



National Association of State Boards of Accountancy

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November 28, 2023

Auditing Standards Board
American Institute of Certified Public Accountants (AICPA)
1345 Avenue of the Americas
New York, NY 10105

Via email: CommentLetters@aicpa-cima.com

Re: Exposure Draft: Proposed Statement on Standards for Attestation Engagements – Amendments to the Attestation Standards for Consistency with the Issuance of AICPA Standards on Quality Management

Dear Members of the AICPA Auditing Standards Board (ASB):

The National Association of State Boards of Accountancy (NASBA) appreciates the opportunity to comment on the *Proposed Statement on Standards for Attestation Engagements – Amendments to the Attestation Standards for Consistency with the Issuance of AICPA Standards on Quality Management* (the Exposure Draft). 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. State Boards are charged by law with protecting the public.

In furtherance of that objective, NASBA offers the following comments on the specific requests for consideration as presented in the explanatory memorandum to the Exposure Draft.

Request for Comment 1:

Do respondents agree with the ASB’s approach to revising the attestation standards to conform to and promote consistency with SQMS Nos. 1 and 2, SAS No. 146, and SSARS No. 26?

NASBA agrees with the ASB’s approach to revising the attestation standards.

Request for Comment 2:

Do respondents believe that the proposed effective date of the SSAE is appropriate? If not, why?

NASBA believes that the proposed effective date of the SSAE is appropriate.

Request for Comment 3:

*Do respondents believe that the proposed revisions to paragraph .12 are appropriate? Respondents are specifically requested to provide their views on the proposed revisions to the definition of **other practitioner**.*

NASBA believes that the proposed revisions to paragraph .12 are appropriate. NASBA believes the proposed revisions to the definition of **other practitioner** are clear that an other practitioner is either deemed part of the engagement team or not and, if not, is referred to in the practitioner's report.

Request for Comment 4:

Do respondents agree that the preceding proposed new requirement paragraphs in AT-C section 105 are appropriate and sufficient to align with the quality management requirements for audit engagements? If not, respondents who believe that an included requirement is not appropriate are asked why they believe the requirement is not appropriate for an attestation engagement. If respondents believe that there are other changes that should be made to align with SQMS Nos. 1 and 2 and SAS No. 146, please specify those changes.

NASBA agrees that the proposed new requirement paragraphs in AT-C section 105 are appropriate and sufficient to align with the quality management requirements for audit engagements.

Request for Comment 5:

Do respondents agree with the proposed revisions to the requirements when an other practitioner is performing attestation procedures in connection with an attestation engagement?

NASBA agrees with the proposed revisions to the requirements when an other practitioner is performing attestation procedures in connection with an attestation engagement.

Request for Comment 6:

Do respondents agree that the proposed new requirement paragraph .39 is appropriate?

NASBA agrees that the proposed new requirement paragraph .39 is appropriate. NASBA agrees that the engagement partner should have the appropriate competence, sufficient to accept responsibility for the conclusions reached on the engagement.

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We appreciate the opportunity to comment on the Exposure Draft.

Very truly yours,

Handwritten signature of Stephanie M. Saunders in black ink.

Stephanie M. Saunders, CPA
NASBA Chair

Handwritten signature of Ken L. Bishop in black ink.

Ken L. Bishop
NASBA President and CEO