

January 25, 2022

AICPA
1345 Avenue of the Americas
27th Floor
New York, NY 10105

By e-mail: CommentLetters@aicpa-cima.com

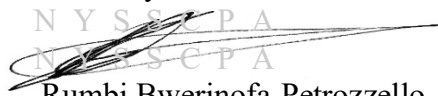
Re: Proposed Statement on Standards for Accounting and Review Services—*Quality Management for an Engagement Performed in Accordance With Statements on Standards for Accounting and Review Services*

(November 3, 2021)

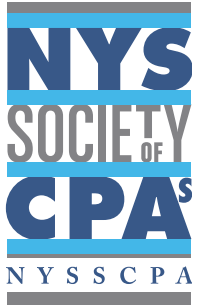
The New York State Society of Certified Public Accountants (NYSSCPA), representing more than 21,000 CPAs in public practice, industry, government and education, welcomes the opportunity to comment on the above-captioned exposure draft.

The NYSSCPA's Accounting and Review Services Committee deliberated the exposure draft and prepared the attached comments. If you would like additional discussion with us, please contact Sharon Brenner, Chair of the Accounting and Review Services Committee, at (516) 542-6300, or Ernest J. Markezin, NYSSCPA staff, at (212) 719-8303.

Sincerely,


Rumbi Bwerinofa-Petrozzello
President

Attachment



**NEW YORK STATE SOCIETY OF
CERTIFIED PUBLIC ACCOUNTANTS**

COMMENTS ON

***PROPOSED STATEMENT ON STANDARDS FOR ACCOUNTING AND REVIEW
SERVICES—QUALITY MANAGEMENT FOR AN ENGAGEMENT PERFORMED IN
ACCORDANCE WITH STATEMENTS ON STANDARDS FOR ACCOUNTING AND
REVIEW SERVICES (November 3, 2021)***

January 25, 2022

Principal Drafters

**Lenore C. Sanchez
Ross A. Trapani
Nick Tsoukaris**

NYSSCPA 2021–2022 Board of Directors

Rumbidzai Bwerinofa-Petrozzello, <i>President</i>	Edward L. Arcara	John A. Mourer
Lynne M. Fuentes, <i>President-Elect</i>	Steven K. Baierlein	Lisa A. Mrkall
Thomas S. Pirro, <i>Secretary/Treasurer</i>	Ramona Cedeno	Maria L. Petrollese
Kelly Capron, <i>Vice President</i>	Margaret Chen	Jennifer Pickett
Kimberly G. Johnson, <i>Vice President</i>	William H. Dresnack	Alexander Resnick
Kevin Matz, <i>Vice President</i>	Zachary Gordon	Ronald F. Ries
Patricia A. McGrath, <i>Vice President</i>	Orumé A. Hays	Sharon Sica-Costanzo
David G. Young, <i>Vice President</i>	Elliot L. Hendler	Denise M. Stefano
Joanne S. Barry, <i>ex officio</i>	William C. Huether	Jennifer Stone
	John B. Huttlinger	Maria E. Suppa
	Michael R. Koeppl	A’Isha Torrence
	Katelyn Kogan	Mark M. Ulrich
	Edward N. Lee	Liren Wei
	Philip J. London	Charles J. Weintraub
	Shmueli Milecki	Craig A. Zellar
	Michael E. Milisits	

NYSSCPA 2021–2022 Accounting and Auditing Oversight Committee

Margaret A. Wood, <i>Chair</i>	Jeannette S. Buttler	Renee Mikalopas-Cassidy
Diane L. Jules, <i>Vice Chair</i>	Richard C. Jones	Sean C. Prince
Jennifer L. Biundo	Bonnie S. Mann-Falk	Robert M. Rollmann
Sharon Brenner	Ashley E. Mayer	George I. Victor

NYSSCPA 2021–2022 Accounting and Review Services Committee

Sharon Brenner, <i>Chair</i>	Stuart Kamelhar	Lenore Sanchez
Kenneth J. Gralak, <i>Vice Chair</i>	Kieron Ludde	Robert L. Schindler
Michael J. Aroyo	Patricia A. McGrath	Eric M. Sherb
Dawn M. Bergen	Michael Meilak	Akshay T. Shrimanker
Joseph A. Caplan	Victoria L. Pitkin	Eric Skoglund
Joshua Cohen	Nicholas Prahalis	Ira M. Talbi
Joseph Davi	Clifford J. Romain	Ross A. Trapani
Jeffrey S. Gittler	John M. Sacco	Nick Tsoukaris
Michael P. Glynn*	Michael B. Sackowitz	Chaim Ungar
Haren K. Gosar	Aderogba A. Salami	

* - recused

NYSSCPA Staff

Keith Lazarus
Ernest J. Markezin

New York State Society of Certified Public Accountants

Comments on

Proposed Statement on Standards for Accounting and Review Services—*Quality Management for an Engagement Performed in Accordance With Statements on Standards for Accounting and Review Services*

(November 3, 2021)

The New York State Society of Certified Public Accountants (NYSSCPA) welcomes the opportunity to provide comments on the AICPA’s Accounting and Review Services Committee (ARSC) exposure draft of proposed Statement on Standards for Accounting and Review Services, *Quality Management for an Engagement Performed in Accordance with Statements on Standards for Accounting and Review Services*.

We appreciate the hard work and diligence of the ARSC in developing the proposed revisions contained in the exposure draft. We support the exposure draft and offer below our responses to the Requests for Specific Comment.

Request for Specific Comment #1: Do you agree that the proposed revisions to AR-C sections 60 and 90, excluding the amendment to paragraph .16 of AR-C section 90, result in the SSARSs being appropriately consistent with the proposed auditing standards?

If you believe that the proposed revisions do not result in appropriate consistency, please provide detailed revisions that you think should be made to the SSARSs to ensure appropriate consistency with the proposed auditing standards.

Response: We agree that the proposed revisions to AR-C sections 60 and 90 result in the SSARSs being appropriately consistent with the proposed auditing standards. We note a proper emphasis, consistent with the auditing standards, on partner oversight and overall responsibility for ensuring adequate timing and resources for performing a quality engagement. Further, the substantive revisions regarding quality management, specifically in 60.24, is appropriate. We also believe the language removed, separate from the amendment to paragraph .16 of AR-C section 90, is appropriate.

Request for Specific Comment #2: Do you agree that the effective date of the proposed SSARS should be consistent with the effective date of the proposed SAS?

If you do not agree, please provide the reasons why you believe the effective date of the proposed SSARS should not be consistent with the effective date of the auditing standard.

Response: We support that the effective date of the proposed SSARS should be consistent with the effective date of the proposed SAS. This would help to eliminate any

misunderstanding within the profession or by the public, and provides for effective implementation.

Request for Specific Comment #3: Do you agree with the proposed revision to paragraph .16 of AR-C section 90?

If you do not agree, please indicate what revisions you believe should be made to the SSARs so that the requirements are consistent.

Response: We agree with the wording of the proposed revision to paragraph .16 of AR-C section 90. The deletion of “prior to performing the engagement” eliminates uncertainty as to at which point “prior to performing the engagement” is, as it relates to planning work such as the determination of expectations, preliminary research related to the industry and other procedures performed before the start of “fieldwork.” Further, the existing requirement is too restrictive and puts limitations on the accountant’s judgement. Additionally, since paragraph .16 of AR-C section 90 includes the word “should” it further supports eliminating the phrase since it is not indicated as required.

However, if the ARSC does not strike the language from paragraph .16 of AR-C section 90, we suggest the consideration of a more descriptive definition of “prior to performing the engagement” and indicate at which point in time “prior to” is intended to be.

Request for Specific Comment #4: Do you agree with the proposed amendment to paragraph .16 being effective upon issuance?

If you do not agree, please provide an effective date that you consider more appropriate and your reasons for your proposal.

Response: We agree that the proposed amendment to paragraph .16 should be effective upon issuance because we believe the deletion of the phrase “prior to performing the engagement” will not result in any practice issues. Furthermore, we agree with the ARSC that the proposed revision is a technical correction of the literature, adding to our support of the amendment being effective upon issuance.