

**To:** [Comment Letters](#)  
**Subject:** Concern over self review standard proposal  
**Date:** Thursday, February 4, 2021

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I am writing to express my concern with the proposed self-inspection standards as documented on page 27ff of the proposed SQMS. As a sole practitioner who has been operating since 2009, I have found the prior position on self-inspection to be more than satisfactory. I believe that the new standards put a much higher burden on small firms and solo practitioners who will be forced to reach outside of their firm on an annual basis to comply with the new standards. The concerns raised by the AICPA PCPS Technical Issues Committee and listed in the proposed standards on page 29 resonate with me as a small practitioner. Audits that concerned areas of identified elevated risk already required a EQCR, which would have required outside consult for these same small firms. The EQCR will assess the QC for riskier engagements in between peer reviews, and then the system as a whole will be assessed in depth during the peer review every three years. Adding this extra inspection of non-EQCR engagements every year by an outside party will only serve to increase cost and compliance in areas of admittedly lower risk. The self-review threat is alleviated by the EQCR on specified engagements, the peer review every three years, continuing education that helps an auditor stay aware of requirements. Perhaps a better solution would be for firms that have a clean peer review report to be exempt from this requirement as they have demonstrated competence and professionalism, but for new firms or those with peer reviews with concerns to be subject to this self review standard since they have not yet demonstrated a proper QC environment at their firm.

Thank you for your time in hearing my concerns as a sole practitioner.

Thanks,

***Andy Collins, CPA***

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