



CliftonLarsonAllen LLP
220 South Sixth Street, Suite 300
Minneapolis, MN 55402-1436

phone 612-376-4500; fax 612-376-4850
CLAconnect.com

July 6, 2022

Professional Ethics Executive Committee
American Institute of Certified Public Accountants (AICPA)
220 Leigh Farm Road
Durham, NC 27707

Via email: Ethics-ExposureDraft@aicpa.org

Re: Comments on Exposure Draft, “Proposed revisions related to officers, directors, and beneficial owners,” AICPA Professional Ethics Division, June 3, 2022

Dear Committee Members:

CliftonLarsonAllen LLP (CLA) appreciates the opportunity to comment on the June 3, 2022, AICPA Professional Ethics Executive Committee (PEEC) Exposure Draft (ED), which revises the following Ethics Interpretations (ET): “Offering or Accepting Gifts or Entertainment” interpretations (ET sections 1.120.010 and 1.285.010) and “Conceptual Framework for Members in Public Practice” (ET section 1.000.010). We understand that past revisions updated the threshold that defines where threats exist with ownership interests and the purpose of the proposed revisions is to align these interpretations with that new threshold.

General Comments

CLA supports the proposal, including the proposed effective date.

* * *

CLA appreciates the opportunity to review and offer our comments on the proposed interpretations.

Respectfully submitted,

CliftonLarsonAllen LLP