



February 21, 2020

Securities and Exchange Commission
File Number S7-26-19

RE: Proposed Amendments to Rule 2-01, Qualifications of Accountants

The Audit and Assurance Services Committee of the Illinois CPA Society is pleased to comment on the proposed Amendments to Rule 2-01, Qualifications of Accountants. The organizational and operating procedures of the Committee are reflected in the attached Appendix A to this letter. These comments and recommendations represent the position of the Audit and Assurance Services Committee of the Illinois CPA Society ("Committee") rather than any members of the Committee or of the organizations with which such members are associated.

As a Committee, we strive to ensure audit quality remains the focus, while advocating for effective and efficient rules and regulations to govern it. Similar to the Commission, we are unable to quantify the impact of the proposed changes, nor how the forthcoming revised PCAOB Quality Control Standards will be implemented in practice; however, we are supportive of the risk-based approach towards rule making.

We agree with the nature of the proposed changes and application of materiality in order to focus the independence analysis on relationships and services that are more likely to pose threats to an auditor's objectivity and impartiality. The Commission recognizes the structural complexities and nuances that exist in practice, and in an effort to expedite the learning curve and avoid understanding through enforcement, we request providing additional examples/scenarios along with the Commission's decision-tree in implementing the proposed standards and interpretations over Affiliates and Investment Company Complexes.

The Committee appreciates the opportunity to express its opinion on this matter. We would be pleased to discuss our comments in greater detail if requested.

Sincerely,

Scott Cosentine, CPA

Chair, Audit and Assurance Services Committee

Genevra D. Knight, CPA

Vice Chair, Audit and Assurance Services Committee



ILLINOIS CPA SOCIETY

APPENDIX A

AUDIT AND ASSURANCE SERVICES COMMITTEE ORGANIZATION AND OPERATING PROCEDURES 2019 – 2020

The Audit and Assurance Services Committee of the Illinois CPA Society (Committee) is composed of the following technically qualified, experienced members. The Committee seeks representation from members within industry, education and public practice. These members have Committee service ranging from newly appointed to almost 20 years. The Committee is an appointed senior technical committee of the Society and has been delegated the authority to issue written positions representing the Society on matters regarding the setting of audit and attestation standards. The Committee's comments reflect solely the views of the Committee, and do not purport to represent the views of their business affiliations.

The Committee usually operates by assigning Subcommittees of its members to study and discuss fully exposure documents proposing additions to or revisions of audit and attestation standards. The Subcommittee develops a proposed response that is considered, discussed and voted on by the full Committee. Support by the full Committee then results in the issuance of a formal response, which at times includes a minority viewpoint. Current members of the Committee and their business affiliations are as follows:

Public Accounting Firms:

National:

Todd Briggs, CPA
Scott Cosentine, CPA
Timothy Delany, CPA
Jennifer E. Deloy, CPA
James J. Gerace, CPA
Michael R. Hartley, CPA
James R. Javorcic, CPA
Huong Nguyen, CPA
Elizabeth J. Sloan, CPA
Amber Sarb, CPA
Richard D. Spiegel, CPA
Timothy Van Cott, CPA
Daniel Voogt, CPA

RSM US LLP
Ashland Partners & Company LLP
RSM US LLP
Marcum LLP
BDO USA, LLP
Crowe LLP
Mayer Hoffman McCann P.C.
PricewaterhouseCoopers LLP
Grant Thornton LLP
RSM US LLP
Wipfli LLP
Sikich LLP
Grant Thornton LLP

Regional:

Michael Ploskonka, CPA
Genevra D. Knight, CPA
Andrea L. Krueger, CPA

Selden Fox, Ltd.
Porte Brown LLC
CDH, P.C.

Local:

Arthur Gunn, CPA
Lorena C. Johnson, CPA
Mary Laidman, CPA
Carmen F. Mugnolo, CPA
Jodi Seelye, CPA

Arthur S. Gunn, Ltd.
CJBS LLC
DiGiovine, Hnilo, Jordan & Johnson, Ltd.
Mugnolo & Associates, Ltd.
Mueller & Company LLP



Industry/Consulting:

Rosi Hasan, CPA
Sean Kruskol, CPA

Northern Trust Corporation
Cornerstone Research

Educators:

Meghann Cefaratti, PhD

Northern Illinois University

Staff Representative:

Heather Lindquist, CPA

Illinois CPA Society