October 11, 2018

AICPA Auditing Standards Board
Attn: Sherry Hazel
sherry.hazel@aicpa-cima.com

Dear Sherry,

The Michigan Association of CPAs’ (MICPA) Accounting & Auditing Standards Task Force is comprised of member CPAs whose main objective is to review discussion papers and exposure drafts issued by various standard setting boards on behalf of our more than 18,000 members across the state.

The comments offered below on “Proposed Statement on Standards for Attestation Engagements, Revisions to Statement on Standards for Attestation Engagements No. 18, Attestation Standards: Clarification and Recodification” while reflecting the thoughts of the members of this particular Task Force are developed with the entire Michigan CPA community in mind. It is our hope that you find them both insightful and helpful as you work to complete this project.

**General Comments**

In discussions with our members, we are generally very supportive of the new standard. AUPs are very common in the industry and we are very supportive of the changes.

In particular, the elimination of the written assertion adds efficiency without reducing the value. In addition, we are also supportive of all changes that help to converge the international and U.S. standards. As the business world becomes more global, it is helpful and effective to reduce differences where appropriate.

We applaud the changes on the engagement letter. Current practice involves a significant effort so effectively when we have finalized the engagement letter, the report is also complete. In addition, as CPAs, we are typically more effective at developing the required procedures.

We also believe that the general user provision will be helpful.

We did have one group note that while the proposed changes add flexibility in performing AUP, the proposed amendments are too extensive and a level of transparency is lost. There could be potential confusion about how is responsible for the procedures performed and users of the report may interpret that the accountant is providing some level of assurance. This group believes that the statement, by the accountant that they make no representation regarding the sufficiency of the report is valuable and should be permitted to be included, at the option of the accountant.

We have no additional specific comments for sections 2 and 3.
If the AICPA Accounting and Review Services Committee would like to contact the MICPA’s Accounting & Auditing Standards Task Force in regard to these comments, please direct any inquiries to the MICPA Staff Liaison to the Task Force, Shane Barry at (248) 267-3710 or via e-mail at sbarry@micpa.org.

Regards,

Cathy McNamara
Chair, MICPA Accounting & Auditing Standards Task Force
BDO