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*Comptroller*

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Audit and Attest Standards  
American Institute of Certified Public Accountants  
1211 Avenue of the Americas  
New York, NY 10036-8775

To Whom it May Concern:

On behalf of the Tennessee Department of Audit, we thank the Auditing Standards Board (ASB) for the opportunity to comment on the Exposure Draft (ED), *Inquiries of The Predecessor Auditor Regarding Fraud and Noncompliance with Laws and Regulations*. We generally agree with the board's proposals. Our responses to the ASB's specific questions follow.

### **Request for Comment**

1. Does the respondent agree with the ASB's determination that it is appropriate to retain the requirement for the auditor, prior to accepting an initial audit, including a reaudit engagement, to request management to authorize the predecessor auditor to respond fully to the auditor's inquiries? If not, why not, and how would the respondent revise the requirement (for example, by making the procurement of management's agreement a precondition for the auditor to accept the engagement or requiring the auditor to communicate with the predecessor auditor without management's authorization)?

**We agree with the ASB's determination to retain the requirement for the auditor to request management to authorize the predecessor auditor to respond fully to the auditor's inquiries. The requirement is important because a refusal of the request or a management limitation would inform the auditor of potential concerns that could influence the engagement acceptance process.**

2. Are the proposed requirements appropriate and complete, including whether it is appropriate to continue to provide an exception that permits the predecessor auditor to decline to respond to the auditor's inquiries due to impending, threatened, or potential litigation; disciplinary proceedings; or other unusual circumstances? If not, please suggest specific revisions to the proposals.

**We believe the proposed ED requirements are appropriate and complete, including providing an exception in ¶13 permitting the predecessor auditor to decline to respond to the auditor’s inquiries due to impending, threatened, or potential litigation; disciplinary proceedings; or other unusual circumstances. We also agree it is appropriate for this paragraph to emphasize that “such circumstances are expected to be rare.”**

3. Is the proposed requirement appropriate and complete? If not, please suggest specific revisions.

**We agree that the proposed documentation requirement in ¶15 is appropriate and complete.**

4. Are respondents supportive of the proposed effective date? If you are not supportive, please provide reasons for your response.

**We agree with the proposed effective date.**

Should you have questions or need clarification on any of our comments, please contact Gerry Boaz (615) 747-5262 ([Gerry.Boaz@cot.tn.gov](mailto:Gerry.Boaz@cot.tn.gov)) or Jerry Durham ([Jerry.Durham@cot.tn.gov](mailto:Jerry.Durham@cot.tn.gov)) at (615) 401-7951.

Sincerely,



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