

understanding of the facts may not be accomplished solely through oral and/or anonymous communications. While the staff does accept oral inquiries, these inquiries generally involve broader, emerging issues that are not company or fact specific. As such, responses to no-name or telephone inquiries cannot be relied upon as positions of the staff.

If a company chooses not to consult on an accounting issue with OCA, the company may nevertheless encounter OCA during a review of their filing by the Division of Corporation Finance (DCF) or Investment Management (IM). The accountants in DCF and IM, not those in OCA, perform the reviews of the financial reporting and disclosure information contained in documents submitted to the SEC. The accounting staff in DCF or IM may have questions regarding technical accounting and disclosure matters discussed in a document and they will often consult initially with the Office of Chief Accountant within the Division of Corporation Finance (DCF-OCA) or the separate Chief Accountant's Office within the Division of Investment Management (IM-CAO) and then with OCA as to the answer. As such, OCA serves in a consulting role similar to the role of advisor or national office of an accounting firm.

Another way that an issue may find its way to OCA is if a company asks OCA to review an accounting decision made by DCF or IM. A company would initiate such a review by OCA by informing DCF or IM of its intention to request such a review. In cases of OCA reviews, companies do not need to make a submission directly to OCA in accordance with this guidance if all of the relevant information is contained in the comment letter responses from the company to DCF or IM, although a separate submission to OCA may serve to expedite the process.

Notices Required Under Section 10A-1 of the Exchange Act

Pursuant to Section 10A(b) of the Exchange Act, an issuer or its registered public accounting firm may be required to notify the Commission regarding illegal acts.

Rule 10A-1(a)(1) indicates that notices required under Section 10A(b)(3) of the Exchange Act may be provided via “facsimile, telegraph, personal delivery, or any other means, provided it is received by the Office of the Chief Accountant within the required time period.”

The staff believes that, generally, the most timely receipt and attention to correspondence is facilitated through the use of electronic mail and prefers that notices to the Office of the Chief Accountant required by Rule 10A-1 be submitted via this means. Notices that must be submitted to the Office of the Chief Accountant pursuant to Rule 10A-1 should be submitted to: 10Aletters@sec.gov.

Notification of Resignations and Dismissals From Audit Engagements for Registrants

A new standard, AS 1310, Notification of Termination of the Auditor-Issuer Relationship, has been adopted by the PCAOB and approved by the U.S. Securities and Exchange Commission. The new standard will replace Section 1000.08(m) of the SEC Practice Section (SECPS) (as adopted by the PCAOB under Rule 3400T, Interim Quality Control Standards), in its entirety and will be effective on December 15, 2025.

See *PCAOB Release No. 2024-005* (https://assets.pcaobus.org/pcaob-dev/docs/default-source/rulemaking/docket046/2024-005-qc1000.pdf?sfvrsn=355bf24_2), *SEC Release No. 34-100968* (https://assets.pcaobus.org/pcaob-dev/docs/default-source/rulemaking/docket046/34-100968.pdf?sfvrsn=6c0ced5c_2).

Section 1000.08(m) of the SEC Practice Section (SECPS) (as adopted by the PCAOB under Rule 3400T, Interim Quality Control Standards) requires a firm to notify OCA of the cessation of an auditor's relationship with an audit client under certain circumstances.

Registrants Required to File Current Reports on Form 8-K

When the cessation of the auditor-client relationship relates to a registrant that is required to file current reports on Form 8-K, the firm is only required to notify OCA if the former audit client has not reported the change in auditor in a timely filed Form 8-K.

See Release No. 34-72087 (May 2, 2014), approving amendments to certain of the PCAOB's rules including an amendment to Section 1000.08(m) of the SEC Practice Section.

Registrants not Required to File Current Reports on Form 8-K