

Unified Regulatory Plan of the Virginia Board of Accountancy for State Fiscal Year 2026

Prepared on May 27, 2025

Agency Summary

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 certified public accountants (CPA) and CPA firms. VBOA is authorized to qualify and issue CPA licenses to persons and firms to use the CPA title and practice public accountancy in the Commonwealth; to establish requirements for education, experience and examination for licensure; to establish requirements for the renewal or reinstatement of licenses; to establish requirements for CPA firm peer reviews; to establish continuing professional education requirements for the issuance, renewal or reinstatement of a license; to levy and collect fees sufficient to cover all expenses of the board; to initiate or receive complaints concerning licensed CPAs, CPA firms or unlicensed individuals or firms in the Commonwealth; to take disciplinary action if warranted; to set standards of practice for professional conduct; and to promulgate regulations for those purposes. Code of Virginia, Title 54.1, Chapter 44.

VBOA operates under the supervision of the Secretary of Finance and the 7-member board.

Action/Stage or Guidance Document Forum ID (if available) Action 6698 / Stage 10688	
Title of Proposed Regulatory Action or Guidance Document Amendments to Education, Experience, and Substantial Equivalency Requirements	
Brief Overview The 2025 General Assembly session directed VBOA to promulgate an emergency regulatory change concerning a new CPA licensure pathway and practice privilege. Chapters 523 and 539 (2025 Acts of Assembly) require regulations to be promulgated by the VBOA to modify 18VAC5-22-70 (Education), 18VAC5-22-100 (Experience), 18VAC5-22-110 (Demonstrating that a person's education, CPA examination, and experience are substantially equivalent to the requirements for obtaining a Virginia...), and 18VAC5-22-120 (Supervision of firm personnel). This provides pathways that reduce the number of required education hours and provides different pathways to licensure.	
Regulatory Stage (check one box)	☐ NOIRA ☐ Proposed ☐ Final ☒ Emergency or Emergency/NOIRA ☐ Revised Proposed ☐ Fast-Track
Additional Description	☐ Expedited Review Requested ☐ Exempt Action ☐ Guidance Document
Legal Authority	☐ Action required by federal statute ☒ Action required by state statute ☐ Discretionary Action
Deregulatory Component	The new licensure pathway is anticipated to decrease financial burdens associated with barriers to entry for CPA candidates.
Expected Date	Submitted April 2025, effective date July 2025

Action/Stage or Guidance Document Forum ID (if available) Action 6697 / Stage 10687	
Title of Proposed Regulatory Action or Guidance Document Amendments to Fee Structure, Firm Ownership, and Principal Place of Business	
Brief Overview VBOA anticipates revising 18VAC-22-20 (Fees) to create a more dynamic fee schedule and be able to fully fund expenditures while maintaining a minimum contingency fund (§§54.1-4405 and 54.1-4405.1). The renewal fees for individuals and firms increased by \$15 each, however the board also approved eliminating 5 fees primarily associated with exam and license applications and reducing 3 fees related to enforcement actions. VBOA also anticipates revising 18VAC-22-50 (Determining whether the principal place of business of a person or of a firm is in Virginia) to clarify whether an individual or firm should qualify Virginia as their principal place of business. Minor modifications to 18VAC5-22-80 (Examination) and 18VAC5-22-130 (Owners of firms who are not licensees) are being considered to clarify CPA re-exam and firm licensee requirements, respectively. VBOA is repealing 18VAC5-22-30 eliminate redundancy.	
Regulatory Stage (check one box)	☒ NOIRA ☐ Proposed ☐ Final ☐ Emergency or Emergency/NOIRA ☐ Revised Proposed ☐ Fast-Track
Additional Description	☐ Expedited Review Requested ☐ Exempt Action ☐ Guidance Document
Legal Authority	☐ Action required by federal statute ☐ Action required by state statute ☒ Discretionary Action
Deregulatory Component	Modifications to the fee structure would eliminate fees associated with individual and firm licenses. Modifications to the CPA re-exam requirements will decrease time burdens for CPA candidates.
Expected Date	Submitted for review in February 2025; published in Virginia Register in June 2025, with comment period ending July 2025