

## 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:

Randal J. Elder, Lawrence J. Abbott, James L. Biersteker, Steven Firer, Thomas M. Kozlowski,  
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](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.

# The Auditors Consideration Of Uncertainties Proposed Statement On Auditing Standards

**Patrick R. Delaney,O. Ray Whittington**

## **The Auditors Consideration Of Uncertainties Proposed Statement On Auditing Standards:**

**Proposed Statement on Auditing Standards** American Institute of Certified Public Accountants. Auditing Standards Board,1987   **Semi-annual Report to Congress** United States. Department of Education. Office of Inspector General,1981   *Semi-annual Report* United States. Department of Education. Office of Inspector General,1985

*Intermediate Accounting* Donald E. Kieso,Jerry J. Weygandt,Terry D. Warfield,2019-04-02 Intermediate Accounting 17th Edition is written by industry thought leaders Kieso Weygandt and Warfield and is developed around one simple proposition create great accountants Upholding industry standards this edition incorporates new data analytics content and up to date coverage of leases revenue recognition financial instruments and US GAAP IFRS While maintaining its reputation for accuracy comprehensiveness and accessibility Intermediate Accounting drives results by helping students build professional competencies through reliable problem material

### **Audit Risk Alert: General Accounting and Auditing Developments**

**2018/19** AICPA,2018-11-05 Containing descriptions of all recent auditing accounting and regulatory developments this 2018 alert will ensure that accountants have a robust understanding of the business economic and regulatory environments in which they and their clients operate In addition accountants will gain a full understanding of emerging practice issues with targeted analysis of new developments and how they may affect their engagements including Recent Economic Trends Recent Legislative and PCAOB Developments Developments in Peer Review Recent Ethics Interpretations This useful resource also contains new accounting and auditing guidance related Derivatives and Hedging Service Concession Agreements Discontinued Operations Stock Compensation

### **Wiley The Complete Guide to Auditing Standards, and**

**Other Professional Standards for Accountants 2009** Nick A. Dauber,2009-04-06 This practical and effective how to guide helps auditors and CPAs apply and comply with authoritative auditing standards It explains the standards and their requirements fully using technical terminology only when necessary

### *Private Litigation Under the Federal Securities Laws*

United States. Congress. Senate. Committee on Banking, Housing, and Urban Affairs. Subcommittee on Securities,1994

*Audit Reporting for Going Concern Uncertainty* Sandro Brunelli,2018-01-30 This book employs a narrative analytical approach to explore all aspects of the debate surrounding auditor reporting on going concern uncertainty worldwide In depth analysis of significant academic studies and of regulatory perspectives is combined with an illuminating empirical study in the Italian context The book opens by discussing the assessment of going concern for accounting and auditing purposes It is examined how going concern is considered in the FASB and IASB accounting standards and how auditors in the PCAOB and IAASB environments should verify its presence in financial statements and report on it in the audit report Accounting and auditing in relation to going concern in other jurisdictions are also addressed Research into the determinants accuracy and consequences of going concern opinions GCO is then thoroughly reviewed with separate examination of studies and trends in the United States Europe and the rest of the world In the third part of the book interesting evidence from the Italian Stock

Market including investor reactions to GCOs during the period 2008-2014 is presented and evaluated. The book will be of interest to academics, regulators and practitioners alike. *Not-For-Profit Organization Audits with Single Audits (2007-2008)* Warren Ruppel, 2007-06 CCH's Not for Profit Organization Audits with Single Audits combines into one comprehensive, easy-to-use guide everything an auditor needs to perform audits of financial statements, audits in accordance with Government Auditing Standards and single audits in accordance with Office of Management and Budget OMB Circular A-133. Comprehensive coverage of the relevant technical literature is combined with user friendly advice based on actual experience resulting in a technically sound and extremely usable audit guide.

**The Accounting Profession: Appendixes to Major Issues, Progress and Concerns** United States. General Accounting Office, 1996 *The Accounting Profession* United States. General Accounting Office, 1996 *Codification of Statements on Auditing Standards 2019* AICPA, 2019-07-03 This 2019 edition delivers the current Statements on Auditing Standards (SASs) and related interpretations in a codified format giving accountants the most up to date information they need to conduct successful audits and provide high quality services to their clients. Issued directly from the AICPA this authoritative guidance is essential to fully understand the requirements associated with an audit. This edition includes the following new standards: SAS No. 134 Auditor Reporting and Amendments Including Amendments Addressing Disclosures in the Audit of Financial Statements; SAS No. 135 Omnibus Statement on Auditing Standards 2019. SAS No. 134 is a suite of auditor reporting standards that includes a new AU-C section 701 Communicating Key Audit Matters in the Independent Auditor's Report and replaces AU-C sections 700, 705 and 706. SAS No. 134 which also amends various other AU-C sections addresses the auditor's responsibility to form an opinion on the financial statements and the form and content of the auditor's report issued because of an audit of financial statements. It also addresses the auditor's responsibilities and the form and content of the auditor's report when the auditor concludes that a modification to the auditor's opinion on the financial statements is necessary and when additional communications are necessary in the auditor's report. SAS No. 135 is intended to more closely align ASB guidance with the PCAOB's standards by primarily amending AU-C section 260 Communications With Those Charged With Governance; AU-C section 550 Related Parties; and AU-C section 240 Consideration of Fraud in a Financial Statement Audit. This codification is fully indexed and arranged by subject. The codified standards and related interpretations are vital to practitioners performing audits.

**Information Technology Control and Audit** Sandra Senft, Frederick Gallegos, Aleksandra Davis, 2016-04-19 The new edition of a bestseller Information Technology Control and Audit Fourth Edition provides a comprehensive and up to date overview of IT governance, controls, auditing, applications, systems development and operations. Aligned to and supporting the Control Objectives for Information and Related Technology (COBIT), it examines emerging trends.

**Textbook in Auditing Theory**, *Wiley Practitioner's Guide to GAAS 2011* Steven M. Bragg, 2010-12-01 The clearest, easiest to use guide to understanding GAAS 2011 on the market, fully updated. This latest resource to understanding GAAS addresses the toughest

part of the job identifying interpreting and applying the many audit attest review and compilation standards relevant to a particular engagement A brief identification of each SAS SSAE and SSARS with its effective date and tips on when to apply it A convenient and comprehensive glossary of official definitions which are usually scattered throughout a standard Behind the scenes explanations of the reasons for each pronouncement and brief explanations of the basic ideas of the section Concise listing and descriptions of each standard s specific mandate Easy to read capsule summary of interpretations plus selected AICPA practice alerts and advisories Helpful techniques for remaining compliant with each standard Examples and illustrations for testing internal controls The only GAAS reference organized according to practitioners actual use of the Statements on Auditing Standards SASs Wiley Practitioner s Guide to GAAS 2011 presents each statement individually explaining how the standards are related and offering guidance on the entire engagement process in the form of practice notes checklists questionnaires and real world examples that illustrate how the fundamental requirements of each section are applied

**Securities and Exchange Commission Report to Congress on the Accounting Profession and the Commission's Oversight Role** United States. Securities and Exchange Commission,1978      Wiley CPA Exam Review

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that gives you the resources you need to satisfy all of your requirements Book jacket      **The Accounting Profession**

Donald H. Chapin, Robert W. Gramling, 1996-12 Contains the individual recommendations made by the major study groups affecting the accounting profession from 1972-95 a list of experts on the subject of accounting copies of written comments received from the AICPA FASB the SEC on a draft of this report

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