



National Association of State Boards of Accountancy

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December 17, 2021

Professional Ethics Executive Committee  
c/o Toni Lee-Andrews, Director  
American Institute of Certified Public Accountants  
1345 Avenue of the Americas  
New York, NY 10105

Via e-mail: [ethics-exposedraft@aicpa.org](mailto:ethics-exposedraft@aicpa.org)

**Re: Exposure Draft: Accounting Standards Implementation Services**

Dear Members and Staff of the AICPA Professional Ethics Executive Committee (PEEC):

The National Association of State Boards of Accountancy (NASBA) appreciates the opportunity to comment on the above-referenced Exposure Draft, *Accounting Standards Implementation Services* (the Exposure Draft). NASBA's mission is to enhance the effectiveness and advance the common interests of State Boards of Accountancy (State Boards) that regulate all Certified Public Accountants (CPAs) and their firms in the United States and its territories, which includes all audit, attest and other services provided by CPAs. State Boards are charged by law with protecting the public.

### **General Comments**

NASBA agrees that the proposed interpretation would be helpful to the membership who may be called upon to assist attest clients in implementing new accounting standards and offers the following comments and suggestions for the committee's consideration:

We observed that the proposed standard provides almost twice as many examples of permissible services versus impermissible services. As such, the appearance is that there may be an apparent bias towards the practitioner providing the services. We support quality examples to guide practitioners and recognize that the standards cannot provide an all-inclusive or, in this case, equivalent set of activities. However, the PEEC may want to challenge if there is an opportunity for more guidance for the impermissible services to overcome this appearance.

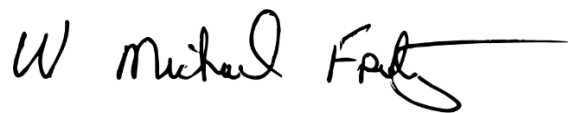
Given the complexity of new accounting standards, we also recommend that the interpretation emphasize the member's obligation to evaluate whether the attest client's designee has suitable skills, knowledge, and/or experience to oversee the implementation services.

*Do you agree with the need for a delayed effective date? Why or why not?*

We do not believe that the interpretation is overly complex and agree that the effective date of the interpretation should be 90 days after it appears in the *Journal of Accountancy*.

Again, we appreciate the opportunity to comment on the Exposure Draft.

Very truly yours,

Handwritten signature of W. Michael Fritz in black ink.

W. Michael Fritz  
NASBA Chair

Handwritten signature of Ken L. Bishop in black ink.

Ken L. Bishop  
NASBA President and CEO