



August 24, 2004

Wesley Johnson  
National Association of State Boards of Accountancy  
150 Fourth Avenue North, Suite 700  
Nashville, TN 37219-2417

Dear Mr. Johnson:

I am writing on behalf of the Board of Directors of the Federation of Schools of Accountancy - The Organization of Accredited Graduate Programs in Accounting (FSA). We recently learned of the NASBA/AICPA 150-hour Task Force on Education Rules and its work to revise the education requirements for the CPA certificate. Given our mission to support the development of high quality education programs for the accounting profession and to be an advocate of accredited graduate accounting programs, we are vitally interested in changes to the education requirements for the CPA certificate.

We certainly agree with your premise that there is a need for a greater set of transferable skills and content knowledge than in the past. We also strongly support the position that programs should include the development of skills required to apply knowledge attained and an enhancement of the individual's potential to contribute to the professional culture of accounting through appropriate emphasis on ethical conduct and professional responsibility. However, because detailed rules have the potential to both reduce creativity in education programs and to create significant unintended consequences, we urge you to widely disseminate the proposed changes and to seek input and comment from a wide array of stakeholders. For example, some of our board members felt that the detailed specificity of the regulations might actually cause some schools to eliminate recently added program innovations or others to even discontinue accounting programs. Others believe that if the new requirements were met by adding to the curriculum, it might decrease the number of quality students interested in entering accounting programs. It is our opinion that these and other significant possible unintended consequences merit a wide discussion of potential rule changes before any action is taken.

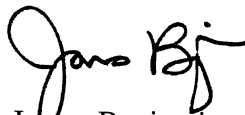
We would be glad to assist you in obtaining input and discussion from accounting educators on the proposed rules. Given the importance of this issue, we would be happy to devote a portion of our next annual meeting (a joint meeting of the FSA and the Accounting Program Leadership Group of the American Accounting Association) in February 2005 to a discussion of the proposed changes. We could also distribute the proposal to all of our members and request that comments be forwarded to your task force.

DEPARTMENT OF ACCOUNTING

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I have no doubt that your task force has given considerable time and thought to the issues, and I know that it is often frustrating to get unsolicited input in the middle of a process. However, I want to assure you that we are also very interested (as both an organization and as individuals) in the quality of accounting education and we believe that a broader discussion of any proposed changes would positively contribute to the achievement of our shared goals. I hope to hear from you.

Sincerely,

A handwritten signature in black ink, appearing to read "James Benjamin". The signature is fluid and cursive, with the first name "James" being more prominent than the last name "Benjamin".

James Benjamin  
Professor of Accounting  
& President, FSA

cc: George Krull  
Chair, AICPA Pre-Certification  
Education Executive Committee