

January 19, 2023

Mr. Brad Coffey  
AICPA Peer Review  
Via email @ [PR\\_expdraft@aicpa.org](mailto:PR_expdraft@aicpa.org)

Re: *Proposed Peer Review Standards Update No. 1, Omnibus Enhancements and Technical Corrections*

Dear Mr. Coffey

The Peer Review Committee (the Committee) of the Florida Institute of Certified Public Accountants (FICPA) respectfully submits its comments on the above referenced proposal. The Committee is a technical committee of the FICPA and has reviewed and discussed the above-mentioned proposed Peer Review Standards Update. The FICPA has more than 19,500 members, with its membership comprised primarily of CPAs in public practice and industry. The Committee is comprised of twenty-two members consisting of different size firms throughout the state. The response below reflects only the views of the Committee. The Committee has the following comments related to the questions requested for comment numbered below:

1. The proposed changes described in the summary including any suggestions for improving the understandability and applicability of the requirements or application and other explanatory material. The Committee agrees with the proposed changes as described in the summary. Many of the changes are minor and have little to no impact on the way peer reviews are currently performed. Revising such wording from “presently” to “currently,” etc. does not have a significant impact on how reviews are performed, reported on, or administered. However, the Committee believes that if such changes reflect the appropriate terminology in the AICPA’s view, we agree with the proposed changes made.

The change made to assessing control risk at PR-C Section 210.17 is a good change as control risk is assessed prior to the testing compliance of the firm’s policies and procedures. However, the Committee would like for the Board to consider adding a subsequent question in the SRM in the risk assessment area to address the following: “Did the review team consider the effect of any matters noted during the review of engagements and testing of compliance with policies and procedures to lead the review team to consider changing its initial assessment of control risk and the impact to the scope of engagements reviewed?” Control risk should be an on-going assessment.

PR-C Section 220.36 – Although we do not administer NPRC reviews, we could not think of any planning documents noted in item “c” that would be required to be submitted for engagement reviews, especially since PRIMA lists out the details of engagement issued by the responsible party. It appears that this was just copied from the system requirements and may not be applicable to engagement reviews.

The Committee likes the new requirements that there may be rare circumstances where exceptions to reviewer qualification or RAB qualifications may be approved for both system and engagement reviews. The question proposed by this Committee is whether the AICPA can only approve those exceptions? Or could the Administering Entity also approve?

RAB qualifications have an exception in PR-C Section 410.21.d where it references the rare exception in para. .A25. The Committee questions why PR-C 410.25.c for third parties does not have the same exception as RAB members. If this is considered and included para. A25 would need to cross reference back to paragraph .25 in addition to .21.

2. The Committee believes the proposed effective date of May 31, 2023, is sufficient to implement the changes in the proposed update. The changes proposed are not significant enough to impact how reviews are performed or administered to delay the effective date until a later date.

The Committee appreciates this opportunity to respond to the exposure draft. Members of the Committee are available to discuss any questions or concerns raised by this response.

Respectfully submitted,



Ron Weinbaum, CPA  
Chair, Florida Institute of CPAs Peer Review Committee

Committee members coordinating this response:

Ileana Alvarez, CPA  
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