> and <u>MN</u> ew with respect to pating in a peer rev | the nonpubl | ic company | practice. | |
| | our firm register | | | mpany | | —] | |
| Ac | ounting Oversig | jht Board (| PCAOB)? | | | └── Yes | L No |
| lf ye | : A. What year was it B. When was the las (If none released, | t review report o | on your public prac | tice released: | by the PCA | NOB? | |
| | icate the Report | Acceptanc | ce Body (RA | .B) you ai | re/will | be worki | ng with: |
| Inc | • | | | | | | |
| | | PA | | Other | (specify): | | |
| \checkmark | AICPA AICPA AICPA | iod will be | reviewed du | iring you | ır initial | required | • |
| WI 4 | AICPA AICPA AICPA | iod will be | | iring you | ır initial | required | • |
| WI 4 (Beg | AICPA AICPA AICPA | iod will be 13 ginning Year) | reviewed du to (Ending N | Iring you Aonth) | ır initial _/ <u>2014</u> (Endin | required 3 Year) | |
| WI 4 (Beg Aff | AICPA MA at 12-month per / 20 nning Month) / (Be davit: I certify that Junity | iod will be 13 ginning Year) | reviewed du to (Ending N | Iring you Aonth) | ır initial _/ <u>2014</u> (Endin | required ^{g Year)} nd accurat | e. |
| WI 4 (Beg Aff | AICPA MA at 12-month per nning Month) / 20 (Be davit: I certify that | iod will be 13 ginning Year) | reviewed du to (Ending N | Iring you Aonth) | ır initial _/ <u>2014</u> (Endin | required ^{g Year)} nd accurat | |

WORKERS' COMPENSATION LIABILITY CERTIFICATE OF COMPLIANCE

1. Firm Information

| Firm Name D.L. Purvine, CPA, PLLC | |
|-----------------------------------|-----|
| Contact Name Daniel Purvine | |
| Address PO Box 2027 | |
| City Lake Placid | |
| State Florida | Zip |

2. Mark the applicable option (A or B) and provide the requested details.

| ✓ | Α. | I have workers' compensation liability coverage, and below is information regarding it: Insurance Company: | | | | |
|---|----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|---------------------|--|--|
| | | | | | | |
| | | 02 WBC AH50DT | Dates of Coverage: | 8/29/23 - 8/29/2024 | | |
| | в. | I am not required to have workers' comp | ensation liability cover | rage because: | | |
| | | The firm has no employees. | | | | |
| | | I have no employees who are covered by the workers' compensation law. (Employed spouses, parents, and children are <u>exceptions</u> to coverage requirements.) | | | | |
| | | I am self-insured and am including a copy of my permit to self-insure w | | | | |

3. Affidavit:

I certify that the information provided above is complete and accurate.

Signature

2/23/24

Date

Note: <u>Minnesota Statute 176.182</u> requires every state and local agency to withhold the issuance or renewal of a license or permit to operate a business or engage in an activity in Minnesota until the applicant presents acceptable evidence of compliance with workers' compensation insurance coverage. If this information is not provided or is falsely stated, it may result in a penalty assessed against the applicant by the Commissioner of the Department of Labor and Industry. This information will be collected by the licensing agency and retained in their files.

Office of the Minnesota Secretary of State Certificate of Authority

I, Steve Simon, Secretary of State of Minnesota, do certify that: The following business entity has duly complied with the relevant provisions of Minnesota Statutes listed below, and is formed or authorized to do business in Minnesota on and after this date with all the powers, rights and privileges, and subject to the limitations, duties and restrictions, set forth in that chapter.

The business entity is now legally registered under the laws of Minnesota.

| Name in Minnesota: | D.L. Purvine, CPA P. L. L. C. |
|--------------------------------------|-------------------------------|
| Name in Home Jurisdiction: | D.L. Purvine, CPA P. L. L. C. |
| File Number: | 1454820800022 |
| Minnesota Statutes, Chapter: | 322C |
| Home Jurisdiction: | North Carolina |
| This certificate has been issued on: | 02/12/2024 |



Ateve Dimm

Steve Simon Secretary of State State of Minnesota



6025 SOUTH QUEBEC STREET, SUITE 260 CENTENNIAL, COLORADO 80111 303-792-3020 (0) | 303-792-5153 (F) WWW.WCRCPA.COM

Report on the Firm's System of Quality Control

September 19, 2023

To the Shareholders of D.L. Purvine, CPA, PLLC and the Peer Review Committee of Coastal Peer Review, Inc.

We have reviewed the system of quality control for the accounting and auditing practice of D.L. Purvine, CPA, PLLC (the firm) in effect for the year ended March 31, 2023. Our peer review was conducted in accordance with the Standards for Performing and Reporting on Peer Reviews established by the Peer Review Board of the American Institute of Certified Public Accountants (Standards).

A summary of the nature, objectives, scope, limitations of, and the procedures performed in a system review as described in the Standards may be found at www.aicpa.org/prsummary. The summary also includes an explanation of how engagements identified as not performed or reported on in conformity with applicable professional standards, if any, are evaluated by a peer reviewer to determine a peer review rating.

Firm's Responsibility

The firm is responsible for designing and complying with a system of quality control to provide the firm with reasonable assurance of performing and reporting in conformity with the requirements of applicable professional standards in all material respects. The firm is also responsible for evaluating actions to promptly remediate engagements deemed as not performed or reported on in conformity with the requirements of applicable professional standards, when appropriate, and for remediating weaknesses in its system of quality control, if any.

Peer Reviewer's Responsibility

Our responsibility is to express an opinion on the design of and compliance with the firm's system of quality control based on our review.

Required Selections and Considerations

Engagements selected for review included engagements performed under Government Auditing Standards.

As a part of our peer review, we considered reviews by regulatory entities as communicated by the firm, if applicable, in determining the nature and extent of our procedures.

Opinion

In our opinion, the system of quality control for the accounting and auditing practice of D.L. Purvine, CPA, PLLC in effect for the year ended March 31, 2023, has been suitably designed and complied with to provide the firm with reasonable assurance of performing and reporting in conformity with applicable professional standards in all material respects. Firms can receive a rating of pass, pass with deficiency(ies), or fail. D.L. Purvine, CPA, PLLC has received a peer review rating of pass.

Watson Coon Ryan, LLC

Watson Coon Ryan, LLC





October 19, 2023

Daniel Purvine D.L. Purvine, CPA, PLLC 4021 NC Hwy 43 Vanceboro, NC 28586-8539

Dear Daniel Purvine:

It is my pleasure to notify you that on October 19, 2023, the Coastal Peer Review, Inc. Committee accepted the report on the most recent System Review of your firm. The due date for your next review is September 30, 2026. This is the date by which all review documents should be completed and submitted to the administering entity.

As you know, the report had a peer review rating of pass. The Committee asked me to convey its congratulations to the firm.

Thank you for your cooperation.

For North Carolina firms: To comply with North Carolina Administrative Code (21 NCAC 8M .0106), within 60 days of the date of this final letter of acceptance, you must forward a copy of it to: Cammie Emery NC State Board of CPA Examiners PO Box 12827 Raleigh, NC 27605 fax 919.733.4209 – cemery@nccpaboard.gov (The preferred method of receipt is fax or email. No cover letter is required.) If the result of this peer review is fail or a second pass with deficiencies, you are also required to submit the report and letter of response.

Sincerely,

Michael P. Manspeaker

Michael P. Manspeaker, CPA CPA on Staff peerreview@coastalpeerreview.org 800-730-3412

cc: Troy Coon

Firm Number: 900007890840

Review Number: 601031





March 6, 2024

Dear State Board Chair/President and Executive Director:

This letter will officially communicate information regarding candidate fees for the Uniform CPA Examination ("Examination") for calendar year 2025 and serve as a reminder regarding 2024 fees.

Prometric Fees

As announced in last year's February 7, 2023 fee letter, effective January 1, 2024, the final Prometric biannual COLA adjustment of the current contract which expires on December 31, 2024 went into effect. As such, the Prometric hourly fee increased from \$21.21 to \$22.06 and the Prometric security fee per exam section increased from \$6.31 to \$6.56 on January 1, 2024.

Contract negotiations remain underway with Prometric to finalize new contract provisions and terms which will be effective on January 1, 2025. We are pleased to announce, however, that the 2025 fees have been negotiated. Going forward Prometric fees will be simply on a per testing event basis. Given this, the Prometric fee per test section (for standard seat time) will be \$97.64 for 2025. This includes both the seat time and the security fee.

AICPA Fees

As also announced in the fee letter of February 7, 2023, the AICPA per section examination fee increased from \$120.00 to \$130.00 on January 1, 2024. The AICPA per section examination fee will increase from \$130.00 to \$135.00 beginning January 1, 2025.

NASBA Fees

The NASBA fee per examination section increased from \$27.00 to \$30.00 beginning January 1, 2024, as also announced in the February 7, 2023 fee letter. The NASBA per section fee will remain at \$30.00 for 2025.

Implementation Schedule

The following table summarizes the current 2024 fees and the 2025 fees.

| Year | NASBA | AICPA | Prometric Hourly | Prometric |
|------|-------------|-------------|------------------|--------------|
| | Section Fee | Section Fee | Fee | Security Fee |
| 2024 | \$30.00 | \$130.00 | \$22.06 | \$6.56 |
| Year | NASBA | AICPA | Prometric | Prometric |
| | Section Fee | Section Fee | Section Fee | Security Fee |
| 2025 | \$30.00 | \$135.00 | \$97.64 | N/A |

The candidate cost per section (AUD, FAR, REG, BAR, ISC and TCP) is \$254.80 and \$262.64 in 2024 and 2025, respectively. The listed costs are for standard seat time. As a reminder, the cost per section is the same for all core and discipline sections, as all sections are four hours in length.

Patricia Hartman, Director, Client Services at NASBA will provide information on the implementation of the new fee schedule later this month.

Sincerely,

Michael Decker AICPA Vice President, Examinations and Pipeline

Michael A Derken Missy Bydo

Missy Pydo Prometric Vice President, Growth Leader North America

Colleen K. Conrad **NASBA Executive Vice** President & Chief Operating Officer



BOARD MEMORANDUM

March 6, 2024

- TO: Executive Committee Charles Selcer, CPA, Board Chair Chas McElroy, CPA, Vice Chair Godson Sowah, CPA, Secretary/Treasurer
- FROM: Charles Selcer, CPA, Board Chair

SUBJECT: MARCH 6, 2024, EXECUTIVE COMMITTEE MINUTES GOLDEN RULE BUILDING, Suite 295 8:20 AM

The Executive Committee met on the above-mentioned date, time and location.

CALL TO ORDER Charles Selcer, CPA, Board Chair Chas McElroy, CPA, Vice Chair (ABSENT) Godson Sowah, CPA, Secretary/Treasurer

OTHERS: Doreen Johnson, Executive Director Kay Weiss, Assistant Executive Director

GUESTS:

Troy Olson, Minnesota Association of Public Accountants (MAPA) Linda Wedul, Minnesota Society of Certified Public Accountants (MNCPA)

- 1) APPROVAL OF THE JANUARY 18, 2024, EXECUTIVE COMMITTEE MEETING MINUTES MSP: To Approval of the January 18, 2024, meeting minutes
- 2) UNFINISHED BUSINESS
 - A) Internal Controls Discussed.
- 3) NEW BUSINESS
 - A) CPE Audits Staff have begun FY23 audits.
 - B) System Updates for New Exam Disciplines Underway.

- C) NASBA Update on Credit Extensions for Exam Transition Extensions are now visible to candidates.
- D) MNCPA Bill on Education Requirements for CPAs Hearing in Senate Committee at 1pm on Thursday, March 7, 2024. The Executive Director was not put on the agenda by the committee to testify. A fiscal note is attached to this bill.
- E) AICPA Board of Examiners Charles Selcer attended a meeting where statistics were provided about examinees who have sat since the new exam launch and score release schedule. Discussed.
- 4) ADJOURN MSP: To adjourn at 8:45 AM

Next Meeting: May 2, 2024