

**From:** Dave Corbets <dac@c-acpas.com>  
**Sent:** Tuesday, August 31, 2021 6:10 PM  
**To:** Comment Letters <CommentLetters@aicpa-cima.com>  
**Subject:** COMMENTS ON EXPOSURE DRAFTS

TO AICPA QM EXPOSURE DRAFT COMMITTEE

You asked for comments so here they are:

In your communication you referred to the findings of the Peer reviewers and that they were significant and multiple but I did not get the impression that they were pervasive. However, they do need to be addressed, I personally do not believe the answer is more regulation under a new moniker. Moreover it is what is done with these findings and how we move forward dealing with them. It is not in my mind creating more rules and regulations which clearly do not clarify anything just add layers to the bureaucracy that already exists. If the peer reviewers are making significant recommendations in the reports before they are accepted and those finding/deficiencies are signed off by the firm being reviewed with a statement acknowledging their understanding and agreeing to any follow up procedures, where is the system breaking down? Should those firms be required to have an accelerated review? The responsibility of monitoring this falls on the AICPA.

These proposals are extremely damaging to small firms, in fact so much so that you may be on the threshold of restraint of trade with respect to a certain portion of your membership. Resources are mentioned in your draft they are not unlimited to small firms as they are extremely expensive, just ask me I know.

Our firm does an EQCR or pre-issuance on every attest engagement, it is always by the non-engagement partner and nothing leaves this office without that being completed.

Self inspection should not be prohibited. Really? Why would it be a requirement for a firm that has proven itself to be qualified professional organization be required to endure the expense and the scheduling inefficiencies and cost of an outside inspection. What are we? junior CPAS with limited licensures?

Please don't hesitate to contact me with any questions about my comments.

Thanks for your consideration.

David A. Corbets, CPA, CGMA

**Corbets & Associates**

33595 Bainbridge Rd, Suite 205  
Solon, Ohio 44139

Phone: (440) 349-0463 ext 204  
Fax: (440) 349-1142