

Independent Accountant's Report

To Management
Thomson Reuters (Tax and Accounting) Inc.

We have examined:

- *PPC's Guide to HUD Audits*, September 2023, 30th Edition, available in print and online at Checkpoint.RIAG.com (the "quality control materials" or QCM)
- The accompanying description, "Description, as of February 8, 2024, of the Content of *PPC's Guide to HUD Audits*, September 2023, 30th Edition" (the "Description")

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

June 11, 2024

Attachment A: QCM Content Criteria and 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.

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 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 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 addresses 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 February 8, 2024, of the Content of PPC's Guide to HUD Audits, September 2023, 30th Edition

PPC's *Guide to HUD Audits*, September 2023, 30th 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 auditor's reports, audit programs, checklists, and confirmation 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, include PPC's Practice Aids, Checkpoint Engage, and PPC's SMART Practice Aids.

- PPC's Practice Aids: HUD Audits (version 9/23) are editable Microsoft Word and Excel versions of all practice aids in the Guide and may be used alone or through Checkpoint Engage or PPC's SMART Practice Aids.
- Checkpoint Engage is a fully integrated online audit solution that provides enhanced technological functionality of the content and engagement methodology in the Guide, while PPC's SMART Practice Aids is a desktop application that provides similar functionality.

Definition of QCM

PPC's *Guide to HUD Audits* is quality control materials (QCM). The American Institute of Certified Public Accountants (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 provides the following:

- A full set of guidance and practice aids to perform an audit of the financial statements of HUD-assisted multifamily entities in accordance with auditing standards generally accepted in the United States of America (U.S. GAAS). Those entities participate in one or more multifamily housing programs administered by HUD and may be organized as either for-profit or nonprofit entities.
- Guidance and practice aids to perform an audit under the additional standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States (commonly referred to as a Yellow Book audit).

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- Limited guidance and practice aids to perform:
 - The compliance portion of an audit in accordance with Chapter 3 of the *Consolidated Audit Guide for Audits of HUD Programs* (applies to for-profit entities) or the compliance portion of a single audit (the additional procedures required by Title 2 U.S. Code of Federal Regulations Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*) (applies to nonprofit entities). The Guide is not intended to be used for program-specific audits other than assisting with compliance testing of selected multifamily housing programs administered by HUD.
 - An attestation engagement applying agreed-upon procedures related to the electronic submission of project owner financial data.
 - A cost-certification audit of HUD-assisted multifamily developments.
 - A compliance audit of FHA-approved lenders.

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

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 Quality Control*.

For single audits, the Guide does not include certain practice aids with guidance based on the Office of Management and Budget (OMB) *Compliance Supplement*. Thus, the Guide is intended to be used in conjunction with *PPC’s Government Documents Library* (the “Library”) and the applicable OMB *Compliance Supplement*. The Library provides the most recent government documents, as well as other practice aids, which reflect the most recent edition of the OMB *Compliance Supplement*. The Library is intended to be used in conjunction with the Guide by auditors performing single audits and is updated as necessary to keep the documents current.

Relevant Standards and Interpretive Guidance Addressed by the Guide

Auditing Standards and Interpretive Guidance

The Guide addresses relevant auditing standards and interpretive guidance issued and effective by the Auditing Standards Board (ASB) of the AICPA through September 2023.

Although not fully effective at the time of publication, the following auditing standards were issued through September 2023 and are fully incorporated into the Guide, with extant guidance replaced:

- Statement on Auditing Standards (SAS) No. 143, *Auditing Accounting Estimates and Related Disclosures*; SAS No. 144, *Amendments to AU-C Sections 501, 540, and 620 Related to the Use of Specialists and the Use of Pricing Information Obtained from External Information Sources*; and SAS No. 145, *Understanding the Entity and Its Environment and Assessing the Risks of Material Misstatement*, are effective for audits of financial statements for periods ending on or after December 15, 2023 and do not prohibit early implementation.
- SAS No. 147, *Inquiries of the Predecessor Auditor Regarding Fraud and Noncompliance with Laws and Regulations*, is effective for audits of financial statements for periods beginning on or after June 30, 2023 and does not prohibit early implementation.

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- SAS No. 148, *Amendment to AU-C Section 935*, is effective for compliance audits for periods ending on or after December 15, 2023, other than the amendments to AU-C 501, which were effective for compliance audits for periods ending on or after December 15, 2022, with early implementation permitted.

The following auditing standards were also issued through September 2023, 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.

The Guide addresses the following standards, regulations, and interpretive guidance related to Yellow Book audits (for-profit entities and nonprofit entities), single audits (nonprofit entities), and HUD audit guide Chapter 3 audits (for-profit entities) issued through September 2023:

- *Government Auditing Standards, 2018 Revision Technical Update April 2021*
- AICPA Audit Guide, *Government Auditing Standards and Single Audits*, as of April 1, 2022
- *Consolidated Audit Guide for Audits of HUD Programs* (HUD audit guide, HUD Handbook 2000.4 REV-2), issued in December 2001 and revisions released by HUD through September 2023
- Single Audit Act Amendments of 1996
- OMB's *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance) [2 CFR part 200 of the Electronic Code of Federal Regulations (eCFR)]
- 2023 OMB *Compliance Supplement*

Attestation Standards and Interpretive Guidance

The Guide addresses attestation standards and interpretive guidance, relevant to agreed-upon procedures engagements, issued and effective by the Auditing Standards Board (ASB) of the AICPA through October 2023 and up to Statement on Standards for Attestation Engagements (SSAE) No. 22, *Review Engagements*. SSAE No. 22 is not applicable to the Guide.

Accounting Standards

The primary focus of the Guide is on engagement standards rather than accounting standards; however, it does provide relevant industry accounting guidance. In addition, accounting standards with disclosure requirements are included in the Disclosure Checklists (HUD-CX-13.1 and 13.2).

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The Guide addresses relevant accounting standards issued and effective by the Financial Accounting Standards Board (FASB) through September 2023, and up to FASB Accounting Standards Update (ASU) No. 2023-05, *Business Combinations - Joint Venture Formations (Subtopic 805-60): Recognition and Initial Measurement*.

Although not fully effective at the time of publication, the following relevant accounting standards were issued through September 2023, and dual guidance is provided, except as noted:

- ASU No. 2020-06, *Debt - Debt with Conversion and Other Options (Subtopic 470-20) and Derivatives and Hedging - Contracts in Entity's Own Equity (Subtopic 815-40): Accounting for Convertible Instruments and Contracts in an Entity's Own Equity*, is effective for fiscal years beginning after December 15, 2023, including interim periods within those years. Early adoption is permitted.
- ASU No. 2021-08, *Business Combinations (Topic 805): Accounting for Contract Assets and Contract Liabilities from Contracts with Customers*, is effective for fiscal years beginning after December 15, 2023, including interim periods within those years. Early adoption is permitted.
- ASU No. 2022-01, *Derivatives and Hedging (Topic 815): Fair Value Hedging - Portfolio Layer Method*, is effective for fiscal years beginning after December 15, 2023, including interim periods within those years. Early adoption is permitted.
- ASU No. 2022-03, *Fair Value Measurement (Topic 820): Fair Value Measurement of Equity Securities Subject to Contractual Sale Restrictions*, is effective for fiscal years beginning after December 15, 2024, including interim periods within those years. Early adoption is permitted for financial statements that have not been made available for issuance.
- ASU No. 2022-04, *Liabilities - Supplier Finance Programs (Subtopic 405-50): Disclosure of Supplier Finance Program Obligations*, is effective for fiscal years beginning after December 15, 2022, including interim periods within those years, except for the amendment on rollforward information, which is effective for fiscal years beginning after December 15, 2023.
- ASU No. 2023-01, *Leases (Topic 842): Common Control Arrangements*, is effective for fiscal years beginning after December 15, 2023, including interim periods within those years. Early adoption is permitted for financial statements that have not been made available for issuance.
- ASU No. 2023-02, *Investments - Equity Method and Joint Ventures (Topic 323): Accounting for Investments in Tax Credit Structures Using the Proportional Amortization Method*, is effective for fiscal years beginning after December 15, 2024, including interim periods within those years. Early adoption is permitted.
- ASU No. 2023-05, *Business Combinations - Joint Venture Formations (Subtopic 805-60): Recognition and Initial Measurement*, is effective prospectively for all joint venture formations with a formation date on or after January 1, 2025. Early adoption is permitted for financial statements that have not been made available for issuance. The Disclosure Checklists have not been updated with the corresponding disclosure requirements.

Policy for Updating the QCM Content

Thomson Reuters updates *PPC's Guide to HUD Audits* 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 in September 2023, and no changes have been made to this specific edition of the Guide since then.

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September 2023, 30th Edition
(Continued)**

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