

**MSBPA POLICY: FIRM PERMITS FOR FIRMS WITH MULTIPLE PHYSICAL LOCATIONS IN MISSISSIPPI, OUT-OF-STATE FIRMS WITH AT LEAST ONE PHYSICAL OFFICE IN MISSISSIPPI, AND OUT-OF-STATE FIRMS WITH NO PHYSICAL OFFICES IN MISSISSIPPI.**

**Excerpt from MSBPA Board Minutes dated December 12, 2014**

**(RE: Policy Change Related to Firms With Physical Offices Located in Mississippi. This policy is currently in effect)**

*The Board determined that Mississippi CPA firms with multiple offices physically located in Mississippi will only need one primary location to be registered with a firm permit. With regard to the non-primary offices, the firm needs only to annually provide the Board with a list of all other physical offices, physical addresses of those offices, and the resident manager for each of those firm offices.*

*Also, any CPA firm whose primary office is located outside of Mississippi, but which does maintain an office physically located in Mississippi, will only need the Mississippi office registered with the Board with a firm permit. The other firm offices located out-of-state may perform engagements in Mississippi under the firm permit of the Mississippi office.*

*Finally, the Board determined that each office of an out-of-state firm that does not have a physical office location in Mississippi, but which is performing engagements for Mississippi entities that requires a firm permit in accordance with Code Section 73-33-17(4)(see below), will need to register each out of state office performing such engagements with a firm permit.*

**MS Accountancy Code Section 73-33-17(4):**

**(RE: out-of-state firms performing audits of entities located in MS)**

*An individual who has been granted practice privileges under this section who, for any entity with its home office in this state, performs any of the following services:*

- (a) Any financial statement audit or other engagement to be performed in accordance with Statements on Auditing Standards;*
  - (b) Any examination of prospective financial information to be performed in accordance with Statements on Standards for Attestation Engagements; or*
  - (c) Any engagement to be performed in accordance with PCAOB Auditing Standards;*
- may only do so through a firm which has obtained a permit issued under Section 73-33-1(3).*

## **Clarification of MSBPA Firm Physical Office Policy**

**For Purposes of this Physical Office Location Policy**– the CPA firm must have an office physically located in Mississippi, and it must be real property owned, rented, or otherwise occupied by the firm. For CPA Firms physically located in another state, which do not have a physical office in this state, and which are performing engagements for Mississippi entities that require firm permits in accordance with Code Section 73-33-17(4), the use of rental post office boxes located in Mississippi, “Mailbox Forwarding” Offices, and /or “Virtual” Offices would not be considered physical offices located in this state.

## **Examples Related to MSBPA Firm Physical Office Policy**

- 1) CPA Firm Having More Than One Physical Office Located in Mississippi – the firm will designate one physical location as the Primary Location. All of the firm permits of the other physical office locations in Mississippi will be canceled and Board staff will list those physical offices as Branch Offices on the Primary Firm’s record in the Board CPA Firm database. The firm’s Primary Location will show the physical address and resident manager’s name of each Branch Office location. When the CPA Firm (Primary Location) renews its firm permit, the firm contact person will update the Branch Office information by adding or deleting Branch Office locations in this state.
- 2) National CPA Firm Having One Physical Office Located in Mississippi – the firm will designate the Mississippi physical location as the Primary Location (for purposes of complying with this Board firm permit policy). Firm offices physically located outside of Mississippi that are engaged in audits of entities located in this state may perform those engagements under the firm permit of the office physically located in Mississippi (the Primary Location). The out-of-state firm office should contact the resident manager of its Mississippi office (Primary Location) and get listed as a Branch Office of the Mississippi office. Should there be a question about how to get listed as a Branch Office in Mississippi, call the Board office at 601-354-7320.
- 3) Out-Of-State CPA Firm Office Having No Physical Office Located in Mississippi – Each out-of-state office (with no physical office in this state) performing audits in this state must do so under a separate Mississippi Firm Permit. The Application for Mississippi CPA Firm Permit may be found on the Board’s website.