

Explanatory Memorandum

Introduction

The Statement on Standards for Continuing Professional Education (CPE) Programs (Standards) is published jointly by the American Institute of Certified Public Accountants (AICPA) and the National Association of State Boards of Accountancy (NASBA) to provide a framework for the development, presentation, measurement, and reporting of CPE programs.

The Standards are intended to be an “evergreen” document. The Standards are reviewed and evaluated every two years from the effective date of the last revision to the document. The Standards were last revised with an effective date of September 1, 2016.

Changes From Existing Standards

Article I - Definitions:

- Adaptive learning self study program was added. Definition describes adaptive learning within the self study standards and references the methodology to be used in determining the CPE credit for an adaptive learning program.
- Clarified the definition of a blended learning program to incorporate both asynchronous and synchronous learning activities.
- Included definitions for content reinforcement tools and content reviewer as these terms are used throughout the Standards.
- The definition of a nano learning program was revised to remove the reference to a tutorial program as that was deemed confusing and included the parameter that a nano learning program be a minimum of 10 minutes but less than 20 minutes.
- Added a definition of subject matter expert as the terms is used throughout the Standards.
- Removed the definition of tutorial as it is no longer a term used to define a nano learning program.

Article III - Standards for CPE Program Sponsors:

Program Development:

- S7-01 – Clarified that in certain limited circumstances, an element of engagement may not be appropriate. Those cases must be documented.
- Standard 9 – Throughout the Standards, review questions are now referred to as *review questions or other content reinforcement tools*. This allows for flexibility and innovation for CPE providers.
- S9-03 – Clarification to require compliant feedback for “true or false” questions even though they do not count towards the minimum number of required review questions.

- Standard 10 revision to allow for review questions or other content reinforcement tools in a nano learning program.
- S11-02 – Clarification in blended learning to align terms of asynchronous and synchronous learning activities.
- S11-03.1 – Clarification that a qualified assessment in blended learning must be completed with a minimum passing grade of 70 percent as in self study programs.
- S11-04 – Clarification that courses offered for credit from an accredited university or college are deemed blended learning programs. The Standards are not intended for college and universities that are issuing college credit for courses. These colleges and universities already have their curriculum reviewed and vetted during the accreditation process and are continuously re-evaluated.

Program Presentation:

- S14-01 – Clarification in the solicitation of evaluations for larger programs/conferences.

Program Measurement:

- Standard 16 – Included a table to assist in the understanding of awarding CPE credit in the different instructional delivery methods. This is the same table included in the UAA CPE model rule.
- S16-03 – Table added to assist sponsors in the minimum number of monitoring mechanisms required in a group internet based program in which fractional CPE credit is awarded. This table follows the guidelines for review questions to self study programs in S9-02.
- S17-09 – Added to describe the requirements for CPE credit calculation for an adaptive learning self study program. Adaptive learning programs must be pilot tested and the minimum number of pilot testers has been expanded from the number required for the traditional self study program.
- Standard 18 – Revised to require review questions to be considered in the duration of a nano learning program (in addition to the course content and qualified assessment) and to require the use of Method 2 in S17-07 to confirm that the nano learning program is a minimum of 10 minutes but less than 20 minutes.
- Standard 20 and throughout the Standards – Revision made to consistently refer to the review of program materials conducted by a subject matter expert as a “content review” throughout the document. In some places, this review was referred to as a technical review and in other places as a review by an independent party.

Program Reporting:

- Standard 23 – Clarified that documentation of participation in a program should be allocated by field(s) of study.

- S24-05 – Requirement for documentation to be maintained by a CPE program sponsor of an independent study program was added for consistency with the other instructional delivery methods included in the Standards.

NASBA Fields of Study Document:

- Reminder included in the introduction section of the document that a sponsor may re-issue a certificate of completion to a CPA in the instance that the field of study does not align to a CPA’s state board of accountancy’s accepted fields of study. The CPE sponsor is responsible for ensuring that the alternate, state-specific fields of study under which the credits are being awarded reasonably reflect the underlying content of the course.
- The Information Technology field of study language was revised to reflect the organization of other fields of study in the document and ensure that current, relevant terms were used in the description.

Effective Date:

- No specific date has been recommended and the effective date is dependent on the timing of review and approval through NASBA’s CPE Committee, the Joint AICPA/NASBA CPE Standards Committee, and ultimately, the respective AICPA and NASBA Boards of Directors.
- The proposed revisions could have the effective date of the Boards’ final approval.

Request for Comment

Issue 1: S11-02 requires that if the primary components of a blended learning program are synchronous learning activities, then CPE credits for pre-program, post-program and homework assignments cannot constitute more than 25 percent of the total CPE credits available for the blended learning program.

The intent of the 25 percent limitation to pre-program, post-program and homework assignments was to discourage CPE program sponsors from adding activities that take away from the primary synchronous component of the program and that may not directly align with the learning in order to increase the amount of CPE credit available for the blended learning program.

Request for Comment 1

Please provide your views on the requirement that limits the amount of pre-program, post-program and homework assignments. Is there a more appropriate parameter that would not restrict the design of the blended learning program but that would focus pre-program, post-program and homework assignments on quality activities?

Issue 2: S17-09 requires that the CPE credit calculation for adaptive learning self study programs be based on a representative completion time of a sample group of pilot testers. The sample group must consist of at least seven qualified individuals who are independent of the program development group.

The rationale for requiring pilot testing is that the adaptive learning format results in varied completion times based on the learner's knowledge and proficiency in the content of the program. Adaptive learning platforms do not commonly have the capability to measure active learning time.

Consideration was given to the word count formula methodology as provided for traditional self study programs. However, determining how the word count formula would be applied is challenging. What learning path in the adaptive learning program would yield the most appropriate CPE credit calculation? How would a CPE program sponsor determine the most appropriate learning path on which to base the calculation?

Request for Comment 2

Please provide your views on the requirement to base the CPE credit calculation for an adaptive learning self study program on pilot testing. If you believe that other credit determination methodologies should be accepted, please provide specifics of your recommendation.

Guide for Respondents

Comments are sought on both the Exposure Draft of the Statement on Standards for Continuing Professional Education (CPE) Programs and the Fields of Study document. Areas in which specific comments are sought are included in the Request for Comment section.

Comments are most helpful when they refer to specific paragraphs, include the reasons for the comments, and, when appropriate, make specific suggestions for any proposed changes to the wording.

Responses should be sent to Jessica Luttrull at jluttrull@nasba.org and received by August 31, 2019.

Comment Period

The comment period for this Exposure Draft ends August 31, 2019.