Texas Society of Certified Public Accountants

August 25, 2026

PCAOB
Office of the Secretary
1666 K Street, NW
Washington, DC 20006-2803

Email: comments@pcaobus.org

RE: PCAOB No. 2026-006

We appreciate the opportunity to provide feedback on PCAOB Release No. 2026-006, *Request for Public Comment on PCAOB's Draft 2026-2030 Strategic Plan Goals and Objectives*, dated July 20, 2026 (the Plan). The Plan has been organized around three reinforcing priorities: 1) Advance Audit Quality and Investor Protection, 2) Clarify Expectations and Our Bases for Decisions Leading to Understandable Outcomes, and 3) Transform How Oversight is Delivered.

The views expressed herein are written on behalf of the Professional Standards Committee (PSC) of the Texas Society of CPAs. The committee has been authorized by the Texas Society of CPAs' Leadership Council to submit comments on matters of interest to the membership. The views expressed in this document have not been approved by the Texas Society of CPAs' Leadership Council or Board of Directors and, therefore, should not be construed as representing the views or policy of the Texas Society of CPAs.

The PSC is supportive of PCAOB's Draft 2026-2030 Strategic Plan, including stated reinforcing priorities, goals and objectives.

As the Board undertakes the refinement of its strategic goals and objectives, the PSC reiterates for the Board's consideration all recommendations included in our comment letters relating to strategic priorities and standard setting dated May 11, 2026[1] and August 5, 2026[2], respectively.

In addition, the PSC would like to highlight comments relating to the following specific goals.

**Goal 2: Modernize the Inspections and Registration Programs:**

- Objective 2.3 of the Plan states that "We intend to revise how we evaluate and report on inspection-identified deficiencies in firms' quality control systems and firm remediation activities by supporting more timely monitoring and assessment of remedial actions and whether firms' quality control systems effectively identify, correct, and prevent recurrence of such deficiencies." Timeliness and transparency of disclosures in firms' systems of quality-control-focused inspection reports must be balanced with thorough due process and accuracy. As audit firms depend on reputation, a premature public allegation could create unintended harm resulting in irreversible damage to a firm even if alleged serious deficiencies are subsequently reclassified or withdrawn.

- As stated in our comment letter dated May 11, 2026[1], the PSC recommends developing and publishing an enhanced framework to better distinguish severe deficiencies from less severe deficiencies, including revised definitions of Part 1A and Part 1B deficiencies.

[1]https://www.tx.cpa/news/latest-news/news/article/2026/05/13/psc-comments-on-proposed-pcaob-strategic-priorities
[2]https://www.tx.cpa/news/latest-news/news/article/2026/08/07/psc-provides-feedback-on-pcaob-s-proposed-standard-setting-priorities

- The PSC generally supports the Board's pivot to primarily quality-control systems focused on inspections. In order to further enhance the Board's focus on firms' systems of quality control, as stated in our comment letter dated May 11, 2026[1], the PSC recommends qualification screening procedures be designed and implemented as part of the firm's initial registration process. Assessing whether a prospective firm has an adequate initial quality-control system before approving registration will allow the PCAOB to identify structural weaknesses earlier, reduce the likelihood of deficient audits reaching investors, and support audit firms in developing sustainable issuer-audit capabilities aligned with PCAOB expectations.

**Goal 4: Deepen Stakeholder Engagement and Communication:**

- As discussed in our comment letter dated August 5, 2026[2], the PSC recommends that the PCAOB prioritize seeking input from small and mid-size firms on a formalized basis to ensure adequate consideration is given to the unique implementation issues of these firms, including economic benefits, costs, competitive effects, and unintended consequences in any standard-setting projects.

We appreciate the opportunity to submit comments on the proposed PCAOB No. 2026-006, *Request for Public Comment on PCAOB's Draft 2026-2030 Strategic Plan Goals and Objectives.*

Sincerely,

Jeffrey L Johanns

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Texas Society of Certified Public Accountants