



**STATE OF OKLAHOMA
OKLAHOMA ACCOUNTANCY BOARD
PEER REVIEW OVERSIGHT COMMITTEE**

Peer Review Oversight Committee Annual Report for Calendar Year 2014

3/31/2015

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.

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. In the event no PROC member is able to attend an OSCPAs 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. The PROC shall first seek to rely on the NASBA Compliance Assurance Committee's list of approved Peer Review Oversight Committees as oversight to ensure peer reviews are being performed in accordance with AICPA Minimum Standards. In the event this list is not available for the PROC to review, it will then seek to rely on the administering entity's AICPA Oversight Report;
- 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.
 - Firms receiving consecutive Fail peer review reports shall have its peer review history automatically referred to the Enforcement Committee for additional scrutiny.
 - As deemed appropriate by the PROC, firms receiving consecutive Pass with Deficiency reports may have its peer review history referred to the Enforcement Committee for additional scrutiny.
 - As deemed appropriate by the PROC, firms receiving a Pass with Deficiency report then Fail report may have its peer review history referred to the Enforcement Committee for additional scrutiny.
 - As deemed appropriate by the PROC, firms receiving a Fail report then a Pass with Deficiency report may 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 2014.

At least one PROC member attended the following OSCP A Peer Review Committee meetings during calendar year 2014:

Thursday, February 6, 2014 - Vaughn
Thursday, August 14, 2014 - Vaughn
Thursday, October 16, 2014 - Williamson
Thursday, December 11, 2014 - Gibson

As of December 31, 2014, there were 99 Sole Proprietorships and 428 registered firms which have reported to the OAB the performance of engagements requiring peer.

There were 15 peer review referrals to the Enforcement Committee in calendar year 2014.

The PROC has concluded that for calendar year 2014:

1. Technical reviews are being performed and reviewed in a timely manner by the OSCP A;
2. Technical reviewers appear knowledgeable about their function;
3. Technical reviewers resolve inconsistencies and disagreements before accepting reports;
4. Technical reviewers make the OSCP A 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 OSCP Report Acceptance Bodies (RAB), the PROC specifically noted the various RABs consistently held open and thorough discussions of reviews. While attending 2014 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.

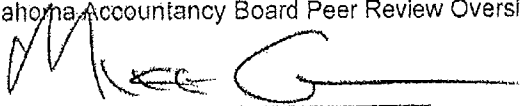
At December 31, 2014, the following entities' are approved as sponsoring organizations:

- 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 England Society of Certified Public Accountants
- New York State Society of Certified Public Accountants
- Ohio Society of Certified Public Accountants
- Oklahoma Society of Certified Public Accountants
- Oregon 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
- Washington Society of Certified Public Accountants

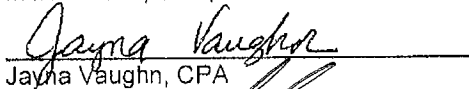
Nothing came to the PROC's attention that would lead them to believe that, these administering entities were not administering peer reviews in accordance with "*Standards for Performing and Reporting on Peer Reviews*," as promulgated by the AICPA.

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

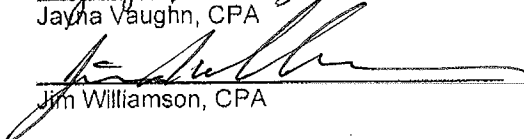
Oklahoma Accountancy Board Peer Review Oversight Committee



Mike Gibson, CPA, PROC Chair



Jayna Vaughn, CPA



Jim Williamson, CPA

2014 PROC ANNUAL REPORT
REPORTS REVIEWED BY YEAR

SYSTEM PEER REVIEWS	2010 TOTALS	2011 TOTALS	2012 TOTALS	2013 TOTALS	MAR-14	JUN-14	OCT-14	NOV-14	2014 TOTAL
PASS	175	240	108	161	47	13	19	8	87
PASS WITH DEFICIENCIES	24	23	13	16	6	1	3	0	10
FAIL	4	4	4	2	1	0	0	1	2
SYSTEM TOTALS	203	267	125	179	54	14	22	9	99

ENGAGEMENT PEER REVIEWS	2010 TOTALS	2011 TOTALS	2012 TOTALS	2013 TOTALS	MAR-14	JUN-14	OCT-14	NOV-14	2014 TOTAL
PASS	39	58	13	29	5	0	8	5	18
PASS WITH DEFICIENCIES	2	4	2	10	0	0	1	0	1
FAIL	0	0	1	2	1	0	0	0	1
ENGAGEMENT TOTALS	41	62	16	41	6	0	9	5	20

**Oklahoma Accountancy Board
Peer Review Oversight Committee (PROC)**

OPERATING SUMMARY

Purpose

To evaluate and monitor the peer review program established by the Board to provide reasonable assurance that the AICPA Peer Review Program standards are being properly administered in the state of Oklahoma making referrals to the Board for further action as needed. (10:15-33-7)

Objectives and Procedures

Ensure that peer reviews are conducted in accordance with AICPA Standards for Performing and Reporting on Peer Reviews. (10:15-33-7e3)

- Review applications from entities requesting approval as a sponsoring organization (10:15-33-7a2)
- Annually obtain and review the list of NASBA Compliance and Assurance Committee approved Peer Review Oversight Committees, or if not available, the most recent sponsoring organization AICPA oversight report (10:15-33-7a1)
- At least one member of the PROC will attend each OSCP Peer Review Committee meeting (10:15-33-7e3). OAB staff may attend if a PROC member is not available
- At least one member of the PROC will attend the AICPA Oversight visit exit conference for the OSCP (10:15-33-7e3). The PROC shall use its discretion when determining the need to be present for more of the oversight process beyond attending the oversight exit conference. (Peer Review Committee Directive)
- Annually recommend sponsoring organizations to the Board for approval (10:15-33-7d)

Ensure firms undergo peer reviews as required and recommend appropriate remedial actions if necessary. (10:15-33-4 and 10:15-33-7e2)

- Ensure firms submit required reports (10:15-33-6)
- Accept all Pass reports submitted to the Board without review by PROC (10:15-33-7e4)
- Review and discuss all Pass with Deficiencies and Fail reports (10:15-33-7e4)
- Assess remedial action prescribed by the sponsoring organization for appropriateness and prescribe additional remedial action if deemed necessary (10:15-33-7e1)
- Monitor firm compliance with prescribed remedial action (10:15-33-7e2)
- Firms may be referred to the Enforcement Committee based on the judgement of the PROC: (10:15-37-1a)
- Firms not submitting required reports (10:15-33-6)
- Firms requiring continued oversight following deficient reports as described in 10:15-33-5

- Firms with consecutive substandard reports may automatically be sent to the Enforcement Committee for further scrutiny unless the PROC determines the firm to have complied to the extent this action is not warranted (Peer Review Committee Directive):
 - o Firms receiving consecutive Fail peer review reports shall have its peer review history automatically referred to the Enforcement Committee for additional scrutiny.
 - o As deemed appropriate by the PROC, firms receiving consecutive Pass with Deficiency reports may have its peer review history referred to the Enforcement Committee for additional scrutiny.
 - o As deemed appropriate by the PROC, firms receiving a Pass with Deficiency report then Fail report may have its peer review history referred to the Enforcement Committee for additional scrutiny.
 - o As deemed appropriate by the PROC, firms receiving a Fail report then a Pass with Deficiency report may have its peer review history referred to the Enforcement Committee for additional scrutiny.
- Files referred to the Enforcement Committee by the PROC may include commentary and/or suggestions for potential corrective actions (Peer Review Committee Directive)
- Others as deemed appropriate by the PROC

Regularly communicate results of PROC operations. (10:15-33-7a3)

- PROC will meet and report activities to the Board at least quarterly (March, June, September, and November) (10:15-33-7e4)
- Annually report conclusions and recommendations regarding evaluation and monitoring of peer review program to Board during the April Board meeting (10:15-33-7a3)
- Communicate problems encountered to sponsoring organizations as needed (10:15-33-7e5)

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 as an observer. Do not advise or otherwise attempt to influence the report acceptance process.

1. Are technical reviews being performed within a reasonable time period after review documents are submitted to the Peer Review Program?

Yes _____ No _____

2. Do technical reviewers appear knowledgeable about their function?

Yes _____ No _____

3. Do the technical reviewers attempt to resolve inconsistencies and disagreements before recommending the reviews for acceptance to the RAB?

Yes _____ No _____

4. Do the technical reviewers make the RABs aware of matters needed to properly evaluate the review?

Yes _____ No _____

5. Is the technical reviewer available during the meeting to answer questions that arise?

Yes _____ No _____

6. Are the technical reviewers knowledgeable about the treatment of:

Engagements not performed and reported on in	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 provided by their program?

Yes _____ No _____

9. Have the technical reviewers demonstrated improvement from any prior oversight visit report?

Yes _____ No _____

10. Were the following manuals available during the meeting:

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 members?

Yes _____ No _____

12. Does the extent of the RAB's review appear appropriate?

Yes _____ No _____

13. Were the appropriate decisions made by the RAB regarding:

conformity with professional standards? 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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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