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September 23, 2025

U.S. Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549

Re: SECURITIES AND EXCHANGE COMMISSION [Release No. 34-103803; File No. PCAOB-2025-01] Public Company Accounting Oversight Board; Notice of Filing and Immediate Effectiveness of Proposed Rule Change Postponing the Effective Date of Amendments to Board Standards, Rules, and Forms Adopted on May 13, 2024

Dear Office of the Secretary:

RSM US LLP (RSM, “we,” “our”) appreciates the opportunity to provide input on the proposed rule change by the Public Company Accounting Oversight Board (PCAOB or the Board) postponing the effective date of amendments to board standards, rules and forms adopted on May 13, 2024. RSM is the leading provider of assurance, tax and consulting services focused on the middle market, with nearly 18,000 professionals in 77 U.S. cities, six locations in Canada, one in El Salvador and four in India.

We support the PCAOB’s filing with the Securities and Exchange Commission (SEC or the Commission) to delay the effective date of QC 1000, *A Firm’s System of Quality Control* (QC 1000), and other new and amended PCAOB standards, rules and forms described in PCAOB Release No. 2024-005 for one year to December 15, 2026. Having additional time to prepare for and implement the PCAOB’s standard is important given the substantial changes required to ensure quality control systems meet the new standards.

We believe a firm’s quality control system is the foundation for audit quality and appreciate that the standards provide a comprehensive framework and support the shift to a principles-based, risk-assessment-driven quality control design.

As we wrote in our July 16, 2024, letter to the Commission, while we are encouraged that the standard adopted many enhancements to promote audit quality, we request that the SEC further consider incorporating additional modifications and viewpoints that follow.¹

Statutory Authority and Notice and Comment

Design-Only Requirement. We encourage the SEC to assess whether the design-only requirement is an appropriate mandate for registered firms that are not performing engagements in accordance with PCAOB standards.

External Quality Control Function (EQCF). We acknowledge and appreciate the efforts by the PCAOB to provide more clarity on the EQCF role since the final standard was issued. However, as discussed more fully in our 2024 letter to the SEC, we believe that there are challenges that remain for firms with respect to structuring this role in adherence with the PCAOB’s intent due to the financial and operational burden of compliance. The postponement of the effective date could be helpful to firms as they work through

¹ [RSM letter to the SEC on QC 1000](#), July 16, 2024

identifying individuals who can serve in this position and provide the PCAOB with additional time to issue further interpretive guidance clarifying this role.

Effective Implementation

We continue to believe that firms could benefit from flexibility in the timing of the quality control evaluation required by the standard, while also having access to implementation guidance illustrating the differences in the application of quality control standards issued by the International Auditing and Assurance Standards Board (IAASB), the American Institute of Certified Public Accountants (AICPA), and the PCAOB.

Fixed evaluation date of September 30. Requiring a fixed evaluation date different from other quality control standards or a firm's fiscal year creates logistical complexities and economic costs for both firms and the PCAOB. We recommend that firms be allowed to select their annual evaluation date.

Implementation Guidance. We acknowledge that the PCAOB has issued some QC 1000 implementation guidance to firms; however, we ask the PCAOB to provide additional written documentation on the evaluation differences and scope of certain specified responses because the standard differs from the IAASB's *International Standard on Quality Management 1* (ISQM 1) and the AICPA's Auditing Standards Board's *Statement on Quality Management Standards No. 1* (SQMS 1). Firms complying with PCAOB standards, ISQM 1 and (or) SQMS 1 will face challenges determining how to apply the standards concurrently. To be most helpful, the guidance requested from the PCAOB should address implementation challenges and clarify where the standards are intended to be applied differently and result in different processes and conclusions.

We strongly support the PCAOB's request to defer the effective date of QC 1000 by one year. Doing so provides firms with sufficient time to design and implement the systems, processes and controls aligned with QC 1000 and perform initial tests of the operating effectiveness of those controls prior to the first required evaluation date. This will enhance the quality of the implementation of the standards and thus enhance audit quality.

We would be pleased to respond to any questions the SEC or its staff may have about our comments. Please direct any questions to Sara Lord, Chief Auditor, at 612.376.9572.

Sincerely,

RSM US LLP

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