



# OAG

Office of the Auditor General

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**Doug A. Ringler, CPA, CIA**  
Auditor General

May 14, 2018

Mr. Mike Glynn  
Senior Technical Manager  
American Institute of Certified Public Accountants  
1211 Avenue of the Americas  
New York, NY 10036-8775

Dear Mr. Glynn:

We have reviewed the AICPA Auditing Standards Board's exposure draft (ED) of proposed statements on auditing standards entitled *The Auditor's Responsibilities Relating to Other Information Included in Annual Reports*. Overall we considered the exposure draft as sufficiently detailed to properly instruct an auditor of the procedures to perform regarding other information. We had no suggested revisions. Our responses to the issues specifically requested by the Board are as follows:

#### **Specific Request for Comment 1**

*Do the proposed revisions clarify the scope of documents required to be subjected to the auditor's procedures? If you believe additional revisions or guidance is necessary, please be specific and provide reasons why additional revisions or guidance is necessary.*

Yes, we consider the definition of annual report and the exclusions of supplemental information and required supplemental information provide sufficient clarity to apply the proposed standard.

#### **Specific Request for Comment 2**

*Does the proposed requirement for the auditor to determine, through discussion with management, and obtain management's written acknowledgment regarding, which document or documents make up the annual report, and the entity's planned manner and timing of the issuance of such documents appropriately achieve the intent of ensuring that both the auditor and management understand the documents that are considered to constitute the entity's annual report and therefore are subject to the auditor's procedures required by the proposed SAS?*

Yes, we consider the proposed requirement as sufficient to ensure that both the auditor and management understand which document constitutes the entity's annual report.

#### **Specific Request for Comment 3**

*Will the work effort required by the proposed standard, in view of the proposed definitions, result in an improvement of the auditor's understanding of the auditor's responsibility for other information and, as a result, enable the auditor to perform a more thorough reading and challenging of statements included in (or omitted from) the other information that are*

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*inconsistent with the audited financial statements or the auditor's knowledge obtained as part of the audit?*

We consider the wording as sufficient to enable the auditor to read the other information and properly inform readers of inconsistencies, misstatements of fact, or omissions.

*Does the proposed SAS provide adequate guidance with respect to the auditor's consideration of omitted or obscured information?*

Yes, the proposed wording is sufficient to inform the auditor of their responsibility regarding omissions or obscured information.

**Specific Request for Comment 4**

*Does the proposed SAS provide adequate guidance for group auditors when a group auditor decides to make reference to a component auditor in the auditor's report on the group financial statements?*

Yes we consider the wording as appropriate and have no suggested revisions.

**Specific Request for Comment 5**

*Does the proposed requirement for the auditor to include a separate section in the auditor's report addressing other information appropriately convey the nature and extent of the auditor's consideration of other information without inappropriately implying that the auditor has obtained assurance on or is expressing an opinion or conclusion on the other information?*

Yes, we consider the proposed wording as appropriately conveying the auditor's responsibility regarding other information and the fact that the auditor is not providing any assurance on the information.

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, CPA, CIA, Director of Professional Practice.

Sincerely,



Doug Ringler  
Auditor General

Via email