November 12, 2015

Mr. Craig Cellini  
Illinois Department of Financial  
and Professional Regulation  
320 W. Washington Street, 3rd Fl.  
Springfield, IL 62786  

In re: Support and Comments—IDFPR Proposed Rules  
Illinois Public Accounting Act, 68 Ill. Adm. Code 1420

Dear Mr. Cellini:

I am writing today on behalf of the 23,000 members of the Illinois CPA Society regarding the Illinois Department of Financial and Professional Regulation (IDFPR) rule changes to 68 Ill. Adm. Code 1420, 39 Ill. Reg. 13889, published on October 23, 2015 in the Illinois Register. The proposed changes reflect updates to the Illinois Public Accounting Act sunset reauthorization and include updated authoritative citation references and contemporary accounting standards. These proposed changes will assist the department in exercising regulatory oversight of the accounting profession and CPA licensees in compliance areas.

The Illinois CPA Society is supportive of the changes outlined in the above cited Illinois Register. We would, however, like to request consideration for revisions in two areas.

Section 1420.10 Experience

Published Version

a). The Department of Financial and Professional Regulation—Division of Professional Regulation (Division) may shall license individuals who have received CPA certificates issued by the Board (see 23 Ill. Adm. Code 1400) and as certified public accountants individuals who have had at least one year of full-time experience, or its equivalent, providing any type of service or advice involving the use of accounting, attest, management advisory, financial advisory, tax or consulting skills that may be gained through employment in government, industry, academia, or public practice. Applicants may only receive experience after completing the education requirements for licensure as determined by the Board (see 23 Ill. Adm. Code 1400.90).
Suggested Revision

The Department of Financial and Professional Regulation—Division of Professional Regulation (Division) may license individuals who have received CPA certificates issued by the Board (see 23 Ill. Adm. Code 1400) and as certified public accountants individuals who have had at least one year of full-time experience, or its equivalent, providing any type of service or advice involving the use of accounting, attest, management advisory, financial advisory, tax or consulting skills that may be gained through employment in government, industry, academia, or public practice. Applicants may only receive experience after completing the education requirements for licensure as determined by the Board (see 23 Ill. Adm. Code 1400.90). 120 hours of undergraduate education and having obtained an undergraduate degree.

Rationale

The completion of 120 hours of education with a bachelor’s degree and employment in a full-time position recognizes individual circumstances. Some states allow candidates to take the CPA exam with 120 hours. Those candidates having completed the exam are recruited by Illinois firms to relocate and begin working a full-time job. Since they are working in a full-time position, the experience obtained should begin tolling to satisfy the experience requirement.

Section 1420.70 Continuing Professional Education

Published Version

c) Licensees with an address of record outside of Illinois who are actively licensed as a CPA by the state in their address of record shall be considered compliant with the CPE requirements of this Section 1420.70 if the licensee has complied with the CPE renewal requirement of the state in their address of record, so long as the licensee has completed 120 hours of CPE during the Illinois renewal cycle.

Suggested Revision

Licensees with an address of record outside of Illinois who are actively licensed as a CPA by the state in their address of record shall be considered compliant with the CPE requirements of this Section 1420.70 if the licensee has complied with the CPE renewal requirement of the state in their address of record, so long as the licensee has completed 120 hours of CPE during the Illinois renewal cycle.

Rationale
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The Illinois CPA Society recommends the removal of the language above referencing the 120 hours and the Illinois renewal cycle. This language is overly restrictive and places additional regulatory compliance burdens on licensees who maintain multiple licenses in various states. The CPA profession centers around mobility and CPE Mobility concept should be adopted here with recognition of satisfying CPE requirements of the licensee’s home state. This recommendation does not undermine compliance as the licensee will have to certify that they have completed CPE requirements, and IDFPR still has the authority to audit a licensee in this area.

We would appreciate your favorable consideration to the identified revision above and would welcome the opportunity to provide you with additional information if needed. Thank you for the opportunity to comment on the proposed changes and for the department’s extensive work and collaboration on these updates.

Sincerely,

[Signature]

ILLINOIS CPA SOCIETY

Martin Green, Esq.  
Vice President, Government Relations

The Illinois CPA Society (ICPAS), founded in 1903, is the fifth largest state CPA society in the nation, with more than 25,000 members. It is the premier professional organization that represents CPAs in Illinois. During its over 100 years of existence, the society has advanced the highest ethical and financial standards of the profession and has been a leader in educating the public on financial issues.