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September 4, 2026

By email: comments@pcaobus.org

Ms. Phoebe W. Brown
Office of the Secretary
PCAOB
1666 K Street NW
Washington, DC 20006-2803

Re: Request for Public Comment on the Draft 2026-2030 Strategic Plan Goals and Objectives (PCAOB Release No. 2026-006)

Dear Ms. Brown:

Crowe LLP is pleased to submit these comments to the Public Company Accounting Oversight Board (PCAOB or the Board) in response to its request for input regarding the PCAOB's Draft 2026-2030 Strategic Plan Goals and Objectives (Strategic Plan). We appreciate the Board's continued engagement with stakeholders throughout the strategic planning process and are pleased to build on our prior comments on the PCAOB's strategic priorities as the Board works to finalize its Strategic Plan.

We are committed to performing high quality audits to support investor confidence and the integrity of the capital markets. We believe a diverse audit market, including the participation of mid-market firms, supports issuer and broker and dealer choice and contributes to the resilience of the broader audit ecosystem. As the PCAOB develops and executes on its Strategic Plan, we encourage the Board to consider how proposed programs and initiatives may affect firms of varying sizes and structures and the continued competitiveness and resilience of the audit market. We also encourage the Board to prioritize stability in addition to clarity and consistency as pillars of effective regulation. Stability in standard setting, inspections, and oversight strengthens the audit.

We appreciate the opportunity to provide these comments to the PCAOB as we all work to enhance audit quality for the benefit of investors.

<u>Modernize Standard Setting and Implementation</u>

We are supportive of the objectives outlined under Goal 1 related to modernization of standard setting and implementation. The professional standards set by the PCAOB, including auditing, quality control, and independence, are the foundation for high-quality audits. We agree that the PCAOB's standard-setting program should be transparent, advance investor protection, and produce standards that are clear and implementable. We also commend the Board for prioritizing effective implementation of new and existing standards.

While advancing Objectives 1.1, *Establish a Framework for High-Quality Standard Setting,* and 1.4, *Advance Responsive, Risk-Based Standard-Setting Priorities,* we encourage the Board to prioritize projects where there is the greatest identified need and a clear connection between the proposed action and an expected improvement in audit quality. Standard setting should only be undertaken when there is a clearly defined need for a new or revised standard. When there is not a defined need for a new standard, guidance or targeted clarifying amendments to existing standards may be a more effective approach to improve audit quality.

We support the PCAOB aligning, to the extent possible, with other standard setters on current and future standard-setting projects. We encourage the Board to engage with these standard setters as early and sustained engagement could help minimize unnecessary differences in requirements and terminology. Where appropriate, the Board should leverage the research, outreach, and technical analysis already performed by other standard setters to avoid unnecessary duplication of effort and allow PCAOB resources to remain focused on matters unique to the public company auditing environment. When the Board determines that differences from the standards of other standard setters are necessary, it should clearly articulate the rationale for those differences so that stakeholders better understand how the Board balanced investor protection, implementation considerations, and the U.S. legal and regulatory framework.

Objective 1.4 states that the Board intends to use its oversight activities to anticipate risk and prioritize high-quality standard setting. The PCAOB's programs – including standard setting, inspections, enforcement, and outreach – generate substantial information about current and past auditor conduct, but that information is not inherently forward-looking. We encourage the Board to provide additional transparency regarding the methodology it will use to translate insights from its oversight activities into anticipation of emerging risks, which would also help stakeholders understand how best to contribute relevant information to that process.

For additional comments related to modernizing standard setting and implementation, refer to our comment letter dated August 6, 2026 responding to the PCAOB's Request for Public Comment on PCAOB Standard Setting.

Modernize the Inspections and Registration Programs

We believe the PCAOB's inspections program has been key to improvements in audit quality since the PCAOB's inception. The Board's second strategic goal – modernizing the inspection and registration programs to improve their effectiveness, timeliness, and transparency – can serve to further enhance audit quality and contribute to investor protection.

We are supportive of Objective 2.1, *Focus Inspections on Firms' Systems of Quality Control,* and consideration of an inspection model that places greater emphasis on firms' systems of quality control (QC) as a means of generating more meaningful insights for stakeholders. We noted, however, that the objective includes:

> Inspections will evaluate whether firms' quality control systems *effectively identify and address risks to audit quality*, remediate deficiencies in a timely manner, and prevent their recurrence. (emphasis added)

QC 1000, *A Firm's System of Quality Control,* clearly articulates a firm's responsibilities and requirements in designing, implementing and operating a QC system, including the risk assessment process. We note that the QC system consists of establishing quality objectives, identifying and assessing quality risks to the achievement of the quality objectives, and designing and implementing quality responses to address the quality risks. Quality objectives, quality risks, and quality responses are the building blocks of the QC system to ultimately enable the firm to achieve the reasonable assurance objective. QC 1000 does not, however, describe the firm's responsibilities in relation to the term "audit quality." Using different terminology could create uncertainty around the criteria against which firms' QC systems will be evaluated. We encourage the PCAOB to leverage the objective and requirements of QC 1000 when describing a QC-focused inspection program, both within the Strategic Plan and as the revised inspection program is developed, so all stakeholders have a common understanding and expectations of the inspection program.

Objective 2.2, *Improve Inspection Report Clarity and Timeliness*, includes that the Board intends to engage stakeholders to improve the relevance, transparency, and timeliness of inspection reporting. We believe this engagement is a critical step for the Board to take as it evaluates opportunities to modernize its inspection reporting. We encourage the Board to continue engaging stakeholders throughout the development and implementation of reporting changes. We also encourage the Board to evaluate whether a single inspection report format is effective in communicating with all stakeholders, or whether different reporting formats, frequencies, and content may better meet the needs of the range of stakeholders.

Deepen Stakeholder Engagement and Communication

Objective 4.1, *Strengthen Stakeholder Engagement to Inform Oversight Priorities and Communications,* lays out an important objective to enhance the PCAOB's ability to achieve its goals. We encourage the Board to foster a robust feedback loop among its standard-setting, inspections, enforcement, and stakeholder engagement activities so that insights gained through one program meaningfully inform the others.

Modernize Oversight Through Technology and Data

We support the Board's goal to modernize its oversight activities through the use of technology and data. We noted, however, that the objectives outlined under Goal 5 appear to be primarily focused on enhancing the PCAOB's internal processes and capabilities. We believe there is an opportunity for the Board to consider how technology and data can also improve transparency, accessibility, and usability of the Board's data for external stakeholders. For example, providing certain inspections-related information in structured, downloadable datasets, where appropriate, would allow investors, audit committees, issuers, academics, and other stakeholders to more efficiently identify trends, perform comparative analyses, and better understand inspection outcomes. We believe initiatives such as these would complement the Board's broader transparency objectives and enhance the value of publicly available PCAOB information.

Measuring Strategic Plan Progress

We also support the draft Strategic Plan's commitment to accountability and transparency. We applaud Chairman Logothetis' statement in his remarks on the draft strategic goals and objectives that the Board will report quarterly progress against the final strategic plan. Communicating information relative to the Board's progress on its strategic goals and objectives will provide useful information to stakeholders and can support more informed, relevant engagement with the PCAOB.

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We appreciate the opportunity to provide our perspectives on the PCAOB's draft strategic plan goals and objectives and would be pleased to discuss our comments with the Board or its staff. If you have any questions, please contact Matthew Schell, National Office Managing Partner, at matthew.schell@crowe.com or Kyle Owens, Chief Auditor, at kyle.owens@crowe.com.

Sincerely,

/s/ Crowe LLP

Crowe LLP