

Retired Exposure Draft Comments: Summaries

Alan Fletcher, CPA: Recommends eliminating the hyphen so the designation reads: “Retired CPA.” Alternatively, revise it to read: “CPA (Retired).”

Barbara, L. Franko, CPA: Does not support the proposal.

Barry Berlin, CPA: Does not support the designation. It is important not to limit an individual’s ability to describe their prior professional status or to limit an individual from performing any service, paid or otherwise, that could be performed by a non-CPA. Anyone who has been a CPA in good standing should be able to refer to themselves as inactive or retired. Every inactive or retired CPA should be able to perform any service that could be performed by a non-CPA. Rather than listing services that can be performed by an inactive or retired CPA, the Acts should list those services that cannot be performed. The current proposal goes beyond what is needed to accomplish its intended purpose of protecting the public. It infringes on the rights of former CPAs to advise other people of their prior status and of their rights to perform any service which does not require an active CPA license.

Bernard: A CPA still needs to keep up with tax law without the need to audit and compile financial statements.

Bob Miller, CPA: Thinks CPA Emeritus sounds better than CPA-Retired.

Bob Skees, CPA: Supports the proposal.

Brian H. Moore, Retired CPA: Would like to use the Retired CPA designation as he is currently on two 501(c)(3) boards.

Calvin D. Meeusen, CPA: Supports the proposal.

Carol Halter, CPA at Mostert, Manzanero & Scott LLP: Thinks this is a great idea. As she reaches retirement age, she would like to be able to use her hard-earned CPA title and understand what its limits are.

Carolyn Summerford, CPA: She is past retirement age, but still works and gets CPE credits. She would like to contribute her skills after retirement when needed. She suggested the title of “CPA-Emeritus.”

Chris Doherty, Executive Vice President of Fiscal Operations: Supports the proposal. He thinks dues should be scaled accordingly to the recognition that retired CPAs are not permitted to perform CPA services with compensation.

David Warlick, Retired CPA (still on active status): Supports the concept but believes retired CPA should be able to charge a nominal fee as there is an IRS requirement that the accountant be “paid” to do what he is doing for the nonprofit. The proposal should also require all state Boards of Accountancy to accept as a Retired CPA any member who is a Retired CPA in another state.

Debbie Jackson, CPA, CFE, Finance Director for Community Services Consortium: Believes this status would be a benefit to social services and would encourage volunteerism.

Dennis Vikartosky, CPA: Supports the new designation. He thinks the term “Inactive” carries a negative connotation and that “Retired” is a solution to that issue.

Diana W. Gwaltney, CPA, Senior Associate at Johnson Price Sprinkle: A minimum CPE requirement would add legitimacy to the designation.

Donald M. Kreal, CPA: Is in favor of the new status.

Donna Paris, Retired CPA: Does not support the proposal.

Frances Finkelstein, Retired CPA: Likes the idea but recommends some level of ongoing CPEs to stay on top of changes and improvements in the field.

Gary Konecy, CPA, ABF Consulting, Inc.: Supports the proposal.

Gordon Afdahl: Does not seem to be a business purpose in this designation. If a retired CPA meets annual IRS requirements, it would seem appropriate for that individual to continue to offer those tax services which he feels ethically competent to do so.

Greg Wiebe, CPA: Does not support the proposal. He disagrees with any provision that allows individuals to claim professional status if they have not maintained their professional education. The public does not understand the difference between active and retired. The profession is complex and CPE improves skills and maintains the profession's reputation.

Gwen Warren: Retired and Inactive CPAs should be allowed to receive compensation for certain services.

J. Russ Davison, CPA: Retirement age for CPAs should be 52 instead of 55 since CPAs enter the profession at 21 or 22 and then work 30 years to retire at age 52.

Jeff Picker, Retired CPA: Supports the proposal as he has struggled with how to describe himself since he started working full time. Questioned how "if competent" will be determined and thinks the decision on competency should rest on the person in question as there is not an easy, inexpensive, objective method to determine competency.

Jerry Bowin, McSoley McCoy & Co, AICPA Council Member: Proposal should also include volunteer service to governmental agencies/commissions/towns.

Joe Heinrich, Retired CPA: Provides finance and tax related consulting services to small business owners. Being able to use the Retired designation would enhance small business owners' comfort level in providing his services.

John M. Kriak, CPA: Supports the proposal, but thinks it should be CPA – Honorary member or CPA – Emeritus. If the "Retired" designation is used, it should be placed after CPA (CPA-Retired).

Jon Thompson, Retired CPA: Currently volunteers on several non-profit boards. Has maintained his active status but thinks this would be a better approach.

Jospeh Marinello, CPA: Thinks the proposal is a good idea but does not think the designation should preclude a Retired CPA from preparing tax returns for compensation.

Keith M. Wilson, Logistics Regional Controller of The Kroger Co., CPA: Thinks this proposal is worthwhile as he is approaching retirement age and would like to have a status that allows him to state that he is a CPA and perform some work for non-profits.

Kevin J. Mangan, CPA: Likes the idea but would like to know if retired CPAs could maintain their membership in the AICPA and receive the same benefits as active CPAs.

Larry Bailey, Retired CPA: Supports the proposal. He does not maintain his license to practice and so cannot serve as Treasurer for his church as he cannot prepare and present financial statements or information. The new designation would allow Retired CPAs to volunteer their services to organizations.

Louis Formica, Retired CPA: Is in support of the proposal.

Lynne Broza, CPA: Is retired but is maintaining her CPE requirements so as not lose the CPA designation.

M.A. Libien, Retired CPA: The proposal might incentivize people who should be paying a fee to a CPA to not pay a fee and use a Retired CPA.

Mathew Peterson, CPA/ABC, CVA at Petersen Advisors: Thinks the language “if competent” is offensive as there can incompetent CPAs at any age.

Michael Cash, EA: Volunteers as a quality reviewer for the AARP Tax Aide Program. Retired CPAs should be required to show that they had training for the current year updates but should not be required to sit through basic tax return preparation classes. A Retired CPA that wanted to serve on a non-profit board should not be treated differently than anyone else unless they were being asked to sign off on financial statements.

Mike E. Meegan, Retired CPA: Supports the proposal but thinks there needs to be some clarification on unpaid and volunteer work.

Montana Society of Certified Public Accountants: Expressed support for the idea and felt it is needed given how many CPAs are reaching retirement age. The Society feels that experience is as important as age and recommends that the language reflect in the rules that CPAs should be at least 55 years of age and have held a CPA license in good standing for at least 20 years with at least five of those years in active status.

Nick Gales, Retired CPA: A private citizen could perform these duties and wants to know why someone would have to be a Retired CPA.

Nick Mastracchio, Professor at University of South Florida and Retired Managing Partner of a CPA firm: He keeps his New York and Florida license current. Since his activities no longer require a license or involve the general public, he wants to know why this new category would not also include sharing over 50 years of experience when being compensated to do so.

North Carolina Board of Certified Public Accountant Examiners: Currently has definitions for “active” and “inactive” and removed the definition for “retired” in 2014. The Board has not had time to discuss the proposal with its stakeholders and will do so later this year.

Paul Cobb, Retired CPA: Currently maintains his CPA status so that he can serve on non-profit boards and assist in the VITA program. He thinks the proposal is a good idea.

Paul Steele, Elected County Commissioner: Supports the proposal and thinks that retired CPAs should be able to disclose their prior service in campaign literature when running for office.

Rachel O. Thomas, Retired CPA: Supports the proposal. There is a lot of uncertainty as to what she can or cannot do as a retired CPA .

Robert Callahan, Inactive CPA, PFS, CFP, President of Callahan Financial Planning Corporation: Favors the Retired designation. He would like to be able to do volunteer and philanthropic work during his retirement. Prefers the Retired designation over an Inactive designation.

Robert L. Neeley, Inactive CPA: Appreciates that this problem is being addressed.

Rubin Brown, LLP: Strongly supports the new designation. It encourages societal contributions and helps promote the CPA brand. The firm would encourage a minimum CPE requirement.

Sally Vansant Colkett, CPA, Engagement Manager for Experis Finance: Supports the proposal, however, she would like to see the requirement for CPAs who have more than 10 years experience as a CPA to be lowered to 20 hours of CPE per year.

Steve Sherrill: Supports the amendment but thinks retired CPAs should be allowed to prepare and sign tax returns.

Tom Buresh, CPA, CFP, PFS, Vice President of SVA: Supports the proposal. He is nearing retirement age and sits on three volunteer non-profit boards. This proposal would allow him to fulfil the board obligations without change and without hardship for the non-profits.

Warren Miller, CFA, ASA, CPA for Beckmill Research, LLC: Suggested some level of annual CPE that is directly related to the kind of tax returns that a retired CPA would be preparing.

William F. Casey, Jr., CPA: Supports the designation. He is currently retired and has continued to maintain his licenses. He would enjoy some relief from CPE requirements. He would like retired CPAs to be able to offer financial literacy seminars.

NASBA January 2016 Focus Question Responses

1. Has your Board considered the proposed changes to the Uniform Accountancy Act and Model Rules to create a "CPA-Retired" category? Do you foresee many retirees applying for this designation in your jurisdiction?

Alaska – Alaska currently has an "inactive" status and was waiting for a final outcome of the UAA regarding retired and/or inactive. Once the UAA is updated regarding "retired" status, the Board will review Alaska statutes/regulations and determine if changes are needed.

Arkansas – Our Board created a CPA Retired status via rule change in 2013. So far this has worked well and has been well received by licensees who qualify for this status.

Arizona – The Arizona Board of Accountancy established a retirement status with a change in statute in 2013. During calendar year 2015, the Board approved 337 registrants. While we do not calculate the total number of renewals for the whole calendar year, given our monthly average annualized, this would represent about 6% of our population.

California – Effective July 1, 2014, California licensees who meet the specific requirements may apply to have their license placed in a retired status with the California Board of Accountancy (CBA). Since this license status became available, the CBA has placed over 750 licensees in a retired status. The CBA will be discussing the Uniform Accountancy Act and Model Rules Exposure Draft at the January 21-22, 2016 CBA meeting.

CNMI – We have not yet considered this. We do not anticipate more than a handful of retirees applying for such status.

Colorado – No because Colorado already has a Retired status available for its CPAs. There are currently 491 Colorado CPAs with Retired licenses. We could see a potential concern regarding the type of services that are allowed when a CPA is in that status.

Connecticut – Not at this time.

Guam – Yes, Guam has had a Retired status since 2006, yet has very few retirees to date.

Idaho – Idaho currently has a “CPA-Retired” status for those licensees over 55 years of age. We currently have 109 licensees who have this status. We are, however, as a Board, looking over the UAA proposal and will be discussing to work towards more uniformity.

Illinois BOE – Should be considered by Illinois Department of Financial & Professional Regulation.

Illinois DFPR and PARC – Currently, the Illinois Public Accountancy Act permits any licensed or registered CPA with an active unencumbered license or registration, who notifies the Department, to elect to place his or her license or registration on an inactive status. 25 ILCS 450/17.2. At this time, the Illinois Department of Financial and Professional Regulation (“Department”) and the Public Accountant Registration and Licensure Committee (“PARC”) do not have the statutory authority to create a new license status.

Indiana – Indiana has addressed the “Retired” status in a prior year, as we offer our licensees this status. This status allows a licensee to renew without requiring the education that an active CPA would need to complete. The only restriction on this level of category is the licensee must duly note the “Retired CPA” if using the designation. The legislation was originally designed to have a reduced renewal fee, however this element slipped through at the normal renewal rate of an inactive CPA. Licensees may select “Retired” status on their renewal application. As of this date, ninety-seven (97) licensees have “Retired” status.

Iowa – From IAC 193A

5.9(8) Retired Status. A person holding an active license who does not reasonably expect to return to the workforce in any capacity for which an active certificate or license is required due to bona fide retirement or disability may use the title “CPA, retired” or “LPA, retired,” as applicable, in the context of non-income-producing personal activities. [ARC 7715B, IAB 4/22/09, effective 7/1/09] We currently do not offer a “retired” renewal status.

Kansas – No.

Louisiana – Yes, the Board is proposing a change to our Accountancy Act to allow a CPA-Retired status. Based on the proposed criteria (20 years consecutive Active status + age 55), perhaps 15% of our current

CPA-Inactive status registrants will move to CPA-Retired. Meeting the threshold of “consecutive” will be harder, but not impossible, for registrants that have moved into industry.

Maine – We have discussed the issue informally, as the state society has raised the issue. At this point, we are contemplating recommending legislative action to clarify that the prohibition against unlicensed individuals referring to themselves as CPAs does not apply to retired former licensees referring to themselves as “retired CPAs.”

Michigan – Not at this time. Michigan already has the designation of “Registered” status which enables one to still hold oneself out as a CPA but does not permit one to practice as a CPA.

Minnesota – We have not considered the “CPA-Retired” category. Applicants for designation: unknown.

Mississippi – Board Rules already grant CPA-Retired status to individuals who hold a current license issued by the Board who are 55 years old or older and have timely filed a request for Retired status on a form prescribed by the Board which indicates the licensee does not perform or offer to perform for the public one or more kinds of services involving the use of accounting or auditing skills, including the issuance of reports on financial statements or other compilation communication, or of one or more kinds of management advisory, financial advisory or consulting services, or the preparation of tax returns or the furnishing of advice on tax matters. There are currently 393 persons holding the CPA-Retired status in Mississippi.

Missouri – Only to the extent of a discussion item on the December 2015 Board meeting agenda.

Montana – We already have a CPA Retired status. We do have CPAs request this status. We are following the exposure draft and possible UAA amendments.

Nebraska – The Board has allowed those 60 years of age to retire and utilize the term “CPA-Inactive Retired” along without paying fees to the Board for many years. However, we do not limit the types of activities they can perform except for those that require an active license to perform which is the same way we treat our CPA-Inactive status as well. We do not foresee us changing our current practice.

Nevada – The Nevada Board currently has a CPA-Retired status. The requirements to qualify for retired status include removal from all financial functions of business. The regulations provide additional language that outlines the requirements for retired status. The Board will look at possible language amendments for renewal or continued oversight of retired licensees.

New Hampshire – The Board is interested in pursuing legislation in the 2017 legislative session that will create a CPA retired category.

New Jersey – In New Jersey, we have an “inactive-status” that many retirees take advantage of. At this time we do not have a formal “CPA-Retired” status. Should the current proposal lead to the establishment of such a status, New Jersey would certainly consider adding it.

New York – The New York State Board briefly discussed the CPA-Retired status at its November 2015 Board meeting. It was noted that this status is not available for any of the Department’s 53 professions.

Additionally, the proposed modifications would contradict New York's scope and it was suggested that this proposal would not be feasible in New York.

North Carolina – The Board and executive staff annually review its rules including exposure drafts. The UAA Exposure Draft from the AICPA and NASBA on “CPA-Retired” will be part of our review in 2016.

North Dakota – Our regulations have a Retired status. During our last meeting, we clarified that “not employed” refers to paid employment, not volunteer work, and that “may not practice” refers to work involving A&A skills as the law defines public practice.

Ohio – Ohio currently has a rule in place – 4701-7-06(C) - <http://codes.ohio.gov/oac/4701-7-06>.

Oklahoma – The Oklahoma Board has not considered changes to our Act or rules at this time. Oklahoma's existing rules mirror the UAA proposed language.

Oregon – Yes. Oregon has had this status for some time, and is currently in the process of updating rules for it. Oregon respectfully disagrees with the UAA exposure draft as the Oregon Board believes the proposal is too restrictive as drafted. For example, excluding any type of compensated work – including work not subject to any CPA professional standards – appears excessive to us and would have the effect of disallowing retired CPAs from serving on boards of public or non-profit institutions.

Pennsylvania – Pennsylvania currently has only active and inactive status. The Board has held discussions regarding a potential CPA-Retired status and the Board felt it would only add more confusion to the current Regulations and to public at large. Thus we are not in favor of this proposal.

South Dakota – The South Dakota Board of Accountancy has a CPA, Retired. In accordance with our current statute, the South Dakota Board of Accountancy would not be in compliance with the proposed exposure draft and it would require a statute change. That change would be addressed and discussed if there are changes made to the UAA in regards to this designation.

Texas – The enabling legislation in Texas has identified a retired status since 1981. The current Board Rule stipulates a retirement age of 60 and no association with accounting work. A licensee may participate in a board or governance position for a charity or civic organization without compensation and be eligible for the retired status. At the end of the last fiscal year, there were about 7,400 Texas CPAs with a retired designation or about 10% of our total licensed population. This figure was more than doubled in the last 6 years.

Vermont – Due to the Umbrella Agency model in Vermont and current fee structure we do not plan to move forward with a CPA-Retired category. This model is not used for any other license in Vermont and is not contemplated in the Vermont fee structure. As such, this change would take significant legislative involvement. Our rules currently allow expired licensees to utilize the title CPA Retired without registering with the Board as long as they are retired and not practicing.

Virginia – The Virginia Board of Accountancy plans to respond to the exposure draft by the deadline of February 2, 2016. At this time, we do not have a “retired” status in Virginia. The Board implemented an “Active – CPE Exempt” status on July 2, 2015.

The “Active – CPE Exempt” status is defined as an individual that is currently and actively licensed as a CPA in Virginia and may use the CPA title. However, the individual is not currently providing services to the public (providing services that are subject to the guidance of the standard-setting authorities listed in the standards of conduct and practice in subdivisions 5 and 6 of § 54.1-4413.3) or to an employer (providing to an entity services that require the substantial use of accounting, financial, tax or other skills that are relevant, as determined by the Board) and therefore is not required to meet the Board’s CPE requirements.

In order to qualify for the Active-CPE Exempt status the individual’s current job duties may not require a substantial use of accounting, financial, tax or other skills that are relevant, as determined by the Board (generally < 5%).

To apply for the status, a Virginia CPA must complete a form found on the Virginia Board of Accountancy website and attach a current job description.

To date, approximately 1,500 Virginia CPAs have applied for the status, with 1,000 approved.

Washington – Yes and Yes. The Washington Board does have a permitted designation, CPA-Retired by Rule (this is NOT a license status). We have a number of individuals who have applied and qualified for the designation. See WAC 4-30-058 at cpaboard.wa.gov/resources.

West Virginia – The Board reviewed the UAA CPA-Retired category information released by the AICPA at the last Board Meeting. However, no action was taken at that time.

Wyoming – Wyoming statutes and rules and regulations have authorized the Board to grant a retired status to active or inactive certificate holders since at least 2005. Currently the Board’s rules and regulations require that “retired status” holders not perform any accounting services as defined in the Board’s practice act and rules and regulations. The Board is giving consideration to allowing retired status holders to perform limited accounting services for non-profit organizations.

Julia Morriss

From: Alan Fletcher <aletcher.tfc@gmail.com>
Sent: Tuesday, January 26, 2016 5:00 PM
To: Retired Exposure Draft; lhaberman@nasba.org
Subject: Comment on Proposal for status as Retired CPA

Mat Young, Vice President – State Regulatory & Legislative Affairs – RetiredExposureDraft@aicpa.org
Louise Dratler Haberman, Vice President, Information & Research – lhaberman@nasba.org

My only comment on the proposal to establish a new designation for retired CPAs is the proposed designation itself, "Retired-CPA." If this designation is adopted, I recommend elimination of the hyphen, so the designation reads: "Retired CPA." Alternatively, and my strong preference and recommendation, is that the designation be revised to read: "CPA (Retired)."

Respectfully,

Alan F. Fletcher, CPA
513 Knollwood Drive SE
Cedar Rapids, IA 52403
aletcher.tfc@gmail.com

Julia Morriss

From: Barb Franko <barbfrankocpa@gmail.com>
Sent: Friday, January 08, 2016 11:56 AM
To: Retired Exposure Draft
Subject: Retired Exposure Draft

I would like to voice my opinion that a retired CPA should be allowed to sign as a CPA. I support the rules as they are – and do not support the amendment.

Barbara L. Franko, CPA

Phone: [434-533-5477](tel:434-533-5477)

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TO: Mat Young, Vice President – State Regulatory & Legislative Affairs
Louise Dratler Haberman, Vice President, Information & Research

FM: Barry Berlin, CPA

RE: Proposed Revisions to AICPA/NASBA Uniform Accountancy Act and NASBA
Uniform Accountancy Act rules section 6(d) and rule 6-7 November 2015

December 3, 2015

I am writing to express my disapproval of the Proposed Revisions. While I understand the need to protect the public, it is equally important, if not more so, not to limit an individual's ability to describe their prior professional status or to limit an individual from performing any service, paid or otherwise, that could be performed by a nonCPA. My comments are as follows:

1. Anyone who has been a CPA in good standing and has not had their license revoked should be able to refer to themselves as an "inactive" or "retired" CPA.
2. Every inactive or retired CPA should be able to perform any service, either for compensation or as a volunteer, which could be performed by a nonCPA. For example, if an inactive or retired CPA wanted to provide bookkeeping services for compensation, there should not be an attempt to limit their ability to do so.
3. Rather than listing services that can be performed by an inactive or retired CPA, **the Acts should list those services that cannot be performed**; i.e., only those services for which a valid CPA license is required (e.g., giving an opinion on audited financial statements).
4. To protect the public, any active CPA seeking the status of inactive or retired CPA could be asked to provide to their state board of accountancy a commitment in writing that they will not perform any services that require a valid CPA license. Anyone not willing to make such a commitment could have their license revoked, and as part of this process restricted from making any reference to having been a CPA.
5. The public is well advised that a CPA using the inactive or retired designation no longer has the professional qualifications to perform services that require a valid CPA license. For example, the public would not expect to receive legal representation from a retired lawyer or go for surgery to a retired physician.
6. The ability to inform another person that in the past you held a valid CPA license but are now retired should not (I would say, cannot) be restricted as it is merely relating to the other person an aspect of your past.
7. The current proposal goes beyond what is needed to accomplish its intended purpose of protecting the public. Rather, it infringes on the rights of former CPAs to advise other people of their prior status and of their rights to perform any service which does not require an active CPA license.

Thank you for your consideration of my comments.

Julia Morriss

From: Bernard <berniesa@pacifier.com>
Sent: Thursday, November 05, 2015 11:46 AM
To: Retired Exposure Draft
Subject: retires cpa and tax prep

What restrictions and proposed changes addressed limited tax practice? I know that a limited number of friends and family do not desire to change tax preparer. A Cpa still need to keep up with tax law without the need to audit and compile financial statements.

Julia Morriss

From: Bob Miller <slademiller@msn.com>
Sent: Saturday, January 09, 2016 11:38 AM
To: Retired Exposure Draft
Subject: Retired CPA Status Exposure Draft

CPA Emeritus sound a lot better than CPA-Retired. NACVA has adopted this title for retired CVA members. They allow a CVA-Emeritus to prepare 5-6 valuations per year if they don't advertise and take a day-long update seminar every three years.

Bob Miller, CPA

Julia Morriss

From: Bob Skees <rdskees@gmail.com>
Sent: Saturday, November 07, 2015 11:24 AM
To: Retired Exposure Draft
Cc: cemery@nccpaboard.gov; David Thomas
Subject: Retired-CPA Designation

As a CPA for 51 years, I am now nearing retirement. My state of licensure (NC) would not allow me to refer to myself in any way as a CPA once I retired. I welcome this chance to continue to be a proud member of our profession.

Robert D. Skees, CPA
NC Certificate 2743

Julia Morriss

From: B M <bhmz3@ymail.com>
Sent: Wednesday, November 04, 2015 2:58 PM
To: Retired Exposure Draft
Subject: In favor of proposal

From

MOORE, BRIAN H.	INDIVIDUAL	MANSFIELD	OH	CPA.05983	RETIRED
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1147 State Route 97,
Lexington, OH 44904
419.884.1702
217.855.3546

Yes would like to use Retired-CPA designation with registration. Many times I refer to myself as former CPA in order to distinguish that I am no longer licensed to practice. I am on 2 501(c)(3) boards.

I would also like to propose that something be done about a free lifetime AICPA membership for retirees like myself who retired at age 62 after a 41 year career with 36 years as a CPA.

Very truly yours,
Brian H. Moore

Julia Morriss

From: Calvin Meeusen <cmeeusencpa@cpa.com>
Sent: Thursday, December 31, 2015 10:59 AM
To: Retired Exposure Draft
Subject: retired CPA's

This is an excellent idea, why would someone who has worked as a CPA for many years and then wishes to retire and was proud of being a CPA have to give it when they retire; I have been a CPA since 1971. In my opinion the general still holds CPA'S in high regard no matter if you are retired or not; certainly much higher than attorneys and other professionals. An excellent idea.

Thank You,

Calvin D Meeusen, CPA

Julia Morriss

From: Carol Halter <chalter@mmscpas.com>
Sent: Wednesday, November 04, 2015 12:16 PM
To: Retired Exposure Draft
Subject: Good idea!

I think it is a great idea that should be looked at. As I reach retirement age and continue to work, I can't help but think that I would like to be able to use my "hard-earned" title as a CPA after I retire and understand what the limitations are if I do so.

Carol

Carol L Halter, CPA
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Julia Morriss

From: ccscpa <ccscpa@scottsboro.org>
Sent: Wednesday, November 04, 2015 12:20 PM
To: Retired Exposure Draft
Subject: Carolyn Summerford, CPA

I am a CPA past retirement age but still working and getting the required CPE credits. My retirement is in the near future but my desire is to contribute my skills after retirement where needed; therefore, I am interested in learning more about the uniform retired CPA status. I would like, at this time, to contribute a suggested title for the retired CPA: "CPA-EMERITUS".

Carolyn Summerford, CPA

CCSCPA@SCOTTSBORO.ORG

Julia Morriss

From: Doherty, Chris <chris.doherty@farmcreditwest.com>
Sent: Tuesday, January 12, 2016 11:42 AM
To: Retired Exposure Draft
Subject: Retired-CPA proposal comments

I want to express my support for the proposal as drafted to create a uniform and recognized status for retired CPAs that would enable them to convert to active status if and when circumstances warrant.

One would hope that dues, if any, would be scaled accordingly to the recognition that retired CPA is not permitted to perform CPA services with compensation.

Thank you for moving this enhancement forward.

Christopher Doherty

Executive Vice President – Fiscal Operations
Farm Credit West
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AICPA acct number - 4653

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Julia Morriss

From: David Warlick <warlick@live.com>
Sent: Thursday, November 05, 2015 10:21 AM
To: Retired Exposure Draft
Subject: Conflict in Retired activities

While I support the concept of a retired CPA without specific CPE requirements, the draft guidelines might be impossible for a CPA to follow. If a CPA serves on a nonprofit board, as I do at age 68, he or she is typically asked to prepare the Form 990. This is because paid Auditors ask about \$1000 to prepare the Form 990, they generally refuse to file it timely and instead seek an extension, and they generally refuse to write language in Part III (programs) or Schedule O (governance). A nonprofit is unlikely to win any grants if it cannot file timely, cannot boast about its programs in Part III, and cannot describe its good governance in Schedule O. So the CPA Board member writes the quality and timely Form 990. To efile the Form 990 at a site such as Form990online.org, the retired CPA has to say he/she is a paid preparer. I charge a nonprofit \$5 to do their Form 990, which is less than the Form990online filing fee so I make a loss, but still I have a \$5 check to prove that I was a paid preparer.

The Exposure Draft has to allow for nominal income by the retired CPA. The definition of nominal income should be broad enough to allow the CPA to charge something like \$5 when there is an IRS requirement that the accountant be "paid" to do what he/she is doing for the nonprofit.

Another thing the ED has to do is make it easy for a Retired CPA to change states. As it is, current rules make it almost impossible to be a CPA in another state, such as passing the CPA test in Virginia on the first try, working in Virginia, retiring to Georgia, taking gobs of CPE as a "pilot tester" for Thomson Reuters, and trying to transfer registration from the VA BoA to the GA BoA. It can't be done. I would very much like to participate in Georgia CPA activities, and share my knowledge of nonprofits and charter-school accounting, but some states simply don't want transferees. This is bad for the profession to exclude older members from sharing knowledge in their new retiree state. The Exposure Draft should force all state BoA to accept as a Retiree CPA any member who is either active Board certified or a Retiree CPA in another state, and this should be done with minimum paperwork and fees, such as the one-minute free online "paperwork" required to file the IRS' Form 990-N notecard.

David C. Warlick
Retired, still on active status in Virginia, still taking gobs of CPE but not always the annual state ethics, living in Georgia

Sent from [Mail](#) for Windows 10

Julia Morriss

From: Debbie Jackson <djackson@communityservices.us>
Sent: Wednesday, November 04, 2015 5:48 PM
To: Retired Exposure Draft
Subject: Volunteer participation for non-profits would be a huge benefit to social services

As a current CPA, and CFO for a quasi-governmental social service organization, this proposed Retired CPA status would be a huge benefit to social services, and bring another level of expertise to the area.

It would encourage volunteerism for such programs as AARP's Volunteer Income Tax Assistance, get more skilled levels in non-profit leadership roles, and areas like elder financial abuse that interest me in retirement.

DJ

Debbie Jackson, CPA, CFE
Finance Director

Community Services Consortium, A Community Action Agency, serving low income families in Linn Benton and Lincoln counties in Oregon

541-704-7623
djackson@communityservices.us

Julia Morriss

From: Dennis Vikartosky <dvik41040@hotmail.com>
Sent: Wednesday, January 13, 2016 7:20 PM
To: Retired Exposure Draft
Subject: Comment on Retired-CPA Status

As a CPA who will be retiring soon, I wholeheartedly support the new status for retired CPAs. It's about time! I believe the term "Inactive-CPA" carries a somewhat negative connotation that such a CPA is unable to serve any entity in any manner whatsoever. The "Retired-CPA" status is a solution to that issue. Thank you.

Dennis J. Vikartosky CPA

Julia Morriss

From: Diana W. Gwaltney <dianag@jpspa.com>
Sent: Monday, November 09, 2015 9:24 AM
To: Retired Exposure Draft
Subject: Comment

I think some kind of minimum CPE requirement would add legitimacy to the designation. If you were going to do volunteer tax prep, maybe 8 hrs of tax cpe? Something of that nature....

Diana Gwaltney

CPA
Senior Associate

[vCard](#) | [Send Me a File](#)

828.225.3705 direct
828.254.2374 main
dianag@jpspa.com

79 Woodfin Place, Suite 300 · Asheville, NC 28801 · Fax 828.252.9994 · www.jpspa.com



Johnson Price Sprinkle PA

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Julia Morriss

From: D Kreal <dordkreal@verizon.net>
Sent: Tuesday, November 24, 2015 1:44 PM
To: Retired Exposure Draft
Subject: Retired CPAs

As a soon to be retired CPA, i am in favor of creating a new status for retired CPAs.. I will be asked to volunteer my services during tax season in my community.I will be asked to serve on the board of a non-profit organization.

I strongly recommedn that this proposal be adopted.

Donald M. Kreal, CPA

Marlton, NJ
856-988-0271

Julia Morriss

From: Donna Paris <dfp7@charter.net>
Sent: Monday, November 09, 2015 3:03 PM
To: Retired Exposure Draft
Subject: Retired CPA Status

GIVE ME A BREAK with your rules and designations. ALL "Retired" CPAs are CPAs and don't need to be distinguished further. None of us, or our former firms, want to hold us out as practicing CPAs and we don't need you to tell us what we can or can't do or volunteer to do in retirement. GIVE IT UP!!

Julia Morriss

From: Frances Finkelstein <franfinkelstein@gmail.com>
Sent: Wednesday, November 04, 2015 10:11 AM
To: Retired Exposure Draft
Subject: Feedback on this proposal

I am a retired CPA but maintain my license by taking the necessary NJ CPEs. The idea of this new status is commendable but I recommend some level of ongoing CPES to stay on top of changes and improvements in the field.

Frances Finkelstein

ABF CONSULTING, INC.
ABF CONSULTING SERVICES, LLC.

James T. Thaller (founder, deceased 2014)

Gary Konecky, CPA
John R. Mariano

33 Newark Pompton Tpke, Riverdale, NJ 07457
PHONE: (973) 616-6602 FAX: (973) 616-6672
E-MAIL: info@ABFconsultinginc.com

November 9, 2015

Mat Young
RetiredExposureDraft@aicpa.org

Louise Dratler Haberman
lhaberman@nasba.org

Re: Exposure Draft – Proposed Revisions to AICPA/NASBA UAA

I am writing in favor of the idea of retired CPAs, who are serving in a volunteer capacity being designated as CPA (Retired). Acquiring the CPA designation is an accomplishment, and one should be acknowledged for that accomplishment, even if one is retired.

I am also writing about another issue. While I understand that the AICPA lost court cases in Florida and Texas about non-CPAs preparing financial statements, I resent that any bum off the street can allegedly do what I do as a practicing CPA. Furthermore, if I understand the AICPA Professional Standards correctly, the matter has gone beyond compilation of financial statements, as the AICPA Professional Standards appear to now say that any bozo can review financial statements. Review of financial statements is an attestation engagement. Attestation engagements (in the form of audits) are what CPAs were originally licensed for. It is imperative that the UAA make it clear that attestation engagements of any and all types require a CPA perform them.

If you have any questions, feel free to call.

Respectfully submitted,

Gary Konecky, CPA

Julia Morriss

From: glafdahl@frontier.com
Sent: Friday, January 08, 2016 1:54 PM
To: Retired Exposure Draft
Subject: Change in Retired CPA Status

Comments:

Do these changes accomplish anything worthwhile? Other than affixing it to a business card in which no services offered by CPAs can be done, there does not seem to be a business purpose in this designation.

If a retired CPA has met annual requirements of the IRS for preparing tax returns, it would seem appropriate for that individual to continue to offer those tax services which he or she feels ethically competent to do so, similar to an active CPA. Affixing "CPA" after signing the tax return would add credibility to the IRS reviewing such a return.

Gordon Afdahl

Julia Morriss

From: Greg Wiebe <gregw@wiebecpa.com>
Sent: Tuesday, December 29, 2015 4:54 PM
To: Retired Exposure Draft
Subject: Retired CPA status

NO,NO,NO. I am 62, almost 63 and I disagree with any provision which would allow any individual to claim any professional status if they have not maintained their professional education. The public will not and does not understand the difference between active, nonactive retired, limited to non-attest and any other variations which are sure to be suggested. It is not hard to keep your license active and your skills at least reasonably current. I commend anyone who wants to volunteer. But if you are going to "claim" some sort of expertise and it is that of a CPA, I say your license better be active. Our profession is complex. I see CPA'S who have a license perform substandard services. I have been a CPA for 40 years and am proud of it. I always complain about the time continuing education takes but I realize it improves my skills and ultimately helps maintain the reputation of my profession.

Therefore, I say no! I don't even like that licenses are issued to accountants who have not completed their experience requirements as we had to in 1975. If they claim to be a CPA, they should be able to read and sign a financial statement. If not, let them be an EA, ASA, etc.

Greg Wiebe, Calif CPA #24053e

Julia Morriss

From: Gwen Warren <gwenniebb78@gmail.com>
Sent: Monday, January 11, 2016 10:23 AM
To: Retired Exposure Draft
Subject: Retired/Inactive CPA status should be allowed to receive compensation for certain services

I believe if a CPA is performing any activity which another person could perform without a CPA designation, such as preparing a tax return or bookkeeping, then it is unfair and unjust to require the CPA be forced to remove their professional designation simply because they engage in such an activity for compensation.

It also places an undue financial hardship on those who have become disabled but still need to work. Disability carries with it a significant emotional loss as well as a physical one. The ability to continue to prepare tax returns or bookkeeping, while not at the amount or level you were once able to complete, still allows you to maintain your dignity and self-respect.

Of course, the CPA should remain competent in these areas and maintain a "to be determined" CPE requirement.

Gwen Warren
(615) 672-1316

Julia Morriss

From: Russ Davison <davison.russ@yahoo.com>
Sent: Tuesday, December 29, 2015 4:23 PM
To: Retired Exposure Draft
Subject: Retirement age

I would like to recommend the committee consider using a retirement age for inactive CPAs to be 52 rather than 55. Most CPAs would have entered our profession at either age 21 or 22 when they graduated from college. After working a 30-year career, this would put the theoretical retirement age at 52.

Thanks for your consideration.

J. Russell Davison, CPA

Julia Morriss

From: Jeff Picker <jpicker37@gmail.com>
Sent: Monday, December 28, 2015 10:17 AM
To: Retired Exposure Draft
Subject: New status for retired CPA's

As a recently (almost three years) retired CPA who spent 25 years as a partner in two international firms then 18 years as a CFO/Treasurer of a group of insurance companies I applaud the AICPA proposal to recognize a new status for retired CPA's. I have struggled with how to describe myself since I stopped working full time and no longer had the time and resources to participate in required continuing education and changed my license status to inactive. An official status of "Retired-CPA" is both timely and appropriate.

One issue to be considered further based on the short article in this months "Journal of Accountancy" is the use of the term "if competent". How will that be determined? In the eyes of the retired CPA, some test to be administered or an interview?. In my opinion, the decision on competency will need to rest in the person as I do not see an easy, inexpensive, objective method to create to determine competency.

I look forward to reading further about this new status

Thank you

Jeffrey Picker

Julia Morriss

From: Jerry Bowin <JBowin@CPAVT.COM>
Sent: Friday, January 08, 2016 2:27 PM
To: Retired Exposure Draft; lhaberman@nasba.org
Cc: jbowin@cpavt.com
Subject: Comment on UAA Revision Draft- Retired status

The UAA exposure draft specifically allows volunteer service to a "non-profit organization" by a retired member, but makes no reference to volunteer services to a governmental agency or commission.

I feel that volunteer service to governmental agencies/commissions/towns etc should also be allowed.

PS: I am on AICPA Council 2015-2018.

Jerry Bowin



McSoley McCoy & Co.
118 Tilley Drive, Suite 202
South Burlington, VT 05403
Ph: 802.658.1808
Fax: 802.658.1779
www.cpavt.com



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Julia Morriss

From: Joseph Heinrich <joseph.d.heinrich@gmail.com>
Sent: Friday, January 08, 2016 7:40 PM
To: Retired Exposure Draft
Subject: Retired-CPA Status

I am retired and a member of the AICPA. I spent 11.5 years with KPMG and 21 years with Coca-Cola Enterprises Inc. in accounting and finance related position. I have been retired for 5 years and am currently 60 years old. During the past five years I have provided about 300 hours annually of finance and tax related consulting services to small business owners through SCORE in Seattle.

Being able to use the "Retired-CPA" status openly with these small business owners would enhance their comfort level in the services I provide them and also enhance the image of SCORE locally and nationally.

I fully support the proposal of a "Retired-CPA" status.

Joe Heinrich

Julia Morriss

From: John Kriak <jkriak@groupsavvy.com>
Sent: Monday, December 28, 2015 7:27 AM
To: Retired Exposure Draft
Subject: Certification Comments

In the January issue of the Journal of Accountancy, the News Digest article on "Proposal would create new status for retired CPAs" applies to me.

On May 30, 2013 the AICPA congratulated me as an Honorary Member for my 40 consecutive years of membership. As of December 31, 2015 I have decided to not maintain the continuing education requirements. I respectfully submit that for members who have served all or most of their professional life as a CPA, the appropriate designation should be "CPA – Honorary Member" or "CPA – Emeritus". The AICPA can establish the appropriate age and years of service requirements following customary corporate and not-for-profit designations for their longtime and valued officers and board members.

If the retired designation is used, then place "CPA" first then the qualifier - "CPA – Retired"

Thank you for considering my suggestions.

Sincerely,

John M. Kriak, CPA

GroupGenesis, LLC
319 Washington Street Suite 202
Johnstown, PA 15901

 E-mail: JKriak@GroupSavvy.com

 Telephone: 814-536-9975

 Mobile: 814-242-8444

 Fax: 814-536-9976

SKYPE: john.kriak

Conferencing: 888-222-0475 with Access Code 6887843#

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Julia Morriss

From: Jon Thompson <RSGear@Charter.net>
Sent: Wednesday, November 04, 2015 10:31 AM
To: Retired Exposure Draft
Subject: FW: Rules for Retired CPAs

From: Jon Thompson [mailto:RSGear@Charter.net]
Sent: Wednesday, November 4, 2015 9:30 AM
To: 'RetiredExposureDraft@aicpa.org.' <RetiredExposureDraft@aicpa.org.>
Subject: Rules for Retired CPAs

I think this is a great idea. I am a retired CPA and I currently volunteer by serving on the board of several not-for-profit organizations. I have maintained active status so there are no misunderstandings but this would be a much better approach.

Jon Thompson, CPA

Julia Morriss

From: Joseph Marinello <JM@jmarinellocpa.com>
Sent: Thursday, November 05, 2015 10:02 AM
To: Retired Exposure Draft
Subject: Retired - CPA designation.

Dear Colleagues,

I am over 55 & thinking of retiring. I think that these changes are very good as a showing of gratitude to elder CPA's.

It, however, seems to me that any individual can be a paid preparer when he obtains a PTIN. This if I am reading it correctly precludes " Retired – CPA's and is hence discriminatory.

I would add that this designation would not preclude a "Retired – CPA from preparing tax returns for compensation.

Joseph Marinello CPA
228 Franklin Ave Suite 1
Nutley NJ 07110
Tel 973.661.0048 Fax 973.661.3504
Email: jm@jmarinellocpa.com

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Julia Morriss

From: Wilson, Keith M <keith.wilson@kroger.com>
Sent: Thursday, December 31, 2015 3:04 PM
To: Retired Exposure Draft
Subject: Comments on Retired CPA status

I wanted to pass along that I believe the proposed change to the bylaws establishing a "retired-CPA" status is a good idea. Our retired CPA's can still be good emissaries for the profession, and this is a very good way to keep the CPA title out with the public. I hope that you will make this proposal a permanent change to the bylaws.

Respectfully,

Keith M. Wilson, CPA
Logistics Regional Controller
The Kroger Co.
ph. 502-429-4831
fax 502-429-4899

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Julia Morriss

From: Wilson, Keith M <keith.wilson@kroger.com>
Sent: Wednesday, November 04, 2015 9:42 AM
To: Retired Exposure Draft
Subject: Comments on proposal for new status of retired CPA's

I would like to state that I think this proposal is very worthwhile. I am approaching retirement age and it would be nice to have a status that would allow me to state that I am a CPA and perform some work for non-profits or just volunteer our time to help others. I hope that you will work to make this a reality so we can keep our CPA title while performing some valuable (unpaid) work for these types of agencies.

Keith M. Wilson, CPA
Logistics Regional Controller
The Kroger Co.
ph. 502-429-4831
fax 502-429-4899

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Julia Morriss

From: Mangan, Kevin <Kevin.Mangan@HendrickAuto.com>
Sent: Wednesday, November 04, 2015 11:43 AM
To: Retired Exposure Draft
Subject: retired CAP status

I like the idea!!!

One item to consider – Could retired CPA's maintain their membership in the AICPA and receive the same benefits as they did as active CPA's?

Kevin J. Mangan, CPA

BREAKING NEWS

NEWS

Proposal would create new status for retired CPAs

By Ken Tysiac

November 3, 2015

Related

October 19, 2015

[CPA exam evolving to reflect shift in skills requirements](#)

October 19, 2014

[Council vote conforms resolution in AICPA code with revised UAA attest definition](#)

A new, uniform “Retired-CPA” status would be created under a proposal issued this week by the boards of directors of the AICPA and the National Association of State Boards of Accountancy (NASBA).

The [proposal](#) would revise the AICPA/NASBA Uniform Accountancy Act (UAA) and the NASBA UAA Rules to allow retired CPAs to continue to serve their communities without remaining active CPAs in practice.

The current UAA includes an “Inactive-CPA” status, which indicates that a CPA has not maintained the required amount of continuing professional education and cannot claim CPA status without current CPE.

State boards of accountancy have asked NASBA for guidance on how to recognize both inactive and retired CPAs, and without a uniform approach, a majority of states have adopted their own retired status in their statutes or rules. As a result, there is inconsistency in treatment of this class of CPAs.

The demand for a uniform status for retired CPAs has been heightened by the Baby Boomer generation’s arrival at retirement age.

The UAA Committee is recommending the creation of a uniform Retired-CPA status that would allow Retired-CPAs to offer a limited array of volunteer, uncompensated services to the public. The UAA Committee is recommending that inactive CPAs who are at least 55 years old be allowed to:

- Refer to themselves as “Retired-CPA” with appropriate registration with their state board.
- Offer volunteer tax preparation services if competent.
- Participate in government-sponsored business mentoring programs if competent.
- Serve on the board of a not-for-profit organization if competent.

All of these activities can currently be offered by non-CPAs. Retired-CPAs would be required to affirm to state boards of accountancy that they understand the limitations on what services they offer; agree not to use their retired status in a misleading way; and maintain professional competency, without a specific CPE requirement, when offering any of the permitted volunteer services.

Comments on the proposal are sought by Feb. 2 and can be submitted to RetiredExposureDraft@aicpa.org.

—**Ken Tysiac** (ktysiac@aicpa.org) is a JofA editorial director.

Julia Morriss

From: LARRY BAILEY <ldaytonb@sbcglobal.net>
Sent: Monday, January 11, 2016 10:51 AM
To: Retired Exposure Draft
Subject: Comments:

I am completely in agreement with the recommended changes. It is long overdue. I am 78 years old and have been retired for many years, and have not maintained my license to practice. I have maintained my State and National CPA memberships. I have served on my church board for many years, but have not been able to serve as Treasurer, even though I was the most qualified, because as I read the rules, I could not prepare and present financial statements or information. This is not fair to the many volunteer organizations that retired CPA's belong to. No doubt this waste of resources is echoed across the Country. I believe this proposal for CPA Retired designation and ability to volunteer their services would be a tremendous aid to organizations, Cities, etc. Please pass the recommendation as soon as possible.

Larry D. Bailey
AICPA NO. 0031306
OSCPA NO. 1950
OKLAHOMA STATE BOARD CERTIFICATE NO 2512

Julia Morriss

From: Louis Formica <ljf@btsbm.com>
Sent: Wednesday, November 04, 2015 10:07 AM
To: Retired Exposure Draft
Subject: 100% in support of this proposal.

Louis Formica, retired CPA working in industry for a few more years.

Julia Morriss

From: Lynne Broza <lynnebro@optonline.net>
Sent: Friday, January 08, 2016 1:17 PM
To: Retired Exposure Draft
Subject: Other AICPA designations

I am recently retired, but so far am maintaining my CPE requirements so as not to lose the CPA designation. I also have the ABV and CFF credentials and I am wondering how this exposure draft or even the old rules would affect those. I worked very hard and spent a lot of time and money for those credentials and would like to be able to put them on the "retired" or "inactive" status also, rather than lose them altogether. I am sure there are and will be many others with similar issues. Please advise. Thank you.

Lynne Broza
345 Woodmere Avenue
Neptune, NJ 07753
732-774-3040

Julia Morriss

From: MLibienCPA@aol.com
Sent: Thursday, November 05, 2015 2:13 PM
To: Retired Exposure Draft
Subject: RETIRED CPA STATUS

I AM A RETIRED CPA, WHO DOES ONLY MY TEMPLE'S BOOKS AND RECORDS. A LICENSED CPA DOES THE AUDIT AND GETS PAID.. MY TROUBLE WITH SUCH A (proposed) DESIGNATION - IS THAT DOES DOING FREE TAX RETURNS AND ACCOUNTING (REPORT) WORK TAKE WORK FROM THOSE, WHO MAY OR MAY NOT BE LICENSED? I DO-NOT PRETEND TO DO KNOW THE ANSWER - BUT SEMI-LICENSING THIS TYPE OF WORK IMPENGENS UPON A WORKING COMMUNITY **AND ENCOURAGES PEOPLE WHO SHOULD BE PAYING A FEE - NOT TO PAY A FEE. WHAT IS WRONG WITH THE PRESENT SYSTEM? WHY DO YOU NEED TO GET INVOLVED?**
M.A. Libien, NYS CPA License # 021525.

Julia Morriss

From: Matt Petersen <Matt@petersenadvisors.com>
Sent: Wednesday, November 04, 2015 11:41 AM
To: Retired Exposure Draft
Subject: comment

I think "if competent" is offensive. There incompetent CPAs at any age

Mathew Petersen, CPA/ABV, CVA

509.575.1040 office

[\(about\)](#)



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Julia Morriss

From: MichaelSCashEA@aol.com
Sent: Thursday, November 05, 2015 9:34 PM
To: Retired Exposure Draft
Subject: Retired CPAs

I serve as a volunteer quality reviewer for the AARP Tax Aide Program (a clone of IRS VITA.) Returns done by volunteers are limited in scope. We would welcome any retired CPA who wanted to be a volunteer. In my local group, there is an enrolled agent--me (besides quality review, I do any old year or out of state returns,) at least one person who is or was enrolled with the California Tax Education Council (a person who has passed the H&R Block 60 hour class or equivalent, a minimum requirement for paid preparers in California) a retired attorney and retired FBI agent.

The main thing that any volunteer needs it to get annual updates, something we offer in annual training. I would suggest that a retired CPA be required to show that they had training for the current year updates but not be required to sit through basic tax return preparation classes unless they wanted the social interaction.

As for serving on the board of a not-for-profit organization, a retired CPA should be treated on different than anybody else unless they were being asked to sign off on financial statements.

Michael S Cash, EA
426 14th St, Suite 111
Modesto, CA 95354
Phone (209) 575-1040
Mobile (209) 484-5789
Internet Fax (815) 301-3446

Julia Morriss

From: Mike Meegan <mike.meegan303@gmail.com>
Sent: Sunday, January 10, 2016 11:34 AM
To: Retired Exposure Draft
Subject: Retired ED

Ladies and Gentlemen,

I support this effort at clarity and uniformity. Seeing the questions asked at ethics seminars, etc. clarification is needed and will be helpful.

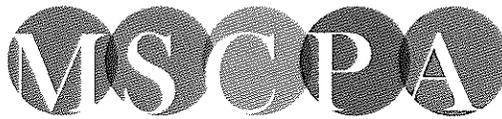
There are many opportunities for unpaid, volunteer work without one eye I various state requirements.

Sincerely,

Michael E Meegan

Retired (but not inactive)

Sent from my iPhone



*Montana Society
of Certified Public Accountants*

Mat Young, Vice President
State Regulatory & Legislative Affairs
American Institute of CPAs

Louise Dratler Haberman, Vice President
Information & Research
National Association of State Boards of Public Accountancy

Dear Mr. Young and Ms. Dratler Haberman,

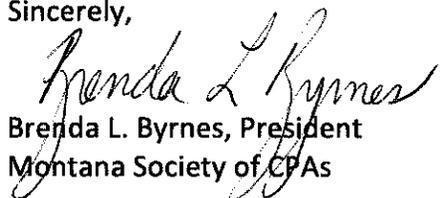
The Montana Society of CPAs is pleased to submit the following comments regarding the *Exposure Draft: Proposed Revisions to AICPA/NASBA Uniform Accountancy Act and NASBA Uniform Accountancy Act Rules, Section 6(d) and Rule 6-7.*

Our comments were compiled by a project team consisting of four CPAs: two retired and two with active licenses. This team expressed general support for this concept and feels it is needed given the number of accounting professionals reaching retirement age.

The Montana Society of CPAs feels that experience is as important as age and recommends that the language reflect in the rules that CPAs should be at least 55 years of age AND have held a CPA license in good standing for at least 20 years, at least five of those years in active status.

Thank you for the opportunity to comment on this Exposure Draft.

Sincerely,


Brenda L. Byrnes, President
Montana Society of CPAs


Jane Egan, Executive Director
Montana Society of CPAs

Julia Morriss

From: Nick Gales <nick.galescpa@sbcglobal.net>
Sent: Wednesday, November 04, 2015 12:14 PM
To: Retired Exposure Draft
Subject: Retired CPA

This appears to be more regulatory BS. A private citizen can perform these duties. So why should someone be a "Retired- CPA.?
Perhaps an opportunity for additional fees?

Nick L. Gales CPA, CVA, ABV, CFF, MAFF
Gales & Associates
13308 N Macarthur Blvd.
Oklahoma City, Oklahoma 73142
405-623-2578

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Julia Morriss

From: Nick Mastracchio <mast@nycap.rr.com>
Sent: Tuesday, November 03, 2015 4:18 PM
To: Louise Haberman
Cc: Retired Exposure Draft
Subject: exposure draft

Hi Louise

Sorry I could not make it to this year's annual NASBA meeting.

I am 72 years old and am teaching at the University of South Florida after retiring as managing partner of an upstate CPA firm of approximately 85 people.

I have been on the BOE, the ASB, and chaired the ERB.

I stopped practicing last June and no longer accept engagements or have malpractice insurance.

I want to be able to state that I am a CPA in dealing with various factions of academia. I am still active in NASBA and have kept my New York and Florida license current.

Since my activities no longer involve activities that require a license or involve the general public, I wonder why this new category would not also include sharing over 50 years of experience when being compensated to do so.

Nick Mastracchio

Nicholas J. Mastracchio, Jr. Ph.D. CPA

Licensed in New York and Florida



North Carolina State Board of Certified Public Accountant Examiners

January 25, 2016

Louise D. Haberman
Vice President, Information and Research
NASBA
12 East 49th Street, 17th Floor
New York, NY 10017

Dear Ms. Haberman:

The North Carolina State Board of CPA Examiners appreciates the opportunity to respond to the NASBA/AICPA Uniform Accountancy Act and NASBA Uniform Accountancy Act Rules Exposure Draft on Section 6(d) and Rule 6-7 regarding "Retired-CPA." Our Board's current rules have definitions for "active" and "inactive" (see attached). The Board's definition for "retired" was removed from the Board's rules effective January 1, 2014.

Because the Board is finishing up its 2015 rule-making process this month, we have not had time to review the Exposure Draft and discuss it with our stakeholders. Later this year, the Board will begin its annual review of rules, including the Exposure Draft, for possible rule-making.

Thank you again for the opportunity to provide this response.

Sincerely,

Michael H. Womble, CPA
President

Enclosure

cc: Mat Young, AICPA

21 NCAC 08A .0301 Definitions

(a) The definitions set out in G.S. 93-1(a) apply when those defined terms are used in this Chapter.

(1) "Active," when used to refer to the status of a person, describes a person who possesses a North Carolina certificate of qualification and who has not otherwise been granted "Inactive" status;

(20) "Inactive," when used to refer to the status of a person, describes a person who has requested inactive status and been approved by the Board and who does not use the title "certified public accountant" nor does he or she allow anyone to refer to him or her as a "certified public accountant," and neither he nor she nor anyone else refers to him or her in any representation as described in Rule .0308(b) of this Section.

Julia Morriss

From: Paul Cobb <pcobbjr@me.com>
Sent: Wednesday, November 04, 2015 1:38 PM
To: Retired Exposure Draft
Subject: Retired CPA Proposal

I think this is a very good proposal. It is very demeaning after having spent so many years in the profession that you are no longer able to denote that at one time you had the professional status as a CPA. I am presently keeping my status up although I am totally retired and am serving on not for profit boards and assisting in the VITA program.

You may contact me at the below listed email address or by phone.

Thanks

Sent from my iPad
Paul Cobb
pcobbjr@triad.rr.com
336-266-0642

Julia Morriss

From: Paul Steele <psteele@st-tel.net>
Sent: Wednesday, November 04, 2015 5:22 PM
To: Retired Exposure Draft
Subject: Retired CPA's as elected public officers

I am currently serving as an elected county commissioner. If you believe in truth in advertising, then wouldn't it be appropriate for our retired CPA's to disclose their prior service in campaign literature, and on their official stationery. I believe we need more people in elected positions that have our unique skill sets. Retired lawyers indicate their retired status with the designation "Of Council". I applaud your efforts to give our retired members this recognition. Paul M. Steele, retired CPA, retired Chair, Kansas Board of Accountancy, retired former board member NASBA, retired commissioner, Kansas Lottery Commission, current commissioner, Second District, Thomas County Kansas.

Sent from my iPad

Julia Morriss

From: Libby Wheat <libbywheat@gmail.com>
Sent: Monday, November 09, 2015 11:36 AM
To: Retired Exposure Draft
Subject: New classification for retired CPAs

Thank goodness. I've been retired 5 years. There is so much uncertainty in what I can or cannot do as a retired CPA. I have kept my CPE up and I can reactivate it thru my state board (I think), but who wants to take such a permanent and costly step to perform volunteer work which may not be permanent. If someone knows you were in public accounting for many years, they automatically assume competence and place a lot of trust in you. Many times I have bypassed something that looked fulfilling because of the hassle and unknown restrictions.

Please adopt the new classification and I would appreciate knowing my restrictions.

Rachel O. Thomas

Julia Morriss

From: Robert Callahan <rcallahan@cfpcorp.net>
Sent: Tuesday, December 22, 2015 11:58 AM
To: Retired Exposure Draft
Subject: Retired-CPA status

Ladies and Gentlemen:

I am responding to the proposal for a new "Retired-CPA" status.

I am retiring from my Corporation at the end of this month. In March of 2016, I will have been a Certified Public Accountant for 40 years. I have had positions in public and private practice. I am an active member of the Minnesota Society of CPAs. I have been most recently on the Estate and Personal Financial Planning Conference Committee for over 15 years. I am also a Personal Financial Specialist and Certified Financial Planner.

I plan on doing a significant amount of volunteer and philanthropic work during my retirement. I don't know how much of that work will involve activities normally attributed to public accounting or financial planning. But for me to simply say I am a Certified Public Accountant – Inactive, seems inadequate.

I realize that the association needs to maintain control over the quality of work performed by anyone associated with it. I feel confident you can come to the review process that could assist in ensuring that the work is of a high quality and accurate.

Please consider my position to be in favor the new retired status and I look forward to be able to use it in the future.

Sincerely,

Robert J Callahan CPA-Inactive/PFS, CFP

[website](#)

[map](#)

[bio](#)



ROBERT CALLAHAN, CPA/PFS, CFP®
President & CEO

A handwritten signature in blue ink that reads "Robert Callahan".

Callahan Financial Planning Corporation
1000 Radio Drive | Suite 100 | Woodbury, MN 55125
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Julia Morriss

From: Robert Neeley <neeleyr@FoodCity.com>
Sent: Friday, January 15, 2016 10:10 AM
To: Retired Exposure Draft
Subject: FW: Attached Image
Attachments: 1734_001.pdf

I certainly appreciate the fact that this problem is being addressed. As you can see from the attached letter, I was trying to maintain my Certificate in 1913. I had no response from the Board but kept asking questions and found that I could pay the fee and maintain the certificate. There is no designation of inactive or retired. My Tennessee says inactive.

Robert L. Neeley

From: canon
Sent: Friday, January 15, 2016 9:13 AM
To: Robert Neeley
Subject: Attached Image



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To: Mat Young, Vice President – State Regulatory & Legislative Affairs
Louise Dratler Haberman, Vice President – Information & Research

Exposure Draft: Proposed Revisions to AICPA/NASBA Uniform Accountancy Act and NASBA Uniform Accountancy Act Rules

RubinBrown LLP appreciates the opportunity to comment on the Proposed Revisions to AICPA/NASBA Uniform Accountancy Act and the NASBA Uniform Accountancy Act Rules. RubinBrown is a public accounting firm with approximately 500 total team members. Our practice focuses on private, public, nonprofit, and governmental organizations.

Overall, we strongly support the addition of the Retired-CPA status. This new addition would encourage continued societal contributions of retired CPAs, and also helps promote the CPA brand and the profession. RubinBrown would encourage a de minimis continuing professional education (CPE) requirement for retired CPAs, such as a few hours a year. This minimal requirement would ensure that a basic CPA competency would be met on an ongoing basis, which would be in the best interest of the marketplace, the retired CPA, and the profession.

Thank you for your continued efforts to improve the Uniform Accountancy Act and the Uniform Accountancy Act Rules. We believe this is an important endeavor and are grateful for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "RubinBrown LLP".

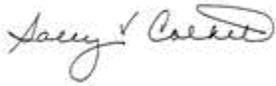
RubinBrown LLP

December 21, 2015

Julia Morriss

From: Colkett, Sally <sally.colkett@experis.com>
Sent: Thursday, November 05, 2015 9:28 AM
To: Retired Exposure Draft
Subject: Comment on Proposal for Retired CPA

I think the proposal is great as far as it goes. However, I would like to see the requirement for CPA's who have more than 10 years' experience as a CPA be lowered to 20 hours of CPE per year – all in A&A area – with a minimum of 8 hours per year on the current trends and new standards being implemented. I really think that anyone with extensive experience as a CPA should just have to show that they are keeping up to date on new developments and not waste their time on "filler" webinars and expensive seminars that really do not expand their knowledge. I think the requirements for relevancy of the A&A credits could be more rigorous – but the amount of credits overall is too high for experienced professionals.



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Julia Morriss

From: Steve Sherrill <ssherrill4889@gmail.com>
Sent: Friday, January 08, 2016 2:42 PM
To: Retired Exposure Draft
Subject: Commentary

The amendment proposed is certainly very good! However, it is something akin to a half an orgasm.

Surely, no one would be harmed if the retired CPA designation was allowed to prepare and sign a tax return as such.

Why was such an important item that retired CPAs are clearly competent to do not included in the change?

Respectfully submitted,

V. Steven Sherrill

ssherrill4889@gmail.com

732-854-1903 (Home)

973-214-4889 (Mobile)

(NJ address) **16 Sixth Avenue, Ortley Beach, N.J. 08751**

(Fla address) **1724 Sanctuary Pointe Court, Naples, Fla. 34110**

Julia Morriss

From: Buresh, Tom <BureshT@sva.com>
Sent: Tuesday, January 12, 2016 10:50 AM
To: Retired Exposure Draft
Cc: Jen Bailey; Jim Murphy
Subject: Retired CPA proposal

Greetings, Happy New Year!

I read with great interest the "Retired CPA" exposure draft.

After 43 years, I will be retiring May 31st, 5 months from age 65.

I sit on three volunteer non-profit boards, one as treasurer, and one board (Headstart program) that desires a CPA on its board.

I am the president of that board.

This proposal passing would allow me to fulfil these board obligations without change, And any hardship for the non-profit agency.

I support passage of the proposal.

Tom Buresh

Thomas G Buresh, CPA, CFP®, PFS

Vice President

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Julia Morriss

From: Warren Miller <wmiller@beckmill.com>
Sent: Thursday, November 05, 2015 8:43 AM
To: Retired Exposure Draft
Subject: Comment

Importance: High



To Whom It May Concern:

There should be some level of annual CPE—something in the range of 4-6 hrs.—that is directly related to the kind of returns that a retired CPA who intends to offer “volunteer tax preparation services if competent.” Otherwise, the ‘CPA brand’ could take yet another self-inflicted hit if the issue of competence is asserted without any supporting evidence.

R/S—

Warren Miller

| [Warren D. Miller, CFA, ASA, CPA](#) | Beckmill Research, LLC | Drawer 1158 | Lexington, VA 24450

|  : 540.463.6200, x2 |  : 540.463.6208 | Skype: beckmill |  | wmiller@beckmill.com
| *Value Maps: Valuation Tools That Unlock Business Wealth* | (John Wiley & Sons, 2010)

Julia Morriss

From: Bill Casey <wcasey2@myfairpoint.net>
Sent: Tuesday, December 01, 2015 5:46 PM
To: Retired Exposure Draft
Cc: lhaberman@nasba.org
Subject: Creating A "Retired CPA" Status in the UAA

Attention: Mat Young, Vice President-State Regulatory & Legislative Affairs, AICPA
Louise Dratler Haberman, Vice President, Information & Research, NASBA

I would like to commend the Board of Directors of both the AICPA and NASBA for approving this exposure changes to the Uniform Accountancy Act and the Model Rules that would provide for the creation of a "Retired CPA" status.

I am a 71 year old member of both the AICPA and the Massachusetts Society of CPA's (MSCPA) and a licensed CPA in both the states of Massachusetts and New Hampshire. I have been retired since 2008 and have continued to maintain my licenses although I issue no reports (audited or unaudited) on financial statements, offer no management advisory, financial advisory or consulting services, prepare no tax returns (except for close family members on an unpaid basis) and furnish no tax matters advice (except for close family members on an unpaid basis).

I have been a CPA for the past 45 years and would welcome and greatly appreciate having the opportunity to place the word "retired" adjacent to my CPA title on any business card, letterhead or any other document or device other than the CPA certificate itself and also enjoy some relief (expense, time and travel) from CPE Requirements.

After my retirement from a 28 year career at The Co-Operative Central Bank (where I served as President and CEO in my last 8 years), I began in 2009 to provide financial literacy seminars (45-90 minutes in duration) on a limited basis and within a reasonable commuting time. Presentations have been given in some some high school classrooms, on several college campuses, at several public libraries and for some civic organizations in Northeastern Massachusetts and Southern New Hampshire. These presentations may extend to Southern Maine in 2016 (proposal pending). These seminars are free to all attendees. They are not an investment, insurance or annuity sales presentation and no sales solicitation for any product is included or intended. No personal information is requested or collected. Refreshments and any financial trivia game awards may be sponsored by a local accounting firm, bank, other financial firm or the seminar host itself.

While there is a great need for financial literacy across a broad spectrum (from pre-school to beyond retirement, I have tried to focus on the young adults (starting with upper class high school students) and adults (through pre-retirement or retirement refresher) where I think the need is more immediate and the seminar information is (hopefully) more useful.

While the seminars may be for less than 2 hours, many days of research and preparation are spent for each so that power point slides, handout materials (to include reading references, a list of additional information website addresses and recycled financial magazines with highlighted articles) and presentation posters are current and useful to expected attendees.

Comment for your Consideration: I would recommend that an additional bullet be added to the exposure draft to also allow inactive CPA's , at least 55, to:

* Provide Financial Literacy Seminars to High Schools (or in K-12 school classrooms), Colleges and Universities, Public Libraries, Non-Profit Organizations and other Civic Organizations or Groups, if competent.

Thank you for the opportunity to provide this comment. I may be contacted at 617 960 6045 (cell phone) or at wcasey2@myfairpoint.net (email) should you have any questions.

William F. Casey, Jr., C.P.A.
52 Coventry Road
Atkinson, NH 03811