

Virginia's *Regulatory* Landscape for CPAs 2023

WHAT YOU
NEED TO KNOW



ETHICS
COURSE

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INTRODUCTION

The CPA designation carries a value to each CPA. While the value is most obvious through its positive impact on professional careers, the CPA also brings opportunities for a professional to serve in volunteer roles and obtain a valued position in society. The favored status of CPA brings an expectation of good judgment, integrity, quality of character and other positive attributes. Therefore, in order to maintain the value of our profession, CPAs seek to obtain and maintain the public's trust in professionalism, judgment and skills.

Join the VSCPA's Emily Walker, vice president of advocacy, as she talks with leading experts in the accounting profession, Barclay Bradshaw, CPA; Nancy Glynn, CPA; and Toni Lee-Andrews, CPA; while they navigate the many different laws, regulations, and guidance that CPAs must understand and abide by while providing services to a company or the public as a licensed CPA in the Commonwealth of Virginia.

We designed this course to help you navigate the many different rules, expectations and constraints any CPA should consider when making decisions on a daily basis.

When you complete this course, you will be able to:

- Describe the difference between statutes, regulations, policies and ethics
- Demonstrate sound ethical judgment using the Code of Professional Conduct
- Outline the rules that govern the profession in the Commonwealth of Virginia
- Determine the CPE requirements needed to maintain your license in good standing

VIRGINIA BOARD OF ACCOUNTANCY

The [Virginia Board of Accountancy's](#) (VBOA) mission is to protect the citizens of the Commonwealth through a regulatory program of licensure and compliance of CPAs and CPA firms. The VBOA achieves this mission through a program of examination, licensure for individuals and firms, consumer protection with enforcement, continuing professional education audits, and peer review oversight.

The VBOA is a non-general fund agency whose revenues are wholly dependent upon the fees established for CPA Exam candidates, applicants, licensees and firms.

The VBOA consists of seven members appointed by the governor. The Board includes four members who hold Virginia licenses and have been actively engaged in providing services to the public for at least three years; one member who holds a Virginia license actively engaged in providing services to the public or on behalf of an employer in government or industry for at least three years; one educator in the field of accounting who holds a Virginia license; and one public non-CPA member. Each member is appointed to serve a four-year term and may not serve more than two consecutive terms.

The Board meets at least six times a year or more depending on what requires its attention. It is required to publicly post an agenda in advance of upcoming meetings and any minutes taken during a meeting. These can be found along with a schedule of future and past meetings on the Virginia Regulatory Town Hall website, <https://townhall.virginia.gov>.

All meetings are open to the public and include a five-minute public comment period per speaker at the beginning. The Board will inform the public should they need to go into closed session to discuss issues of enforcement or legal or personnel matters. All meetings are required to have a quorum of board members in order to take place. Additionally, a representative from the attorney general's office is often present.

Meetings cover a wide array of topics including reports from Board members on various committees on which they serve with the National Association of State Board of Accountancy (NASBA), policy updates, legislative updates, and a report on VBOA activities from the executive director and agency staff.

VBOA staff also track and report on the number of new, out-of-state or resigned licensees; number of Exam candidates; and number of new, reinstated or expired firm licensees. Staff also report on enforcement activities including new cases, types of complaints, and the status and number of CPE audits. Each of these data points is compared to previous years to provide a thorough view of the CPA profession in Virginia.

One of the biggest charges of the VBOA is to protect the public, so it investigates complaints against CPAs and CPA firms who hold current or expired licenses in Virginia. The VBOA will also investigate an individual or entity who may be using the CPA designation without a license or performing services that are restricted to CPAs or CPA firm licensure. The VBOA does not have authority over non-CPA accountants or bookkeepers unless they are holding themselves out as CPAs without having obtained the designation. The VBOA also audits and sanctions CPAs who do not meet the continuing professional education requirements, as well as CPA firms required to be enrolled in peer review.

Differences between VBOA and VSCPA

The VBOA is a regulatory agency with the main objective of protecting the public in Virginia. That is accomplished through regulating CPAs and CPA firms in Virginia through examination, licensure for individuals and firms, consumer protection with enforcement, CPE audits, and peer review oversight. The VBOA's authority is established by law in the Code of Virginia.

The Virginia Society of CPAs (VSCPA) is a membership-based organization that CPAs choose to join. The VSCPA is focused on issues CPAs face every day and helping members thrive.

The following chart shows an overview of the main differences:

VBOA	VSCPA
<ul style="list-style-type: none"> • A State agency 	<ul style="list-style-type: none"> • A voluntary membership organization
<ul style="list-style-type: none"> • Mission – to protect the public 	<ul style="list-style-type: none"> • Mission – to help CPAs thrive
<ul style="list-style-type: none"> • Grants license to individuals and firms 	<ul style="list-style-type: none"> • Has no licensing authority
<ul style="list-style-type: none"> • Has regulatory authority 	<ul style="list-style-type: none"> • Has no regulatory authority
<ul style="list-style-type: none"> • Has an enforcement process 	<ul style="list-style-type: none"> • Has no enforcement authority
<ul style="list-style-type: none"> • Audits CPE for compliance 	<ul style="list-style-type: none"> • Provides CPE to help CPAs maintain license

LEGALLY SPEAKING

With public expectations come laws that have been established by representatives of the general public. Our society quite often enacts legislation to either motivate proper behavior or punish improper behavior, but both perspectives seek to obtain the expected behavior. Thus, we are a society of laws.

Since its beginning, with the major exception of the impact of the Sarbanes-Oxley Act (SOX) and the Public Company Accounting Oversight Board (PCAOB), the CPA profession has attempted to, for the most part, self-regulate. In the United States, licenses for CPAs are regulated and controlled by state laws. While state boards of accountancy are established by law to govern the licensed activity of the profession, many states, including Virginia, regulate the ethical conduct of the profession in part by the statutes or legal authority and in part by reference to other guidance for the conduct of CPAs, such as the American Institute of CPAs (AICPA) Code of Professional Conduct.

Code of Virginia [§ 54.1-4413.3](#), (4), "Standards of conduct and practice," requires all Virginia licensed CPAs to conform to several standards of conduct and practice, including: "the Code of Professional Conduct, and the related interpretive guidance, issued by the American Institute of Certified Public Accountants, or any successor standard-setting authorities."

Thus, upon the legal base of conduct, the [AICPA Code](#) is established as an additional layer of guidance. The AICPA Code is often viewed by CPAs as simply another set of rules to follow. However, even in its discussion of compliance, the Code notes its role in society and the interplay with public opinion and the society as a whole.

Compliance with the Code, as with all standards in an open society, depends primarily on members' understanding and voluntary actions, secondarily on reinforcement by peers and public opinion, and ultimately on disciplinary proceedings, when necessary, against members who fail to comply.

The last legal layer is policies. Policies are created and voted on by the VBOA and further interpret statutes and regulations. They are authoritative but don't carry as much weight as statutes and regulations.

The interaction with society and the public perception referred to in the AICPA Code denote an additional level of ethical behavior or ethical decision-making, which is based on moral reasoning. This suggests that once legal compliance is met and actions are considered within the context of the Code, CPAs often utilize other decision models to determine ethical courses of action. Because CPAs are valued members of society, the public does have an expectation that CPAs can make not only good decisions, but decisions that are morally acceptable.

In short, situations may arise that laws, codes of conduct or rules cannot adequately, efficiently or quickly address. Yet a CPA is expected to be a trusted advisor, so perhaps each professional should consider an individual approach or methodology for solving ethical issues. There certainly cannot be a one-size-fits-all solution, because the very nature of ethical decision-making is based on the reality that each person is ultimately the final judge of their own moral decisions. Unfortunately, CPAs must make ethical judgments under the pressure of the opinion of others.

Sources

[American Institute of CPAs Code of Professional Conduct](#)

["Ethical conduct is never out of vogue."](#) CGMA. Nov. 21, 2012.

INDIVIDUAL LICENSURE & CPE REQUIREMENTS

Understanding how CPAs are regulated in Virginia is key to the competence and success of licensees throughout their careers. The remainder of this course is designed to highlight key items every CPA practicing in Virginia needs to know to maintain compliance. This begins with understanding individual and firm CPA licensure and renewal as well as grasping the enforcement process and licensee rights within that process.

Individual license

A CPA candidate must first meet the 3 E's before applying for licensure: education, exam and experience. A candidate can sit for the CPA exam after completing 120 credit hours and obtaining a baccalaureate or higher degree with an accounting concentration or equivalent. To apply for a license, a candidate must complete 150 credit hours and pass the CPA exam with a score of 75 or higher on each section within an 18-month period. An applicant must also complete at least 2,080 hours or equivalent to one year of full-time employment using accounting, financial, tax, or other skills.

To use the CPA title in Virginia, an individual CPA license is required. Virginia offers two different license statuses, Active and Inactive, both of which entitle the beholder to using the CPA designation. However, the Inactive status is only available if a licensee's current job duties do not require the use of accounting, financial, tax or other skills that are relevant as determined by the VBOA. Licensees must be pre-approved for the Inactive status. If approved for Inactive status, licensees are not required to meet the VBOA's CPE requirements — but are still required to renew their licenses annually. Examples of when the inactive status is available as well as the application can be found on the VBOA website at <https://boa.virginia.gov/individual-cpas/inactive-status/>.

NOTE: If after being approved for Inactive status a licensee's situation changes, the licensee must notify the VBOA to determine if they still qualify for Inactive status. If the VBOA determines the licensee is no longer eligible for Inactive status, the licensee must take the requisite CPE needed for an active license.

CPA licensees are expected to renew their annual licenses on time each year. It is the responsibility of the licensee to renew their license, if they choose, regardless if they receive a reminder notice for renewal from the VBOA. ALL Virginia licenses must be renewed by June 30 of a given year, regardless of license status. Licensees will begin getting notices via email 120 days prior to the June 30 deadline. The VBOA also sends out several more reminders via email, U.S. Postal Service, and text message if opted in.

Licensees who choose not to renew their licenses are encouraged to contact the VBOA to voluntarily surrender their licenses before they become expired.

Continuing Professional Education Requirements (CPE)

As a new licensee, you will need to earn CPE to maintain your active licensee status. Important to note: If this is your first calendar year with your license, no CPE is required for initial licensure if the application is submitted within the same calendar year in which you passed the CPA Exam.

If an applicant has not held a CPA license in any other state and applies for a Virginia license after the end of the calendar year in which the applicant passed the Exam, CPE must be obtained prior to applying for a Virginia license. And remember: Your CPE must include the annual Virginia-Specific Ethics Course.

Active CPAs must complete the required 120 CPE hours over a rolling three-year period, with a minimum of 20 hours annually. The CPE requirement also includes completing the two-hour Virginia-Specific Ethics Course annually and eight hours of accounting and auditing ethics courses, if applicable. The minimum hours needed for applicants who apply for licensure by the end of the first calendar year after the calendar year in which the CPA Exam is passed is 40 hours.

Requirements for CPE are found in VBOA regulations [18VAC5-22-90](#) and [18VAC5-22-140](#) and in the chart below.

Status	Calendar Year (CY)	Total Hours Required	Minimum Hours Required	Virginia-Specific Ethics (Included in Total Hours)	CPE Related to Providing Attest, Compilation, or Financial Statement Preparation Services (Included in Total Hours)
Applying for Initial License					
Licensure Applicant	CY of Passing Exam	0 Hours	0 Hours	Not Applicable	Not Applicable
	1st CY After Exam	40 Hours	40 Hours	2 Hours/CY	Not Applicable
	2nd CY After Exam	80 Hours	80 Hours	2 Hours/CY	Not Applicable
	3rd CY (or More) After Exam	120 Hours	120 Hours	2 Hours/CY	Not Applicable
Licensed					
Active Licensee	CY of Initial License	0 Hours	0 Hours	Not Applicable	Not Applicable
	Any 3-CY Reporting Cycle	120 Hours/3 Years	20 Hours/CY	2 Hours/CY	8 Hours (Only if Releasing or Authorizing Release of Reports)
Reinstatement of License					
Inactive/Expired/Voluntarily Surrender	Current CY	120 Hours	120 Hours	2 Hours/CY	Not Applicable

The VBOA uses a rolling three calendar-year period to determine CPE compliance. This period includes the three calendar years **prior** to the current calendar year. Licensees should not submit CPE documentation during the annual renewal process unless specifically asked by the VBOA. However, CPE documentation must be retained for the four calendar years preceding the current calendar year.

The VBOA recognizes that 50 minutes of CPE participation equals 1 hour of CPE credit.

CPE requirements may be adjusted depending upon when a Virginia CPA begins or ceases to provide services to the public or on behalf of an employer.

Licensees who do not work and/or volunteer in positions that require the use of accounting, financial, tax or other skills deemed relevant by the VBOA may apply for the Inactive status. If not approved for this status, licensees must still comply with the CPE requirements.

The deadline for obtaining CPE for the previous year is January 31.

What qualifies?

The VBOA accepts CPE obtained through a variety of forums, providing that the licensee can demonstrate that learning objectives were met. The VBOA does not currently require licensees to obtain CPE from specific or approved sponsors, except for the Virginia-Specific Ethics Course. However, all licensees, excluding those approved for the inactive status, are required to annually obtain two hours of a Virginia-Specific Ethics Course. In addition, individuals who release or authorize the release of reports on attest, compilation, or financial statement preparation services provided for persons or entities located in Virginia must obtain a minimum of eight hours annually of CPE related to attest, compilation, or financial statement preparation services.

A variety of CPE is acceptable, including:

- **Attending a seminar or educational conference.** Instructors must have up-to-date knowledge of the subject matter and use appropriate teaching materials. Attendance should be monitored in a manner that can be verified by the VBOA.
- **Earning course credit at an accredited college or university.** One semester-hour of credit for courses at an accredited college or university constitutes 15 hours of CPE and one quarter-hour of credit constitutes 10 hours of CPE.
- **Completing a course through nano-learning or incremental CPE.** Nano-learning is known as learning and absorbing information in smaller increments of time. The VBOA accepts nano-learning CPE.

- **Completing a self-study course.** Licensee must be able to demonstrate that learning objectives were met.
- **Making a presentation.** The licensee may present at a professional seminar, educational conference or classroom setting, provided that up-to-date knowledge of the subject matter is demonstrated and appropriate teaching materials are used. Repeat presentations may not be counted as additional CPE. During each 3-year period, a maximum of 30 hours for preparing and making presentations is allowable.
- **Producing written materials.** The topic must be relevant to providing services to the public or to or on behalf of an employer. The material is formally reviewed by an independent party and must be published in a book, magazine or similar publication.
- **CPE credit for certifications/exams/licensures.** The VBOA has approved CPE hours for passing exams and obtaining additional certifications for the following designations. The CPE hours must not exceed a total of 60 hours over a three-year rolling period.

The VBOA will determine on a case-by-case basis the acceptability of other forms of CPE.

The VBOA has also approved that Continuing Education (CE), Continuing Education Units (CEU), Continuing Legal Education (CLE), Continuing Medical Education (CME), Quality Assurance Service (QAS) and semester and quarter-hour credits are acceptable as CPE credits.

Documentation requirements

Required CPE documentation includes:

- Certificates of completion from the CPE sponsor, including the sponsors' name, participant's name, course/content name, date taken and CPE hours earned.
- Official transcript of the college or university for earning course credit at an accredited institution.
- Syllabus/agenda and signed statement indicating the length of the presentation when making a presentation.
- Copy of published article, book or written material (or proof of publication) when producing written material used by individuals who provide services to the public or to or on behalf of an employer.
- The VBOA has restrictions on the types of documentation it regards as acceptable. The VBOA will not accept receipts, registration confirmations, cancelled checks,

outlines, PowerPoint presentations or sign-in sheets, etc., as valid CPE documentation.

Sponsors providing CPE

The VBOA does not maintain agreements with sponsors, pre-qualify sponsors or individual courses, or require a licensee to obtain CPE from specific sponsors (except for the Virginia-Specific Ethics Course). However, sponsors are encouraged to comply with the Statement on Standards for CPE Programs issued jointly by the AICPA and NASBA. All sponsors should be familiar with [VBOA Policy #2](#).

CPE reciprocity

If a CPA holds an active license in another state and their principal place of business is not located in Virginia, they are eligible for CPE reciprocity. If a CPA meets the CPE requirements in their home state, the VBOA will accept this as CPE compliant in Virginia. However, a CPA must take either an ethics course of at least two hours that conforms with VBOA requirements or an ethics course acceptable to the board of accountancy of another state in which the CPA holds the license.

The CPA must select “CPE reciprocity” during the CPE audit process to be eligible for this exemption.

Substantial equivalency was developed to allow licensed CPAs to practice across jurisdictions more easily. Visit the [NASBA website to view jurisdictions substantially equivalent to Virginia](#).

CPE deficiencies

A licensee may determine on their own that they have a CPE deficiency for a specific reporting period. The licensee should self-report and notify cpe@boa.virginia.gov immediately when they determine a deficiency has occurred.

Any questions regarding CPE can be sent to cpe@boa.virginia.gov.

NASBA CPE Audit Service

The VBOA, in cooperation with the [National Association of State Boards of Accountancy](#) (NASBA), offers the [CPE Audit Service](#) for all active Virginia CPAs. This system is available to CPAs at no charge and allows CPAs to keep track of and store all CPE records in one location.

In May 2019, NASBA transitioned from the previous CPE Tracking System to the new CPA Audit Service for individual CPAs. For CPAs who used the previous CPE Tracking System, all historical data, including past course and attendance records, has been transitioned to the new system. When the CPE Audit Service launched, CPAs received an email containing information to register a new account in the new system. Access information was included in the first registration email.

The CPE Audit Service system includes video tutorials that focus on new features and the most commonly used components. The videos are easy to follow and include step-by-step instructions on how to upload CPE certificates, enter the information and submit it to the VBOA. CPAs who are selected for a CPE audit are required to use this system to submit CPE records and documentation to the VBOA. Use of this system does not reflect a final determination of CPE compliance. The VBOA has the final authority on the acceptance of individual courses and documentation for CPE credit.

For questions regarding the system, please contact the VBOA at cpe@boa.virginia.gov or (804) 367-1568. For questions regarding registration or trouble accessing an account, please contact NASBA directly through the help line at (844) 273-8722 or CPEauditservice@nasba.org.

FIRM LICENSURE & PEER REVIEW

Firm license

A firm CPA license is required to provide attest, compilation or financial statement preparation services to persons or entities located in Virginia. Similar to the individual CPA license, firms may operate under the CPA firm license of another state or jurisdiction if the principal place of business is not Virginia. Requirements for firm licensure include:

- Pay the non-refundable \$100 firm license application fee.
- At least 51% of the owners and the voting equity interest of the firm must be CPAs or trustees of an eligible employee stock ownership plan. Owners of a firm who are not licensees must participate in the firm's activities on a regular, continual and substantial basis.
- An individual who releases or authorizes the release of reports on attest services, compilation services, or financial statement preparation services must obtain a minimum of 8 hours annually of CPE related to attest services, compilation services, or financial statement preparation services.
- Firms must provide that persons who release or authorize the release of reports on attest services, compilation services, or financial statement preparation services possess competencies that include:
 - Required technical proficiency.
 - Familiarity with the industry and the person or entity.
 - Skills that indicate sound professional judgment.
 - Other competencies necessary under the circumstances.
- The firm must conduct its attest services, compilation services, or financial statement preparation services in conformity with the standards of conduct and practice.
- The firm may be enrolled in a monitoring program of the American Institute of Certified Public Accountants or another VBOA-approved monitoring program.
- The firm's name must not be false, misleading or deceptive.
- All firms applying for CPA licensure must provide a copy of their certificate of incorporation or organization from the Commonwealth of Virginia's [State Corporation Commission](#). Sole proprietors are exempt from this requirement.

Find all requirements for firms online on the VBOA's website at <https://boa.virginia.gov/firms/requirements/>.

Firm reciprocity

Any firm whose principal place of business is not located in Virginia is not required to hold a Virginia firm CPA license.

Firms not required to obtain a Virginia license may provide attest services, compilation services, or financial statement preparation services to Virginia persons or entities if the firm is lawfully able to provide these services in the state where their principal place of business is located. Firm personnel who work on the engagement must either hold a Virginia license or hold a substantially equivalent license from another state. Firms must also comply with statutory requirements concerning firm ownership, firm names and practice monitoring.

Peer review

Pursuant to [§ 54.1-4412.1, D.6](#) of the Code of Virginia, Virginia CPA firms are required to enroll in a peer review program if they provide attest and/or compilation services. If the firm's highest level of service provided is financial statement preparation services, enrollment in peer review is not required. However, if a firm is enrolled in peer review and performs financial statement preparation services, those services will be included within the scope of the peer review. Currently, all firms required to undergo peer review must be enrolled in the AICPA's Peer Review Program through an approved administering entity to fulfill this requirement.

Pursuant to Board Regulation [18VAC5-22-150](#) and [§ 54.1-4412.1](#) of the Code of Virginia, a firm must comply with all components of the monitoring program in which it is enrolled, except that, depending on the facts and circumstances, the VBOA may waive the requirement for a peer review or grant additional time for complying with the requirement.

Licensed Virginia CPA firms will be selected for a compliance review of their peer review as a component of any open investigation (enforcement case), or in situations where the VBOA believes that a peer review compliance review is warranted.

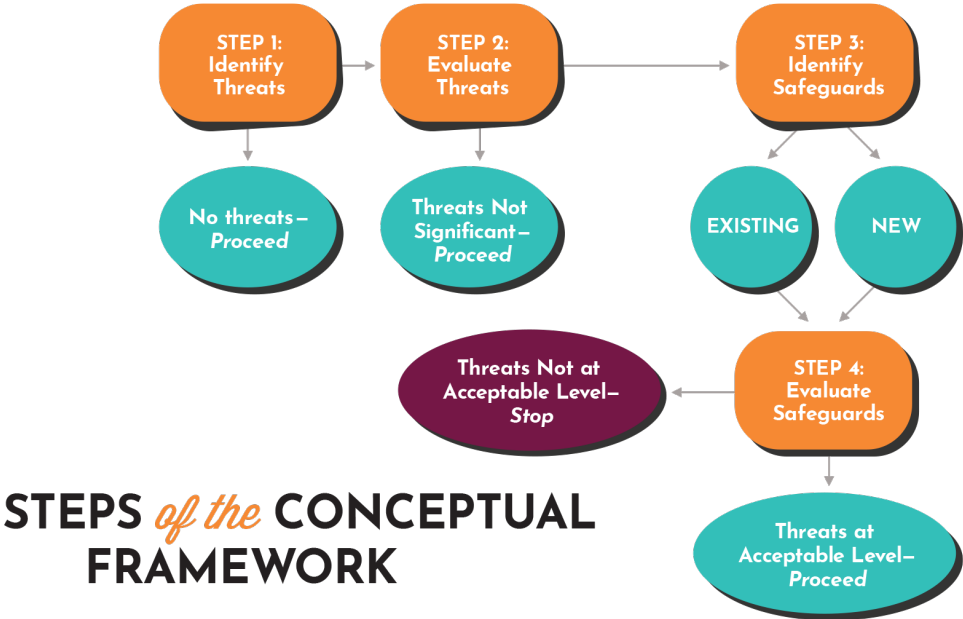
CODE OF PROFESSIONAL CONDUCT

The CPA license implies objectivity, integrity and sound professional judgment. The public has the expectation that this is what they will be getting when working with CPAs. Along with that expectation come laws, codes, rules, regulations and policies enacted to motivate proper behavior and punish improper behavior on the part of CPAs. At our foundation, we are a profession guided by these laws, and compliance with them is our minimum bar for ethical behavior.

However, the public also has the expectation that we will not only comply with the law but also act in a way that is morally acceptable. Situations may arise that laws, codes, rules, regulations and policies cannot adequately address. There can't possibly be a one-size-fits-all solution for every situation, but with the proper toolkit, we can be better equipped to move beyond black-and-white compliance and navigate the gray area that so often exists when it comes to ethical decision-making.

The AICPA provides conceptual frameworks for members in public practice and members in business to apply when assessing their compliance with the Code of Professional Conduct in a particular situation. The conceptual framework approach recognizes that the Code cannot possibly address every conceivable situation and provides a formalized process to apply professional judgment that may be required. The conceptual framework provides guidance on identifying, evaluating and addressing threats to compliance with the rules that results from a relationship or circumstance not otherwise addressed in the Code.

The following are the steps of the conceptual framework:



- **Step 1:** Identify threats to compliance with the rules. If no threats, then proceed with service. If threats are identified, proceed to Step 2.
- **Step 2:** Evaluate the significance of the threats to determine whether the threats are at an acceptable level. If threats are at an acceptable level, then proceed with service. If threats are not at an acceptable level, proceed to Step 3.
- **Step 3:** Identify safeguards that can be applied. Safeguards can be existing safeguards or new safeguards.
- **Step 4:** Evaluate the safeguards to determine if they eliminate or reduce threats to an acceptable level. Where you conclude that threats are at an acceptable level after applying safeguards, proceed with service. In some cases, an identified threat may be so significant that no safeguards will eliminate it or reduce it to an acceptable level or you may be unable to implement effective safeguards. Under such circumstances, providing the specific professional services would compromise your compliance with the rules and you would need to determine whether to decline or discontinue the professional services or resign from the engagement.

The first step is to identify threats. Ask yourself, “Does this relationship or circumstance create a threat to complying with the rules?” If yes, the significance of the threat needs to be evaluated in the second step.

In the second step, evaluate threats. Ask yourself if the threat is at an acceptable level. A threat is at an acceptable level when a reasonable, informed third party who is aware of the relevant information would be expected to conclude that the threat would not compromise compliance with the rules. Consider both qualitative and quantitative factors when evaluating the significance of a threat. If you conclude that a reasonable, informed third party who is aware of the relevant information would be expected to conclude that the threat would not compromise compliance with the rules, then the threat is at an acceptable level and no further evaluation is required. If you conclude that the threat is not at an acceptable level, then you need to proceed to the third step.

The third step is to identify safeguards. Ask yourself what safeguards are in place or could be put in place. When identifying safeguards, remember that one safeguard might eliminate or reduce several threats. However, it might also be necessary to identify several safeguards to eliminate or reduce just one threat. After you have identified new and existing safeguards, proceed to the fourth step.

In the fourth step, evaluate safeguards. Ask yourself if the safeguards eliminate or reduce the threat to an acceptable level. If they do, no further action is required. If they do not, providing the specific professional services would compromise your compliance with the rules and you would need to determine whether to decline or discontinue the professional services or resign from the engagement.

It is important to note that the conceptual framework only applies when no guidance in the Code exists. Failure to use the conceptual framework under those circumstances would constitute a violation of the Code. However, the conceptual framework cannot be used to override existing requirements or prohibitions specifically addressed in the Code.

When the member applies safeguards to eliminate or reduce significant threats to an acceptable level, the member should document the identified threats and safeguards applied. Failure to prepare this documentation would be considered a violation of the “Compliance With Standards Rule.”

Conceptual frameworks for members in public practice and members in business

The Code provides conceptual frameworks for members in public practice and members in business that are designed to help members analyze relationships and circumstances applicable to their line of work.

Step 1 of each framework is to identify threats. Many threats fall into one or more of seven broad categories: adverse interest, advocacy, familiarity, management participation, self-interest, self-review and undue influence. Each framework provides definitions and examples of these threats as applicable to members in public practice and members in business.

Definitions and selected examples are provided below. You can refer to the Code for the full list of examples.

	Members in public practice	Members in business
Adverse interest threat	<p>The threat that a member will not act with objectivity because the member’s interests are opposed to the client’s interests.</p> <p>Example: The client has expressed an intention to commence litigation against the member.</p>	<p>The threat that a member will not act with objectivity because the member’s interests are opposed to the interests of the employing organization.</p> <p>Example: A member has charged or expressed an intention to charge the employing organization with violations of law.</p>

Advocacy threat

The threat that a member will promote a client's interests or position to the point that his or her objectivity or independence is compromised.

Example: A member provides forensic accounting services to a client in litigation or a dispute with third parties.

The threat that a member will promote an employing organization's interests or position to the point that his or her objectivity is compromised.

Example: Obtaining favorable financing or additional capital is dependent upon the information that the member includes in or excludes from, a prospectus, an offering, a business plan, a financing application or a regulatory filing.

Familiarity threat

The threat that, due to a long or close relationship with a client, a member will become too sympathetic to the client's interests or too accepting of the client's work or product.

Example: A member's immediate family or close relative is employed by the client.

The threat that, due to a long or close relationship with a person or an employing organization, a member will become too sympathetic to their interests or too accepting of the person's work or employing organization's product or service.

Example: A member uses an immediate family's or a close relative's company as a supplier to the employing organization.

Management participation threat

The threat that a member will take on the role of client management or otherwise assume management responsibilities, which may occur during an engagement to provide non-attest services.

N/A

Self-interest threat

The threat that a member could benefit, financially or otherwise, from an interest in or relationship with a client or persons associated with the client.

Example: The member has a financial interest in a client and the outcome of a professional services engagement may affect the fair value of that financial interest.

The threat that a member could benefit, financially or otherwise, from an interest in or relationship with the employing organization or persons associated with the employing organization.

Example: A member's immediate family or close relative has a financial interest in the employing organization.

Self-review threat

The threat that a member will not appropriately evaluate the results of a previous judgment made or service performed or supervised by the member or an individual in the member's firm and that the member will rely on that service in

The threat that a member will not appropriately evaluate the results of a previous judgment made or service performed or supervised by the member or an individual in the employing organization and that the member will rely on that

forming a judgment as part of another service.

Example: The member relies on the work product of the member's firm.

service in forming a judgment as part of another service.

Example: When performing an internal audit procedure, an internal auditor accepts work that he or she previously performed in a different position.

Undue influence threat

The threat that a member will subordinate his or her judgment to an individual associated with a client or any relevant third party due to that individual's reputation or expertise, aggressive or dominant personality or attempts to coerce or exercise excessive influence over the member.

Example: The firm is threatened with dismissal from a client engagement.

The threat that a member will subordinate his or her judgment to that of an individual associated with the employing organization or any relevant third party due to that individual's position, reputation or expertise, aggressive or dominant personality or attempts to coerce or exercise excessive influence over the member.

Example: A member is pressured to become associated with misleading information.

Remember, after you identify threats, you must then evaluate threats, as dictated by Step 2.

Step 3 of each framework is to identify safeguards. Each framework provides categories and examples of these safeguards as applicable to members in public practice and

members in business. Categories and selected examples are provided below. You can refer to the Code for the full list of examples.

Members in public practice

Safeguards that may eliminate a threat or reduce it to an acceptable level for members in public practice fall into three broad categories:

Safeguards created by the profession, legislation or regulation

Examples:

- Education and training requirements on independence and ethics rules.
- Continuing education requirements on independence and ethics.
- Professional standards and the threat of discipline.

Safeguards implemented by the client

(Note: It is not possible to rely solely on safeguards implemented by the client to eliminate or reduce significant threats to an acceptable level).

Examples:

- The client has personnel with suitable skill, knowledge or experience who make managerial decisions about the delivery of professional services and makes use of third-party resources for consultation as needed.
- The tone at the top emphasizes the client's commitment to fair financial reporting and compliance with the applicable laws, rules, regulations and corporate governance policies.
- Policies and procedures are in place to achieve fair financial reporting and compliance with the applicable laws, rules, regulations and corporate governance policies.

Safeguards implemented by the firm, including policies and procedures to implement professional and regulatory requirements

Examples:

- Firm leadership that stresses the importance of complying with the rules and the expectation that engagement teams will act in the public interest.
- Policies and procedures that are designed to implement and monitor engagement quality control.
- Documented policies regarding the identification of threats to compliance with the rules, the evaluation of the significance of those threats and the identification and

application of safeguards that can eliminate identified threats or reduce them to an acceptable level.

Members in business

Safeguards that may eliminate a threat or reduce it to an acceptable level for members in business fall into two broad categories:

Safeguards created by the profession, legislation or regulation

Examples:

- Education and training requirements on ethics and professional responsibilities.
- Continuing education requirements on ethics.
- Professional standards and the threat of discipline.

Safeguards implemented by the employing organization

Examples:

- A tone at the top emphasizing a commitment to fair financial reporting and compliance with applicable laws, rules, regulations and corporate governance policies.
- Policies and procedures addressing ethical conduct and compliance with laws, rules and regulations.
- Audit committee charter, including independent audit committee members.

Remember, after you identify safeguards, you must then evaluate safeguards, as dictated by Step 4.

Independence conceptual framework

The Code also contains an independence conceptual framework and states:

“It is impossible to enumerate all relationships or circumstances in which the appearance of independence might be questioned. Thus, in the absence of an independence interpretation that addresses a particular relationship or circumstance, a member should evaluate whether that relationship or circumstance would lead a reasonable and informed third party who is aware of the relevant information to conclude that there is a threat to either the member’s or firm’s independence or both, that is not at an acceptable level. When making that evaluation, a member should apply the conceptual framework approach as outlined in this interpretation to analyze independence matters.

The conceptual framework approach entails identifying threats and evaluating the threat that the member would not be independent or would be perceived by a reasonable and informed third party who is aware of the relevant information as not being independent. The member must eliminate or reduce that threat to an acceptable level to conclude that the member is independent. Threats are at an acceptable level either because of the types of threats and their potential effect or because safeguards have eliminated or reduced the threat, so that a reasonable and informed third party who is aware of the relevant information would perceive that the member's professional judgment is not compromised."

The framework provides definitions and examples of threats as applicable to independence. It also provides categories and examples of safeguards as applicable to independence.

AICPA Resources

The AICPA offers several additional resources to help you as you navigate situations in your professional career as a CPA.

Ethics Hotline

- 1-888-777-7077 (select option 2, then 3) or email ethics@aicpa.org

Online Professional Ethics Library

- <https://pub.aicpa.org/codeofconduct/Ethics.aspx>
 - AICPA Code of Professional Conduct
 - Plain English Guide to Independence
 - Ethics Q&As

Professional Ethics Resources page

- <https://us.aicpa.org/interestareas/professionalethics/resources>
 - Toolkits
 - Practice aids
 - Implementation guides

Ethically Speaking podcast

- <https://ethicallyspeaking.libsyn.com>
 - Back to Basics series

Sources

[AICPA Conceptual Framework](#)

Goria, Ellen. [“Revised AICPA Code of Ethics ... What’s the Fuss?”](#) Journal of Accountancy. Feb. 1, 2014.

Goria, Ellen. [“User-Friendly AICPA Ethics Code on Horizon.”](#) Journal of Accountancy. April 17, 2013.

VOLUNTEERISM

You are done with school, you are done with exams, you have your license and you want to get involved with a charity or organization that means something to you. But you aren't sure what kind of role you can play with all the rules around practicing with a license. Don't worry. The VBOA developed an easy-to-follow guide and a list of questions you can ask yourself to make sure you're doing it right.

Based on input from licensees requesting additional clarification on the topic of the ability of Virginia CPAs to provide volunteer services to nonprofit entities and how such services may impact the license requirements of the CPA, the VBOA created a handbook. The book provides guidance to CPAs who are serving in volunteer roles and may be asked to provide services that may fall under Virginia accountancy statutes and regulations. A volunteer infographic is designed to visually help a licensee determine what services they can provide based on the level of service and a flowchart provides clear-cut examples. Both tools are intended to help Virginia CPAs better navigate the provision of volunteer services.

The most important question you must ask of yourself is, "What service is to be provided (for what service have I been engaged)?" CPAs should first consider whether the service being provided is an attest, compilation or preparation of financial statement service as those terms are defined by accounting standards. Often, nonprofits freely use terms like "audit" or "review" in manners different from those defined in accounting standards.

Next you must ask the question, "In what capacity will I be providing the service?" If the CPA is a volunteer, they may serve in many capacities, including as a governing board member, officer, committee member (e.g. finance or audit) or simply as a volunteer worker. However, when a CPA is serving as a volunteer, and in that volunteer capacity is asked to provide attest, compilation or financial statement preparation services, a careful review of both Virginia law and professional standards is required.

To help guide you through the important questions and answers, use the graphic below:

Type of service engaged to perform	Independent	Not Independent (Owners, officers, employees & members of governing body)	Not Independent Conflicts of interest (other than owners, officers, employees & members of governing body)
Audit, Review, Attestation	<ul style="list-style-type: none"> You must comply with technical standards, have a firm license and a peer review. The 8-hour A&A CPE requirement applies. 	<ul style="list-style-type: none"> You cannot provide audit, review or attestation services if not independent. 	<ul style="list-style-type: none"> You cannot provide audit, review or attestation services if not independent.
Compilation	<ul style="list-style-type: none"> You must comply with technical standards, have a firm license and a peer review. The 8-hour A&A CPE requirement applies. 	<ul style="list-style-type: none"> This is not a compilation service as defined by SSARS. 	<ul style="list-style-type: none"> You must comply with technical standards, have a firm license and a peer review. The 8-hour A&A CPE requirement applies.
Financial Statement Preparation Services	<ul style="list-style-type: none"> You must comply with technical standards and have a firm license. The 8-hour A&A CPE requirement applies. No peer review is needed if preparation is the highest form of service provided. Peer review is needed if preparation is not the highest form of service provided. 	<ul style="list-style-type: none"> This is not a financial statement preparation service as defined by SSARS. 	<ul style="list-style-type: none"> You must comply with technical standards and have a firm license. The 8-hour A&A CPE requirement applies. No peer review is needed if preparation is the highest form of service provided. Peer review is needed if preparation is not the highest form of service provided.
Consulting Services <ul style="list-style-type: none"> Accounting consultation Budget preparation assistance Fraud loss quantification Management consulting Other consulting engagements 	<ul style="list-style-type: none"> You do not have to comply with technical standards other than Consulting Services Standards. 		
Other Services <ul style="list-style-type: none"> General ledger maintenance Working trial balance preparation Bank reconciliation preparation Bookkeeping & payroll processing Tax returns preparation 	<ul style="list-style-type: none"> You do not have to comply with technical standards other than Tax Services Standards. 		
Other Services <p>Procedures that would be performed in connection with an attest service, but licensee has not been engaged to perform an attest service:</p> <ul style="list-style-type: none"> Bank reconciliation review Internal control review Inventory counts Other attest procedure Agreed-upon procedure of audit committee 	<ul style="list-style-type: none"> You do not have to comply with technical standards. 		

ENFORCEMENT

So, how many complaints does the VBOA actually receive each year? It is generally an average of 75 to 100 complaints, not including CPE violations.

Anyone can submit a complaint; this includes CPAs, clients, former clients, state or federal agencies or members of the public. Also, some complaints are initiated by the VBOA. A [complaint form](#) is available online at boa.virginia.gov.

The VBOA can't look into everything; their authority is restricted to violations of the Code of Virginia statutes and/or Board regulations. They do not investigate complaints that involve fee disputes, minor errors or mistakes.

Complaints must be received in writing and should specifically detail the issue with supporting documentation. In most cases, the accused party is made aware of the complaint as part of the investigation. That person will receive a copy of the detailed complaint and will have an opportunity to respond. The VBOA will also investigate an anonymous complaint, but it must receive enough information and supporting documents in order to do so.

The VBOA offers complainants assistance by providing checklists for filing complaints against both licensed and unlicensed CPAs and CPA firms. Those checklists are found on the VBOA website.

Where do complaints go from here? All information that indicates or alleges a possible violation of law or regulation is referred to the VBOA Enforcement Division. A preliminary investigation is conducted by reviewing reports and complaints to determine if there is a possible violation and if the VBOA has jurisdiction over the matter. If there's not enough evidence to substantiate a violation of a law or regulation, or if the VBOA does not have jurisdiction, the complaint is closed and the complainant is notified in writing. In those cases where another regulatory agency or body may have jurisdiction, the matter is also referred to that regulatory agency or body, as appropriate.

On the other hand, if it is determined that a violation of law or regulation may have occurred, a case is docketed for further investigation. The respondent and complainant are notified in writing, and an investigation is initiated.

It is the responsibility of the VBOA Enforcement Division to conduct an investigation by contacting the respondent and potential witnesses and by obtaining copies of relevant documents and other relevant evidence. The results are fully documented as a written report of the investigative findings and evidence, which is submitted for probable cause determination. Depending upon the nature of the allegation, probable cause review may be conducted by VBOA staff or by a Board member or Board designee.

Upon completion of the investigation and investigative report, a preliminary review is conducted to determine if probable cause exists and if charges should be issued against the respondent. To take disciplinary action against a licensee, the VBOA must have clear and convincing evidence that a violation of law or regulation has occurred. While one may believe that a licensee's action could be considered improper or otherwise deserving of corrective action, it may not always be a violation of law or regulation.

If probable cause is found, the result is typically to offer the respondent a Consent Order, or to issue a notice of Informal Fact-Finding Conference. If probable cause is not found, the complainant and the respondent are notified and the case is closed.

A Consent Order can be offered to the respondent if sanctions are deemed appropriate. A Consent Order is a potential resolution of the complaint proposed in writing to the CPA, CPA firm or unlicensed individual. If the respondent signs the Consent Order and fully agrees to the terms and conditions, the Consent Order is then brought before the full Board for approval. The Board can then accept or reject the Consent Order, in whole or in part. If the respondent chooses not to sign the order, they may elect to be heard at an administrative Informal Fact-Finding Conference.

Informal Fact-Finding (IFF) Conferences can happen based on the probable cause review recommendation or upon a request from the respondent. IFFs are an opportunity for the respondent to discuss the allegations stated in the notice and the evidence contained in the investigative file. In all disciplinary matters and proceedings, the burden of proof rests with the Commonwealth to establish clear and convincing evidence of a violation of law or regulation. An exception is cases involving applicants for initial licensure or reinstatement, who bear the burden of proof to establish evidence that they meet eligibility requirements and are safe and competent to practice.

Before the IFF convenes, the respondent will receive notice of the specific allegations and any information the Board will use to make a determination. The respondent can present factual data, an argument or proof of the facts and circumstances surrounding the alleged violation. The respondent may choose to be represented by counsel at the IFF. The complainant, if not anonymous, can attend the IFF if they choose, and witnesses who are Virginia residents can be subpoenaed.

Board members or Board designees participating in the IFF may be chosen based on their field of interest, their location or their representation of specific disciplines within the practice. One of the Board members will serve as the presiding officer for the IFF. Each of the Board members may ask questions regarding the allegations during the IFF.

IFFs are open to the public and will be posted on the Town Hall Commonwealth Calendar website prior to the meeting date.

Following the IFF, the Presiding Officer makes a recommendation to the full Board for consideration. The recommendation will include findings of fact, conclusions of law and any proposed disciplinary actions or sanctions. The respondent will receive a copy of the recommendation and a transcript of the proceedings. The Board can accept or reject the recommendations in whole or in part. The Final Opinion and Order are entered and signed by the Board chair and noted on the Respondent's record. The Final Opinion and Order is generally published on the VBOA website and in the newsletter. The respondent has 30 days to appeal the Board's final decision to the courts.

In some cases, following the IFF, in lieu of a Presiding Officer recommendation, the respondent may be offered a Consent Order to settle the matter. The respondent can choose to either sign or not. If signed, the Consent Order goes to the full Board for consideration. Consent Orders are generally approved at Board meetings, though a Board member can request it be discussed during a Closed Session. After approval, like the Final Opinion and Order, the Consent Order is noted on the Respondent's record, and is generally published on the VBOA website and in the newsletter.

Sometimes there will not be a Consent Order. Either the respondent is not offered one following the IFF, or the respondent will not sign it. If that happens, the presiding officer at the IFF will submit a recommendation to the full Board, and the respondent will receive that recommendation and the transcript of the proceedings. The Board is allowed to go into a closed session to deliberate if they choose. The Board will then publicly vote and make a final decision. The Board can accept, modify or reject the presiding officer's recommendation, and they can even remand the report back to an IFF for additional consideration.

The Final Opinion and Order are entered and signed by the Board chair and noted on the respondent's record and is generally published on the VBOA website and in the newsletter. The Final Opinion IS, however, subject to the administrative appeals process of Virginia.

And what about penalties? As you may know, the VBOA CAN impose penalties according to Virginia Code. These can range from a reprimand, accelerated peer reviews, satisfactory completion of additional or specific CPE, suspension or revocation of the Virginia individual CPA license or CPA firm license, loss of privilege to perform services in Virginia and/or a monetary penalty up to \$100,000 for each violation. Any monetary penalty collected goes right into the state literary fund and is not available to the VBOA as operating funds.

And, after everything is said and done, and the matter has been closed, the VBOA's investigation, findings, and any disciplinary action is available to the public under the [Virginia Freedom of Information Act](#).

The VBOA is required by statutory mandate to take appropriate action against individuals or firms to ensure the protection of the public. The general statutory mandate provides the

VBOA with the authority to investigate possible violations of a law or regulation and provides the VBOA with the authority to enforce these laws by revoking, suspending or restricting a license, or imposing other appropriate sanctions if a violation is proven. In addition to the general statutory mandates and the VBOA's laws and regulations, the disciplinary process is governed by the Virginia Administrative Process Act and by court decisions interpreting the same.

CONCLUSION

This brings us to the end of this course, but not to the end of your ethical journey. As a licensed CPA in the Commonwealth of Virginia, you will have to take an ethics course acceptable to the VBOA every year.

If there comes a time when you have a question or need clarification, please remember there are a whole host of resources at your fingertips. Listed below are just a few of the most important resources and links. And remember, the VBOA is there for you and can be called upon at any time.

We hope this course has provided you the foundation by which you can build a solid career and ethical network.

APPENDIX : ACRONYMS, GLOSSARY AND RESOURCES

Common acronyms & abbreviations

- AICPA — American Institute of CPAs
- ASU — Accounting Standards Update
- CAQ — Center for Audit Quality
- CPA — Certified Public Accountant
- CPE — Continuing Professional Education
- DOJ — U.S. Department of Justice
- EBPAQC — AICPA Employee Benefit Plan Audit Quality Center
- ET — Ethics (topical index of the AICPA Professional Code of Conduct)
- FAF — Financial Accounting Foundation
- FASB — Financial Accounting Standards Board
- FRF — Financial Reporting Framework
- FTC — U.S. Federal Trade Commission
- GAO — U.S. Government Accountability Office
- IESBA — International Ethics Standards Board for Accountants
- IFAC — International Federation of Accountants
- IQAB — International Qualification Appraisal Board
- IQEX – International Qualification Examination
- IRC — U.S. Internal Revenue Code
- IRS — U.S. Internal Revenue Service
- GAAP — Generally Accepted Accounting Principles
- GAAS — Generally Accepted Auditing Standards
- GAGAS — Generally Accepted Government Auditing Standards
- GAPP — Generally Accepted Privacy Principles
- NASBA — National Association of State Boards of Accountancy

- PCAOB — Public Company Accounting Oversight Board
- PCC — Private Company Council
- PEEC — AICPA Professional Ethics Executive Committee
- PIOB — Public Interest Oversight Board
- PTIN — Preparer Tax Identification Number
- SHRM — Society for Human Resource Management
- SME — Small- and medium-sized entities
- SPF — Special purpose framework (previously Other Comprehensive Basis of Accounting)
- SSAE — Statements on Standards for Attestation Engagements
- SSARS — Statements on Standards for Accounting and Review Services
- SQCS — Statement on Quality Control Standards
- SSTS — Statements on Standards for Tax Services
- VAC — Virginia Administrative Code (“Regulations”)
- VBOA — Virginia Board of Accountancy (“the Board”)
- VSCPA — Virginia Society of CPAs

Glossary of common terms

Assurance means any form of expressed or implied opinion or conclusion about the conformity of a financial statement with any recognition, measurement, presentation or disclosure principles for financial statements.

Attest services means audit, review or other attest services for which standards have been established by the Public Company Accounting Oversight Board (PCAOB), by the Auditing Standards Board or the Accounting and Review Services Committee of the American Institute of CPAs (AICPA), or by any successor standard-setting authorities.

Client means any person or entity, other than a CPA’s employer, that engages a CPA or CPA firm to perform professional services (engaging entity) and also a person or entity with respect to which a CPA or CPA firm perform professional services (subject entity). When the engaging entity and the subject entity are different, while there is only one engagement, they are separate clients. Source: AICPA Professional Ethics Committee December 2017 Official Release

Compilation services means compiling financial statements in accordance with standards established by the AICPA or by any successor standard-setting authorities. Cybersecurity means how a company protects itself against unauthorized use or access to electronic data.

Ethical communication means communication that furthers integrity and builds trust based on the idea of congruent words and actions.

Financial statement means a presentation of historical or prospective information about one or more persons or entities.

Licensee means a person or firm holding a Virginia license or the license of another state. However, for purposes of this document, licensee only refers to a person holding a Virginia license or the license of another state. Mobility means a practice privilege that generally permits a licensed CPA in good standing from a substantially equivalent state to practice outside of his or her place of business without obtaining another license. Source: cpamobility.org

Online presence means how we appear to clients, employers, colleagues, family, friends, the profession and the public at large on the Internet. It is the collective picture we present to the public through social media, blogs, websites and other Internet sources.

Owner-managed entities are closely held companies run by the individuals who own a controlling ownership interest; a stark contrast to public companies, which by definition have an obvious separation between ownership and the management. Source: AICPA's Financial Reporting Framework for Small- and Medium-sized Entities FAQ

Peer review means one of two types of reviews (system and engagement) of a firm's accounting and auditing practice conducted in accordance with the AICPA's practice monitoring program. A system review is a study and appraisal by an independent evaluator of a CPA firm's system of quality control to perform accounting and auditing work. An engagement review is a study and appraisal by an independent evaluator of a sample of a CPA firm's actual accounting work, including accounting reports issued and documentation prepared by the CPA firm, as well as other procedures that the firm performed.

Practice of public accounting means the giving of an assurance other than (i) by the person or persons about whom the financial information is presented or (ii) by one or more owners, officers, employees or members of the governing body of the entity or entities about whom the financial information is presented.

Professional judgment is the application of relevant training, knowledge and experience, within the context provided by auditing, accounting and ethical standards, in making informed decisions about the courses of action that are appropriate in the circumstances of the audit engagement.

Professional skepticism is an attitude that includes a questioning mind, being alert to conditions that may indicate possible misstatement due to fraud or error, and a critical assessment of audit evidence.

Providing services to the public means providing services that are subject to the guidance of the standard-setting authorities listed in the standards of conduct and practice in subdivisions 5 and 6 of § 54.1-4413.3.

§ 54.1-4413.3. Standards of conduct and practice. (5 and 6 only listed below.)

5. Follow the technical standards, and the related interpretive guidance, issued by committees and boards of the American Institute of Certified Public Accountants that are designated by the Council of the American Institute of Certified Public Accountants to promulgate technical standards, or that are issued by any successor standard-setting authorities.

6. Follow the standards, and the related interpretive guidance, as applicable under the circumstances, issued by the Comptroller General of the United States, the Federal Accounting Standards Advisory Board, the Financial Accounting Standards Board, the Governmental Accounting Standards Board, the Public Company Accounting Oversight Board, the U. S. Securities and Exchange Commission, comparable international standard-setting authorities, or any successor standard-setting authorities.

Providing services to an employer means providing to or on behalf of an entity services that require the use of accounting, financial, tax or other skills that are relevant, as determined by the Board.

Safeguards mean controls that eliminate or reduce threats to independence. Safeguards range from partial to complete prohibitions of the threatening circumstance to procedures that counteract the potential influence of a threat. The nature and extent of the safeguard to be applied depend on many factors, including the size of the firm and whether the client is a public interest entity. To be effective, safeguards should eliminate or reduce the threat to an acceptable level. Source: AICPA Code of Professional Conduct

Small- and medium-sized entities (SME). There is no standard definition in the United States or under the AICPA. Source: AICPA's Financial Reporting Framework for Small- and Medium-sized Entities FAQ

Substantial equivalency means that the education, CPA exam and experience requirements contained in the statutes and administrative rules of another jurisdiction are comparable to, or exceed, the education, CPA exam and experience requirements contained in Chapter 44 of Title 54.1 of the Code of Virginia and the Board of Accountancy Regulations. (18VAC5-22)

Threat means a circumstance that could impair independence. Whether independence is impaired depends on the nature of the threat, whether it would be reasonable to expect that the threat would compromise the CPA's professional judgment and, if so, the specific safeguards applied to reduce or eliminate the threat and the effectiveness of those safeguards. Source: AICPA Code of Professional Conduct

URL shortening cons are shortened versions purporting to link to a legitimate URL which instead redirect the victim to a website which steals his or her information.

Using the CPA title in Virginia means using "CPA," "Certified Public Accountant" or "public accountant" (i) in any form or manner of verbal communication to persons or entities located in Virginia or (ii) in any form or manner of written communication to persons or entities located in Virginia, including but not limited to the use in any abbreviation, acronym, phrase or title that appears in business cards, the CPA wall certificate, Internet postings, letterhead, reports, signs, tax returns or any other document or device. Holding a Virginia license or the license of another state constitutes using the CPA title.

Common resources

NASBA Statement on Standards for CPE Programs tinyurl.com/NASBACPESStandards

U.S. Comptroller General
gao.gov/cghome/index.html

Financial Accounting Foundation (FAF)
accountingfoundation.org

Federal Accounting Standards Advisory Board (FASAB)
fasab.gov
(2 02) 512-7350

Financial Accounting Standards Board (FASB)
fasb.org
(203) 847- 070 0
Codification: asc.fasb.org/

U.S. Government Accountability Office (GAO)
gao.gov
(202) 512-3000

Government Accounting Standards Board (GASB)
gasb.org
(203) 847- 070 0

U.S. Internal Revenue Service (IRS)

irs.gov

(866) 255- 0654

International Accounting Standards Board (IASB)

ifrs.org

(0)20 7246 6410

Public Company Accounting Oversight Board (PCAOB)

pcaobus.org

(202) 207-9100

Independence and Ethics Rules and Standards (including AICPA Code of Professional Conduct references): tinyurl.com/PCAOBStandards

U.S. Securities and Exchange Commission (SEC)

sec.gov

(888) 732-6585

[Link to Code of Virginia](#)

[Link to Regulations](#)

[Link to VBOA](#)

[Link to VBOA Policies](#)

[Link to Virginia Town Hall](#)

[Link to Providing Volunteer Services as a Virginia CPA](#)

[Link to AICPA](#)

[Link to Code of Professional Conduct](#)

[Link to JoA](#)

[Link Ethically Speaking podcast](#)

[Link to VSCPA](#)

[Link to VSCPA Ethics Resource Page](#)