December 9, 2014

Ms. Sharon Macey  
Audit and Attest Standards  
American Institute of Certified Public Accountants  
220 Leigh Farm Road  
Durham, North Carolina 27707-8110

Dear Ms. Macey:

We have reviewed the AICPA Auditing Standards Board’s (ASB) Exposure Draft (ED) of the proposed Statement on Standards for Attestation Engagements titled Reporting on an Examination of Controls at a Service Organization Relevant to User Entities’ Internal Control Over Financial Reporting: Clarification and Recodification and generally agree with the provisions in the exposure draft. We have provided our response to the issue for consideration and the questions in the ED below. We also endorse the views expressed by the National State Auditor’s Association in their response to the ED.

**Issue for Consideration:**

*Consider whether the revised structure of attestation standards facilitates understanding and implementation for practitioners.*

We agree that the revised structure of the clarified standards facilitates understanding and implementation for practitioners.

**Questions for Respondents:**

1. *Are the objectives of the practitioner in each of the chapters appropriate?*

   Yes, we considered the objectives as appropriate.

2. *Are the substantive and language changes to extant AT sections 801 made by the ED appropriate?*

   Yes, we consider the changes as appropriate; however, we support the National State Auditor Association’s suggested revision to paragraph 8.A63 to clarify the use of an internal auditor’s work.
3. Are there considerations for less complex entities and governmental entities that should be addressed in the exposure draft?

We share the concerns expressed by the National State Auditor’s Association regarding the disclosure of certain deficiencies of governmental information systems and support additional application and explanatory material to address their concerns.

We appreciate the opportunity to comment on this exposure draft. Should you have any questions or desire further details on our comments, please contact me or Craig M. Murray, C.P.A., Director of Professional Practice.

Sincerely,

Doug Ringler
Auditor General

Via email