

Active Ethics: How Doing the Right Thing Helps Everyone

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Today's Agenda

- ✓ Risk Management Trending Risks: An Update
- ✓ Engagement Letter Clauses to Consider
- ✓ A Risk Management History of the SSARs
- ✓ Risk Management Best Practices
- ✓ Ethical Dilemmas — What Would You Do?
- ✓ Closing Comments

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Trending Risks: An Update

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Employee Retention Credit

Taxpayers potentially ineligible for or overstated ERC claim

- Contingent fees prohibited¹
- Extended statute of limitations poses “whipsawed” predicament
- Accounting issues:
 - Is eligibility “probable”?
 - Disclosures
- ERC promoters’ spurious arguments (e.g., OSHA closure orders)
- IRS’s 2023 and 2024 Dirty Dozen list of tax scams
- Eligible entities not timely applying for the credit
 - 941-X are considered filed April 15 of succeeding year²
- Moratorium may be over, but IRS perceives 85% of ERC claims deserve further scrutiny
- Financial reporting for ERC ≠ correction of an error (M-1 adj.)
- IRS letter 6612
- Will ERC claims be honored if related ITR was not amended?

¹ Treasury Circular 230 § 10.27(b) and ET 1.510.001 *Contingent Fees Rule*

² Form 941-X Instructions

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Employee Retention Credit

IRS introduced new programs:

- 1st Voluntary Disclosure Program [Expired 3/22/24]
- 2nd Voluntary Disclosure announced 8/15/24 [Expires 11/22/24]
- Withdrawal Program

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Employee Retention Credit

Continued

Risk management tips

- Inform clients of eligibility and concerns
- Document having communicated eligibility/concerns
- Consider NOCLAR implications
- Obtain client acknowledgment/representations
- Consider protective elections
- Disengage if client lacks integrity
- Inform clients of need to timely/knowledgably respond to their IRS letter 6612

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Employee Retention Credit

Continued

Resources

- [Announcement 2024-30 2nd ERC Voluntary Disclosure Program](https://www.irs.gov/pub/irs-drop/a-24-30.pdf)
<https://www.irs.gov/pub/irs-drop/a-24-30.pdf>
- [IR-2024-12 IRS reopens Voluntary Disclosure Program](https://www.irs.gov/newsroom/irs-reopens-voluntary-disclosure-program-to-help-businesses-with-problematic-employee-retention-credit-claims-sending-up-to-30000-letters-to-address-more-than-1-billion-in-errant-claims)
<https://www.irs.gov/newsroom/irs-reopens-voluntary-disclosure-program-to-help-businesses-with-problematic-employee-retention-credit-claims-sending-up-to-30000-letters-to-address-more-than-1-billion-in-errant-claims>ERC Voluntary Disclosure Program
- [IR-2024-13 IRS provides details of 2nd ERC Voluntary Disclosure Program; program for improper claims open through Nov. 22 | Internal Revenue Service](https://www.irs.gov/newsroom/irs-provides-details-of-second-employee-retention-credit-voluntary-disclosure-program-program-for-improper-claims-open-through-nov-22)
<https://www.irs.gov/newsroom/irs-provides-details-of-second-employee-retention-credit-voluntary-disclosure-program-program-for-improper-claims-open-through-nov-22>

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Employee Retention Credit

Continued

Resources Continued

- [IRS Office of Chief Counsel Generic Legal Advice Memorandum \("GLAM"\)](https://www.irs.gov/pub/lanoa/am-2023-005-508v.pdf)
<https://www.irs.gov/pub/lanoa/am-2023-005-508v.pdf>
- [IRS ERC Resource Center](https://www.irs.gov/coronavirus/employee-retention-credit)
<https://www.irs.gov/coronavirus/employee-retention-credit>
- [OPR Alert 2023-02 – Professional Responsibility and the Employee Retention Credit](https://www.irs.gov/pub/irs-utl/2023-02-professional-responsibility-and-the-employee-retention-credit-R2-508-compliant.pdf)
<https://www.irs.gov/pub/irs-utl/2023-02-professional-responsibility-and-the-employee-retention-credit-R2-508-compliant.pdf>
- [IRS Alert IR-2023-105 Warning Signs of Misleading ERC Scams](https://content.govdelivery.com/accounts/USIRS/bulletins/35c897e)
<https://content.govdelivery.com/accounts/USIRS/bulletins/35c897e>

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Employee Retention Credit

Continued

Resources Continued

- [AICPA Employee Retention Credit Resource Center](https://www.aicpa-cima.com/resources/toolkit/employee-retention-credit-guidance-and-resources)
<https://www.aicpa-cima.com/resources/toolkit/employee-retention-credit-guidance-and-resources>
- [Employee Retention Credit Client Documentation Memo Template](https://www.aicpa-cima.com/resources/download/employee-retention-credit-client-documentation-memo-template)
<https://www.aicpa-cima.com/resources/download/employee-retention-credit-client-documentation-memo-template>
- [IRS Order Halting New Employee Retention Credit Processing](https://www.irs.gov/newsroom/to-protect-taxpayers-from-scams-irs-orders-immediate-stop-to-new-employee-retention-credit-processing-amid-surge-of-questionable-claims-concerns-from-tax-pros)
<https://www.irs.gov/newsroom/to-protect-taxpayers-from-scams-irs-orders-immediate-stop-to-new-employee-retention-credit-processing-amid-surge-of-questionable-claims-concerns-from-tax-pros>
- [ERC Voluntary Disclosure Program](https://www.irs.gov/newsroom/irs-new-voluntary-disclosure-program-lets-employers-who-received-questionable-employee-retention-credits-pay-them-back-at-discounted-rate-interested-taxpayers-must-apply-by-march-22)
<https://www.irs.gov/newsroom/irs-new-voluntary-disclosure-program-lets-employers-who-received-questionable-employee-retention-credits-pay-them-back-at-discounted-rate-interested-taxpayers-must-apply-by-march-22>

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Corporate Transparency Act / Beneficial Ownership Information Reporting

- CTA reporting requirements:
 - Reporting companies formed < 1/1/24 → by 1/1/25
 - New reporting companies formed > 1/1/24 → within 90 days of formation or registration
 - Changes or corrections → within 30 days
- Complicated exemptions
- Penalties for noncompliance
- Unauthorized practice of law? (MD, NJ, IA, VA, ?)
- Inform/advise clients in writing regarding beneficial ownership reporting requirements
- Modify engagement letters to scope out assisting clients with CTA compliance
- CPAs should notify their clients that it is advisable to consult an attorney
- Use distinct engagement letters for (1) administrative assistance, (2) new reporting, and (3) corrected reporting

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CTA/BOI Risk Management Tips

- Suggest clients consult with qualified legal counsel regarding whether to update/revise agreements to include provisions related to the CTA such as:
 - Representations by each shareholder, member or partner agreeing to comply with or be exempt from the CTA;
 - Covenant by each shareholder, member or partner requiring continued compliance with and disclosure under the CTA or to provide evidence of exemption from its requirements;
 - Indemnifications by each shareholder, member or partner to the company and its other owners, for its failure to comply with the CTA or for providing false information; and
 - Consents by each disclosing party authorizing the company to disclose identifying information to FinCEN, to the extent required by law.

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CTA/BOI Risk Management Tips

Continued

- **Familiarize** yourself with CTA and the beneficial ownership reporting requirements and remember — “the devil is in the details”
- **Assess** your firm’s knowledge, expertise, competency and risk tolerance to perform CTA compliance work
- **DOCUMENT**
 - Inform/warn clients **in writing** regarding beneficial ownership reporting requirements. *(Refer to CAMICO’s Client Notification Template)*
 - Modify existing tax and financial statement engagement letters to scope out assisting clients with CTA compliance. *(Refer to CAMICO’s FAQ for sample disclaimer language)*
 - Issue stand-alone engagement letters for any CTA-related services. *(Refer to CAMICO’s sample engagement letter template for “Administrative Services — Filing of Initial BOI Report”)*

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CTA/BOI Risk Management Tips

Continued

- **Recognize and address** any “client expectation gap”
- **Be wary** of “engagement creep”
- **Ensure** your firm has a robust cybersecurity strategy given the significant amount of additional personally identifiable information (“PII”) you will receive from each beneficial owner
- **Tread carefully** as performing services for clients outside of the purview of your licensure or your competencies poses significant liability and insurance coverage risks
- **Prepare** your own firm if you must comply with the CTA

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Outsourcing

Factors to consider

- | | |
|----------------------------------------------------|-------------------------------------------------------------------|
| ■ Reputational risk? | ■ Less expensive? |
| ■ General standards | ■ 24/7 accessibility |
| □ Professional competence | ■ Client consents |
| □ Due professional care | ■ IRC §7216 |
| □ Planning + supervision | ■ Assess potential coverage implications |
| □ Sufficient relevant data | ■ Review agreements to ensure confidentiality of clients’ records |
| ■ Low unemployment rate | ■ CA, SEC, and DOL requirements |
| ■ AICPA rules (ET sections 1.150, 1.300 and 1.700) | |

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Foreign Outsourcing Consent

Issue

- CPA plans to outsource work to a Texas company
- Some of the Texas company's personnel are in India
- Is consent necessary, and if so, what is recommended?
- What would be the biggest issues? Specifically, if we outsource audit and/or review engagements to another CPA firm?

What would you do?

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Foreign Outsourcing Consent

Continued

Response

- Shared CAMICO's outsourced foreign consents
- Recognize G-L-B Act is applicable to CPAs
- Suggested establishing protocol prohibiting outsourced firm from working on any tax returns where the file does not already have consent AND
- Parse the file server so only those with consent are accessible to the outsourced enterprise
- Bold/italicize text to draw attention to client consent

ET 1.700.001 Confidential Client Information Rule; IRC 7216

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Foreign Outsourcing Consent

Continued

Response *Continued*

- Outsourcing priorities in no particular order (all are high)
 - Get client's consent
 - Have consent comply with IRC 7216 (if tax information is shared)
 - Competence of the outsourced party
 - Suitable arrangement letter with outsourced party describing scope and limits of the engagement (yours, theirs, and mutual client)
 - Take appropriate precautions to assess the outsourcing entities' cyber protections
 - The outsourced entity's professional liability insurance is sufficient to protect YOU (you don't want to be insuring BOTH of YOU)

ET 1.700.001 Confidential Client Information Rule; IRC 7216

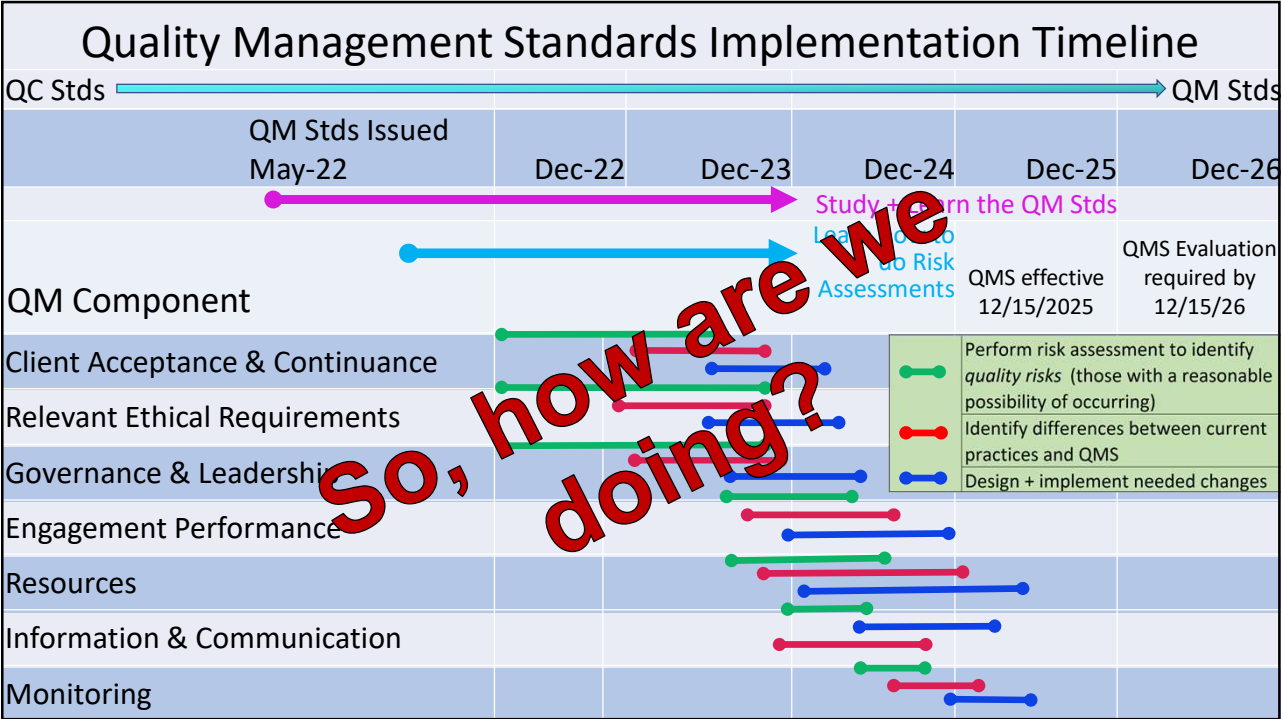
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ChatGPT and Generative Artificial Intelligence

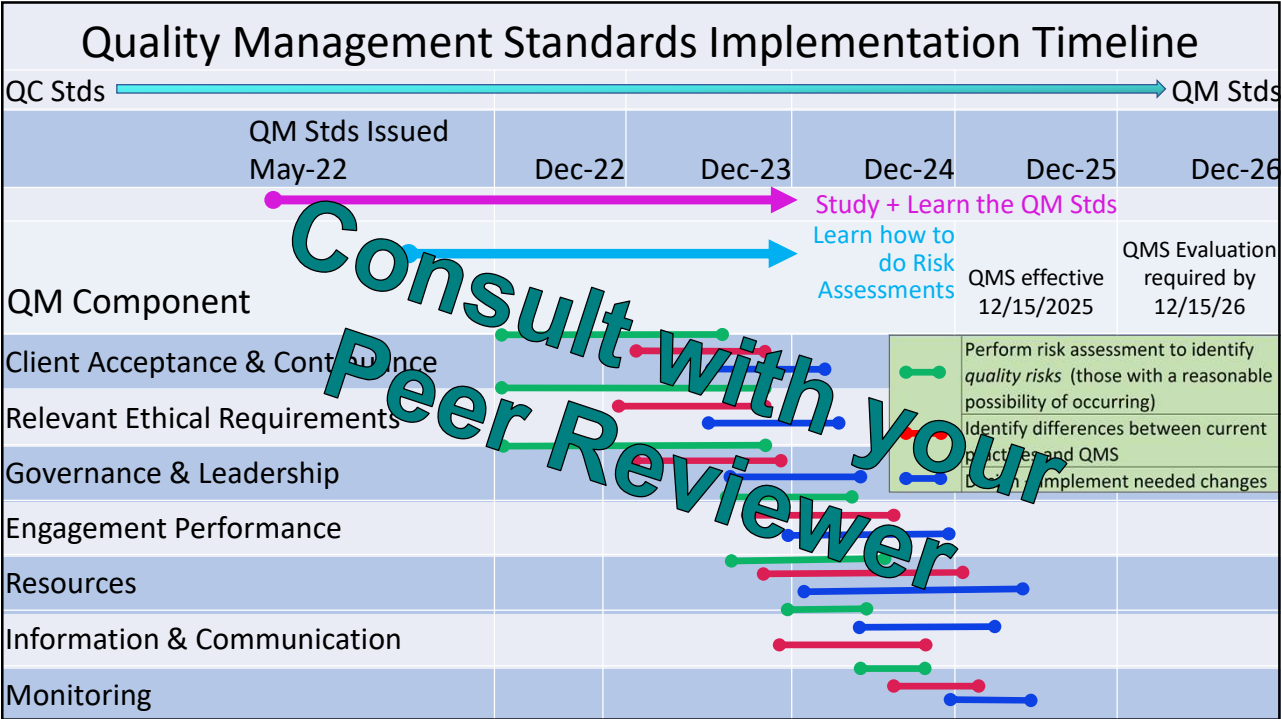
- The future/disruption is coming ...
- Prioritize client confidentiality
- Exercise appropriate due care and professional judgment as you review and interpret the accuracy of the data provided

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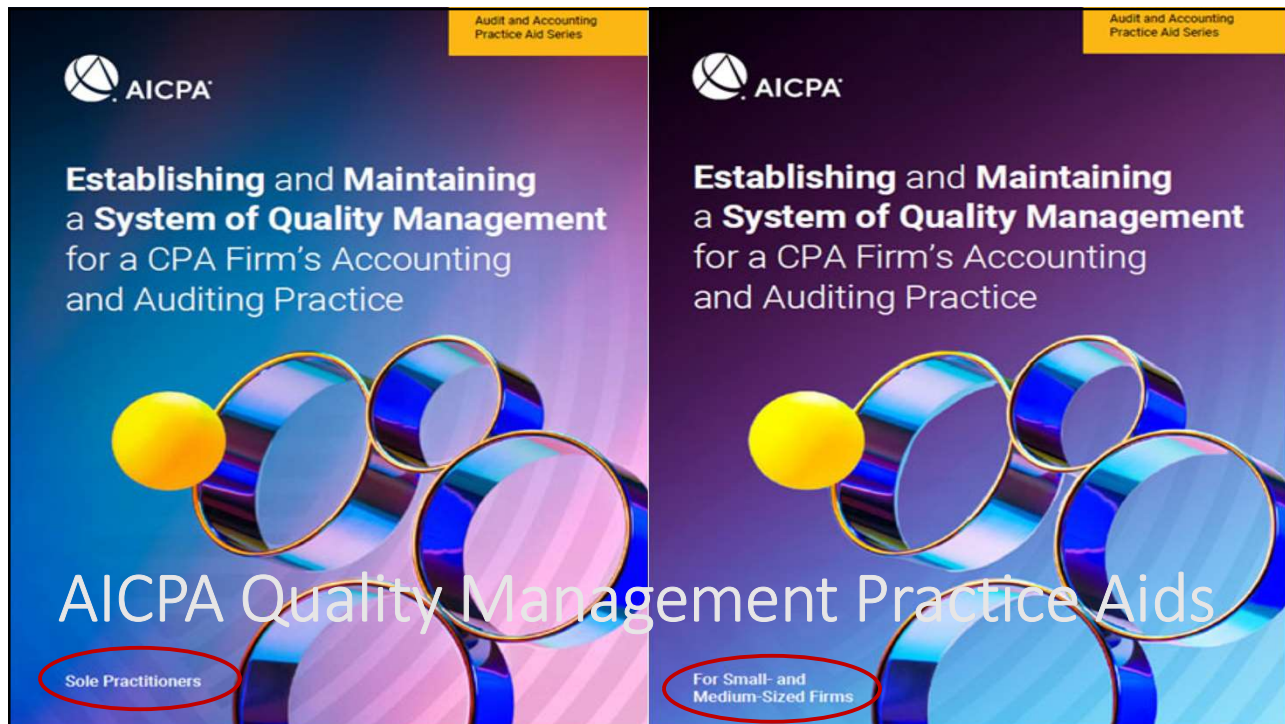
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Quality Management Risk Management Tips

- **Don't let "perfect be the enemy of good"** — If unchecked, this aphorism can create crippling inertia in the development of your quality management process
- **Obtain your peer reviewer's insight and tips specific to your unique needs** — Be cautious of impairing your peer reviewer's independence
- **Two-phased brainstorming**
 - 1) Generate ideas without evaluating or critiquing
 - 2) Constructively evaluate the initial phase's ideas
- **Take care** — To address each component's quality objectives

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AICPA Quality Management Practice Aids

■ Latest resources

- Risk Assessment MS Excel Template
- Sole Proprietor Practice Aid
- Small- and Medium-Sized Firms

<https://www.aicpa-cima.com/resources/download/free-practice-aid-set-up-your-a-and-a-quality-management-system>

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Other AICPA QM Standards' Implementation Resources

■ Other AICPA Resources

- [Quality Management Resource Center](#)
- [Crosswalk from SQCS to SQMS](#)
- [QM Standards Checklist](#)

■ Journal of Accountancy Articles

- [Podcast: Tips for firms implementing quality management standards](#) – June 7, 2022
- [Quality management standards: How to perform a root cause analysis](#) – August 31, 2023
- [Quiz: Test your knowledge of the new quality management standards](#) – September 22, 2022
- [QM standards: Overview of the monitoring and remediation process](#) – September 28, 2023
- [How to implement the risk-based quality management standards](#) – October 1, 2023
- [QM is approaching faster than you think — get ready](#) – November 1, 2023
- [QM standards: How to perform a root cause analysis](#) – December 1, 2023

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Cyber Risks Continue

- CPA firms remain at higher risk for social engineering scams due to the types of information firms gather and store
- Remote workers have expanded potential access points and vulnerabilities that hackers continue to exploit
- Common types of CPA firm–related breaches:
 - Wire transfer fraud / phishing schemes / ransomware attacks / malware
- Stay vigilant and be prepared:
 - Compliance with GLBA Safeguards Rule
 - Written Information Security Plan (WISP)
 - EDUCATE your employees
 - Maintain appropriate risk transfer solutions for 1st- and 3rd-party risks

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Other Trends...

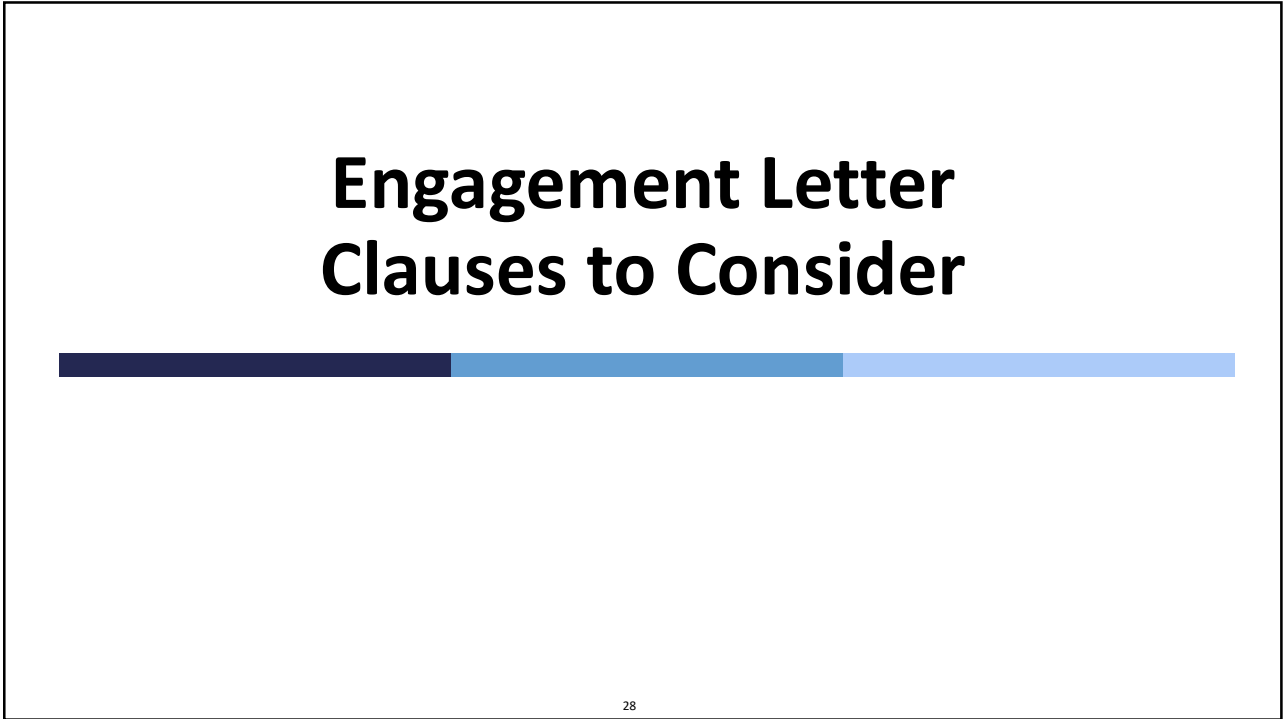
- Alternative staffing arrangements:
 - Offshoring / Onshoring
 - Firm employees working in other countries
- Practice continuation issues as CPA firms “close shop”
- NDAs and Confidentiality Agreements
- Indemnification clauses

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Use of a Third-Party Service Provider

The firm may from time to time, and depending on the circumstances, use third-party service providers in serving your account. We may share confidential information about you with these service providers but remain committed to maintaining the confidentiality and security of your information. Accordingly, we maintain internal policies, procedures and safeguards to protect the confidentiality of your personal information. In addition, we will secure confidentiality agreements with all service providers to maintain the confidentiality of your information and we will take reasonable precautions to determine that they have appropriate procedures in place to prevent the unauthorized release of your confidential information to others. *In the event that we are unable to secure an appropriate confidentiality agreement, you will be asked to provide your consent prior to the sharing of your confidential information with the third-party service provider. Furthermore, the firm will remain responsible for the work provided by any such third-party service providers. [Emphasis added]*

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Tax Data Processing Outside the U.S.

Beginning in 202X, <Firm> will use the third-party data entry services provider, <Name of Company>, to assist our firm with entering basic data and information into our electronic tax preparation software program. This change in practice is being initiated to help streamline our tax preparation process so that we can focus our time and expertise on technical tax compliance issues. <If applicable: <Name of Company> is a U.S. owned service bureau that employs offshore personnel to assist with the data entry.> Our due diligence of this provider included investigating their technical competencies and security policies. We are comfortable that <Name of Company> has strong protection and security systems in place to safeguard your confidential information. Please be assured that your tax return preparation and review will continue to be completed and signed by an experienced member of <Firm>. Regulations and our professional standards require us to obtain your consent before sharing your confidential information with <Name of Company> given that they are a third-party service provider with offshore employees. As such, we ask that you sign and return both the copy of this engagement letter and the attached consent.

IRC 7216 Implications: Add IRC 7216-compliant consent and specifically state if personally identifying information such as taxpayer's SSN may be shared.

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Engagement Letter Clause When NOT Rendering any CTA-Related Services

Starting in 2024, the Corporate Transparency Act (“CTA”) mandates certain entities (primarily small and medium-size businesses) created in or registered to do business in the United States report information about their beneficial owners — the individuals who ultimately own or control a company — to the Financial Crimes Enforcement Network (“FinCEN”). Management is responsible for <Client>’s compliance with the CTA, if applicable to its business, and for ensuring that any required reporting of beneficial ownership information is timely filed with FinCEN as required by the CTA. Our firm’s services under the terms of this agreement do NOT include any advising or consulting related to your entity’s compliance with the CTA. If you have any questions regarding <Client>’s compliance with the CTA, including but not limited to whether an exemption may apply to your organization or to ascertain whether relationships constitute beneficial ownership under CTA rules, we strongly encourage you to consult with qualified legal counsel experienced in this area.

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Engagement Letter Clause When Willing to Render CTA-Related Services

Starting in 2024, the Corporate Transparency Act (“CTA”) mandates certain entities (primarily small and medium-size businesses) created in or registered to do business in the United States report information about their beneficial owners — the individuals who ultimately own or control a company — to the Financial Crimes Enforcement Network (“FinCEN”). Management is responsible for <Client>’s compliance with the CTA, if applicable to its business, and for ensuring that any required reporting of beneficial ownership information is timely filed with FinCEN as required by the CTA. Our firm’s services under the terms of this agreement do NOT include any advising or consulting related to your entity’s compliance with the CTA. If you have any questions regarding <Client>’s compliance with the CTA, including but not limited to whether an exemption may apply to your organization or to ascertain whether relationships constitute beneficial ownership under CTA rules, please contact us. Any CTA-related services we agree to perform will be covered under a separate engagement letter.

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Tax – Virtual Currency/Digital Assets

Please note the Internal Revenue Service (“IRS”) considers virtual currency (e.g., Bitcoin) and other digital assets (e.g., NFTs) as property for U.S. federal tax purposes. As such, any transactions involving cryptoassets or transactions that use or exchange virtual currencies are subject to the same general tax principles that apply to other property transactions. If you had any cryptoasset or virtual currency activity during the <year> tax year, you may be subject to tax consequences associated with such transactions and may have additional foreign reporting obligations.

You agree to provide us with complete and accurate information regarding any transactions in cryptoassets or transactions using any virtual currencies during the applicable tax year. Please ask us for advice if you have any questions. If you require additional consulting services to evaluate the specific treatment of digital assets or virtual currency and we agree to perform such services, such services will be covered under a separate engagement letter.

- **CAMICO preference:** *Add this clause unless certain these transactions are not present.*

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Tax – Professional Judgment

*We will use our professional judgment and expertise to assist you **given the guidance as currently promulgated at the time our services are rendered.***

Subsequent developments issued by the applicable tax authorities may affect the information we have previously provided, and these effects may be material. Whenever we are aware that a possibly applicable tax law is unclear or that there are conflicting interpretations of the law by authorities (e.g., tax agencies and courts), we will share our knowledge and understanding of the possible positions that may be taken on your return.

*In accordance with our professional standards, **we will follow whatever position you request, as long as it is consistent with the codes, regulations, and interpretations that have been promulgated.***

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Tax – Independent Contractor/Employee Status

<Firm> will not be responsible for advising you with respect to classification of employees versus independent contractor status as part of our services. If you have any questions with such issues, we strongly encourage you to consult with legal counsel experienced in employment practice matters.

CAMICO preference: *Consider adding the above clause to all tax entity engagement letters.*

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Client Representations EL Clause

In accordance with the terms and conditions of this agreement, <Client Name> shall be responsible for the accuracy and completeness of all data, information and representations provided to us for purposes of this engagement. Because of the importance of oral and written management representations to the effective performance of our services, <Client Name> releases and indemnifies our firm and its personnel from any and all claims, liabilities, costs and expenses attributable to any misrepresentation by management and its representatives.

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Fraud Clauses to Consider

Clauses to Consider for Audit Engagement Letters

“As this engagement is not designed to be a fraud audit, management understands and accepts the inherent limitations of the audit services described in this agreement.”

Nonattest Engagement Letter Clause

“Our engagement cannot be relied upon to disclose errors, fraudulent financial reporting, misappropriation of assets, or noncompliance with laws and regulations that may have occurred. By your signature below, you understand and agree that you are responsible for preventing and detecting fraud.”

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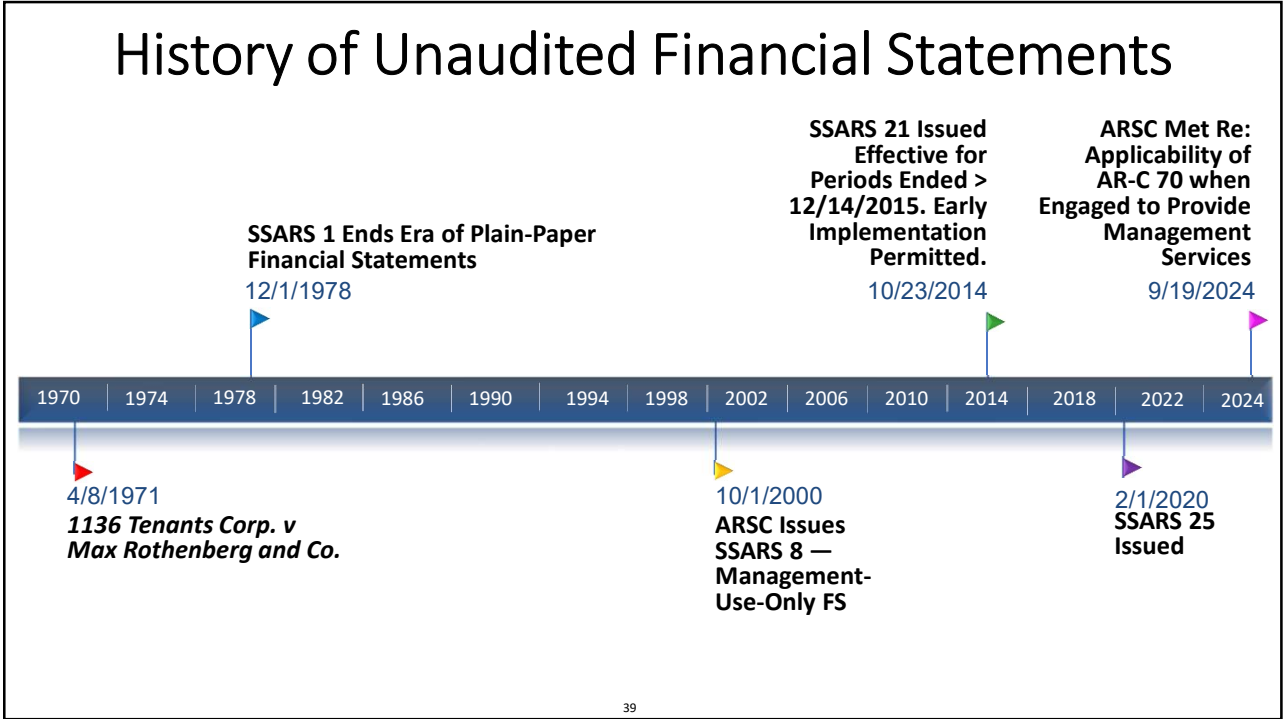
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A Risk Management History of the SSARs



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Recent ARSC Meeting

The ARSC met virtually Thursday, September 19, 2024, primarily to vote to expose the proposed SSARS, *Applicability of AR-C Section 70 to Financial Statements Prepared as Part of a Consulting Services Agreement* for public comment.

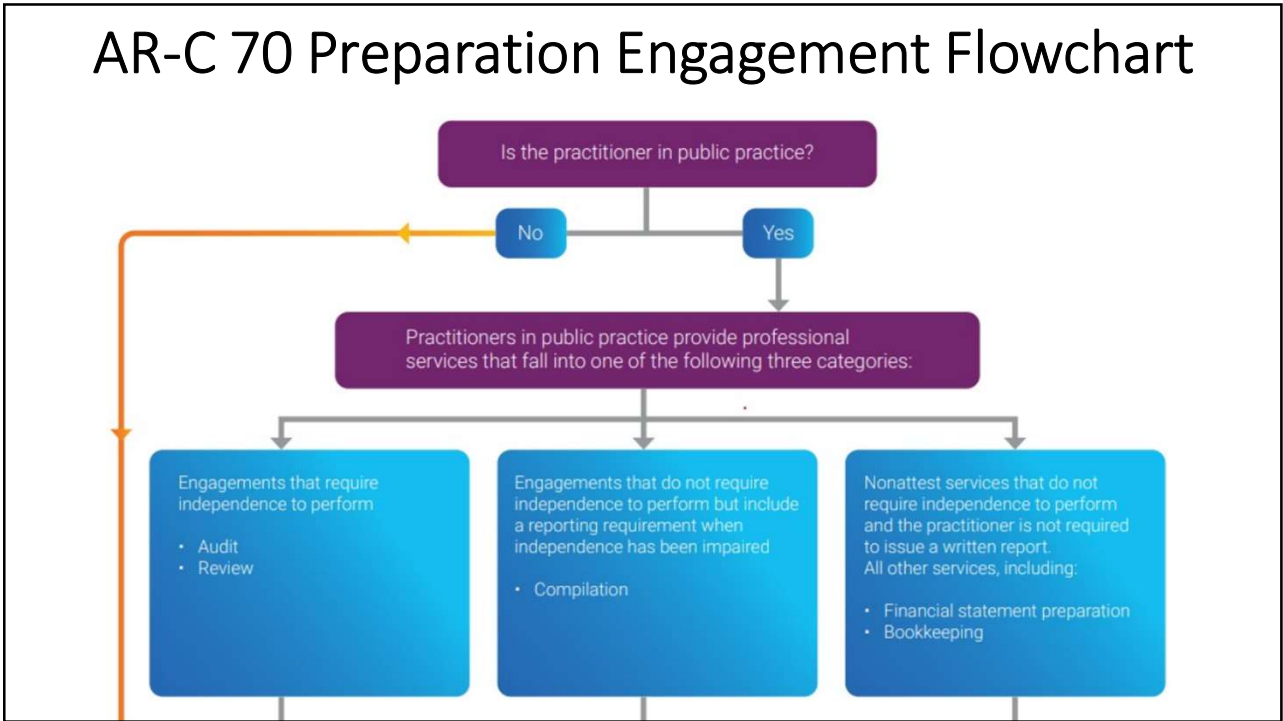
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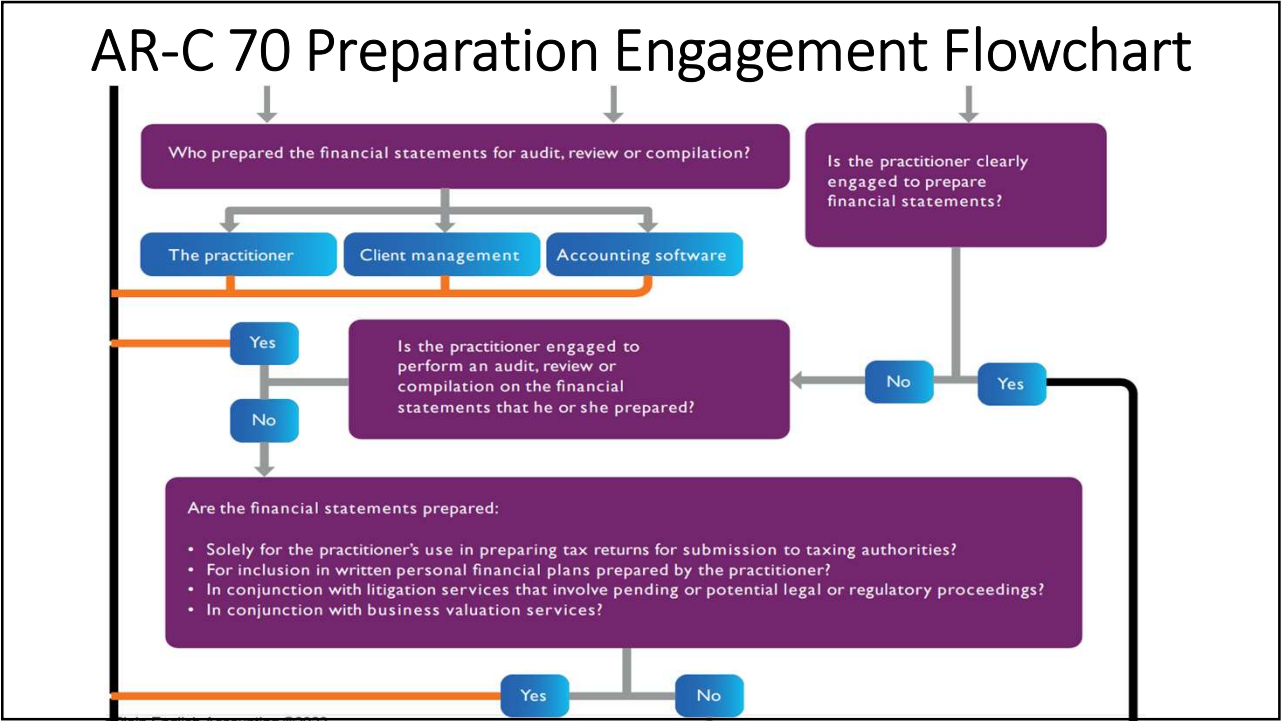
AR-C 70

Preparation Engagement Flowchart

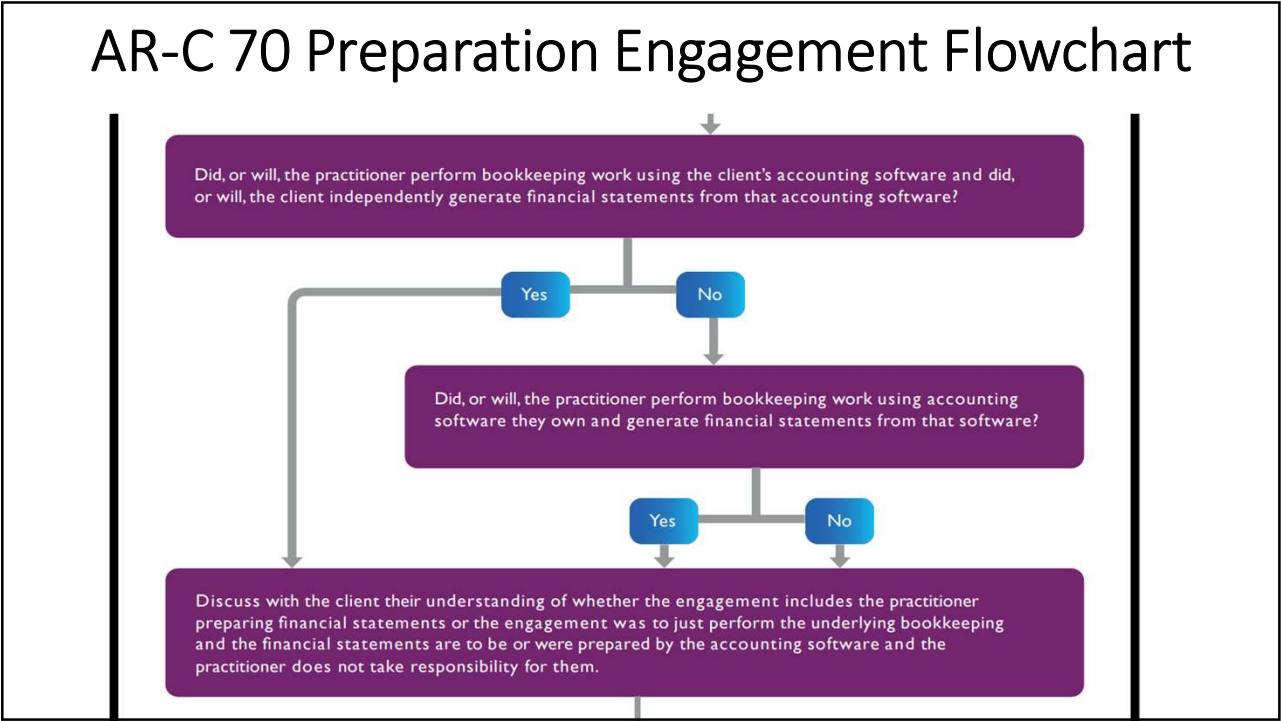
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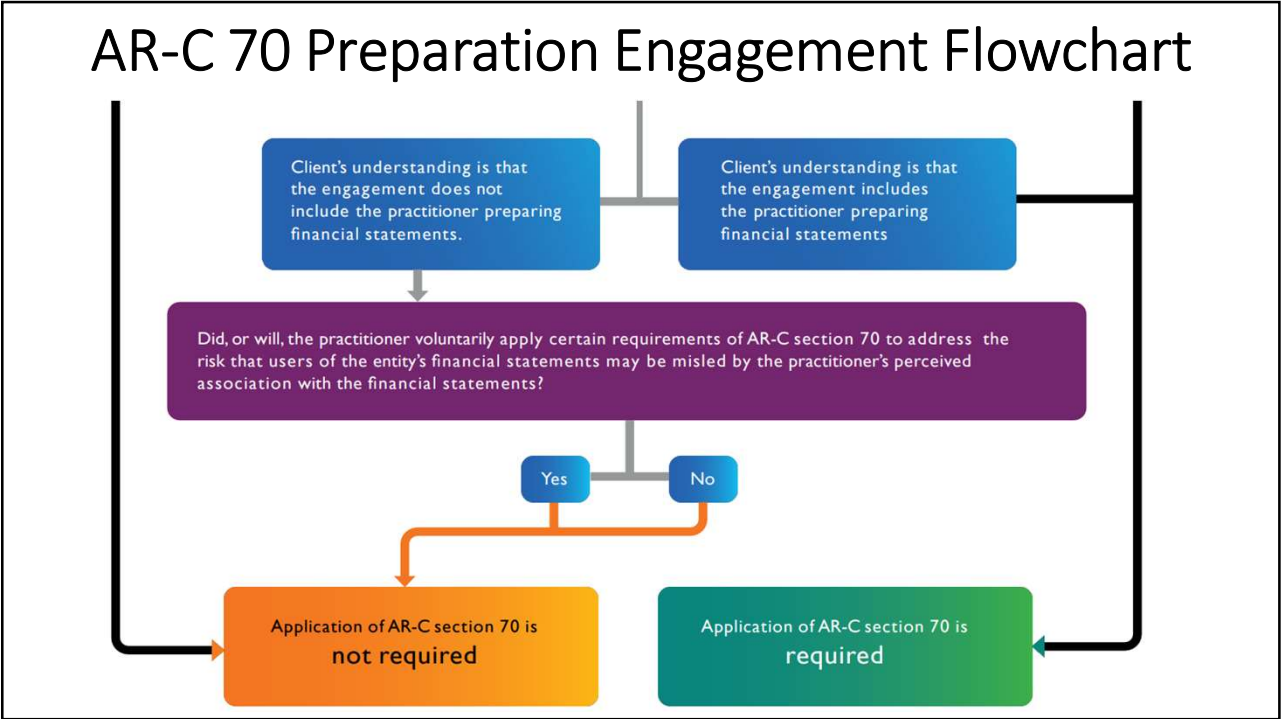




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Risk Management Best Practices

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Tax Loss Prevention Best Practices

- FIRAC [Facts, Issues, Rules of Law, Analysis/Argument, and Conclusion]
- Move FBAR and digital currency questions to organizer's FIRST page and have client initial YES or NO
- Don't sign IRS settlement agreements
- Contemporaneously memorialize and communicate interactions with other professionals (e.g., attorneys)
- Read Circular 230 and SSTs
- Inform/advise/consent

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Tax Loss Prevention Best Practices

Continued

- Consider Disclosure Statements 8275 and 8275-R
- Partnership representative = conflict of interest
- Tax engagement letters should specify/address:
 - Wayfair implications
 - Not designed to prevent or detect fraud
 - Which return(s)
 - Which state(s)
 - Which year(s)
 - The client's name(s)
 - The possibility of a return being selected for audit

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Loss Prevention Best Practices

- Implement ET 400
- Formal re-acceptance — list services — identify conflicts and risks
- Engage and disengage in writing
- EL risk-related clauses: Indemnification, limitation of liability, and stop work
- Retain your working papers
- Recognize and communicate conflicts
- Encourage specialization

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Loss Prevention Best Practices

Continued

- Suggest fraud hotline [but don't offer]
- Offer two-tiered bank reconciliation services
- Don't offer "comfort letters"
- Client portals
- Learn what is being communicated to Board of Directors and assess adequacy
- Assess materiality — regardless of service
- Respect email, texts, chats and emojis 🤩

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Loss Prevention Best Practices

Continued

- Reward financial and ethical achievements
- Emphasize the “tone at the top”
- Communicate expectations
- Detail bill
- Push back on Confidentiality and Business Associate Agreements
- “Incomplete — For discussion purposes only”

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Loss Prevention Best Practices

Continued

- Ask, “Why me?” [**now, not later**]
- Buy-sell agreements
- Maintain your objectivity
- Emphasize proactive documentation
- Recognize and address the “Expectation Gap”
- Don’t sue over fees
- Consult your risk adviser/CAMICO

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Ethical Dilemmas — What Would You Do?



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Bonding Company Wants Different Financial Reporting Framework

Issue

CPA performed a review engagement for its construction company client on the income tax basis of accounting. A month after issuance, the construction client's bonding agency indicated they needed the financial statements using a different financial reporting framework [FRF4SMEs].

What would you do?

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Bonding Company Wants Different Financial Reporting Framework Continued

Response

- Although permissible, it could be misleading to have two versions of the same period’s financial statements being used
 - Ask client who has received the income tax basis financial statements
 - Either:
 - ▢ Restrict distribution of FRF4SMEs financial statements to the bonding agency and the client
- OR
- ▢ Recall income tax basis version

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Can I Do This without Performing an Audit, Review or Compilation?

PROFIT AND LOSS STATEMENT

Please complete a separate Profit and Loss Statement for each business owned by the borrower(s). **This document must be completed by a Certified Public Accountant (CPA) either on this form or on a CPA - provided form.**

Name(s) of Borrower(s):

Company Name:

Type of Business:

For the Period: through
MM/DD/YYYY MM/DD/YYYY

Income:	Gross Sales and Receipts.....	<input type="text"/>
Other Income:	Other Income (e.g. interest, fees earned, etc.).....	<input type="text"/>
	Total Income (Gross Sales plus Other Income).....	<input type="text"/>

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Can I Do This without Performing an Audit, Review or Compilation?
Continued

Business Only Expenses:

Salaries Paid to Owners (other than to me/us).....

Benefits to Owners/Employees (other than to me/us).....

Payroll Taxes.....

Business Utilities.....

Insurance.....

Advertising.....

Telephone.....

Office Expenses.....

Repairs and Maintenance.....

Business Travel, Meals, and Entertainment.....

Other Business Expenses.....

Total Business Expenses.....

Net Income/Loss: (Total Income minus Total Expenses).....

Amount of Net Income that Borrower(s) Received.....

This form accurately states my/our business expenses and self-employed income for the stated period.

Borrower Signature

Date

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Can I Do This without Performing an Audit, Review or Compilation?
Continued

Response

The short answer is YES.

A more detailed response:

You are not compelled to accommodate a lender’s request for financial statements in support of a borrower’s loan.

If the lender insists on receiving financial statements, and you wish to accommodate the request, you may perform either a preparation (AR-C 70) or a compilation (AR-C 80) engagement. Prepared financial statements typically are NOT accompanied by a report, but they permit the CPA to issue a disclaimer.

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Can I Do This without Performing an Audit, Review or Compilation?

Continued

Response Continued

- Illustrative disclaimer language might read:

The accompanying financial statements of <Entity name> as of and for the year ended December 31, 2023, were not subjected to an audit, review, or compilation engagement by me (us) and I (we) do not express an opinion, a conclusion, nor provide any assurance on them.

- I typically discourage CPAs from issuing disclaimers on prepared financial statements, and instead suggest adding a legend as a footer on each page reading, *"No CPA provides any assurance on these financial statements."*

Preparation, Compilation and Review Guide Paragraph 3.35

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Can I Do This without Performing an Audit, Review or Compilation?

Continued

Response Continued

- On those occasions (hopefully rare) in which you opt to provide a disclaimer, retain the legend and do NOT reference your firm in the legend.
- You will need a signed engagement letter specifying the financial statements will indicate no assurance is provided.
- A compilation service always requires a report, would require you to consider whether you're independent, and indicate you are NOT independent in the engagement letter and your report.

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AR-C 70

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Can I Do This without Performing an Audit, Review or Compilation?
Continued

Response Continued

- If not already subject to peer review, a COMPILATION **would** subject the firm to peer review.
- If not already subject to peer review, a PREPARATION **would NOT** subject the firm to peer review.
- When subject to peer review, peer reviewers **may choose to select PREPARATION engagements for review.**

*AICPA Standards for Performing and Reporting on Peer Reviews
Effective For Peer Reviews Commencing On Or After May 1, 2022*

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Closing Comments



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Takeaways

- Consider expectations
- Communicate responsibilities
- Explain/document not so you can be understood, but rather so you can't be misunderstood
- Don't dabble
- Emphasize the "tone at the top"
- Recognize and respect the limits of your fraction of the CPA "body of knowledge"

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Remember → You can sell your services daily, but your reputation only once.

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Cute Picture, But...

When You're in Deep Trouble,
DON'T Look Straight Ahead,
Keep Your Mouth Shut and
Say Nothing



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Contact Information

Policyholders may always contact CAMICO with risk management questions and for advice:

- Toll-free: (800) 652-1772
- Via email:
 - Loss Prevention: lp@camico.com
 - Claims: claims@camico.com
 - Duncan: dwill@camico.com
- Website: www.camico.com

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Thank You



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