

February 16, 2023

Public Company Accounting Oversight Board
Office of the Secretary
1666 K Street, NW
Washington, DC 20006-2803

Re: **PCAOB Rulemaking Docket Matter No. 28**

To whom it may concern:

I'm writing to express my concerns regarding **PCAOB Rulemaking Docket Matter No. 28.**, The Auditors Use of Confirmation and Other Proposed Amendments to PCAOB Standards specifically related to the proposal and statements on **page 43 of the PCAOB Release No. 2022-009, dated December 20, 2022** which reads "....*Involving internal auditors or other company employees in these activities would create a risk that information exchanged between the auditor and the confirming party is intercepted and altered. Accordingly, under the new proposed standard, using direct assistance from internal auditors for these activities would not be allowed.*".

The mischaracterization of Internal Auditors working on behalf of external auditors would alter confirmations is offensive and conflicts with the long-standing relationship between the professions outlined in **PCAOB AS 2605. PCAOB AS 2605 allows external auditors to assess the specific internal auditor for their objectivity and competence and then decide whether or not to seek the assistance of the internal audit function.** The elimination of use of internal auditors in the confirmation processes removes the external auditors' professional judgement and vilifies the profession of Internal Auditors as a whole without consideration to our backgrounds, skillset, required independence from management, and reporting relationships to Boards/Audit Committees.

As internal audit professionals, we are required to comply with mandatory professional standards and a code of ethics. The language used by the PCOAB disparages Internal Auditors and thus I ask the PCOAB to examine closely this generalization and mischaracterization and its long-term impact on our collective professions working together.

Sincerely,



Karen Percent, MHA, CPA, CIA

As a member of the Board of Governors for the Florida West Coast Chapter of the Institute of Internal Auditors Association, other professional Internal Auditors also shared my concerns as follows:

Monica Moyer-Kessel

Monica Moyer-Kessel, MBA, CIA, CFE, CRMA, CCEP, CICA

Gary Jordan

Gary Jordan



Laura Tatem, CPA, CIA, CGAP, CRMA

Mark Nash

Mark Nash, CFE

Kristina Simmons

Kristina Simmons, CIA