



National Association of State Boards of Accountancy

150 Fourth Avenue North ♦ Suite 700 ♦ Nashville, TN 37219-2417 ♦ Tel 615/880-4200 ♦ Fax 615/880/4290 ♦ Web www.nasba.org

January 23, 2013

Dr. Jerry Trapnell, Special Advisor to the President of AACSB International
The Association to Advance Collegiate Schools of Business
777 South Harbour Island Blvd, Suite 750
Tampa, FL 33602-5730

Dear Dr. Trapnell:

The National Association of State Boards of Accountancy (NASBA) and the NASBA Education Committee (Committee) commends the Blue Ribbon Committee (BRC) on its work revising both the Business and Accounting Accreditation Standards, particularly on its efforts, following ACAP and coinciding with the Pathways Commission, to bring academicians and the accounting profession closer together. Additionally, the Committee appreciates the opportunity to offer comments to AACSB International concerning the Exposure Draft Accounting Accreditation Standards (November 15, 2012). Generally, our comments center around Standard A9: Faculty Professional Credentials, General Criteria F: Ethical Behavior and Sustainability, and Standard A10: Accounting Faculty Qualifications and Engagement/Professional Interactions.

Standard A9: Faculty Professional Credentials

The Committee commends the BRC on this standard which emphasizes the importance of a faculty's commitment to the accounting profession, the role the professional accountant can play in keeping the program's curriculum relevant, and the need to bring the academician and the professional closer together.

General Criteria F: Ethical Behavior and Sustainability

The Committee is confused about the relevance of Sustainability as an AACSB Core Value or as a requirement for accounting program accreditation. As a concern about accounting program's sustainability, isn't this already addressed in General Criteria B: Oversight, Sustainability and Continuous Improvement? For the AACSB to require that an accounting program recycle or have LEED certified facilities seems to overreach its purpose, to ensure a quality accounting education. Additionally, the inclusion of sustainability with ethics, one of the most crucial components of the Core Values, may dilute its importance because it is much easier to document that a program recycles than it is to develop and document in-place systems to ensure ethical behaviors.

Standard A10: Accounting Faculty Qualifications and Engagement/Professional Interactions

The BRC is to be commended on its expansion of the traditional Academically Qualified and Professional Qualified classifications. However, to require that 40% of the faculty must be Research Academics is not consistent with the AACSB's policy that the faculty and the research should be mission driven. The Committee suggests that this 40% requirement be extended to include the Applied Academic, with a comment that the mixture should be based on the accounting program's mission.

Additionally, the Committee suggests more information or specificity about the qualifications of the classifications. For example, over the past several years, Masters of Tax (MT), Juris Doctor (JD) and Master of Law (LLM) could be considered as Academically Qualified if the faculty member had just graduated or was conducting and publishing academic research. However, the proposed standards do not address these

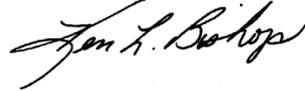
qualifications or even refer to them. Therefore, the Committee asks that more direction be given in this area if only in the form of examples.

Again, NASBA and its Education Committee commend the BRC's efforts and appreciate this opportunity to comment.

Respectfully,



Gaylen R. Hansen, CPA
NASBA Chair



Ken L. Bishop
President and CEO