

ITEM 7 - UPDATE

STATE OF OKLAHOMA OKLAHOMA ACCOUNTANCY BOARD PEER REVIEW OVERSIGHT COMMITTEE

Peer Review Oversight Committee Annual Report for Calendar Year 2012

3/21/2013

Pursuant to the Oklahoma Accountancy Act (The Act), §15.30, the Oklahoma Accountancy Board (OAB) establishes a peer review program to monitor firms' compliance with applicable accounting and auditing standards adopted by generally recognized standard setting bodies, the program emphasizes education, including appropriate remedial procedures, which may be recommended or required when financial statement reports do not comply with professional standards. In the event a firm does not comply with established professional standards, or a firm's professional work is so inadequate as to warrant disciplinary actions, the OAB shall take appropriate action to protect the public interest.

The OAB, pursuant to Title 10 of the Oklahoma Administrative Code; Subchapter 33; Section 10:15-33-3 adopts the "Standards for Performing and Reporting on Peer Reviews," as promulgated by the American Institute of Certified Public Accountants (AICPA) or other standards approved by the OAB as its minimum standards for peer review of registrants.

Oversight of the minimum standards for peer review of registrants is established through the OAB's Peer Review Oversight Committee (PROC) which is provided for in 10:15-33-7 of the Oklahoma Administrative Code.

The purpose of the PROC is to monitor Sponsoring Organizations and provide the OAB with a reasonable assurance that peer reviews are being conducted and reported on in accordance with the OAB's minimum standards for peer review, review the policies and procedures of sponsoring organization applicants as to their conformity with the peer review minimum standards, and report to the OAB on the conclusions and recommendations reached as a result of performing the aforementioned functions.

Ratified March 21, 2013, the PROC operating statement is:

"To evaluate and monitor the Peer Review Program established by the Oklahoma Accountancy Board to provide reasonable assurance that the American Institute of Certified Public Accountant's Peer Review Program Standards are being properly administered in the State of Oklahoma making referrals to the Oklahoma Accountancy Board as needed for further action."

Oversight procedures have been established to ensure that the peer reviews being administered to OAB registrants are being conducted and reported in accordance with peer review minimum standards (PROC Operating Summary attached). The procedures include:

A. At least one PROC member is scheduled to attend in person, all Oklahoma Society of Certified Public Accountant's (OSCPA) Peer Review Committee meetings to consider the acceptance bodies' deliberations in accepting peer reviews;

[UPDATE] – Oversight procedure A was ratified for fiscal year 2014. In the event no PROC member is able to attend an OSCPA Peer Review Committee meeting, the OAB Executive Director or Deputy Director is to attend in their place.

B. On an annual basis, the PROC reviews the qualifications of each entity approved by the OAB to administer peer reviews;

[UPDATE] – Oversight procedure B was ratified for fiscal year 2014. In lieu of reviewing a state society's AICPA oversight report, the PROC will rely on NASBA Compliance Assurance Committee approved Peer Review Oversight Committees as oversight to ensure peer reviews are being performed in accordance with AICPA Minimum Standards.

- C. A detailed review of all Pass with Deficiency and Fail peer review reports are performed by the PROC. When necessary, prescribe actions designed to assure correction of the deficiencies in the reviewed firm's system of quality control;
- D. Monitor remedial and corrective actions as prescribed by the PROC and/or the administering entity to determine compliance by the firm;
- E. Accept all pass system and engagement peer review reports submitted to the OAB; and
- F. As deemed appropriate, refer firms to the OAB's Enforcement Committee for failing to comply with the OAB's peer review program or performing work that is so inadequate as to warrant disciplinary action.

[UPDATE] — Oversight procedure F was ratified for fiscal year 2014. In the future, firms receiving consecutive Pass with Deficiencies or Fail peer review reports will have its peer review history referred to the Enforcement Committee for additional scrutiny.

Based on the aforementioned procedures, the following is a summary of the PROC activity during calendar year 2012.

At least one PROC member attended the following OSCPA Peer Review Committee meetings during calendar year 2012:

Thursday, February 9, 2012 Thursday, October 18, 2012 Thursday, December 13, 2012

As of June 1, 2013 (as of 12/31/2012 data not available), there were 133 Sole Proprietorships and 501 registered firms which have reported to the OAB the performance of engagements requiring peer.

The PROC made four referrals to the Enforcement Committee in calendar year 2012.

The PROC has concluded that for calendar year 2012:

- 1. Technical reviews are being performed and reviewed in a timely manner by the OSCPA;
- 2. Technical reviewers appear knowledgeable about their function;
- 3. Technical reviewers resolve inconsistencies and disagreements before accepting reports;
- 4. Technical reviewers make the OSCPA Peer Review Committee aware of matters needed to properly evaluate the review.
- 5. The technical reviewers are available during the meetings to answer questions; and
- 6. During its oversight of the OSCPA Report Acceptance Bodies (RAB), the PROC specifically noted the various RABs consistently held open and thorough discussions of reviews. While attending 2012 meetings, the PROC also observed the RABs address every issue with purpose and in a thoughtful and meaningful discussion. Finally, the PROC concludes the vast knowledge collectively shared by RAB members regarding acceptance procedures and corrective or monitoring actions to be excellent.

At December 31, 2012, the following entities' are approved as sponsoring organizations:

- AICPA Center For Public Company Audit Firms
- Alabama Society of Certified Public Accountants
- Arkansas Society of Certified Public Accountants
- California Society of Certified Public Accountants
- Colorado Society of Certified Public Accountants
- Florida Institute of Certified Public Accountants
- Georgia Society of Certified Public Accountants
- Illinois Society of Certified Public Accountants
- Indiana Certified Public Accountant Society
- Iowa Society of Certified Public Accountants
- Kansas Society of Certified Public Accountants
- Michigan Society of Certified Public Accountants
- Minnesota Society of Certified Public Accountants
- Mississippi Society of Certified Public Accountants
- · Missouri Society of Certified Public Accountants
- Montana Society of Certified Public Accountants
- National Peer Review Committee
- Nevada Society of Certified Public Accountants
- New York State Society of Certified Public Accountants
- Oklahoma Society of Certified Public Accountants
- Pennsylvania Society of Certified Public Accountants
- · Society of Louisiana Certified Public Accountants
- Tennessee Society of Certified Public Accountants
- Texas Society of Certified Public Accountants;

Nothing came to the PROC's attention that would lead them to believe that, these administering entities were not administering peer reviews in accordance with "Standards for Performing and Reporting on Peer Reviews," as promulgated by the AICPA.

Finally, the PROC concludes that peer reviews administered by the OSCPA are being performed for Oklahoma registrants in accordance with the "Standards for Performing and Reporting on Peer Reviews," as promulgated by the AICPA.

Oklahoma Accountancy Board Peer Review Oversight Committee

Williamson, CPA, PROC Chair

Thomas C. McGuire
Thomas C. McGuire. CPA

Mike Gibson CDA

SYSTEM	FY 10 Q1	FY 10 Q2	FY 10 Q3	FY 10 Q4	Total	FY 11 Q1	FY 11 Q2 and FY12 Q3	FY 11 Q4 and FY12 Q1	Total	FY 12 Q2	FY 12 Q3	FY 12 Q4	Total	FY 13 Q1	FY 13 Q2	FY 13 Q3	FY 13 Q4	Total
Unmodified	2	0	0	0	2	0	0	22	22	0	0	0	0	0	0			0
Pass	34	59	43	39	175	20	109	111	240	27	12	69	108	52	0			52
Unmodified With Comments	1	0	0	0	1	0	0		(0	0	0	0	0	0			0
Unmodified With Follow Up	0	2	1	0	3	0	0		(0	0	0	0	0	0			0
Modified	1	3	0	0	4	0	0		(0	0	0	0	0	0			0
Pass With Deficiencies	0	3	4	17	24	5	7	11	23	4	0	9	13	5	8			13
Adverse	0	3	0	0	3	0	0	1	1	0	0	0	0	0	0			0
Fail	0	2	1	1	4	0	3	1	4	1	2	1	4	1	2			3
SYSTEM TOTALS	38	72	49	57	216	25	119	146	290	32	14	79	125	58	10	0	0	68

Total	
24	
575	
1	
3	
4	
73	
4	
15	
699	

ENGAGEMENTS	FY 10 Q1	FY 10 Q2	FY 10 Q3	FY 10 Q4	Total	FY 11 Q1	FY 11 Q2 and FY12 Q3	FY 11 Q4 FY12 q1	Total	FY 12 Q2	FY 12 Q3	FY 12 Q4	Total	FY 13 Q1	FY 13 Q2	FY 13 Q3	FY 13 Q4	Total
Unmodified	0	0	0	0	0	0	0	4	4	0	0	0	0	0	0			0
Pass	8	9	7	15	39	7	19	32	58	9	4	0	13	0	0			0
Unmodified With Comments	0	0	0	0	0	0	0		0	0	0	0	0	0	0			0
Unmodified With Follow Up	0	0	0	0	0	0	0		0	0	0	0	0	0	0			0
Modified	0	0	0	0	0	0	0		0	0	0	0	0	0	0			0
Pass With Deficiencies	1	1	0	0	2	2	0	2	4	1	1	0	2	0	0			0
Adverse	0	0	0	0	0	0	0		0	0	0	0	0	0	0			0
Fail	0	0	0	0	0	0	0		0	1	0		1	0	0			0
ENGAGEMENT TOTALS	9	10	7	15	41	9	19	38	66	11	5	0	16	0	0	0	0	0

Total
4
110
0
0
0
8
0
1
123

Oklahoma Accountancy Board

BOARD OVERSIGHT COMMITTEE

Summary of Oversight Visit - Peer Review Committee

Oversight Committee Member Performing This Review			_
Date Performed			_
RAB #			
Attend the program's Peer Review Committee meeting otherwise attempt to influence the report acceptance	~	Do not advise or	
1. Are technical reviews being performed within a reas documents are submitted to the Peer Review Program		od after review	
	Yes	No	_
2. Do technical reviewers appear knowledgeable abou	t their function?		
2. Bo teenmen reviewers appear informedgeaste about	Yes	No	_
3. Do the technical reviewers attempt to resolve inconrecommending the reviews for acceptance to the RAB		sagreements before	
Teconimical and the technique of the technique to the technique	Yes	No	_
4. Do the technical reviewers make the RABs aware o the review?	f matters needed	to properly evaluate	
	Yes	No	<u>_</u>
5. Is the technical reviewer available during the meeting	ng to answer gues	etions that arise?	
3. Is the technical reviewer available during the meeting	Yes		_
6. Are the technical reviewers knowledgeable about th	e treatment of:		_
Engagements not performed and reported on	Yes	No	N/A
Monitoring issues?	Yes	No	N/A
Governmental issues?	Yes	No	N/A
Review scope?	Yes	No	N/A
Appropriate format for report and letter of			
response, if applicable?	Yes	No	N/A
Revisions to review documents?	Yes	No	N/A
Corrective or monitoring actions?	Yes	No	N/A

Summary of Oversight Visit - Peer Review Committee

Date			
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7. Were any specific solutions to problems discussed?			
, , , , , , , , , , , , , , , , , , ,	Yes	No	-
8. Do technical reviewers believe sufficient guidance is	s provided by the	eir program?	_
O	Yes	No	_
9. Have the technical reviewers demonstrated improve report?	ement from any I	orior oversight visit	_
T	Yes	No	_
10. Were the following manuals available during the m	neeting:		
Peer Review Program Manual?	Yes	No	
Peer Review Administrative Manual?	Yes	No	_
RAB Handbook?	Yes	No	-
11. Is the RAB meeting comprised of at least three me	embers?		
	Yes	No	_
12. Does the extent of the RAB's review appear appro	priate?		
	Yes	No	_
40 W. d	1'		
13. Were the appropriate decisions made by the RAB i	regarding:		
Engagements not performed and reported on	Yes	No	N/A
Monitoring issues?	Yes	No	N/A
Governmental issues?	Yes	No	N/A
Review scope?	Yes	No	N/A
Revisions to review documents?	Yes	No	N/A
The issuance of team captain feedback forms?	Yes	No	N/A
Requests for extensions?	Yes	No	N/A
Handling problem reviews?	Yes	No	N/A
Corrective or monitoring actions?	Yes	No	N/A

Summary of Oversight Visit - Peer Review Committee

Date			
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14. Were any specific solutions to problems discuss	ed? Yes	No	<u>-</u>
15. Has the RAB agreed to take any action on probl	lems? Yes	No	-
16. Do the RAB members believe sufficient guidance	ce is provided by th		_
17. Does the RAB consider technical reviewers' recodecision?	ommendations and		
18. Has the RABdemonstrated improvement from a		visit report?	
19. Please rate the RAB's knowledge of acceptance actions? Poor Adequate; needs some improvement Excellent	-	rrective/monitoring	
20. List any items discussed with the OSCPA Peer l	Review Chairperson	n.	
			-
			_
			=
			=

Date	
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21. List the number	of each type of peer review presented:
	Pass System Reports
	Pass Engagement Reports
	Pass with Deficiencies System Reports
	Pass with Deficiencies Engagement Reports
	Fail System Reports
	Fail Engagement Reports