January 31, 2020

Ms. Sherry Hazel
American Institute of Certified Public Accountants
1345 Avenue of the Americas, 27th Floor
New York, NY 10105

Via Email: Sherry.Hazel@aicpa-cima.com

Re: The Auditing Standards Board’s Proposed Strategy and Work Plan

Dear Ms. Hazel:

We appreciate the opportunity to comment on the Auditing Standards Board’s Proposed Strategy and Work Plan referenced above. Our comments will be in the form of responses to specific questions included in the Proposed Strategy and Work Plan.

Request for Comments

Question 2: Whether you agree with “Our strategic initiatives” and “Our strategic actions.”

Regarding “Initiative B: Enhance communications with our stakeholders” and its related “Strategic actions” we recommend that the Board consider forming diverse practitioner-based expert advisory groups corresponding to each set of professional standards in an effort to create continuous feedback loops. Practitioners are uniquely positioned to provide the Board with timely and relevant feedback regarding the professional standards that they utilize on a daily basis to serve their clients. In addition to providing continuous feedback to the Board, these practitioner-based expert advisory groups could also be utilized to perform post-implementation reviews of recently issued professional standards. We believe that the formation of such advisory groups would result in more efficient and effective professional standards and help reduce the number of practical implementation challenges faced by practitioners. As a part of the formation of these advisory groups, we would also recommend that the Board develop electronic feedback tools to increase practitioners’ ability to quickly and easily provide feedback to the Board (e.g. cloud-based tools that practitioners can access and with one or two clicks provide their feedback to the Board, possibly similar to the FASB’s Accounting Standards Codification feedback tool which allows users to provide paragraph-level feedback directly to the FASB with one or two clicks).

Regarding “Initiative D: Keep our standards relevant in a changing environment” and its related “Strategic actions,” one of “Initiative D’s” strategic actions states, “We will do the following: Determine whether guidance is needed to promote or support the use of emerging technologies by practitioners and determine the best methods to provide such guidance.” We strongly support this initiative and its related strategic actions, but want to stress to the Board that this guidance has to be practical and executable otherwise future advances in technology will not result in significant increases in audit and attestation quality, efficiency and effectiveness.
We appreciate the opportunity to provide the above comments and are available for further discussion with the Board if that would be useful to the process. Should you wish to discuss any of these comments, please contact David Johnson, Professional Practice Group Partner, at david.johnson@bakertilly.com or +1 (608) 240 2422.

Sincerely,

BAKER TILLY
David Johnson, Professional Practice Group Partner