

Form AP, Auditor Reporting of Certain Audit Participants

We are pleased to release our CAQ Alert No. 2016-03, Form AP, *Auditor Reporting of Certain Audit Participants* (“the CAQ Alert”) to assist our members with implementation of the reporting requirements of the Public Company Accounting Oversight Board (“PCAOB”) Rules 3210 and 3211, *Rules of the Board to Require Disclosure of Certain Participants in the Audit on Form AP*. The CAQ Alert can be a useful resource for our member firms and is intended to serve as a reminder of certain considerations related to the Form AP reporting requirements.

While the CAQ Alert highlights certain areas for consideration, it should not be relied upon by readers as being a definitive or all-inclusive resource; rather it should be read and considered in conjunction with the applicable PCAOB rules, standards, and related guidance in their entirety.

The CAQ Alert is organized in the following topical areas:

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 - ▶ Disclosure of Engagement Partner Name for Auditors’ Reports Issued on or after January 31, 2017
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Summary of Form AP Reporting Requirements

In May 2016, the Securities and Exchange Commission (“SEC”) approved the PCAOB [Rules 3210 and 3211](#), *Rules of the Board to Require Disclosure of Certain Participants in the Audit on Form AP*. The following select provisions related to Form AP, *Auditor Reporting of Certain Audit Participants* (“Form AP”) reporting requirements are provided to assist our member firms in their understanding of the relevant requirements of Form AP reporting. In addition, the following information could be used by member firms in communicating certain aspects of Form AP requirements to audit committees, tailored to the facts and circumstances of the audit engagement.

Form AP Reporting Applicability and Effective Dates

Applicability

- ▶ For each new or revised auditor’s report included in an issuer’s¹ filings with the SEC, a registered public accounting firm must file with the PCAOB a report on Form AP in accordance with the instructions to that form.
- ▶ The information reported on Form AP will be publicly available in a searchable database maintained on the PCAOB’s website.
- ▶ Form AP reporting is **NOT** required for audits of brokers and dealers performed pursuant to Rule 17a-5 under the Securities Exchange Act of 1934, as amended (“Exchange Act”).
 - ▶ However, if a broker or dealer is an issuer required to file audited financial statements under Section 13 or 15(d) of the Exchange Act, the Form AP reporting requirements would apply.

Effective Dates

The PCAOB elected a phased effective date, starting with the disclosure of the engagement partner name, followed by the disclosure of the extent of participation² by other accounting firm(s)³ a few months later. Specifically:

- ▶ The engagement partner name⁴ is required to be reported on Form AP filed for auditors’ reports issued on or after **January 31, 2017**.
- ▶ Information about participation of other accounting firm(s) is required to be reported on Form AP filed for auditors’ reports issued on or after **June 30, 2017**.

Due Date

Form AP is due by:

- ▶ **The 35th day** after the date the audit report is first included in a document filed with the SEC (for example, a Form 10-K); or
- ▶ **The 10th day** after the date the audit report is first included in a Securities Act of 1933 registration statement filed with the SEC (for example, a Form S-1).

¹ PCAOB Staff Guidance, *Form AP, Auditor Reporting of Certain Audit Participants and Related Voluntary Audit Report Disclosure Under AS 3101, Reports on Audited Financial Statements*, footnote 1 explains that “issuers, in general, are entities that are required to file periodic reports with the SEC under the Securities Exchange Act of 1934 (“Exchange Act”) or that file or have filed a registration statement that has not yet become effective under the Securities Act of 1933 (“Securities Act”), and that has not been withdrawn. See Rule 1001(i)(iii). In addition to companies that are required to file annual reports on Forms 10-K, 20-F, and 40-F, issuers include certain employee stock purchase, savings, and similar plans; unit investment trusts; and registered investment companies.” Further, PCAOB Rule 1001(i)(iii) states: “the term ‘issuer’ means an issuer (as defined in Section 3 of the Exchange Act), the securities of which are registered under Section 12 of that Act, or that is required to file reports under Section 15(d) of that Act, or that files or has filed a registration statement that has not yet become effective under the Securities Act of 1933, and that it has not withdrawn.”

² Note to Item 3.2 of Form AP states that “an other accounting firm participated in the Firm’s audit if (i) the Firm assumes responsibility for the work and report of the other accounting firm as described in paragraphs .03 - .05 of AS 1205, *Part of the Audit Performed by Other Independent Auditors*, or (ii) the other accounting firm or any of its principals or professional employees was subject to supervision under AS 1201, *Supervision of the Audit Engagement*.” General Instruction 2 of Form AP defines the term “the Firm” as “the registered public accounting firm that is filing this Form with the Board.”

³ General Instruction 2 of Form AP states that the term “other accounting firm” means “(i) a registered public accounting firm other than the Firm; or (ii) any other person or entity that opines on the compliance of any entity’s financial statements with an applicable financial reporting framework.”

⁴ The name of the engagement partner who is responsible for a firm’s issuance of an issuer audit report. [Auditing Standard \(AS\) 1201](#), *Supervision of the Audit Engagement* defines the term “engagement partner” as “the member of the engagement team with primary responsibility for the audit.”

Disclosure of Engagement Partner Name for Auditors' Reports Issued on or after January 31, 2017

Partner Name (Form AP, Part III, Item 3.1.a.6)

The required disclosures related to the engagement partner name on Form AP are:

- ▶ The name of the engagement partner on the most recent period's audit;
- ▶ The engagement partner's unique 10-digit Partner ID number; and
- ▶ Any other Partner IDs by which the engagement partner has been previously identified.⁵

Each firm is required to assign a unique 10-digit Partner ID number to all of its engagement partners who are responsible for issuer audits. This Partner ID number is required to be comprised of:

- ▶ The Firm's ID (the five-digit identifier assigned to the firm by the PCAOB at the time of registration), followed by
- ▶ A unique five-digit partner identifier created by the firm.

Disclosure of Extent of Other Firm(s') Participation for Auditors' Reports Issued on or after June 30, 2017

If an other accounting firm⁶ participated in an audit, information about the other accounting firm's participation is required to be reported on Form AP. The nature of the required disclosure depends on the extent of participation of the other accounting firm in the audit of the issuer.

Responsibility Is Not Divided – Extent of Participation (Form AP, Part IV)

- ▶ Many global accounting firms are structured as separate legal entities that operate as a global network. Any separate legal entity that meets the definition of an other accounting firm and that participates in the audit, individually contributing 5 percent or more of total audit hours, will have to be reported on Form AP. This includes all other accounting firms participating in an issuer audit even when they are part of the same global network.
- ▶ If one or more other accounting firm(s) participated in the firm's audit and the responsibility for the audit is not divided, the firm is required to report on Form AP the extent of participation of such firm(s) as follows:
 - ▶ Individually 5 percent or greater of total audit hours (Item 4.1): Legal name, Firm ID for firms that have a publicly available PCAOB-assigned number, city and state (or, if outside the United States, the city and country), and the **extent of participation**, expressed as a single number or within the appropriate range of the percentage of total audit hours, attributable to each other accounting firm.
 - ▶ Individually less than 5 percent of total audit hours (Item 4.2): The **number** of other accounting firm(s) that participated in the audit, and the **aggregate extent of participation** of such firms, expressed as a single number or within the appropriate range of the percentage of total audit hours. The name(s) of such firm(s) does not have to be disclosed.
- ▶ Excluded from required reporting on Form AP:⁷ An accounting firm performing the audit of entities in which the issuer has an investment that is accounted for using the equity method.⁸

⁵ See Question 10 below for more information.

⁶ See note 3 above.

⁷ For a complete list of exclusions see Instructions to Part IV of Form AP, and PCAOB Staff Guidance, Section III.B.

⁸ See Financial Accounting Standards Board ("FASB") Accounting Standards Codification ("ASC") Topic 323, *Investments—Equity Method and Joint Ventures*.

Divided Responsibility (Form AP, Part V)

If the responsibility for the audit is divided with one or more public accounting firm(s),⁹ the firm filing Form AP is required to report:

- ▶ The legal name of the other firm with whom responsibility is divided;
- ▶ Its Firm ID, when applicable;
- ▶ City and state (or, if outside the United States, the city and country) of the office that issued the other audit report; and
- ▶ The magnitude¹⁰ of the portion of the financial statements audited by the other firm.

Frequently Asked Questions

FORM AP REPORTING REQUIREMENTS HIGHLIGHTS

PCAOB Resources

1. What resources are available to help understand Form AP reporting requirements?

A: In addition to Rule 3210 and Rule 3211, firms should refer to [Form AP General Instructions](#) and [Sample Form AP](#).

To help accounting firms implement the new rules, in June 2016 the PCAOB issued Staff Guidance on Form AP, *Auditor Reporting of Certain Audit Participants and Related Voluntary Audit Report Disclosure under AS 3101, Reports on Audited Financial Statements* (“[PCAOB Staff Guidance](#)”). The PCAOB also launched [a web resource page](#) on Form AP for investors, auditors, and others interested in information about the new rules. We encourage our members to review these useful resources in preparation for their reporting on Form AP in 2017. The PCAOB web resource page also provides contact information for inquiries related to Form AP and related rules, and/or the PCAOB web-based system.

Filing Requirements

2. Should the firm file a Form AP each time the audit report is included in a document filed with the SEC?

A: PCAOB Staff Guidance, Section I.A.2 explains that “Rule 3211 requires the filing of a report on Form AP regarding an audit report only the first time the audit report is included in a document filed with the SEC. Subsequent inclusion of precisely the same audit report in other documents filed with the SEC does not give rise to a requirement to file another Form AP.

In the event of any change to the audit report, including any change to the audit report date, Rule 3211 requires the filing of a new Form AP the first time the revised audit report is included in a document filed with the SEC.”¹¹

3. Is a new Form AP required when filing a consent in connection with a Form S-3 filing?

A: PCAOB Staff Guidance, Section I.A.2 provides that “if the firm issues an audit report that is included in an issuer’s Form 10-K filing and the firm subsequently consents to inclusion of that same audit report in the issuer’s Form S-3 filing, the firm is not required to file a new Form AP in connection with the Form S-3 filing.”

4. Is a new Form AP required if the original audit report is reissued and dual-dated?

A: PCAOB Staff Guidance, Section I.A.2 provides that “if a previously-issued audit report is reissued and dual-dated to refer to the addition of a subsequent events note in the financial statements, a new Form AP would be required stating the original date of the audit report and the date of the dual-dated content.” If the audit report is reissued and dual-dated after

⁹ An audit report of a registered public accounting firm that is referred to by the principal auditor in accordance with AS 1205, *Part of the Audit Performed by Other Independent Auditors*. See Note to Item 5.1 of the Form AP.

¹⁰ See Note to Item 5.1 of the Form AP.

¹¹ See Note 2 to Rule 3211(a).

June 30, 2017, the information about other accounting firm(s) participating in an audit would also need to be reported, if applicable, in accordance with Item IV of Form AP.¹²

5. Can the firm report multiple audit opinions issued for mutual funds with more than one series for the same issuer on one Form AP?

A: PCAOB Staff Guidance, Section I.A.2 provides that “when multiple audit opinions are issued on the same day for a mutual fund with more than one series (either within a single audit report or in multiple audit reports), the firm may file a single Form AP covering all of the audit opinions, so long as all of the information elicited by Form AP is identical for each series except for the Series identifier.¹³ If, however, any of the information called for on Form AP varies among any of the series of the mutual fund, Rule 3211 requires a separate Form AP filing for any series with differing Form AP information.”

6. Which engagements, conducted in accordance with the PCAOB standards, do not require filing of Form AP?

A: PCAOB Staff Guidance, Section I.A.2 provides that filing of a Form AP is not required for:

- ▶ Attestation engagements, for example, compliance with servicing criteria pursuant to Exchange Act Rules 13a-18 and 15d-18—Regulation AB;
- ▶ Reports issued for interim reviews; and
- ▶ As mentioned in the summary above, non-issuer audits conducted in accordance with PCAOB standards, including audits of brokers and dealers reporting under Exchange Act Rule 17a-5. However, if a broker or dealer were an issuer, Form AP filing would be required.

Amendments to Form AP

Amendments to Form AP are required to correct information that was, at the time of initial filing of Form AP, incorrect or inappropriately omitted from the original Form AP. When filing a Form AP to amend a previously filed Form AP, the firm must supply not only the corrected or supplemental information, but it must also include in the amended Form AP all information and certifications that were required to be included in the original Form AP. The firm may access the originally filed Form AP through the PCAOB’s Web-based system and make the appropriate amendments without needing to re-enter all other information.¹⁴

7. Should the firm amend the previously filed Form AP if estimated audit hours used in the calculation of the extent of participation of an other accounting firm(s) are different from actual audit hours?

A: PCAOB Staff Guidance, Section I.B.2 provides that “if actual hours are unavailable, the firm may use a reasonable method to estimate audit hours. No amendment to Form AP is needed solely to reflect changes in the identification of firms or their percentage participation in the audit that would result from differences between reasonably estimated hours and actual hours, in the event such information becomes available after the Form AP filing deadline.”

8. What are other situations when an amendment to Form AP is not necessary?

A: The PCAOB Staff Guidance, Section I.B.2 provides that the amendment process should not be used to update previously filed Form AP for:

- ▶ Engagement partner changes - “If after an audit report is issued, another engagement partner is assigned to the issuer’s audit,” or
- ▶ Withdrawn audit reports - “To update a previously filed Form AP in connection with an audit report that is subsequently withdrawn.”

12 See PCAOB Staff Guidance, Section VII.

13 The Series identifier for each series must be indicated in Item 3.1.a.2 of Form AP.

14 General Instruction 4 of Form AP.

ENGAGEMENT PARTNER DISCLOSURE ON FORM AP

Engagement Partner Name

9. How should the firm report the name of the engagement partner on Form AP?

A: Instructions to Item 3.1.a.6 of Form AP, requires the firm to provide “the first and last name, all middle names and suffix, if any, of the engagement partner on the most recent period’s audit.”

The PCAOB Staff Guidance, Section II.A also provides that “the engagement partner’s name is required to be reported consistently on all Form APs filed with the PCAOB, unless the individual has changed his or her name.” If a partner changes his or her name, “all Form APs filed subsequent to a name change are required to consistently use the new name.”

Partner ID

Each registered accounting firm is required to assign a Partner ID to each of its partners serving as the engagement partner on audits of issuers. The PCAOB “believes that the ability to unambiguously identify each engagement partner with his or her issuer audit history may improve the usability of the data gathered on Form AP and the overall cost of implementation should be low.”¹⁵

A unique Partner ID is required to be assigned to each audit partner of a registered public accounting firm for purposes of Form AP reporting.¹⁶

10. How is the Partner ID impacted if a partner resigns and joins a new public accounting firm?

A: When an engagement partner is no longer associated with a firm, his/her Partner ID must be retired by that firm and cannot be reassigned to another engagement partner. When an engagement partner joins a new firm, if that engagement partner was previously associated with a different registered public accounting firm and had a Partner ID at that previous firm, the new firm must assign a new Partner ID to the engagement partner. All future Form APs associated with the engagement partner must report, in Item 3.1.a.6 of Form AP, the new Partner ID and all Partner IDs previously associated with the engagement partner.¹⁷

Dual-Dated Audit Reports

11. How does the firm report a change in the engagement audit partner after a firm reissues and dual-dates its previously issued report?

A: PCAOB Staff Guidance, Section II.C provides that “if the engagement partner has changed after the original audit report is issued, Form AP will disclose both the name of the engagement partner who was responsible for the original audit report and the name of the engagement partner responsible for the dual-dated content.”¹⁸

OTHER ACCOUNTING FIRM DISCLOSURE ON FORM AP

General Requirements

PCAOB Staff Guidance, Section III.C.1 provides, that “in general, total audit hours will be comprised of the hours of the principal auditor, other accounting firms participating in the audit with whom the principal auditor does not divide responsibility for the audit, and nonaccounting firm participants that assist the principal auditor or other accounting firms.” Total audit hours exclude hours incurred by certain audit participants. We encourage our member firms to review an illustrative example of a calculation of total audit hours included in PCAOB Staff Guidance, Section V.B.

¹⁵ See PCAOB Release No. 2015-008, Section III.2.

¹⁶ See General Instruction 7 of Form AP.

¹⁷ Ibid.

¹⁸ See Items 3.1.a.6 and 3.1.e of Form AP.

Exclusions from Disclosure and the Computation of Total Audit Hours

12. Which audit participants and related hours are *excluded* from Form AP disclosure requirements and computation of total audit hours?

- A:** As stated in the Instruction to Part IV of Form AP, excluded from disclosure and from total audit hours in the most recent period's audit are, respectively, the identity and hours incurred by:
- ▶ the engagement quality reviewer;
 - ▶ the person who performed the review pursuant to [SEC Practice Section 1000.45 Appendix K SECPS Member Firms With Foreign Associated Firms That Audit SEC Registrants](#),¹⁹
 - ▶ specialists engaged, not employed, by the firm;
 - ▶ an accounting firm performing the audit of entities in which the issuer has an investment that is accounted for using the equity method;²⁰
 - ▶ internal auditors, other company personnel, or third parties working under the direction of management or the audit committee who provided direct assistance in the audit of internal control over financial reporting; and
 - ▶ internal auditors who provided direct assistance in the audit of the financial statements.

Computation of Total Audit Hours and Using Estimated Audit Hours

13. If an other accounting firm(s) participated in an audit, which firm is responsible for computing the extent of participation of such firm(s)?

- A:** PCAOB Staff Guidance, Section III.C provides that “if an other accounting firm(s) participated in the audit, the firm filing Form AP is required to compute the extent of participation of each other accounting firm in the most recent period's audit as a percentage of total audit hours.”

14. What is *included* in the calculation of total audit hours?

- A:** For purposes of determining the extent of other accounting firm(s') participation, the firm issuing the audit report will calculate the total audit hours incurred in the most recent period's audit. For purposes of this calculation, total audit hours should be comprised of hours attributable to:
- ▶ the financial statement audit;
 - ▶ reviews pursuant to [AS 4105](#), *Reviews of Interim Financial Information* for the fiscal year covered by the audit; and
 - ▶ the audit of internal control over financial reporting pursuant to [AS 2201](#), *An Audit of Internal Control Over Financial Reporting That Is Integrated with An Audit of Financial Statements*.²¹

PCAOB Staff Guidance, Section III.C.1 provides that “nonaccounting firms are not identified on Form AP. However, the hours incurred by nonaccounting firm participants in the audit should be included in the computation of total audit hours and allocated among the principal auditor and the other accounting firms participating in the audit on the basis of which accounting firm commissioned and directed the applicable work of the nonaccounting firm.”

15. How does the firm determine who is a nonaccounting firm participant?

- A:** PCAOB Staff Guidance, Section III.C.1 provides that “nonaccounting firms are entities that participate in the audit that do not meet the definition of “other accounting firm” for purposes of Form AP. Offshore service centers, tax consulting firms, or other types of entities may be nonaccounting firms if they do not meet the definition of “other accounting firm”.²²

19 Such reviews are limited to registration statements, annual reports on Form 20-F and 10-K, and other SEC filings that include or incorporate the foreign associated firm's audit report on the financial statements of an SEC registrant.

20 See PCAOB Staff Guidance, Section III.C.1, *Hours related to the audit of an equity method investee*.

21 See Instructions to Part IV of Form AP.

22 See PCAOB Staff Guidance, Section III.C.1 *Example – Shared Service Center*, which illustrates allocation of audit hours.

16. If the same accounting firm performed or participated in the audit of the issuer and its equity method investee, what audit hours should be included in the computation of total audit hours?

A: PCAOB Staff Guidance, Section III.C.1 provides that if the “same accounting firm performed or participated in the audit of the issuer and its equity method investee, the hours incurred for the portion of its work not related to the audit of the equity method investee would be included in total audit hours. Hours incurred by the principal auditor to audit the issuer’s application of the equity method are also included in total audit hours.”

Instructions to Part IV of Form AP provide that actual audit hours should be used if available. If actual audit hours are unavailable, the firm may use a reasonable method to estimate the components of this calculation.

17. What are the documentation requirements regarding audit hours?

A: The firm should document in its files the method used to estimate hours when actual audit hours are unavailable and the computation of total audit hours on a basis consistent with [AS 1215](#), *Audit Documentation* (“AS 1215”). Under AS 1215, the documentation should be in sufficient detail to enable an experienced auditor, having no previous connection with the engagement, to understand the computation of total audit hours and the method used to estimate hours when actual hours were unavailable.²³

Other accounting firms that participate in audits of multinational issuers often perform local statutory audits of subsidiaries in addition to participating in the issuer’s audit.

18. How does the firm allocate audit hours to the financial statement audit of a subsidiary if a statutory audit was also performed?

A: PCAOB Staff Guidance, Section III.C.2.a provides that “the materiality threshold and legal requirements for the statutory audit may necessitate a different level of work than would have been required for the issuer’s audit. In these cases, it may be difficult for the auditor to determine how much work performed at the subsidiary relates solely to the participation in the issuer’s audit. If actual hours are unavailable, a reasonable method to estimate may be used.”

PCAOB Staff Guidance, Section III.C.2.a provides “the firm filing Form AP can develop reasonable methods that its engagement teams may use when estimating audit hours. Reasonable methods could include, among others:

- ▶ Using 100 percent of actual hours incurred by other accounting firms during the issuer’s audit, without separating hours incurred for the statutory audit; or
- ▶ Estimating the hours incurred by other accounting firms to perform work necessary for the issuer’s audit, based on the audit procedures required for the issuer’s audit in relation to all procedures performed.”

19. How are the audit hours computed for audits where multiple periods presented in the financial statements are audited during a single audit engagement?

A: PCAOB Staff Guidance, Section III.C.3 provides, that “in these situations, total audit hours and hours of other accounting firms are calculated for the single audit engagement. The firm would not separate the hours related to the current year’s audit from the hours related to audits of prior periods if they were incurred in the same audit engagement, even if the information were available.”²⁴

²³ See Instructions to Part IV of Form AP.

²⁴ The requirement to use the aggregate hours for multiple periods audited during a single audit engagement for purposes of responding to Part IV of Form AP should not be understood to mean that these periods should be considered one audit for purposes of the auditor independence requirements under U.S. federal securities laws and the rules and regulations of the SEC and the PCAOB, for example the requirements for audit partner rotation in Rule 2-01(c)(6) of Regulation S-X.

20. How is the computation of audit hours impacted if an audit report is reissued or dual-dated?

A: PCAOB Staff Guidance, Section III.C.4 provides that “in these situations, total audit hours and hours of other accounting firms are computed through the latest audit report date. For example, if a previously-issued audit report is reissued and dual-dated to refer to the addition of a subsequent events note in the financial statements, the firm filing Form AP would recalculate total audit hours and the extent of participation of the other accounting firms as of the latest audit report date based on the cumulative audit hours for the periods identified on Form AP.”

Other Accounting Firms Individually Contributing 5 Percent or More of Total Audit Hours

21. Where can the firm obtain the PCAOB registered firm ID?

A: Note to General Instruction 7 of Form AP provides that “the Firm ID can be found by viewing the firm’s summary page [on the PCAOB website](#), where it is displayed parenthetically next to the name of the firm—firm name (XXXXX). For firms that have PCAOB-assigned identifiers with fewer than 5 digits, leading zeroes should be added before the number to make 5 digits, e.g., 99 should be presented as 00099.” When an other accounting firm does not have a publicly available Firm ID, the firm filing Form AP indicates this by checking a box in Item 4.1 of Form AP.²⁵

PCAOB Staff Guidance, Section III.D.3 provides that “the Firm ID becomes publicly available when registration with the PCAOB is approved by the Board. The Firm ID remains publicly available (and must be reported) thereafter, even if the firm’s PCAOB registration is later withdrawn or revoked.”

Responsibility for the Audit Is Divided

22. When a principal auditor divides responsibility for the audit with one or more other public accounting firms (referred-to auditor), how should the firm report the magnitude of the portion of the financial statements audited by the other public accounting firm under Item 5.1.a.3 of Form AP?

A: The magnitude disclosed on Form AP should be the same as the magnitude required to be disclosed in the audit report under applicable PCAOB standards. Under Item 5.1.a.3 of Form AP, the firm should state the dollar amounts or percentages of one or more of the following: total assets, total revenues, or other appropriate criteria, as it is described in the *audit report* in accordance with AS 1205.07.²⁶ In disclosing the magnitude of the portion of the financial statements audited by the other public accounting firm, Form AP requires disclosure of only one measure.

REPORTING THROUGH THE PCAOB SYSTEM

Filing Form AP

23. How does the firm obtain a username and a password for purposes of filing Form AP?

A: PCAOB Staff Guidance, Section VI.A provides that “firms must file Form AP through the PCAOB’s existing web-based system using the username and password they were issued in connection with the registration process. Since Form AP, like other PCAOB reporting forms, is filed by the accounting firm, usernames and passwords will not be issued for individual engagement partners to log into the system and submit the form.”

24. When is the Form AP deemed to be filed?

A: Form AP is deemed to be filed on the date that the firm submits a Form AP in the web-based system in accordance with Rule 3211 that includes the certification in Part VI of that form.²⁷

²⁵ See PCAOB Staff Guidance, Section III.D.3.

²⁶ See PCAOB Staff Guidance, Section III.F.

²⁷ For more information, see PCAOB Staff Guidance, VI.

25. What if the filing deadline falls on a Saturday, Sunday or federal legal holiday?

A: Pursuant to [Rule 1002](#), *Time Computation*, if the filing deadline falls on a Saturday, Sunday, or federal legal holiday, the deadline for filing would be the next day that is not a Saturday, Sunday, or federal legal holiday.

26. What methods of filing Form AP are available?

A: To complete Form AP, the firm may fill it out online as a web form or submit it using XML, which is a computer language. When submitting Form AP using a web form, the firm must complete one Form AP for each issuer audit report issued.

If the firm has multiple Form APs to file simultaneously, the firm may submit it using XML. In this instance, the firm would be able to load the data for multiple Form APs into an XML file directly or indirectly from other databases. If the firm would like to make its submission in XML, it must download the XML Schema from the [PCAOB's website](#). Using XML will likely require the assistance of a programmer who is versed in that computer language.²⁸

27. Is a manual signature required on Form AP?

A: PCAOB Staff Guidance, Section VI.A.3 provides that the firm “is required to certify and electronically sign all Form AP submissions, by typing the name of the authorized signer in the signature block (either on the web form or when using XML). A manual signature is not required to be retained for Form AP submissions.”

28 See PCAOB Staff Guidance, Section VI.A.1-2.