



## Agenda Item 1A(3)

### Proposed Revisions to AU-C sections 725, 730, and 930 — Comment Letters Analysis

This file contains the responses received related to the request for comment specific to AU-C section 930 included in the exposure draft of the proposed SAS, *Amendments to AU-C sections 725, 730, 930, 935, and 940* and paragraph specific responses related to AU-C sections 725, 730, and 930.

#### Responses Specific to AU-C section 725

Respondent	Comment	Disposition
02 - Grant Thornton LLP	We agree with the proposed revisions to AU-C section 725 and do not have any suggested revisions or comments.	No edits made to proposed revisions to AU-C section 725.
09 - Office of the Washington State Auditor	We appreciate the portions of the report related to supplementary information and required supplementary information have each been reclassified from “an other matter paragraph” to “a separate section.”	

Summary of comments received on AU-C sections 725 730 and 930 – March 2020  
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Respondent	Comment	Disposition
14 – PricewaterhouseCoopers LLP	As a result of the proposed changes to AU-C section 725, the reference in Exhibit C, paragraph A19 of AU-C section 706 to paragraph 9 of AU-C section 725 should be removed.	Done.

**Responses Specific to AU-C section 730**

Respondent	Comment	Disposition
02 - Grant Thornton LLP	In considering the proposed revisions to AU-C 730, we considered the existing requirements along with those of AU-C 725. We question whether AU-C 730 should include a requirement for the auditor to indicate in its report that the required supplementary information is the responsibility of management. In instances where the auditor reports on both supplementary information and required	See discussion memorandum.

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Respondent	Comment	Disposition
	<p>supplementary information, we believe the lack of such a statement under one section in the auditor’s report could be confusing or misleading to readers. In the interest of clarity and consistency, we encourage the Board to consider adding to AU-C section 730 a requirement similar to that in AU-C 725. We’ve provided proposed language for the Board’s consideration in the accompanying appendix.</p>	
02 - Grant Thornton LLP	<p>As per our recommendation in the body of our letter, we propose that the following required element be added after paragraphs .08b and .09b and that the subsequent sub-bullets of each paragraph be renumbered: <b><i>A statement that the required supplementary information is the responsibility of management</i></b></p>	
02 - Grant Thornton LLP	<p>If the Board accepts our proposed addition above, the illustrative examples will require updating to include the statement regarding management’s responsibility.</p>	

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<b>Respondent</b>	<b>Comment</b>	<b>Disposition</b>
14 – PricewaterhouseCoopers LLP	As a result of the proposed changes to AU-C section 730, the reference in Exhibit C, paragraph A19 of AU-C section 706 to paragraph 7 of AU-C section 930 should be removed.	Done.

**AU-C section 930 – Paragraph Specific Responses**

Paragraph#	Respondent	Comment	Disposition
AU-C section 930 - paragraph .31	14 – PricewaterhouseCoopers LLP	We recommend that the requirements around items such as Title, Addressee, Opinion, etc. be listed in separate paragraphs (as compared to required elements within a single requirement) in order to maintain consistency with AU-C section 700.	ASB had determined to not include the requirements in separate paragraphs as the changes are intended to be conforming and adding a large number of new paragraphs (even if it is only a drafting convention) was determined to not be preferred.

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Paragraph#	Respondent	Comment	Disposition
AU-C section 930 - paragraph .31	14 – PricewaterhouseCoopers LLP	Even if the ASB declines to move the elements within paragraph 31 of AU-C section 930 to separate requirements to maintain consistency with AU-C section 700, we believe the language in paragraph 31 should be more closely aligned to AU-C section 700. For example, AU-C section 700.25a states, “Identify the entity whose financial statements have been audited,” whereas AU-C section 930.31c(i) has been changed from “identifies the entity whose interim financial information has been reviewed” (which is consistent with AU-C section 700) to “the name of the name of the entity whose interim financial information has been reviewed.” We note similar inconsistencies in AU-C section 930.31c(ii), AU-C section 930.31c(iii), AU-C section 930.31c(iv), and AU-C section 930.31c(v).	Pursuant to the ASB’s directive, the reporting elements are consistent with the elements in PCAOB AS 4105.

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Paragraph#	Respondent	Comment	Disposition
AU-C section 930 - paragraph .31a	02 - Grant Thornton LLP	<p>To align more closely with SAS 134, we recommend the following revision:</p> <p>A title that <del>includes the word independent to</del> clearly indicates that it is the report of an independent auditor.</p>	Agreed – note, the wording in the ED is consistent with SSARs.
AU-C section 930 - paragraph .31d	02 - Grant Thornton LLP	<p>For clarification and consistency, we recommend the following revision.</p> <p>A section, directly following the “Results of <i>Review of</i> Interim Financial Information” section, that includes the heading “Basis for Review Results,” and includes the following statements: ....</p>	Agreed.

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Paragraph#	Respondent	Comment	Disposition
AU-C section 930 - paragraph .31d	03 - Ernst & Young LLP	<p>We recommend the following edits to the description of the requirements of AU-C section 930, paragraph 31.d, to better align with the drafting convention used in AU-C section 700 (SAS No. 134):</p> <p>d. A section, directly following the “Results of Interim Financial Information” section, that includes the heading “Basis for Review Results,” and <del>includes</del> <b>does</b> the following <del>statements</del>: (Ref: par. .A50)</p> <p>i. <b>States that</b> <del>the</del> review was conducted in accordance with <b>generally accepted</b> auditing standards <b>applicable to reviews of interim financial information</b> <del>generally accepted</del> <b>and identifies</b> <del>in</del> the United States of America <b>as the country of origin of those standards</b> <del>applicable to reviews of interim financial information</del>. (Ref: par. .A51)</p>	Agreed.

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Paragraph#	Respondent	Comment	Disposition
		<p>ii. <i>Includes a statement that a A</i>  review of interim financial  information consists principally of  applying analytical procedures and  making inquiries of persons  responsible for financial and  accounting matters.</p> <p>iii. <i>Includes a statement that a A</i>  review of interim financial  information is substantially less in  scope than an audit conducted in  accordance with auditing standards  generally accepted in the United  States of America, the objective of</p>	

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		<p>which is an expression of an opinion regarding the financial <del>statements</del> <b>information</b> as a whole, and accordingly, the auditor does not express such an opinion.</p> <p>iv. <b><i>Includes a statement that</i></b> <del>the</del> auditor is required to be independent of the entity and to meet the auditor’s other ethical responsibilities, in accordance with the relevant ethical requirements relating to the review. (Ref: par. .A52–.A53)</p> <p>v. <b><i>States whether</i></b> <del>the</del> auditor believes that the results of the review procedures provide a reasonable basis for the auditor’s conclusion.</p>	

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Paragraph#	Respondent	Comment	Disposition
AU-C section 930 - paragraph .31d	08 - Deloitte & Touche LLP	<p>In paragraph .31d, the words “Review of” are missing, see proposed edit below.</p> <p><i>d.</i> A section, directly following the “Results of <b>Review of</b> Interim Financial Information” section, that includes the heading “Basis for Review Results,” and includes the following statements: (Ref: par. .A50)</p>	Agreed.

Summary of comments received on AU-C sections 725 730 and 930 – March 2020  
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Paragraph#	Respondent	Comment	Disposition
AU-C section 930 - paragraph .31d	14 – PricewaterhouseCoopers LLP	<p>We also believe the following edit (shown in underline) is needed to paragraph 31d to align with paragraph 31a and the illustrative report:</p> <p style="padding-left: 40px;">A section, directly following the “Results of <u>Review of Interim Financial Information</u>” section, that includes the heading “Basis for Review Results,” and includes the following statements...</p>	Done
AU-C section 930 - paragraph .31e	08 - Deloitte & Touche LLP	<p>In paragraph .31e (and corresponding illustrative reports) a section with the heading “Management’s Responsibility for the Interim Financial Information” is required. However, AU-C section 700 uses the term “Responsibilities of Management for the Financial Statements.” It is unclear why paragraph .31e of AU-C section 930 requires different terminology. Consider whether a change to paragraph .31e of AU-C section 930</p>	

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Paragraph#	Respondent	Comment	Disposition
		as well as the illustrative examples should be made to conform the section heading to AU-C section 700.	
		e. A section that includes the heading “ <b>Responsibilities of Management’s Responsibility</b> for the Interim Financial Information” and includes a statement that management is responsible for the preparation and fair presentation of the interim financial information in accordance with the applicable financial reporting framework, and for the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of interim financial information that is free from material misstatement, whether due to fraud or error.	Agreed – note, the wording in the ED is consistent with SSARs.
AU-C section 930 - paragraph .32	02 - Grant Thornton LLP	We question the utility of this paragraph since AU-C 570 does not contain reporting requirements related to reviews of interim financial information. Rather, it is our	Agreed.

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Paragraph#	Respondent	Comment	Disposition
		<p>understanding that the requirements for going concern reporting are provided in proposed paragraph .39 in AU-C 930. It is therefore unclear what paragraph .32 is directing auditors to do, and we recommend deleting this paragraph.</p>	
<p>AU-C section 930 - paragraph .32</p>	<p>14 – PricewaterhouseCoopers LLP</p>	<p>We believe consideration should be given to combining the requirements in paragraphs 32 and 39 to explain in a holistic manner how going concern matters are expected to be described in the review report. As currently drafted, it is unclear whether the intent of paragraph 32 is the same as the intent of paragraph 39b.</p>	<p>Paragraph .32 has been deleted so that the reporting requirements with respect to going concern are included within AU-C section 930.</p>

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Paragraph#	Respondent	Comment	Disposition
AU-C section 930, paragraph .39	14 – PricewaterhouseCoopers LLP	Paragraph 39 of AU-C section 930 could be viewed as requiring the phrase “an Entity’s” to be used in the auditor’s review report, even if the rest of the report uses another term, such as “the Company.” We believe this could result in a discrepancy between how the Company is referenced throughout the report. Therefore, we suggest paragraph 39 should be clarified to require a heading “Substantial Doubt About the Entity’s Ability to Continue as a Going Concern, or other appropriate heading”. This would also provide flexibility for the rest of the heading, for example, we have seen “Significant Doubt” used if the financial statements are IFRS as issued by the IASB. Using the phrase is consistent with some other AU-C sections, for example, in the Exposure Draft it is used in AU-C section 725.09, AU-C section 730.07, and AU-C section 940.64g.	The requirement is consistent with paragraph .24 of AU-C section 570.

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Paragraph#	Respondent	Comment	Disposition
		<p>Alternatively, the Board could consider adding language to AU-C section 930 similar to what is included in AU-C section 570.25 that the description in the “Going Concern” section about the entity’s ability to continue as a going concern for a reasonable period of time should use terms consistent with those included in the applicable financial reporting framework.</p>	<p>Done.</p>
		<p>We also note that paragraph 39 of AU-C section 930 does not address the circumstance in which the prior year auditor’s report referred to in the interim review report indicated substantial doubt about the entity’s ability to continue as a going concern, but substantial doubt has been alleviated in the interim period. The ASB should consider including guidance in AU-C section 930 to note that the auditor is not prohibited from explaining this circumstance in the interim review report.</p>	<p>Not included as such guidance would not be a conforming change.</p>

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Paragraph#	Respondent	Comment	Disposition
AU-C section 930 - paragraph .A68	02 - Grant Thornton LLP	We found the reference to AU-C 570.A47 to be confusing. The description in this paragraph does not appear to align with the content of the reference paragraph. Therefore, we recommend deleting this application paragraph. If the Board believes application guidance related to reporting is necessary, we suggest referencing AU-C 570.A51.	No change made.
AU-C section 930 - paragraph .A76 (Illustrative Reports)	05 - BDO USA LLP	<p>The following suggestion has been provided for illustration 1 in Exhibit B - Illustrations of Auditor’s Review Reports on Interim Financial Information; however, similar edits are applicable to other illustrations within Exhibit B.</p> <p>Illustration 1 - A Review Report on Interim Financial Information</p> <p>We have reviewed the accompanying [describe the interim financial information or statements reviewed] of ABC Company and its subsidiaries as of September 30, 20X1, and for the</p>	Agreed – with change, illustrative reports are consistent with the illustrations in PCAOB 4105.

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Paragraph#	Respondent	Comment	Disposition
		three-month and nine-month periods then ended, and the related notes to <del>the interim financial information</del> (collectively referred to as the "interim financial information").	
AU-C section 930 - paragraph .A76 (Illustrative Reports)	05 - BDO USA LLP	<p>Illustration 2 - A Review Report on Condensed Comparative Interim Financial Information</p> <p>Based on our reviews, we are not aware of any material modifications that should be made to the accompanying condensed <u>interim</u> financial information for it to be in accordance with [identify the applicable financial reporting framework; for example, accounting principles generally accepted in the United States of America].</p>	Agreed.
AU-C section 930 - paragraph .A76 (Illustrative Reports)	14 – PricewaterhouseCoopers LLP	Paragraph A76, all Illustrations - There is a typographical error in the last sentence of the Basis for Review Results section - “relative” should be changed to “relevant ethical requirements” to align with AU-C section 700.	Done.

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Paragraph#	Respondent	Comment	Disposition
		<p>Paragraph A76, Illustration #2 – The illustrative heading of “Results of Review of Condensed Interim Financial Information” does not align to the requirement in AU-C section 930.31c, “Results of Review of Interim Financial Information.” If the intention of AU-C section 930.31c is to allow flexibility in the title, we recommend that the phrase “or other appropriate heading” be added to AU-C section 930.31c.</p> <p>Paragraph A76, Illustration #2 – The illustration contains a subheading of “Report on Condensed Balance Sheet as of [date].” We note that PCAOB standards do not require this subheading, nor do we see a similar requirement in the Exposure Draft. Accordingly, we do not believe that this heading should appear in an illustration as it could be misinterpreted as being required.</p>	<p>Done</p> <p>The additional paragraph is included in the extant illustration. A change would not be a conforming change.</p>

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Paragraph#	Respondent	Comment	Disposition
AU-C section 930 - paragraph .A77 (Illustrative Reports)	14 – PricewaterhouseCoopers LLP	We considered the illustrative reports in Exhibit C when the auditor’s review report is modified. The requirements in AU-C section 930 do not address how the new required heading “Basis for Review Results” would be amended when the auditor’s review conclusion is modified. Rather, the illustrative examples retain the notion of a Basis for Modification Paragraph, but do not illustrate how the remainder of the report would be structured. We recommend Exhibit C include the entirety of the report, and we provide a suggested revised presentation in the Appendix to this letter. We do not think the Basis for Modification Paragraph heading is necessary as it is not required by AU-C section 930 and is confusing when viewed with the other required headings. While this is somewhat inconsistent with AU-C section 700 (which requires the Basis for Opinion heading to be modified), it aligns more closely with PCAOB AS 4105 and, in our view, results in a report that is easier to understand.	Done

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Paragraph#	Respondent	Comment	Disposition
AU-C section 930 - paragraph .A78 (Illustrations of Going Concern Paragraphs)	06 - Tennessee Department of Audit, Division of State Audit	On page 31 in the description of the illustrations, we believe the board needs to clarify that the notes to the financial statements appear to be referring to the interim financial statement notes, not the notes to the annual financial statements.	Agreed.

**Responses to Request for AU-C section 930 Comment #1**

**Request for Comment #1**

1. Are the proposed amendments to AU-C section 930 appropriate and complete?

**Detailed Responses**

Respondent	Comment	Disposition
01 - Michigan Office of the Auditor General	Yes, they are complete and appropriate. While we do regret the inconsistency with other AU-C reporting requirements by not including a section titled “Auditor’s Responsibility” in interim reports, the underlying information is included in the “Basis for Review Results” section and	See Discussion Memorandum.

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Respondent	Comment	Disposition
	<p>readers will receive the same information. We have no suggested changes.</p>	
<p>02 - Grant Thornton LLP</p>	<p>We generally support the proposed amendments to AU-C section 930. While we recognize that minimizing the unnecessary differences with PCAOB Auditing Standard (AS) 4105, Reviews of Interim Financial Information, could be beneficial, we encourage the Board to keep the proposed amendments closely aligned with SAS 134. We believe the Board has struck a reasonable balance in the amendments as proposed, and we particularly support including a section on management’s responsibilities for the interim financial information.</p>	
<p>03 - Ernst &amp; Young LLP</p>	<p>We support the ASB’s proposal to amend AU-C section 930 to conform with SAS No. 134 and also align with the requirements in Auditing Standard (AS) 4105, Reviews of Interim Financial Information, issued by the Public Company Accounting Standards Board (PCAOB). However, we recommend the revisions that we describe in Attachment B and our response to question 3 below.</p>	

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Respondent	Comment	Disposition
04 - Texas Society of CPAs	We have no objections to the proposed amendments for AU-C 930 and believe the amendments are appropriate and complete.	
05 - BDO USA LLP	Other than the editorial comments and suggestions listed in Appendix A, we find the amendments to AU-C section 930 to be appropriate and complete.	
06 - Tennessee Department of Audit, Division of State Audit	We agree the proposed amendments are appropriate and complete.	
07 - Commonwealth of Virginia, Auditor of Public Accounts	We agree with the proposed changes to existing standards, including the illustrative reports, and believe the changes are consistent with SAS Nos. 134 and 137.	
08 - Deloitte & Touche LLP	D&T believes, except for the amendment addressed by question 3 below and proposed editorial recommendations in Appendix B, that the changes pertaining to proposed AU-C section 930 are appropriate and complete.	
09 - Office of the Washington State Auditor	Our Office does not perform reviews of interim financial information and does not have comments regarding this section.	

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Respondent	Comment	Disposition
12 - Florida Institute of CPAs	The Committee believes that the proposed amendments to AU-C section 930 are appropriate and complete.	
13- KPMG LLP	The revisions to AU-C 930 for harmonization with the requirements in PCAOB AS 4105, including the placement of the auditor's review conclusion at the beginning of the review report on interim financial information is appropriate.	
14 – PricewaterhouseCoopers LLP	We generally believe the proposed amendments to AU-C section 930 are appropriate and complete, in particular aligning the form and content of paragraph 31 of AU-C section 930 to the form and content of AU-C section 700.	

**Responses to Request for AU-C section 930 Comment #2**

**Request for Comment #2**

2. Should the reporting requirements in paragraph .31 include revisions for harmonization with the requirements in PCAOB AS 4105, including the placement of the auditor’s review conclusion at the beginning of the review report on interim financial information?

**Detailed Responses**

Respondent	Comment	Disposition
01 - Michigan Office of the Auditor General	Yes, we agree with the proposed guidance to move the auditor’s conclusion on the review engagement to the first section of the auditor’s report as it is the most direct way of communicating the results of the engagement and to be consistent with other AICPA and PCAOB reporting.	
03 - Ernst & Young LLP	We support the harmonization of the reporting requirements in paragraph 31 of AU-C section 930, including the placement of the auditor’s review conclusion at the beginning of the review report on interim financial information, with the requirements in PCAOB 4105. Our recommendations and other editorial comments on the proposed amendments to paragraph 31 of AU-C section 930 are included in Attachment B.	

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Respondent	Comment	Disposition
04 - Texas Society of CPAs	We agree that it is appropriate to place the auditor’s review conclusion at the beginning of the review report.	
05 - BDO USA LLP	Yes, we are supportive of the revisions to paragraph .31, including revisions to harmonize with the requirements in PCAOB AS 4105. We find the placement of the auditor’s review conclusion at the beginning of the review report on interim financial information to be appropriate and consistent with the requirements in SAS No. 134.	
06 - Tennessee Department of Audit, Division of State Audit	We agree with placing the review conclusion at the beginning of the review report because of consistency with SASs 134 and 137. We believe consistency with the SASs should not be substantively compromised to harmonize with PCAOB. On the other hand, we support harmonization in general. However, we disagree with removing the separate section for “Auditor’s Responsibilities.” We believe the board should consider maintaining	See Discussion Memorandum.

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Respondent	Comment	Disposition
	<p>separate sections for “Management’s Responsibilities” and the “Auditor’s Responsibilities,” which should better inform a user’s understanding. In addition, we suggest the ASB consider including a statement that the auditor’s review objectives are to provide limited assurance and issue a conclusion report, to be consistent with SAS 134 reporting.</p>	<p>Another respondent commented that the term “limited assurance” is not defined in the auditing standards and suggested that it not be referenced in the proposed standard.</p>
<p>08 - Deloitte &amp; Touche LLP</p>	<p>We concur with the approach adopted by the ASB.</p>	
<p>12 - Florida Institute of CPAs</p>	<p>The Committee agrees with the ASB’s intent to a) harmonize the reporting requirements in paragraph .31 of AU-C section 930, Interim Financial Information with those of the PCAOB’s AS 4105, Reviews of Interim Financial Information and b) be in conformity with the reporting requirements of SAS No. 134 and SAS No. 137.</p>	<p>See Discussion Memorandum.</p>

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Respondent	Comment	Disposition
	However, the Committee believes additional time might be considered to allow smaller practitioners to get adequately prepared for implementation.	
12 - Florida Institute of CPAs	The Committee strongly agrees with the proposed reporting requirements that paragraph .31 should include revisions for harmonization with the requirements in PCAOB AS 4105, including the placement of the auditor’s review conclusion at the beginning of the review report on interim financial information.	
14 – PricewaterhouseCoopers LLP	We generally agree with the manner of presentation of the illustrative reports in Exhibit B, noting this is both consistent with SAS 134 and the PCAOB’s presentation.	

### Responses to Request for AU-C section 930 Comment #3

#### Request for Comment #3

3. Do you agree with aligning the dating requirement to be consistent with that of PCAOB AS 4105 and AR-C section 90?

#### Detailed Responses

Respondent	Comment	Disposition
01 - Michigan Office of the Auditor General	Yes, dating the report should be consistent with PCAOB AS 4105 and AR-C Section 90. Consistency among these standards will benefit auditors in applying the standard and would meet an expectation of consistency among users	
02 - Grant Thornton LLP	We do not agree with aligning the requirement for dating the auditor’s report so that it is consistent with those requirements in PCAOB AS 4105 and AR-C section 90, Review of Financial Statements. While we do not believe the differences between the proposed language and the existing language in both SAS 134 and AT-C section 210, Review Engagements would create significant number of differences in the	Revised dating requirement to remove any reference to “limited assurance.” Otherwise, the requirement is consistent with the requirement in paragraph .43 of AU-C section 700.

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Respondent	Comment	Disposition
	<p>actual dating of reports, we are concerned that having different language to convey the same meaning could be confusing, particularly among AU-C sections. Therefore, we encourage the Board to reconsider the language used in the dating requirement and suggest aligning it more closely with the language used in SAS 134.</p>	
03 - Ernst & Young LLP	<p>We recommend removing the phrase “limited assurance as.” The term “limited assurance” is not used elsewhere in AU-C section 930, including the examples of review reports. Making our suggested edit would better align the wording with the stated objective of the auditor, as described in AU-C 930.05, and avoid any unintended consequences, including confusion.</p>	Done
04 - Texas Society of CPAs	<p>We agree with aligning the dating requirement with AR-C 90 and PCAOB AS 4105.</p>	
05 - BDO USA LLP	<p>Yes.</p>	

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Respondent	Comment	Disposition
06 - Tennessee Department of Audit, Division of State Audit	We agree with aligning the dating requirement.	
08 - Deloitte & Touche LLP	<p>We do not agree with the approach taken by the ASB to align the dating requirement to be consistent with that of PCAOB Auditing Standard (AS) 4105, Reviews of Interim Financial Information, and AR-C section 90, Review of Financial Statements, thereby requiring that the review report “be dated no earlier than the date on which the auditor completed procedures sufficient to obtain limited assurance as a basis for reporting whether the auditor is aware of any material modifications that should be made to the interim financial information in order for it to be in accordance with the applicable financial reporting framework ....” This is contrary to existing requirements in both of the following:</p> <ul style="list-style-type: none"> <li>• Paragraph .19 of AU-C section 220, Quality Control for an Engagement</li> </ul>	

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Respondent	Comment	Disposition
	<p>Conducted in Accordance With Generally Accepted Auditing Standards, which states that “[o]n or before the date of the auditor’s report, the engagement partner, through a review of the audit documentation and discussion with the engagement team, be satisfied that sufficient appropriate evidence has been obtained to support the conclusions reached and for the auditor’s report to be issued.”</p>	
	<ul style="list-style-type: none"> <li>• Paragraph .42 of AU-C section 700 (SAS No. 134), which states that “[t]he auditor’s report should be dated no earlier than the date on which the auditor has obtained sufficient appropriate audit evidence on which to base the auditor’s opinion on the financial statements...”</li> </ul> <p>If the requirements as drafted are adopted as final, the auditor would have a different basis for dating the auditor’s interim review report and the auditor’s report on the financial statements. D&amp;T believes that this lack of</p>	

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Respondent	Comment	Disposition
	<p>consistency of the reporting elements across the auditor reports will lead to confusion and inadvertent misapplication of the requirements.</p> <p>Further, the term “limited assurance” is not defined in the AU-C Glossary, Glossary of Terms, nor is it used elsewhere in AU-C section 930; consequently, the auditor will not have the necessary context needed to make the determination as to when the report should be dated.</p> <p>As such, we recommend that the requirement be aligned with that in paragraph .42 of AU-C section 700, the foundational auditing standard for all auditor reports issued by AICPA professionals.</p>	<p>Revised dating requirement to remove any reference to “limited assurance.”</p> <p>Otherwise, the requirement is consistent with the requirement in paragraph .43 of AU-C section 700.</p>

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Respondent	Comment	Disposition
12 - Florida Institute of CPAs	The Committee also agrees with aligning the dating requirement to be consistent with that of PCAOB AS 4105, Reviews of Interim Financial Information and AR-C section 90, Review of Financial Statements.	
13 – KPMG LLP	We agree that the dating requirement should be consistent with that of PCAOB AS 4105 and AR-C section 90.	
14 – PricewaterhouseCoopers LLP	We do not object to aligning the dating requirement to be consistent with AR-C section 90, as this is substantially the same as the principle in AT-C section 210 to obtain sufficient evidence to support the practitioner’s conclusion (i.e., to enable the auditor to make the statements required by paragraph 31c of AU-C section 930).	