

Dennis R. Beresford, CPA
1170 Lake Welbrook Drive
Athens, Georgia 30606
dberesfo@uga.edu
706 207-1840

April 3, 2026

Public Company Accounting Oversight Board
1666 K Street NW
Washington, DC 20006-2803

RE: PCAOB No. 2026-001

Dear Board Members:

I appreciate the opportunity to comment on Release No. 2026-001, Request for Public Comment – PCAOB Strategic Priorities. I commend the Board for undertaking a fresh assessment of how best to articulate its goals and objectives in support of its statutory mission to protect investors and promote informative, accurate, and independent audit reports. I am also pleased that the Board is seeking stakeholder input at this early stage.

Rather than responding directly to the specific questions in the Release, I offer several observations based on my longstanding involvement with the PCAOB and related standard-setting activities that I believe warrant consideration in developing the new strategic plan.

By way of background, my engagement with the PCAOB dates to its inception, including testimony during the legislative process leading to the Sarbanes-Oxley Act of 2002. Over the past two decades plus, I have submitted comment letters on numerous auditing proposals and served two terms on the PCAOB's former Standing Advisory Group. Prior to retirement, I was a national office partner at Ernst & Young, served two terms as Chairman of the Financial Accounting Standards Board, and was Executive Professor of Accounting at the University of Georgia for more than fifteen years. I also

served on several corporate boards and chaired audit committees at large public companies, including during periods of significant accounting, auditing, and governance challenges. Although I am no longer directly involved in practice, I maintain a strong interest in the PCAOB's work.

Engagement with Outside Experts

I was encouraged to learn of the PCAOB's Audit Practitioner Fellowship Program. Similar programs at the SEC and FASB have long demonstrated the value of incorporating individuals with recent, practical experience into the standard-setting process. I am confident this initiative will enhance the work of the Office of the Chief Auditor.

At the same time, I believe the PCAOB could further benefit from more consistent and open engagement with experienced professionals outside the organization, including those with SEC or FASB fellowship experience now serving in accounting firm national offices as well as former PCAOB staff now in practice. These individuals possess deep expertise and are actively involved in interpreting and implementing PCAOB standards.

I agree with the Chairman's statement emphasizing the need to deepen engagement with stakeholders and improve accessibility to those developing standards. One practical step would be to adopt a "fatal flaw" review process like that used by the FASB, whereby near-final drafts are reviewed by knowledgeable external experts to identify unintended consequences or implementation challenges. In addition, field testing of proposed standards – another practice successfully used by the FASB – could help assess whether new requirements are operable and likely to improve audit quality.

Transparency in the Standard-Setting Process

I was encouraged by the Board's stated commitment to openness but remain concerned that public meetings typically do not include substantive discussion or debate. My experience at the FASB demonstrated that open deliberations – where staff recommendations are actively discussed and challenged – lead to better outcomes and a more informed constituency.

I urge the Board to consider increasing the transparency and interactivity of its meetings and to move away from what may appear to observers as an overly legalistic process with Board members mainly reading from prepared scripts. Greater openness, combined with enhanced external engagement, should improve both the quality and credibility of PCAOB standards.

Quality Control Standard QC 1000

I support the Chairman's direction to seek additional public input on QC 1000. Comments submitted to the SEC indicate that certain aspects of the final standard may not have been fully anticipated by accounting firms, in part due to changes made after exposure.

Given the likelihood that revisions will be necessary and take some time for further consultation, exposure, and redeliberation, I recommend that the Board formally suspend the effective date of QC 1000. This would reduce uncertainty for accounting firms and allow sufficient time to ensure that the final standard achieves its intended objectives.

Advisory Groups

The PCAOB's advisory groups play an important role, and I suggest reconsidering both their composition and function. The overlap in membership between the Investor Advisory Group (IAG) and the Standards and Emerging Issues Advisory Group (SEIAG) may dilute the distinct perspective each group is intended to provide. Separate membership, with no or minimal overlap, would help preserve the clarity of input from each constituency.

In addition, the SEIAG could play a more formal role in the consultation process being developed within the Office of the Chief Auditor, particularly in providing practical perspectives from those responsible for implementing standards.

I also encourage the Board to consider establishing a dedicated Audit Committee Advisory Group. Audit committees are central to the oversight of

independent audits, yet their perspectives may not be fully reflected within the current advisory structure.

Inspection Process

While my direct experience with inspections is limited, I offer one observation based on prior service as an audit committee chair. During an inspection, I was asked to participate in an interview without the presence of company management. Although I ultimately agreed, I remain concerned that excluding company representatives could lead to incomplete or inaccurate information being conveyed. Allowing appropriate participation by company officials could enhance the quality and reliability of information obtained during inspections and ensure that all relevant parties have a clear understanding of the matters discussed.

Conclusion

As an interested observer rather than current active participant, my comments are necessarily selective. I expect that the Board will receive a wide range of valuable input from stakeholders, and I hope my limited observations are helpful as part of that process.

I would be pleased to elaborate on any of these points if that would be useful. I appreciate the Board's effort to develop a thoughtful and effective strategic plan and look forward to your continued progress.

Sincerely,

/Signed Dennis R. Beresford/

Dennis R. Beresford, CPA