

Date: 6/26/26

*Virtual Meeting*

**NAIC/AMERICAN INSTITUTE OF CERTIFIED PUBLIC ACCOUNTANTS (E) WORKING GROUP**

July 16, 2026

11:00 a.m. – 12:00 p.m. ET / 10:00 – 11:00 a.m. CT / 9:00 – 10:00 a.m. MT / 8:00 a.m. – 9:00 a.m. PT

**ROLL CALL**

Doug Stolte, Chair	Virginia	Andrea Johnson	Nebraska
Diana Sherman, Vice Chair	Pennsylvania	Ned Cataldo	New Hampshire
Laura Clements	California	David Cook/Mark Boston	Ohio
Rylynn Brown	Delaware	Ryan Keeling	Oregon
Kevin Clark	Iowa	Johanna Nickelson	South Dakota
Kristin Hynes	Michigan	Jake Garn	Utah
Shannon Schmoeger	Missouri		

NAIC Support Staff: Bruce Jenson

**AGENDA**

1. Annual Review of Model Audit Rule Premium Threshold—*Doug Stolte (VA)* Attachment One
2. Discuss AICPA Definition of Public Interest Entities—*Doug Stolte (VA)* Attachment Two
3. Any Other Matters—*Doug Stolte (VA)*
4. Adjournment

[https://naiconline.sharepoint.com/teams/FRSSolvencyMonitoring/NAICAICPA WG/2026/7-16-26 NAIC-AICPA WG Agenda.docx](https://naiconline.sharepoint.com/teams/FRSSolvencyMonitoring/NAICAICPA%20WG/2026/7-16-26%20NAIC-AICPA%20WG%20Agenda.docx)

## Model Audit Rule Premium Threshold Review

2025 Annual - Property, Life, Health, Fraternal, & Title				
	# of Co.	Direct Premium (\$ Millions)	# of Co.	Gross Premium (\$ Millions)
Companies in Public Groups	1,422	\$ 1,907,582	1,422	\$ 3,076,255
Non-Public Co. with >\$500 Million DWP/GWP	508	\$ 1,489,257	721	\$ 2,527,749
<b>Total</b>	<b>1,930</b>	<b>\$ 3,396,839</b>	<b>2,143</b>	<b>\$ 5,604,004</b>
Total All Insurers	4,630	\$ 3,603,286	4,630	\$5,830,214
% of Total All Insurers	41.7%	94.3%	46.3%	96.1%

2024 Annual - Property, Life, Health, Fraternal, & Title				
	# of Co.	Direct Premium (\$ Millions)	# of Co.	Gross Premium (\$ Millions)
Companies in Public Groups	1,422	\$ 1,770,791	1,422	\$ 2,394,739
Non-Public Co. with >\$500 Million DWP/GWP	487	\$ 1,378,860	575	\$ 1,815,833
<b>Total</b>	<b>1,909</b>	<b>\$ 3,149,651</b>	<b>1,997</b>	<b>\$4,210,572</b>
Total All Insurers	4,630	\$ 3,353,736	4,630	\$4,421,393
% of Total All Insurers	41.2%	93.9%	43.1%	95.2%

2023 Annual - Property, Life, Health, Fraternal, & Title				
	# of Co.	Direct Premium (\$ Millions)	# of Co.	Gross Premium (\$ Millions)
Companies in Public Groups	1,466	\$ 1,597,979	1,466	\$ 2,217,630
Non-Public Co. with >\$500 Million DWP/GWP	453	\$ 1,240,101	538	\$ 1,659,168
<b>Total</b>	<b>1,919</b>	<b>\$ 2,838,080</b>	<b>2,004</b>	<b>\$3,876,798</b>
Total All Insurers	4,618	\$ 3,036,300	4,618	\$4,083,676
% of Total All Insurers	41.6%	93.5%	43.4%	94.9%



## AICPA Code of Professional Conduct – Revised Definition of Public Interest Entity

The AICPA Professional Ethics Committee (PEEC) adopted a revised definition of public interest entity (PIE) to be included in the AICPA Code of Professional Conduct (AICPA code), which is effective for periods beginning on or after December 15, 2024, with early implementation allowed.

In April 2022, the International Ethics Standards Board for Accountants' (IESBA) revised its definitions of listed entity and PIE. The IESBA code includes separate and, in many cases, more restrictive independence provisions for PIEs<sup>1</sup>. IESBA's new PIE definition contains three mandatory categories of PIEs:

- a. A publicly traded entity
- b. An entity one of whose main functions is to take deposits from the public
- c. An entity one of whose main functions is to provide insurance to the public

PEEC monitors and considers IESBA's projects to evaluate whether related changes will enhance the AICPA code and serve to better protect the public interest in the United States.

In December 2023, PEEC adopted a revised definition of PIE that includes IESBA's mandatory categories but defers to the relevant U.S. regulators for purposes of the specific independence requirements<sup>2</sup>. PEEC refined the insurance entity category to include insurers that

1. are subject to the NAIC Annual Financial Reporting Model Regulation (the Model Audit Rule, or MAR) adopted by the respective state insurance department and
2. meet or exceed \$500 million<sup>3</sup> in direct and assumed premiums.

A member who does not belong to a firm or network that voluntarily agrees to comply with the IESBA code will continue to comply only with the AICPA code and rules of the relevant regulator, where applicable. Firms that voluntarily join the [IFAC Forum of Firms](#) may have certain commitments to comply with the Forum of Firms Constitution. This may result in the inclusion of fee-related information for PIEs in communications with relevant regulators.

---

<sup>1</sup>The March 2024 "[Summary of prohibitions in IESBA Code applicable to audits of public interest entities](#)" issued by IESBA highlights specific prohibitions that are applicable to PIE audits. Details on the prohibitions for [nonassurance service](#) and [fees](#) for public interest entities can be found in the final pronouncement and basis for conclusion documents issued for these respective projects by IESBA.

<sup>2</sup> For additional details, refer to the "AICPA Professional Ethics Division: [Background and Basis for Conclusion: New Definition of Publicly Traded Entity and Revised Definition of Public Interest Entity](#)". In this document the NAIC's independence requirements in Section 7 of the MAR are acknowledged.

<sup>3</sup> During the May 2026 meeting, PEEC is expected to request to expose revisions to the definition of PIE to remove references to dollar thresholds.

DISCLAIMER: This publication has not been approved, disapproved, or otherwise acted upon by any senior committees of, and does not represent an official position of, the American Institute of Certified Public Accountants. It is distributed with the understanding that the contributing authors and editors, and the publisher, are not rendering legal, accounting, or other professional services in this publication. If legal advice or other expert assistance is required, the services of a competent professional should be sought.