



National Association of State Boards of Accountancy

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March 21, 2025

International Auditing and Assurance Standards Board (IAASB)  
529 Fifth Avenue  
New York, NY 10017

Via website: [www.iaasb.org](http://www.iaasb.org)

**Re: Invitation to Comment Before the IAASB Finalizes the Narrow Scope Amendments to the ISQMs and ISAs as a Result of the Revisions to the Definitions of Listed Entity and Public Interest Entity in the IESBA Code**

Dear Members and Staff of the IAASB:

The National Association of State Boards of Accountancy (NASBA) appreciates the opportunity to comment on the *Invitation to Comment Before the IAASB Finalizes the Narrow Scope Amendments to the ISQMs and ISAs as a Result of the Revisions to the Definitions of Listed Entity and Public Interest Entity in the IESBA Code* (the Invitation to Comment). NASBA's mission is to enhance the effectiveness and advance the common interests of the 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. Our comments on the Exposure Draft are made in consideration of the State Boards' of Accountancy charge as regulators to protect the public interest.

In furtherance of that objective, NASBA supports the IAASB in this initiative and offers the following comments to the specific questions on forward-looking matters included in the Invitation to Comment.

**Specific Questions**

***(a) Do you agree with the proposed effective date of the narrow scope amendments, i.e., for audits of financial statements for periods beginning on or after December 15, 2026, to be aligned with the standards from the Going Concern and Fraud projects? (See Section V, paragraphs 35-37.)***

NASBA appreciates the desire to have the proposed effective date of the narrow scope amendments - for audits of financial statements for periods beginning on or after December 15, 2026 - align with the standards from the Going Concern and Fraud projects. However, from a regulator perspective, there would be risk in practice from a compliance standpoint given the extended period of time that may be needed for local jurisdictions to act upon the revised standards.

***(b) Do you agree with the IAASB's commitment to revisit the decision to adopt the definition of PIE in the IESBA Code (adapted as necessary for the ISQMs and ISAs) and extending differential requirements to apply to audits of PIEs? (See Section IV, paragraph 31 and Section V, paragraph 38.)***

NASBA agrees.

***(c) Do you agree with the proposed timing for revisiting the matters highlighted in (b) above? (See Section V, paragraphs 39-41.)***

NASBA agrees with the proposed timing for revisiting the matters highlighted in (b) above.

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We appreciate the opportunity to comment on the Invitation to Comment.

Very truly yours,

*Maria E. Caldwell*

Maria E. Caldwell, CPA  
NASBA Chair

*Daniel J. Dustin*

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NASBA President and CEO