September 4, 2026

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

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

Dear Ms. Brown,

This letter is submitted by Financial Executives International's ("FEI") Committee on Corporate Reporting ("CCR") in response to the Public Company Accounting Oversight Board's ("PCAOB" or "Board") request for comment on its Draft 2026-2030 Strategic Plan Goals and Objectives (the "Draft Strategic Plan").[1]

FEI is a leading international organization composed of members who hold positions as Chief Financial Officers, Chief Accounting Officers, Controllers, Treasurers and Tax Executives at companies in every major industry. CCR is FEI's technical committee of approximately 50 Chief Accounting Officers ("CAOs") and Corporate Controllers from Fortune 100 and other large public companies, representing more than $19 trillion in market capitalization. CCR reviews and responds to pronouncements, proposed rules and regulations, pending legislation, and other documents issued by domestic and international regulators and organizations such as the SEC, PCAOB, FASB, and IASB.

The enclosed views and recommendations set forth within this letter were developed in accordance with CCR's governance procedures. This process includes multiple iterative reviews by a drafting committee composed of member company CAOs, Controllers and their direct reports. As noted, CCR is composed of the largest public companies across a diverse array of industries – each with unique regulatory challenges and varying priorities. The perspectives incorporated in this letter reflect areas of consensus across committee members and may not align with the specific views of every individual entity or industry group.

Executive Summary

CCR commends the PCAOB for issuing its Draft Strategic Plan for public comment and welcomes the opportunity to share its views on the goals and objectives set forth. This letter builds upon the positions CCR has previously shared with the Board, including its May 15, 2026, comment letter on the Board's strategic priorities ("Strategic Priorities Letter")[2] and its August 7, 2026, comment letter on the Board's standard-setting and research agendas ("Standard-Setting Letter" together with the Strategic Priorities Letter, "CCR's Prior Letters")[3], both of which inform CCR's views below. While much of this letter reflects CCR's prior positions, it also offers new perspectives on certain goals and objectives not previously addressed. CCR's views below are organized by goal and focus on those most directly relevant to CCR members. Goals and objectives not addressed within this

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[1] PCAOB, Request for Public Comment on Draft 2026-2030 Strategic Plan Goals and Objectives (PCAOB No. 2026-006) (July 20, 2026), available at https://assets.pcaobus.org/pcaob-dev/docs/default-source/about/administration/documents/strategic_plans/2026-006-rfc-sp.pdf.

[2] FEI Committee on Corporate Reporting, Comment Letter on PCAOB Strategic Priorities (May 15, 2026), available at https://assets.pcaobus.org/pcaob-dev/docs/default-source/about/administration/strategic-plan-comments-2026/57_fei.pdf.

[3] FEI Committee on Corporate Reporting, Comment Letter on PCAOB Standard Setting (PCAOB No. 2026-005) (August 7, 2026), available at https://assets.pcaobus.org/pcaob-dev/docs/default-source/standards/standard-setting-agenda-request-for-comment/26_fei-ccr.pdf.

letter or CCR's Prior Letters do not reflect current priorities for comment. CCR's positions are summarized as follows:

Goal 1 (Modernize Standard Setting and Implementation): CCR reaffirms its support, as set forth in CCR's Prior Letters, for a principles-based approach to standard setting, including the development of a formal conceptual framework to promote more consistent and durable standards, and its previously identified standard-setting priorities. CCR offers a new perspective on the importance of applying broadly consistent standards across audit firms of all sizes, while believing that how the Board enforces those standards should be calibrated to an audit firm's size, scale and risk profile. CCR also encourages the Board to remain mindful of the complexity of standard setting involving AI and other new technologies, and to weigh international requirements when evaluating new standards.

Goal 2 (Modernize the Inspections and Registration Programs): CCR is encouraged by the Board's swift formation of the Inspections Modernization Council and reaffirms its support, as expressed in CCR's Prior Letters, for additional focus on firm-level quality controls to inform the scope and extent of inspection procedures. CCR further recommends the PCAOB consider a mechanism for distinguishing the relative severity of Part I.A deficiencies, as such deficiencies are currently presented without differentiation between more and less serious findings, and encourages the Board to improve the timeliness of inspection reports. CCR also recommends the Board further support the firms' exercise of professional judgment in tailoring audit procedures to the facts and circumstances of a given engagement and encourages the Board to similarly calibrate its inspection approach to risk, such that inspections reinforce auditor judgment.

Goal 4 (Deepen Stakeholder Engagement and Communication): CCR reaffirms the importance of two-way engagement between the Board and its stakeholders, consistent with its prior recommendation for cross-stakeholder roundtables. CCR additionally recommends the Board consider specific mechanisms to help realize this goal, including greater use of existing forums such as the Investor Advisory Group ("IAG") and Standards and Emerging Issues Advisory Group ("SEIAG"), and that any such engagement specifically includes preparers, rather than aggregating preparer input together with other stakeholder groups more broadly. Strengthening communication with audit firms, whom preparers engage with regularly, would similarly support this goal.

Goal 5 (Modernize Oversight Through Technology and Data): CCR encourages the Board's investment in data and technology capabilities that would support greater consistency in the application of audit standards across its inspections program, while maintaining appropriate safeguards to protect the confidentiality of company data.

Goal 6 (Strengthen Organizational Effectiveness and Stewardship): CCR encourages the Board to invest in the technology, tools and processes necessary to operate as a modern, digitally advanced organization. Given CCR members' experience attracting, retaining and developing talent at large, complex organizations, CCR stands ready to share its members' perspectives on talent strategy with the Board, if helpful.

CCR's positions on each of the foregoing goals are addressed in further detail below.

Goal 1: Modernize Standard Setting and Implementation

CCR reaffirms its recommendation, as set forth in its Standard-Setting Letter, that the Board develop a formal conceptual framework to guide its standard-setting process. CCR believes such a framework would directly support Objectives 1.1 and 1.4 by establishing a stable, principles-based foundation for evaluating when and how the Board should act, and by helping the Board apply consistent judgment as it identifies and prioritizes emerging standard-setting needs. CCR also reaffirms the standard-setting priorities identified in its Standard-Setting Letter, including its recommendations regarding materiality, data and technology and the continued relevance of CAM disclosures.

Applying broadly consistent standards across audit firms of all sizes, including large, mid-size and small firms, supports audit quality by ensuring auditors are held to a consistent standard. CCR believes, however, that how the

Board enforces those standards, including through inspections, should be calibrated to a firm's size, scale and risk profile. More broadly, CCR encourages the Board to continue considering how its standard-setting activities affect all stakeholders, including preparers, given that audit standards shape the audit experience for preparers as well. CCR would welcome the opportunity to share its perspective as helpful.

Additionally, as the Board considers standard-setting involving AI and other new technologies, CCR encourages it to remain mindful of the complexity of this evolving area, given that preparers, auditors and regulators alike continue to develop their understanding of these technologies and are in the process of implementing them. CCR also encourages the Board to weigh international requirements when evaluating new standards, particularly where misalignment could create incremental compliance complexity for global organizations.

Goal 2: Modernize the Inspections and Registration Programs

CCR is encouraged by the Board's swift formation of the Inspections Modernization Council, which reflects a clear recognition of the need to evolve the PCAOB's inspections program. CCR further reaffirms its support, as expressed in CCR's Prior Letters, for additional focus on firm-level quality controls to inform the scope and extent of inspection procedures, consistent with Objective 2.1.

With respect to Objective 2.2, CCR reaffirms the challenges previously noted in the Strategic Priorities Letter regarding the use of inspection reports in communications with audit committees and recommends the PCAOB consider a mechanism for distinguishing the relative severity of Part I.A deficiencies, which could be in the form of a quantitative or qualitative supplement. As currently presented, Part I.A deficiencies carry no indication of relative severity, and preparers and audit committees are left to compare deficiency rates across firms without a reliable basis for assessing whether a higher rate reflects more serious findings. CCR understands that the Board and its Staff often discuss such distinctions in certain settings, and CCR encourages the Board to consider how that same depth of understanding could be reflected directly in the reports themselves. CCR believes the usefulness of inspection reports is also enhanced by their timeliness and encourages the Board to complete and issue reports more promptly.

CCR recommends the Board further support the firms' exercise of professional judgment in tailoring audit procedures to the facts and circumstances of a given engagement. Relatedly, CCR encourages the Board to similarly calibrate its inspection approach to risk, such that inspections reinforce auditor judgment and help ensure the scope and cost of inspection-related activities remain proportionate to the risks presented.

Goal 4: Deepen Stakeholder Engagement and Communication

CCR reaffirms the importance of two-way engagement between the Board and its stakeholders, consistent with Objective 4.1 and CCR's prior recommendation for cross-stakeholder roundtables. CCR and its members value active participation in forums with other standard setters and industry groups and would welcome the opportunity to participate in other forums or channels the Board may establish. CCR believes the impact of this goal will depend on the specific structures the Board puts in place to achieve it, and recommends the Board consider making greater use of existing forums such as the IAG and SEIAG. CCR further recommends that any such engagement specifically includes preparers, rather than aggregating preparer input together with other stakeholder groups more broadly. CCR also encourages the Board to strengthen its communication with audit firms, whom preparers engage with regularly, though this should not replace direct engagement with preparers. Each stakeholder group offers a distinct perspective that the Board should continue to draw on.

Goal 5: Modernize Oversight Through Technology and Data

CCR encourages the Board's investment in the data and technology capabilities described under this goal, particularly to support the Board's ability to identify patterns and apply lessons learned consistently across its inspections program. CCR believes such capabilities would meaningfully advance consistency in the application of audit standards.

While CCR supports the Board's use of data and technology in conducting its oversight and strengthening its analytical and risk assessment capabilities, CCR strongly emphasizes the importance of maintaining robust safeguards over the confidentiality of company data obtained in the course of its oversight activities.

Goal 6: Strengthen Organizational Effectiveness and Stewardship

CCR encourages the Board to invest in the technology, tools and processes necessary to operate as a modern, digitally advanced organization, consistent with Objective 6.1. CCR believes such investment would further support the consistency in the application of audit standards discussed under Goal 5 above.

CCR's members lead large and complex organizations and bring experience attracting, retaining and developing talent, consistent with Objective 6.2. CCR's members would welcome the opportunity to discuss their perspectives with the Board on its approaches to talent strategy, if helpful.

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CCR appreciates the PCAOB's consideration of its perspectives and welcomes the opportunity to discuss the views set forth in this letter with the Board. CCR stands ready to support the Board as it finalizes its Strategic Plan and looks forward to continued engagement as the Board advances its goals and objectives.

Sincerely,

Committee on Corporate Reporting

Committee on Corporate Reporting (FEI)