



January 28, 2019

Deborah Curry, CPA, CGMA, President/CEO  
Robert La Plant, CPA, Peer Review Committee Chair  
Florida Institute of CPAs  
3800 Esplanade Way  
Tallahassee, FL 32311

Dear Ms. Curry and Mr. La Plant:

On January 28, 2019, the AICPA Peer Review Board Oversight Task Force accepted the report and letter of procedures and observations on the most recent oversight visit for the Florida Institute of CPAs, the administering entity for the AICPA Peer Review Program, and the administering entity's response thereto. A copy of this acknowledgement, the two oversight visit documents, and your response have now been posted to the AICPA Peer Review Program website.

The next administering entity oversight visit will be in 2020.

The AICPA Peer Review Board appreciates your cooperation and efforts in making the peer review program a success.

Sincerely,

*Brian Bluhm*

Brian Bluhm, CPA  
Chair – Oversight Task Force  
AICPA Peer Review Board

cc: Paul Brown, Director of Technical Services  
Florida Institute of CPAs

Laurel Gron, CPA, Senior Manager – Peer Review  
AICPA Peer Review Program

## Oversight Visit Report

August 23, 2018

To the Florida Institute of Certified Public Accountants  
Peer Review Committee

We have reviewed Florida Institute of Certified Public Accountants' (the "Institute") administration of the AICPA Peer Review Program (program) as part of our oversight program. The Institute is responsible for administering the program in Florida. Our procedures were conducted in conformity with the guidance established by the AICPA Peer Review Board (board) as contained in the *AICPA Peer Review Program Oversight Handbook*.

**Administering Entity's Responsibility**

The administering entity is responsible for administering the AICPA Peer Review Program in compliance with the *AICPA Standards for Performing and Reporting on Peer Reviews*, interpretations, and other guidance established by the board.

**Oversight Task Force's Responsibility**

Our responsibility is to determine whether (1) administering entities are complying with the administrative procedures established by the board as set forth in the *AICPA Peer Review Program Administrative Manual*, (2) the reviews are being conducted and reported upon in accordance with the standards, (3) the results of the reviews are being evaluated on a consistent basis by all administering entity peer review committees, and (4) information disseminated by administering entities is accurate and timely.

**Conclusion**

Based on the results of the procedures performed, we have concluded that the Institute has complied with the administrative procedures and standards in all material respects as established by the board.

As is customary, we have issued a letter of oversight visit procedures and observations that details the oversight procedures performed and sets forth recommendations that were not considered to be of sufficient significance to affect the conclusions expressed in this report.



Thomas J. Parry, Member, Oversight Task Force  
AICPA Peer Review Program



August 23, 2018

To the Florida Institute of Certified Public Accountants  
Peer Review Committee

We have reviewed Florida Institute of Certified Public Accountants' (the "Institute") administration of the AICPA Peer Review Program as part of our oversight program and have issued our report thereon dated August 23, 2018. That report should be read in conjunction with the observations in this letter, which were considered in determining our conclusions. The observations described below were not considered to be of sufficient significance to affect the conclusions expressed in that report.

The oversight visit was conducted according to the procedures in the *AICPA Peer Review Program Oversight Handbook*. An oversight program is designed to improve the administering entity's administration of the AICPA Peer Review Program through feedback on its policies and procedures, and to provide resource assistance from an AICPA Peer Review Board Oversight Task Force member on both technical and administrative matters.

In conjunction with the oversight visit of the Institute, the administering entity for the program, conducted on August 22<sup>nd</sup> and 23<sup>rd</sup>, 2018, the following observations are being communicated.

#### **Administrative Procedures**

On the morning of August 22, 2018, Tricia Van Vliet, AICPA Peer Review Manager, and I met with the Institute's Director of Technical Services and Peer Review Manager to review the program's administration. We believe the administrative processes were being handled in a manner consistent with peer review standards.

We reviewed the files, which were still open due to follow-up actions, which had not yet been completed. We found that the follow-up actions were being effectively monitored for completion by the administrative staff and the peer review committee.

We also reviewed the policies and procedures for the granting of extensions. We found that the Director of Technical Services and Peer Review Manager handle short-term extension requests with discussion from the committee when the circumstances warrant.

We also reviewed the timeliness of technical reviews and the preparation of committee decision letters. We found no problems in these areas.

The Institute has developed a backup plan to support the Institute's peer review staff if they become unable to serve in their respective capacities.

### **Website Information**

We met with the Peer Review Manager responsible for management of peer review content on the Institute's website to review the administering entity's procedures to determine if the information disseminated regarding the AICPA Peer Review Program by the administering entity on their website is accurate and timely.

The AICPA staff's review of the website material identified various references to Peer Review resources where links were inactive and other information was missing within the website. We learned the Peer Review Manager was already aware of the issues which were attributed to a recent platform conversion. The design and functionality issues impacted the Institute's entire site. The Peer Review Manager had been actively working to address the issues with the developer until leadership made the decision to take down the new website and replace it with the prior site. That decision was made prior to the oversight visit, and it was evident staff would be monitoring the peer review information for accuracy and functionality in connection with the replacement.

### **Working Paper Retention**

According to discussions with the Director of Technical Services and Peer Review Manager, we found compliance with the working paper retention policies for completed reviews.

### **Technical Review Procedures**

We met with the Institute's primary technical reviewer, to discuss procedures. He performs the majority of all technical reviews.

We reviewed the reports, letters of response, if applicable, and the working papers for several reviews being presented to the report acceptance bodies ("RABs") on August 23, 2018. We believe that all review issues were addressed properly by the technical reviewer before reviews were presented to the committee. This helped the acceptance process to be effective and efficient.

### **Review Presentation**

Reviews are brought to the RABs without open technical issues. Accordingly, it was not necessary for the committee to spend a great deal of time reviewing specific technical issues.

### **Committee Procedures**

We met with the committee chair and committee vice chair and discussed their procedures for disseminating the comments resulting from RAB observation reports to the appropriate individuals.

On August 23, 2018, we attended three on-site RAB meetings as well as the peer review committee meeting. We observed the RABs' acceptance process and offered our comments at the close of discussions.

The RAB meetings were very orderly and it was apparent that the RAB members had reviewed the reports and working papers prior to the meeting and had a good understanding of the program to reach an appropriate decision for each review.

Appropriate decisions were made in the acceptance process, including assigned corrective actions and reviewer monitoring. Reviews were being presented to the RABs on a timely basis.

### **Oversight Program**

The Institute's peer review committee has adopted a formal oversight program that is well documented. We reviewed the document and procedures performed and found it to be comprehensive.

While we observed that reviewer performance monitoring is in place, feedback is being issued and that reviewers are being oversights, we believe more attention needs to be directed towards patterns of deficiencies and the issuance of performance deficiency letters.

### **Summary**

Our observations to enhance the Institute's administration of the program are summarized as follows:

Subsequent to our visit we confirmed that the replacement of the website has occurred, and the Peer Review Section issues identified have been completely resolved. Therefore, we have no further observations to be communicated with respect to this matter.

However, we do recommend that the administering entity develop a means to identify patterns of reviewer deficiencies and issue performance deficiency letters where warranted.



Thomas J. Parry, Member, Oversight Task Force  
AICPA Peer Review Program



FICPA Peer Review Program  
Administered in Florida by the  
Florida Institute of CPAs



AICPA Peer Review Program  
Administered in Florida by the  
Florida Institute of CPAs

January 10, 2019

Brian Bluhm, Chair,  
Oversight Task Force  
AICPA Peer Review Board  
Palladian I Corporate Center  
220 Leigh Farm Road  
Durham, NC 27707-8110

Re: Oversight Visit to Florida Institute of  
Certified Public Accountants

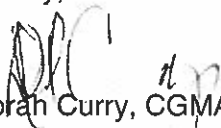
Dear Mr. Bluhm:

This letter represents our response to the report and letter of procedures and observations issued in connection with the review of the Florida Institute of Certified Public Accountants' administration of the AICPA Peer Review Program performed on August 22<sup>nd</sup> and 23<sup>rd</sup>, 2018. The matters discussed herein were brought to the attention of all peer review program committee members, administrative staff, and technical reviewer(s). In addition, the matters discussed in this letter will be monitored to ensure they are effectively implemented as part of our administration of the AICPA Peer Review Program.

Observations that did not affect the report:

While the FICPA Peer Review Committee and the FICPA as administering entity has had a process in place for over 20 years of tracking reviewer performance feedback via an excel spreadsheet and reviewer watchlist, we recognize that the focus of that review has been at the subcategory level within an area of feedback rather than looking at the broader feedback categories. As a result, the FICPA Peer Review Committee and the FICPA will also review the broader categories on an ongoing basis to determine if there are patterns of reviewer performance feedback for which reviewer deficiency letters should be issued. In addition, the Committee will be reminded on the fact that a reviewer deficiency letter should be viewed as a remedial and educational part of enhancing reviewer performance rather than focusing on the punitive nature of such a letter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Deborah Curry', with a large, stylized initial 'DC'.

Deborah Curry, CGMA, President-CEO  
State CPA Society Chief Executive Officer

A handwritten signature in black ink, appearing to read 'Robert LaPlant', written in a cursive style.

Robert LaPlant, CPA  
Chair of the Peer Review Committee of the  
Florida Institute of Certified Public Accountants