



September 26, 2023

Ms. Julia Woislaw
Senior Manager, AICPA
220 Leigh Farm Rd
Durham, NC 27707
Julia.Woislaw@aicpa-cima.com

Dear Ms. Woislaw:

The Leadership in Accounting Education Section of the American Accounting Association (AAA), which consists of leaders of accounting departments and programs across the country, has reviewed with great interest the proposals put forth by the AICPA for addressing the dwindling pipeline of students who aspire to enter the accounting profession. As educators, we are on the front-lines of this pipeline decline and share the AICPA's sense of urgency about the need to take bold and creative actions to stem this tide. We have previously offered our thoughts about relevant considerations in a letter dated May 22, 2023. This letter is in reference to the draft request for proposals to participate in the Experience, Learn and Earn (ELE) Program newly developed by the AICPA and NASBA.

1. ELE Courses and Business Accredited Units

We are concerned that the courses offered in the ELE program may be offered through university units that are not included in any business or accounting unit accreditation review. For example, the current Tulane program courses are not offered through the AACSB accredited College of Business, but rather through the 'Tulane School of Professional Advancement'. It is imperative that any business or accounting courses offered by the ELE should be through academic units that are in scope for that university's business or accounting accreditation (e.g., AACSB, EQUIS, or ACBSP). Any university or college offering classes outside the business school must make an affirmative statement to prospective students that the courses are not offered by a business school and are therefore unlikely to be accepted for transfer credit by other business schools.

2. ELE Courses and Degree Credit

Early discussion of the ELE courses implied that these courses would not be applied to earning any degree. We are now told that such courses may count toward a graduate degree at the discretion of any university. We are concerned that any such degree may not be equivalent to the quality master's degree in accounting that the profession has previously demanded and that our university accounting programs have worked hard to develop and deliver. If such courses count toward a degree *and* are offered by units not in scope for business accreditation (point #1), we believe this an even greater concern. These courses should not lead to a graduate degree.

3. Evaluations of Success Based on Data

To evaluate the success of the ELE program it is important to have good data on CPA pass rates. Accounting programs, the AAA, professional service firms, and others have been requesting such data. Currently, we have no information regarding pass rates since 2018 nor do we have information about when pass rates will be available. We believe it is critical that NASBA provide data on CPA pass rates for all schools and candidates, including those earning hours through the proposed ELE program. Detailed data is needed on CPA exam candidates in order to evaluate candidate and program progress; this should include data on where students earn their credits (i.e., undergraduate institution, graduate institution, ELE) and what degrees, if any, they have completed. Improved data by programs and content is particularly important as exam changes are effective in 2024 and this will impact how the AICPA and states re-evaluate pipeline challenges.

Thank you for the opportunity to comment on this initiative.

Respectfully,



Gary A. McGill
President (2023-2024)
Leadership in Accounting Education Section of the AAA

Letter approved by the Board of the Leadership in Accounting Education Section of the AAA –
September 25, 2023.