PEER REVIEW
ALLIANCE

Annual Report on Peer Review Activities

**Issued
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Introduction and Purpose

The Peer Review Alliance ("PRA") is one of 25 Administering Entities ("AEs") of the AICPA Peer Review Program ("Program" or "PRP"), PRA administers reviews for approximately 2,100 firms in seven states – Illinois, Indiana, Iowa, Kentucky, South Carolina, West Virginia, and Wisconsin. See **Exhibit A** for the Number of Enrolled Firms by Firm Size.

The purpose of this Annual Report on Peer Review Activities ("report") is to provide a general overview, including statistics and information.

Scope and Use of this Report

This report should be reviewed in its entirety to understand the full context. Information presented in this report pertains to peer reviews accepted during calendar years 2020-2022, which covers a full three-year cycle. Oversight procedures included in this report are performed on a calendar year basis.

> *COVID-19 Impact:* As a result of the COVID 19 pandemic and the automatic six-month extensions approved by the AICPA Peer Review Board ("PRB") in May 2020 for all firms with reviews, corrective actions, and implementation plans originally due from January 1 to September 30, 2020, fewer reviews were accepted in 2020. After September 30, 2020, AEs were encouraged to continue to be lenient when considering due date extension requests from firms if Covid-19 was cited as a reason. Offsetting that however was the Illinois license renewal deadline which required all CPA firms and sole practitioners licensed in Illinois to have satisfactorily completed their peer review in 2021, which explains why there were a greater number of reviews accepted in 2021.

Peer Review Administrative Process Overview

To understand PRA's oversight procedures, it is first helpful to have an overview of PRA's administrative processes.

Scheduling

Firms to be peer reviewed receive Peer Review Information ("PRI") and Scheduling ("SCH") forms that request information on the firm's management and structure, audit and attest engagements, peer reviewer information, as well as dates of planned commencement and the exit conference. This information is entered by the firms and peer reviewers in the AICPA peer review database, Peer Review Information Management Application (PRIMA). Once this information is received, validations related to peer reviewer qualifications and other data are performed by PRA administrative staff. Any issues identified through this process are addressed by the firm, review team, or both, with the assistance of PRA staff as necessary until all issues have been resolved. A scheduling verification is sent to the firm and

the team or review captain upon completion of the scheduling process. Peer reviews are then monitored by PRA staff for timely submission of peer review documents.

As required by the *AICPA Standards for Performing and Reporting on Peer Reviews* (*Standards*), peer reviewers must timely complete and update a resume that accurately reflects their reviewer qualifications, including recent industry experience. PRA staff use this information to confirm the peer reviewer's or peer review team's experience appropriately matches the firm being reviewed.

Administrative Review

Upon receipt from the team or review captain, peer review documents are reviewed by PRA administrative staff to determine, among other things, whether all documents required to be submitted to the AE have been submitted; whether the names, dates, etc. appear to be consistent; and whether the format of the documents appear to conform with AICPA *Standards for Performing and Reporting on Peer Reviews* (standards). Administrative reviews are documented using a comprehensive peer review administrative checklist. Any significant discrepancies identified through this process are addressed by the firm, review team, or both, with the assistance of PRA staff, as necessary, until all issues have been resolved. The documents are then assigned to a PRA technical reviewer.

Technical Review

The technical review includes review of a Summary Review Memorandum describing the major aspects of the review, quality control checklists (and documents, if available), and other working papers. This also includes review of Single Audit engagement profiles and related engagement checklists. The technical review is documented using a comprehensive technical review checklist.

The technical reviewer's role is to anticipate questions from the peer review report acceptance committee; seek answers from the team or review captain and/or firm; address issues or problems that are noted during the working paper review; and, if necessary, consult with AICPA staff. The technical reviewer advises the committee of significant matters related to the review; provides certain working papers for the committee to use in its report acceptance decisions; and recommends whether the reviewed firm should be asked to complete one or more corrective actions or implementation plans and whether the reviewer should receive any performance feedback. The documents are then assigned to a report acceptance committee.

Report Acceptance

The Peer Review Alliance Report Acceptance Committee ("Committee") is composed of approximately 40 experienced peer review team or review captains. Committee members include volunteers from each state administered by the PRA and are assigned to one of eight report acceptance bodies (RABs). RABs meet via conference call on a rotating weekly basis outside of tax season and consider approximately 10-15 reviews at each meeting.

Each RAB is led by a chair who also serves as a member of the Peer Review Alliance Executive Committee. RAB members must be independent of the reviewed firm, the review team and the review teams' firms. The technical reviewer is available during the RAB meeting to answer any questions the members might have. RAB members are assigned to the calls to obtain a cross-section of industry experience. The role of the RAB is to consider peer reviews for acceptance as well as certain extension requests, corrective actions or implementation plans, and reviewer performance feedback.

One week prior to a scheduled call, the RAB members assigned to that call receive an agenda consisting of a spreadsheet summarizing the items being presented, the RAB member responsible for presenting each item and the technical reviewer. The RAB materials also include relevant peer review documentation for each review being presented, such as:

- Peer review report
- Letter of response, if applicable
- Prior peer review report and letter of response, if applicable
- Summary Review Memorandum
- Single Audit profiles and checklists, if applicable
- Firm representation letter
- Finding for Further Consideration (FFC) forms, if applicable
- Matter for Further Consideration (MFC) forms, if applicable
- Prior peer review FFC forms, if applicable
- Other supporting documents, if applicable

RAB members have an opportunity to discuss the peer review with the technical reviewer and others prior to presentation to the RAB on the scheduled conference call.

See **Exhibit B** for the Results by Type of Peer Review and Report Issued; **Exhibit C** for the Number and Reasons for Report Modifications – System Reviews Only; and **Exhibit D** for the Number of Engagements Not Performed or Reported on in Conformity with Professional Standards in all Material Respects (nonconforming engagements). See **Exhibit E** for a Summary of Required Follow-up Actions (including corrective actions and implementation plans).

Oversight of Peer Reviews and Reviewers

Minimum Requirements

The AICPA PRP Oversight Handbook specifies certain minimum requirements for oversight. At a minimum, AEs are required to conduct oversight on 2% of all peer reviews accepted in a calendar year, and within the 2% selected, there must be at least two of each type of peer review evaluated (system and engagement reviews).

> *COVID-19 Impact*: As a result of the COVID 19 pandemic and the unusual number of reviews accepted by AEs in 2020 and 2021, the PRB relaxed the required minimum oversights to 1% of all peer reviews accepted in 2020 and 2021, and within the 1% selected, there must be at least one of each type of peer review evaluated (system and engagement review. The 2% threshold was reinstated for 2022 and beyond.

Oversight Selection

The Committee selects various reviews throughout the year for oversight. The selections may be random or targeted and are based on the criterion for selection as outlined in the Oversight Handbook and meet the minimum requirements discussed above.

Firms
All firms are subject to oversight and are selected based on several factors including but not limited to: (a) the types of peer review report ratings the firm has received previously; (b) whether it is the firm's first system review (after previously having an engagement review), and/or (c) whether the firm conducts engagements in high-risk industries.

Peer Reviewers
All peer reviewers are subject to oversight and are selected based on a number of factors including but not limited to: (a) random selection, (b) frequent submission of peer review reports with a rating of *pass* and few or no MFC or FFC forms, (c) conducting a significant number of reviews for firms with audits in high risk industries, (d) performance of their first peer review and/or (e) performance of a high volume of reviews. Oversight of a reviewer can also occur due to single instances or a pattern of performance findings or deficiencies, such as: (f) issuance of an inappropriate peer review report, (g) not considering matters that are deemed by the RAB or oversight reviewer to be significant and/or (h) failure to select an appropriate number of engagements.

See **Exhibit F** for a summary of Oversights of Peer Reviews and Reviewers.

Enhanced Oversight

The AICPA Peer Review Board Oversight Task Force ("OTF") coordinates enhanced oversights performed by subject matter experts (SMEs). The objective of the enhanced oversight program is to increase the probability that peer reviewers are identifying all material issues on must-select engagements, including whether engagements are properly identified as nonconforming. The enhanced oversights focus exclusively on must-select engagements that were applicable at that time.

During 2020-2022, must-select engagements included those performed under *Government Auditing Standards,* audits of employee benefit plans, audits performed under the Federal Deposit Insurance Corporation Improvement Act (FDICIA), audits of broker-dealers and examinations of service organizations. Most oversights are performed on employee benefit plan, single audit, and *Government Auditing Standards* engagements, as these are the most common must-select engagements. Only one engagement is reviewed for each firm selected, and the SME does not expand the scope of the oversight.

Reviews administered by PRA are included in the population of reviews subject to enhanced oversight. For more information about enhanced oversights, please refer to the AICPA's PRP Annual Report on Oversight which can be found here on the AICPA website.

Administrative Oversight

Every two years, AEs are subject to an administrative oversight by one or more members of the OTF and/or AICPA staff. For more information about the AE administrative oversight process and a copy of PRA's most recent report, click here on the AICPA website.

 Administering Entity Benchmarks

Since 2018, AEs have monitored and periodically reported to the OTF on their compliance with AE benchmarks, which are qualitative, objective, and measurable criteria to enhance overall quality and effectiveness of Program administration. Benchmarks are divided into four categories based on the individual(s) with primary responsibility: administrators, technical reviewers, peer review committee/RAB members and the CPA on staff. The benchmarks include qualitative, objective measurable criteria, which may be modified over time due to advances in technology and other factors.

PRA reports on its compliance with the benchmarks three times per year, with each reporting period covering four months. For more information about AE benchmarks, please refer to the AICPA's PRP Annual Report on Oversight which can be found here on the AICPA website.

RAB Observations

OTF also coordinates periodic reviews of RAB meetings for each of the AEs. The primary objectives of the RAB observation are to determine whether:

- Reviews are conducted and reported on in accordance with the Standards,
- Results of reviews are evaluated on a consistent basis within an AE and in all jurisdictions,
- Administrative procedures established by the PRB are being followed and
- Administrators, technical reviews, peer review committee/RAB members and the CPA on staff are complying with applicable benchmarks monitored through RAB observations.

RAB observations allow for real-time feedback to RABs and AEs, which help improve overall quality and consistency of the RAB process. The process for RAB observations is like the process used during the administrative oversights. Prior to the meeting, the RAB observer receives the materials that will be presented to the RAB, selects a sample of reviews of firms enrolled in the Program and reviews the materials. During the meeting, the RAB observer offers comments at the close of discussions based on issues or items noted during his or her review of the materials. All significant items that were noted by the RAB observer, but not the RAB, are included as comments in the RAB observation report, which is reviewed and approved by the OTF. The final report is sent to the AE's peer review committee chair and CPA on staff. Peer review committees may respond after the final report is issued by the OTF.

For more information about the RAB observation process, please refer to the AICPA's PRP Annual Report on Oversight which can be found here on the AICPA website.

Exhibit A

**Number of Enrolled Firms by Firm Size
As of December 31, 2022**

Number of Professionals*	Illinois	Indiana	Iowa	Kentucky	South Carolina	West Virginia	Wisconsin	Totals
Sole practitioner, no additional A&A professional(s)	149	80	27	57	92	26	26	457
2-5	288	148	74	113	140	52	103	918
6-10	95	71	37	47	40	24	51	365
11-19	47	26	13	19	17	6	15	143
20-49	28	10	15	9	11	4	16	93
50-99	8	2	3	2	1	-	2	18
100+	2	4	1	-	-	-	2	9
Enrolled firms performing no engagements subject to peer review (no A&A)	47	17	8	19	16	13	11	131
Totals	**664**	**358**	**178**	**266**	**317**	**125**	**226**	**2,134**

* Professionals are considered all personnel who perform accounting and/or auditing (A&A) services, for which the firm is responsible, whether or not they are CPAs

Exhibit B

Results by Type of Peer Review and Report Issued

| | Calendar Year | | | | | | | |
| | 2020 | | 2021 | | 2022 | | Totals | |
	Reviews	%	Reviews	%	Reviews	%	Reviews	%
System Reviews:								
Pass	198	78.3	370	84.9	263	81.9	831	82.3
Pass with deficiencies	30	11.8	42	9.6	38	11.9	110	10.9
Fail	25	9.9	24	5.5	20	6.2	69	6.8
	253	**100.0**	**436**	**100.0**	**321**	**100.0**	**1,010**	**100.0**
Engagement Reviews:								
Pass	254	82.5	400	81.3	256	77.6	910	80.5
Pass with deficiencies	28	9.1	69	14.0	51	15.4	148	13.1
Fail	26	8.4	23	4.7	23	7.0	72	6.4
	308	**100.0**	**492**	**100.0**	**330**	**100.0**	**1,130**	**100.0**
All Reviews:								
Pass	452	80.6	770	83.0	519	79.7	1,741	81.4
Pass with deficiencies	58	10.3	111	12.0	89	13.7	258	12.0
Fail	51	9.1	47	5.0	43	6.6	141	6.6
	561	**100.0**	**928**	**100.0**	**651**	**100.0**	**2,140**	**100.0**

Exhibit C

Type and Number of Reasons for Report Deficiencies – System Reviews Only

	Calendar Year			
	2020	2021	2022	Totals
Reasons for Report Deficiencies:				
Leadership responsibilities for quality within the firm (the tone at the top)	6	7	9	22
Relevant ethical requirements	6	5	1	12
Acceptance and continuance of client relationships and specific engagements	6	6	7	19
Human resources	23	22	21	66
Engagement performance	48	56	47	151
Monitoring	24	25	24	73
Totals	**113**	**121**	**109**	**343**

Exhibit D

**Number of Engagements Not Performed or Reported on in
Accordance with Professional Standards in All Material Respects (Nonconforming Engagements)**

	Calendar Year								
	2020			**2021**			**2022**		
	Number of Engagements			**Number of Engagements**			**Number of Engagements**		
	Reviewed	**Nonconforming Engagements**	**%**	**Reviewed**	**Nonconforming Engagements**	**%**	**Reviewed**	**Nonconforming Engagements**	**%**
Audits									
Single Audit	114	58	*50.9*	161	69	*42.9*	139	43	*30.9*
Government Auditing Standards – All Other	121	42	*34.7*	204	74	*36.3*	160	38	*23.8*
ERISA	181	61	*33.7*	248	55	*22.2*	208	32	*15.4*
FDICIA	2	-	-	3	-	-	4	1	*25.0*
Other	317	106	*33.4*	516	160	*31.0*	402	64	*15.9*
Reviews	346	52	*15.0*	587	86	*14.7*	425	61	*14.4*
Compilations and Preparations									
With Disclosures	253	17	*6.7*	393	30	*7.6*	270	28	*10.4*
Omit Disclosures	827	88	*10.6*	1,301	88	*6.8*	885	80	*9.0*
Financial Forecasts and Projections	4	-	-	1	-	-	1	-	-
SOC Reports	3	1	*33.3*	6	1	*16.7*	20	1	*5.0*
Agreed-Upon Procedures	94	9	*9.6*	133	10	*7.5*	105	14	*13.3*
Other SSAEs	39	5	*12.8*	54	5	*9.3*	47	1	*2.1*
Totals	2,301	439	*19.1*	3,607	578	*16.0*	2,666	363	*13.6*

Exhibit E

Summary of Required Follow-up Actions (Includes Corrective Actions and Implementation Plans)

Type of Follow-up Action	Calendar Year		
	2020	2021	2022
Agree to take/submit proof of certain continuing professional education (CPE)	220	326	229
Post-issuance review of certain engagements	103	148	109
Pre-issuance review of certain engagements	31	15	40
Submit monitoring/inspection report for review by team captain or peer review committee	15	10	17
Submit evidence of proper firm license	8	14	7
Agree to team captain/outside party revisit	7	15	5
Firm represented in writing that it no longer performs, or was engaged to perform, certain types of engagements	6	1	3
Agree to hire outside party to perform the firm's monitoring/inspection procedures, or to oversight monitoring/inspection procedures completed by firm personnel	4	8	6
Agree to remediate, or hire team captain/outside party to review remediation of, nonconforming engagement(s)	2	8	4
Team captain/outside party review of firm's quality control document (QCD)	2	1	5
Other	1	-	2
Totals	**399**	**546**	**427**

Exhibit F

Peer Review Alliance Oversights of Peer Reviews and Reviewers

	2020	2021	2022
Type of Peer Review:			
System	5	5	5
Engagement	10	4	4
Totals	15	9	9