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**From:** Mary McKinzie <MMcKinzie@incpas.org>  
**Sent:** Wednesday, December 15, 2021 8:39 AM  
**To:** Ethics-exposedraft  
**Subject:** Exposure Draft Proposed Revised Interpretation, Unpaid Fees dated September 20, 2021.

RE: Exposure Draft Proposed Revised Interpretation, Unpaid Fees dated September 20, 2021.

Dear Professional Ethics Executive Committee:

These comments are submitted on behalf of the Indiana CPA Society Ethics Committee (the Committee). These comments have no official status and do not represent the approval or disapproval of the exposure draft by the Indiana CPA Society or its Board of Directors.

The Committee is generally in agreement with the proposed revised interpretations. However, the Committee has a few comments:

- “Clearly insignificant” – the Committee wonders how members will interpret that wording. Could there be examples or added commentary to give some clarity?
- Ways to reduce threats. The examples given to reduce threats, items .04(a) to .04(f), appear to be standalone to a cold reader. So, if you do any of these, you have reduced the risk to an acceptable level? PEEC asks particularly this standalone question for .04(f). The Committee suggests that the reducing of threats is greater than just .04(f). Thus, the lead in to the listing should be made clear that each item is not standalone.
- Ways to reduce threats. Also, on items .04(a) to .04(f), the Committee suggests that items .04(a), .04(d), and .04(f) should not be included in the final interpretation. The issue is unpaid fees that are clearly significant. These three noted items taken either individually or in total, do not appear to relate to getting fees paid. Adding these items seems to be a way to get around the core issue – unpaid significant fees.

If you have questions or need further clarification of the Committee’s comments, please contact Jenny Norris, CPA, CGMA, CAE. Jenny can be reached at (317) 726-5021 or [jnorris@incpas.org](mailto:jnorris@incpas.org).

Thank you for the opportunity to comment.

**Mary McKinzie**  
Executive Administrator



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