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PLANNING FOR QUALITY REVIEW

When someone mentions quality review, how do you react? Perhaps you experience a twinge of nervousness, or maybe even fear grips you. If so, you are having a normal reaction, particularly if you have never had a review before.

I am the managing partner (we use the term *chief executive officer)* in a small, northern Louisiana firm which has three principals, and three professional and two administrative staff—a total of eight people. Together, we have been planning for our quality review, and have had similar reactions to those described above. We have had to look carefully at the services we provide clients, and we have had to make some tough decisions.

Decision number one

The first question we had to answer was whether we wanted to be a full-service firm with audit clients. I realize that it isn't unusual for smaller firms to question the extent of their audit services, and to look for ways to specialize and develop profitable niches. Nevertheless, it is always a tough question to answer. Forty percent of our firm's revenue comes from audit clients. Therefore, we decided we needed to remain full service. This was a qualified decision, however.

We decided we would no longer take on all types of accounting and auditing work. In particular, we decided that we would not do work for SEC clients. The SEC area was particularly important. When we compared the additional quality control requirements with the amount of SEC work that we did, such engagements simply made no sense for our practice.

With this decision, we had to make other arrangements for our SEC clients. Fortunately, we have been able to set up "sharing" relationships with several other firms which do SEC work. Written assurances that the client will not be stolen from us were prerequisite to these arrangements.

There is a flip side to these sharing agreements. We have been approached by smaller firms to do non-SEC audit work for their clients, while they retained other practice areas. To date, all of these arrangements have worked exceedingly well.

I would hesitate to offer blanket advice to other firms faced with similar decisions. The choices are difficult. Nevertheless, there is a definite cost-benefit ratio that can be quickly computed. For us, it was more cost effective to limit the financial review work in our practice.

Easing the fear factor

After deciding to stay with audits, our next move was to get as much information as possible on what a quality review would be like. Our top priority was to take the mystery out of the process.

We sent two of our firm principals to the Louisiana Society's *Preparing for Peer Review* course. To get the scoop from the other end of the process (to learn exactly what a reviewer would be considering), I attended a *How to Conduct a Peer Review* session. The knowledge we gained greatly eased our fear factor.

Our control document

Next, we chose one member of our firm to write our quality control document using the nine quality control elements described in Statement on Quality

(Continued on page 7)

What's Inside...

Bankruptcy: The U.S. Trustee System and the Accounting Profession (Part 2)

The first part of this article, in the April issue, dealt with applications for appointment of professionals, duties in bankruptcy, and payment of fees. This part will focus on some other often troublesome aspects.

Fee applications

The fee application is perhaps the most troublesome point in the bankruptcy system, as far as professionals are concerned. The application should be prepared with the understanding that, prior to approval by the court, creditors will be examining it as well as the U.S. Trustee. Each application must stand on its own and adequately reveal the nature and purpose of the services rendered. Keep in mind the following points:

- ☐ All professionals in the firm should be identified along with their rates charged.
- ☐ All activities should be identified clearly.
- ☐ A beginning narrative to any fee application for highlighting the results achieved is helpful.
- ☐ Abbreviations should be identified and explained.
- ☐ Duplication of efforts. Ample explanation should be made if more than one professional is involved in any one particular matter.
- ☐ Billings are to be contemporaneous. This is a sore point within the system in the sense that reconstruction of your time records for a month at a time is not satisfactory to the court in most cases. While this may be acceptable to regular clients, it should be modified for a client in the bankruptcy arena, that is, where you expect to be paid from assets of the debtor.
- ☐ Minimum times. Many jurisdictions will not permit uniform minimum times for phone calls, etc., that are not realistic. If such is the policy of the firm, there must be an adjustment.
- ☐ Travel time. Many courts allow one half of the normal hourly rate for travel time. You should find out what the court in your district allows.

A concern that frequently arises in rural areas of the country is that a complicated case will cause professionals to be drawn from distant metropolitan areas where the fee structure differs considerably. This should be discussed fully with local counsel and with the U.S. Trustee's office to try to determine the attitude of the judge in the court in which you are appearing. Most courts will grant you the fees normally charged in your metropolitan area, but you should be cautious about getting proper advice.

Keep in mind that both the courts and the U.S. Trustee place some reliance upon the professionals for the smooth administration of the bankruptcy system. A recognized quality professional is generally welcomed in the knowledge that the case will not come to a successful conclusion without his or her contribution.

One of the specified statutory duties of the U.S. Trustee is to review and comment on fee applications. If you have not previously worked in the bankruptcy field and are thus unfamiliar with preparing a fee application, you should consider submitting the application to the local U.S. Trustee's office for comment, prior to filing it with the court. In this manner, any deficiencies can be remedied prior to the court hearing on the application and perhaps avoid delaying the award of allowances.

The U.S. Trustee system was not set up to nitpick professionals. By passing the Bankruptcy Code, Congress intended that professionals be encouraged to come into the bankruptcy system and that they not be deprived of the fees they would ordinarily generate in their communities in nonbankruptcy matters.

In fee determination, there is a frequent reference in the case law to the so-called "lodestar theory." The theory, basically, is that *professionals are to be compensated based on reasonable hours times a reasonable fee per hour for necessary work.* Many frequently confuse the lodestar theory with bonuses or enhancements, meaning that over and above the fee to which you are entitled—the reasonable hours times the reasonable fee per hour—an additional fee or bonus is requested. Except in the most highly complex cases, which called for extraordinary skill beyond that contemplated in the basic rate structure, or where there is high risk to being paid, or where extraordinary, unexpected results were

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obtained, bonuses or fee enhancements are unlikely.

Plans and disclosure statements
In order to reorganize properly in Chapter 11, a debtor must issue what is known as a Disclosure Statement and a Plan of Reorganization—the contents of which are points of substantial contention among and between the debtor, bondholders, shareholders and, of course, creditors. Most plans are geared to future anticipated income or involve a refinancing, and necessarily require the expertise of accountants.

The code does not spell out in detail what is required in a disclosure statement, but in a successful reorganization, this will probably be the most time-consuming, critical event. This article cannot possibly do justice to treating the issue and it should be the subject of special study. The sections of the Bankruptcy Code that deal with this are §§1121–1129. Adequate disclosure is the key.

Overall approach
In most cases, especially where you are representing the debtor, the duty you have is a fiduciary one. This springs from the debtor's responsibility. Thus, at all times you must appreciate that the debtor is, in essence, the custodian for creditors' funds and is operating the business basically on their behalf. Remembering this solves a number of ethical problems that might arise in any bankruptcy. You must have free and open access to the debtor and counsel in order to satisfy yourself that what you are doing is in line with your professional, ethical requirements. In this area, it is those activities which benefit not only the debtor but other parties to the bankruptcy. Enough cannot be said concerning this point.

Preferences and fraudulent transfers
Preferential transfers are defined at code §547. Generally, they are those transfers which occur within ninety days preceding the bankruptcy and pay a past-due debt. This is another area where the accounting firm and the professional involved should have some degree of expertise. You should know what a preference is, as well as what is known as a fraudulent transfer §548—that is, transferring property without ample value being received. Again, this article does not permit adequate explanation, and the subject should be studied. The key is to know what preferential and fraudulent transfers are and to be prepared to examine the debtor's books and records with regard to them.

Budgeting
An unfortunate dilemma occurs in bankruptcy matters, in that the very people who are in bankruptcy and who have not managed their affairs in a fashion that is conducive to good business practices are now expected to do so. One of the areas is budgeting—in one-year, two-year, and five-year segments. Depending on the size and complexity of the individual Chapter 11, accountants should, and can, play a major role in this area from a standpoint of advice by participating in the budgetary process.

It frequently takes a third party to intervene in designing a budget that is neither pie-in-the-sky nor defeatist, but is one that is workable. This discipline is frequently foreign to many debtors, but the accountants must be quite forceful in this area if they are to exercise their professional judgment and duties in a Chapter 11.

Witnesses and appearances in court
Frequently, the accounting firm will be a major source of information to the court, and you can expect to be called as a witness on any number of occasions as the bankruptcy progresses through the system. (Any witness appearances are subject to normal billing practice.)

You must make sure you are properly briefed before you enter court. At a minimum, you must be alerted to the questions the lawyer will ask you, and to the questions the other side will most likely ask. It can be embarrassing when a complex question that was not reviewed before your appearance is asked in court. You must also be ready to answer those questions that could not be properly anticipated.

Summary
The bankruptcy system welcomes and encourages professionals to participate. A professional should always keep in mind, however, that there is a fiduciary relationship existent throughout the bankruptcy system for debtors and professionals involved with debtors.

Full disclosure is paramount to being appointed as a professional. Fee applications should stand on their own and be of sufficient detail and explanation that any third party with a smattering of knowledge of the case can quickly surmise as to the worthwhile benefits of the professional's involvement. Forecasting and heavy involvement in disclosure statements and plans of reorganization are major tasks which the accounting firm should assume. ☑

—by **John J. Grauer,** *U.S. Department of Justice, Office of the U.S. Trustee, Middle District of Pennsylvania, Suite 503, 225 Market Street, Harrisburg, Pennsylvania 17101*

Editor's note: Mr. Grauer would like to thank his colleagues Harold D. Jones (New York City), Novalyn L. Winfield (Newark), A. Grey Staples (Baltimore), and David S. Brady (Harrisburg) for their comments on an earlier draft of this article.

How to Use AICPA Software (*ATB Financial Statements*) in Your Practice

On June 1, the Institute will introduce a new software program that will make it easy for every practitioner to quickly produce complete financial statements that can be formatted to specific needs.

Developed by the AICPA to be used in conjunction with version 2.1 of its *Accountant's Trial Balance* (ATB) software program, the new *ATB Financial Statements* module enables users to create a complete set of financial statements for any trial balance generated from ATB.

ATB Financial Statements has the capability to quickly produce

- ☐ Balance sheets.
- ☐ Income statements (with changes in equity).
- ☐ Statements of cash flow (direct and/or indirect).
- ☐ Footnotes.
- ☐ Supplemental statements.
- ☐ Accountants' reports.
- ☐ Tables of contents.
- ☐ Cover pages.

Financial statements can be prepared from scratch or automatically from ATB's user-definable schedules, lead schedules, or chart of accounts. They can then be completely customized.

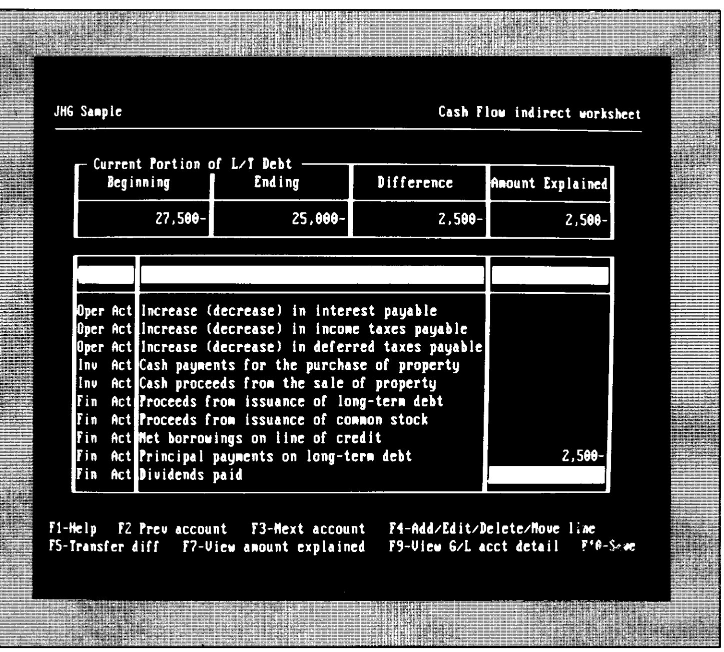
Every line on every statement can be given a supporting schedule. For example, if one line on the income statement is "General and Administrative Expenses," you can create a supporting schedule that lists the accounts and amounts that are included on that line.

Because *ATB Financial Statements* integrates with ATB, any changes in an ATB trial balance are immediately reflected in the financial statements. You only have to make one entry. All correcting entries are made automatically. In addition, the program's extensive formatting capabilities let you customize documents easily, and print clear, professional-quality financial statements suitable for distribution to third parties.

ATB Financial Statements was designed by the same practitioners and developers as other programs in the AICPA's Computerized Accounting Tool Series (CATS). Designed to be easy to learn and to use, all CATS programs share common menu structures, function key assignments, and program operations. Users of one CATS product can quickly learn how to use another one.

ATB Financial Statements is available in both 3½-inch and 5¼-inch formats for 100 percent IBM compatible computers with hard disk drives, 640K RAM, DOS version 3.1 or greater, and a printer capable of printing at least 132 characters per line. In addition, you must have ATB version 2.1 to use the program. For further information (including firm license pricing), call AICPA Software Support: (212) 575-5412.

ATB Financial Statements is shipped with ATB version 2.1. Owners of ATB versions 1.0 and 2.0 can purchase *ATB Financial Statements* (product no. 016360) at a member price of $236. The new order (product no. 016365) price to members is $476. (There is a money-back return policy if you are not satisfied.) Call the AICPA order department: (800) 248-0445. ☑



Questions for the Speaker (Staff Recruiting and Compensation)

Recruiting the type of staff needed and finding a suitable method for compensating and rewarding good employees are major areas of concern to many local firms. At various conferences dealing with these issues, practitioners have asked questions such as (1) Would you consider a percentage of chargeable time as a method of staff compensation and, if so, what percentage? (2) How can a two-partner, ten-staff firm recruit good people? and (3) How can staff members share in the firm growth for which they are responsible? Let's see how three different firms respond to some of the questions.

Regarding the first question, I have read many books and articles dealing with this subject but I have difficulty with the concept. Compensation based on a percentage of chargeable time discourages people from being entrepreneurial-minded within the firm and inhibits them from coming up with ideas which, in the long run, increase the firm's productivity.

Employees should be given chargeable-hour goals, but you don't want them to sacrifice their own goals for the sake of teamwork. A member of the staff must feel free to go to someone more experienced with a question, even if that person's time cannot be charged to a client. People must have an incentive to become team members.

Focusing on the second question, recruitment requires commitment and planning whether yours is a national firm or you are recruiting your first staff member. You must determine what advantages your firm can offer employees. In a smaller firm this might be the opportunity for faster and nonstructured growth, as well as direct client contact. The last-named item is particularly important to many potential employees. When planning your recruiting efforts, first identify your client base, and then determine and try to obtain the types and levels of skills needed to match that base.

—*by* **Abram J. Serotta, CPA,** *Serotta, Maddocks & Devanny, 1261 Greene Street, Augusta, Georgia 30901*

Concerning the recruitment question, usually, a two-partner, ten-staff firm will be able to recruit more successfully against larger firms when the main part of the recruiting season is over. The firm should wait until February, then go to local schools. At that time, they will have the opportunity to interview those students who were unable to make up their minds during the regular recruiting season. In addition, larger firms tend to overlook some of the local schools.

Turning to the last question, the staff can share in firm growth by recognizing a clear path to partnership. It will be possible to achieve partnership in a shorter period of time in a growing firm, provided the staff member is willing to dedicate himself or herself towards achieving a high level of proficiency, and is willing to devote the hours necessary to gaining the required experience.

—*by* **Richard A. Berenson, CPA,** *Berenson, Berenson, Adler & Co., New York, New York 10017*

The question of staff compensation is a complex one. While chargeable time should be an important factor in evaluating overall performance, it should not be the sole determinant of staff compensation. All compensation should be a reflection of complete performance, however, including nonchargeable duties and abilities. Quality of work is as important as quantity, and employees should not have chargeable time as their only or primary objective. Clients expect service value and this requires a CPA firm to have a staff of well-rounded, well-trained, and hard-working individuals.

Among the criteria that should be considered in determining staff compensation are contributions

1990 AICPA National Small Firm Conference

This year, the AICPA management of an accounting practice will present its tenth annual conference geared specifically to the needs of sole practitioners, and firms with two to four partners, two to twenty total staff, and gross fees of up to $1 million. Participants will be able to attend three general sessions—increasing firm profits, how to turn your clients into cheerleaders, and setting long-term priorities in a changing profession—and select from concurrent sessions.

Discussion topics at the concurrent sessions will include small firm specialization, organizing your firm for billing and collection, increasing productivity through time management and delegation, small firm merger/acquisition opportunities, and partner compensation.

Evening sessions include an open practice management forum and "30-Minute MAP"—informal minipresentations on defensive practices to avoid lawsuits, computerization of daily time reports, how to deal with the troubled employee, hot tips for practitioners, processing individual tax returns in-house, and evaluating your clients.

In addition, on the second day of the conference, there will be an "early bird" session from 7:45 A.M. to 8:50 A.M. that deals with developing a practice continuation agreement. (Registered guests are encouraged to attend.)

The Small Firm Conference will be held on two dates in two different locations:

August 15–17	October 31–November 2
The Westin Copley Place	Marriott Hotel & Marina
Boston, Mass.	San Diego, Calif.

Registration fee is $475. Recommended CPE credit is up to 19 hours of practice management discussion depending on the number of sessions attended and state requirements.

For more information, contact the AICPA practice management division: (212) 575-3814.

to the firm in the form of ideas, procedures, and other enhancements to efficiency. Development and training of other staff, supervisory skills, and educational strengthening are other factors. Attitude and relationship abilities, involvement in outside activities, and communication and organizational skills and abilities should also be considered. There are many requirements. Chargeable time is only one component.

In answer to the question of recruitment, a small firm has advantages that can be used to attract the type of staff it wants, just as larger, diversified firms do. The firm must sell itself. Whatever attributes it has that keep it successful and flourishing should be publicized and presented to potential employees. The key to successful recruiting is to have some of the professionals who understand the firm's structure and workings, and who believe in its policies and procedures, market the career and education that it can offer.

The last question is important because in today's environment, employees need to experience a sense of belonging and importance in the overall operation of an organization. As a firm continues to grow and prosper, it is essential to recognize the efforts of those who contribute to its success. Recognition can be shown through various actions such as

- ☐ Providing new opportunities for challenging and rewarding work. This means ensuring job satisfaction, growth, and development of knowledge so that people can advance in the organization.
- ☐ Providing fair, market-level compensation, and by establishing other policies, including bonus and incentive programs. Other actions might be to institute training and development programs over and beyond CPE requirements, and to sponsor events in a valued employee's name.
- ☐ Firm flexibility in adapting to society's demands on employees. This might mean providing part-time employment, using paraprofessionals, and establishing personal time banks.

In short, a growing, prosperous firm will take whatever steps are needed to show employees that it is an organization which is willing to share its success with valued contributors. ☑

—by **Laura Durant,** *Israeloff, Trattner & Co., 11 Sunrise Plaza, Valley Stream, New York 11581*

Editor's note: Ms. Durant is director of human resources at Israeloff, Trattner & Co.

AICPA CPE Conference Schedule

National Conference on Divorce
June 11–12—Atlanta, GA

National Tax Education Program
Week I **June 18–22**—Champaign-Urbana, IL
Week II **June 25–29**—Champaign-Urbana, IL
Week III **July 9–13**—Champaign-Urbana, IL
Week IV **July 16–20**—Champaign-Urbana, IL
Week V **July 23–27**—Champaign-Urbana, IL

National Accounting & Auditing Advanced Technical Symposium
June 25–26—San Francisco, CA
July 9–10—Boston, MA

Employee Benefits
June 25–26—Washington, DC

CPA's Role in Litigation Support Services
July 12–13—Dallas, TX
September 6–7—Washington, DC

Annual Advanced Estate Planning Conference
July 25–27—Toronto, Ontario

OMB Circular–133A
August 1—Washington, DC
August 6—Atlanta, GA
August 8—St. Louis, MO
August 17—San Francisco, CA
September 11—New York, NY

Duke/AICPA Managing Partner Leadership Institute
August 19–24, October 28–November 2—Durham, NC

National Governmental Training Program
October 10–12—Las Vegas, NV

National Conference on Federal Taxes
November 5–6—Washington, DC

Firm Administrators Conference
November 7–9—Las Vegas, NV

National Construction Industry Conference
December 3–4—Las Vegas, NV

National Governmental Accounting and Auditing Update
(Second presentation)
December 6–7—San Francisco, CA

National Conference on Federal Taxes
(Second presentation)
January 7–8, 1991—San Francisco, CA

Tax Season Update
January 10–11, 1991—Orlando, FL

For more information, or to be put on brochure mailing list, call (800) 242-7269; in New York State, (212) 575-5696. ☑

Planning For Quality Review *(continued from page 1)*
Control Standards no. 1. Now I realize that it is not necessary for a firm to have a quality control document, but we thought it important because of the amount and variety of audit work we perform in our practice. We are also aware that control documents can be purchased and adapted for use in one's own firm. But, we chose not to buy one.

We preferred to start from scratch because this would force us to think. While thinking takes time and commitment, it reinforces the importance of the process.

I must confess that we did not literally start from scratch. Besides taking notes at our CPE courses, we used the *Guide to Quality Control* issued by Practitioners Publishing Company. We kept our document simple. It contains only the minimum policies and procedures to meet the minimum standards. This allows flexibility later on, because once a procedure is written in your document, you are obligated to follow it precisely.

When the first draft of the quality control document was written, all aspects were discussed by firm principals, changes were made, and a second draft was circulated to all staff for comments. These comments were considered, and two weeks later we had our document.

Beefing up the library and rethinking CPE
Another decision we made was to increase the number of resources available in our accounting and auditing library. We now have the FASB looseleaf service, the *Miller Guides* (all three), and almost all the guides and manuals issued by the Practitioners Publishing Company. Our budget for accounting and auditing publications is now as large as the one for tax references.

Because we do government audits, the majority of our CPE is in the accounting and auditing area—and it's a lot. Under the *Government Auditing Standards* issued by the U.S. General Accounting Office (the Yellow Book), all three principals and the three accounting staff members must have eighty hours of CPE by January 1, 1991, with twenty-four hours in government accounting and auditing. On top of that, we still need to keep up with tax issues.

CPE comprises one of the largest costs with which we are grappling. Not only are the costs high in terms of budgetary dollars, but they are also high in terms of travel and nonbillable hours.

So, how are we handling it? Well, we haven't got all the answers, but we are pursuing the problems. We do know some of our options. These are to encourage more applicable CPE at the chapter levels, pursue in-house CPE, and to share in-house planning and teaching with some other firms.

We also made some decisions about our administrative procedures. Here is a quick summary.

- ☐ We created checklists for audits, reviews, and compilations.
- ☐ All audit and review reports must be checked by a second principal before they are released.
- ☐ Our hourly rates for audits and tax services will remain the same, even during slow seasons.

The AICPA Consulting Review Program

The consulting review the firm of Perry, Parker and Powell found invaluable in assuaging fears about its upcoming quality review (see "Planning for Quality Review," page 1) is an AICPA program designed to help local firms improve the quality of their practices.

Consulting reviews are educational in nature and are conducted on the reviewed firm's premises by an experienced reviewer selected by the organization administering the program. During the visit, the reviewer obtains an understanding of the firm's system of quality control by interviewing appropriate firm personnel and by completing a questionnaire.

This is followed by a discussion of the firm's responses to the reviewer's questions and, perhaps, by the reviewer dealing with specific quality control problems raised by the firm. The reviewer also performs a limited review of selected reports, accompanying financial statements, and working papers for each type of service (audit, review, and compilation) that the firm performs.

For many firms, the attractive aspects of this program are that it is confidential, risk-free, and inexpensive. The results of the review, including any suggestions for improvement, are discussed orally at its completion. No written notes pertaining to the review of the firm's records are retained by the reviewer or by the administering organizations. The reviewer's comments are offered for the firm's consideration and are subject to its professional judgment and evaluation in making use of them.

For firms with up to about twenty professionals, the review involves one reviewer for one day and costs $500 plus expenses. For larger firms, the review may take longer and cost proportionately more.

For more information about the consulting reviews contact your state society or Raymond Lipay at the Institute: (212) 575-5477.

With all this thinking about our practice, we have also considered our future. We thought about merging with a larger firm, but decided to stay as we are for the present time. We do plan to become participants in our state society appointed review teams, although it will be a year or so before we become involved.

Slaying the QR dragon

As a final step in planning for our quality review, we decided to take a trial run—to have a consulting review. We thought this would remove any lingering kinks in our program, rid us of nervousness, and be a way to finally slay the QR dragon.

We had the consulting review in October, last year. It went well. One of our partners had met someone from a large local firm in Jackson, Mississippi, when taking a CPE course in that city. We thought that Jackson was far enough away from Monroe to safeguard against competition but close enough to keep travel costs from being excessive, and decided to ask the firm to conduct our consulting review.

First, we made sure that our firms do similar work. This is an important element of the consulting review program. We wanted to be sure they would provide us with a knowledgeable assessment based on the specific type of work we perform.

We were ready with a list of questions and five sets of different engagement workpapers and reports when the consultant arrived on the Monday morning. After a briefing on our practice, the consultant answered our questions for two hours. Most of these were related to our documentation. We wanted to be sure we had the correct documentation for all of our different types of engagements.

After lunch, the consultant reviewed our quality control document, workpapers, and reports. Overall, we were in good shape. More important, though, besides offering some helpful suggestions about strengthening quality control, the consultant was able to ease our minds about our upcoming quality review. At $500, plus the cost to the consultant of travel and lost billable time, it was well worth the investment.

Now that you have a taste of what quality review planning entailed at one local firm, you might wonder whether the program is really that beneficial. My response is, absolutely. As a client said, a short while back, "If it were an easy profession, everyone would be in it." Lucky for us, everyone is not. ☑

—by **Rowland H. Perry, CPA,** *Perry, Parker & Powell, 1209 Royal Avenue, Monroe, Louisiana 71201*

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