

December 11, 2021

Ms. Sherry Hazel  
American Institute of Certified Public Accountants  
1211 Avenue of the Americas  
New York, NY 10036-8775

Sent via email: [Ethics-Exposure Draft@aicpa.com](mailto:Ethics-Exposure Draft@aicpa.com)

### Professional Ethics Division

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

This letter is in response to the proposed exposure draft issued by the AICPA Professional Ethics Division dated September 20, 2021.

#### Background

415 Group is a firm of certified public accountants with eight partners (all who serve clients, in addition to their responsibilities of leading and managing the operations of the Firm) and approximately 70 other professionals and support staff. Our practice includes accounting and attest services in addition to tax and other non-attest services to organizations in a wide variety of industries.

We appreciate the opportunity to provide general feedback, including your request for feedback on a delay of the effective date.

#### General Comments

As the accounting standard setters for US GAAP and other bases of accounting promulgate various standards and other pronouncements, organizations of all sizes and complexities face the challenges of interpreting and implementing new and revised accounting and financial reporting requirements. It is common in most instances, that organizations of all sizes request various levels of input from their independent accountant and/or auditor as they interpret and implement the standard or pronouncement. Organizations of comparable size and complexity (even those within the same industry or sector) will have unique needs for input or assistance based on their individual facts and circumstances.

We recognize and agree, that Members must consider and evaluate threats to independence when providing any service to an attest client, including assistance with respect to the implementation of an accounting standard.

In our view, if a member applies the *General Requirements for Performing Nonattest Services* (1.295.040), such Member will be able to consider and evaluate threats to independence (including self-review and management participation), and structure an engagement with their client to assist with the implementation of accounting standards.

While situations with specific clients are unique (to the individual facts and services) the examples in paragraph .02 of this exposure draft are relevant examples of aspects of services provided during the implementation of an accounting standard or pronouncement that would allow a member to maintain its independence. Similarly, (and again with recognition that every client situation has its own unique facts and circumstances) the examples in paragraph .03 suggest that providing services in the manner

described, would indicate a level of management participation, and as a result, threats to independence would likely not be able to be reduced to an acceptable level.

This exposure draft, as written, provides appropriate guidance, is consistent with the *General Requirements for Performing Nonattest Services* and allows the Member to evaluate the individual facts and circumstances with individual clients without delineating absolute bright line prohibitions (that by their nature do not consider the individual facts and circumstances with individual clients). Accordingly, we support the exposure draft, as written, as it serves as an appropriate guide with appropriate considerations to Members as they provide the necessary input and assistance to their attest clients with accounting standard implementation services.

#### **Specific Feedback Requested with Respect to Effective Date**

As this exposure draft does not appear to require new or additional requirements to Members, nor does it include any prohibitions of services, we do not believe a delay in the effective date is necessary.

*Four-Fifteen Group*

Four Fifteen Group