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September 4, 2026

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

Re: PCAOB Release No. 2026-006, Draft 2026-2030 Strategic Plan Goals and Objectives

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Dear Office of the Secretary:

BDO USA, P.C. ("BDO" or the "Firm") appreciates the opportunity to comment on the Public Company Accounting Oversight Board's ("PCAOB" or the "Board") Draft 2026-2030 Strategic Plan Goals and Objectives. We support the Board's efforts to establish strategic priorities that advance investor protection and audit quality while recognizing the evolving risks, technologies, and operating complexity affecting investors, issuers, auditors, and regulators.

**Overall views**

We believe the Strategic Plan provides an important opportunity for the Board to move from a set of broadly supported objectives to a more integrated and measurable operating model. The final plan will be most effective if it clearly connects standard setting, implementation support, inspections, enforcement, stakeholder engagement, technology, and performance measurement so stakeholders can understand how the Board's priorities will be coordinated, executed, and assessed over the planning period.

Consistent with our prior comments, we believe implementation of the Strategic Plan would be most effective if grounded in the following principles: risk-based and materiality-focused oversight that prioritizes risks, deficiencies, and other matters most consequential to investors and audit quality; scalability that recognizes differences in firm size, structure, geographic footprint, and operating models; harmonization with relevant quality management and auditing frameworks wherever appropriate; transparency regarding regulatory expectations and outcomes; meaningful stakeholder engagement; robust economic analysis; and coordination across PCAOB functions to promote consistent communication of expectations. These principles are consistent with our May 15, 2026 comment letter on PCAOB strategic priorities and our August 7, 2026 comment letter on PCAOB standard setting.

**Modernizing oversight would be strengthened by execution, consistency, and measurable outcomes**

We support the Board's objectives to modernize standard setting, inspections, enforcement, stakeholder engagement, technology, and organizational effectiveness. As the Board finalizes the

Strategic Plan, identification of the limited number of tactical priorities that will drive execution and accountability over the next five years will strengthen the plan. Clear prioritization would help stakeholders understand where resources will be focused, how initiatives will be sequenced, and how success will be evaluated.

The final plan also would benefit from meaningful performance indicators that evaluate whether strategic initiatives are improving regulatory transparency, inspection consistency, implementation effectiveness, stakeholder confidence, and audit quality, rather than only tracking completion of planned activities. Measures related to inspection timeliness, remediation determinations, implementation support, post-implementation reviews, technology-enabled risk identification, and coordination across PCAOB functions would provide useful visibility into progress.

**Standard setting and implementation would benefit from a risk-based, practical, and appropriately aligned approach**

Quality standards are most effective when they are clear, operationally practical, responsive to emerging risks, and capable of consistent application across firms and engagements. Continued prioritization of standard-setting initiatives based on their expected impact on investor protection and audit quality, with appropriate consideration of materiality, feasibility, scalability, costs, benefits, cumulative implementation demands, and potential unintended consequences, would support effective implementation.

The Strategic Plan also provides an opportunity for the Board to continue evaluating opportunities to align PCAOB requirements with analogous auditing and quality management frameworks, including International Standards on Auditing, International Standard on Quality Management 1, and the AICPA's Statement on Quality Management Standards No. 1, wherever appropriate and without compromising the Board's statutory mandate. We believe this objective is advanced not only by using existing international standards as an appropriate baseline, but also through early and meaningful collaboration with other standard setters during agenda setting and project development. Engagement at the beginning of the process can help reduce unnecessary divergence, promote greater harmonization across auditing and quality management standards, and support standards that are capable of consistent, effective implementation across jurisdictions. Where significant differences are retained, transparency regarding the rationale for those differences and the expected investor-protection benefits would help stakeholders understand the Board's objectives and expectations.

Consistent with our prior standard-setting comments, we also support incorporating robust economic analysis within a durable conceptual framework for PCAOB standard setting. Such a framework would promote a disciplined and transparent decision-making process by requiring the Board to identify the problem to be addressed, evaluate reasonable alternatives, and assess expected benefits, costs, feasibility, scalability, and potential unintended consequences before determining whether standard setting is the appropriate regulatory tool. This analysis would also help stakeholders understand how the Board evaluates priorities and whether additional requirements are expected to produce benefits that are proportionate to their costs and implementation demands.

**Inspections modernization can support a quality-control-focused oversight model**

We believe inspection modernization represents a significant opportunity to enhance audit quality. As the Board continues implementing QC 1000 and transitions toward a more quality control-focused inspection program, inspections focused on whether a firm's system of quality control is designed and operating to achieve quality objectives would provide meaningful insight, rather than emphasizing procedural compliance or documentation formality. Inspection modernization should support a more risk-based allocation of regulatory resources and appropriately consider the effectiveness of firms' systems of quality control when determining the nature and extent of inspection activities.

Effective inspection modernization also requires actionable transparency. We encourage the Board to establish clearer and more objective remediation criteria, explain the factors considered in determining whether corrective actions have satisfactorily addressed quality control criticisms, communicate how meaningful progress is incorporated into remediation determinations where applicable, and provide timely feedback on approaches that have supported successful remediation. Greater transparency regarding remediation expectations and outcomes would help firms more effectively design, implement, and assess corrective actions, improve consistency in application, and focus quality improvement activities on matters most relevant to investor protection.

**Stakeholder engagement, technology, and organizational effectiveness are critical enablers**

Meaningful stakeholder engagement contributes to more informed, practical, and sustainable regulatory outcomes. Continued use of requests for comment, advisory groups, public meetings, roundtables, implementation forums, and other mechanisms throughout standard setting, implementation, inspections, and significant strategic initiatives would support that objective. Greater transparency regarding how stakeholder feedback influences Board decisions, including themes raised, areas where feedback affected the Board's approach, and the rationale for retaining significant requirements despite stakeholder concerns, would further strengthen confidence in the process.

We also support the Board's focus on technology, data analytics, and emerging technologies, including artificial intelligence. These capabilities can improve risk identification, inspection planning, resource allocation, and operational effectiveness when paired with appropriate governance, accountability, data safeguards, professional judgment, and oversight. As technology continues to evolve, regulatory expectations that remain sufficiently flexible to accommodate innovation, while maintaining safeguards that support audit quality and investor protection, will be important.

Finally, organizational effectiveness and stewardship provide the foundation for execution of the Strategic Plan. Maintaining current expertise in auditing, quality management, technology, and evolving issuer risks, and continuing to evaluate mechanisms for obtaining relevant outside perspectives consistent with applicable independence and ethics requirements, would support the Board's strategic objectives. Continued efforts to attract and retain personnel with current auditing, technology, and issuer experience will also be important to achieving those objectives. Clear accountability, current expertise, and transparent reporting will help demonstrate how PCAOB resources are being directed toward advancing investor protection and audit quality.

**Conclusion**

BDO appreciates the opportunity to provide comments on the Draft 2026-2030 Strategic Plan Goals and Objectives. We support the Board's proposed direction and encourage continued emphasis on risk- and materiality-focused oversight, scalability, transparency, stakeholder engagement, practical implementation support, measurable outcomes, coordination across PCAOB functions, robust economic analysis and harmonization with relevant auditing and quality management frameworks where doing so promotes consistency, implementation effectiveness, and audit quality.

Taken together, these principles would help ensure the final Strategic Plan advances investor protection and audit quality in a manner that is effective, sustainable, transparent, and responsive to an evolving marketplace.

We would welcome continued dialogue with the Board and its staff as the strategic planning process moves forward.

If you would like to discuss our comments further, please contact Michael Stevenson (mstevenson@bdo.com), Marcy Johnson (marcy.johnson@bdo.com), or Lillian Ceynowa (lceynowa@bdo.com) regarding our submission.

**Respectfully submitted,**

BDO USA, P.C.

cc:

**PCAOB**

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