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May 15, 2026

**Office of the Secretary**  
**Public Company Accounting Oversight Board**  
1666 K Street NW  
Washington, DC 20006-2803

**Re: PCAOB Release No. 2026-001 – PCAOB Strategic Priorities**

Dear Board Members:

Yount, Hyde & Barbour, P.C. (“YHB”) appreciates the opportunity to comment on PCAOB Release No. 2026-001, PCAOB Strategic Priorities. YHB is a public accounting firm providing audit and assurance services to small public financial institutions and other entities affected by PCAOB standards.

We support the PCAOB’s objective in support of its statutory mission to protect investors and further the public interest in the preparation of informative, accurate, and independent audit reports and offer the following responses. Our comments focus on the strategic priorities’ impact on smaller public entities and their auditor firms.

**1. Strategic Priorities in Registration, Inspections, and Enforcement**

We recommend that the PCAOB prioritize providing proactive guidance and expectations for audit evidence and documentation, while focusing inspections and disclosure of enforcement actions on matters that materially impact audit quality and investor protection rather than technical or inconsequential compliance issues that provide more confusion than benefit to users of the inspection reports. Additionally, the PCAOB should place greater emphasis on evaluating firm-level quality control systems rather than prescribing highly specific audit execution requirements, allowing firms to apply professional judgment tailored to industry and issuer complexity. To further tailor the inspection process and improve scalability and effectiveness, we recommend including tiered regulatory expectations based on issuer size and market impact.

## **2. Changes to the Inspections Program (Including QC 1000)**

We believe the inspections program would benefit from increased transparency around expectations, reducing the current gap between broadly written standards and highly specific inspection interpretations, and enabling firms to implement improvements proactively. Inspections should also incorporate greater industry expertise within inspection teams and align more closely with QC 1000 by focusing on the effectiveness of firm-level quality control systems rather than primarily on individual engagement deficiencies.

## **3. Inspection Reporting and Usefulness to Stakeholders**

We suggest enhancing inspection reporting by introducing a graded or tiered system that distinguishes the severity of findings, as the current binary approach does not provide sufficient context to stakeholders. Incorporating severity into Part I.A and Part I.B disclosures and improving the timeliness of report issuance would make the reports more meaningful, actionable, and relevant for both firms and users. If noted findings would not change the opinion or impact the general public, we recommend these comments be kept private unless not sufficiently and timely remediated by the firm. This practice would foster an atmosphere of continuous improvement for the firms, while highlighting the most severe issues for the public to evaluate.

## **4. Standard-Setting Priorities**

We believe the PCAOB should limit the issuance of new standards given the already significant volume of existing requirements while prioritizing providing guidance related to the use of emerging technology and artificial intelligence in audits, including expectations around acceptable applications, audit evidence, and documentation. Clear guidance in this area, such as what was done for the successful rollout of QC 1000, would support innovation, consistency, and improved implementation by those following the standards without adding unnecessary complexity.

## **5. Alignment with International Auditing Standards**

We encourage the PCAOB to pursue greater alignment with international auditing standards to reduce complexity and inefficiencies for firms operating globally, while avoiding unnecessary divergence unless there is a clear and compelling investor protection rationale for maintaining differences.

## **6. Use of Technology and AI by the PCAOB**

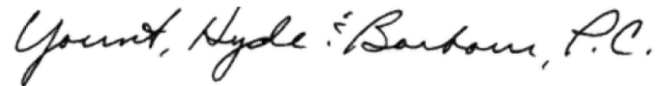
We recommend that the PCAOB both provide clear guidance to firms on the use of AI and leverage its own use of technology and data analytics to support a more risk-based oversight approach, thus enabling the tiered regulatory expectation approach noted in Question 1.

## **7. Enhancing Transparency with Stakeholders**

We believe the PCAOB can enhance transparency by increasing direct communication with registrants regarding expectations, particularly in areas such as internal controls and documentation, and by improving clarity and consistency in inspection practices. Addressing perceptions of a punitive, findings-focused inspection approach and fostering a more collaborative regulatory environment would benefit auditors, issuers, and investors alike.

We appreciate the PCAOB's consideration of our comments on Release No. 2026-001. We would be pleased to discuss these observations further or provide additional information regarding the potential effects of the strategic priorities on our firm and our clients.

Sincerely,

A handwritten signature in cursive script that reads "Yount, Hyde & Barbour, P.C.".

**Yount, Hyde & Barbour, P.C.**

For further questions please contact:

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