



February 23, 2021

Committee on Commerce  
Honorable, Robert Olson, Chair  
Kansas State Capitol

RE: Considerations for SB 137 – **Aron Dunn, CPA, member of the Kansas Society of CPAs (KSCPA)**

Thank you, Senator Olson, and Committee members, for the opportunity to provide information on SB 137 related to occupational licensing. On behalf of the Kansas Society of CPAs, the professional association representing over 2,500 Certified Public Accountants (CPAs) and accountants in Kansas, we offer the following perspectives of our member CPAs.

While we appreciate efforts to make job opportunities and licensure accessible in Kansas, we are concerned with the potential unintended consequences of SB 137. The bill reduces the Board of Accountancy's necessary discretion to effectuate its duties to protect the public by requiring the Board to consider applicants even if they would not be qualified under **existing well-established pathways**, which could lead to licensure of unqualified individuals.

- Kansas' existing licensing framework for the CPA licensure is already *substantially equivalent* to the procedures in place in the rest of the U.S. Thus, out-of-state applicants who apply for a reciprocal license are held to a uniform set of standards and meet minimal acceptance criteria to practice in the state.
- There is an important distinction between trade and vocational occupations and the highly complex, technical professions (CPAs, professional engineers, architects, etc.). These learned professions are vested with the responsibility to certify the quality and integrity of work and information and this "seal of approval" is a social contract with the public. Because of this, maintaining a baseline level of proven qualification and expertise is important to help protect the public from unqualified practitioners.
  - While all CPAs are accountants, not all accountants are CPAs. A CPA is a certified public accountant who has met specific state and education licensing requirements, met ethics requirements, and passed the CPA exam. CPAs are responsible for the financial integrity of information by which others rely upon when making decisions. As such, only *Certified Public Accountants* can perform certain services for the public. Allowing unqualified individuals to obtain a CPA license could be detrimental to the financial health of Kansas citizens.
  - Education and experience are important in highly technical, complex professions, but do not guarantee a licensure candidate has gained all the necessary knowledge and skills needed to safely practice certified public accountancy. The CPA exam plays a validation role, requiring applicants to demonstrate full proficiency.

National associations have worked with state licensure boards to implement model legislation and mutual recognition programs that get licensees to work quickly. The consistent licensing standards support career opportunity, mobility, and maintains an even playing field for CPAs across the US. The current mobility and substantially equivalent reciprocity systems in place for CPA licensure are working well and are effective. **Based on this information, the KSCPA respectfully requests that the Board of Accountancy be included in subsection (s) of SB 137.** Thank you in advance for your consideration.