EXPOSURE DRAFT OF PROPOSED ISRE 2410 (REVISED), *REVIEW OF INTERIM FINANCIAL INFORMATION PERFORMED BY THE INDEPENDENT AUDITOR OF THE ENTITY'S ANNUAL FINANCIAL STATEMENTS*

Response Form

Guide for Respondents

Comments are requested by **September 3, 2026**. *Note that requests for extensions of time cannot be accommodated due to the timeline for finalization of this proposed revised standard.*

This form is for providing comments on the Exposure Draft of proposed International Standard on Review Engagements™ (ISRE) 2410*, Review of Interim Financial Information Performed by the Independent Auditor of the Entity's Annual Financial Statements* (ED-2410), in response to the questions set out in the Explanatory Memorandum (EM) to ED-2410. It also allows for respondent details, demographics and other comments to be provided. Use of this form will facilitate the IAASB's analysis of the responses.

You may respond to all questions or only those questions for which you have specific comments.

To assist our consideration and analysis of your comments, please:

- For each question, start by indicating your overall response using the drop-down menu under each question. Include any detailed comments below that, as indicated.
- When providing comments, respond directly to the questions and:
    - Provide the rationale for your answers. If you disagree with the proposals in ED-2410, please provide specific reasons for your disagreement and include specific suggestions for changes (including specific wording) that may be needed to the requirements, application material or appendices. If you agree with the proposals, it will be helpful for the IAASB to be made aware of this view as support for the IAASB's proposals cannot always be inferred when not stated.
    - Be specific about the sections, headings or paragraphs in ED-2410 to which your responses relate.
    - Refrain from inserting tables or text boxes in your responses.

It is not necessary to include a cover letter containing a summary of your key issues. The response form provides the opportunity to include any other views you wish to place on the public record, should you choose to do so. All responses will be considered a matter of public record and will ultimately be posted on the IAASB website.

Use the "**Submit Comment**" button on the web page for proposed ISRE 2410 (Revised) to upload the completed form.

Responses to IAASB's Request for Comments in the EM for ED-2410, Review of Interim Financial Information Performed by the Independent Auditor of the Entity's Annual Financial Statements

PART A: Respondent Details and Demographic information

Your organization's name (or your name if you are making a submission in your personal capacity)	National Association of State Boards of Accountancy (NASBA)
Name(s) of person(s) responsible for this submission (or leave blank if the same as above)	Nicola Neilon, CPA – NASBA Chair Daniel J. Dustin, CPA – NASBA President and CEO
Name(s) of contact(s) for this submission (or leave blank if the same as above)	Jessica Luttrull
E-mail address(es) of contact(s)	jluttrull@nasba.org
Geographical profile that best represents your situation (i.e., the geographical perspective from which are you providing feedback on ED-2410). Select the most appropriate option.	North America If "Other", please clarify
The stakeholder group to which you belong (i.e., the perspective from which are you providing feedback on ED-2410). Select the most appropriate option.	Regulator or assurance oversight authority If "Other", please specify
Should you choose to do so, you may include information about your organization (or yourself, as applicable).	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. It is in furtherance of that objective that NASBA offers the following comments.

Should you choose to do so, you may provide overall views or additional background to your submission. **Please note that this is optional**. The IAASB's preference is that you incorporate all your views in your comments to the questions (also, Question 16 in Part B allows for raising any other matters in relation to ED-2410).

Information, if any, not already included in responding to the questions in Part B:

Click or tap here to enter text.

PART B: Responses to Questions in the EM for ED-2410

For each question, please start with your overall response by selecting one of the items in the drop-down list under the question. Provide your detailed comments, if any, below as indicated.

Overall Impact

1.	Do you agree that ED-2410 is **responsive to the public interest**, considering the qualitative standard-setting characteristics and the standard-setting actions in the project proposal? (*See Section I-A and the Appendix in the EM)*

Overall response: **Agree, with comments below**

Detailed comments (if any):

NASBA believes that ED-2410 is generally responsive to the public interest. Modernization of a standard that has not been comprehensively revised since 2005 is appropriate, particularly given changes in the financial reporting environment and developments in standards addressing quality management, fraud, going concern, auditor reporting, and other public-interest matters.

NASBA also supports the IAASB's objective of establishing a global baseline for consistent performance and reporting. From the perspective of State Boards and their public-protection mandate, clear, consistently applicable standards assist both practitioners and regulators by establishing understandable expectations for the performance of professional services.

At the same time, it is important that the revised standard preserve the fundamental distinction between an interim review, which provides limited assurance, and an audit, which provides reasonable assurance. Requirements or reporting language that could lead users to infer a greater level of assurance than is supported by the procedures performed may increase rather than reduce the expectation gap.

2.	Do you agree that ED-2410 strikes **an appropriate balance** between the work effort required to express a limited assurance conclusion on the interim review engagement, and more robust requirements in the public interest in certain areas (e.g., going concern, fraud and non-compliance with laws and regulations)? You are invited to include as part of your response insights on **the implications or effects** of implementing the proposed standard.

Overall response: **Agree, with comments below**

Detailed comments (if any):

NASBA generally agrees, except with respect to the proposed going concern reporting requirements.

A review continues to rely primarily on inquiry and analytical procedures and provides substantially less assurance than an audit. Requirements that resemble audit requirements, particularly when coupled with explicit statements in the auditor's report, may cause users to believe the auditor performed more extensive procedures than were actually required.

NASBA believes the work effort balance is generally appropriate but recommends reconsideration of the going concern reporting requirements in response to Question 13.

Professional Skepticism and Professional Judgment

3.	Does ED-2410 appropriately address the foundational concepts of professional skepticism and professional judgment, and the importance of applying these concepts throughout the interim review engagement? If not, what more might be needed in this regard? *(See Section I-B, paragraph 22(a) in the EM)*

Overall response: **Yes (with no further comments)**

Detailed comments (if any):

Click or tap here to enter text.

Fundamental Principles of an Interim Review Engagement

4.	Does the Introduction section of ED-2410 provide a clear description of the nature and purpose of an interim review engagement, and how it differs from an audit of financial statements, to provide foundational context for the work effort needed to achieve the objective of the engagement? *(See Section I-B in the EM)*

Overall response: **Yes (with no further comments)**

Detailed comments (if any):

Click or tap here to enter text.

5.	Is ED-2410 sufficiently clear that while the auditor performs primarily inquiries and analytical procedures, *all procedures* performed for the purpose of achieving the overall objective of the interim review engagement are "review procedures"? If not, what suggestions do you have to make this clearer? *(See Section I-F, paras. 44-47 in the EM)*

Overall response: **Yes (with no further comments)**

Detailed comments (if any):

Click or tap here to enter text.

Approaching an Interim Review Engagement in Accordance with ED-2410

6.	Is it sufficiently clear that, for recurring engagements, the auditor leverages the knowledge and understanding obtained from previous annual audits and interim review engagements for the entity? If not, what suggestions do you have to make this clearer? *(See Section I-B and Section I-F, paragraphs 44-52 in the EM)*

Overall response: **Yes (with no further comments)**

Detailed comments (if any):

Click or tap here to enter text.

7.	Do you agree with the considerations that apply when the review of interim financial information is the first engagement performed for the audit client? If not, what suggestions do you have for additional considerations related to first-time interim review engagements? *(See Section I-F, paras. 48-52 in the EM)*

Overall response: **Agree (with no further comments)**

Detailed comments (if any):

Click or tap here to enter text.

Materiality

8.	Do you agree with the requirement for the auditor to determine materiality for the interim review engagement, and the related application material that describes the relevant principles that apply? If not, what would you suggest? *(See Section I-F, paragraphs 41-43 in the EM)*

Overall response: **Agree (with no further comments)**

Detailed comments (if any):

Click or tap here to enter text.

Group Interim Review Engagements

9.	Overall, do you agree that ED-2410 is capable of being applied for the review of interim financial information of groups? If not, please explain your reasons, and provide suggestions for additional requirements or application material that might be needed. *(See Section I-F, paragraphs 37-40 in the EM)*

Overall response: **Agree (with no further comments)**

Detailed comments (if any):

Click or tap here to enter text.

10.	Are the requirements in ED-2410 that address specific considerations related to group interim review engagements appropriate? If not, please explain your reasons, and provide suggestions for additional requirements or application material that might be needed. *(See Section I-F, paragraphs 37-40 in the EM)*

Overall response: **Yes (with no further comments)**

Detailed comments (if any):

Click or tap here to enter text.

Fraud and Non-Compliance with Laws and Regulations (NOCLAR)

11.	Do you agree that the work effort requirements related to fraud and NOCLAR are appropriate and proportionate to the circumstances of an interim review engagement, recognizing that the engagement is performed by the auditor of the entity's annual financial statements and has responsibilities related to fraud and NOCLAR in the context of that engagement? If not, please explain your reasons, and provide suggestions for the auditor's approach to fraud and NOCLAR in an interim review engagement. *(See Section I-F, paras. 54-56 in the EM)*

Overall response: **Agree, with comments below**

Detailed comments (if any):

NASBA believes the proposed work effort requirements relating to fraud and NOCLAR are appropriate and proportionate to the circumstances of an interim review engagement.

Fraud and violations of laws and regulations can directly affect the reliability of financial information and therefore are clearly matters of public interest. NASBA supports requiring the auditor to make relevant inquiries, remain alert to information identified during the engagement, and appropriately respond when fraud, suspected fraud, NOCLAR, or suspected NOCLAR comes to the auditor's attention.

NASBA believes the requirements remain within the limited assurance framework. The auditor is not required to conduct a fraud investigation or perform an audit-level search for noncompliance. However, when information comes to the auditor's attention, the auditor cannot ignore it and must obtain sufficient information to evaluate its potential effect.

NASBA encourages continued IAASB-IESBA coordination so that practitioners can clearly determine applicable ethical obligations, including external reporting responsibilities, without conflict with jurisdictional confidentiality requirements.

Going Concern

Questions 12 and 13 below address both the auditor's work effort related to going concern in an interim review engagement and transparency about going concern in the interim review report.

12.	Do you agree that the work effort requirements related to going concern are appropriate and proportionate to the circumstances of an interim review engagement, recognizing that the engagement is performed by the auditor of the entity's annual financial statements and has responsibilities related to going concern in the context of that engagement? If not, please explain your reasons and provide suggestions for how ED-2410 should address the auditor's responsibilities related to going concern in an interim review engagement. *(See Section I-F, paras. 57-61 in the EM)*

Overall response: **Agree, with comments below**

Detailed comments (if any):

NASBA generally agrees that the proposed going concern procedures are appropriate. An auditor reviewing interim financial information must consider whether that information is prepared in accordance with the applicable financial reporting framework, which necessarily includes consideration of the appropriateness of the going-concern basis where applicable.

However, going concern differs from many other areas of an interim review because it is inherently forward-looking. ED-2410 requires management's assessment to cover at least twelve months from the date of approval of the interim financial information and requires the auditor to consider management's plans when relevant events or conditions exist. NASBA is concerned that this expanded and explicit responsibility could be perceived as requiring audit-like work even though the engagement continues to be based primarily on inquiry and analytical procedures.

NASBA therefore encourages the IAASB to preserve clear language throughout the requirements and application material that the auditor's work remains proportionate to a limited assurance engagement. If inquiries and analytical procedures indicate that a material misstatement may exist, additional procedures are appropriate. Otherwise, the requirements should not be interpreted as requiring an audit of management's going-concern assessment or forecasts.

13. Do you agree with the proposals to introduce a new separate section relating to going concern in the auditor's interim review report? If not, please explain your reasons and provide suggestions for how ED-2410 should address transparency about going concern in the interim review report.

    (See Section I-H, paragraphs 74-79 in the EM)

Overall response: **Agree, with comments below**

Detailed comments (if any):

NASBA does not support requiring a separate Going Concern section in every interim review report when no material uncertainty or other significant going concern matter has been identified.

NASBA supports transparent reporting when there is an actual going concern issue. However, from a public-protection perspective, NASBA is concerned that routinely including a Going Concern section in an otherwise unmodified interim review report may increase the expectation gap.

The proposed standard would require explicit statements that nothing has come to the auditor's attention indicating that management's use of the going concern basis is inappropriate or that a material uncertainty exists. Although these statements are drafted using limited assurance terminology and are accompanied by a statement that they are not a guarantee, a user may nevertheless interpret a separate Going Concern section as evidence that the auditor conducted a substantially more extensive evaluation of the entity's future viability than a review engagement requires.

NASBA recommends that going concern reporting in an interim review remain exception-based. A separate section should be required when a material uncertainty exists or when another going concern matter is sufficiently significant to warrant drawing users' attention to it. When no such matter exists, a limited assurance conclusion should be sufficient.

In particular:

(a) Do you agree with the proposed required statements, appropriately worded for a limited assurance engagement, relating to the going concern basis of accounting and whether a material uncertainty exists? If not, please explain your reasons and provide suggestions for how such statements should be worded in the interim review report.

Overall response: **Disagree, with comments below**

Detailed comments (if any):

NASBA does not support requiring the proposed statements in every report.

Although the wording uses “nothing has come to our attention,” placement in a dedicated Going Concern section may overshadow the negative assurance wording and suggest that the auditor has provided a separate level of assurance on the entity's ability to continue as a going concern.

(b) Do you agree that the circumstances addressed in the requirements in paragraphs 108-111 of ED-2410 capture the most frequently encountered scenarios in practice? If not, please explain your reasons and provide suggestions for any other scenarios that should be addressed in ED-2410.

Overall response: **Agree (with no further comments)**

Detailed comments (if any):

Click or tap here to enter text.

(c) Do you agree with the requirement in paragraph 111 of ED-2410 to include a reference in the interim review report to disclosure(s) of a going concern matter, other than a material uncertainty (for example, a “close call”) only when the matter is, in the auditor’s professional judgment, of such importance that it is fundamental to users’ understanding of the interim financial information, and to do so in a manner akin to an emphasis of matter paragraph? If not, please explain your reasons and provide suggestions for how such matters should be addressed in ED-2410.

Overall response: **Agree (with no further comments)**

Detailed comments (if any):

The Auditor's Interim Review Report

General

14. Do you agree with the proposed new structure of the auditor's interim review report? In particular, consider whether the new structure may be clearer for intended users of the report since it is consistent with the structure of the auditor's report on the financial statements. If not, please explain your reasons, including any suggestions for how the interim review report can be made clearer for intended users.

    (See Section I-H, paragraphs 65-68 in the EM)

Overall response: **Agree, with comments below**

Detailed comments (if any):

NASBA supports the IAASB's efforts to improve the clarity and communicative value of the auditor's interim review report. NASBA also recognizes that the term "auditor" is used in ISRE 2410 because of the practitioner's relationship to the entity as the independent auditor of the entity's annual financial statements and not because the auditor is performing an audit.

From a public protection perspective, NASBA believes this distinction should remain readily apparent to users of the interim review report. The proposed title, **"Independent Auditor's Interim Review Report,"** accurately identifies both the status of the practitioner and the nature of the engagement. Nevertheless, when that terminology is considered together with other proposed changes that more closely align the structure and presentation of the interim review report with the auditor's report on annual financial statements, there is a risk that users may perceive the interim review as providing a level of assurance more closely resembling an audit.

This concern is particularly relevant when the proposed report structure is considered cumulatively with the use of a Conclusion and Basis for Conclusion, references to sufficient appropriate evidence, and the proposed separate Going Concern section. Although each of these elements may be appropriate individually and the report explains that the engagement provides limited assurance, their cumulative effect could unintentionally blur the distinction between an interim review and an audit for users who may not fully understand the technical differences between limited and reasonable assurance.

Accordingly, NASBA recommends that the IAASB consider whether additional differentiation in the form, terminology, or presentation of the interim review report would help reinforce that the engagement is a limited assurance review rather than an audit, such as the title, "**Interim Review Conclusion Issued by the Independent Auditor of the Entity's Annual Financial Statements**". Such clarity would further the public interest by reducing the risk of an expectations gap regarding the nature and level of assurance provided by the interim review engagement.

The Auditor's Interim Review Conclusion

15. Do you foresee any practical consequences from the approach in ED-2410 that the auditor's interim review conclusion would differ, depending on whether the applicable financial reporting framework is a fair presentation framework or a compliance framework, as defined in paragraph 13(b) of ED-2410? Please be as specific as possible in describing any potential issues and suggestions for how the IAASB may address them.

(See Section I-H, paragraphs 69-73 in the EM)

Overall response: **Neither yes/no, but see comments below**

Detailed comments (if any):

NASBA understands the IAASB's concern that differing characterization of the same or similar interim financial reporting frameworks could result in different forms of auditor conclusions across jurisdictions. However, NASBA found the question difficult to interpret in practical terms.

NASBA recommends further clarification of the question and the underlying issue before finalizing the standard.

Other Matters

16. Are there any other matters you would like to raise in relation to ED-2410? If so, please clearly indicate the specific paragraph numbers of any requirements, application material, or Appendix, to which your comments relate. If you provide views on other matters, please use subheadings in your response to clearly identify and distinguish different matters.

Overall response: **No other matters to raise**

Detailed comments (if any):

Click or tap here to enter text.

Translations

17. Recognizing that many respondents may intend to translate the final standard for adoption in their own environments, have you identified any potential translation challenges or issues?

    If so, please describe the issue identified and clearly indicate the specific paragraph numbers of any requirements, application material, or specific illustrations or appendices to which your comments relate.

Overall response: **No response**

Detailed comments (if any):

Click or tap here to enter text.

Effective Date

18.	The IAASB believes that an appropriate implementation period would be approximately 18 months after the expected date of approval of the proposed revised standard. Do you agree that this will provide a sufficient period to support effective implementation of the proposed standard? If not, what do you propose and why? *(See Section I-I, paragraphs 85-86 in the EM)*

Overall response: **Agree (with no further comments)**

Detailed comments (if any):

Click or tap here to enter text.

Questions to Inform the International Ethics Standards Board for Accountants (IESBA)

The IESBA is seeking views from respondents related to the application of the IESBA Code. Respondents for whom these questions are relevant are encouraged answer these questions to inform the IESBA's consideration of the need for any future actions.

(See the Introduction, paragraphs 12-14, and Section I-C in the EM)

Group Interim Review Engagements

E.1. Recognizing that ED-2410 requires the auditor to comply with relevant ethical requirements, including those related to independence, when performing an interim review engagement:

(a) Given the context set out in Section I-C, paragraph 28, in the EM and taking into account that Part 4A of the Code applies to both audit and review engagements unless otherwise stated, do you believe there is a need to clarify the application of Section 405 with respect to group review engagements, including group interim reviews? If so, please explain why. Also explain what clarifications would be useful and whether they should be made inside or outside the Code.

Overall response: **No response**

Detailed comments (if any):

Click or tap here to enter text.

Non-compliance or Suspected Non-compliance with Laws and Regulations

E.1. Recognizing that ED-2410 requires the auditor to comply with relevant ethical requirements, including those related to independence, when performing an interim review engagement:

(b) Do you believe the application of the Code as described in Section I-C, paragraph 29, in the EM is clear when information concerning non-compliance or suspected non-compliance with laws and regulations comes to the auditor's attention when performing an interim review engagement? If not, please explain why. Also explain what clarifications would be useful and whether they should be made inside or outside the Code.

Overall response: **No response**

Detailed comments (if any):

Click or tap here to enter text.

This document was prepared by the Staff of the International Auditing and Assurance Standards Board (IAASB).

The objective of the IAASB is to serve the public interest by setting high-quality auditing, assurance, and other related services standards and by facilitating the convergence of international and national auditing and assurance standards, thereby enhancing the quality and consistency of practice throughout the world and strengthening public confidence in the global auditing and assurance profession.

The IAASB develops auditing and assurance standards and guidance under a shared standard-setting process involving the Public Interest Oversight Board, which oversees the activities of the IAASB, and the IAASB Stakeholder Advisory Council, which provides public interest input into the development of the standards and guidance.