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September 4, 2026

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

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

Dear Members of the Public Company Accounting Oversight Board:

Thank you for the opportunity to comment on the Public Company Accounting Oversight Board's (PCAOB or Board) Draft 2026-2030 Strategic Plan Goals and Objectives (the Strategic Plan). We appreciate the Board's continued commitment to protecting investors and advancing audit quality. Overall, we support the Strategic Plan, and we appreciate the transparent efforts of the PCAOB to gather input from stakeholders on this important document.

Our comments herein focus on Goal 1, *Modernize Standard Setting and Implementation*, and Goal 4, *Deepen Stakeholder Engagement and Communications*. This letter should be read in conjunction with our recent responses to the Board's *Strategic Priorities* Request for Comment, dated May 15, 2026[1] and the Board's *Request for Public Comment on PCAOB Standard Setting* dated August 7, 2026.[2]

Goals 1 and 4 are closely aligned with key objectives of the ASB's 2026-2030 Strategic Plan,[3] including advancing high-quality standards through a transparent, research-informed, principles-based standard-setting process and fostering meaningful engagement with a broad range of stakeholders. These shared priorities create a strong foundation for ongoing collaboration between our organizations as we work toward advancing audit quality and serving the public interest.

Goal 1: Modernize Standard Setting and Implementation

We support the Board's objective of modernizing its standard-setting process, and as discussed in our August 7th letter, we believe this effort presents an important opportunity to establish a durable framework that promotes transparency, consistency, and accountability. We continue to encourage the PCAOB to develop and publicly articulate a conceptual framework that describes its overall approach to standard setting, priority setting, implementation, and post-implementation evaluation. A well-designed framework, like the one we suggested in our prior August 7th letter, can provide a stable reference point for decision making and help

[1] Letter from the AICPA to the PCAOB dated May 15, 2026, responding to Question 5 of the Board's Request for Public Comment, *PCAOB Strategic Priorities*, PCAOB Release No. 2026-001 (March 31, 2026).
[2] Letter from the AICPA to the PCAOB dated August 7, 2026, responding to the PCAOB's *Request for Public Comment on PCAOB Standard Setting,* PCAOB Release No. 2026-005 (June 23, 2026).
[3] [AICPA Auditing Standards Board Strategic Plan 2026-2030]

stakeholders understand why projects are undertaken, how alternatives are evaluated, and when differences from other standards are warranted.

As the Board advances Goal 1, we encourage a principles-based approach that is applied throughout the standard-setting lifecycle, from project identification and research through exposure, adoption, implementation, and post-implementation review. Such an approach should be informed by robust research, economic analysis, stakeholder outreach, and transparent deliberations. Effective standards should be clear, understandable, operable, capable of consistent application, scalable, risk-focused, inspectable, and enforceable.

We also encourage the Board to maintain a strong focus on implementation. Effective standards require sufficient implementation time and educational support, followed by post-implementation feedback and review to evaluate how they operate in practice. In addition, these reviews can provide valuable insight into whether standards are achieving their intended objectives and help identify unintended consequences or areas requiring further refinement. In addition, ensuring a feedback loop between standards and inspections will serve to help assess whether guidance or clarification in standards is needed. These activities help ensure that standards continue to serve the public interest and deliver the intended outcomes.

To further support implementation and continuous improvement, we encourage the PCAOB to leverage data and technology to identify emerging audit risks, prioritize standard-setting activities, and analyze inspection, enforcement, and stakeholder feedback. These capabilities can help the Board identify recurring issues that may warrant guidance or future standard setting and develop comparative resources that explain differences among PCAOB standards, Generally Accepted Auditing Standards (GAAS), and the International Standards on Auditing (ISAs). Collectively, these efforts can support informed, evidence-based decision making and advance the Strategic Plan.

Finally, we support the Board's efforts to engage with other standard setters and leverage existing work where appropriate. Please refer to our August 7th letter, outlining our views regarding the PCAOB's overall model for alignment, and why we believe the more effective path is to anchor PCAOB standards to the converged GAAS baseline, thereby aligning in substance with the ISAs. A "GAAS-as-baseline plus PCAOB plus/minus" model[4] as appropriate for the issuer environment, would promote clarity, reduce complexity, and lower compliance costs while preserving the PCAOB's regulatory authority.

Goal 4: Deepen Stakeholder Engagement and Communications

We strongly support the Board's focus on stakeholder engagement and communications. Meaningful engagement strengthens the quality of regulatory decision making, promotes transparency, and contributes to confidence in the standard-setting process.

Stakeholder engagement is most effective when it occurs throughout the lifecycle of a project rather than only during formal comment periods. Research activities, advisory groups, task

[4] Under this model, as shared in our August 7th letter to the PCAOB, ISA-based GAAS would serve as the baseline for PCAOB standards and the PCAOB would add to or modify that baseline.

forces, roundtables, targeted outreach, and public meetings provide valuable opportunities to obtain diverse perspectives, identify practical implementation considerations, and improve the quality of decision making. These activities also help stakeholders better understand the issues under consideration and contribute to more informed feedback. The PCAOB has previously undertaken outreach efforts in advance of drafting changes to standards, and we think this is very useful and would encourage the PCAOB to continue these efforts.

In addition, providing sufficient time for stakeholder feedback remains critical when considering proposed standards. As noted in our August 7th letter, substantive proposals generally benefit from comment periods that permit stakeholders to fully analyze proposed changes, assess implementation implications, and develop thoughtful responses. Adequate outreach and consultation ultimately contribute to higher-quality standards and more effective implementation.

We also believe it is important for the Board to continue enhancing transparency in its communications regarding its priorities, project selection criteria, research activities, and the basis for significant decisions. Stakeholders benefit when the Board clearly explains the rationale for its conclusions, including why particular alternatives were selected and why differences from other standards may be necessary. Such transparency strengthens accountability and facilitates meaningful participation in the standard-setting process.

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We appreciate the Board's consideration of these perspectives. We would welcome the opportunity to meet with the Board and PCAOB staff to discuss these views further and to share insights from the ASB's experience in standard setting, stakeholder engagement, and collaboration with other standard setters.

Sincerely,

Jennifer Burns

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Halie Creps
Chair, AICPA Auditing Standards Board

cc:
Kurt Hohl, Chief Accountant, U.S. Securities and Exchange Commission
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