



Colegio de Contadores Públicos Autorizados de Puerto Rico

Protegemos el bienestar económico de nuestro pueblo

28 de febrero de 2012

Hon. Carmelo Ríos
Presidente
Comisión de Gobierno
Senado de Puerto Rico
San Juan, PR 00902-3431

Estimado representante y miembros de la Comisión:

Comparece ante la Honorable Comisión de Gobierno del Senado de Puerto Rico el Colegio de Contadores Públicos Autorizados de Puerto Rico para presentar sus comentarios en relación al Proyecto del Senado 2477. Este proyecto de ley propone enmendar la Sección 3 de la Ley de Contabilidad Pública Núm. 293 de 20 de mayo de 1945, según enmendada, a los efectos de añadir el subinciso (g) y un subinciso (h) a la referida Sección de establecer los requisitos de experiencia profesional para la solicitud de licencia de Contador Público Autorizado; y establecer el beneficio de diez (10) horas crédito de educación continua para los Contadores Públicos Autorizados que provean empleo y supervisión directa a candidatos a obtener la licencia de CPA

El Colegio de CPA está de acuerdo con el propósito perseguido por este proyecto de ley. Coincidimos con el fin de atemperar la disposición de ley aplicable a Puerto Rico con aquellas jurisdicciones que ya han implantado el modelo de Contabilidad Pública adoptada y endosada por el Instituto Americano de Contadores Públicos Autorizado ("AICPA", por su siglas en inglés) y la Asociación Nacional de Juntas Estatales de Contabilidad ("NASBA", por su siglas en inglés). De esta manera se facilita la reciprocidad entre estados y jurisdicciones, permitiendo el reconocimiento de los contadores públicos autorizados y su desarrollo profesional.

Estamos de acuerdo con el texto propuesto ya que la enmienda propuesta está conforme a los requisitos establecidos por el AICPA y NASBA. Estas entidades recomiendan un requisito general de un (1) año de experiencia profesional en la práctica pública, privada, industria o academia. Aunque existe variedad en el término del requisito de experiencia profesional implantado entre los estados. El AICPA y NASBA recomiendan que se considere el requisito general de un año, a fin de salvaguardar la uniformidad y la movilidad. Adjuntamos, para su conocimiento y referencia, dos documentos que sustentan este planteamiento.

Pág. 2

Hon. Carmelo Ríos
Presidente
Comisión de Gobierno
28 de febrero de 2012

Por lo antes expuesto, el Colegio de Contadores Públicos Autorizados de Puerto Rico endosa la aprobación de este proyecto de ley.

Agradecemos la oportunidad que nos brindan para presentar nuestros comentarios sobre el P. del S. 2477. Estamos a su disposición para contestar cualquier pregunta o aclarar la información aquí expuesta.

Atentamente,

A handwritten signature in black ink, appearing to be 'D. Flores', written over a horizontal line.

CPA Denisse Flores Caldera
Presidente

Anejos

Uniform Accountancy Act – Fifth Edition

Section 5 (f)

An applicant for initial issuance of a certificate under this Section shall show that the applicant has had one year of experience. This experience shall include providing any type of service or advice involving the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills all of which was verified by a licensee, meeting requirements prescribed by the Board by rule. This experience would be acceptable if it was gained through employment in government, industry, academia or public practice.

COMMENT: Before an applicant may obtain a certificate, the applicant must obtain actual experience; however, that experience can be obtained in any area of employment involving the use of accounting or business skills. In addition, experience should be acceptable whether it is gained through employment in government, industry, academia or public practice. The experience may be supervised by a non-licensee but must be verified by a licensee.

Uniform Accountancy Act Model Rules

Rule 6-2 - Experience required for initial certificate.

The experience required to be demonstrated for issuance of an initial certificate pursuant to Section 5(f) of the Act shall meet the requirements of this rule.

- (a) Experience may consist of providing any type of services or advice using accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills.
- (b) The applicant shall have their experience verified to the Board by a licensee as defined in the Act or from another state. Acceptable experience shall include employment in industry, government, academia or public practice. The Board shall look at such factors as the complexity and diversity of the work.
- (c) One year of experience shall consist of full or part-time employment that extends over a period of no less than a year and no more than three years and includes no fewer than 2,000 hours of performance of services described in subsection (a) above.

EXPERIENCE REQUIREMENT

- ISSUE:** What type of experience requirement is necessary for a CPA to become licensed into the profession?
- BACKGROUND:** Every licensing jurisdiction in the U.S. except Puerto Rico has an experience requirement in place for initial licensure. About half the states have a provision similar to the Uniform Accountancy Act (UAA), which is a one year general experience requirement which can be met with experience in government, industry, academia or public practice verified by a licensee. While other states have experience requirements in place, they do vary in some significant ways from the model requirement set out in the UAA. Among the common variations from the UAA model are states that give unequal qualifying preference to different types of experience, states that require more than one-year of experience, states that require additional experience in order to perform attest services, and states that tie their experience requirement to the education requirement (i.e. less experience needed based on the higher level of education achieved).
- WHY IT'S IMPORTANT TO CPAs:** Along with the 150 hour education requirement and passage of the CPA exam, a professional experience requirement is considered one of the essential core "three E's" necessary for licensure. Inclusion of a professional experience requirement for licensure assures that CPAs are well prepared and able to accommodate the evolving skills needed in a global economy, and helps assure the public is served by a qualified professional. As most states have now enacted CPA mobility, the need for uniform experience requirements among the states has become an issue of concern. States that have requirements different from the UAA may present additional obstacles to initial licensure and interstate practice.
- AICPA POSITION:** The AICPA supports a one-year broad-based experience requirement for initial licensure. This requirement has been incorporated into the UAA and is included within the concept of substantial equivalency (UAA- Section 23). The concept contains basic criteria for initial licensure as a CPA, including 1) 150 semester hours of education, including a baccalaureate degree, 2) successfully passing the Uniform CPA Examination, and 3) at least a one year general experience requirement verified by a licensee, which is broadly defined to accommodate experience in all fields of employment (i.e., public accounting, industry, education, government, etc.).
- The "public accounting" experience requirement, contained in previous editions of the UAA, was restrictive and did not reflect today's environment for CPA services.
- STATE ACTION:** AICPA continues to work with states to encourage them to move closer to the UAA one-year general experience requirement. Colorado will move to the UAA experience requirement with new rules to take effect at the end of 2010, and Delaware will have new provisions in line with the UAA effective in 2012. Michigan has legislation currently pending to move their current one- experience requirement to the UAA by allowing industry experience to qualify. Montana is also moving towards the UAA's general provision with pending rules that could take effect next year, and Vermont is considering changes to also move their experience requirement more closely in line with the UAA.

**AICPA STAFF
CONTACTS:**

Aaron Castelo, State Regulation and Legislation, 202/434-9261