RULE IMPACT STATEMENT

TITLE 10. OKLAHOMA ACCOUNTANCY BOARD
CHAPTER 15. LICENSURE AND REGULATION OF ACCOUNTANCY
EMERGENCY RULES

Brief Description of the Purpose of the Proposed Rules:

These emergency rules implement House Bill 4317 (2026), which amended the Oklahoma Accountancy Act, 59 O.S. § 15.1 et seq., to create an additional pathway to CPA licensure and to simplify the process for obtaining a reciprocal certificate. HB4317 takes effect November 1, 2026. Because the standard permanent rulemaking process cannot be completed before that effective date, the Board is promulgating these rules on an emergency basis, pursuant to the Oklahoma Administrative Procedures Act, so that Board rules are consistent with the statute on the date it becomes effective and applicants are not left without clear, workable rules governing the new licensure and reciprocity requirements.

Pathway to Licensure (10:15-3-2 and 10:15-18-4): HB4317 adds a new pathway to licensure based on a bachelor's degree plus the CPA exam plus two years of supervised work experience, alongside the Board's existing pathways (master's degree or bachelor's degree plus 30 credit hours, each paired with the CPA exam and one year of work experience). Consistent with this legislative change, the Board removed the specific hour counts (120/150 semester hours) and the "two-year" and "four-year" college or university distinctions from its educational-requirement rules, and instead refers generally to a bachelor's degree or its equivalent from an accredited college or university. This mirrors the Uniform Accountancy Act (UAA). The rules also amend the experience requirement so that, rather than referencing a flat 1,800-hour figure, the rule refers to the number of years of experience required by statute, while clarifying that one year of experience equals 1,800 hours.

Reciprocity (10:15-21-1): HB4317 simplifies the reciprocal application process for CPAs licensed in states the Board has deemed substantially equivalent to Oklahoma. Rather than the five-option process that currently applies to all reciprocal applicants, a CPA from a substantially equivalent state need only provide: (1) an Authorization for Interstate Exchange of Examination and Licensure Information form or its equivalent, or a current letter of good standing from the original licensing jurisdiction; (2) evidence of successful completion of the AICPA ethics examination or its equivalent; and (3) evidence, as established under 59 O.S. § 15.9, substantiating good character (which includes a fingerprint-based national criminal background check). The prior five-option process is retained for applicants from jurisdictions the Board has not deemed substantially equivalent. At this time, all states are considered substantially equivalent. The rule also includes a grandfather provision so that a CPA licensed in a jurisdiction that was substantially equivalent at the time of that CPA's initial licensure, but which later loses that status, may still use the simplified process.

Description of the classes of persons who most likely will be affected by the proposed rules, including classes that will bear the costs of the proposed rules, and any information on cost impact received by the agency from any private or public entities:

The rules will affect prospective CPA candidates pursuing licensure in Oklahoma, licensees seeking a reciprocal Oklahoma certificate, and colleges and universities whose accounting graduates apply for Oklahoma licensure. Overall this should lower barriers and increase access to the profession.

The Board has not received a cost impact statement from any private or public entity regarding these changes.

Description of the classes of persons who will benefit from the proposed rule:

- Prospective CPA candidates will benefit from an additional pathway to licensure that does not require a graduate degree or 150 credit hours, helping to address Oklahoma's ongoing CPA workforce shortage. Candidates who choose the new bachelor's-degree pathway will be able to take advantage of using work experience in lieu of additional coursework to be licensed. This should reduce overall costs to the candidate and lower barriers to entry.
- Oklahoma employers, including public accounting firms, businesses, and government entities, will benefit from an expanded pipeline of licensure-eligible candidates.

- CPAs licensed in other substantially equivalent states will benefit from a simplified, less burdensome reciprocal application process. This will improve overall processing time and reduce applicant confusion.
- The public will benefit from having an increase in the number of CPAs available to perform professional services. This is essential for a well-functioning economy.
- Colleges and universities will be able to consider 90-hour bachelor degrees without having to be concerned about Board acceptance.

Description of the probable economic impact of the proposed rule upon affected classes of persons or political subdivisions, including a listing for all fee changes and, whenever possible, separate justification for each fee change:

The Board anticipates a positive economic impact upon affected classes of persons. We do not expect an impact on political subdivisions. The Board expects the new pathway and simplified reciprocity process to increase the number of licensure and reciprocal applicants due to increased opportunities for licensure and an easier administrative process. The rule changes should reduce overall applicant costs in both time and money.

The rules do not create or change any fees.

The probable costs and benefits to the agency and to any other agency of the implementation and enforcement of the proposed rule, the source of revenue to be used for implementation and enforcement of the proposed rule, and any anticipated effects on state revenues, including a projected net loss or gain in such revenues if it can be projected by the agency:

No significant costs are anticipated in implementing these emergency rules. The Board does not project any net loss or material net gain in state revenue as a result of these rules, beyond the possible modest increase in application volume described above.

A determination of whether implementation of the proposed rule will have an economic impact on any political subdivision or require their cooperation in implementing or enforcement the rule:

No economic impact on any political subdivision is anticipated, and no political subdivision will be required to cooperate in implementing or enforcing these rules.

A determination of whether implementation of the proposed rule may have an adverse economic effect on small business as provided by the Oklahoma Small Business Regulatory Flexibility Act:

No adverse economic impact on small business is anticipated. To the contrary, small accounting firms, which often face the greatest difficulty recruiting and retaining CPAs, are expected to benefit from the expanded pool of licensure-eligible candidates created by the new pathway.

An explanation of the measures the agency has taken to minimize compliance costs and a determination of whether there are less costly or non-regulatory methods or less intrusive methods for achieving the purpose of the proposed rule:

The Board drafted these rules to conform with the statutory language of HB4317 and minimize the compliance burden on candidates and applicants. The Board also looked to reduce the likelihood that Oklahoma's requirements diverge from those of other jurisdictions. The Board adopted an "either/or" documentation option for reciprocal applicants (Interstate Exchange form or letter of good standing) specifically to reduce the compliance burden for applicants.

A determination of the effect of the proposed rule on the public health, safety and environment and, if the proposed rule is designed to reduce significant risks to the public health, safety and environment, an explanation of the nature of the risk and to what extent the proposed rule will reduce the risk.

The proposed rules are not expected to have an adverse effect on public health, safety, or the environment.

Emergency Basis for the Proposed Rule:

House Bill 4317 becomes effective November 1, 2026, and the standard permanent rulemaking process, including the required legislative session for final adoption, cannot be completed before that date. Absent emergency rules, the Board's existing rules on educational requirements, experience requirements, and reciprocity would be inconsistent with the amended statute upon its effective date, creating uncertainty for candidates, licensees, and Board staff. The Board therefore finds that the adoption of these rules on an emergency basis is necessary to preserve the public peace, health, safety, and welfare, and to ensure an orderly transition to the new statutory framework. These emergency rules will remain in effect until superseded by permanent rules adopted through the standard rulemaking process.

Date the rule impact statement was prepared and the date modified:

Prepared: August 21, 2026

Modified: N/A

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