

COMMENTARY

Auditing Standards Committee Comment Letter PCAOB Rulemaking Docket Matter No. 026: Proposed Auditing Standards Related to the Auditor's Assessment of and Response to Risk and Conforming Amendments to PCAOB Standards

Committee Members:

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Edward F. O'Donnell, Susan Parker, and Sandra W. Shelton

INTRODUCTION

The Auditing Standards Committee of the Auditing Section of the American Accounting Association is pleased to provide comments on the *PCAOB Rulemaking Docket Matter No. 026: Proposed Auditing Standards Related to the Auditor's Assessment of and Response to Risk and Conforming Amendments to PCAOB Standards*. (Please see http://www.pcaobus.org/Rules/Docket_026/2008-10-21_Release_No_2008-006.pdf for the full text of PCAOB Release No. 2008–006.) We very much appreciate the opportunity to provide input.

The views expressed below are those of the members of the Auditing Standards Committee and do not reflect an official position of the American Accounting Association. In addition, the comments reflect the overall consensus view of the Committee, not necessarily the views of every individual member. We hope that the following comments and suggestions are helpful and will assist in finalizing the proposed guidance.

GENERAL COMMENTS

The Committee commends the PCAOB ("the Board") for generally maintaining consistency with International Standards on Auditing (ISAs) in developing these risk assessment standards. We believe that convergence with international standards is desirable. It would be preferable to have one set of primary standards based on ISAs, with PCAOB auditing standards for requirements unique to U.S. registered securities. Until this level of convergence is possible, the approach taken in these standards appears to be the best option. The Committee also believes that the focus on the iterative nature of the audit and the continued recognition of differences in approach that depend on the size and complexity of the client and the engagement are positive

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The Auditors Responsibility For Assessing Control Risk Proposed Statement On Auditing Standards

**United States. Congress. House.
Committee on Energy and Commerce**

The Auditors Responsibility For Assessing Control Risk Proposed Statement On Auditing Standards:

Proposed Statement on Auditing Standards American Institute of Certified Public Accountants. Auditing Standards Board,1987 **PCAOB Standards and Related Rules: 2019** AICPA,2020-03-10 Auditors of public companies opinions of the accuracy of a financial statement matters for the health of the company are important This title is a must have for practitioners it includes two new auditing standards Auditing Accounting Estimates Including Fair Value Measurements AS 2501 and Using the Work of an Auditor Engaged Specialist AS 1210 This guides also includes related amendments to other auditing sections recently issued staff guidance on these topics and staff guidance on critical audit matters Government auditing standards Amendment no. 2, auditor communication , **Semi-annual Report to Congress** United States. Department of Education. Office of Inspector General,1981 *PCAOB Standards and Related Rules* AICPA,2018-02-13 Pursuant to PCAOB Release No 2017 001 The Auditor s Report on an Audit of Financial Statements When the Auditor Expresses an Unqualified Opinion and Related Amendments to PCAOB Standards dated June 1 2017 the PCAOB adopted a new auditor reporting standard and related amendments that will require the auditor to provide new information about the audit and make the auditor s report more informative and relevant to investors and other financial statement users The standard and related amendments were subsequently approved by the SEC on October 23 2017 and are effective as of audits of fiscal years ending on or after December 15 2017 except for the Critical Audit Matters section of the standard and related amendments which have a phased effective date This 2018 edition of the AICPA s PCAOB Standards and Related Rules includes the newly approved standard The Auditor s Report on an Audit of Financial Statements When the Auditor Expresses an Unqualified Opinion AS 3101 In addition this title also features updated staff guidance included a new question and answers section updated guidance for firms filing the new Form AP and a new Staff Audit Practice Alert to assist auditors in applying PCAOB standards when auditing companies implementation of the new FASB revenue accounting standard

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