
2019 Inspection BKD, LLP

(Headquartered in Springfield, Missouri)

September 21, 2021

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2019 Inspection

During the Public Company Accounting Oversight Board (“PCAOB”)’s 2019 inspection of BKD, LLP, we assessed the firm’s compliance with laws, rules, and professional standards applicable to the audits of public companies.

We selected for review seven audits of issuers with fiscal years generally ending in 2018. For each issuer audit selected, we reviewed a portion of the audit. We also evaluated elements of the firm’s system of quality control.

2019 Inspection Approach

In selecting issuer audits for review, we use a risk-based method of selection. We make selections based on (1) our internal evaluation of audits we believe have a heightened risk of material misstatement, including those with challenging audit areas, and (2) other risk-based characteristics, including issuer and firm considerations. In certain situations we may select all of the firm’s issuer audits for review.

When we review an audit, we do not review every aspect of the audit. Rather, we generally focus our attention on audit areas we believe to be of greater complexity, areas of greater significance or with a heightened risk of material misstatement to the issuer’s financial statements, and areas of recurring deficiencies. We may also select some audit areas for review in a manner designed to incorporate unpredictability.

Our selection of audits for review does not constitute a representative sample of the firm’s total population of issuer audits. Additionally, our inspection findings are specific to the particular portions of the issuer audits reviewed. They are not an assessment of all of the firm’s audit work nor of all of the audit procedures performed for the audits reviewed.

View the details on the [scope of our inspections and our inspections procedures](#).

Overview of the 2019 Inspection and Historical Data by Inspection Year

The following information provides an overview of our inspection in 2019 of the firm's issuer audits as well as data from the previous inspection. We use a risk-based method to select audits for review and to identify areas on which we focus our review. Because our inspection process evolves over time, it can, and often does, focus on a different mix of audits and audit areas from inspection to inspection and firm to firm. Further, a firm's business, the applicable auditing standards, or other factors can change from the time of one inspection to the next. As a result of these variations, we caution that our inspection results are not necessarily comparable over time or among firms.

Firm Data and Audits Reviewed

	2019	2016
Firm Data		
Total issuer audit clients for which the firm was the principal auditor at the outset of the inspection procedures	69	72
Total engagement partners on issuer audit work¹	30	32
Audits Reviewed		
Total audits reviewed²	7	8
Audits in which the firm was the principal auditor	7	8
Integrated audits of financial statements and internal control over financial reporting ("ICFR")	6	6
Audits with Part I.A deficiencies	4	2

If a deficiency is included in Part I.A of our report, it does not necessarily mean that the firm has not addressed the deficiency. In many cases, the firm has performed remedial actions after the issue was identified. Depending on the circumstances, remedial actions may include performing additional audit procedures, informing management of the issuer of the need for changes to the financial statements or reporting on ICFR, or taking steps to prevent reliance on prior audit reports. Our inspection may include a

¹ The number of engagement partners on issuer audit work represents the total number of firm personnel (not necessarily limited to personnel with an ownership interest) who had primary responsibility for an issuer audit (as defined in AS 1201) during the twelve-month period preceding the outset of the inspection.

² The population of issuer audits from which audits are selected for review may differ from the issuer audits at the outset of the inspection procedures due to variations such as new issuer audit clients for which the firm has not yet issued an opinion or issuer audit clients lost prior to the outset of the inspection.

review, on a sample basis, of the adequacy of a firm's remedial actions, either with respect to previously identified deficiencies or deficiencies identified during the current inspection. If a firm does not take appropriate actions to address deficiencies, we may criticize its system of quality control or pursue a disciplinary action.

The fact that we have included a deficiency in our report — other than those deficiencies for audits with incorrect opinions on the financial statements and/or ICFR — does not necessarily mean that the issuer's financial statements are materially misstated or that undisclosed material weaknesses in ICFR exist. It is often not possible for us to reach a conclusion on those points based on our inspection procedures and related findings because, for example, we have only the information that the auditor retained and the issuer's public disclosures. We do not have direct access to the issuer's management, underlying books and records, and other information.

Audit Areas Most Frequently Reviewed

This table reflects the audit areas we have selected most frequently for review in the 2019 inspection and the previous inspection. For the issuer audits selected for review, we selected these areas because they were generally significant to the issuer's financial statements, may have included complex issues for auditors, and/or involved complex judgments in (1) estimating and auditing the reported value of related accounts and disclosures and (2) implementing and auditing the related controls.

2019		2016	
Audit area	Audits reviewed	Audit area	Audits reviewed
Allowance for loan losses	4	Investment securities	6
Investment securities	3	Allowance for loan losses	4
Loans and related accounts	1	Participant and employer contributions	2
Deposit liabilities	1	Long-lived assets	1
Revenue and related accounts	1	Revenue and related accounts	1

Part I: Inspection Observations

Part I.A of our report discusses deficiencies, if any, that were of such significance that we believe the firm, at the time it issued its audit report(s), had not obtained sufficient appropriate audit evidence to support its opinion on the issuer's financial statements and/or ICFR. Part I.B discusses deficiencies, if any, that do not relate directly to the sufficiency or appropriateness of evidence the firm obtained to support its opinion(s) but nevertheless relate to instances of non-compliance with PCAOB standards or rules. Consistent with the Sarbanes-Oxley Act ("the Act"), it is the Board's assessment that nothing in Part I of this report deals with a criticism of or potential defect in the firm's quality control system. Any such criticisms or potential defects are discussed in Part II. Further, you should not infer from any Part I deficiency or combination of deficiencies that a quality control finding is identified in Part II. Section 104(g)(2) of the Act restricts us from publicly disclosing Part II deficiencies unless the firm does not address the criticisms or potential defects to the Board's satisfaction no later than 12 months after the issuance of this report.

Classification of Audits with Part I.A Deficiencies

Within Part I.A of this report, we classify each issuer audit in one of the categories discussed below based on the Part I.A deficiency or deficiencies identified in our review.

The sole purpose of this classification system is to group and present issuer audits by the number of Part I.A deficiencies we identified within the audit as well as to highlight audits with an incorrect opinion on the financial statements and/or ICFR.

Audits with an Incorrect Opinion on the Financial Statements and/or ICFR

This classification includes instances where a deficiency was identified in connection with our inspection and, as a result, an issuer's financial statements were determined to be materially misstated, and the issuer restated its financial statements. It also includes instances where a deficiency was identified in connection with our inspection and, as a result, an issuer's ICFR was determined to be ineffective, or there were additional material weaknesses that the firm did not identify, and the firm withdrew its opinion, or modified its report, on ICFR. This classification does not include instances where, unrelated to our review, an issuer restated its financial statements and/or an issuer's ICFR was determined to be ineffective. Any deficiencies identified in connection with our reviews of these audits would be included in the audits with multiple deficiencies or audits with a single deficiency classification below.

Audits with Multiple Deficiencies

This classification includes instances where multiple deficiencies were identified that related to a combination of one or more financial statement accounts, disclosures, and/or important controls in an ICFR audit.

Audits with a Single Deficiency

This classification includes instances where a single deficiency was identified that related to a financial statement account or disclosure or to an important control in an ICFR audit.

Part I.A: Audits with Unsupported Opinions

This section of our report discusses the deficiencies identified, by specific issuer audit reviewed, in the audit work supporting the firm's opinion on the issuer's financial statements and/or ICFR.

We identify each issuer by a letter (e.g., Issuer A). Each deficiency could relate to several auditing standards, but we reference the PCAOB standard(s) that most directly relates to the requirement with which the firm did not comply.

Issuer audits are presented below within their respective deficiency classifications (as discussed previously). Within the classifications, we generally present the audits based on our assessment as to the relative significance of the identified deficiencies taking into account the significance of the financial statement accounts and/or disclosures affected, and/or the nature or extent of the deficiencies.

Audits with an Incorrect Opinion on the Financial Statements and/or ICFR

None

Audits with Multiple Deficiencies

Issuer A

Type of audit and related areas affected

In our review, we identified deficiencies in the financial statement and ICFR audits related to **Revenue** and **Certain Receivables**.

Description of the deficiencies identified

With respect to **Revenue**:

The issuer processed and recorded revenue transactions using its general ledger system. The firm tested certain automated and information technology ("IT")-dependent manual controls that used data and reports generated by or maintained in the general ledger system. The firm's approach to test the accuracy and completeness of these data and reports depended on effective IT general controls ("ITGCs"). In response to an ineffective ITGC over the issuer's general ledger system, the firm selected for testing a compensating control that consisted of a review of system changes. The firm did not evaluate the review procedures that the control owner performed, including the procedures to identify items for follow up and the procedures to determine whether those items were appropriately resolved. As a result, the firm's testing of these automated and IT-dependent manual controls over these areas was not sufficient. (AS 2201.46 and .68)

The firm selected for testing two controls over the review of revenue. The firm did not evaluate the review procedures that the control owners performed, including the procedures to identify items for follow up and the procedures to determine whether those items were appropriately resolved. Further, the firm did not perform procedures to test whether the controls were operating as designed. (AS 2201.42 and .44)

The firm selected a sample of transactions to test that revenue was appropriately recognized. In its sample, the firm did not test certain aspects of the transactions, including valuation. (AS 2301.08)

With respect to **Certain Receivables**:

The firm sent positive confirmation requests as of an interim date. The firm did not test, or in the alternative, identify and test controls over, the completeness of the listing used to make its selections for confirmation. (AS 1105.10)

The firm performed alternative procedures for confirmations that were not returned by comparing selected amounts to a report of subsequent cash receipts compiled by the firm using issuer data. The firm did not test, or in the alternative, identify and test controls over, the accuracy and completeness of the issuer data the firm used to compile the cash receipts report. (AS 1105.10; AS 2310.33)

The firm did not test, or in the alternative, identify and test controls over, the accuracy and completeness of the issuer data used in its roll forward procedures performed from the date of confirmation to year end. (AS 1105.10)

Issuer B – Financials

Type of audit and related areas affected

In our review, we identified deficiencies in the financial statement and ICFR audits related to the **Allowance for Loan Losses (“ALL”)** and **Deposits**.

Description of the deficiencies identified

With respect to the **ALL**:

The firm selected for testing several controls that consisted of reviews of aspects of the issuer’s loan portfolio to evaluate the reasonableness of loan grades and the identification of problem loans that management used in its evaluation of the ALL. The firm did not evaluate the specific criteria the control owners used to identify individual loans for follow up, and whether loans meeting such criteria were identified for investigation and resolved. (AS 2201.42 and .44)

With respect to **Deposits**:

The firm used the results from internal audit (“IA”)’s deposit confirmation testing for certain deposit accounts. The firm did not test any of the work performed by IA. (AS 2605.20-.21, .24, and .26)

Audits with a Single Deficiency

Issuer C – Benefit Plans

Type of audit and related area affected

In our review, we identified a deficiency in the financial statement audit related to **Investments**.

Description of the deficiency identified

The firm did not perform sufficient procedures to test investments because it selected for testing underlying investments from the issuer’s two largest funds, which was not representative of the population of investments. (AS 2315.24)

Issuer D – Financials

Type of audit and related area affected

In our review, we identified a deficiency in the financial statement audit related to **Loans**.

Description of the deficiency identified

The firm's approach for testing the issuer's loan portfolio consisted of sending positive confirmation requests for loans greater than a certain amount and negative confirmation requests for a sample of loans below that threshold. For loans below the threshold, the firm did not perform any other procedures to test the existence of those loans. (AS 2301.08)

Part I.B: Other Instances of Non-Compliance with PCAOB Standards or Rules

This section of our report discusses any deficiencies we identified that do not relate directly to the sufficiency or appropriateness of evidence the firm obtained to support its opinion(s) but nevertheless relate to instances of non-compliance with PCAOB standards or rules. When we review an audit, we do not review every aspect of the audit. As a result, the areas below were not necessarily reviewed on every audit. In some cases, we assess the firm's compliance with specific PCAOB standards or rules on other audits that were not otherwise selected for review and may include instances of non-compliance below.

The deficiencies below are presented in numerical order based on the PCAOB standard or rule with which the firm did not comply. We identified the following deficiencies:

- In six of seven audits reviewed, the firm did not communicate to the issuer's audit committee, or equivalent, all of the significant risks identified through its risk assessment procedures. In these instances, the firm was non-compliant with AS 1301, *Communications with Audit Committees*.
- In the audit reviewed where one or more other accounting firms participated in the firm's audit, the firm's report on Form AP omitted information related to the participation in the audit by other accounting firms. In this instance, the firm was non-compliant with PCAOB Rule 3211, *Auditor Reporting of Certain Audit Participants*.

Part II: Observations Related To Quality Control

Part II of our report discusses criticisms of, and potential defects in, the firm's system of quality control.

Deficiencies are included in Part II if an analysis of the inspection results, including the results of the reviews of individual audits, indicates that the firm's system of quality control does not provide reasonable assurance that firm personnel will comply with applicable professional standards and requirements. Generally, the report's description of quality control criticisms is based on observations from our inspection procedures.

Any changes or improvements to its system of quality control that the firm may have brought to the Board's attention may not be reflected in this report, but are taken into account during the Board's assessment of whether the firm has satisfactorily addressed the quality control criticisms or defects no later than 12 months after the issuance of this report.

Criticisms of, and potential defects in, the firm's system of quality control, to the extent any are identified, are nonpublic when the reports are issued. If a firm does not address to the Board's satisfaction any criticism of, or potential defect in, the firm's system of quality control within 12 months after the issuance of our report, any such deficiency will be made public.

Appendix A: Firm's Response to the Draft Inspection Report

Pursuant to section 104(f) of the Act, 15 U.S.C. § 7214(f), and PCAOB Rule 4007(a), the firm provided a written response to a draft of this report. Pursuant to section 104(f) of the Act and PCAOB Rule 4007(b), the firm's response, excluding any portion granted confidential treatment, is attached hereto and made part of this final inspection report.

The Board does not make public any of a firm's comments that address a nonpublic portion of the report unless a firm specifically requests otherwise. In some cases, the result may be that none of a firm's response is made publicly available.

In addition, pursuant to section 104(f) of the Act, 15 U.S.C. § 7214(f), and PCAOB Rule 4007(b), if a firm requests, and the Board grants, confidential treatment for any of the firm's comments on a draft report, the Board does not include those comments in the final report. The Board routinely grants confidential treatment, if requested, for any portion of a firm's response that addresses any point in the draft that the Board omits from, or any inaccurate statement in the draft that the Board corrects in, the final report.

July 22, 2021

Mr. George Botic, Director
Division of Registration and Inspections
Public Company Accounting Oversight Board
1666 K Street, N.W.
Washington, DC 20006

Re: Response to Part I of the Draft Report on the 2019 Inspection of **BKD, LLP**

Dear Mr. Botic:

We are pleased to submit our response to Part I of the Public Company Accounting Oversight Board's (the "PCAOB") Draft Report on the 2019 Inspection of **BKD, LLP** (the "Draft Report"). We continue to support the PCAOB's goal of improving audit quality for the benefit of investors and the public interest and believe the inspection process serves an important role in accomplishing this goal.

We are committed to the highest standards of audit quality and continually monitor our systems and processes, including quality control, and make changes to methodologies, policies, and procedures when we identify opportunities for improvement. We recognize the value in the PCAOB's inspection process as it helps us identify such opportunities to continue to improve the quality of our audits.

We have carefully evaluated the matters described in Part I of the Draft Report and have taken actions, as appropriate, to address each matter in accordance with PCAOB standards and our policies, including steps we considered necessary to comply with AS 2901, *Consideration of Omitted Procedures After the Report Date*, and where applicable, AS 2905, *Subsequent Discovery of Facts Existing at the Date of the Auditor's Report*.

We appreciate the opportunity to present this response and look forward to continuing to work with the PCAOB on improving audit quality and protecting the investing public.

Sincerely,

BKD, LLP

