

Texas Society of CPAs

Annual Report on Oversight

Date Issued – December 5, 2016

Administering Entity Oversight Process and Procedures

Introduction

Purpose of this Report

The purpose of this Annual Report on Oversight (Report) is to provide a general overview of the Peer Review Programs administered by the Texas Society of CPAs (Society), past and current statistics and the results of various oversight procedures performed by the TSCPA Peer Review Committee.

Years Presented in this Report

Information presented in this report is presented on a calendar year basis and includes oversight procedures performed in 2013, 2014 and 2015. Some procedures performed in those years may not have been completed until the subsequent calendar year.

Overview of TSCPA Peer Review

The Texas Society of CPAs (TSCPA) serves as the administering entity for the AICPA Peer Review Program in the State of Texas, which began in 1989, and the Texas Society of CPAs Peer Review Program since 1991. Both programs have adopted the AICPA “*Standards for Performing and Reporting on Peer Reviews*” as its minimum standards for review and operates similarly.

The Texas State Board of Accountancy (BOA) requires all firms in the state that provide attestation or compilation services as part of their public accounting process to be enrolled in a practice monitoring program. The BOA has designated TSCPA as an approved sponsoring organization to approve peer review reports issued for firms enrolled in peer review programs administered by TSCPA. See Exhibit A for a summary of enrolled firms by number of professionals.

AICPA bylaws require that members engaged in the practice of public accounting be associated with a firm that is enrolled in an approved practice-monitoring program if the services performed by such firm are within the scope of the AICPA’s practice monitoring standards, and the firm prepares reports in accordance with AICPA professional standards. For purposes of peer review under the AICPA program, an accounting and auditing practice is “all engagements performed under Statements on Auditing Standards (SASs); Statements on Standards for Accounting and Review Services (SSARs); Statements on Standards for Attestation Engagements (SSAEs); *Government Auditing Standards* (the Yellow Book) issued by the U.S. Government Accountability Office (GAO); and engagements performed pursuant to the standards of the Public Company Accounting Oversight Board (PCAOB). Engagements covered in the scope of the program are those included in the firm’s accounting and auditing practice that are not subject to PCAOB permanent inspection.”

Firms enrolled in either program are required to have a peer review every three years, the scope of which covers a one-year period. The review is conducted by an independent evaluator known as a peer reviewer and is not considered final until accepted by a committee of their peers, also known as report acceptance bodies (RABs). RABs must consist of at least three qualified individuals who are independent of the reviewed firm and the peer reviewer. In certain circumstances, reviewed firms are asked by the RAB to voluntarily complete one or more follow-up actions as a condition of acceptance by the RAB. See Exhibit E for a summary of required follow-up actions.

The following summarizes the different peer review types, objectives, and reporting requirements as defined under the AICPA *Standards*:

System Reviews: System reviews are for firms that perform engagements under the SASs or *Government Auditing Standards*, examinations under the SSAEs, or audits of non-SEC issuers performed pursuant to the standards of the PCAOB, in addition to reviews, compilations, or other attestation engagements. The peer reviewer's objective is to determine whether the system of quality control for performing and reporting on auditing and accounting engagements is designed to ensure conformity with professional standards and whether the firm is complying with its system appropriately. The peer review report rating may be *Pass* (firm's system of quality control is adequately designed and the firm has complied with its system of quality control); *Pass with deficiencies* (firm has less than reasonable assurance of conformity with professional standards in one or more areas); or *Fail* (firm's system of quality control is not adequately designed or complied with and there is little or no assurance of conforming with professional standards).

Engagement Reviews: Engagement reviews are for firms that only perform services under SSARS or services under the SSAEs not included in System Reviews. Engagement reviews focus on work performed and reports and financial statements issued on particular engagements (reviews, compilations, or agreed-upon procedures). The peer review report may be a rating of *Pass* (nothing came to the reviewer's attention that caused him or her to believe the engagements submitted for review were not performed and/or reported on in conformity with applicable professional standards in all material respects); *Pass with deficiencies* (nothing came to the reviewer's attention that caused him or her to believe the engagements submitted for review were not performed and/or reported on in conformity with applicable professional standards in all material respects except for the deficiencies described in the report); or *Fail* (reviewer concludes that, as a result of the deficiencies described in the report, the engagements submitted for review were not performed and/or reported on in conformity with applicable professional standards in all material respects). A report with a peer review rating of *Fail* is issued when deficiencies are evident on all of the engagements submitted for review.

See Exhibit B for a summary of results by type of peer review and report issued; Exhibit C for a summary of report modifications; Exhibit D for a summary of engagements not performed and/or reported on in conformity with professional standards in all material respects.

Oversight of Peer Reviews and Reviewers

Reviewer Evaluation Committee

The TSCPA Peer Review Committee (Committee) has established a Reviewer Evaluation Committee (REC) that is responsible for reporting to the full Committee on the activities of the oversight program regarding peer reviewers. The subcommittee is made up of the Committee Chair, Vice Chair, and other committee members as deemed necessary. REC members meet during the year to review the oversights conducted, reviewer resume verifications, consider reviewer performance and consult with staff on the status of reviews. Guidance from the AICPA Peer Review Program Oversight Handbook is followed.

Oversight Selection

Annually, the Society will perform random and targeted oversights on reviews and reviewers. The selections are based on the criterion for selection as outlined in the AICPA Peer Review Program Oversight Handbook, Chapter 2. At least 2% of all reviews performed in a calendar year are subject to oversight and will include at least two system and two engagement reviews. At a minimum, 2 system review oversights will be performed on-site.

Oversights are performed by either the program's technical reviewers, a member of the Peer Review Committee, or other qualified peer reviewers. A Peer Review Committee member or designee will perform all system reviews and must-select engagement oversights. This committee member must meet

team captain requirements and experience. Ordinarily, selection of the oversight reviewer is on a volunteer basis but may be assigned by the Committee Chairman, if there are no volunteers.

At least two “must select” engagements review oversights must be performed by a committee member or designee and may be performed on-site or off-site. The two engagement oversights must include either audits of employee benefits plans under the Employee Retirement Income Security Act (ERISA), engagements under the *Government Auditing Standards*, audits of insured depository institutions subject to the Federal Deposit Insurance Corporation (FDIC) Improvement Act of 1991, audits of carrying broker dealers, or examinations of service organization ([SOC] 1 and 2 engagements). Also, the two oversights selected should not be of the same type of audit.

Firms

All firms are subject to oversight and are selected based on a number of factors including but not limited to the types of peer review reports the firm has previously received, whether it is the firm’s first system review (after previously having an engagement review), and whether the firm conducts engagements in high risk industries.

Reviewers

All peer reviewers are subject to oversight and they may be selected based on a number of factors, including random selection, a notable and suspiciously too frequent submission of pass reports, conducting a significant number of reviews for firms with audits in high rise industries, performance of their first peer review, or performing high volumes of reviews. Oversight of a reviewer can also occur due to performance deficiencies or a history of performance deficiencies, such as issuance of an inappropriate peer review report, improperly considering matters that turn out to be significant, or failure to select an appropriate number of engagements.

Oversight Process

Oversights may be performed at the reviewed firm’s office or at other locations. Unless required by the committee there is no cost to the firm or reviewer for the oversight. Committee members or designees performing oversight are reimbursed for their time plus all direct travel and out-of-pocket expenses. Prior approval of the reviewer is obtained if he/she is required to pay for the oversight. Committee members are required to document the results of the oversight by completing an AICPA Oversight Checklist and preparing a report for the committee. Oversight reports are kept on file at the TSCPA office for AICPA oversight visits. Reports are not sent to the AICPA unless remedial action must be ratified by the AICPA. The final report is prepared on the committee member’s firm letterhead and submitted to the TSCPA REC. The reviewer may respond to the REC on the results of the oversight within 14 days of the date of the final report. See Exhibit F for a summary of oversights performed.

In situations where a reviewer has been allowed to conduct reviews only when there is a committee member present the reviewer may be required to reimburse the Society for the committee member’s expenses as noted above.

During each REC meeting the oversight reports will be considered and if necessary, additional oversight procedures may be imposed on the reviewer. Additionally, in some circumstances the committee may be asked to consider acceptance of the review.

Administrative Oversight

In years when there is no on-site Oversight Task Force (OTF) oversight, an administrative oversight is performed on the TSCPA administration of the peer review program by a member of the TSCPA Peer Review Committee or a designee pre-approved by the OTF. Procedures will cover the administrative requirements of the AICPA PRP. The administrative oversight reports are submitted to the AICPA as part of the Plan of Administration and are reviewed by the TSCPA Peer Review Committee, and before an on-site oversight, by an OTF member.

Verification of Reviewers' Resumes

To qualify as a reviewer, an individual must be an AICPA member and have at least five years of recent experience in the practice of public accounting in the accounting or auditing functions. The firm that the member is associated with should have received a pass report on either its system or engagement review. The reviewer should obtain at least 48 hours of continuing professional education in subjects related to accounting, auditing and quality control standards every three years, with a minimum of 8 hours in any one year. A reviewer of an engagement in a high-risk industry should possess not only current knowledge of professional standards but also current knowledge of the accounting practice specific to that industry. In addition, the reviewer of an engagement in a high-risk industry should have current practice experience in that industry. If a reviewer does not have such experience, the reviewer may be called upon to justify why he or she should be permitted to review engagements in that industry. The TSCPA Peer Review Committee has the authority to decide whether a reviewer's or review team's experience is sufficient to perform a particular review.

Ensuring that reviewers' resumes are updated annually and accurate is a critical element in determining if the reviewer or review team has the appropriate knowledge and experience to perform a specific peer review. In accordance with the AICPA Oversight Handbook, TSCPA must verify information within a sample of reviewers' resume on annual basis. See Exhibit G for a list of reviewer resumes verified in 2015. All reviewer resumes are verified over a three-year period.

Verification procedures include:

- The reviewer providing specific information such as the number of engagements they are specifically involved with and in what capacity. TSCPA staff then compares the information provided by the reviewer to the reviewer's resume on file in the AICPA system and to the reviewer firm's most recent background information to determine if those engagements were included in the firm's last peer review.
- Determining the reviewers' qualifications and experience related to engagements performed under GAGAS, audits of employee benefit plans under ERISA, audits of insured depository institutions subject to FDICIA, audits of carrying broker dealers, and examinations of service organizations (Service Organization Control [SOC] 1 and 2 engagements) .
- If the reviewer has a license to practice as a certified public accountant in the state of Texas. (This may include requesting copies of their license.)
- A list of continuing professional education (CPE) courses taken over a three-year period, to document the required 120 hours of CPE over 3 years and 48 CPE hours related to accounting and auditing to be obtained every three years with at least 8 hours in one year, including CPE from a qualified reviewer training courses; and qualifications to perform Yellow Book audit, if applicable. Reviewers may also be required to provide CPE certificates.
- Determining whether the reviewer is a partner or manager in a firm enrolled in a practice monitoring program.
- Verifying that the reviewer's firm received a pass report on its most recently completed peer review.
- If the reviewer has received communications relating to allegations/investigations or notifications relating to limitations/restrictions the administering entity should verify that such has been documented and AICPA staff has been informed of.

Exhibit A**Number of Enrolled Firms by Number of Professionals* as of October 31, 2016.**

	TSCPA Peer Review Program	^AICPA Peer Review Program
Sole Practitioners	504	545
2 to 5	434	901
6 - 10	78	367
11 - 19	14	156
20-49	1	64
50-99	0	10
100+	0	4
Total Enrolled Firms	1031	2047

* Professionals are considered all personnel who perform professional services, for which the firm is responsible, whether or not they are CPAs. The number of enrolled firms is as of October 31, 2016.

^At least one partner of the firm must be a member of the AICPA to enroll in the AICPA Peer Review Program

Exhibit B

Results of Peer Reviews Performed from 2013-2015

Results by Type of Peer Review and Report Issued

	2013		2014		2015	
	TSCPA Peer Review Program	AICPA Peer Review Program	TSCPA Peer Review Program	AICPA Peer Review Program	TSCPA Peer Review Program	AICPA Peer Review Program
System Reviews:						
Pass	24	208	28	244	31	192
Pass with deficiency(ies)	11	28	5	35	9	27
Fail	9	11	6	19	11	15
Subtotal – System	44	247	39	298	51	234
Engagement Reviews:						
Pass	223	369	256	426	267	418
Pass with deficiency(ies)	74	97	68	61	26	43
Fail	46	40	37	27	31	21
Subtotal - Engagement	343	506	361	514	324	482
Totals	387	753	400	812	375	716

Note: The above data reflects peer review results as of October 31, 2016. Approximately 1.60% of 2015 reviews are in process and their results are not included in the totals above.

Exhibit C

Number and Reasons for Report Modifications

The following lists the reasons, summarized by elements of quality control as defined by Statement on Quality Control Standards No. 10, for report modifications (when a pass with deficiencies or fail report is issued) from system reviews performed from 2013-2015. It is important to note that one review may have more than one reason for a report modification.

	2013		2014		2015	
	TSCPA Peer Review Program	AICPA Peer Review Program	TSCPA Peer Review Program	AICPA Peer Review Program	TSCPA Peer Review Program	AICPA Peer Review Program
Reasons for Report Modifications						
Leadership responsibilities for quality with the firm (“the tone at the top”)	4	5	4	11	3	4
Relevant Ethical Requirements	1	1	1	3	0	0
Acceptance and Continuance of Client Relationships and specific engagements	0	2	2	6	1	1
Human Resources	2	5	2	15	4	10
Engagement Performance	5	15	11	43	17	29
Monitoring	2	6	6	21	13	18
Totals	14	34	26	99	38	62

Note: The above data reflects peer review results as of October 31, 2016. Approximately 1.60% of 2015 reviews are in process and their results are not included in the totals above.

Exhibit D**Number of Engagements Not Performed or Reported On in Accordance with Professional Standards in All Material Respects**

The following shows the total number of engagements reviewed and the number identified as “not performed or reported on in accordance with professional standards in all material respects” from peer reviews performed during 2013-2015. The Standards state that an engagement is ordinarily considered not performed and/or reported in accordance with applicable professional standards when deficiencies, individually or in aggregate, exist that are material to understanding the report or the financial statements accompanying the report, or represents omission of a critical accounting, auditing, or attestation procedure required by professional standards.

Exhibit D (continued)

2015				
Engagement Type	TSCPA Peer Review Program		AICPA Peer Review Program	
	Number of Engagements		Number of Engagements	
	Reviewed	Not Performed in Accordance with Professional Standards	Reviewed	Not Performed in Accordance with Professional Standards
Audits:				
Single Audit Act (A-133)	8	2	99	19
Governmental – All Other	6	2	80	11
ERISA	7	1	115	30
FDICIA	0	0	4	1
Other	54	17	261	21
Reviews	65	7	267	21
Compilations:				
with Disclosures	35	2	168	13
without Disclosures	490	61	1195	67
Forecast & Projections	1	0	8	1
SOC 1 Reports	0	0	3	0
Agreed Upon Procedures	6	1	77	2
Other SSAEs	1	0	1	0
Preparation Services	7	0	14	2
Totals	680	93	2292	188
% of Totals		14%		8%

Note: The above data reflects peer review results as of October 31, 2016. Approximately 1.60% of 2015 reviews are in process and their results are not included in the totals above.

Exhibit D (continued)

2014				
Engagement Type	TSCPA Peer Review Program		AICPA Peer Review Program	
	Number of Engagements		Number of Engagements	
	Reviewed	Not Performed in Accordance with Professional Standards	Reviewed	Not Performed in Accordance with Professional Standards
Audits:				
Single Audit Act (A-133)	11	4	110	15
Governmental – All Other	12	4	90	15
ERISA	10	6	181	47
FDICIA	0	0	5	0
Other	33	7	339	27
Reviews	61	16	311	21
Compilations:				
with Disclosures	40	13	189	13
without Disclosures	646	159	1257	133
Forecast & Projections	1	0	5	1
SOC Reports	1	0	8	3
Agreed Upon Procedures	8	0	97	6
Other SSAEs	8	1	33	3
Totals	831	210	2625	284
% of Totals		25%		11%

Exhibit D (continued)

2013				
Engagement Type	TSCPA Peer Review Program		AICPA Peer Review Program	
	Number of Engagements		Number of Engagements	
	Reviewed	Not Performed in Accordance with Professional Standards	Reviewed	Not Performed in Accordance with Professional Standards
Audits:				
Single Audit Act (A-133)	15	9	108	16
Governmental – All Other	9	3	65	10
ERISA	3	1	134	6
FDICIA	0	0	7	0
Other	35	7	275	25
Reviews	56	11	264	26
Compilations:				
with Disclosures	29	10	175	26
without Disclosures	621	176	1111	206
Forecast & Projections	1	0	4	0
SOC Reports	0	0	5	0
Agreed Upon Procedures	3	1	71	4
Other SSAEs	1	0	4	0
Totals	773	218	2223	319
% OF Totals		28%		14%

Exhibit E**Summary of Required Follow-up Actions**

The TSCPA Peer Review Committee is authorized by the Standards to decide on the need for and nature of any additional follow-up actions required as a condition of acceptance of the firm's peer review. During the report acceptance process, the peer review committee evaluates the need for follow-up actions based on the nature, significance, pattern, and pervasiveness of engagement deficiencies. The peer review committee also considers the comments noted by the reviewer and the firm's response thereto. If the firm's response contains remedial actions which are comprehensive, genuine, and feasible, then the committee may decide to not recommend further follow-up actions. Follow-up actions are remedial and educational in nature and are imposed in an attempt to strengthen the performance of the firm. A review can have multiple follow-up actions. For 2013-2015, the following represents the type of follow-up actions required.

Type of Follow-up Action	2013		2014		2015	
	TSCPA Peer Review Program	AICPA Peer Review Program	TSCPA Peer Review Program	AICPA Peer Review Program	TSCPA Peer Review Program	AICPA Peer Review Program
Agree to take certain Continuing Prof. Education (CPE)	126	174	119	150	81	121
Agree to hire consultant for inspection	1	2	0	4	2	1
Agree to hire consultant for preissuance reviews	20	27	15	37	14	28
Submit proof of CPE taken	15	7	8	7	6	9
Submit copy of inspection report	0	0	0	0	0	3
Submit report on consultant	0	0	0	0	0	1
Submit quarterly progress reports	0	0	0	0	1	1
Submit to team captain (TC) revisit – general	2	3	2	8	6	15
Submit to TC review of sub engagement with workpapers	3	2	5	4	3	1
Agree to have accelerated review	1	1	0	0	0	0
Submit Inspection report to Team Captain	0	0	0	0	0	2
Team captain to review Quality Control Document	1	2	0	3	2	0
Review of Formal CPE plan by outsider	1	1	0	0	0	1
Outside Party to review inspection	0	3	1	5	0	0
Submit to TC review of sub engagement with workpapers	5	6	10	8	13	10
Submit inspection report to outside party	2	5	0	0	0	0
Team captain correction of substandard engagement	0	0	0	0	1	1
Outside party review substandard correction	0	1	1	1	0	2
Submit additional information regarding repeat findings	0	1	2	0	1	2
Submit monitoring report to Committee	0	0	2	0	0	0
Submit monitoring report to Team Captain	0	1	0	2	0	0
Oversight of monitoring by Team Captain	0	0	0	1	0	0
Submit proof of purchase of manuals	0	0	0	1	0	0
Submit evidence of proper firm licensure	2	2	1	0	1	0
Totals	179	238	166	231	131	198

Note: The above data reflects peer review results as of October 31, 2016. Approximately 1.60% of 2015 reviews are in process and their results are not included in the totals above.

Exhibit F

Oversight Results of Peer Reviews

	2013		2014		2015	
	AICPA Peer Review Program	TSCPA Peer Review Program	AICPA Peer Review Program	TSCPA Peer Review Program	AICPA Peer Review Program	TSCPA Peer Review Program
Type of Peer Review (Sys, Eng,)						
System	9	2	9	1	13	2
Engagement	14	8	14	12	11	10
Totals	23	10	23	13	24	12
Type of Oversight Review:						
On-Site	2	0	5	0	2	0
Off-Site	21	10	18	13	22	12
Totals	23	10	23	13	24	12
"Must Select" Engagement Oversight						
ERISA	5	0	7	0	10	0
GAGAS	3	2	4	0	3	1
FDICIA	0	0	0	0	1	0
SOC 1 Engagement	0	0	1	0	0	0
Totals	8	2	12	0	14	1

Exhibit G**Verification of Reviewer's Resumes During 2015**

Total Number of Peer Reviewers	Total Number of Resumes Verified for Year	% of Total Verified
133	56	30%

Administrative Oversight

Date of Last Administrative Oversight Performed by the Administering Entity	October 5, 2016
Date of Last On-site Oversight Performed by the AICPA Oversight Task Force (covers only the AICPA Peer Review Program)	December 3-4, 2015