

December 6, 2022

Attn: QCMcontentexam@aicpa-cima.com

Re: Proposed Criteria for a Description of the Content of Quality Control Materials (QCM) and the Content of the QCM Related to the Relevant Standards and Interpretative Guidance

The views expressed herein are written on behalf of the Professional Standards Committee (PSC) of the Texas Society of CPAs (TXCPA). The PSC has been authorized by the Texas Society of CPAs' Board of Directors to submit comments on matters of interest to the membership. The views expressed in this document have not been approved by the Texas Society of CPAs' Board of Directors or Executive Board and, therefore, should not be construed as representing the views or policy of the Texas Society of CPAs. Please find our responses below to the proposed criteria in the above-referenced exposure draft.

Request for Comments:

1. Are any of the QCM description criteria or QCM content criteria unnecessary? If so, please identify them.

**Response:** The TXCPA PSC thinks that the proposed QCM description content and the QCM content criteria included in the proposal are necessary and reasonable.

2. Are there any criteria that need to be added to the QCM description criteria or QCM content criteria? If so, please identify them.

**Response:** The TXCPA PSC thinks that the proposed QCM description criteria and QCM content criteria are comprehensive.

3. Do you have any concerns about the relevance, objectivity, measurability, or completeness of any of the QCM description criteria or QCM content criteria? If so, please identify them and describe your concerns.

**Response:** The TXCPA PSC does not have any concerns about the relevance, objectivity, measurability or completeness of any of the QCM description or content criteria. However, it was noted that the document needs additional clarity in order to better comprehend and apply the criteria.

4. Is the implementation guidance helpful in understanding and implementing the QCM description criteria and QCM content criteria? If not, please identify those that are not and why.

**Response:** The TXCPA PSC found the implementation guidance helpful in understanding the QCM description and content criteria. However, we believe it would be helpful if examples of the application of these criteria are provided.

5. ASEC intends to make conforming changes to the QCM description criteria and QCM content criteria to reflect SQMS No. 1 prior to the effective date of that standard. Are any of the elements of SQMS No. 1 in conflict with the QCM description criteria or QCM content criteria such that the usefulness of these criteria or the related implementation guidance will be ineffective? If so, please identify these areas. And if so, would you recommend making these conforming changes prior to the release of these criteria?

**Response:** The TXCPA PSC does not know of any conflict between the proposed criteria and SQMS No. 1. When the actual guidance is issued and applied in practice, such conflicts may arise at that time. This may necessitate refining the criteria and reissuing for comment. Any conforming changes noted should be made prior to the release of the criteria, if possible.

We appreciate the opportunity to provide input into the criteria evaluation process and thank the ASEC for their efforts to continuously improve the quality control process.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Ramsey Womack III". The signature is written in a cursive style with a small flourish at the end.

J. Ramsey Womack III, CPA  
Chair, Professional Standards Committee  
Texas Society of Certified Public Accountants