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September 30, 2022

Board of Examiners  
American Institute of Certified Public Accountants  
1345 Avenue of the Americas, 27th Floor  
New York, NY 10019

Via Email to [practiceanalysis@aicpa.org](mailto:practiceanalysis@aicpa.org)

***Re: Exposure Draft, Maintaining the Relevance of the Uniform CPA Examination – Aligning the Exam with the CPA Evolution Licensure Model***

Dear Board members and staff:

Grant Thornton LLP (Grant Thornton or we) appreciates the opportunity to comment on the AICPA Board of Examiners' "Maintaining the Relevance of the Uniform CPA Examination – Aligning the Exam with the CPA Evolution Licensure Model." Grant Thornton is the US member firm of Grant Thornton International Ltd., one of the world's leading organizations of independent audit, tax, and advisory firms. We have over 8,500 personnel and operate over 50 offices across the United States.

We fully agree that the evolution of the CPA Exam is necessary to remain relevant in today's dynamic business environment. We further agree that the necessary skillset for a newly licensed CPA (nICPA) is not only changing but expanding. This may present challenges with regard to exam content given the breadth of possible subject matter.

We generally support the direction of the proposed changes resulting from the findings of the Practice Analysis (PA) described in the exposure draft. However, we believe additional messaging is needed with regard to (a) how the new discipline section will translate into the profession and (b) whether and how employers should consider the new format in their hiring decisions or mentoring of graduates that are eligible to sit for the CPA Exam.

We respectfully submit our comments and recommendations for the Board's consideration.

### **Exam structure**

We support the creation of three core exam sections with a fourth section focused on discipline-specific content. We also support the topics initially selected: business analysis and reporting (BAR), information systems and controls (ISC), and tax compliance and planning (TCP). Further, we found the transition policy easy to understand and support its implementation in January 2024.

It would be helpful to better understand the Board's intention for the discipline sections going forward. As noted in our introductory remarks, the profession is evolving at a rapid pace. It was unclear to us in the exposure draft whether the Board intends to add additional discipline sections in the future. For example, ESG attestation is growing, and it requires a unique set of skills by individuals who are familiar with (a) attestation standards, (b) the specific subject matter of ESG, and (c) the criteria commonly used in these engagements. It is possible that nCPAs will have a growing role in these engagements in order to provide appropriate professional development as firms grow their ESG attestation practices.

### **Exam content and blueprints**

We agree with the new exam content identified by the PA. Such topics align with the expectations we have for nCPAs who join our firm. We also believe the new topics will be implemented into the relevant exam sections in a sufficient and meaningful way based on our review of the blueprints. We have no specific recommendations or suggested revisions on the blueprints.

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We would be pleased to discuss our comments with you. If you have any questions, please contact Jennifer Cavanaugh, Chief Auditor, at (312) 602-8715 or [Jennifer.Cavanaugh@us.gt.com](mailto:Jennifer.Cavanaugh@us.gt.com).

Sincerely,

/s/ Grant Thornton LLP