

January 31, 2022

AICPA Accounting and Review Services Committee
1345 Avenue of the Americas, 27th Floor
New York, NY 10105

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

Dear Members of the Committee and Staff:

Mazars USA LLP (“Mazars”) welcomes the opportunity to comment on the Proposed Statement on Accounting and Review Services – *Quality Management for an Engagement Performed in Accordance with Statements on Standards for Accounting and Review Services*.

Currently, Mazars USA has over 100 partners and 800 professionals across the United States and is an independent member firm of the Mazars Group, an organization with 1,100 partners and 26,000 professionals in over 90 countries around the world, and a member of Praxity, a global alliance of independent firms. As a member of an international network, we strive for continuous improvement by collaborating with our other member firms to set high standards of quality throughout the Mazars Group and tailoring our policies and procedures to comply with the standards established by the American Institute of Certified Public Accountants, the International Auditing and Assurance Standards Board and the Public Company Accounting Oversight Board.

Our views on the Exposure Draft are driven by our position in the U.S. marketplace as a medium sized public accounting firm servicing mostly small to mid-size public and private businesses in a variety of industries, and as a member firm in a global network. Mazars supports the Accounting and Review Services Committee’s decision to consider the impact of the recently exposed proposed statements of the AICPA Auditing Standards Board concerning quality management¹ with a focus on enhancing consistency between relevant standards.

Requests 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, excluding the amendment to paragraph .16 of AR-C section 90, result in the SSARSs being appropriately consistent with the proposed auditing standards.

2. Do you agree that the effective date of the proposed SSARS should be consistent with the effective date of the proposed SAS?

¹ Proposed Statements on Quality Management Standards (SQMSs) *Quality Management: A Firm’s System of Quality Management and Engagement Quality Reviews*
Proposed Statement on Auditing Standards (SAS) *Quality Management for an Engagement Conducted in Accordance with Generally Accepted Auditing Standards*

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

Response: We agree that the effective date of the proposed SSARS should be consistent with the effective date of the proposed SAS. We believe that having the same effective date for the proposed SSARS standard and the auditing standards would be more efficient and enhance quality.

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 SSARSs so that the requirements are consistent.

Response: We agree with the proposed revision to paragraph .16 of AR-C section 90. While we believe that obtaining such agreement prior to performing the engagement is a best practice, we do not believe that it should be a requirement in SSARS review engagements.

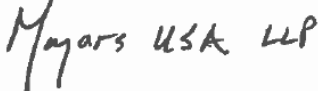
4. Do you agree with the proposed amendment to paragraph .16 being effective upon issuance?

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

Response: We agree with the decision to make the amendment to paragraph .16 effective upon issuance.

We would be pleased to discuss our comments with you at your convenience. Please direct any questions to George Parker, Partner, Quality & Risk Management, at (267) 532-4382 (george.parker@mazarsusa.com) or Soma Sinha, Senior Manager, Quality & Risk Management at (212) 375-6569 (soma.sinha@mazarsusa.com).

Very truly yours,



Mazars USA LLP