



National Association of State Boards of Accountancy

150 Fourth Avenue North ♦ Suite 700 ♦ Nashville, TN 37219-2417 ♦ Tel 615/880-4200 ♦ Fax 615/880-4290 ♦ Web www.nasba.org

September 2, 2024

Professional Ethics Executive Committee
American Institute of Certified Public Accountants
1345 Avenue of the Americas
New York, NY 10105

Via e-mail: ethics-exposedraft@aicpa.org

Re: Exposure Draft: Proposed revised interpretation: Tax Services

Dear Members and Staff of the AICPA Professional Ethics Executive Committee (PEEC):

The National Association of State Boards of Accountancy (NASBA) appreciates the opportunity to comment on the above-referenced Exposure Draft, ***Proposed revised interpretation: Tax Services*** (the Exposure Draft). NASBA's mission is to enhance the effectiveness and advance the common interests of State Boards of Accountancy (State Boards) that regulate all Certified Public Accountants (CPAs) and their firms in the United States and its territories, which includes all audit, attest and other services provided by CPAs. State Boards are charged by law with protecting the public.

In furtherance of that objective, NASBA supports the PEEC in this initiative. We have reviewed the Exposure Draft and offer the following comments.

Comments on Specific Questions

a. What are your thoughts on providing attest clients tax advisory or tax planning services and, specifically, on those services that may involve a higher level of uncertainty (as opposed to general tax advisory or tax planning services)?

NASBA believes that the threshold to evaluate independence when providing attest clients tax advisory or tax planning services that may involve a higher level of uncertainty should be consistent with the current guidance of U.S. regulators and standard setters.

b. Do you agree with the proposal to revise the existing "Tax Services" interpretation to include tax advisory and tax planning services rather than to create a new interpretation? If you disagree, please explain why.

NASBA agrees with the proposal to revise the existing "Tax Services" interpretation to include tax advisory and tax planning services rather than to create a new interpretation.

c. Do you agree with the addition of the advocacy threat when evaluating tax services for independence? If you disagree, please explain why.

NASBA agrees with the addition of the advocacy threat when evaluating tax services for independence.

d. Do you agree with the proposal to use the more-likely-than-not threshold for independence? If you disagree, please explain why.

NASBA agrees with the use of the more-likely-than-not threshold for independence. NASBA believes that the more-likely-than-not threshold will promote consistency in practice because it is consistent with guidance established by U.S. regulators and standard setters regarding the likelihood of success when evaluating uncertain tax positions.

e. Do you agree that the effective date provides adequate time to implement the proposals? If you disagree, please explain why.

NASBA agrees that the effective date provides adequate time to implement the proposals.

* * * * *

We appreciate the opportunity to comment on the Exposure Draft.

Very truly yours,



Stephanie M. Saunders, CPA
NASBA Chair



Daniel J. Dustin, CPA
NASBA President and CEO