



April 26, 2018

Mike Glynn
AICPA Auditing Standards Board
1211 Avenue of the Americas
New York, NY 10036-8775

Via e-mail: mike.glynn@aicpa-cima.com

Re: Proposed Statement on Auditing Standards, *The Auditor's Responsibilities Relating to Other Information Included in Annual Reports*

Dear Mr. Glynn:

The Accounting Principles and Auditing Standards Committee (the Committee) of the Florida Institute of Certified Public Accountants (FICPA) respectfully submits its comments on the referenced proposal. The Committee is a technical committee of the FICPA and has reviewed and discussed the above referenced Exposure Draft of Proposed Statement on Auditing Standards issued by the Auditing Standards Board. The FICPA has more than 20,000 members, with its membership comprised primarily of CPAs in public practice and industry. The Committee is comprised of approximately 23 members, of whom 48% are from local or regional firms, 26% are from large multi-office firms, 13% are sole practitioners, 9% are in international firms, and 4% are in education. The Committee has the following comments related to the issues posed:

1. We agree that the proposed revisions clarify the scope of documents required to be subjected to the auditor's procedures, specifically other information included in the annual report or similar report with sufficient examples of those documents that do not fall within the scope of the proposed revision. We do not believe additional guidance or revisions is necessary.
2. The Committee agrees the proposed requirements appropriately achieves the intent of ensuring both the auditor and management's understanding of 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, by way of requiring written representation from management not previously required.
3. We believe the proposed definitions of other information will result in an improvement of the auditor's understanding of their responsibility to this information, providing transparency between the auditor and management, however do not believe it will enable the auditor to perform a more thorough reading and challenging of the statements included in other information than what is currently required.

The proposed standard does not require the auditor to search for omitted information or for the completeness of the other information and therefore provides more than adequate guidance with respect to the auditor's consideration of omitted or obscured information.

4. The Committee concurs there is adequate guidance for group auditors, in view of the fact that the group auditor's knowledge does not extend beyond that obtained during the audit of the group financial statements.
5. We agree the requirement of including a separate section in the auditor's report addressing other information properly discloses the nature and extent of the auditor's consideration of other information by outlining the scope of the auditor's work without inappropriate implications as that effect.

Although the Committee agrees with substantially all of the proposed changes to the standard, we however take exception to the requirement to include a separate section in the auditor's report. It is our opinion it should remain optional depending upon the facts and circumstances and left up to the auditor's judgment. We believe the added section while not expanding the scope of the engagement, places additional unwarranted burden on the auditor and believe transparency is accomplished when applicable, by way of including a separate section if warranted.

The Committee appreciates this opportunity to respond to the proposed statement on auditing standards. Members of the Committee are available to discuss any questions or concerns raised by this response.

Respectfully submitted,



Steve Bierbrunner, CPA
Chair, FICPA Accounting Principles and Auditing Standards Committee

Committee members coordinating this response:

Donald K. Hulslander, CPA
Allan Franklin, CPA