

## Independent Accountant's Report

To Management  
Thomson Reuters (Tax and Accounting) Inc.

We have examined:

- The content related to the relevant standards and interpretive guidance in Thomson Reuters' quality control materials titled *PPC's Guide to Nontraditional Engagements*, October 11, 2024, 31st Edition, available in print and online at Checkpoint.RIAG.com (the "QCM Content")
- The accompanying description prepared by Thomson Reuters titled "Description, as of October 25, 2024, of Thomson Reuters' *PPC's Guide to Nontraditional Engagements*, October 11, 2024, 31st Edition" (the "Description")

Management of Thomson Reuters (Tax and Accounting) Inc. is responsible for the QCM Content being in accordance with the QCM Content Criteria included in Attachment A and for the Description being in accordance with the QCM Description Criteria included in Attachment A (collectively, the "QCM Criteria"). Our responsibility is to express an opinion on the QCM Content and the Description based on our examination.

Our examination was conducted in accordance with attestation standards established by the AICPA. Those standards require that we plan and perform the examination to obtain reasonable assurance about whether the QCM Content and the Description are in accordance with the QCM Criteria in all material respects. An examination involves performing procedures to obtain evidence about the QCM Content and the Description. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risks of material misstatement of the QCM Content and the Description, whether due to fraud or error. In making an assessment of the risks of material misstatement, we considered and obtained an understanding of internal control relevant to the subject matter in order to design procedures that are appropriate in the circumstances but not for the purpose of expressing an opinion on the effectiveness of internal control. Accordingly, no such opinion is expressed. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

We are required to be independent and to meet our other ethical responsibilities in accordance with relevant ethical requirements relating to the engagement.

In our opinion, in all material respects:

- The QCM Content is in accordance with the QCM Content Criteria specified in Attachment A.
- The Description is in accordance with the QCM Description Criteria specified in Attachment A.

This report is intended solely for the information and use of management of Thomson Reuters (Tax and Accounting) Inc., users and potential users of the QCM Content, and users' peer reviewers and regulators.

This report is not intended to be, and should not be, used by anyone other than these specified parties.

A handwritten signature in black ink that reads "Plante & Moran, PLLC".

March 12, 2025

## **Attachment A: QCM Content Criteria and QCM Description Criteria**

### **QCM Content Criteria**

The quality control materials (QCM) are in accordance with the following criteria:

**CC1:** The quality control materials content accurately reflects the standards and interpretive guidance addressed by the QCM and addresses the standards and interpretive guidance in the manner described in the description, including the following:

- a. QCM content reproduced in whole or in part from standards and interpretive guidance does the following:
  - i. Appropriately references the relevant standards and interpretive guidance to enable user firms to locate the content
  - ii. Agrees with the relevant standards and interpretive guidance
- b. QCM content derived from the standards and interpretive guidance explains, elaborates, interprets, or paraphrases the relevant standards and interpretive guidance in a manner that does not change the meaning and intent of the standards and interpretive guidance.
- c. QCM content that illustrates the application of the relevant standards and interpretive guidance is not in conflict with the standards and interpretive guidance.

**CC2:** QCM content

- a. Identifies assumptions or judgments made in developing QCM content related to the relevant standards and interpretive guidance, if any
- b. Identifies QCM content that is based on widely recognized or generally accepted practice rather than on the relevant standards and interpretive guidance
- c. Identifies QCM content that represents the QCM provider's opinion or interpretation of the relevant standards and interpretive guidance
- d. Uses the same terminology and definitions used in the relevant standards and interpretive guidance

**CC3:** QCM content does not omit relevant principles, topics, requirements, considerations, procedures, or other aspects of the relevant standards and interpretive guidance.

**CC4:** If the description indicates that a purpose of the QCM content is to provide a means to document compliance with the standards and interpretive guidance that the QCM address, the QCM content enables user firms to do so.

### **QCM Description Criteria**

The description of the content of quality control materials (the "Description") contains the following information:

**DC1:** An identification of the quality control materials addressed by the Description, including the following:

- a. The title of the QCM, including the version name, number, or date
- b. An indication of all formats in which the QCM are provided and, if the QCM are in the format of application software, all delivery methods

**Attachment A: QCM Content Criteria and QCM Description Criteria  
(Continued)**

**DC2:** An identification of any elements of the QCM content that are provided by another QCM provider

**DC3:** An identification of any elements (parts) of the QCM content that are not addressed by the Description. If applicable, identify how the elements relate to the entire QCM.

**DC4:** The date of the Description

**DC5:** A statement that “[*Identification of the QCM addressed by the description*] are quality control materials (QCM). The AICPA defines QCM as materials (for example, manuals or tools), including industry- or subject matter-specific materials, intended to enable the operation of a firm’s system of quality control and promote consistency in performing quality engagements. QCM may be made available through technology, for example, through automated tools and techniques, and IT applications. QCM address standards and interpretive guidance related to accounting; audit, attestation, review, compilation, or preparation engagements or other services that CPA firms may provide; or ethics, independence, quality control, quality management, peer review, or practice monitoring related to those services.”

**DC6:** An identification of the characteristics of the QCM, including the following:

- a. The type of QCM (what the QCM are) and purpose of the type of QCM
- b. The topics addressed by the QCM
- c. If the QCM are intended to be used for a specific type of engagement or specific aspects of an engagement, an identification of the characteristics of that engagement, including the following:
  - i. The relevant characteristics of the type of client for which the QCM are intended to be used, including the following:
    - Area of practice
    - Industry
    - Form or type of organization
    - Operational characteristics
  - ii. The characteristics of the type of engagement for which the QCM are intended to be used, including the following:
    - Area of service
    - Level of service
    - Unique characteristics of the engagement

**DC7:** An identification of any other QCM intended to be used in conjunction with the QCM content

**DC8:** An identification of the standards and interpretive guidance relevant to the QCM that the QCM address, including the following:

- a. The standard-setting body that issued the standards and interpretive guidance
- b. Either:
  - i. The date through which the QCM address issued and effective standards and interpretive guidance (date approach)
  - ii. The number and title of the most recently issued and effective standards and interpretive guidance addressed by the QCM (title approach)

**Attachment A: QCM Content Criteria and QCM Description Criteria  
(Continued)**

**DC9:** An identification of standards and interpretive guidance relevant to the QCM that were issued and effective up to the date (if using the date approach referred to in DC8bi) or the number and title (if using the title approach referred to in DC8bii) but:

- a. Not addressed by the QCM
- b. Not fully addressed by the QCM, including why the relevant standards and guidance were not fully addressed, and how they were addressed by the QCM

**DC10:** A description of how the QCM address standards and interpretive guidance relevant to the QCM that were issued but not effective up to the date (if using the date approach referred to in DC8bi) or the number and title (if using the title approach referred to in DC8bii), including the following:

- a. The title and effective date of the standards and interpretive guidance
- b. Whether the standards and interpretive guidance are addressed by the QCM and, if so, how they are addressed
- c. Whether the standards and interpretive guidance allow for early implementation or adoption

**DC11:** A description of the QCM provider's policy for updating the QCM content, including the nature and anticipated timing of updates

**DC12:** A statement that user firms are responsible for the following:

- a. Determining whether the QCM are suitable for the user firm's purposes
- b. Understanding that the QCM are not intended to be a substitute for the standards and interpretive guidance, an evaluation thereof, or professional judgment
- c. Using the most up-to-date QCM available that are applicable in the circumstances, including accessing and using the most recent and effective relevant standards and interpretive guidance that are not addressed or not fully addressed by the QCM
- d. Properly implementing the QCM and using professional judgment in the application of the QCM based on the facts and circumstances (for example, of each engagement)
- e. Providing the appropriate training for the use of the QCM and performing the appropriate supervision and review procedures regarding the use of the QCM based on the skill, training, knowledge, and experience of individual users within the user firm
- f. Identifying that there may be certain facts, circumstances, risk factors, or specific issues that exist for a particular client, engagement, or user firm that may not be addressed by the QCM; in that case, understanding that the QCM will require tailoring and augmentation to address such facts, circumstances, risk factors, or specific issues
- g. Monitoring the activities of standard-setting bodies for changes that would affect the user firm, including amendments of standards and interpretive guidance and deferrals of effective dates
- h. Complying with relevant professional standards and interpretive guidance
- i. Understanding that the effectiveness of the QCM is dependent on the user firm fulfilling the preceding responsibilities and the effectiveness of its actions

**Description, as of October 25, 2024, of Thomson Reuters' *PPC's Guide to Nontraditional Engagements*, October 11, 2024, 31st Edition**

*PPC's Guide to Nontraditional Engagements*, October 11, 2024, 31st Edition (the Guide), is available in print and online at Checkpoint.RIAG.com. The Guide consists of chapter text and multiple practice aids, including illustrative reports, engagement programs, checklists, and correspondence letters. These practice aids are included in this description and are available as uneditable PDFs on Checkpoint.RIAG.com as part of the Guide.

PPC's Workflow Tools are not included in this description. The Workflow Tools, which are designed to enhance productivity, efficiency, and quality when used in combination with the Guide, are available as PPC's Practice Aids. PPC's Practice Aids: Nontraditional Engagements (version 10/24) are editable Microsoft Word and Excel versions of all the practice aids in the Guide.

**Definition of QCM**

*PPC's Guide to Nontraditional Engagements* are quality control materials (QCM). The AICPA defines QCM as materials (for example, manuals or tools), including industry- or subject matter-specific materials, intended to enable the operation of a firm's system of quality control and promote consistency in performing quality engagements. QCM may be made available through technology, for example, through automated tools and techniques, and IT applications.

QCM address standards and interpretive guidance related to accounting; audit, attestation, review, compilation, or preparation engagements or other services that CPA firms may provide; or ethics, independence, quality control, quality management, peer review, or practice monitoring related to those services.

**Other QCM Providers**

The elements of the QCM provided and within this description are delivered by Thomson Reuters (Tax and Accounting) Inc. (Thomson Reuters) and no other QCM provider.

**Characteristics of the QCM**

The Guide is a full set of guidance and practice aids to perform the following types of engagements:

- Standard engagements under the AICPA attestation standards:
  - Assertion-based examinations of the subject matter or assertion (AT-C 205A)
  - Direct examinations of the subject matter (AT-C 206)
  - Reviews of the subject matter (AT-C 210A)
  - Applying agreed-upon procedures to subject matter (AT-C 215A)
- Attestation engagements to report on pro forma financial information:
  - Examinations of pro forma financial information (AT-C 310)
  - Reviews of pro forma financial information (AT-C 310)
- Attestation engagements to report on compliance:
  - Examinations of compliance with the requirements of specified laws, regulations, rules, contracts, or grants (specified requirements) or an assertion about compliance with specified requirements (AT-C 315)
  - Applying agreed-upon procedures to an entity's compliance with specified requirements (AT-C 315)
  - Applying agreed-upon procedures to an entity's internal control over compliance with specified requirements (AT-C 315)

**Description, as of October 25, 2024, of Thomson Reuters' *PPC's Guide to Nontraditional Engagements*, October 11, 2024, 31st Edition (Continued)**

- Attestation engagements specific to financial institutions:
  - Supervisory committee audits and director's examinations (AT-C 215A)
  - Applying agreed-upon procedures to and examinations of compliance with specified requirements in engagements relating to federal student loan programs under the U.S. Department of Education's *Guide for Compliance Attestation Engagements of Lenders Holding Federal Family Education Loan Program Loans* as of September 2020 (AT-C 315)

The Guide provides limited guidance and practice aids to perform the following engagements:

- Engagements in accordance with auditing standards generally accepted in the United States of America:
  - Audits of specific elements, accounts, or items of a financial statement (specified elements) (AU-C 805)
  - Reporting on compliance with contractual agreements in connection with an audit of the financial statements (AU-C 806)
  - Reporting on contractual basis financial statements (AU-C 800)
  - Reporting on incomplete presentations that are otherwise in accordance with the applicable framework (AU-C 805)
- Applying agreed-upon procedures to XBRL-formatted information under Statement of Position (SOP) 13-2, *Performing Agreed-Upon Procedures Engagements That Address the Completeness, Mapping, Consistency, or Structure of XBRL-Formatted Information* (AT-C 215A)
- Reporting on internal control (AT-C 205A):
  - Examination of internal control over compliance or an assertion about internal control over compliance
  - Examination of internal control over financial reporting or an assertion about internal control over financial reporting
  - Examination of the suitability of the design of internal control over financial reporting
- Preparation and compilation of pro forma financial information (AR-C 120)
- Reporting on compilations and reviews of contractual basis financial statements (AR-C 80A and AR-C 90A)
- Engagements under the AICPA consulting standard (CS 100):
  - Acquisition assistance engagements (ownership changes)
  - Business risk assessment services

The practice aids provide a means to document compliance with relevant standards and interpretive guidance and include illustrative practitioner's, auditor's, accountant's, and consultant's reports; engagement, management representation, and other illustrative letters; checklists; and engagement programs.

The Guide is intended to be used in conjunction with *PPC's Guide to Audits of Nonpublic Companies* and *PPC's Guide to Compilation and Review Engagements* when (1) performing audits of specified elements or (2) preparing or compiling pro forma financial information or compiling or reviewing contractual basis financial statements, respectively. The Guide does not provide comprehensive guidance on auditor's reports. Additionally, the Guide addresses engagement-level quality control requirements but does not address firm-level quality control system requirements. Consequently, the Guide is intended to be used in conjunction with *PPC's Guide to Auditor's Reports* and *PPC's Guide to Quality Control*.

**Relevant Standards and Interpretive Guidance Addressed by the Guide**

***Attestation Standards and Interpretive Guidance***

The Guide addresses relevant attestation standards and interpretive guidance issued and effective by the Auditing Standards Board (ASB) of the AICPA through October 11, 2024.

## **Description, as of October 25, 2024, of Thomson Reuters' PPC's Guide to Nontraditional Engagements, October 11, 2024, 31st Edition (Continued)**

The following attestation standard was issued before October 11, 2024, was not fully effective at the time of publication, and is not fully incorporated into the Guide:

- SSAE No. 23, *Amendments to the Attestation Standards for Consistency with the Issuance of AICPA Standards on Quality Management*, is effective for engagements beginning on or after December 15, 2025. This Guide provides an overview of the provisions of SSAE No. 23; however, the requirements have not been incorporated into the Guide. It is expected to be fully incorporated into a future edition of the Guide. SSAE No. 23 does not prohibit early implementation.

The Guide addresses the U.S. Department of Education's *Guide for Compliance Attestation Engagements of Lenders Holding Federal Family Education Loan Program Loans* as of September 2020.

The Guide addresses SOP 13-2, *Performing Agreed-Upon Procedures Engagements That Address the Completeness, Mapping, Consistency, or Structure of XBRL-Formatted Information*.

### **Auditing Standards and Interpretive Guidance**

The Guide addresses relevant auditing standards and interpretive guidance issued and effective by the ASB through October 11, 2024.

The following auditing standards were issued through October 11, 2024, were not fully effective at the time of publication, and are not fully incorporated into the Guide:

- SAS No. 146, *Quality Management for an Engagement Conducted in Accordance with Generally Accepted Auditing Standards*, is effective for engagements conducted in accordance with U.S. GAAS for periods beginning on or after December 15, 2025. The Guide provides an overview of SAS No. 146; however, the requirements of this standard have not been incorporated into this edition of the Guide. It is expected to be fully incorporated into a future edition of the Guide. SAS No. 146 does not prohibit early implementation.
- SAS No. 149, *Special Considerations—Audits of Group Financial Statements (Including the Work of Component Auditors and Audits of Referred-to Auditors)*, is effective for audits of group financial statements for periods ending on or after December 15, 2026. The Guide provides an overview of SAS No. 149; however, the requirements of this standard have not been incorporated into this edition of the Guide. It is expected to be fully incorporated into a future edition of the Guide. SAS No. 149 does not prohibit early implementation.

### **Preparation, Compilation, and Review Standards and Interpretive Guidance**

The Guide addresses relevant preparation, compilation, and review standards and interpretive guidance issued and effective by the Accounting and Review Services Committee (ARSC) of the AICPA through October 11, 2024.

The following preparation, compilation, and review standard was issued before October 11, 2024, was not fully effective at the time of publication, and is not fully incorporated into the Guide:

- Statement on Standards for Accounting and Review Services (SSARS) No. 26, *Quality Management for an Engagement Conducted in Accordance with Statements on Standards for Accounting and Review Services*, is effective for engagements performed in accordance with SSARSs for periods beginning on or after December 15, 2025, other than the amendment to AR-C 90.16, which was effective upon issuance. The amendment to AR-C 90.16 is beyond the scope of the Guide. The Guide provides an overview of the other provisions of SSARS No. 26; however, the other requirements have not been incorporated into this edition of the Guide. It is expected to be fully incorporated into a future edition of the Guide. SSARS No. 26 does not prohibit early implementation.

The Guide addresses the AICPA Guide, *Preparation, Compilation, and Review Engagements*, as of September 1, 2023.

### **Consulting Standards and Interpretive Guidance**

The Guide addresses relevant consulting standards and interpretive guidance issued and effective by the Management Consulting Services Executive Committee of the AICPA that were issued and effective through October 11, 2024.

**Description, as of October 25, 2024, of Thomson Reuters' *PPC's Guide to Nontraditional Engagements*, October 11, 2024, 31st Edition (Continued)**

***Other AICPA Professional Standards***

The Guide incorporates professional standards from the AICPA, beyond the auditing, attestation, compilation, and review standards, that are relevant to the Guide. These include standards relating to ethics from the AICPA *Code of Professional Conduct* in the context of their application to the Guide.

**Policy for Updating the QCM Content**

Thomson Reuters updates *PPC's Guide to Nontraditional Engagements* annually and generally releases a new edition each fall to reflect changes in standards and interpretive guidance, content enhancements, and the corrections of minor errors not previously updated. The Guide referenced herein was completed on October 11, 2024, and no changes have been made to this specific edition of the Guide since then.

**User Firm Responsibilities**

User firms are responsible for the following:

- a. Determining whether the QCM are suitable for the user firm's purposes
- b. Understanding that the QCM are not intended to be a substitute for the standards and interpretive guidance, an evaluation thereof, or professional judgment
- c. Using the most up-to-date QCM available that are applicable in the circumstances, including accessing and using the most recent and effective relevant standards and interpretive guidance that are not addressed or not fully addressed by the QCM
- d. Properly implementing the QCM and using professional judgment in the application of the QCM based on the facts and circumstances (for example, of each engagement)
- e. Providing the appropriate training for the use of the QCM and performing the appropriate supervision and review procedures regarding the use of the QCM based on the skill, training, knowledge, and experience of individual users within the user firm
- f. Identifying that there may be certain facts, circumstances, risk factors, or specific issues that exist for a particular client, engagement, or user firm that may not be addressed by the QCM; in that case, understanding that the QCM will require tailoring and augmentation to address such facts, circumstances, risk factors, or specific issues
- g. Monitoring the activities of standard-setting bodies for changes that would affect the user firm, including amendments of standards and interpretive guidance and deferrals of effective dates
- h. Complying with relevant professional standards and interpretive guidance
- i. Understanding that the effectiveness of the QCM is dependent on the user firm fulfilling the preceding responsibilities and the effectiveness of its actions