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Mr. Mike Glynn  
AICPA  
Via email to [mike.glynn@aicpa-cima.com](mailto:mike.glynn@aicpa-cima.com)

Re: Exposure Draft –The Auditor’s Responsibilities Related to Other Information Included in Annual Reports

Dear Mike:

I generally support the required procedures in this proposed SAS. However, there are other matters that the Board should address to improve the standard:

### **Reporting**

The ED (par 23e i) requires the auditor’s report to contain a statement that the auditor has nothing to report. This will not be understood by the average reader, who probably will think the auditor is hiding something. Nothing to report sounds like “I have nothing to say” or “I take the Fifth Amendment”. The auditor’s report contains 3 paragraphs about other information, so the auditor must be reporting something. I believe the auditor is reporting that he read the other information and noted no material inconsistencies with the financial statements and no appearances of material misstatement of the financial statements. Why not just say so in plain English?

The report states the auditor’s responsibilities regarding the other information, but does not state that the auditor met those responsibilities. The reader wants to know what the auditor did and whether he found what he was looking for, not what he was supposed to do. Here is my suggestion for the third paragraph of a report section on other information. Similar changes should be made to the other examples.

### **Example wording for other information**

(First two paragraphs same as in ED).

We read the other information. In our reading, we noted no material inconsistencies with the financial statements or the knowledge we obtained in our audit and no appearances of material misstatement of the financial statements.

## **Other Information other than in Annual Reports**

The ED assumes there will be other information only in connection with annual reports. However, there may be other situations where auditors are associated with other information and auditors need guidance for those situations. For example, semiannual reports containing audited financial statements, other information in a sustainability report (which requires guidance in the attestation standards). Since the standards and guidance for those situations would be similar to what is in the ED, the ED and its title should be modified to note the applicability to other situations.

Sincerely,

*Abe*

Abraham D. Akresh, CPA, CGFM