

The Rules Committee of the Texas State Board of Public Accountancy is holding a meeting by online video conference call pursuant to §551.127 of the Open Meetings Act. The public may attend the meeting in-person at the office of the Board which is located at 505 E. Huntland Drive, Suite 370, Austin, Texas 78752. The Chair of the Rules Committee will be present at the 505 E. Huntland Drive location for the entirety of the meeting. In the alternative, the public may attend the meeting virtually using the following link.

Topic: Rules Meeting

Time: Sep 17, 2025 01:45 PM Central Time (US and Canada)

<https://www.zoomgov.com/j/1614147045?pwd=SoYFylCCqbG5BNLVezAZdO4xWd0rza.1>

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Agenda Item V(a)
Rules Committee Agenda
September 17, 2025
1:45 p.m.

- A. Discussion, consideration, and possible action concerning comments received on the *Chapter 511 Rules*.
- B. Schedule next meeting.

Agenda Item V(a)
Rules Committee Agenda
September 17, 2025
1:45 p.m.

- A. Discussion, consideration, and possible action concerning comments received on the *Chapter 511 Rules*.

DISCUSSION: At the July Board meeting the Board authorized the executive director to publish proposed amendments to the *Chapter 511 Rules* for the public's review and comment. The revisions are proposed in order to address the recent legislative changes to the *Public Accountancy Act*. The Board is attempting, at the request of academia, to provide guidance through these rule revisions as soon as possible in order to allow the state's colleges and universities time to implement the legislative changes by next year's fall academic session.

Responses from representatives of the TXCPA, Trinity University, and the CPA firm of Seidel Schroeder.

The staff has prepared for your consideration possible responses and recommendations to the comment letters.

RECOMMENDATION: That the Rules Committee recommend to the Board that the Board adopt the rules as published in the *Texas Register* with any revisions made by this committee.

SUGGESTED MOTION: Move that the committee recommend to the Board that the proposed rules published in the *Texas Register* be adopted by the Board with the inclusion of the revisions recommended in response to public comments.

CHAPTER 511 ELIGIBILITY
RULE §511.54 Recognized Texas Community Colleges.

(a) An applicant who has completed a baccalaureate or higher degree from a board recognized institution of higher education based on the requirements of §511.52 of this chapter (relating to Recognized Institutions of Higher Education), may enter into a course of study at a board recognized Texas community college to complete the educational requirements of §§511.57, and 511.58~~, and 511.60~~ of this chapter (relating to **Courses in an Accounting Concentration to take the UCPAE** ~~Qualified Accounting Courses to take the UCPAE~~, and ~~Definitions of~~ Related Business Subjects to take the UCPAE~~, and Qualified Accounting Courses Prior to January 1, 2024 to take the UCPAE~~).

(b) The board recognizes and accepts Texas community colleges that meet board standards for a comprehensive academic program based on the educational requirements of §§511.57, and 511.58~~, and 511.60~~ of this chapter.

(c) Effective August 1, 2015, the standards include at a minimum all, but are not limited to, the following:

(1) The Texas community college must be accredited by SACS.

(2) Academic accounting and business courses recognized as meeting §§511.57, and 511.58~~, and 511.60~~ of this chapter are deemed by the board as equivalent to upper level coursework at an institution of higher education and must contain a rigorous curriculum that is similar to courses offered in a baccalaureate degree program at a university. Accounting, business, and ethics courses must be developed by a group of full time accounting faculty members and approved by the board prior to offering to students. Modifications to an approved course must be reconsidered by the board prior to offering to students.

(3) Academic courses meeting §§511.57, and 511.58~~, and 511.60~~ of this chapter must be taken after completing a baccalaureate degree.

(4) The Texas community college must offer **at least** ~~no fewer than~~:

(A) **30** ~~27~~ semester hours of academic accounting courses meeting §511.57 ~~or~~ ~~§511.60~~ of this chapter; and

(B) **24** semester hours of academic business courses meeting §511.58 of this chapter~~;~~
and

1 ~~(C) a board-approved three semester hour ethics course meeting §511.59 of this~~
2 ~~chapter (relating to Qualifications for Issuance of a Certificate with not Fewer than 120~~
3 ~~Semester Hours) or §511.164 of this chapter (relating to Qualifications for Issuance of a~~
4 ~~Certificate with not Fewer than 150 Semester Hours]~~ [Definition of 150 Semester Hours
5 to Qualify for Issuance of a Certificate]).

6 (5) The Texas community college designates an accounting faculty member(s) who is
7 responsible for:

8 (A) managing the comprehensive academic program at all campuses;

9 (B) selecting and training qualified faculty members to teach the program courses and
10 regularly evaluating their effectiveness in the classroom;

11 (C) establishing and maintaining a rigorous program curriculum;

12 (D) establishing and maintaining a process for advising and guiding students through
13 the program; and

14 (E) providing annual updates to the board on the status of the academic program.

15 (6) Faculty members at a community college recognized and accepted by the board
16 must have the following credentials to teach academic courses meeting §§511.57, and
17 511.58[, and 511.60] of this chapter:

18 (A) Doctorate or master's degree in the teaching discipline; or

19 (B) Master's degree with a concentration in the teaching discipline (a minimum of 18
20 graduate semester hours in the teaching discipline).

21 (7) At least three-fourths of the faculty members who are responsible to teach academic
22 courses meeting §511.57 [or §511.60] of this chapter must hold a current CPA license.

23 (8) Faculty members will comply with the established educational definitions in §511.51
24 of this chapter (relating to Educational Definitions).

25 (9) The Texas community college will provide ongoing professional development for its
26 faculty as teachers, scholars, and CPA practitioners.

27 (10) The Texas community college will make available to students a resource library
28 containing current online authoritative literature to support the academic courses
29 meeting §§511.57, and 511.58[, and 511.60] of this chapter, and will incorporate the
30 online authoritative literature in accounting courses.

31 (d) A community college recognized and accepted by the board under this provision
32 must be reconsidered by the board on the fifth-year anniversary of the approval.

33 Information brought to the attention of the board by a student or faculty member of the

- 1 Texas community college that indicates non-compliance with the standards may cause
- 2 the board to accelerate reconsideration.

CHAPTER 511 ELIGIBILITY
RULE §511.56 Educational Qualifications under the Act to take the UCPAE.

(a) An applicant for the UCPAE under the current Act shall meet the following educational requirements ~~[at the time of filing the initial application to take the examination and]~~ in order to qualify to take the examination:

(1) hold a baccalaureate or graduate degree conferred by an institution of higher education as defined by §511.52 of this chapter (relating to Recognized Institutions of Higher Education) recognized by the board; and

(2) complete **at least** ~~[no fewer than]~~ 120 semester hours or quarter-hour equivalents of courses~~], as defined by §511.59 of this chapter (relating to Definition of 120 Semester Hours to take the UCPAE) and]~~ consisting of:

(A) **effective through July 31, 2026, at least** ~~[no fewer than]~~ 21 semester hours or quarter-hour equivalents of upper level accounting courses as defined by §511.57 of this chapter (relating to **Courses in an Accounting Concentration to take the UCPAE**); ~~[Qualified Accounting Courses to take the UCPAE) or §511.60 of this chapter (relating to Qualified Accounting Courses Prior to January 1, 2024 to take the UCPAE); and]~~

(B) effective August 1, 2026, at least ~~[no fewer than]~~ 24 semester hours or quarter-hour equivalents of upper level accounting courses as defined by §511.57 of this chapter; and

(C) ~~[(B)]~~ **at least** ~~[no fewer than]~~ 24 semester hours or quarter-hour equivalents of upper level related business courses, as defined by §511.58 of this chapter (relating to ~~[Definitions of]~~ Related Business Subjects to take the UCPAE).

(b) An individual holding a baccalaureate degree conferred by a board-recognized institution of higher education, as defined by §511.52 of this chapter, and who has not completed the requirements of this section shall meet the requirements by taking coursework in one of the following ways:

(1) complete upper level or graduate courses at a board-recognized institution of higher education as defined in §511.52 of this chapter that meets the requirements of subsections (a)(2)(A) and (a)(2)(B) of this section; or

(2) enroll in a board-recognized community college as defined in §511.54 of this chapter (relating to Recognized Texas Community Colleges) and complete board approved accounting or business courses that meet the requirements of

subsections (a)(2)(A) and (a)(2)(B) of this section. Only specified accounting and business courses that are approved by the board will be accepted as not all courses offered at a community college are accepted.

(c) The following courses, courses of study, certificates, and programs may not be used to meet the 120-semester hour requirement:

(1) remedial or developmental courses offered at an institution of higher education; and

(2) credits awarded for coursework taken through the following organizations and shown on a transcript from an institution of higher education may not be used to meet the requirements of this chapter:

(A) American College Education (ACE);

(B) Prior Learning Assessment (PLA);

(C) Defense Activity for Non-Traditional Education Support (DANTES);

(D) Defense Subject Standardized Test (DSST); and

(E) StraighterLine.

(d) The hours from a course that has been repeated will be counted only once toward the requirements of subsection (a)(2) of this section.

(e) ~~(b)~~ An applicant for the UCPAE who met the educational requirements of §§511.57 and 511.58 of this chapter ~~[the Act]~~ that were in effect at the time of ~~[taking the initial]~~ examination shall continue to be examined under those requirements unless the applicant ~~elects~~ ~~chooses~~ to meet the current education requirements of the ~~rules, in effect on August 1, 2026~~ ~~[Act]~~.

1 CHAPTER 511 ELIGIBILITY
2 RULE §511.57 **Courses in an Accounting Concentration to Take the UCPAE**
3 ~~[Qualified Accounting Courses to take the UCPAE].~~
4

5 (a) **Effective through July 31, 2026, an** [An] applicant shall meet the board's
6 accounting course requirements in one of the following ways:

7 (1) Hold a baccalaureate or higher degree from a board-recognized institution of higher
8 education as defined by §511.52 of this chapter (relating to Recognized Institutions of
9 Higher Education) and present official transcript(s) from board-recognized institution(s)
10 that show degree credit for **at least** ~~[no fewer than]~~ 21 semester credit hours of upper
11 division accounting courses as defined in subsections **(d) and** (e) ~~[(f) and (g)]~~ of this
12 section; or

13 (2) Hold a baccalaureate or higher degree from a board-recognized institution of higher
14 education as defined by §511.52 of this chapter, and after obtaining the degree,
15 complete the requisite 21 semester credit hours of upper division accounting courses,
16 as defined in subsections **(d) and** (e) ~~[(f) and (g)]~~ of this section, from four-year degree
17 granting institutions, or accredited community colleges, provided that all such
18 institutions are recognized by the board as defined by §511.52 or §511.54 of this
19 chapter (relating to Recognized Texas Community Colleges).

20 (b) Credit for hours taken at board-recognized institutions of higher education using the
21 quarter system shall be counted as 2/3 of a semester credit hour for each hour of credit
22 received under the quarter system.

23 (c) The board will accept **at least** ~~[no fewer than]~~ 21 semester credit hours of
24 accounting courses from the courses listed in subsections **(d) and** (e) ~~[(f) and (g)]~~ of
25 this section. The hours from a course that has been repeated will be counted only once
26 toward the required 21 semester hours. The courses must meet the board's standards
27 by containing sufficient accounting knowledge and application to be useful to candidates
28 taking the UCPAE. A board-recognized institution of higher education must have
29 accepted the courses for purposes of obtaining a baccalaureate or higher degree or its
30 equivalent, and they must be shown on an official transcript.

31 ~~[(d) Upper level accounting coursework recognized by the board and in effect prior to~~
32 ~~January 1, 2024, may be found in §511.60 of this chapter (relating to Qualified~~
33 ~~Accounting Courses Prior to January 1, 2024 to take the UCPAE).]~~

(d) The ~~[(e) Effective January 1, 2024, the]~~ subject-matter content should be derived from the UCPAE Blueprint. A minimum of 12 semester hours with at least three semester hours in each of the following accounting course content areas is required:

- (1) financial accounting and reporting for business organizations or intermediate accounting;
- (2) financial statement auditing;
- (3) taxation; and
- (4) accounting information systems or accounting data analytics.

(e) A ~~[(f) Effective January 1, 2024, a]~~ minimum of 9 hours in any of the following accounting course content areas is required:

- (1) up to 6 semester credit hours of additional financial accounting and reporting for business organizations or intermediate accounting;
- (2) advanced accounting;
- (3) accounting theory;
- (4) managerial or cost accounting (excluding introductory level courses);
- (5) auditing and attestation services;
- (6) internal accounting control and risk assessment;
- (7) financial statement analysis;
- (8) accounting research and analysis;
- (9) up to 9 semester credit hours of taxation (including tax research and analysis);
- (10) financial accounting and reporting for governmental and/or other nonprofit entities;
- (11) up to 9 semester credit hours of accounting information systems, including management information systems ("MIS"), provided the MIS courses are listed or cross-listed as accounting courses, and the institution of higher education accepts these courses as satisfying the accounting course requirements for graduation with a degree in accounting;
- (12) up to 9 semester credit hours of accounting data analytics, provided the institution of higher education accepts these courses as satisfying the accounting course requirements for graduation with a degree in accounting; business data analytics may be considered provided the courses are listed or cross-listed as accounting courses, and the institution of higher education accepts these courses as satisfying the accounting course requirements for graduation with a degree in accounting; (while data

analytics tools may be taught in the courses, application of the tools should be the primary objective of the courses);

(13) fraud examination;

(14) international accounting and financial reporting;

(15) mergers and acquisitions;

(16) financial planning;

(17) at its discretion, the board may accept up to three semester hours of credit of accounting course work with substantial merit in the context of a career in public accounting, provided the course work is predominantly accounting or auditing in nature but not included in paragraphs (1) - (16) of this subsection. For any course submitted under this provision, the Accounting Faculty Head or Chair must affirm to the board in writing the course's merit and content; and

(18) at its discretion, the board may accept up to three semester credit hours of independent study in accounting selected or designed by the student under faculty supervision. The curriculum for the course shall not repeat the curriculum of another accounting course that the student has completed.

(f) ~~[(g)]~~ The following types of introductory courses do not meet the accounting course definition in subsections **(d) and (e)** ~~[and (f)]~~ of this section:

- (1) elementary accounting;
- (2) principles of accounting;
- (3) financial and managerial accounting;
- (4) introductory accounting courses; and
- (5) accounting software courses.

(g) ~~[(h)]~~ Any CPA review course offered by an institution of higher education or a proprietary organization shall not be used to meet the accounting course definition.

(h) ~~[(i)]~~ CPE courses shall not be used to meet the accounting course definition.

(i) ~~[(j)]~~ An ethics course required in **§511.58(c) of this chapter (relating to Definitions of Related Business Subjects to take the UCPAE)** shall not be used to meet the accounting course definition in subsections (d) and (e) of this section. ~~[§511.164 of this chapter (relating to Qualifications for Issuance of a Certificate with not Fewer than 150 Semester Hours)] [§511.58(d) of this chapter (relating to Definitions of Related Business Subjects to take the UCPAE) shall not be used to meet the accounting course definition in subsections (e) and (f) of this section.]~~

(j) ~~(k)~~ Accounting courses completed through an extension school of a board recognized educational institution may be accepted by the board provided that the courses are accepted for a business baccalaureate or higher degree conferred by that educational institution.

(k) ~~(j)~~ The board may review the content of accounting courses and determine if they meet the requirements of this section.

(l) ~~(m)~~ Credits awarded for coursework taken through the following organizations and shown on a transcript from an institution of higher education may not be used to meet the requirements of this chapter:

- (1) American College Education (ACE);
- (2) Prior Learning Assessment (PLA);
- (3) Defense Activity for Non-Traditional Education Support (DANTES);
- (4) Defense Subject Standardized Test (DSST); and
- (5) Straighterline.

(m) Effective August 1, 2026, to take the UCPAE, a minimum of 12 semester hours of upper level accounting courses, with at least three semester hours from each of subparagraphs (1) through (4) of this subsection, must be completed at a board-recognized institution of higher education and shown on an official transcript from the institution:

(1) financial accounting and reporting for business organizations or intermediate accounting;

(2) financial statement auditing;

(3) taxation; and

(4) accounting information systems or accounting data analytics.

(n) In addition to subsection (m) of this section, a minimum of 12 hours in any of the following upper level accounting course content areas must be completed at a board-recognized institution of higher education and shown on an official transcript from the institution, provided the course was not used to meet subsection (m) of this section:

(1) financial accounting and reporting for business organizations or intermediate accounting;

(2) advanced accounting;

(3) accounting theory;

(4) managerial or cost accounting (excluding introductory level courses);
(5) auditing and attestation services;
(6) internal accounting control and risk assessment;
(7) financial statement analysis;
(8) accounting research and analysis;
(9) taxation (including tax research and analysis);
(10) financial accounting and reporting for governmental and/or other nonprofit
entities;
(11) accounting information systems, including management information systems
(MIS), provided the MIS courses are listed or cross-listed as accounting courses,
and the institution of higher education accepts these courses as satisfying the
accounting course requirements for graduation with a degree in accounting;
(12) accounting data analytics;
(13) fraud examination;
(14) international accounting and financial reporting;
(15) mergers and acquisitions;
(16) financial planning; and
(17) up to three semester credit hours of independent study in accounting
selected or designed by the student under faculty supervision. The curriculum for
the course shall not repeat the curriculum of another accounting course that the
student has completed.

(o) The board may review the content of accounting courses to determine if they
meet the requirements of subsections (m) and (n) of this section, and to
determine if courses contain sufficient accounting knowledge and application to
be useful to candidates taking the UCPAE.

(p) A course that was repeated will be counted only once to meet the
requirements of subsections (m) and (n) of this section.

(q) Credit for hours taken at board-recognized institutions of higher education
using the quarter system shall be counted as 2/3 of a semester credit hour for
each hour of credit received under the quarter system.

(r) The board may accept up to three semester hours of credit of accounting
course if:

1 (1) the course work has substantial merit in the context of a career in public
2 accounting;

3 (2) the course work is predominantly accounting or auditing in nature but not
4 included in subsections (m) and (n) of this section; and

5 (3) the merit and content of the course submitted under this subsection is
6 affirmed by the Accounting Faculty Head or Chair at the educational institution
7 where the course was completed.

8 (s) The following types of courses do not meet the accounting course definition
9 in subsections (m), (n) and (r) of this section:

10 (1) elementary accounting;

11 (2) principles of accounting;

12 (3) financial and managerial accounting;

13 (4) introductory accounting courses;

14 (5) accounting software courses;

15 (6) any CPA review course offered by an institution of higher education or a
16 proprietary organization;

17 (7) CPE courses; and

18 (8) an ethics course required in §511.58 of this chapter (relating to Related
19 Business Subjects to take the UCPAE). [§511.59 of this chapter (relating to
20 Qualifications for Issuance of a Certificate with not Fewer than 120 Semester Hours) or
21 §511.164 of this chapter (relating to Qualifications for Issuance of a Certificate with not
22 Fewer than 150 Semester Hours).]

23 (t) Accounting courses completed through an extension school of a board-
24 recognized educational institution may be accepted by the board provided that
25 the courses are accepted for a business baccalaureate or higher degree
26 conferred by that educational institution.

27 (u) Credits awarded for coursework taken through the following organizations
28 and shown on a transcript from an institution of higher education may not be
29 used to meet the requirements of this chapter:

30 (1) American College Education (ACE);

31 (2) Prior Learning Assessment (PLA);

32 (3) Defense Activity for Non-Traditional Education Support (DANTES);

33 (4) Defense Subject Standardized Test (DSST); and

1 **(5) Straighterline.**

4 (a) Related business courses are those business courses that a board recognized
5 institution of higher education accepts for a business baccalaureate or higher degree by
6 that educational institution.

7 **(b) The board will accept a minimum of ~~[no fewer than]~~ 21 credit hours of upper**
8 **level courses (for the purposes of this subsection, economics and statistics at**
9 **any college level will count as upper level courses) as related business subjects,**
10 **taken at a recognized educational institution shown on official transcripts or**
11 **accepted by a recognized educational institution for purposes of obtaining a**
12 **baccalaureate degree or its equivalent, in the following areas. ~~[No more than 6~~**
13 **credit semester hours taken in any of the following subject areas may be used to**
14 **meet the minimum hour requirement:]**

15 **(1) business law, including study of the Uniform Commercial Code;**

16 **(2) economics;**

17 **(3) management;**

18 **(4) marketing;**

19 **(5) business communications;**

20 **(6) statistics and quantitative methods;**

21 **(7) information systems or technology;**

22 **(8) finance and financial planning;**

23 **(9) data analytics, data interrogation techniques, cyber security and/or digital**
24 **acumen in the accounting context;**

25 **(10) no more than 6 credit semester hours of upper level business or accounting**
26 **internship taken at a board recognized educational institution of higher**
27 **education; and**

28 **(11) other areas related to accounting.**

29 **(c) The board requires a three semester hour accounting or business ethics**
30 **course that includes a framework of ethical reasoning, including the core values**
31 **of integrity, objectivity, and independence, professional values, and attitudes for**
32 **exercising professional skepticism and other behavior in the best interest of the**
33 **public and profession and shall include the ethics rules of the AICPA and the**

SEC. The course may be taken to meet the education requirements of §511.56 of this chapter (related to Educational Qualifications under the Act to take the UCPAE); or the certification requirements of §511.59 of this chapter (related to Qualifications for Issuance of a Certificate with not Fewer than 120 Semester Hours); or §511.164 of this chapter (related to Qualifications for Issuance of a Certificate with not Fewer than 150 Semester Hours).

(d) ~~(c)~~ The board may review the content of business courses and determine if they meet the requirements of this section.

~~[(b) An individual who holds a baccalaureate or higher degree from a recognized educational institution as defined by §511.52 of this chapter (relating to Recognized Institutions of Higher Education) may take related business courses from four-year degree-granting institutions, or recognized community colleges, provided that all such institutions are recognized by the board as defined by §511.52 or §511.54 of this chapter (relating to Recognized Texas Community Colleges). Related business courses taken at a recognized community college are only the courses that the board has reviewed and approved to meet this section.]~~

~~[(c) The board will accept no fewer than 24 semester credit hours of upper level courses (for the purposes of this subsection, economics and statistics at any college level will count as upper division courses) as related business subjects (without repeat), taken at a recognized educational institution shown on official transcripts or accepted by a recognized educational institution for purposes of obtaining a baccalaureate degree or its equivalent, in the following areas:]~~

~~[(1) No more than 6 credit semester hours taken in any of the following subject areas may be used to meet the minimum hour requirement:]~~

~~[(A) business law, including study of the Uniform Commercial Code;]~~

~~[(B) economics;]~~

~~[(C) management;]~~

~~[(D) marketing;]~~

~~[(E) business communications;]~~

~~[(F) statistics and quantitative methods;]~~

~~[(G) information systems or technology; and]~~

~~[(H) other areas related to accounting.]~~

1 ~~[(2) No more than 9 credit semester hours taken in any of the following subject areas~~
2 ~~may be used to meet the minimum hour requirement:]~~

3 ~~[(A) finance and financial planning; and]~~

4 ~~[(B) data analytics, data interrogation techniques, cyber security and/or digital acumen~~
5 ~~in the accounting context, whether taken in the business school or in another college or~~
6 ~~university program, such as the engineering, computer science, information systems, or~~
7 ~~math programs (while data analytic tools may be used in the course, application of the~~
8 ~~tools should be the primary objective of the course).]~~

9 ~~[(d) The board requires that a minimum of 2 upper level semester credit hours in~~
10 ~~accounting communications or business communications with an intensive writing~~
11 ~~curriculum be completed. The semester hours may be obtained through a standalone~~
12 ~~course or offered through an integrated approach. If the course content is offered~~
13 ~~through integration, the university must advise the board of the course(s) that contain~~
14 ~~the accounting communications or business communications content. The course may~~
15 ~~be used toward the 24 semester credit hours of upper level business courses listed in~~
16 ~~subsection (c)(1) of this section.]~~

17 ~~(e) [(d)] [(e)]~~ Credit for hours taken at recognized institutions of higher education using
18 the quarter system shall be counted as 2/3 of a semester hour for each hour of credit
19 received under the quarter system.

20 **(f) [(e)] A course that was repeated will be counted only once to meet the**
21 **requirements of this section.**

22 **(g) [(f)]** Related business courses completed through and offered by an extension
23 school, correspondence school, or continuing education program of a board recognized
24 educational institution may be accepted by the board, provided that the courses are
25 accepted for a business baccalaureate or higher degree conferred by that educational
26 institution.

27 ~~[(g) The board may review the content of business courses and determine if they meet~~
28 ~~the requirements of this section.]~~

29 **(h) (g) [(h)]** Credits awarded for coursework taken through the following organizations
30 and shown on a transcript from an institution of higher education may not be used to
31 meet the requirements of this chapter:

32 (1) American College Education (ACE);

33 (2) Prior Learning Assessment (PLA);

- 1 (3) Defense Activity for Non-Traditional Education Support (DANTES);
- 2 (4) Defense Subject Standardized Test (DSST); and
- 3 (5) StraighterLine.

1 CHAPTER 511 ELIGIBILITY
2 RULE §511.59 Qualifications for Issuance of a Certificate with not Fewer than 120
3 Semester Hours ~~[Definitions of 120 Semester Hours to take the UCPAE].~~
4

5 (a) Effective August 1, 2026, an ~~[initial]~~ applicant who meets the education
6 requirements of §§511.56, 511.57 and 511.58 of this chapter (relating to
7 Educational Qualifications under the Act to take the UCPAE, Courses in an
8 Accounting Concentration to take the UCPAE, and Related Business Subjects to
9 take the UCPAE), ~~may elect [and elects] to [take the UCPAE may]~~ qualify for CPA
10 certification by completing the requirements in subsections (b) and (c) of this
11 section.

12 (b) An applicant for CPA certification under this section shall complete ~~[the~~
13 following additional education requirements:]

14 ~~[(1) additional]~~ upper level accounting courses as defined by §511.57 of this
15 chapter equal to or in excess of ~~[equals or exceeds]~~ 27 semester hours or
16 quarter-hour equivalents of upper level accounting courses; and

17 ~~[(2) a three-semester hour board-approved standalone course in accounting or~~
18 ~~business ethics. The course must be taken at a board-recognized educational~~
19 ~~institution and should provide students with a framework of ethical reasoning,~~
20 ~~professional values, and attitudes for exercising professional skepticism, and~~
21 ~~other behavior in the best interest of the public and profession. The ethics course~~
22 ~~shall:~~

23 ~~(A) include the ethics rules of the AICPA, the SEC, and the board;~~

24 ~~(B) provide a foundation for ethical reasoning, including the core values of~~
25 ~~integrity, objectivity, and independence; and~~

26 ~~(C) be taught by an instructor who has not been disciplined by the board for a~~
27 ~~violation of the board's rules of professional conduct, unless that violation has~~
28 ~~been waived by the board.]~~

29 (c) The work experience shall be at least ~~[not fewer than]~~ two years of full time,
30 non-routine accounting experience as defined by §§511.122 and 511.123 of this
31 chapter (relating to Acceptable Work Experience and Reporting Work Experience)
32 and supervised by a CPA as defined by §511.124 of this chapter (relating to
33 Acceptable Supervision).

1 ~~[(a) To be eligible to take the UCPAE, an applicant must hold at a minimum a~~
2 ~~baccalaureate degree, conferred by a board-recognized institution of higher education~~
3 ~~as defined by §511.52 of this chapter (relating to Recognized Institutions of Higher~~
4 ~~Education), and have completed the board-recognized coursework identified in this~~
5 ~~section:]~~
6 ~~[(1) no fewer than 21 semester hours or quarter-hour equivalents of upper level~~
7 ~~accounting courses as defined by §511.57 of this chapter (relating to Qualified~~
8 ~~Accounting Courses) or §511.60 of this chapter (relating to Qualified Accounting~~
9 ~~Courses Prior to January 1, 2024 to take the UCPAE);]~~
10 ~~[(2) no fewer than 24 semester hours or quarter-hour equivalents of upper level related~~
11 ~~business courses, as defined by §511.58 of this chapter (relating to Definitions of~~
12 ~~Related Business Subjects to take the UCPAE); and]~~
13 ~~[(3) academic coursework at an institution of higher education as defined by §511.52 of~~
14 ~~this chapter, when combined with paragraphs (1) and (2) of this subsection meets or~~
15 ~~exceeds 120 semester hours.]~~
16 ~~[(b) An individual holding a baccalaureate degree conferred by a board-recognized~~
17 ~~institution of higher education, as defined by §511.52 of this chapter, and who has not~~
18 ~~completed the requirements of this section shall meet the requirements by taking~~
19 ~~coursework in one of the following ways:]~~
20 ~~[(1) complete upper level or graduate courses at a board-recognized institution of higher~~
21 ~~education as defined in §511.52 of this chapter that meets the requirements of~~
22 ~~subsection (a)(1) and (2) of this section; or]~~
23 ~~[(2) enroll in a board-recognized community college as defined in §511.54 of this~~
24 ~~chapter (relating to Recognized Texas Community Colleges) and complete board~~
25 ~~approved accounting or business courses that meet the requirements of subsection~~
26 ~~(a)(1) and (2) of this section. Only specified accounting and business courses that are~~
27 ~~approved by the board will be accepted as not all courses offered at a community~~
28 ~~college are accepted.]~~
29 ~~[(c) The following courses, courses of study, certificates, and programs may not be used~~
30 ~~to meet the 120-semester hour requirement:]~~
31 ~~[(1) any CPA review course offered by an institution of higher education or a proprietary~~
32 ~~organization;]~~
33 ~~[(2) remedial or developmental courses offered at an educational institution; and]~~

1 ~~[(3) credits awarded for coursework taken through the following organizations and~~
2 ~~shown on a transcript from an institution of higher education may not be used to meet~~
3 ~~the requirements of this chapter:]~~
4 ~~[(A) American College Education (ACE);]~~
5 ~~[(B) Prior Learning Assessment (PLA);]~~
6 ~~[(C) Defense Activity for Non-Traditional Education Support (DANTES);]~~
7 ~~[(D) Defense Subject Standardized Test (DSST); and]~~
8 ~~[(E) StraighterLine.]~~
9 ~~[(d) The hours from a course that has been repeated will be counted only once toward~~
10 ~~the required 120 semester hours.]~~

CHAPTER 511 ELIGIBILITY
RULE §511.164 **Qualification for Issuance of a Certificate with not Fewer than 150 Semester Hours** ~~[Definition of 150 Semester Hours to Qualify for Issuance of a Certificate].~~

(a) To qualify for the issuance of a CPA certificate, an applicant must hold at a minimum a baccalaureate degree, conferred by a board-recognized institution of higher education as defined by §511.52 of this chapter (relating to Recognized Institutions of Higher Education), and have completed the board-recognized coursework identified in **paragraphs (1), or (2), and (3) – (5)** this section:

(1) effective through July 31, 2026, at least ~~[no fewer than]~~ 27 semester hours or quarter-hour equivalents of upper level accounting courses as defined by §511.57 of this chapter (relating to **Courses in an Accounting Concentration to take the UCPAE) to include a minimum of two semester credit hours in research and analysis;** ~~[Qualified Accounting Courses to take the UCPAE) or §511.60 of this chapter (relating to Qualified Accounting Courses Prior to January 1, 2024 to take the UCPAE) to include a minimum of two semester credit hours in research and analysis;]~~

2) Effective August 1, 2026, at least ~~[no fewer than]~~ 30 semester hours or quarter-hour equivalents of upper level accounting courses as defined by §511.57 of this chapter;

(3) [(2)] no fewer than **24** ~~[21]~~ **[24]** semester hours or quarter-hour equivalents of upper level related business courses, as defined by §511.58 of this chapter (relating to ~~[Definitions of]~~ Related Business Subjects to take the UCPAE);

~~[(4) [(3)] a three semester hour board-approved standalone course in accounting or business ethics. The course must be taken at a board-recognized educational institution and should provide students with a framework of ethical reasoning, professional values, and attitudes for exercising professional skepticism and other behavior in the best interest of the public and profession. The ethics course shall:~~

~~(A) include the ethics rules of the AICPA, the SEC, and the board;~~

~~(B) provide a foundation for ethical reasoning, including the core values of integrity, objectivity, and independence; and~~

~~(C) be taught by an instructor who has not been disciplined by the board for a violation of the board's rules of professional conduct, unless that violation has been waived by the board; and]~~

~~(4) (5)~~ although not required to meet subsection (a) ~~(5) (6)~~ of this section, the board may accept not more than six hours or quarter hour equivalents of ~~upper level~~ CPA review coursework completed at a board-recognized ~~an~~ institution of higher education; and

~~(5) (6) (4)~~ academic coursework at an institution of higher education as defined by §511.52 of this chapter, when combined with paragraphs (1) – ~~(4) (5) (3)~~ of this subsection meets or exceeds 150 semester hours~~, of which 120 semester hours meets the education requirements defined by §511.59 of this chapter (relating to Definition of 120 Semester Hours to take the UCPAE))~~. An applicant who has met paragraphs (1) – ~~(3) (4) (3)~~ of this subsection may use a maximum of 9 total semester credit hours of undergraduate or graduate independent study and/or internships as defined in §511.51(b)(4) or §511.51(b)(5) of this chapter (relating to Educational Definitions) to meet this paragraph. The courses shall consist of:

(A) a maximum of three semester credit hours of independent study courses; and
(B) a maximum of six semester credit hours of accounting/business course internships **including the coursework used to meet §511.58 of this chapter (relating to Related Business Subjects to take the UCPAE).**

(b) The following courses, courses of study, certificates, and programs may not be used to meet the 150 semester hour requirement:

~~((1) any CPA review course offered by an institution of higher education or a proprietary organization;)~~

~~(1) (2)~~ remedial or developmental courses offered at an educational institution; and
~~(2) (3)~~ credits awarded for coursework taken through the following organizations and shown on a transcript from an institution of higher education may not be used to meet the requirement of this chapter:

(A) American College Education (ACE);
(B) Prior Learning Assessment (PLA);
(C) Defense Activity for Non-Traditional Education Support (DANTES);
(D) Defense Subject Standardized Test (DSST); and
(E) StraighterLine.

(c) The hours from a course that has been repeated will be counted only once toward the required semester hours.

1 (d) The work experience shall be at least [not fewer than] one year of full-time
2 non-routine accounting experience as defined by §§511.122 and 511.123 of this
3 chapter (relating to Acceptable Work Experience and Reporting Work Experience)
4 and supervised by a CPA as defined by §511.124 of this chapter (relating to
5 Acceptable Supervision).

Agenda Item V(a)
Rules Committee Agenda
September 17, 2025
1:45 p.m.

- The Following materials contain comments the board has received in response to the proposed revisions to the *Chapter 511 Rules*. The staff has prepared responses to the comments for the Rules Committee and the Board's consideration.

August 22, 2025

Mr. J. Randel (Jerry) Hill
General Counsel
Texas State Board of Public Accountancy
505 E. Huntland Drive, Suite 380
Austin, Texas 78752

via email: jhill@tsbpa.texas.gov

RE: Texas Society of Certified Public Accountants Comments on Proposed TSBPA Rules

Dear Mr. Hill,

The Texas Society of Certified Public Accountants (TXCPA) is a nonprofit, voluntary professional organization representing more than 28,000 members. The TXCPA appreciates the opportunity to comment on the rules that have been proposed by the Texas State Board of Public Accountancy (TSBPA) recently published in the Texas Register.

TXCPA was instrumental in advocating for Senate Bill 262 (CPA pathways legislation) during the 89th Session. TXCPA has been advocating for and seeking solutions to the CPA pipeline issue for many years, working closely with national organizations, other state CPA societies, educators, practitioners, candidates, and students.

The rules proposed are an important aspect of implementing Senate Bill 262 and TXCPA has a strong interest in insuring that the rules meet the legislative intent of SB 262, and equally important, are simple and straightforward for candidates/students, educators, and employers to understand and follow. TXCPA has long sought to remove any unnecessary barriers to CPA licensure.

Intent of Senate Bill 262

The intent of Senate Bill 262 was to create an additional pathway to CPA licensure while maintaining the existing educational pathway (150-hour pathway). The additional pathway to licensure was passed to enable a candidate to be eligible for a CPA certificate if the candidate completes a baccalaureate degree (or equivalent courses) as determined by Board rule, two years of work experience and passage of the Uniform CPA Examination. Senate Bill 262 does not contemplate that additional hours beyond a baccalaureate degree are required for licensure under the new pathway.

While TXCPA understands that different students have diverse needs, circumstances, educational needs, time, and financial commitments, SB 262 was passed to enable students to meet the educational requirements within a baccalaureate framework. The rules relating to SB 262 and the additional pathway need to recognize the legislative intent and the rules need to be adopted, and amended, that will ensure that universities can offer, and students can complete, the educational requirements with a bachelor's degree.

As a regulatory body, the Board is bound to implement - not expand upon - the Legislature's directive. Any rule that imposes requirements beyond the plain language of SB 262 risks exceeding statutory authority and could undermine legislative intent.

The intent was to create an additional pathway to CPA licensure that offered students an alternative option to maintain rigor and expand access beyond the traditional 150-hour pathway. Rules to accommodate the new pathway need to be varied to accommodate the difference between a bachelor's degree and 150 hours. Any rules that require a student to take more hours than can be completed within a bachelor's degree goes against the legislative intent of SB 262.

Proposed Rules

TXCPA recommends that the State Board engage in a thorough review of all the Board rules to ensure that rules are easy to understand, easy to follow, simple to explain to candidates, and do not include unnecessary burdens to licensure. TXCPA has heard from educators, practitioners, and candidates about the complicated nature of the rules, the difficulty in understanding the language and phraseology employed, the length of the rules, the lack of clarity, and the proscriptive nature of the rules.

Overly prescriptive rules not only create compliance burdens but also risk discouraging otherwise qualified candidates from pursuing licensure. In a competitive labor market, Texas cannot afford to lose talent to other jurisdictions that have clearer, more accessible rules.

Consistency with the Uniform Accountancy Act (UAA) is also critical for maintaining national mobility. If Texas rules diverge materially from other states, license portability and reciprocity could be jeopardized, creating significant administrative challenges for both licensees and firms with multistate practices.

§ 511.57 Courses in an Accounting Concentration to take the UCPAE and §511.59 Qualification for Issuance of a Certificate with not Fewer than 120 Semester Hours

Proposed Rules 511.57 and 511.59 address the qualifications to sit for the UCPAE (CPA exam) and to be licensed under the new pathway.

TXCPA strongly recommends that students who utilize the new pathway to licensure (bachelor's degree) should have to meet the same educational requirements to sit for the exam as to become licensed. Once a candidate is qualified to sit for the exam, no additional accounting coursework should be required for licensure. Mandating additional coursework beyond completion of a bachelor's degree contradicts the plain and unambiguous language and intent of SB 262. The additional pathway passed in Senate Bill 262 contemplates a rebalancing of the licensing requirements and not an equivalency to the traditional 150-hour pathway.

Under the new additional pathway, both the ability to test and the licensure requirement should require 24 hours of upper-level accounting. Candidates can take additional accounting or other coursework as they feel necessary, but a mandate to take coursework over and above courses

required under SB 262's bachelor's degree requirement is an unnecessary burden to licensure that SB 262 seeks to avoid. The 24 hours of upper-level accounting is consistent with the UAA model statute and the model rules. (<https://nasba.org/app/uploads/2018/02/UAA-Model-Rules---January-2018.pdf>)

§ 511.164 Qualifications for Issuance of a Certificate with not Fewer than 150 Semester Hours

TXCPA believes that proposed Rule 511.164 properly addresses accounting coursework (30 hours of upper-level accounting) for licensure under the 150-hour pathway. However, TXCPA has concerns with the reference back to Rule 511.57, which sets out the upper-level accounting coursework that is acceptable and the "buckets" of courses that must be completed under Rule 511.57(m) and (n). These specific requirements as to what courses must be completed and what number of hours must be taken from each "bucket" provide another burden to candidates on their path to licensure.

TXCPA's position is that it should be up to the approved and accredited institutions of higher education to determine which courses they advise students to take to give students the best chance of success. Mandating specific courses and credits from specific buckets makes the candidate experience cumbersome and difficult for professors to adequately advise students. Higher education institutions are in the best position to provide guidance to students on coursework. TXCPA proposes the elimination of "buckets" of courses and suggests that more emphasis should focus on the number of hours (24 or 30) that need to be completed and merely provide an illustrative list of coursework that will meet the hours requirements rather than mandated hours. During the transition period as more states move to individual mobility, it is vitally important that states attempt to be aligned in the educational requirements to become licensed. Differences in educational requirements can be a burden to licensees as they seek to become licensed in other states.

§ 511.59 and 511.164 Relating to Mandated Ethics Course to Become Licensed

TXCPA recommends the elimination of the separate and additional three-hour ethics requirement to become licensed. Accounting ethics is currently included in the core accounting coursework such as Audit and Tax 1 and Tax 2. While ethics courses are extremely important, it is equally important that students have a core accounting education that can be completed within a bachelor's degree as set out in SB 262. The elimination of the ethics requirement would open additional space within the upper-level accounting credits for the completion of other accounting coursework.

In place of a required ethics course to be included in the upper-level accounting framework, TXCPA recommends adding an ethics requirement outside of the traditional higher education environment. The current proposed rule contemplates an ethics course to be completed as part of the core accounting coursework but would take a candidate's total hours beyond a bachelor's degree. This is contrary to the legislative intent of SB 262, which unambiguously states that a license can be granted after the completion of a bachelor's degree. The proposed rule would mandate additional hours beyond a bachelor's degree, which is not permitted under SB 262.

Creating an ethics course outside of the higher education environment could include safeguards relating to content, scope, presentation, and topics. TXCPA is willing to work with the State Board on developing an alternative ethics course that provides a strong understanding of the State Board rules and will position candidates to get a better understanding of accounting ethics beyond what is already incorporated in many upper-level accounting courses.

Possible solutions to the ethics component could be to require an ethics course to be completed during the first CPE period following licensure or mandate an ethics course be completed before licensure, but not as part of the mandated coursework requirements.

Business Courses

The proposed rules decrease the number of required business courses for both the traditional 150-hour pathway and the new bachelor's pathway. The business hours are reduced from 24 hours to 21 hours under all pathways.

TXCPA proposes that all pathways require 24 hours of business coursework. Today's work environment and the CPA profession require individuals to be well-rounded professionals. Maintaining the number of business hours at 24 would better prepare candidates to face a myriad of business issues that will arise in their careers. Twenty-four hours of business courses is consistent with what is currently outlined in the UAA and model rules.

Transition Between Current and New Licensing Pathways

A significant issue has been raised by candidates and CPA firms about the licensing process for those students who are currently taking their required education – completing their bachelor's degree but have not yet completed or started the extra 30 hours – and have begun or are about to begin taking the CPA exam. The issue that arises is how to accommodate these students who are in between the current and new additional pathway and under what law they can become licensed.

Senate Bill 262 clearly states that a person can become licensed with a bachelor's degree and the required accounting coursework. The effective date of the legislation is August 1, 2026. Senate Bill 262 does not expressly address the issue of when a person completes the educational requirements, but only states when a person can receive a certificate of licensure under the additional pathway.

Currently, the process for licensure begins with an Application of Intent (AOI). The TSBPA considers the AOI filing date as the determinative date as to what law applies to licensure. Under normal circumstances when there was only the 150-hour pathway that has been in existence for many years, the date the AOI was filed did not have the significance it has during a time of transition between the current law and the soon-to-be enacted law. The AOI, pursuant to Rule 511.22, is intended to determine that candidates comply and are eligible to take the CPA exam. The actual issuance of the certificate is not tied to the AOI in law or in rule. Additionally, there is no legal requirement that a license must be conferred immediately upon passage of the exam and the completion of work experience.

Senate Bill 262 did not include any mandates or prohibitions on what TSBPA may do when it comes to transitioning between the current law and SB 262 with an 8/1/26 effective date. There is nothing in the law that would prevent the Board from adopting a rule or policy that would accommodate a later issuance of the certificate after 8/1/26 to accommodate those students who meet the SB 262 requirements for licensure today or before 8/1/26, but allowing them to get “officially licensed” after 8/1/26.

TXCPA recommends the State Board either adopt a rule or policy addressing students who have previously filed an AOI to allow them to retract a previously submitted AOI and to file a new AOI allowing for the completion of the educational requirements under the new pathway. Full licensure under the new pathway would not occur until after 8/1/26, but would allow students who have completed 120 hours, passed the exam, and completed two years of work experience to become formally licensed after 8/1/26. It has come to TXCPA’s attention that a sizable number of candidates currently working with CPA firms who are caught in between the current law and new law may well forego the extra 30 hours of education and not get licensed unless they could be afforded some transition relief. The added time commitments and expenses are barriers that SB 262 seeks to lessen. Allowing those students to delay the formal licensing requirement until 8/1/26 would benefit the CPA pipeline.

CPA Exam Review Courses

Proposed Rule 511.164 Qualifications for Issuance of a Certificate with not Fewer than 150 Semester Hours addresses the acceptance of CPA review courses to count towards licensing educational requirements.

The language is unclear as to whether the CPA review courses count towards upper-level accounting courses, business courses or some other category. TXCPA recommends that Rule 511.164 be amended to make it clear that CPA review courses should count towards three hours of accounting and three hours of business coursework.

Further clarification of Rule 511.164 is needed around the “board *may accept* not more than six hour or quarter hour equivalents upper-level CPA review coursework...” (emphasis added). The “may accept” language is unclear as to when the Board would and would not accept CPA review courses and what the standards are for accepting CPA review courses. The “may allow” standard raises many questions such as: What schools are approved and what schools are not approved to offer CPA review courses? How is the approval determined and what standards are utilized? Are there schools that have CPA review courses but are not Board-approved to offer them to students for credit?

Internships

As has become evident and clear in recent years surrounding the national discussion about the CPA pipeline, internships and work experience are extremely valuable real-life learning experiences that can benefit candidates.

The proposed rules for the additional pathway to licensure do not contemplate that internships are included in the educational component for licensure under the bachelor's pathway. TXCPA strongly recommends that three credit hours of accounting or business internship should be included in the upper-level business coursework under the new bachelor's pathway.

The current rules of the UAA contemplate that accounting and business internships are a critical component to the educational requirement to become a licensed CPA.

(<https://nasba.org/app/uploads/2018/02/UAA-Model-Rules—January-2018.pdf>) TXCPA urges the State Board to include an internship component in the business hours.

§513.11 Qualifications for Non-CPA Owners of Firm License Holders

Proposed Rule 513.11 changes the requirements that are attendant to Texas resident non-CPA firm owners. TXCPA does not have an issue with the changes in this proposed rule.

However, one critical issue needs to be addressed. The preamble to proposed rule 513.11 states that “The Board is proposing a revision to §513.11 to make it clear that a non-CPA firm owner must be a Texas resident. This is a statutory requirement.”

TXCPA believes that this preamble mischaracterizes Section 901.355, Texas Occupations Code, and mischaracterizes what is proposed in Rule 513.11. Neither the law nor the rules require non-CPAs to be Texas residents. The law and the rule contemplate that those who are Texas residents must meet certain requirements.

The mischaracterization of the preamble is causing significant confusion with CPA firms that are registered in Texas. Many regional and national firms may not think that their non-CPA owners must be Texas residents, which is clearly not the case. The preamble to proposed Rule 513.11 needs to be clarified to ensure that firms are not out of compliance or making compliance errors.

TXCPA urges the State Board to clear up the ambiguity between the preamble and the proposed Rule 513.11. In addition, the State Board should consider providing an update on the website, if the rules are adopted, that clearly sets out the licensing requirements for firms with non-CPA owners.

§ Rule 523.113 Exemptions from CPE

Proposed Rule 523.113 provides an exemption from CPE requirements for faculty members of an educational institution only when offering accounting services as a faculty member.

TXCPA is opposed to this exemption and urges the State Board to remove this exemption. Accounting professors are on the front lines of the CPA profession, and it is incumbent on accounting faculty and accounting programs to ensure that well-qualified individuals teach the next generation of CPAs. CPE provides enormous value to licensees, from being up to date on current laws, rules, and regulations, to learning about current trends and innovations in the profession, to providing a refresher in certain areas and disciplines. Removing the CPE

requirement for accounting faculty seems short-sighted and a diminution of the standards for teaching accounting.

Work Experience Requirement

Senate Bill 262 requires that the additional pathway to licensure include a two-year work requirement. The State Board has not yet reviewed the requirements associated with the two-year work requirement.

TXCPA strongly recommends that the State Board quickly convene meetings with practitioners, candidates, and others to learn more about what the two-year work requirement should look like under the additional pathway set out in SB 262. TXCPA recommends that the State Board explore what is happening in other states relating to the expansion of work experience to two years to determine best practices and current thinking. Achieving some consistency with other states around work experience will be beneficial to candidates and practitioners. Careful attention and consideration should be focused on what prior relevant work experience can be used to meet the two-year work requirement, the timeframe within which the two-year work requirements can be completed, what supervision is required, and how the two-year work requirement can be addressed for those students who are in the transition period and wanting to become licensed under the new additional bachelor's pathway.

In developing these future requirements, TXCPA urges the Board to align as closely as possible with UAA best practices, while providing flexibility for candidates whose relevant experience may include part-time work, government service, internships, or teaching assistantships. Without clear and flexible standards, Texas risks creating inconsistencies that could disadvantage both candidates and employers.

TSBPA Rules Process

TXCPA has concerns about the rules process undertaken by TSBPA. Rules are an important aspect of legislative implementation. When large profession-changing legislation is passed, the rules process is even more significant. While it is admirable that the State Board wants to adopt rules as soon as possible to give higher education sufficient time to implement new educational requirements, the process to get to where we are has been disjointed at best.

First, the proposed rules that were first addressed by the Qualifications Committee were not publicly available on the website or through the links associated with the agenda/meeting materials. Significant efforts had to be made to obtain copies of the draft rules to be prepared to understand and follow what was going to be discussed at the Qualifications Committee meetings. While TXCPA has the resources to track down draft rules, the public often does not have the ability to access those draft rules. Without being able to see the draft rules, public participation is extremely limited and difficult. We recommend that the State Board make all draft rules available on the website for the public to view so that public participation becomes a valuable exercise. Additionally, as all meetings now have a virtual option, we recommend that any rules that are discussed, especially in the Qualifications and Rules Committees meetings, be shown

(shared screen) virtually so that the public can follow what rules are being discussed and what changes are being considered. Without access to the draft rules or without the ability to see what is being discussed, the meetings are extremely difficult to follow.

Second, TXCPA strongly recommends that the State Board and the relevant committees consider creating an informal rules stakeholder group (comprised of educators, practitioners, TXCPA, and other interested parties) that can help the State Board, committees, and agency staff draft rules. It has been TXCPA's experience in working with other state agencies that many agencies create informal stakeholder groups to help the agency and staff draft rules, consider issues, raise concerns, and provide an opportunity to understand how the proposed rules might work in practice. This process of pre-vetting draft rules helps to provide more transparency in the rules drafting process.

As rules are moved forward to the committee stage, the committee can always make additional changes to the draft rules, but the committee meeting process will run much smoother and the public and interested parties will have a better participation experience. An informal stakeholder group does not need specific statutory authorization but is just a group formed by the relevant state agency to assist in rules drafting. The same public hearings and comment period laws and rules remain in effect for the adoption of the rules.

Conclusion

TXCPA commends the State Board and Board staff for their work on the proposed rules. TXCPA strongly recommends that the State Board and staff take another look at the rules to make sure that there is clarity and consistency throughout. There are many rules that are difficult to read and understand, both proposed and existing rules, and clarity and simplicity should be paramount. Students, educators, advisors, and practitioners all need to be able to easily understand the rules and be able to explain them without difficulty. Lack of clarity is an unnecessary burden that can slow down the candidate's experience.

Sincerely,



Billy Kelley, CPA, TXCPA Chair



Jodi Ann Ray, CAE, TXCPA President and CEO



Kenneth Besserman, JD, TXCPA Director, Government Affairs and Special Counsel

August 20, 2025

J. Randel Hill, General Counsel
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RE: Title 22, Chapter 511 Proposed Amendments to Educational Qualifications

Thank you for the opportunity to provide feedback on the proposed changes to the educational qualifications under the Public Accountancy Act to take the Uniform Certified Public Accountant Examination. I am a licensed CPA in the State of Texas, and I worked in public accounting for nearly 30 years before transitioning to academia. I have been a full-time accounting faculty member at Trinity University for eleven years.

Below, I provide comments regarding proposed changes to Rule 511.58 and suggest a change to Rule 511.56 to add clarity and reduce confusion regarding the education requirements during the transition period for candidates who began the process prior to the adoption of the 120-semester credit hour pathway to certification.

Comments related to Rule 511.58:

- Rule 511.58 (b) - **I support** the proposed change to no fewer than 21 credit hours of upper-level business courses (down from 24).
 - Prior to the introduction of the new pathway, many universities, such as Trinity University, offered upper-level courses within their master's programs, allowing students to meet the business course requirements within 150 hours. The change to 120 hours for eligibility to sit for the CPA exam forced curricular changes to move courses to the undergraduate degree program. In order for students to graduate on time, this proposed change to 21 credit hours of upper-level business courses alleviates some pressure on academic programs. The reduction in business courses by 3 credit hours, as proposed, does not harm students' ability to pass the CPA exam and begin successful careers in accounting.
- Rule 511.58 (b) (items 8 and 9) - **I do not support** reducing finance and data analytics credit hours to no more than 6 credits.

- This change would not align with the underlying motivation that led to the CPA Exam Evolution. There is a continued growth in the importance of data analytics in the profession, which is increasing with advances in technology. The CPA Exam changes included an increased emphasis on finance, acknowledging the importance of this discipline for accounting professionals. The change to increase data analytics and finance credits to no more than 9 credits took effect January 1, 2024, and the importance of students taking additional courses in these areas has not diminished. In fact, advances in technology, including artificial intelligence and advanced analytics, have only increased the need for future accountants to be knowledgeable in the areas of finance and data analytics. Students who complete 9 credits in upper-level data analytics and finance courses are more prepared for success in their careers. A reduction in the credit hours allowed for these disciplines could be detrimental to students who might be forced to take other business courses to meet eligibility requirements and graduate on time.
- Rule 511.58 (b) (item 10) - **I support** the proposed change to allow up to 6 credit hours of upper-level business or accounting internships to meet the requirements to fulfill a portion of the 21 credit hours of upper-level business courses.
 - Prior research finds that students completing internships perform better on the CPA exam than students who do not have an internship opportunity ([Hairston, Harter, & McKay 2020](#)). In addition, experiential learning has a positive impact on students' self-efficacy and expectations of becoming a CPA ([Lankton, Thompson-Abbott, & Nash 2024](#)). Many other states allow internship credits to count toward eligibility to sit for the CPA exam, and evidence validates this practice.

Suggestion related to Rule 511.56:

- Rule 511.56 (e) - Suggestion to improve clarity of the language in Rule 511.56.
 - The proposed changes include the omission of the following phrase in part (a), "at the time of filing the initial application to take the examination and". However, part (e) also includes similar language (i.e., at the time of taking the initial examination), which can be confusing and should also be omitted. It would reduce confusion if part (e) were more straightforward in stating that the applicant can choose to adopt the current education requirements of the Act.

The TXBPA is to be commended for its time and efforts to ensure that CPA Candidates in the State of Texas have the opportunity to succeed in passing the CPA exam by upholding rigorous standards for education. Thank you for the opportunity to provide feedback in this process.

Sincerely,



Amy Foshee Holmes



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August 19, 2025

J. Randel Hill, General Counsel
Texas State Board of Public Accountancy
505 E. Huntland Drive, Suite 380
Austin, TX 78752-3757

Dear Mr. Hill,

Thank you for the opportunity to provide feedback on the Texas State Board of Public Accountancy's proposed rules and amendments regarding eligibility to sit for the Uniform Certified Public Accountant Exam (UCPAE) and CPA licensure through alternative pathways in Texas. As accounting professionals and faculty members at Trinity University, we appreciate the TSBPA's crucial role in upholding the integrity, professionalism and public trust within the accounting profession. We commend the TSBPA's dedication to maintaining high standards while responding to the evolving needs of both the profession and the public. Below, we offer our comments organized by each proposed rule.

22 TAC §511.56 – Educational Qualifications under the Act to take the UCPAE

In proposed §511.56(a)(2)(B) and §511.56 (a)(2)(C), we support both the hours required for upper level accounting courses (24 credit hours) and upper level related business courses (21 credit hours) as defined by §511.57 of the proposed rules. The revisions ensure parity for students who select either the 120-hour and 150-hour pathway for eligibility for the UCPAE, without placing additional burdens on baccalaureate accounting programs.

The revisions to §511.56(a) remove the phrase "at the time of filing the initial application to take the examination and". However, §511.56(e) contains the deleted wording ("at the time of taking the initial examination") which may cause confusion. Aligning the language in these sections and explicitly stating that the applicant may choose to adopt the current education requirements would help eliminate confusion. Additionally, the TSBPA should consider including language that clarifies any potential consequences for candidates who decide to change the education requirements under which they are applying.

22 TAC §511.57 – Qualified Accounting Courses to take the UCPAE

We support all proposed revisions to this section. As noted above, these revisions ensure parity for students who select either the 120-hour and 150-hour pathway for eligibility for the UCPAE, without placing additional burdens on baccalaureate accounting programs.

22 TAC §511.58 – Definitions of Related Business Subjects to take the UCPAE

In §511.58(b), we support the proposed rule requiring no fewer than 21 credit hours (reduced from 24 credit hours) of upper level related business courses. This requirement allows for economics and statistics courses to be allowable at any college level provided they are completed at a recognized educational institution and documented on official transcripts toward a baccalaureate degree or its equivalent.

In §511.58(b), we **do not** support the limitation of six hours of the courses listed in §511.58(b)(8) – *finance and financial planning* and §511.58(b)(9) – *data analytics, data interrogation techniques, cyber security and/or digital acumen in the accounting context*. This change is inconsistent with the objectives of CPA Exam Evolution, which recognized the growing importance of data analytics, technological advancements and the heightened emphasis on finance. The January 1, 2024 rule changes allowing up to nine credit hours in these subjects was a deliberate step to strengthen candidates' competencies. The necessity for students to pursue additional coursework in these areas continues to increase in importance as the accounting profession evolves.

In §511.58(b)(10), we enthusiastically support allowing up to six credit hours of upper level business or accounting internships to count toward the 21 credit hour upper level related business course requirement. Research shows that students who complete internships perform better on the CPA exam than those without internship experience (Hairston, Harter, & McKay, 2020¹). Experiential learning also boosts students' self-efficacy and strengthens their commitment to becoming CPAs (Lankton, Thompson-Abbott, & Nash, 2024²). Many other states currently (and historically Texas) permit internship credit hours to count toward UCPAE eligibility.

22 TAC §511.59. Qualifications for Issuance of a Certificate with not Fewer than 120 Semester Hours

In §511.59(b)(1), we cautiously support the requirement that additional upper level accounting courses must total at least 27 credit hours. The 27 credit hour requirement for licensure could place extra strain on baccalaureate accounting programs to offer these hours within their curricula, rather than necessitating candidates to complete the additional three credit hours independently. Many baccalaureate accounting programs may not have the capacity to provide these additional accounting credits to their students. If students feel they cannot complete the

¹ Hairston, Harter & McKay (2020). Bridging the CPA Exam Gap: Do Internships Matter? *American Journal of Business Education*, Volume 13 Number 1.

² Lankton, Thompson-Abbott, & Nash (2024). Effects of Experiential Learning on Intention to Become a CPA, *Accounting Education*.

required number of credit hours for licensure within their baccalaureate accounting program, they may choose to pursue a different major, potentially leading to the unintended consequence of a reduced number of candidates entering the accounting profession.

We support the requirements of §511.59(b)(2)(A), §511.59(b)(2)(B), §511.59(b)(2)(C) §511.59(c).

22 TAC §511.164. Qualification for Issuance of a Certificate with not Fewer than 150 Semester Hours

We support the requirements of this section, with the exception of the referenced provisions therein, for which our comments have been provided above.

22 TAC §512.1. Certification as a Certified Public Accountant by Reciprocity

We support the revisions to this section because they provide clarity and make it easier for CPAs to practice in Texas, as well as for the Texas CPA designation to be recognized in other states.

22 TAC §512.4. Application for Certification by Reciprocity

We support the revisions to this section because they provide clarity and make it easier for CPAs to practice in Texas, as well as for the Texas CPA designation to be recognized in other states.

We do not have any substantive comments on sections not referenced herein.

We appreciate the opportunity to provide feedback and commend your efforts to be proactive in maintaining a strong pipeline of CPAs. We look forward to continued collaboration and welcome any opportunity for dialogue as the profession evolves. Should you have any questions regarding our comments, please feel free to reach out to us.

Thank you for your consideration.

Julie Persellin

Julie Persellin, Ph.D.
Department Chair
Accounting

Sunita White

Sunita White, CPA
Brown Professor of Professional Practice in Accounting
Director of the MSA Program



August 25, 2025

J. Randel Hill, General Counsel
Texas State Board of Public Accountancy
505 E. Huntland Dr., Suite 380
Austin, Texas 78752

Via facsimile (512) 305-7854

Public Comment on Proposed Regulations

We appreciate the Texas State Board of Public Accountancy efforts to implement Senate Bill 262, which establishes a third Certified Public Accountant licensure pathway. We genuinely believe that the passage of this bill will be of benefit to the accounting profession. Our commentary weighs heaviest on the potential disadvantages imposed on candidates during the transition period.

We respectfully submit the following concerns regarding the proposed regulations that we believe warrant reconsideration or clarification: §511.56 (Application of Intent), §511.59 (Qualifications for Issuance of a Certificate with not Fewer than 120 Semester Hours), and §511.164 (Qualifications for Issuance of a Certificate with at least 150 Semester Hours).

1. Application of Intent (AOI) – Timing of Submission

Under the proposed rules, any candidate who chooses the new pathway must delay filing an Application of Intent until after August 1, 2026, when the new standard takes effect. This effectively forces a 12-month "hold" on candidates otherwise ready to begin taking the UCPAE, or else they must proceed under the current (and potentially more onerous) requirements. Our firm alone has at least 5 candidates affected by this "hold." This represents 4.2% of our employees and 21% of our CPA Candidates.

Further, this regulation conflicts with prior efforts of the Experience, Learn, Earn (ELE) program. Many of our candidates initiated their Application of Intent under the rules that allow a candidate to submit their AOI with 120 hours. The candidates planned to take the CPA exam and complete the education requirements through ELE after passing the CPA exams. With these candidates having an AOI submitted, they cannot benefit from the new

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pathway and must obtain as many as 30 additional credits for licensure. The applicants would have the option to allow the AOI to expire after the 2-year period and resubmit after August 1, 2026. This puts these applicants at risk of losing credit for exams already passed and once again delays the process for licensure. This affects 3 additional employees at our firm.

Overall, these provisions negatively impact a total of 8 candidates, which equates to 34% of CPA candidates at our firm alone.

The proposed regulations create a significant financial burden for the candidates that have begun the CPA exam process through CPA review materials, opportunity cost, tuition for additional courses and delayed salary impacts. Additionally, there is a negative impact on the profession and our firm by delaying the licensing of this group of Certified Public Accountant candidates, as well as providing additional attrition risk to the profession.

We recommend the regulations be revised to allow candidates to become licensed via the 3rd Pathway regulations after August 1, 2026 if the education requirements determined to uphold the integrity of the Certified Public Accountant license are met. The date of filing the Application of Intent should not determine licensure.

2. Educational Standards for Various Pathways - Transition Period

The proposed §511.59(b)(1) requires that, effective August 1, 2026, a 120-hour pathway candidate must complete:

"...additional upper-level accounting courses as defined by §511.57 ... equals or exceeds 27 semester hours or quarter-hour equivalents of upper-level accounting courses."

This matches the upper-level accounting requirement in the proposed §511.164 for the 150-hour pathway prior to July 31, 2026, but the 150-hour post August 1, 2026 requires 30 semester hours of upper-level accounting courses.

Candidates who began under the prior 150-hour framework may now find their coursework insufficient, even though it met prior rules. Our firm alone has 10 candidates that meet the current 150-hour requirement and have sufficient upper-level accounting and business courses. These candidates have begun testing or studying for the CPA exam, but do not anticipate completing all necessary requirements prior to August 1, 2026. The proposed regulations could negatively impact these candidates due to the increase in required upper-level accounting courses, including associated tuition, fees, scheduling delays and time to complete. We understand that the proposed regulations grant additional opportunities allowing 6 hours of review courses to apply to this provision (§511.164 (a)(5)), but the candidates negatively affected did not take university review courses and are no longer enrolled in a program to utilize this opportunity.

Adding these 10 candidates, the proposed regulations potentially affect another 42% of the candidates within our firm.

We recommend the regulations be revised to include a grandfather clause that would recognize coursework completed under the pre-August 1, 2026 150-hour standard as valid for licensure.

3. Availability to Elect the 120-hour Pathway

In the event a non-accounting major decides to pursue their CPA license, this could deter those candidates, rather than promote licensure within the industry, and cause additional attrition issues.

Our recommendation would be to allow candidates over 150-hours to elect to utilize the new pathway should they choose.

Recommended Alternatives

SB 262 was intended to *expand* the CPA pipeline. As drafted, these requirements risk creating additional barriers to entry during the transition period. As you can see above, 75% of the candidates at our firm are potentially negatively affected during the transition period. To balance the Board's quality standards with the profession's need for accessible pathways we are recommending the following:

1. **Application of Intent Flexibility** – Allow candidates to file now, with the option to “activate” under the new pathway when it becomes effective, rather than forcing a year-long wait. Modify §511.59(a) to remove the word “initial” from the final regulations, preserving the intended benefit of this alternative for all candidates.
2. **Grandfathering Provision** – Recognize coursework completed under the pre-August 1, 2026 150-hour standard as valid for licensure under the new rules.
3. **Pathway Choice** – Allow all candidates the ability to choose the pathway that best fits their ability to become a Certified Public Accountant most efficiently, regardless of the number of college credit hours they have accumulated.

Conclusion

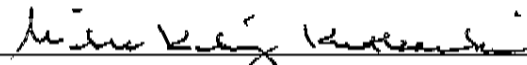
Our firm supports the Board's commitment to maintaining the quality and integrity of the Certified Public Accountant designation. However, the current proposed rules in §511.56,

§511.59, and §511.164—particularly the Application of Intent hold, the convergence of upper-level course requirements, and the lack of transitional accommodations—risk imposing significant, unnecessary costs on candidates and employers. We respectfully urge the Board to consider revisions that preserve the accessibility and intent of SB 262 while ensuring the continued strength of the Texas CPA profession.

Thank you for your consideration.

SEIDEL SCHROEDER

By: _____


Michele Kohring Kwiatkowski, CPA

1. **Comment:** One commenter stated that the intent of SB 262 89 (R) 2025 was to establish an additional pathway for persons wishing to become a Certified Public Accountant without having to obtain 150 semester hours of course work. They stated it was not the bill's intent to increase course hours needed for certification.

Response: The revisions do not increase the number of hours required for certification. The Board is maintaining, pursuant to Board Rule 511.59, a total of 27 hours in upper level accounting courses for those individuals seeking certification with a baccalaureate degree and two years of work experience. The authority for the courses is found in section 901.254 (2) of the Texas Public Accountancy Act. The Act states that the applicant must have "at least 24 semester hours of accounting or equivalent courses as determined by board rule" (emphasis added). Since the statute requires at least 24 semester hours the "at least" language permits the Board to maintain the hours as these rule revisions propose. The change the Board has made in these rule revisions simply eliminates 3 hours of the currently required business course hours in exchange for an equal number of hours of upper level accounting courses. By relocating the 3-hour ethics course to the business coursework the Board maintains the 24 hours requirement. The Board believes that substituting upper level accounting hours (aka accounting concentration) will better prepare the applicant to pass the CPA examine. This adjustment to the Board's existing rules was initiated by comments from accounting educators from various higher education institutions during public meetings of the Qualifications committee.

2. **Comment:** An additional comment suggested that the Board ensure that its rules be easily understood, easy to follow, simple to explain to candidates and do not include unnecessary burdens to licensees.

Response: The Board welcomes all actionable feedback that may help to clarify its rules and to eliminate rules that are difficult to understand or rules that create unnecessary obstacles to certification.

3. **Comment:** A commenter made the point of the need for the Board's rules to be consistent with the Uniform Accountancy Act (UAA) in order to maintain national

unity and hope that the Board's rules not materially diverge from other states. The commenter stated that material deviations could jeopardize license portability and reciprocity.

Response: The Board will continue to monitor any revisions made to the UAA to address the new pathway to certification.

4. Comment: Commenter reiterated their concern regarding an increase in course work required for applicants wishing to be certified with a baccalaureate and two years of experience. Commenter cited a link to the UAA Model Rules which only requires a minimum of 24 hours of course work to be certified to support their position.

Response: Consistency among the states is a valid concern. As previously stated the Board will continue to monitor any revisions made to the UAA and its Model Rules. Consistent with the UAA Model Rules the Board has reallocated the ethics course work as an acceptable business course.

5. Comment: Commenter suggests that a baccalaureate candidate for certification should not be required to have the same amount of accounting hours as an applicant with 150 hours of coursework. Once the applicant passes the exam additional accounting should not be required.

Response: The Board is of the opinion that schooling should not be geared primarily to passing the exam. The formal education of accounting coursework is primarily intended to prepare the applicant for certification to meet the needs of the public. The public is best served when certificate holders, regardless of their pathway to licensure, have received an equal number of accounting course work hours. The Board does not believe one 3-hour accounting class will create a significant hardship to the accounting student which is offset in other areas.

6. Comment: Commenter suggests that the approved and accredited institutions of higher education determine which courses best fill the needs of a

student wishing to become a CPA. Higher education institutions may be in the best position to provide guidance in coursework. Commenter suggests the Board not dictate the coursework.

Response: The coursework of study provided for in the Board's rules track the UAA and Model Rules created by NASBA and the AICPA. The Board is in agreement that there is value in the states being aligned in the educational requirements to be certified, particularly if a Texas licensee were to attempt to become certified in other states. It is within the board's responsibility to establish educational standards that schools may use in creating a plan and advising students of coursework needed to prepare to meet the demands of the public as well as to be successful to pass the CPA exam.

7. Comment: Commenter advises that ethics training need not be included in the upper-level accounting coursework but could be added outside the higher education curriculum. Although ethics is certainly important, commenter would rather see the coursework in the higher education system devoted to accounting. Commenter believes that mandating accounting beyond a bachelor's degree is not permitted under SB 262.

Response: Dr. C. William Thomas, Professor of Accounting, and Kathy Hurt, Assistant Professor of Accounting at Baylor University conducted a survey in 2010 to determine the effect of the Board mandating a 3-hour ethics course as a part of an accounting degree program to become certified. What they found was that during the five-year period that was studied, from 2005 to 2010, disciplinary actions by the Board against licensees went down. They concluded the 3-hour ethics coursework as a part of the accounting degree program was effective. It was also recommended by the Office of the Governor as a result of the Arthur Andersen/Enron failure. The Board continues to believe the mandated 3-hour ethics coursework to be effective and that SB 262 does not preclude the Board from continuing the requirement. In addition, the ethics course is not part of upper level accounting but is reallocated in the business hours. See comment no 1.

8. Comment: Commenter recommends that the Board not reduce the requirement of 3 hours of business coursework from the curriculum to become certified in rule 511.58. Commenter maintains that the number of business hours would better prepare the applicant for certification to be well rounded professionals.

Response: The Board agrees that being a well-rounded professional to be very important and business coursework is one method of achieving that goal. The Board recognizes, however, that the primary goal of the applicant is to obtain competence in accounting. The Board believes that replacing the 3-hour business coursework with 3 hours of accounting coursework places greater emphasis on the objective of producing competence in accounting. The pass rate of the CPA exam suggests a need to address accounting coursework.

9. Comment: More than one commenter recommended that the Board's rules permit applicants, who have already submitted their application of intent to become certified, be permitted to have the option of moving to the new pathway for certification when the new law takes effect on August 1, 2026. They recommend that these applicants be permitted to be certified with a baccalaureate degree plus 2 years of accounting related work experience.

Response: The Board is in agreement that applicants who submitted their application of intent prior to the effective date of the new law, August 1, 2026, be permitted to seek certification with a baccalaureate degree and 2 years of experience by electing to come under the provisions of the August 1, 2026 provisions of the Act. The Board agrees with that recommendation and has revised the 511.56 rules to make it clear that those applicants may make an election to complete the requirements for certification under the new pathway.

10. Comment: Commenter suggests that Board Rule 511.164 is unclear as to whether a CPA review course will count toward upper level accounting courses or business courses for purposes of certification.

Response: The Board appreciated the concern in the comment and added language to rule 511.164 to make it clear that if an accredited institution of higher education accepted by the Board has offered and given credit to the review course then the Board will accept that review course for purposes of qualifying for certification.

11. Comment: Commenter suggests that language is needed to make it clear that internships are included in the educational component to certification under the bachelor's pathway.

Response: The Board will recognize up to 6 hours credit given for an internship in board rule 511.58 as a business course when offered by an accredited institution of higher education, toward the credit needed to sit for the Uniform CPA exam.

12. Comment: A comment was made regarding the preamble to the proposed revision to Board rule 513.11. The preamble reads that the non-CPA firm owner must be a Texas resident. That is not a correct statement and the preamble should be corrected.

Response: The comment made in the proposed rule preamble is not correct. You do not have to be a Texas resident to be a non-CPA firm owner. What the preamble should have stated was that non-CPA firm owners who are Texas residents must comply with the qualifications listed in the rule.

13. Comment: A comment on Rule 523.113 was made opposing language which exempts a faculty member of an institution of higher education from CPE requirements when their only association with accounting is as a faculty member.

Response: The Board does not disagree with the commenter's position. Section 901.003(c)(2) of the Texas Public Accountancy Act provides, however, that a faculty member of an educational institution is not in the practice of public accountancy upon making a representation as a faculty member solely in connection

with the duties of the person as a faculty member. So long as that representation is made only as a faculty member they are not in the practice of public accountancy and are not subject to this agency's CPE regulation.

14. Comment: Two separate comments were received that recommended that the Board not reduce the number of credit hours accepted in finance and data analytics to no more than 6 credits. Commenters pointed out that there is continued growth in the importance of data analytics as well as finance with the increasing advances in technology.

Response: The Board agreed with the comments and revised board rule 511.58 to remove the maximum of 6 hours of related business subjects.

15. Comment: The Board proposed to eliminate the phrase “at the time of filing the initial application to take the examination and”... “and at the time of taking the initial examination” in paragraphs (a) and (e) of Board rule 511.56. Two separate commenters suggested that the omission of the two phrases create some confusion and one suggestion was that if (e) would read “the applicant can choose to adopt the current education requirements of the Act” that may help to clarify the rule’s intent.

Response: The board agreed with the comments and revised Board rule 511.56 to permit an applicant to elect to come under the provisions of the August 1, 2026 provisions of the Act for certification with a baccalaureate degree and two years of accounting experience.

16. Comment: A comment was received that suggested the Board include language in 511.56 that clarifies any potential consequences for applicants who decide to change the education requirements should they choose, to reapply for certification pursuant to the baccalaureate degree plus 2 years of experience.

Response: See the response immediately above. The Board removed the word “initial” in 511.56 to permit the applicant to elect to come under the provisions

of the August 1, 2026 provisions of the Act for certification with a baccalaureate degree.

Agenda Item V(a)
Rules Committee Agenda
September 17, 2025
1:45 p.m.

- B. Schedule next meeting.