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Professional Ethics Executive Committee  
American Institute of Certified Public Accountants (AICPA)  
220 Leigh Farm Road  
Durham, NC 27707

Via email: [Ethics-ExposureDraft@aicpa.org](mailto:Ethics-ExposureDraft@aicpa.org)

**Re: Comments on Exposure Draft, "Accounting Standards Implementation Services," AICPA Professional Ethics Division, September 20, 2021**

Dear Committee Members:

CliftonLarsonAllen LLP (CLA) appreciates the opportunity to comment on the September 20, 2021, AICPA Professional Ethics Executive Committee (PEEC) Exposure Draft (ED), which proposes a new Ethics Interpretation (ET), "Accounting Standards Implementation Services" (ET section 1.295.113). We understand that the purpose of the proposed interpretation is to provide guidance regarding assistance with clients' implementation of new accounting standards and the impacts on independence.

### **General Comments**

#### ***Recommended Definition or Example of a Discrete Tool***

Paragraph .02f refers to the discrete tool exception of the "Information Systems Services" interpretation (ET 1.295.145). CLA understands that PEEC is still working on nonauthoritative guidance regarding that interpretation. CLA continues to believe that the proposed nonauthoritative guidance should include a definition or examples as to what work product constitutes a discrete tool. Failure to provide such guidance may lead to inconsistent application of both the "Information Systems Services" and "Accounting Standards Implementation Services" interpretations.

#### ***Recommended Clarification of Implementation Team***

Paragraph .03a states that independence would be impaired if a member "leads any implementation team at the attest client." CLA assumes that this phrase is referring to an implementation team comprised of (or in the place of) the attest client's staff (versus the member's internal team comprised of the member's staff who may work alongside the attest client's implementation team), as such a service would be considered managing the client's project. CLA proposes that the phrase be revised as "leads any *client* implementation team ~~at the attest client.~~" to avoid any confusion.



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### **Request for Specific Comments**

If the PEEC proceeds with the proposed interpretation, we offer the following response to the request for comment in the ED regarding the effective date of “90 days after the interpretation appears in the *Journal of Accountancy*.”

**Response:** CLA believes that the effective date is appropriate.

\* \* \*

CLA appreciates the opportunity to review and offer our comments on the proposed interpretations. We would be pleased to discuss any questions that you or your staff may have regarding our comments.

Respectfully submitted,

A handwritten signature in cursive script that reads "CliftonLarsonAllen LLP".

**CliftonLarsonAllen LLP**