Exhibit F, Implementation Period

Number	Position	Coded Text
055	Agree	The Committee agrees that an 18-month implementation period is appropriate and sufficient. However, the exposure draft is not sufficiently explicit about early implementation and making that explicit to allow for early implementation will ease the transition for some audit firms.
065	Agree	Yes
077[1]	Agree	18 months should provide sufficient time to complete the design and implementation of a new or enhanced system of quality management.
083	Agree	We agree that an 18-month implementation period is appropriate.
090	Agree	We agree that the implementation period is appropriate.
128	Agree	We support the proposed 18-month implementation period. We concur that it is in the public interest for the Proposed QM Standards to be effective as soon as possible; however, this should be balanced with appropriate time to effectively implement the Proposed QM Standards. As such, we agree that a minimum of 18 months between the issuance of the final standards and their effective dates is appropriate.
143	Agree	D&T is supportive of the 18-month implementation period. As noted in AICPAs Executive Summary – Project Level accompanying the exposure draft, it is clear that planning for the implementation of the new quality management standards should commence without delay. It is therefore our perspective that firms will have been given sufficient time to prepare.
146	Agree	Yes, the 18-month implementation period is appropriate. We believe it may be helpful to allow firms which are not also PCAOB registered firms, or firms that do not also provide services under the IAASB standards, to allow for an additional one year for implementation. This will provide additional time for risk assessment, development of practice aids, and internal training. It will also provide for some refinement of application and implementation materials as we anticipate additional application guidance will be forthcoming as firms start to implement these new standards.
150	Agree	an 18-month implementation period should be adequate.
159	Agree	Yes
166	Agree	I feel that the 18 month implementation period is appropriate.
168	Agree	Yes, the 18-month implementation period is appropriate. The Committee believes it may be helpful to allow firms who are not also PCAOB registered firms, or firms that do not also provide services under the IAASB standards to allow for an additional one year for implementation. This will provide additional time for risk assessment, development of practice aids, and internal training. It will also provide for some refinement of application and implementation materials as we anticipate additional application guidance will be forthcoming as firms start to implement these new standards.

[1] Shaded cell indicates multiple responses from same respondent with different position

Number	Position	Coded Text
005	Delay	Finally, I wish to say that the proposed effective dates are unrealistic and should be postponed by at least a year to enable CPA firms to learn more about the standards and to be able to take action to begin implementing them. First of all, nobody really knows when the proposed standards, as finally amended, will be approved and issued. After that occurs, there will be a distinct need to develop CPE for practitioners and there will also be a major need for providers of practice aids to develop and release revised documents for their customers. This will not happen overnight and will most likely be delayed by publishers' production cycles. Expecting practitioners to understand, adapt to, and properly implement new standards too soon is unrealistic and would be a recipe for an increase in the number of CPA firms who may not be able to pass their peer reviews.
006 #6	Delay	The proposed December 2023 date requiring compliance for 2024 projects is overly burdensome. We strongly support the majority of the new SQMs; however, suggest they be delayed 12 months from the current dates included in the exposure draft. Having to completely rewrite quality manuals, revise processes and procedures, train all employees and have ample time to monitor and re-change policy within the current dates is of concern.
047	Delay	NASBA believes that the 18-month implementation period is appropriate for larger firms. However, we recommend the ASB bifurcate the effective dates of the proposed quality management standards between the larger and smaller firms. We recommend an additional 6 – 12 months for the smaller firms to implement the standards, which would provide them the opportunity for education and guidance from the experience of the larger firms and more time to plan for implementation.
061	Delay	CRI believes that the 18-month implementation period for the proposed QM standards may be difficult to achieve given similar implementation timelines for the following proposed standards: SAS No. 143, Auditing Accounting Estimates and Related Disclosures, and the proposed SAS Understanding the Entity and Its Environment and Assessing the Risks of Material Misstatement. In addition, the implementation of the QM standards will include the development of new methodology and practice aids that will, for smaller firms, be performed by vendors; and, these smaller firms will generally have limited control over the timeframes within which the vendors complete the development of these resources. We recommend that the implementation date of the proposed QM standards fall on a date later than December 15, 2023, for the reasons mentioned above. The next most likely implementation date would be December 15, 2024.
069	Delay	Given the disruption caused by the recent pandemic including related demands on the time of firm management, we believe the proposed implementation date should be delayed a year or two to give firm management more time to focus on required changes.

Number	Position	Coded Text
070	Delay	If the primary issue that has been raised by Peer review is that new standards are not timely implemented, then maybe it requires having implementation periods being four years for new standards. This would allow at least one Peer Review during the standard implementation period and allow for prospective remediation without jeopardizing a "pass" rating. The proposed dates are clear but raise an issue regarding the concerns expressed in the background information on page 7. Smaller firms rely on third party intellectual resources to provide material for their quality control systems. I suspect that larger firms also use this third-party information. Apparently, someone at the AICPA thinks that's an issue. It is very confusing. The proposed standard wants smaller firms to outsource quality review to a third party but has a problem with smaller firms using third party quality control materials. What is a smaller firm supposed to do to comply with the timeline requirement? Unlike the larger firms, smaller firms do not have a staff of policy and procedure writers.
071	Delay	The requirements of the Proposed Standard are complex and detailed guidance is needed. If implementation guidance, practice aides and other material is not readily available when the Proposed Standard is issued it will be difficult for firms to comply. Firms will not effectively be able to implement the Proposed Standard and the objective will not be achieved. Extending the implementation period to December 15, 2024, would allow firms to get through their busy seasons. while allowing the ASB adequate time to provide implementation guidance, practice aides, frequently asked questions, best practices, and other material to comply with the Proposed Standard or decide if they want to continue to provide such services. The Group does not believe the implementation period is sufficient for a change of this magnitude. The Group notes that it can take up to 12 months to update a quality control document, and the proposed standards will require significant revisions to a firm's quality control document. Additionally, firms will need ample time to revise processes and practices, and to train engagement teams. Further, firms that are undergoing required peer review in the anticipated year of implementation will have further constraints on their time and ability to effectively implement the proposed standards. The Group notes that in its comment letter to the IAASB on its proposed quality management standard, the AICPA indicated that a minimum of 24 months for implementation "is necessary for the intended benefits of the Proposed Standards to be achieved, and not create potential unintended consequences related to audit quality." We concur with that statement.
074	Delay	While no substantive changes are needed for the TN Department of Audit due to our existing quality management policies, procedures, and practices, we agree with allowing audit organizations a minimum 18-month period (but preferably 24-month) to establish or modify their quality management policies, procedures, and practices for transitioning to those new policies, procedures, and practices. The proposed standard will require audit organizations to completely document the processes they currently use, in addition to new ones they create. The information and communication provisions of this ED may require firms to modify their processes for capturing and analyzing data. The proposed 18-month period assumes organizations have the resources, including IT capacity, for beginning implementation immediately. That is generally not the case, especially in terms of IT capacity. We again suggest a

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		longer implementation period (with encouraging early implementation) would allow sufficient time for planning, development, testing and implementation.
092	Delay	No, we believe the implementation period should be at least 24 months given the other auditing standards firms will need to implement during this time frame. Please provide additional details regarding your response, and, if applicable, explain what implementation period would be more appropriate. We believe the design, implementation, and evaluation of a system of quality management that complies with these proposed standards will be a significant undertaking for all firms. As most firms have yet to assess their current states, we believe that it is difficult to determine currently whether this implementation period is appropriate. Our suggestion is that, if the proposed guidance becomes effective, the ASB follow up with a sample of firms at a point during the implementation period to determine whether the implementation period should be re- evaluated.
093	Delay	Given the disruption caused by the recent pandemic including related demands on the time of firm management, we believe the proposed implementation date should be delayed a year or two to give firm management more time to focus on required changes
095	Delay	Depending on the final effective date of the proposed requirements, the committees think that the 18-month implementation date may be too short. It will take time for practice aids to be developed and the firm's documentation to be updated for the new requirements. The committees think that a minimum of 24 months may be necessary to obtain practice aids and to update the firm's quality management system and documentation.
098	Delay	Given the disruption caused by the recent pandemic including related demands on the time of firm management, we believe the proposed implementation date should be delayed a year or two to give firm management more time to focus on required changes. There are several new standards that become effective during this period. There should be a minimum of two years from the time that the standards affecting, leases in financial statements, employee benefit plan accounting and reporting, and revenue recognition before the implementation of the new quality management standard. This will allow smaller firms to have a path to success in adhering to and implementing the new quality management standard.
100	Delay	TIC is concerned that the volume of criteria and guidance included in the proposed SQMS will be daunting for many firms to determine how they should start implementing the guidance. We believe that this will be especially true for areas of the proposed SQMS which are not already included in extant guidance, such as the risk assessment process described in paragraphs 24-28. While the guidance that is included in the application and other explanatory material is helpful in understanding the requirements, TIC believes that it would be challenging for firms that do not have significant resources available to dedicate solely to implementing the standard. To address this concern, TIC suggests the development of a practice aid that would assist firms with clear steps on how to implement this portion of the guidance. Ideally, that practice aid would start with a less complex accounting firm that, for example, only performs compilations and reviews. Starting with a practice aid for a firm without high-risk engagements would provide the most useful resource to build upon. The

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		AICPA could then add additional modules to the base practice aid for more complex situations. This would have the dual benefit of being accessible without being overwhelming for less complex firms and customizable based on the nature of engagements performed. While the risk assessment guidance is where TIC believes many smaller firms will have the largest obstacles in implementation, the other areas of the quality management system, which have been modified from extant guidance and require a change to existing quality control processes, also will be challenging for many firms to identify given the volume of changes made in the proposed SQMS. As firms already have a quality control process in place based on extant guidance, TIC suggests that the Board and/or the AICPA create a guide which clearly links concepts in extant guidance with where they appear in the new guidance. This sort of document would provide the clearest pathway for understanding both how existing processes fit into the new requirements as well as help identify where there are gaps in the system which must be addressed in order to be in compliance. From experience with past standards, TIC is aware that, in many cases, smaller firms ultimately rely upon practice aids and implementation guidance provided by third parties or which have trickled down to them from larger firms. While both of these resources can be helpful and have many benefits, they are not a substitute for similar resources which are provided directly by the Board and/or AICPA.
100	Delay	While TIC acknowledges the need to implement the practices included in the exposure draft as soon as practicable, to enhance quality and serve the public interest, TIC does not believe that an 18-month implementation period is sufficient to implement such an extensive standard. As previously discussed in this letter, many smaller firms operate with limited resources available to implement new standards. While we recognize that page count of a new standard does not always equate with complexity of implementation of a standard, as of the date of this letter, there are issued SASs which are not yet effective that comprise over 1,100 pages of standards for practitioners to understand and implement. That total excludes the proposed quality management standards which are an additional 200 pages. As our comment letters have indicated over the past several years, while TIC supports the efforts of the ASB to improve standards, the volume of new guidance which has been issued and is not yet applicable verges on becoming overwhelming for firms which do not have the ability to dedicate extensive resources exclusively to implementation of these standards. For many smaller firms, a primary source of information both to inform and educate regarding upcoming changes to standards, as well as provide resources for implementation, are third-party resource providers. Given the volume of additional guidance which already is slated for implementation prior to the proposed quality management standards, TIC is concerned that the resource providers also will experience a resource crunch, delaying their issuance of implementation resources used by many smaller firms to assist them in adoption of the proposed standards.

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		An extension of the implementation period beyond 18 months also would serve to increase the opportunity for the peer review function to be included in the education process in a more comprehensive manner. TIC has heard feedback that many smaller practitioners gain significant knowledge and insights regarding upcoming standards directly from their peer reviewers. By extending the implementation period, more firms would have the opportunity to discuss implementation of the new standards with their peer reviewers which would aid both in the ease of adoption as well as increase quality through learning of best practices being considered by other firms. While TIC understands that the Board has been working with peer review to ensure that they are operating in lock-step with regards to how quality management implementation issues will be evaluated as part of peer review, TIC remains concerned that a rushed implementation period could have additional unintended consequences in the form of peer review deficiencies. TIC would like to see an acknowledgement that quality management is a continual process of evaluation and enhancement and that firms will not be penalized for being in earlier stages of that process than others. Additional time being allotted for implementation of the standard would alleviate those concerns. TIC believes that the key to successful implementation of the quality management standards will depend on the availability of quality educational, implementation, illustration, and best practice resources. Delay of the proposed effective date would provide additional time for these resources to be developed, whether by the Board, the AICPA, 3rd party providers, or peer review, which would result in a more effective and efficient implementation of the standards. Lastly, delay of the proposed effective date would allow time for firms that are not implementing IASB ISQMs to learn from those that are.
103	Delay	Thus far, the AICPA has not provided any guidance that might alleviate the concerns our members have regarding the transition to the proposed standards. In fact, as of mid-June, there is no proposed transition/implementation guidance from either ASB or the Peer Review Board. We need this guidance in order to provide a definitive response as to whether an 18-month implementation period is appropriate or not. That said, we are concerned that an 18-month implementation period is not appropriate for all firms. We believe the proposed 18-month implementation period provides firms, especially small and medium-sized firms, insufficient time to learn and execute the requirements of the proposed standards. Large and multi-national firms who perform engagements subject to the international standards will have, effectively, already changed to the proposed standards in 2022, through the adoption of ISQM No. 1 and No. 2. However, the majority of CPA firms in the United States do not operate in the international arena; they are smaller firms who operate locally or regionally and have limited resources capable of applying the changes required by the proposed standards. Generally, such smaller firms have small quality control departments if they have such a department at all. We do not believe an 18-month implementation period provides

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		our smaller firm members sufficient time to learn the proposed standards and effect the changes to their quality systems without sacrificing engagement quality in the short-term as scarce resources are re-tasked toward implementation. We are also concerned that the smallest of firms, with the scarcest of resources, will decide to renounce the provision of assurance and attest services entirely. While some believe that small firms should not be in the assurance and attestation business at all, there are many, very small firms, who perform high quality engagements, and some are considered experts in certain industries. It would be detrimental to the profession if a standard forced these firms out of the attest business.
104	Delay	Earlier this summer an effective date of December 15, 2023, seemed reasonable as it appeared the effects of the pandemic were lessening. However, the increased anxiety and numbers as of late is creating challenges for businesses and firms alike. As CPAs, our obligation is to our clients, especially guiding them through this uncertainty. Not to lessen the necessity of improvements to our quality management system as noted by this proposal, but the current system is still adequate for the time being. A delayed effective date should be implemented, likely one additional year.
109	Delay	The Committee is concerned the 18-month implementation period may be insufficient to create the guidance necessary for proper implementation while allowing at least one cycle/year of engagements to be performed before a firm is subject to a peer review following these guidelines. In addition, peer reviewers would need some time to adjust how they perform peer reviews to ensure they can adequately evaluate the scalability sections in these standards. The Committee recommends a 30-month implementation period to allow firms at least two years to prepare for a peer review subject to these new guidelines. We feel the need to re-think how a system of quality management functions under a quality risk format may take longer than expected. This feeling is from the experience of how long it has taken auditors to fully implement a risk-based audit approach and the peer review team's ability to accept judgments that, while well documented, do not always match the risks they feel might have existed in an audit.
110	Delay	We believe the proposed implementation period should be increased by two years, from December 15, 2023 to December 15, 2025. This is because there will be (a) a need to develop and attend CPE on the proposed standards; (b) resource providers will need to update and rollout materials to assist in the risk assessment and response; (c) standards fatigue; and (d) limited resources at some firms that will impact the successful rollout of the proposed standards. Additionally, due to the increased costs associated with implementing these proposed standards, some firms with a smaller attest practice than our own may decide to eliminate certain service offerings because they will no longer provide a viable business model for them going forward. An extended implementation period would allow those firms sufficient time to evaluate and transition their practices. We believe that this is aligned with the spirit of the changes contained in the proposed standards and is focused on quality improvement.
112	Delay	The major problem with the proposed quality management standard is timing. The CPA profession at the local level is presently experiencing a “crisis” that I’m not sure the AICPA is aware of. This proposal, in and of itself, would lead one to believe that the AICPA is completely unaware of this crisis. The crisis is a dire shortage of quality

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		help, at every level. Small to medium sized CPA firms, simply cannot find staff, and staff members are leaving the profession at an alarming rate. Also, this proposal comes at a time when we are working in the middle of a pandemic, struggling to get people to work in the office or dealing with the challenges of having staff work remotely. In addition, the governments at the Federal, state and local level are continually changing the laws and the due dates for tax returns, and inventing things like the Paycheck Protection Program, Economic Injury Disaster Loans, Recovery Rebates, Employee Retention Credits, etc., that cause small businesses and individuals to turn to their accountants for help and advice. Also looming is a massive number of practitioners who are near, at or past their retirement age and are desperately looking to transfer their practices to similar-sized practitioners. Unfortunately, there are few firms, if any, who have the excess staffing to take on any new work. This is even more true at the peer review level. Many peer reviewers are unable or unwilling to take on additional work, and many are giving up that type of work to make time for their regular clients. This framework is NOT a time to impose new Quality Standards on the profession, especially since the standards involve independent reviews by reviewers who are not involved in the engagement. Most firms will need to hire an outside reviewer to do that work but, again, there is no one in the profession who has "free" time to take on that additional work. Even though the effective dates revolve around December 15, 2023, there would be a lot of time required in the year 2022 to get ready for these major changes.
113	Delay	Learning about the new quality standards and then designing and customizing a system of quality management will be a considerable project for firms and will ideally involve deep and thoughtful consideration. But firms are already in the midst of implementing multiple major accounting and auditing standards that were delayed due to the pandemic. The implementation dates in the proposed Statements do not seem reasonable based on the current environment. We suggest either a delay in the proposed effective dates of one or two years, or a staggered implementation based on firm size.
116	Delay	While the effective dates are clear, they do not take into consideration the strain the A&A community is currently experiencing due to implementing FASB 606 for certain clients due to COVID-19 delays, preparing to adopt the significant FASB standards that are effective for the 2022 year, and implementing SAS 134-137 over the next year. All of this is in addition to dealing with the significant effects of COVID-19 on internal processes and procedures, and all the new legislation as a result of COVID-19. Standard-setting bodies should consider the real-world impact of the pandemic on delays in providing A&A services and accordingly determine any effective dates from the perspective of A&A professionals that are providing services to the public. An 18-month implementation will be too short. This standard will force small to mid-size full- service CPA firms to consider whether they can afford to continue to provide

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		audit services under these new standards. It is impossible for the small to mid-size firms to address all the other pending standards and implement the significant changes to the quality management standard within the current time frames. The AICPA should acknowledge the fatigue of the profession and take proactive steps to help reduce the burden on its members. Otherwise, audit quality will continue to suffer. It was also mentioned during one of the Quality Management Roundtables that the ASB is concerned if the effective date is extended too far, firms might not take any action now and scramble to implement the new requirements later. However, extending the effective date an additional 18 to 24 months will allow the following to occur: AICPA to develop implementation guidance and continuing education courses Third-party providers to develop practice aids and other materials Peer review team captains to discuss the new Quality Management Standards with firms undergoing peer reviews in the next couple years as part of their normal exit conference discussions on newer professional standards. All three of these items should help to ensure a more successful implementation of the new requirements.
120	Delay	TIMING OF IMPLEMENTATION It depends – smaller firms will need guidance, practice aids – how quickly will that all be available? System review firms are already familiar with the concept of risk assessment because they have it on their audits; engagement review firms, not so much. Engagement review firms can become system review firms – and if they are to become good ones, then they need a QM system. Let's find a way to have this implemented properly up-front, so we won't be in a situation where "we'll catch it in peer review." To me that comes back to some sort of required training to start.
121	Delay	We would encourage the ASB to consider an 18-24-month period between the issuance of the Proposed Quality Standards and the design and implementation effective dates. We note that smaller firms and firms not subject to the international quality management standards may be challenged with implementing the revised standards and may need additional resources, organization changes and adequate time to thoughtfully address the requirements of the new standards. Effective dates should be predicated on expectations for first time implementation material availability. All firms will need ample time to adopt the new standards from when the first-time implementation materials become available. Early adoption of all or individual components of proposed SQMS No.1 should be permitted. Early adoption of all or part of each of proposed SQMS No. 2 and proposed QM SAS should also be permitted.
124	Delay	The committee strongly opposes the 18-month implementation period. Substantial guidance is needed before firms can start defining policies resulting from these changes. Providers of practice aids will need time to amend and update existing guidance and practice aids in order to provide tools firms have relied on in the past to make such significant changes to quality management systems. Additionally, firms will need time to contract outside arrangements, consider and redraft their policies and

Number	Position	Coded Text
		procedures, and consult their insurance provider. Further, the scope of these changes will require significant revisions to peer review standards, interpretations, and guidance. The level of effort and understanding for redrafting the standards, firm policies/procedures, and peer review program manual/team captain checklists will require a more extended period than 18 months. The committee believes as long as substantial supporting guidance is issued, a minimum of a 24-month implementation period is needed from the point of issuance.
125	Delay	Specific to the implementation date of the standards. Honestly, we have struggled with whether we feel the implementation period (18-months) is appropriate. Although we believe that it is incumbent upon firms and practitioners to be able to implement new standards, whether these proposed standards, or any others, the reality is that for some firms, especially smaller ones, they will either not understand how this impacts them, or will miss it altogether. This is not an excuse not to keep to a shorter implementation period, but we believe there will be a significant number of firms that don't comply timely, and it won't be discovered until the peer review occurs. Accordingly, we believe there will be better compliance if the implementation period extends long enough that the peer review program can be an resource to educate firms that this is coming, as opposed to penalizing the firms when they haven't appropriately adopted the standards.
130	Delay	While many smaller firms (ours included), have relatively robust Engagement Quality and Quality Management processes already established, we do not believe an 18 - month period is sufficient to put into place the additional new requirements. This timeline is particularly troublesome for smaller firms that have less formal engagement quality and quality management processes in place. This timeline is overly aggressive and will be burdensome.
132	Delay	I do not believe that the implementation timetable is sufficient. CPAs & firms will need much more time to: digest the meaning, application, and requirements, take CPE for ensuring understanding and clarity, evaluate, purchase, adopt, and implement technological and non-technological resources establish QM policies, identify qualified engagement reviewers and inspection persons, apply run throughs in evaluating the provisions and related control ensure proper transitions are set for the firm's peer reviews that might take place over the next 2 – 3 years, that the firm engagements match the requisite applicable standards, and allow firms to address their personnel resources in regards to complying with the standards

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134	Delay	As described in the body of our letter, we support the phased approach to the effective date. While we understand the desire for the proposed standards to be implemented as soon as possible, we have significant concerns that the proposed effective date, which is 18 months after the proposals are approved, would not allow sufficient time for firms to properly implement the standards and to properly address the new requirements, particularly firms that might not operate globally or adopt international standards. The short implementation period might lead to policies and procedures being implemented that do not fully address the proposed requirements and might be detrimental to audit quality in the short term. Therefore, we believe a longer implementation period is necessary. Based on our firm's ongoing implementation of the ISQM standards, SQMS 1 would require the dedication of a significant number of resources to establish a risk assessment process. In addition, resources would be needed to update firms' methodologies for the two other quality management standards that will become effective simultaneously. Many firms, regardless of size, would find it difficult to allocate additional resources and to commit the necessary time to simultaneously implement the proposed standards. If insufficient time is given for firms to implement SQMS 1 in particular, there is a risk that firms will take their existing system and make only minor adjustments to map the existing processes to the new requirements, rather than taking the necessary time to redesign the existing system to align with the fundamentally revised standards. Additionally, there are two other significant standards—SAS No. 143, Auditing Accounting Estimates and Related Disclosures, and SAS No. 145, Understanding the Entity and Its Environment and Assessing the Risks of Material Misstatement—with effective dates of periods ending on or after December 15, 2023. For a number of firms, the same pool of resources will be responsible for implementing all of these standards, for incorporating them into firm methodology, and for developing accompanying training. For firms to implement changes for five standards, four of which would likely represent significant changes, practically simultaneously may actually have an adverse impact on audit quality. Therefore, we believe that the effective date of the standard should be no less than 24 months from its approval. While we support the phased approach to the effective date, we are significantly concerned that the proposed effective date of 18 months from approval would not allow sufficient time for firms to properly implement and properly address the new requirements, particularly for those firms that might not operate globally or adopt international standards. The short implementation period might lead to policies and procedures being implemented that do not fully address the proposed new requirements and might impact audit quality in the short term.
135	Delay	With the backlog of work that exists in providing A&A services and the extended peer reviews, an 18-month implementation could be too short for some firms. The standard-setting committee will need to obtain information from firms on the amount of A&A backlog and extended peer reviews prior to determining an implementation date. Firms should have a 12-to-18-month extension available.Once the number of peer reviews on extension falls to pre-pandemic levels, it could be an indicator that the backlog of A&A engagements has been completed. The AICPA should acknowledge the fatigue of the profession and take proactive steps

Number	Position	Coded Text
		to help reduce the burden on its members. Otherwise, audit quality will continue to suffer. It was also mentioned during one of the Quality Management Roundtables that the ASB is concerned if the effective date is extended too far, firms might not take any action now and scramble to implement the new requirements later. However, extending the effective date an additional 18 to 24 months will allow the following to occur: AICPA to develop implementation guidance and continuing education courses Third-party providers to develop practice aids and other materials Peer review team captains to discuss the new Quality Management Standards with firms undergoing peer reviews in the next couple years as part of their normal exit conference discussions on newer professional standards. All three of these items should help to ensure a more successful implementation of the new requirements.
136	Delay	While the effective dates are clear, they do not take into consideration the strain the A&A community is currently experiencing due to implementing FASB 606 for certain clients due to COVID-19 delays, preparing to adopt the significant FASB standards that are effective for the 2022 year, and implementing SAS 134-137 over the next year, in addition to dealing with COVID-19 internally. Extending the effective date an additional 18 to 24 months will allow the following to occur: AICPA to develop implementation guidance and continuing education courses Third-party providers to develop practice aids and other materials Peer review team captains to discuss the new Quality Management Standards with firms undergoing peer reviews in the next couple years as part of their normal exit conference discussions on newer professional standards. All three of these items should help to ensure a more successful implementation of the new requirements.
137	Delay	Deferral of Proposed Implementation Date: We ask that you consider delaying the implementation of the final statement. Peer reviewers frequently educate firms on new standards. Deferring the implementation to allow all firms a peer review cycle will allow all firms the benefit of this resource. Staggered implementation dates could be considered, allowing smaller firms with limited resources more time to implement. We also believe that delayed implementation will allow third party practice material providers time to develop comprehensive materials and much needed t raining courses.
139	Delay	The proposed effective date of 18 months from the date the proposed standard becomes final seems to be too short. The ASB has said that it will issue guidance and we believe the ASB will need time to prepare such guidance. In addition, practice aids will need to be developed which will require implementation guidance from the ASB.

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		The Peer Review Board will need to develop new standards and checklists to address the changes made by this proposed standard. We believe that a staggered approach to implementation as suggested by the AICPA Peer Review Board makes good sense. Larger firms could begin implementing the proposed standard first. This approach would allow smaller firms more time to prepare for the transition.
141	Delay	I think 18 months is not enough time. There's much to digest here and we are still going through other standards updates and change implementations. I would prefer an additional 24 months – implement on December 15, 2025 but at a minimum would highly recommend at least another 12 months to December 15, 2024.
142	Delay	Implementation of the Proposed Quality Management Standards will require firms to bear considerable resources and costs to effectively adopt, and we believe the overall success of adoption could be negatively impacted by a compressed implementation timeframe. Sufficient time is needed to provide firms of various sizes and composition to evaluate, design, and implement the proposed standards, including the development of sufficient post-adoption monitoring processes. Therefore, we do not believe an 18-month implementation period is appropriate and recommend that the implementation period should not be less than 24 months from the issuance of the final standards. Furthermore, regardless of the implementation timeframe, we encourage the ASB perform a post- implementation economic analysis to better understand the benefits and challenges in adopting the Proposed Quality Management Standards.
144	Delay	18 months seems like the minimum for a firm my size considering the level of communication that will be required. For firms without full-time dedicated personnel in the "quality" space, I'd like to see a longer timeframe so that implementation can occur while also doing their "day-to-day" work. Smaller firms might also benefit from the implementation lessons learned by larger firms.
147	Delay	We believe the proposed implementation period and associated effective dates should be lengthened by an additional 12 to 24 months given the following: Need for robust education regarding the standard, particularly considering the expectation that firms must digest and implement a set of standards requiring critical consideration of quality risks and responses. Need for time to develop methods to accomplish mandated risk responses, specifically inspection by qualified individuals not involved with the engagement team. This will likely require a significant amount of inter-firm cooperation and consideration, including the cultivation of a level of connection amongst firms not currently available. Need for resource providers (including practice aid providers, education providers, and other organizations such as State CPA Societies) to develop programs and other methods of assisting with these risk responses. In addition to the above, the disruption caused by the recent pandemic including related demands on the time of firm management and the necessary extension of the

Number	Position	Coded Text
		comment period means the originally proposed effective dates are not as feasible. Unlike the implementation of other standards, the implementation of a new set of quality management standards may involve foundational shifts in how firms operate. Without sufficient time to educate firms and allow for adjustment, the proposed standards run the risk of having no actual impact on firm and engagement quality.
148	Delay	An 18-month implementation period is not sufficient for firms to adhere to the newly proposed standards. Due to the delays of COVID-19 and the backlog in auditing and attestation services firms provide, KyCPA requests an extension to the implementation period. Providing for an extension period of up to 18 – 24 months would allow firms additional time to review and implement compliance to the proposed standards. Any time period of 12 months or shorter would not be sufficient relief to firms that are continuing to recover from the COVID-19 pandemic economy.
155	Delay	We believe that an 18-month implementation is too short of timeline to implement for most firms. Firms will have a significant amount of work when going through the exercise of identifying, formalizing, and documenting policies as well as developing new policies where gaps exist. If the standard is finalized and issued in the fall of 2021, and education and training is provided during calendar year 2022, that would give firms limited time for implementation. The level of awareness of the significance of this standard among firms will vary, and in order to implement all the aspects of the standard in the proposed timeline, firms would need to start as soon as the standard is issued, which would be prior to when education and training would be available. Additional time will be needed for implementation materials to be developed as well as third-party practice aids. Also, a longer implementation period would allow for small to medium size firms to benefit from the experience of larger firms that are adopting the IAASB standards. Also, we believe the standard should be clearer regarding consideration of whether early adoption is disallowed
158	Delay	An 18-month implementation period may not be appropriate for all firms and we recommend an implementation period 24 months. Our concern is smaller firms do not prepare their own quality materials or methodology but instead rely on service providers (such as, AICPA, Thomson Reuters, or larger firms that license their quality materials or methodology). It will take time for the publishers of methodology to review, prepare and release the updates, and smaller firms that subscribe will have to review the changes, develop their adoption plan, and implement the new system of quality management.
162	Delay	No. We do not believe the 18-month implementation period is appropriate. While we believe that many firms already apply some of the various risk-based elements of the proposed quality management standards, we believe there are multiple factors that make an extended implementation period appropriate: Much of the current procedures in place were not documented or structured with the proposed SQMS contemplated. As such, a large amount of time may be spent documenting compliance with the SQMS standards, The current worldwide situation with COVID 19 and related changes to workplaces is still in flux. A project such as implementing the proposed SQMS is likely to be time

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		intensive and may unintentionally divert resources from audit quality initiatives, which may erode audit quality, and not be in the public interest, Considering the large amount of time global firms have reportedly incurred on implementation of the corresponding international quality management standards; many non-global firms may not have the resources to effectively implement in an 18-month time frame, The need for more time for the AICPA to develop appropriate materials, to the extent not already in proposed application guidance, similar to the IAASB first time implementation guides, to assist firms, The need for more time for third-party vendors to develop appropriate materials to assist firms, and To allow for the PCAOB to come out with its version of the quality management standards, thus allowing firms and third-party vendors to develop materials that address the various sets of quality management standards. We recommend the following alternatives be considered: That the effective date be on a rolling basis based on the respective firm's peer review year with all firms' implementation starting the year after their next peer review. We heard this alternative mentioned publicly. While we recognize this adds to communication efforts and the development of application material, we believe this staggered approach will allow (1) firms to learn from one another, and (2) the ASB to obtain useful information to issue interpretive guidance ahead of most firms' implementation. A staggered implementation with the top-10 firms implementing as indicated in the proposed standard and the remaining firms implementing on the timeline in the bullet below. Extend the effective date two additional years beyond what the proposed SQMS indicates for all firms: audits or reviews of financial statements for periods beginning on or after December 15, 2025, and other engagements in the firm's accounting and auditing practice beginning on or after December 15, 2025 Systems of quality management in compliance with proposed SQMS No. 1 would be required to be designed and implemented by December 15, 2025, and the evaluation of the system of quality management required by proposed SQMS No. 1 would be required to be performed within one year following December 15, 2025.
163	Delay	Given the disruption caused by the recent pandemic including related demands on the time of firm management, and other standards that firms need to implement during this time, we believe the proposed implementation date should be delayed at least two more years to give firm management more time to focus on required changes.

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164	Delay	The proposed standard will require audit organizations to completely document all of the processes they currently use for risk assessment, resources, information and communication and monitoring and remediation, in addition to new ones they create. The information and communication provisions of this ED may require larger organizations to re-tool their processes for capturing and analyzing data. The proposed 18-month period assumes they have the time and resources, including IT development capacity, for beginning implementation immediately. In our experience that is not always the case, especially in terms of those requiring information technology department capacity. We suggest the Board consider extending the time for these changes for an additional 12 months beyond that envisioned, to allow sufficient time for planning, documentation, development, testing and implementation.
167	Delay	The implementation period is not appropriate for small firms with limited resources. We believe it could take 2-3 years to fully implement these standards, particularly if firms need to arrange for the involvement of outside resources for roles that were previously performed by internal personnel.
007	Never	In looking over the above referenced exposure draft, it seems that once again small CPA firms would be required again to change its system of quality control. I really feel like the AICPA does not recognize the amount of time and effort that small firms will need to implement these changes. This past year dealing with COVID and right before that the change in revenue recognition, I just don't feel like most small firms can handle changes at this time and to be honest, I don't really see where in the long run the changes would make a significant change in the quality of the work we perform on a day to day basis. I would love the AICPA to have GAAP tailored specifically to the small firm, who are dealing with the mom & pop shops and other small businesses that cannot afford to pay for the fees we have to charge to meet these principles which are designed for companies with a full blown audit and accounting department, that is not the case with a majority of our clients.
076	Never	We are opposed to any changes to existing QC guidance so any implementation is unneeded in our opinion.
014	Only with implementation guidance	The only way the effective dates make sense will be if they are preceded with appropriate education and implementation guidance that is widely available to ALL firms effected.
077	Only with implementation guidance	We recommend the Board strongly encourage firms in the importance of starting the implementation process for designing and implementing a new or enhanced system of quality management. There are many new requirements which have not yet been required to be documented or tested. These new activities may take a significant amount of time and resources to complete. Any changes or remediation will also take time to complete.
081	Only with implementation guidance	If the proposed standards are made more scalable to sole proprietors and smaller firms, we believe the proposed 18-month implementation period is appropriate. Otherwise, if the proposed standards as they relate to monitoring, self-inspection, and eligibility of engagement quality reviewers are not made more scalable to sole proprietors and small firms, these firms will need additional time to evaluate their current accounting and auditing practice and determine 1) if these outsourced functions are available, particularly in the case of specialized industries and 2) if the

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		additional financial burden of these outsourced services justify maintaining their accounting and auditing practice.
089	Only with implementation guidance	Most committee members found the 18-month implementation period appropriate, provided that application materials, non-authoritative guidance and training are made available sufficiently in advance of the effective date. A minority opinion of the committees expressed that additional time should be provided for engagement review firms who will be receiving oversight of their quality management systems for the first time (requesting one full peer review cycle.)
102	Only with implementation guidance	The majority of the Committee believes the proposals is overly complex and will be difficult for small and medium sized firms to understand and implement. The majority's reasons for this belief are as follows: There is concern among the members that the language required to understand and implement the management system is not clearly defined and is very subjective. This could result in a wide divergence in how each system is operated by small and medium sized firms. This divergence in practice could result in future disagreements between firms. See risk assessment below. Members believe there will be an undue burdensome cost to initially implement and then maintain the proposed management system. A cost that the small firms will not be able to pass onto its clients. Larger firms with multiple partners and managers already have QC systems in place and/or an appropriate staffing infrastructure that implementation of the new QCM standards will be less burdensome and implementable with minimal if any additional costs. Smaller firms will find it necessary to seek outside parties to achieve compliance with the standards, costs that they will have to absorb. Small firm members are concerned about the amount of time needed to both properly implement and maintain the management system. In addition to providing client service managing, members of small and medium size firms typically have administrative responsibilities. Implementation of a new QC system, including drafting new firm policies, determining how a firm will obtain compliance with the new standards and the myriad of other matters that will arise during the course of development and implementation will consume significant time. Many firms do not believe sufficient time has been provided to properly implement and ensure ongoing compliance. Since the belief is the quality management system will be complex there may not be enough time to implement and maintain the system in accordance with standards. Small firm members believe the standards will be hard to implement and that compliance in accordance with standards will be hard to document. See further comments below. As an example of the complexity faced by a small firm, as set forth in paragraph A113 third party resources used by a firm will require the firm to determine whether a resource from a service provider is appropriate for use in the firm's system of qualify

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		management or performing engagements . This will require the firm to obtain information about the resource provider from a number 0f sources. For small and medium sized firms this could be an overly complex exercise in obtaining and documenting the required information. There is concern that this requirement will result in no added value to the Firm if it properly performs engagements.
138	Only with implementation guidance	An 18-month implementation is appropriate if implementation guidance and tools are provided at the start of the implementation period. More specifically, guidance and tools for smaller firms that are not currently working towards the ISQM1 implementation.
156	Only with implementation guidance	We believe 18 months is an appropriate implementation period only with associated implementation guidance. We have spent considerable time reading and working to apply the proposed standard as well as those of the IAASB. We found the implementation materials the IAASB has issued so far (e.g., webinars, practice aids) to be extremely beneficial in furthering our understanding of the standard and how to apply it in our practice. Thus, issuance of nonauthoritative tools is a key element to promote comprehension and proper implementation of these standards and should be available at the beginning of the 18-month implementation period. Thus, we suggest the implementation period take into effect the AICPA's timeline to issue additional nonauthoritative guidance.
086	peer review concern	The proposed standards would require quality management systems to be designed and implemented as of a specific date and evaluated one year later. Is the intent to create a uniform peer review and monitoring period for all firms? The committees do not support requiring firms to change their monitoring procedures. There are many variables that go into determining an optimal year-end for monitoring, including the composition of the firm's engagements and year-ends and the availability of qualified quality management staff. For example, a niche firm that primarily performs employee benefit plan audits would not want to choose a Dec. 31 year-end as many of the engagements are not completed until Oct. 15. Thus, the monitoring of those engagements would be delayed. If a new monitoring period is being established by this proposed standard, how does the Auditing Standards Board expect firms to address partial-year monitoring and peer review periods? The committees support a transition process that is effective for a firm's monitoring period that begins after a specified date.
119	peer review concern	The proposed standards would require quality management systems to be designed and implemented as of a specific date and evaluated one year later. Is the intent to create a uniform peer review and monitoring period for all firms? We do not support requiring firms to change their monitoring procedures. There are many variables that go into determining an optimal year-end for monitoring, including the composition of the firm's engagements and year-ends and the availability of qualified quality management staff. For example, a niche firm that primarily performs employee benefit plan audits would not want to choose a Dec. 31 year-end as many of the engagements are not completed until Oct. 15. Thus, the monitoring of those engagements would be delayed. If a new monitoring period is being established by this proposed standard, how does the Auditing Standards Board expect firms to address partial-year monitoring and peer review periods?

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		We support a transition process that is effective for a firm's monitoring period that begins after a specified date. Effective Date Given the enormity of a transition to this new approach, we recommend an effective date of at least 30 months after the standards are final. Early adoption is unrealistic, as there are no supporting peer review systems (e.g., checklists, PRIMA changes, reports, etc.). The AICPA Peer Review Board suggests staggered implementation dates based on firm size, with the larger firms going first. We support this suggestion. It would alleviate some of the pressure on the quality control resources and allow more time for the smaller firms to prepare for the transition.
Roundtable 6-10-2021	Roundtable	Implementation For smaller firms, samples would be helpful as they will face difficulty implementing this. If you put out an example, firms are going to take and run with it even if it doesn't apply, so practice aids may be more helpful with their questions and guidance. Similar to flow chart, interactive yes/no questions. Let service providers put out examples to their niche. We are early in the process, and it will be difficult for service providers to find balance in guidance. Cannot simply "drop a document" into a system.
Roundtable 6-24-2021	Roundtable	o Add early implementation permittance language in SQMS 1 as separate suite of standards.
Roundtable 7-13-2021	Roundtable	o Worry regarding hours needed to implement – would be a full time job in current projections § Current projections show thousands of hours of work needed for changes
Roundtable 8-16-2021	Roundtable	· Implementation o Some firms have a few months to implement before their peer review while others have years o Create a tiered implementation timeline o Tie effective dates to peer review o need to be additional time for education on the standards themselves before implementation date o Need plenty of implementation guidance
Roundtable 8-16-2021 menti	Roundtable	Implementation o Implementation - what is the mechanism for helping firms implement and ensuring qualified inspectors exist. I realize implementation is not an ASB concern as much, but for something this foundational it should be o We need simplification.
Roundtable 8-16-2021 menti	Roundtable	· Implementation o How will firms handle when they have to implement in their PR year when others might have multiple years to implement before having PR? o Do you think that peer reviewers will essentially establish rules on how detailed the implementation is? o What thoughts have been given to the ability of engagement review firms to implement and how/if that will be monitored ultimately? o What's the impact of not implementing? o How will firms not having a system review be monitored for compliance? What is

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		the impact of noncompliance? o What would be your best advice to peer reviewers performing reviews in evaluating the system of quality control at the reviewed firms in light of the exposed standard?
Roundtable 8-19-2021	Roundtable	Implementation o Timing concerns – this seems like it could be someone's full time job to continuously monitor and remediate the SOQM § Smaller firms do not have the resources to devote to a full-time individual to monitor systems
102	Wait for PCAOB	In addition to the proposed carve-out provisions the Committee recommends three items with regard to timing. The first is the recommendation that any proposed standard related to the Quality Management System be deferred until the PCAOB finalizes its standard(s) on the Quality Management System required of PCAOB firms. The PCAOB is presently deliberating those standard(s). That way there will be no need to adjust for any conflicts arising for firms in having to implement two different sets of standards. The second recommendation is that the implementation date be staggered between large firms and small firms. It is recommended that a one or two year deferral be put in place for small firms after implementation by larger firms to enable the small firms to gain best practices from larger firms. The Committee recommends that the ASB consider the three bucket approach detailed above to determine the levels of each firm. Firms in buckets 2 and 3 referred to above would be eligible for a deferral for implementation and maintenance of the system. The third is that the December 15, 2023 will be a hardship for all firms to implement. Some small firms are still recovering from the business impact of the pandemic. Staffing shortages has magnified the workloads for remaining staff. Due to the complexity a lot of training will be required with little available time. It is recommended that the implementation date in SQMS #1 be pushed back at least one year to December 15, 2024. Some members have advocated that the implementation date be pushed back two years. The push back of the SQMS # 1 effective date will further necessitate the push back of the SQMS #2 effective date to coordinate with the implementation date. The reason for these requests are related to the learning curve that this standard will require. There will also be downstream changes that will result from adoption of the standards. The downstream effects of the standard once adopted will require changes to peer review standards, Yellow Book standards, ethics standards and other standards. The Committee recommends that all affected updates be coordinated with the implementation date of the standard. The new OMS standards are highly judgmental. Thus the roll out of the Quality Management System standards will require extensive training. No standard should be finalized until a full cost effective educational program is promulgated and implemented. One member of the Committee cited the learning curve on the present

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		risk assessment standard as an example of the learning curve that all small and medium sized firms will face with this standard. This extensive training is also a reason to push back the implementation date. The Committee members point out that small and medium sized firms will bear the brunt of training for this new standard, without the capacity to pass along these costs to clients, particularly for the firms that work with NFPs. NFPs are already feeling squeezed for contributions and are extremely fee sensitive. The educational program must include implementation standards as to how the Quality Management Standards will be interpreted under Peer Review Standards.
161	Wait for PCAOB	Additional considerations relevant to finalizing the proposed standards We believe there are interactions that need to be taken into account before the proposed standards can be finalized as described in our responses to Questions 1, 3, and 8. In particular, we believe the ASB's decisions in finalizing SQMS No. 1, including its effective date, should also take into account the PCAOB's progress on its quality management standards, given the ASB's strategic objective of avoiding unnecessary differences between the ASB's standards and those of the PCAOB. It would be unhelpful for the ASB to finalize proposed SQMS No. 1 and then potentially reopen it in response to developments in the PCAOB's standards. Similarly, the need for further actions by the PEEC, in relation to both the definitions of PIEs and discussion of the cooling-off period for engagement quality reviewers, may suggest the proposed standard should not be finalized before the PEEC's deliberations on these matters. Finally, consideration of how a firm's annual evaluation of its SoQM may relate to the triennial peer review for firms enrolled in the AICPA Peer Review Program and the conclusions that are made public (e.g., the peer review ratings of pass, pass with deficiencies, and fail) by the ASB and the AICPA Peer Review Program is necessary before proposed SQMS No. 1 is finalized. With regard to the proposed QM SAS, as noted in our response to Question 4, we believe there will be practical considerations for group audits in applying the proposed QM SAS that will need to be addressed. Accordingly, the ASB should defer finalization of the proposed QM SAS until its efforts to update AU-C section 600 are nearing completion. Need for a longer implementation period Regardless of when the proposed standards are finalized, given the effort needed by firms to achieve the objectives of a top-down, risk-based approach to the firm's SoQM, we believe an implementation period of at least two calendar years from the date of the issuance of the final SQMS No. 1 will be necessary. Building in this extra time would allow the ASB the opportunity to seek real-time feedback from firms on implementation experiences as well as to potentially understand how firms are developing and documenting their quality objectives, risks, and responses. Understanding such feedback will enable the ASB to consider whether additional guidance would be helpful to supplement the application material in the standard. Due to the interaction between proposed SQMS No. 1 and proposed SQMS No. 2, we

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		believe their effective dates should continue to be aligned. With regard to the proposed QM SAS, we believe the ASB should make the proposed QM SAS and the future revisions to AU-C section effective concurrently, similar to how the ASB approached the revisions to AU-C sections 540 and 315. Our initial view is that an 18-month period may not be sufficient given the potential impacts to methodology. We do not believe it is critical that the proposed QM SAS becomes effective at the same time as proposed SQMS No. 1.