March 22, 2024

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

Via website:  www.iaasb.org


Dear Members and Staff of the IAASB:

The National Association of State Boards of Accountancy (NASBA) appreciates the opportunity to comment on the Proposed Narrow Scope Amendments to: International Standards on Quality Management; International Standards on Auditing; and International Standard on Review Engagements 2400 (Revised), Engagements to Review Historical Financial Statements, as a Result of the Revisions to the Definitions of Listed Entity and Public Interest Entity in the IESBA Code (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. 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.

NASBA agrees with the new requirement and application material in ISRE 2400 (Revised) to provide transparency in the practitioner’s review report about the relevant ethical requirements for independence applied for certain entities, such as the independence requirements for PIEs in the IESBA Code.

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We appreciate the opportunity to comment on the Exposure Draft.
Very truly yours,

Stephanie M. Saunders, CPA
NASBA Chair

Ken L. Bishop
NASBA President and CEO