

HIGH-LEVEL SUMMARY OF PUBLIC COMMENTS ON PCAOB STANDARD SETTING

On March 31, 2026, the Public Company Accounting Oversight Board (PCAOB or Board) issued [PCAOB Release No. 2026-001, Request for Public Comment on PCAOB Strategic Priorities](#) (“Strategic Priorities RFC”) to inform development of the PCAOB’s 2026–2030 strategic plan and future standard-setting focus areas. On June 23, 2026, the Board issued [PCAOB Release No. 2026-005, Request for Public Comment on PCAOB Standard Setting](#) (“Standard Setting RFC”), discussing certain comments received on the Strategic Priorities RFC and seeking more focused input on updating the standard-setting and research agendas. The PCAOB received over 30 comment letters in response to the Standard Setting RFC from a variety of stakeholders including investors, registered firms, academics, and accounting organizations.

This document was prepared by staff of the Office of the Chief Auditor to provide a high-level summary of the public comments received on the PCAOB’s standards-related activities in response to the Strategic Priorities RFC and the Standard Setting RFC. This document is not intended to be a complete summary of all the comments received, and individual commenters within a topic may hold different or more nuanced views. The term “commenters” means one or more comment letters and should not necessarily be construed to mean all or most commenters. For complete views expressed by commenters, please refer to individual comment letters available on the PCAOB’s website (see [Public Comments on PCAOB Strategic Priorities | PCAOB](#) and [Agenda Consultation - Request for Public Comment on PCAOB Standard Setting | PCAOB](#)).

Conceptual Framework for Standard Setting

TOPIC	SUMMARY OF COMMENTS
Conceptual Framework	Commenters supported an initiative to develop a conceptual framework and expressed a view that greater transparency throughout the PCAOB standard-setting process is needed. Commenters stated that PCAOB standards should be aligned with those of other standard setters (e.g., IAASB ¹ , ASB ²) where appropriate.

¹ International Auditing and Assurance Standards Board (IAASB). <https://www.iaasb.org/>

² AICPA Auditing Standards Board (ASB). <https://www.aicpa-cima.com/resources/landing/asb-auditing-standards-board>

Standard-Setting Projects

TOPIC	SUMMARY OF COMMENTS
Negative Assurance related to Comfort Letter Engagements <i>(AS 6101, Letters for Underwriters and Certain Other Requesting Parties)</i>	This project was included on the standard-setting agenda in May 2026 following the SEC's proposal on semiannual reporting. ³ Commenters expressed varying views on whether amendments to AS 6101 would be necessary and the extent of potential amendments in light of a possible SEC action.
Auditor Independence <i>(Interim Ethics and Independence Standards)</i>	Commenters supported a project on auditor independence. Commenters suggested modernizing the interim standards, including eliminating duplication or contradiction with requirements under the SEC independence rules. Commenters suggested consideration of the impact of newer firm ownership models on independence to address evolving threats to independence.
Fraud <i>(AS 2401, Consideration of Fraud in a Financial Statement Audit)</i>	Commenters supported standard setting to address evolving fraud schemes and technological developments, to strengthen risk assessment and professional skepticism related to fraud. Commenters emphasized this is critical to investor protection. Commenters suggested addressing fraud concurrently with noncompliance with laws and regulations, and to leverage recent work of the IAASB and ASB. ⁴
Noncompliance with Laws and Regulations <i>(AS 2405, Illegal Acts by Clients)</i>	Commenters supported a project to address a company's noncompliance with laws and regulations. Commenters cautioned against expanding auditor responsibilities beyond auditor competencies. Commenters suggested addressing the topic concurrently with fraud. Commenters also suggested aligning with the IAASB and ASB standards taking into account modifications for U.S. legal and regulatory environment. ⁵

³ See U.S. Securities and Exchange Commission (SEC) Proposal on *Semiannual Reporting*, SEC Rel. No. 33-11414 (May 5, 2026). <https://www.sec.gov/files/rules/proposed/2026/33-11414.pdf>.

⁴ See International Standard on Auditing (ISA) 240 (Revised), *The Auditor's Responsibilities Relating to Fraud in an Audit of Financial Statements*, effective for audits of financial statements for periods beginning on or after December 15, 2026 and Statement on Auditing Standards (SAS) No. 151, *The Auditor's Responsibilities Relating to Fraud in an Audit of Financial Statements*, effective for audits of financial statements for periods ending on or after December 15, 2028 (approved by the AICPA Auditing Standards Board on August 19, 2026).

⁵ See ISA 250 (Revised), *Consideration of Laws and Regulations in an Audit of Financial Statements*, and AU-C 250, *Consideration of Laws and Regulations in an Audit of Financial Statements*.

TOPIC	SUMMARY OF COMMENTS
Going Concern <i>(AS 2415, Consideration of an Entity's Ability to Continue as a Going Concern)</i>	Commenters suggested making targeted updates to the PCAOB standard on the going concern consideration, to address developments in the financial reporting frameworks and recent IAASB and ASB actions. ⁶

Research Projects

TOPIC	SUMMARY OF COMMENTS
Data & Technology	Commenters recommended continuing research on data and technology as a high priority and coordinating with other standard setters. Commenters suggested the PCAOB establish an “AI task force” or similar stakeholder group.
Firm and Engagement Performance Metrics (FEPMs)	Commenters’ views differed on reporting metrics. Some indicated that metrics are needed and provide decision-useful information to investors. Others expressed concerns over misinterpretation, costs, reliability, comparability, and the appropriate audience for metrics. Commenters supported further research and outreach on FEPMs.
Communications with Audit Committees	Commenters recommended modernizing AS 1301, <i>Communications with Audit Committees</i> , to promote more tailored, risk-focused, and decision-useful communications that align with the needs and expectations of today’s audit committees. Commenters suggested the PCAOB perform research and outreach with audit committees.

Post-Implementation Review

TOPIC	SUMMARY OF COMMENTS
Critical Audit Matters (CAMs) <i>(AS 3101, The Auditor’s Report on an Audit of Financial Statements When the Auditor Expresses an Unqualified Opinion)</i>	Commenters’ views differed on CAMs. Some supported targeted amendments to improve their content and decision-usefulness. In contrast, some indicated that CAM requirements are generally achieving their objective. Commenters generally expressed support for completing a post-implementation review or conducting further research.

Staff Guidance

TOPIC	SUMMARY OF COMMENTS
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⁶ See ISA 570 (Revised 2024), *Going Concern*, effective for audits of financial statements for periods beginning on or after December 15, 2026 and AU-C 570, *The Auditor’s Consideration of an Entity’s Ability to Continue as a Going Concern*, effective for audits of financial statements for periods ending on or after December 15, 2017. See also the AICPA’s Auditing Standards Board current standard-setting project on going concern, the objective of which is to assess and potentially make targeted amendments to AU-C 570: <https://www.aicpa-cima.com/resources/landing/asb-project-going-concern>.

Use of Artificial Intelligence	Commenters suggested that application guidance is needed on AI-related audit matters. Specific application areas to address suggested by commenters include data integrity/reliability, model validation, documentation, audit evidence, supervision and review, risk assessment, and tool governance. Some commenters expressed support for standard setting in the longer term.
Digital Assets	Commenters suggested that guidance is needed on applying certain existing standards to audits of entities that hold or issue digital assets. Commenters suggested specific issues to be addressed in the guidance including access, ownership, control, existence, and custody arrangements with third parties.
Accumulating Identified Misstatements	Commenters suggested that guidance is needed to address the application of “clearly trivial” to accounts and disclosures when accumulating identified misstatements under AS 2810, <i>Evaluating Audit Results</i> .

Other Topics

Other topics discussed by commenters in the context of standard setting include materiality, use of service organizations, substantive analytical procedures, inventory, use of internal auditors, use of specialists, auditing internal controls, auditing estimates, use of confirmation, audit evidence and audit documentation, group audit related matters, related parties, the auditor’s report, attestation standards, the structure and governance of accounting firms excluding auditor independence considerations, and Form AP. The suggestions made by commenters varied based on the topic and included amending existing standards, issuing guidance, and performing post-implementation reviews.

These topics were not added to the standard-setting or research agendas at this time. In developing the agendas, the PCAOB considers a range of factors, including the strategic plan, current and emerging audit issues, the results of PCAOB oversight activities, stakeholder feedback, developments at the SEC and other standard setters, and the resources available to advance each project. Applying those considerations, the projects added to the agendas were those where the staff identified the greatest need for regulatory action, research or other activities to meaningfully improve audit quality and investor protection. The staff will continue to monitor the other topics for potential future standard setting, research, or guidance.