

A=Action

SOUTH DAKOTA BOARD OF ACCOUNTANCY

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Agenda South Dakota Board of Accountancy Meeting Conference Call 9:00 a.m. (CT) October 19, 2010

D=Discussion I=Information	Page
A-Approval of Minutes of Meeting September 22, 2010	1-2
A-Approval of Certificates & Firm Permits	3-4
A-Financial Statements through September 30, 2010	5-14
A-Request for CPE Extension.	15
D-Report on Statistics from Online Renewal for FY11	16-17
D-Report to Board on Expired Licensees.	18-22
AICPA	
D-Meeting Highlights October 1-2, 2010	23-24
NASBA	
D-Blue Ribbon Panel Update	25-28
EXECUTIVE SESSION Equivalent Reviews for Board Approval	Spt. Pkt
FUTURE MEETING DATES (all times CT)	

December 3 – 9:00 Conference Call



SOUTH DAKOTA BOARD OF ACCOUNTANCY

301 E. 14th Street, Suite 200
Sioux Falls, SD 57104
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www.state.sd.us/dol/boards/accountancy
South Dakota Board of Accountancy
Minutes of Meeting
Conference Call
9:00 a.m. (CT)
September 22, 2010

The Board of Accountancy held a meeting by conference call on Wednesday, September 22, 2010. Chair Holly Brunick called the meeting to order at 9:15 a.m.

A roll call was taken to confirm that the following members were present: Holly Brunick, Marty Guindon, John Linn, Jr., John Mitchell, David Olson, and John Peterson. A quorum was present.

Also present were Sherri Sundem Wald, Legal Counsel; Nicole Kasin, Executive Director; Tricia Nussbaum, Secretary; and Todd Kolden, Department of Labor.

Chair Holly Brunick asked if there were any additions to the agenda. There were no additions.

A motion was made by John Peterson and seconded by Marty Guindon to approve the August 19, 2010 meeting minutes. A roll call vote was taken. The motion unanimously carried.

A motion was made by David Olson and seconded by John Linn, Jr. to approve the issuance of individual certificates and firm permits through September 15, 2010. A roll call vote was taken. The motion unanimously carried.

A motion was made by John Linn, Jr. and seconded by John Peterson to approve the financial statements through August 31, 2010. A roll call vote was taken. The motion unanimously carried.

Marty Guindon gave an overview of information to the Board regarding the licensee request for peer review. The Board discussed at great length the issues presented in the letter. In accordance with ARSD 20:75:05:07 and SDCL 36-20B-61 the licensee would be required to have a peer review. Executive Director Kasin will draft a letter including the referenced rules and laws and state that based on the facts provided and the Board's interpretation a peer review is required.

The Board discussed possible statute changes for the upcoming 2011 legislative session. The Board decided not to pursue any changes to the statutes the 2011 legislative session. Furthermore, the Board will review the statutes and email Executive Director Kasin with all suggestions for changes to be addressed in the 2012 legislative session.

The Board discussed the AICPA's Testimony to IRS on Reg-139343-08 including user fees and PTIN.

The Board was informed of the AICPA Setting Passing Scores on the CPA Exam.

The Board completed NASBA's Regional Director's Focus Questions.

The Board briefly discussed the NASBA Candidate Care Report 2nd Quarter 2010 and the CPA Exam Quarterly Report 2ne Quarter 2010.

The Board reviewed the letter to the Selection Advisory Committee from North Carolina. The topic of the letter had been discussed in length at the meeting in August with Regional Director Ted Lodden. After much more discussion, the Board decided to concur with Tennessee and North Carolina and also send a letter to the Chair of the Selection Advisory Committee.

A motion was made by John Peterson and seconded by John Mitchell to send a letter agreeing with the boards from Tennessee and North Carolina that the future CEO for NASBA must be a CPA. A roll call vote was taken. The motion unanimously carried. Executive Director Kasin will draft the letter and Chair Brunick will sign it.

The Board discussed the proposed changes to NASBA's Bylaws.

A motion was made by John Peterson and seconded by John Mitchell to designate Chair Brunick as voting delegate at NASBA's Annual Meeting in October. A roll call vote was taken. The motion unanimously carried.

A motion was made by David Olson and seconded by John Linn, Jr. to enter into executive session for the purpose of discussing peer reviews. A roll call vote was taken. The motion unanimously carried.

The Board came out of executive session.

A motion was made by Marty Guindon and seconded by John Mitchell to accept the peer reviews as discussed in executive session. A roll call vote was taken. The motion unanimously carried.

Future meeting dates were discussed and set as follows (in CDT): October 19 – 9:00 a.m. Conference Call December 3 – 9:00 a.m. Conference Call

A motion was made by John Mitchell and seconded by Marty Guindon to adjourn the meeting. A roll call vote was taken. The motion unanimously carried.

All business having come before the board was concluded and Chair Holly Brunick adjourned the meeting at 10:47 a.m.

Holly Bruni	ck, CPA, Chair
Attest:	
Nicole Kasin, Executive Director	John Peterson, Sec/Treasurer

CERTIFIED PUBLIC ACCOUNTANT CERTIFICATES BOARD COPY

Issued Through October 12, 2010

Number	Name	Date Issued	Location
2949	Brian Bradley Woldt	9/27/10	Sioux Falls, SD
2950	Dave John Yuhas	9/28/10	Rapid City, SD
2951	Sara Ann Brainard	9/30/10	Rapid City, SD
2952	Brandon Wade Eberhard	9/30/10	Sioux Falls, SD
2953	Elizabeth Ann Broders	10/04/10	Sioux Falls, SD
2954	Melissa Beth Christianson	10/12/10	Madison, SD

FIRM PERMITS TO PRACTICE PUBLIC ACCOUNTANCY BOARD COPY

Issued Through October 12, 2010

Number	Name	Date Issued	Basis/Comments
1498	Davie Kaplan, CPA, PC Rochester, NY	10/7/10	New Firm
1499	Piercy, Bowler, Taylor & Kern, CPAs Las Vegas, NV	10/12/10	New Firm

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STATE OF SOUTH DAKOTA	CHURCH CHICAGO CONT.
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CASH CENTER BALANCES AS OF: 09/30/2010 AGENCY: 10 LABOR BUDGET UNIT: 1031 BOARD OF ACCOUNTANCY

BOARD OF ACCOUNTANCY CENTER DESCRIPTION 399,143.95 DR *** 399,143.95 DR ** DR/CR 399,143.95 DR * 399,143.95 DR BALANCE ACCOUNT 6503 103100061802 1140000 COMP/BUDG UNIT TOTAL 6503 1031 COMPANY/SOURCE TOTAL 6503 618 1031 CENTER BUDGET UNIT TOTAL COMPANY

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10/02/
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BA020

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STATE OF SOUTH DAKOTA MONTHLY EXPENDITURE REPORT FOR PERIOD ENDING: 09/30/2010

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	VENDOR GROUP												
	VENDOR NUMBER												12026948
	SHORT												HOLIDAYINN
	JV APPVL #, OR PAYMENT #					629920 629927					629924 629926 629920	629925 629927	99656937
	POSTING DATE		09/01/2010 09/17/2010	09/01/2010 09/17/2010	09/01/2010	09/01/2010 09/08/2010 09/08/2010 09/17/2010	09/01/2010 09/17/2010	09/01/2010 09/17/2010	09/01/2010 09/17/2010	09/01/2010 09/17/2010	09/08/2010 09/08/2010 09/08/2010	09/08/2010 09/08/2010	09/08/2010
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OF SOUTH DAKOTA	EXPENDITURE REPORT	ENDING: 09/30/2010
STATE	MONTHLY	FOR PERIOD

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	DR/ AMOUNT CR	93.00 DR * 38.00 DR 9.00 DR	47.00 DR * 47.00 DR 38.00 DR 14.00 DR	99.00 DR * 704.82 DR ** 3,200.00 DR	3,200.00 DR * 2,385.00 DR	2,385.00 DR * 105.00 DR	105.00 DR * 64.37 DR	64.37 DR * 119.86 DR	119.86 DR * 597.00 DR	597.00 DR * 1,269.45 DR	1,269.45 DR * 89.16 DR 95.00 DR	184.16 DR * 85.43 DR	85.43 DR * 23.35 DR	23.35 DR * 237.15 DR	237.15 DR * 9,013.04 DR	9,013.04 DR * 17,283.81 DR **
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PAGE 116		DR/ AMOUNT CR	77.24 DR	77.24 DR * 77.24 DR ** 254.32 DR	254.32 DR * 254.32 DR ** 18,320.19 DR *** 28,268.34 DR *** 28,268.34 DR **** 28,268.34 DR ****	
		VENDOR GROUP				
		VENDOR	12028533			
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STATE OF SOUTH DAKOTA MONTHLY EXPENDITURE REPORT FOR PERIOD ENDING: 09/30/2010		POSTING DATE	09/22/2010 99661891	09/08/2010		
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South Dakota Board of Accountancy Balance Sheet

As of September 30, 2010

	Sep 30, 10
ASSETS Current Assets Checking/Savings	
1130000 · Local Checking - US Bank 1140000 · Pool Cash State of SD	1,558.12 399,143.95
Total Checking/Savings	400,702.07
Total Current Assets	400,702.07
Fixed Assets 1670000 · Computer Software Original Cost 1770000 · Depreciation	140,063.23 -83,734.67
Total 1670000 · Computer Software	56,328.56
Total Fixed Assets	56,328.56
TOTAL ASSETS	457,030.63
LIABILITIES & EQUITY Liabilities Current Liabilitles Accounts Payable	
2110000 · Accounts Payable	481.36
Total Accounts Payable	481.36
Other Current Liabilities 2810000 · Amounts Held for Others	30,793.98
Total Other Current Liabilities	30,793.98
Total Current Liabilities	31,275.34
Long Term Liabilities 2960000 · Compensated Absences Payable	11,162.26
Total Long Term Liabilities	11,162.26
Total Liabilities	42,437.60
Equity 3220000 · Unrestricted Net Assets 3300100 · Invested In Capital Assets 3900 · Retained Earnings Net Income	200,030.18 56,328.56 15,790.05 142,444.24
Total Equity	414,593.03
TOTAL LIABILITIES & EQUITY	457,030.63

South Dakota Board of Accountancy Profit & Loss Budget vs. Actual July through September 2010

	Jul - Sep 10	Budget	\$ Over Budget	% of Budget
Ordinary Income/Expense				
4293550 · Initial Individual Certificate				
5208001 · Refunds 4293550 · Initial Individual Certificate - Other	-25.00 800.00	2,500.00	-1,700.00	32.0%
Total 4293550 · Initial Individual Certificate	775.00	2,500.00	-1,725.00	31.0%
4293551 · Certificate Renewals-Active	54,550.00	50,000.00	4,550.00	109.1%
4293552 · Certificate Renewals-Inactive	19,900.00	23,000.00	-3,100.00	86.5%
4293553 · Certificate Renewals-Retired	650.00	600.00	50.00	108.3%
4293554 · Initial Firm Permits 4293555 · Firm Permit Renewals	300.00	1,500.00	-1,200.00	20.0%
5208004 · REFUNDS	-50.00			
4293555 · Firm Permit Renewals - Other	19,950.00	18,350.00	1,600.00	108.7%
Total 4293555 · Firm Permit Renewals	19,900.00	18,350.00	1,550.00	108.4%
4293557 · Initial Audit	270.00	580.00	-310.00	46.6%
4293558 · Re-Exam Audit	690.00	1,660.00	-970.00	41.6%
4293561 · Late Fees-Certificate Renewals 4293563 · Late Fees-Firm Permit Renewals	5,500.00	3,500.00	2,000.00	157.1%
5208012 · REFUNDS	-50.00			
4293563 · Late Fees-Firm Permit Renewals - Other	1,150.00	800.00	350.00	143.8%
Total 4293563 · Late Fees-Firm Permit Renewals	1,100.00	800.00	300.00	137.5%
4293564 · Late Fees-Peer Review	300.00	1,250.00	- 950.00	24.0%
4293566 · Firm Permit Inidividual 5208003 · REFUNDS	-235.00			
4293566 · Firm Permit Inidividual - Other	68,250.00	64,000.00	4,250.00	106.6%
Total 4293566 · Firm Permit Inidividual	68,015.00	64,000.00	4,015.00	106.3%
4293567 · Peer Review Admin Fee	450.00	5,650.00	-5,200.00	8.0%
4293568 · Firm Permit Name Change	75.00	100.00	-25.00	75.0%
4293569 · Initial FAR 4293570 · Initial REG	540.00 180.00	990.00	-450.00	54.5%
4293571 · Inital BEC	420,00	530.00 670.00	-350.00 -250.00	34.0% 62.7%
4293572 Re-Exam FAR	630.00	1,540.00	-910.00	40.9%
4293573 · Re-Exam REG	570.00	1,680.00	-1,110.00	33.9%
4293574 · Re-Exam BEC 4491000 · Interest and Dividend Revenue	810.00	2,020.00	-1,210.00	40.1%
4896021 · Legal Recovery Cost	16,547.72 0.00	12,000.00 1,000.00	4,547.72 -1,000.00	137.9% 0.0%
Total Income	192,172.72	193,920.00	-1,747.28	99.1%
Gross Profit	192,172.72	193,920.00	-1,747.28	99.1%
Expense		,	.,	00.170
5101010 · F-T Emp Sal & Wages	12,420.41	66,239.00	-53,818.59	18.8%
5101020 · P-T/Temp Emp Sal & Wages	3,558.17	19,380.00	-15,821.83	18.4%
5101030 · Board & Comm Mbrs Fees 5102010 · OASI-Employer's Share	798.00 1,226.01	4,020.00	-3,222.00	19.9%
5102020 · Retirement-ER Share	958.72	6,549.00 5,147.00	-5,322.99 -4,188.28	18.7% 18.6%
5102060 · Health /Life InsER Share	3,489.35	17,869.00	-14,379.65	19.5%
5102080 · Worker's Compensation	27.17	133.00	-105.83	20.4%
5102090 · Unemployment Insurance	13.57	55.00	-41.43	24.7%
5203010 · AutoState Owned 5203020 · Auto-Private-Ownes Low Mileage	0.00 271.20	1,500.00 300.00	-1,500.00	0.0%
5203030 · In State-Auto- Priv. High Miles	398.12	2,100.00	-28.80 -1,701.88	90.4% 19.0%
5203100 · In State-Lodging	93.00	1,000.00	-907.00	9.3%
5203120 - In State-Incidentals to Travel	0.00	100.00	-100.00	0.0%
5203140 · InState-Tax Meals Not Overnigt	9.00	150.00	-141.00	6.0%
5203150 · InState-Non-Tax Meals OverNight 5203230 · OS-Auto Private High Mileage	137.00 0.00	500.00 100.00	-363.00 -100.00	27.4% 0.0%
5203260 · OS-Air Commercial Carrier	1,345.10	6,700.00	-5,354.90	20.1%
5203280 · OS-Other Public Carrier	42.00	500.00	-458.00	8.4%
5203300 · OS-Lodging	1,840.40	7,800.00	-5,959.60	23.6%
5203320 · OS-Incidentals to Travel 5203350 · OS-Non-Taxable Meals Overnight	61.00	200.00	-139.00	30.5%
5204010 · OS-Non- I axable Meals Overnight 5204010 · Subscriptions	259.00 0.00	1,000.00 1,500.00	-741.00 -1,500.00	25.9% 0.0%
· · · · · · · · · · · · · · · · · · ·	0.00	.,000.00	.,000.00	0.076

South Dakota Board of Accountancy Profit & Loss Budget vs. Actual July through September 2010

	Jul - Sep 10	Budget	\$ Over Budget	% of Budget
5204020 · Dues and Membership Fees	3.200.00	3,900.00	-700.00	82.1%
5204030 Legal Document Fees	0.00	500.00	-500.00	0.0%
5204040 · Consultant Fees-Accounting	0.00	6,000.00	-6,000.00	0.0%
5204160 · Workshop Registration Fees	2,465.00	5,200.00	-2,735.00	47.4%
5204180 Computer Services-State	171.00	600.00	-429.00	28.5%
5204181 Computer Development Serv-State	2,376.00	4.400.00	-2,024.00	54.0%
5204200 Central Services	1,553.19	7,500.00	-5,946.81	20.7%
5204220 · Equipment Service & Maintenance	25.43	300.00	-274.57	8.5%
5204230 · Janitorial/Maintenance Services	359.58	1,560.00	-1,200.42	23.1%
5204340 · Computer Software Maintenance	265.00	1,000.00	-735.00	26.5%
5204360 · Advertising-Newspapers	0.00	2,100.00	-2,100.00	0.0%
5204440 · Newsletter Publishing	486.89	1,100.00	-613.11	44.3%
5204460 · Equipment Rental	1,474.80	5,200.00	-3,725.20	28.4%
5204480 · Microfilm and Photography	0.00	700.00	-700.00	0.0%
5204490 · Rents Privately Owned Property	2,538.90	15,531.00	-12,992,10	16.3%
5204530 · Telecommunications Services	568.57	2,500.00	-1,931,43	22.7%
5204540 · Electricity	205.04	865.00	-659.96	23.7%
5204560 · Water	23.35	240.00	-216.65	9.7%
5204590 · Insurance Premiums/Surety Bonds	0.00	1,710.00	-1.710.00	0.0%
5204740 · Bank Fees and Charges	2,020.58	2,000.00	20.58	101.0%
5205020 · Office Supplies	101.09	1,500.00	-1,398.91	6.7%
5205310 Printing State	0.00	500.00	-500.00	0.0%
5205320 · Printing/Duplicating/Binding Co	332.97	1,000.00	-667.03	33.3%
5205330 · Supplemental Publications	0.00	700.00	-700.00	0.0%
5205340 · Microfilm Supplies/Materials	0.00	300.00	-300.00	0.0%
5205350 · Postage	507.15	3,100.00	-2,592.85	16.4%
5207430 · Office Machines	0.00	100.00	-100.00	0.0%
5207900 · Computer Hardware	0.00	4,800.00	-4,800,00	0.0%
5207950 · System Development	0.00	500.00	-500.00	0.0%
5207955 · Computer Hardware Other	0.00	500.00	-500.00	0.0%
5207960 · Computer Software Expense	0.00	500.00	-500.00	0.0%
5228000 Operating Transfers Out-NonBudg	1,089,14	6,500.00	-5,410.86	16.8%
5228030 · Depreciation Expense	3,017.58	0,000.00	-0,410.00	10.076
Total Expense	49,728.48	225,748.00	-176,019.52	22.0%
Net Ordinary Income	142,444.24	-31,828.00	174,272.24	-447.5%
Net Income	142,444.24	-31,828.00	174,272.24	-447.5%

South Dakota Board of Accountancy PREVIOUS YEAR MONTHLY COMPARISON

September 2010

	Sep 10	Sep 09	\$ Change	% Change
Ordinary Income/Expense				
Income 4293550 · Initial Individual Certificate	400.00	275.00	125.00	45.5%
4293551 · Certificate Renewals-Active	8,500.00	10,250.00	-1.750.00	-17.1%
4293552 · Certificate Renewals-Inactive	5,750.00	5,050.00	700.00	13.9%
4293553 · Certificate Renewals-Retired	360.00	270.00	90.00	33.3%
4293555 · Firm Permit Renewals	3,750.00	3,250.00	500.00	15.4%
4293557 · Initial Audit	120.00	30.00	90.00	300.0%
4293558 · Re-Exam Audit	330.00	150.00	180.00	120.0%
4293561 · Late Fees-Certificate Renewals	1,400.00	1,750.00	-350.00	-20.0%
4293563 · Late Fees-Firm Permit Renewals 4293564 · Late Fees-Peer Review	150.00 50.00	250.00 50.00	-100.00	-40.0%
4293566 · Firm Permit Inidividual	9,230.00	7,025.00	0.00 2,205.00	0.0% 31.4%
4293567 · Peer Review Admin Fee	75.00	75.00	0.00	0.0%
4293568 · Firm Permit Name Change	25.00	0.00	25.00	100.0%
4293569 · Initial FAR	270.00	0.00	270.00	100.0%
4293570 · Initial REG	60.00	30.00	30.00	100.0%
4293571 · Inital BEC	150.00	30.00	120.00	400.0%
4293572 · Re-Exam FAR	360.00	120.00	240.00	200.0%
4293573 · Re-Exam REG	210.00	210.00	0.00	0.0%
4293574 · Re-Exam BEC	390.00	60.00	330.00	550.0%
4491000 · Interest and Dividend Revenue 4896021 · Legal Recovery Cost	16,547.72 0.00	16,687.62	-139.90	-0.8% -100.0%
Total Income	48,127.72	1,047.36 46,609.98	-1,047.36 1,517.74	3.3%
Gross Profit Expense	48,127.72	46,609.98	1,517.74	3.3%
5101010 · F-T Emp Sal & Wages	1,608.13	1,501.37	106.76	7.1%
5101020 · P-T/Temp Emp Sal & Wages	452.12	218.76	233.36	106.7%
5101030 · Board & Comm Mbrs Fees	-342.00	-300.00	-42.00	-14.0%
5102010 · OASI-Employer's Share	127.67	100.17	27.50	27.5%
5102020 · Retirement-ER Share	123.61	103.20	20.41	19.8%
5102060 · Health /Life InsER Share	421.79	396.89	24.90	6.3%
5102080 - Worker's Compensation	3.51	1.87	1.64	87.7%
5102090 · Unemployment Insurance 5203260 · OS-Air Commercial Carrier	1.74	1.12	0.62	55.4%
5203280 · OS-Air Commercial Carrier 5203280 · OS-Other Public Carrier	0.00	1,331.69	-1,331.69	-100.0%
5203300 · OS-Lodging	0.00 0.00	96.00 1,852.76	-96.00	-100.0%
5203320 · OS-incidentals to Travel	0.00	65.00	-1,852.76 -65.00	-100.0% -100.0%
5203350 · OS-Non-Taxable Meals Overnight	0.00	212.00	-212.00	-100.0%
5204020 · Dues and Membership Fees	3,200.00	3,200.00	0.00	0.0%
5204030 · Legal Document Fees	0.00	15.00	-15.00	-100.0%
5204160 · Workshop Registration Fees	2,385.00	2,325.00	60.00	2.6%
5204180 · Computer Services-State	57.00	45.00	12.00	26.7%
5204181 · Computer Development Serv-State	48.00	648.00	-600.00	-92.6%
5204200 · Central Services 5204220 · Equipment Service & Maintenance	64.37	92.77	-28.40	-30.6%
5204220 · Equipment Service & Maintenance 5204230 · Janitorial/Maintenance Services	5.95 119.86	5.18 117.00	0.77 2.86	14.9% 2.4%
5204460 · Equipment Rental	93.60	252.39	-158.79	-62.9%
5204530 · Telecommunications Services	95.00	109.95	-136.79	-13.6%
5204540 · Electricity	56.85	47.94	8.91	18.6%
5204560 · Water	23.35	0.00	23.35	100.0%
5204740 · Bank Fees and Charges	237.15	272.95	-35.80	-13.1%
5205020 · Office Supplies	0.00	39.81	-39.81	-100.0%
5205320 · Printing/Duplicating/Binding Co	10.35	0.00	10.35	100.0%
5228000 · Operating Transfers Out-NonBudg 5228030 · Depreciation Expense	254.32 1,005.86	312.08 1,005.86	-57.76 0.00	-18.5% 0.0%
Total Expense	10,053.23	14,069.76	-4,016.53	-28.6%
Net Ordinary Income	38,074.49	32,540.22	5,534.27	17.0%
et Income	38,074.49	32,540.22	5,534.27	17.0%

South Dakota Board of Accountancy PREVIOUS YEAR TO DATE MONTHLY COMPARISON

July through September 2010

	Jul - Sep 10	Jul - Sep 09	\$ Change	% Change
Ordinary Income/Expense				
Income 4293550 · Initlal Individual Certificate	775.00	1,575.00	-800.00	-50.8%
4293551 · Certificate Renewals-Active	54,550.00	54,050.00	500.00	-30.8%
4293552 · Certificate Renewals-Inactive	19,900.00	19,350.00	550.00	2.8%
4293553 · Certificate Renewals-Retired	650.00	660.00	-10.00	-1.5%
4293554 · Initial Firm Permits	300.00	250.00	50.00	20.0%
4293555 · Firm Permit Renewals 4293557 · Initial Audit	19,900.00 270.00	19,550.00 60.00	350.00 210.00	1.8% 350.0%
4293558 · Re-Exam Audit	690.00	540.00	150.00	27.8%
4293560 · Late Fees-Initial Certificate	0.00	100.00	-100.00	-100.0%
4293561 · Late Fees-Certificate Renewals	5,500.00	5,450.00	50.00	0.9%
4293563 · Late Fees-Firm Permit Renewals	1,100.00	800.00	300.00	37.5%
4293564 · Late Fees-Peer Review 4293566 · Firm Permit Inidividual	300.00 68,015.00	150.00 63,090.00	150.00	100.0% 7.8%
4293567 · Peer Review Admin Fee	450.00	225.00	4,925.00 225.00	7.8% 100.0%
4293568 · Firm Permit Name Change	75.00	80.00	-5.00	-6.3%
4293569 · Initial FAR	540.00	150.00	390.00	260.0%
4293570 · Initial REG	180.00	150.00	30.00	20.0%
4293571 · Inital BEC 4293572 · Re-Exam FAR	420.00	120.00	300.00	250.0%
4293572 · Re-Exam FAR 4293573 · Re-Exam REG	630.00 570.00	360.00 660.00	270.00 -90.00	75.0% -13.6%
4293574 · Re-Exam BEC	810.00	510.00	300.00	-13.6% 58.8%
4491000 · Interest and Dividend Revenue	16,547.72	16,687.62	-139.90	-0.8%
4896021 - Legal Recovery Cost	0.00	1,047.36	-1,047.36	-100.0%
Total Income	192,172.72	185,614.98	6,557.74	3.5%
Gross Profit	192,172.72	185,614.98	6,557.74	3.5%
Expense	10 100 11			
5101010 · F-T Emp Sal & Wages 5101020 · P-T/Temp Emp Sal & Wages	12,420.41 3,558.17	12,420.41 3,770.65	0.00 -212.48	0.0%
5101030 · Board & Comm Mbrs Fees	798.00	720.00	-212.48 78.00	<i>-</i> 5.6% 10.8%
5102010 · OASI-Employer's Share	1,226.01	1,224.46	1.55	0.1%
5102020 · Retirement-ER Share	958.72	971.47	-12.75	-1.3%
5102060 · Health /Life InsER Share	3,489.35	3,283.37	205.98	6.3%
5102080 · Worker's Compensation	27.17	17.82	9.35	52.5%
5102090 · Unemployment Insurance 5203010 · AutoState Owned	13.57 0.00	10.54 158.90	3.03 -158.90	28.8%
5203020 · Auto-Private-Ownes Low Mileage	271.20	271.20	0.00	-100.0% 0.0%
5203030 · In State-Auto- Priv. High Miles	398.12	446.96	-48.84	-10.9%
5203100 · In State-Lodging	93.00	139.50	-46.50	-33.3%
5203140 · InState-Tax Meals Not Overnigt	9.00	9.00	0.00	0.0%
5203150 · InState-Non-Tax Meals OverNight 5203260 · OS-Air Commercial Carrier	137.00 1,345.10	166.00 1,331.69	-29.00 13.41	-17.5%
5203280 · OS-Other Public Carrier	42.00	96.00	-54.00	1.0% -56.3%
5203300 · OS-Lodging	1,840.40	1,852.76	-12.36	-0.7%
5203320 · OS-Incidentals to Travel	61.00	65.00	-4.00	-6.2%
5203350 · OS-Non-Taxable Meals Overnight 5204020 · Dues and Membership Fees	259.00 3,200.00	212.00	47.00	22.2%
5204030 · Legal Document Fees	0.00	3,200.00 15.00	0.00 -15.00	0.0% -100.0%
5204160 · Workshop Registration Fees	2,465.00	2,325.00	140.00	6.0%
5204180 · Computer Services-State	171.00	90.00	81.00	90.0%
5204181 · Computer Development Serv-State	2,376.00	1,128.00	1,248.00	110.6%
5204200 · Central Services 5204220 · Equipment Service & Maintenance	1,553.19 25.43	1,710.64 26.06	-157.45	-9.2%
5204230 · Janitorial/Maintenance Services	359.58	351.00	-0.63 8.58	-2.4% 2.4%
5204340 · Computer Software Maintenance	265.00	45.00	220.00	488.9%
5204440 Newsletter Publishing	486.89	537.20	-50.31	-9.4%
5204460 · Equipment Rental	1,474.80	1,259.40	215.40	17.1%
5204480 · Microfilm and Photography 5204490 · Rents Privately Owned Property	0.00 2,538.90	243.77 2,488.50	-243.77 50.40	-100.0% 2.0%
5204530 · Telecommunications Services	2,538. 9 0 568.57	2,466.50 517.82	50.40 50.75	2.0% 9.8%
5204540 · Electricity	205.04	144.82	60.22	41.6%
5204560 · Water	23.35	23.35	0.00	0.0%
5204740 · Bank Fees and Charges	2,020.58	1,497.26	523.32	35.0%
5205020 · Office Supplies	101.09	386.67	-285.58	-73.9%

South Dakota Board of Accountancy PREVIOUS YEAR TO DATE MONTHLY COMPARISON

July through September 2010

	Jul - Sep 10	Jul - Sep 09	\$ Change	% Change
5205320 · Printing/Duplicating/Binding Co	332.97	412.71	-79.74	-19.3%
5205350 · Postage	507.15	1,516.01	-1,008.86	-66.6%
5228000 · Operating Transfers Out-NonBudg	1,089.14	1,272.67	-183.53	-14.4%
5228030 · Depreciation Expense	3,017.58	3,017.58	0.00	0.0%
Total Expense	49,728.48	49,376.19	352.29	0.7%
Net Ordinary Income	142,444.24	136,238.79	6,205.45	4.6%
Net Income	142,444.24	136,238.79	6,205.45	4.6%

REQUEST FOR CPE EXTENSION

Nicole Kasin 10-7-10

I was contacted by a licensee requesting a 2nd extension for CPE. ARSD 20:75:04:10 states that upon request by an applicant for renewal of a certificate, the board may administratively grant one extension of 90 days to complete the minimum continuing professional education requirement. The board shall review subsequent requests for extensions and may grant them on a case by case basis for good cause. Good cause includes personal emergencies, acts of God, or administrative errors made by the board.

The first extension of 90 days was granted by the Board and CPE was to be completed by September 30, 2010.

The letter addressed to the board reads as:

Dear Board Members,

I respectfully request an additional extension to complete my CPE's for year ending June 30, 2010.

I have had a personal emergency that prevented me from timely completing my CPE.

I also wish to note that I completed the required hours on 10/02/10.

I thank you in advance for you understanding on this personal matter and pray that you allow my request as good cause.

Respectfully submitted,

Signed CPA

The CPA is in public practice and has been granted the administrative extension for 90 days in each of the following years: FY07, FY08, FY10 and FY11.

The Board is to approve or deny the subsequent extension request.

REPORT TO BOARD ON STATISTICS FROM ONLINE RENEWAL

Nicole Kasin 10-13-10

The renewal rates for FY11 are on the following page.

Since the online renewals began 2 years ago there was an overall increase in usage from FY10 to FY11 by 9.59%.

FY 11 produced the completion rate increases online from the prior year Firms - 16.28% Active - 6.94% Inactive - 11.59% Retired - 12.03%

	Form 19-	-Firm	Form 27-	Retired	Form 28-	Active	Form 29-l	nactive	
DATE			COMP APVD					,	Daily Totals
Tuesday, June 15, 2010 Wednesday, June 16, 2010	3	0	0	0	8	0	3	0	1 15
Thursday, June 17, 2010			1	0	10	5	11	0	32
Friday, June 18, 2010		1	1	0	8	2	9	0	22
Saturday, June 19, 2010	00	0	2	0	3	. 1	1	0	7
Sunday, June 20, 2010	0	3	1	0	1 11	0	1 10	0	3
Monday, June 21, 2010 Tuesday, June 22, 2010	6	1	3	0	11 12	1	10	0	35 32
Wednesday, June 23, 2010	3	1	0	0	10	1	1	0	16
Thursday, June 24, 2010	2	0	0	0	2	1	5	0	10
Friday, June 25, 2010	2	1	0	0	9	0	. 2	0	14
Saturday, June 26, 2010	1	0	0	0	3	2	. 0	0	6
Sunday, June 27, 2010 Monday, June 28, 2010	1 6	0 1	0	0	. 12	0	. 3	0	8 23
Tuesday, June 29, 2010	2	0	0	0	10	<u>-</u>	3	Ö	15
Wednesday, June 30, 2010	2	0	1	0	10	3	3	0	19
Thursday, July 01, 2010	1	O.	0	0	5	4	7	0	17
Friday, July 02, 2010	0	0	0	0	4 0	1	1	0	8
Saturday, July 03, 2010 Sunday, July 04, 2010		0	0	0	3	0	1	0	<u>1</u> 5
Monday, July 05, 2010	ō	0	0	0	2	0	2	0	4
Tuesday, July 06, 2010	0	0	1	0	2	3	5	0	11
Wednesday, July 07, 2010	5	0	0	0	7	1	2	0	15
Thursday, July 08, 2010	4	0	0	0	6	1	3	0	14
Friday, July 09, 2010 Saturday, July 10, 2010	4 0	0	0 0	0 0	6 2	0	8	0	18
Sunday, July 11, 2010	0	0	0	·0	0		2	0	3 2
Monday, July 12, 2010	Z	ō	o	0	7	0	4	. 0	13
Tuesday, July 13, 2010	4	0	1	0	12	2	2	0	21
Wednesday, July 14, 2010	4	0	1	0	9	1	2	0	17
Thursday, July 15, 2010 Friday, July 16, 2010		0	0	0	7	0	6	0	17
Saturday, July 17, 2010	·····	0	2	0	0	0	1	0	<u> </u>
Sunday, July 18, 2010	. 1	0	1	0	3	0	2	0	7
Monday, July 19, 2010		0	0	0	15	3	4	0	24
Tuesday, July 20, 2010		1	3	0	11	3	7	0	29
Wednesday, July 21, 2010 Thursday, July 22, 2010	2	<u>1</u>	0	- 0	9 8	2	<u>5</u>	0	21 14
Friday, July 23, 2010	3	0	1	0	12	2	5	0	23
Saturday, July 24, 2010	2	0	0	0	6	1	3	Ō	12
Sunday, July 25, 2010	0	1	0	0	. 4	0	3	0	8
Monday, July 26, 2010 Tuesday, July 27, 2010	3 7	3	0 1	0	16	3	8	0	33
Wednesday, July 28, 2010	6	0		 0	14	3	11 7	0	37 28
Thursday, July 29, 2010	11	1	0	0	24	2	12	0	50
Friday, July 30, 2010	14	3	0	0	33	9	20	0	79
Saturday, July 31, 2010	6	1	0	. 0	15	1	7	. 0	30
Sunday, August 01, 2010	1 1	0	0	0	2	0	3 .	0	6
Monday, August 02, 2010 Tuesday, August 03, 2010	2 0	0	. 0	0	6 2	0	1	0	14
Wednesday, August 04, 2010		1	0	0	2	1	1	0	<u>3</u>
Thursday, August 05, 2010	0	0	0	0	1	ō	1	0	2
Friday, August 06, 2010	0	0	0	0	1	0	0	0	1
Saturday, August 07, 2010	0	0	O	0	1	. 0		0	1
Tuesday, August 10, 2010 Thursday, August 12, 2010	0	<u>0</u>	1	0	0 1	1	1 2	0	4
Friday, August 13, 2010	2	0		0	1	1	2	0	6
Saturday, August 14, 2010	0	0	Ō	0	0	0	i -	0	1
Sunday, August 15, 2010	0	0	0	0	1	0	0	0	1
Monday, August 16, 2010 Tuesday, August 17, 2010	1	<u>0</u>	1	0	2	1	0	0	5
Wednesday, August 18, 2010	0	. 0	0 1	0	0	0	0	0	3
Thursday, August 19, 2010	0	1	0	0	0	0	0	0	1
Friday, August 20, 2010	0	0	0	0	0	. 0	1	0	1
Sunday, August 22, 2010	0	0	0	0	0	0	1	0	1
Monday, August 23, 2010 Tuesday, August 24, 2010	0	0	0	. 0	0	0	1	0	1
Wednesday, August 25, 2010	3	0	1 0	0	1	0	. 0	0	2 4
Friday, August 27, 2010	0	0	0	ō	0	0	1	- 0	1
Tuesday, August 31, 2010	0	0	Ó	0	0	1	1	0	2
Thursday, September 2, 2010	0	0	0	0	0	0	1	0	1
Monday, September 6, 2010 Tuesday, September 21, 2010	0	0	0 O	0	0	0	1	0	1
Totals	142	27	30	0	392	70	237	2	900
Totals per form	169		30	-	462		239		
Total Renewals									
Online & Via Mail	286		64		109)	397		1837
						1			
% Completed Online	59.09	%	46.88	%	42,39	19% 	60.20	1%	48.99%
% Completed Online Expired Status % Completed overall	59.09 15 95.02		46.88		42,39	% 	60.20	196	48.99%

REPORT TO BOARD ON EXPIRED LICENSEES

Nicole Kasin 10-13-10

The following pages show the individuals that did not renew their license for FY11 & FY10.

I will be publishing the list of expired licenses (FY11) in the winter newsletter and plan to send the full list from FY10 & FY11 to the accountancy boards and other interested parties. Names and last know addresses will be sent so boards can determine if the individual is in their state.

Christie J. Bakker Jerry M. Bland Jeffrey A. DeWitt 28903 8th Ave. S. Bland & Associates, P.C. 714 Britz Drive Federal Way, WA 98003 8712 W Dodge Road # 200 Luverne, MN 56156 Omaha, NE 68114 Sandra L. Diegel Jodi M. Digmann Joseph D. Dobbs 4502 Carriage Hills Drive 3148 Johnston Ct 6668 Berwick Court Rapid City, SD 57702 Rapid City, SD 57701 Rapid City, SD 57702 James A. Gilman Thomas N. Harper, Jr. Bruce A. Hasche Conway, Deuth & Schmiesing, PLLP 5417 Danford Road 2321 E Harriet Lea 331 SW Third Street Billings, MT 59106 Sioux Falls, SD 57103 Willmar, MN 56201 Brenda K. Hill Natalie L. Holland Ronald L. Jacobson 13036 Hwy 244 5440 N Tujunga Avenue # 717 6420 Longleaf Pine Drive Keystone, SD 57751 North Hollywood, CA 91601 Jupiter, FL 33458 Laura M. Jones Brenda J. Kosters Fred A. Lockwood 3912 Canyon Drive PO Box 57 4702 Cardinal Dr. Rapid City, SD 57702 Selby, SD 57472 Scottsbluff, NE 69361 Timothy D. Lord Ingrid M. Mallo Randall P. Neal 699 Evergreen Drive 1300 N Harrison # 207 2213 S Sheffield Grand Forks, ND 58201 Pierre, SD 57501 Sioux Falls, SD 57106 Robert E. Newman Eric S. Peterson Earl M. Phelps, Jr. 18 Joshua Drive 501 20th Ave NW PO Box 174 West Simsbury, CT 06092 Watertown, SD 57201 Aberdeen, SD 57401 Nicholas J. Rodgers Fumio Sekita Debra J. Senska 2913 Davenport Way Room 109 Ville Neuve Plaisir LodgeNet Interactive Sacramento, CA 95833 Sakaigihon cho 52-1 Hodogayaku 120 Interstate N Pkwy # 160 Yokohama Kanagawa, JAPAN 240-0033 Atlanta, GA 30339-2128 Sury R. Subban Karen A. Trierweiler William W. Wehrkamp 8 Mission Drive 444 Northridge Drive 3901 S Lisanne Avenue

Kalispell, MT 59901

Sioux Falls, SD 57103

Monroe TWP, NJ 08831-2378

Raymond P. Wood 3609 S Genevieve Avenue Sioux Falls, SD 57103 Lacey J. Andrews Adekunle R. Avodele 519 Education Drive 647 Beach 68th Street Malcolm, NE 68402-9547 Arverne, NY 11692 Ronald R. Booth Charles E. Bruckman 1291 Nursery Hill Court 2821 N Ohlman St. # 8 Arden Hills, MN 55112 Mitchell, SD 57301

Robert C. Burbach 30938 463rd Avenue Vermillion, SD 57069-6720

Robert C. Barnes

850 Main Street

Anil K. Chugh

Lois E. Dravland

Kristin K. Heil

2509 220th Street

Marshall, MN 56258-5309

11936 Doral Avenue

Northridge, CA 91326

2215 S Grange Avenue

Sioux Falls, SD 57105

Sturgis, SD 57785-1619

Ernst & Young LLP 303 Almaden Blvd San Jose, CA 95110 Shannon R. Clark

Beth M. Carr

Ronald D. Douglas Ev Lutheran Good Samaritan Society 6 Merry Lane 4800 W 57th Street Spearfish, SD 57783-1108 Sioux Falls, SD 57108

Lisa R. DuPont Werner W. Fick Brian K. Gramm 404 SW 12th Street, Apt A 119 Mary Lane Milo Belle Consultants, LLC Oak Grove, MO 64075-7050 Mankato, MN 56001 5124 S Western Avenue # 4 Sioux Falls, SD 57108-5047

Gary M. Cavett

51 Broadway # 601

Fargo, ND 58102

Gary Cavett & Co., CPAs

Stacey L. Gray 11784 N Strahorn Road Hayden, ID 83835

Jill R. Hegland Eide Bailly LLP PO Box 2545 Fargo, ND 58108-2545

Duane M. Heinert David J. Huls Susan A. Kennedy 5024 S 171st Circle 11165 Alameda Avenue 1100 Plum Creek Pkway # 5207 Omaha, NE 68135 Inver Grove Heights, MN 55077-5433

Castle Rock, CO 80104-4147 LaVerle E. Kepler Mark A. Kiroff Akiyo Kishida 3566 E Hwy 44 5336 S 145th Street 1-11-3 Minaminagasaki Rapid City, SD 57703-6057 Omaha, NE 68137 Toshima-ku Tokyo, JAPAN 171-0052

Gary M. Lubbers 6963 S Oxford Lane Chandler, AZ 85249 John W. Matthias, Jг. Jill M. Nussbaum 180 Valleywood Way 5540 Nathan Lane N # 1 Roseville, CA 95678-1085 Plymouth, MN 55442

Debra K. Raugutt 3334 Oxcart Lane Casper, WY 82604

David L. Seiler David L. Seiler, CPA, P.C. 2619 S Lakeport Street Sioux City, IA 51106-4144

Terrence J. Ward PricewaterhouseCoopers LLP 225 S 6th Street, Suite 1400 Minneapolis, MN 55402

Gabriel L. White 220 W 22nd Street Sioux Falls, SD 57105 Phillip Richmond Richmond & Wakefield, CPA's, P.C. 3800 Rogers Avenue # 7 Fort Smith, AR 72903

Sarah J. Snyder Avera Medical Associates Clinic 100 MAC Lane Pierre, SD 57501

Jeffrey S. Welsh 606 S Pinckney Street Elk Poit, SD 57025

Yunping Ye 7 Overridge Road Westport, CT 06880-4935 Russell J. Schwehr 16857 Trail View Circle Parker, CO 80134

Clint L. Taubenheim Commercial Investment Properties 8020 "O" Street Lincoln, NE 68510

Michael W. Wengel 2439 Hidden Acres Drive El Dorado Hills, CA 95762



AICPA BOARD OF EXAMINERS (BOE) October 1 - 2, 2010 Las Vegas, NV

MEETING HIGHLIGHTS

Participants

BOE Members: Douglas Warren (Chair), Colleen Conrad (Immediate Past Chair), Ken Askelson, O. Whitfield Broome, Kenneth Clark, Ruben Davila, Gary Fish, James Flagg, Suzanne Lane, Gary Lubin, Wendy Perez, Richard Piluso, John Roemer, Sharon T. Walters, Barbara Plake

AICPA Staff: Craig N. Mills, Michael A. Decker, John Mattar

NASBA Observers: Sandra Wilson (Examination Review Board); Rick Reisig (CPA Licensing Examination Committee);

At the October 1 - 2, 2010 BOE meeting:

- Mr. Doug Warren, Chair of the Board of Examiners, presented a report on volunteer committee selections for the upcoming 2010-2011 committee year.
- Dr. Craig Mills presented the Vice President's Report on the general state of the program. Dr. Mills provided an update on the international testing contracts, and reviewed recent testing volume and candidate statistics. Dr. Mills also shared his vision for item and test development using new technologies and applications.
- Dr. Mills reported on the September meeting with the New York State Board for Public Accountancy to discuss the validation process used to introduce IFRS in the CSOs.
- Dr. Mills discussed the new website <u>This Way to CPA</u>, a site designed to attract young people to the accounting profession and support their progression through the licensure process.
- Mr. Michael Decker, Director of Operations and Development, presented an operations and staffing plan report covering the metrics used to assess progress toward meeting goals. Mr. Decker announced that the Examination team has finalized a site for relocation.
- BOE Committee activities reports were presented. Mr. Ken Clark, Chair of the Content Committee, reported on the issues considered at the September Content Committee meeting. Dr. O. Whitfield Broome, Chair of the State Board Committee (SBC), reported on the May Central Regional Forum in Dallas, and August SBC Meeting. Dr. Broome also reported on plans to hold a Northeast Regional Forum in early 2011. Dr. Suzanne Lane, Chair of the Psychometric Oversight Committee (POC), reviewed activities on the October POC meeting agenda.



- The role of the BOE was discussed.
- Mr. Ken Clark presented a CBT-e status report.
- Mr. Clark presented a status report on recent Item Development Process Sponsor Group activities.
- Dr. John Mattar presented a preview of the November Standard Setting meeting.
- Ms. Sandra Wilson presented a report regarding current Examination Review Board (ERB) activities, including the restructuring of the ERB.
- Mr. Rick Reisig presented a report on the activities of the CPA Licensing Examination Committee (CLEC), including discussions on the future of the CLEC.

NASBA

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October 1, 2010

To State Board Members and Executive Directors:

We are writing to inform you of recent developments within the Blue Ribbon Panel on Standard Setting for Private Companies (BRP) established by the Financial Accounting Foundation (FAF), the organization that governs the Financial Accounting Standards Board (FASB) and the Governmental Accounting Standards Board, to consider the reporting needs of and standard setting for private companies. The FAF invited NASBA and the American Institute of Certified Public Accountants (AICPA) to join with the FAF on the BRP. Billy M. Atkinson, CPA, NASBA Chair, is NASBA's representative on the BRP. Upon conclusion of its deliberations, the BRP will report its findings and make recommendations to the FAF.

The BRP is scheduled to meet again on October 8, 2010 in New York City to further discuss the needs of users of private company financial statements and the issues raised principally by practitioners and preparers about the relevance of the current financial reporting model. In preparation for its meeting, the BRP solicited public input on questions about reporting needs for private companies and the responses are now available on the site www.fasb.org.

Prior to developing the position of NASBA on reporting for private companies, Chair Atkinson had met via conference call with the NASBA Regulatory Response Committee, Ethics and Strategic Professional Issues Committee and members of the Board of Directors.

Points delivered to the BRP by Chair Atkinson follow (the full text is Attachment A).

Importance of the Financial Accounting Foundation

As an independently funded body, it is very important from a public confidence and protection standpoint that the FAF continue, or step up if necessary, its leadership of the FASB, as originally designed. Further, the FAF must both establish and maintain the strategy, fairness and consistency of the promulgation process for accounting and financial reporting rules, as supported by a conceptual framework. If this is not accomplished at least as consistently as it is today, ad hoc changes to financial reporting standards will occur, public confidence will subside and governmental intervention could take place. Such concerns have already been expressed, by the State Boards and others, relative to how the International Financial Reporting Standards are set through the International Accounting Standards Board. The FAF's adherence to its mission is paramount to the ultimate conclusions reached by the BRP. We support the FAF.

The U.S. Should Have Only One Accounting Standard Setter and One Set of Standards.

The FASB should be structured with greater private entity representation and focus. This could take the form of additional FASB board members and/or programmed expectations by the FAF on behalf of the public and all constituents. There may be various ways to get it done effectively, but a fundamental change in the orientation of the FASB is an immediate must.

The capital formation, financial analysis and regulatory processes need one set of accounting standards that are supported by a fundamental guiding framework to assure continuity and mitigate risk. Our college accounting education, as well as continuing professional education processes, must not have bifurcated systems of "rules" supported by two sets of "accounting theory" or separate frameworks.

Model that the State Boards of Accountancy Support

We believe the State Boards must support a model for U.S. GAAP that would provide minimal, but allowable, exclusions or enhancements as to disclosure and financial reporting, but not as to measurement. Such standards development must be supported by a vibrant formal private entity work stream within the FASB, together with board member emphasis. The objective is to best avoid differential standards by uncoordinated standard setting bodies, and to utilize the existing structure.

It is our strong conviction, based on input from State Board members through our committees and at various meetings of NASBA, that State Boards would not support a model that would establish a separate, stand-alone standard setter for US. GAAP for private companies.

Restoration of Principles-Based Standards

NASBA believes that a restoration of principles-based standards could very well emanate from an improved FASB structure with greater private entity focus. We recognize there may appear to be issues or impediments to a transitional shift to more principles-based standards. This, and all such related perceived issues, simply must be formally studied.

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We will keep you informed of further developments of the BRP.

Very truly yours,

Billy M. Atkinson, CPA NASBA Chair David A. Costello, CPA President & CEO

Attachment A

BLUE RIBBON PANEL

Comments by NASBA Chair - Billy M Atkinson, CPA

July 19, 2010

The State Boards of Accountancy and I have studied the draft models and related information carefully. This especially includes issues surrounding the "why" changes may be needed. If, indeed, the disposition of this broad issue is dependent on expressed concerns of the "users", we have obviously not yet made the case at these meetings. If, however, the preparer and practitioner group truly represents the concerns of their constituents, something of change is needed. Hopefully, we can achieve some clarification here today and thus move into the "model" related discussions. I am confident that can happen.

The State Boards do indeed believe that changes are needed and the draft outline has helped us in studying & debating proposed changes. A few relevant points of both observation and concern to us are as follows:

- a. We have deep respect for the function & performance of the FASB over the many years of its existence. FASB accounting and financial reporting standards have, in our view, evolved into a complex web of "rules based standards". The origin and continuance of such an approach must be evaluated. Professionals and industries have made a very good living off of structured transactions in response to rules based or specific standards which simply cannot predict future transactions or deal structures. If you will, specific rules only generate more structured deals and the game has continued. As a result the related accounting simply has a history and may not necessarily have a conceptual framework relationship or guide. Such has led us to what we refer to as "complexities" in accounting and financial reporting. Many pedestrian transactions of "Main Street" often become servant to such complexity & history. Arriving at the wrong accounting answer often violates both state and federal laws for practitioner and preparer. We believe the cost of the accounting, disclosures and financial reporting to preparers and practitioners, not to mention the regulatory risks, should be of concern to users. Principle based standards of accounting measurement, disclosure and financial reporting, supported by a consistent conceptual framework and accounting theory must return to this environment in the U.S.
- b. The FASB, based on its agenda and recent output, is and has been considerably focused on IFRS & convergence. As a result, many of the safeguards associated with sound accounting and financial reporting standards' development may be strained or weak in assuring proper consideration among all constituents, including private entities. As we have expressed on several occasions, we do not oppose IFRS accounting standards per se'. But, among other issues, we do have concerns over its governance, the prospect of no due process of standard setting within the US and the private entity financial reporting concerns evolving in the wake of the IFRS initiative.
- c. Based upon output trends, we see little evidence of consistent private entity, or main street input or considerations in accounting standard development. The PCFRC work streams and recommendations have apparently had little influence in standard development or FASB agenda setting. The AICPA task force recommendations have likewise had little impact on direction of standard setting. It is not evident that private entity considerations exist in today's rule making.

- d. The capital formation, financial analysis and regulatory processes need one set of accounting standards that are supported by a fundamental guiding framework to assure continuity and mitigate risk. Our college accounting education, as well as continuing professional education processes must not have bifurcated systems of "rules" supported by two sets of "accounting theory" or framework.
- e. We must respect the main street businesses within our economy, not impede their development and not confuse or complicate their basis of financial reporting with a set of standards that have been far from perfect and born within a flurry of convergence mania. Further, we don't want to lose the ability to compare private vs. public entity financial statements.
- f. Apparently considerable resources from preparers and practitioners may be wasted in arriving at today's GAAP financial statements that are effectively being discounted, evaluated for cash flow or other measures by the users. Perhaps there is room for a reconciliation of users needs vs. financial statement measurement, disclosure and reporting.

In view of these expressed observations and concerns, our current viewpoints relative to the draft models are as follows:

- 1. Importance of the Financial Accounting Foundation. As an independently funded body, it is very important from a public confidence and protection standpoint that it continue (or step up, if necessary) its leadership of the FASB, as designed. Further, it must both establish and maintain the strategy, fairness and consistency of the accounting and financial reporting rules promulgation process which is supported by a conceptual framework. If this is not properly accomplished consistently, as we may somewhat be seeing today, ad hoc changes to financial reporting standards will continue, public confidence will subside and governmental intervention could occur. Such concerns have already been expressed, by the State Boards and others, about IFRS standard setting prospects through the IASB. Thus, the FAF's mission is paramount to the ultimate conclusions reached by this Panel. We support the FAF.
- 2. The U.S. should have only one accounting standard setter. The FASB should be structured with greater private entity representation and focus. This could take the form of additional FASB board members and/or programmed expectations by the FAF on behalf of the public and all constituents. There may be various ways to get it done effectively, but a fundamental change in the orientation of the FASB is an immediate must.
- 3. The State Boards of Accountancy today support an approach of U.S. GAAP, for private entities, together with minimal, but allowable, exclusions or enhancements as to disclosure and financial reporting but few, if any differences as to measurement. Such standards development must be supported by a vibrant formal private entity work stream within the FASB together with board member emphasis. Our objective is to best avoid differential standards by different standard setting bodies and utilize the existing structure which, we believe, needs repair.
- 4. It is our view that a restoration of principle based standards should emanate from an improved FASB setting with greater private entity focus. We recognize there may appear to be issues or impediments to a transitional shift to more principles based standards. This, and all related perceived such issues, simply must be formally studied.