

**From:** David Dennis [<mailto:ddennis.cpa@gmail.com>]

**Sent:** Wednesday, May 04, 2016 8:43 AM

**To:** Lisa Snyder

**Cc:** Kelly, Veloria; Paul N. Brown; [curryd@ficpa.org](mailto:curryd@ficpa.org)

**Subject:** Florida Board of Accountancy Response to Omnibus Proposal on Ethics

Ms. Snyder,

Thank you for the opportunity to comment on the Omnibus Proposal dated November 15, 2015. At our April 29, 2016 Florida Board of Accountancy Board meeting, we voted to send the attached draft with our position on the Omnibus Proposal. Our comments on the questions follow.

1. Proposed Interpretation "Transfer of Files and Return of Client Records in Sale, Transfer or Discontinuance of Member's Practice"
  - a. We agree that members should be required to obtain consent from clients before transferring any client files to the successor Firm in connection with an acquisition or merger. We believe that notice should be required in engagement letters that nonresponse within 90 shall be deemed to be consent.
2. Revised Interpretation "Disclosing Client Information in Connection With a Review or Acquisition of the Member's Practice"
  - a. We agree that members should not use information obtained in a review of a practice to their advantage or disclose confidential information obtained during the review.
3. Proposed Revised Interpretation "Disclosing Client Information in Connection With a Review or Acquisition of the Member's Practice"
  - a. We think that the language in 1.700.050 (3) should be modified to permit disclosure of such information as required by law or judicial order.
4. Proposed Interpretation "Disclosure of a Commission and Referral Fee"
  - a. The question asked whether a delayed effective date would be necessary. We do not believe a delayed effective date is necessary.

Thank you for the opportunity to provide our input.

Regards,

David Dennis,

Florida Board of Accountancy, Chair

cc: Veloria Kelly, Executive Director, Florida Board of Accountancy  
Debra Curry, Paul Brown, FICPA