

RESPONSE TEMPLATE FOR THE ED OF PROPOSED NARROW SCOPE AMENDMENTS TO ISQMs, ISAs AND ISRE 2400 (REVISED)

Guide for Respondents

Comments are requested by **April 8, 2024**.

This template is for providing comments on the Exposure Draft (ED) of proposed Narrow Scope Amendments to the International Standards on Quality Management (ISQMs), the International Standards on Auditing (ISAs) and the International Standard on Review Engagement (ISRE) 2400 (Revised), *Engagements to Review Historical Financial Statements* as a Result of the Revisions to the Definitions of Listed Entity and Public Interest Entity (PIE) in the IESBA Code, in response to the questions set out in the Explanatory Memorandum (EM) to the ED. It also allows for respondent details, demographics and other comments to be provided. Use of the template will facilitate the IAASB's automated collation of the responses.

You may respond to all questions or only selected questions.

To assist our consideration of your comments, please:

- For each question, start by indicating your overall response using the drop-down menu under each question. Then below that include any detailed comments, as indicated.
- When providing comments:
 - Respond directly to the questions.
 - Provide the rationale for your answers. If you disagree with the proposals in the ED, please provide specific reasons for your disagreement and specific suggestions for changes that may be needed to the requirements, application material or appendices. If you agree with the proposals, it will be helpful for the IAASB to be made aware of this view.
 - Identify the specific aspects of the ED that your response relates to, for example, by reference to sections, headings or specific paragraphs in the ED.
 - Avoid inserting tables or text boxes in the template when providing your responses to the questions because this will complicate the automated collation of the responses.
- Submit your comments, using the response template only, without a covering letter or any summary of your key issues, instead identify any key issues, as far as possible, in your responses to the questions.

The response template provides the opportunity to provide details about your organization and, should you choose to do so, any other matters not raised in specific questions that you wish to place on the public record. All responses will be considered a matter of public record and will ultimately be posted on the IAASB website.

Use the "**Submit Comment**" button on the ED [web page](#) to upload the completed template.

Responses to IAASB’s Request for Comments in the EM for the ED, Proposed Narrow Scope Amendments to ISQMs, ISAs and ISRE 2400 (Revised) as a Result of the Revisions to the Definitions of Listed Entity and PIE in the IESBA Code

PART A: Respondent Details and Demographic information

Your organization’s name (or your name if you are making a submission in your personal capacity)	KICPA (The Korean Institute of Certified Public Accountants)
Name(s) of person(s) responsible for this submission (or leave blank if the same as above)	Hong Jong-Hyeok
Name(s) of contact(s) for this submission (or leave blank if the same as above)	
E-mail address(es) of contact(s)	hyeok07@kicpa.kr
Geographical profile that best represents your situation (i.e., from which geographical perspective are you providing feedback on the ED). Select the most appropriate option.	Asia Pacific
	If “Other”, please clarify
The stakeholder group to which you belong (i.e., from which perspective are you providing feedback on the ED). Select the most appropriate option.	Member body and other professional organization
	If “Other”, please specify
Should you choose to do so, you may include information about your organization (or yourself, as applicable).	

Should you choose to do so, you may provide overall views or additional background to your submission. **Please note that this is optional.** The IAASB’s preference is that you incorporate all your views in your comments to the questions (also, the last question in Part B allows for raising any other matters in relation to the ED).

Information, if any, not already included in responding to the questions in Parts B and C:

PART B: Responses to Specific Questions in the EM for the ED

For each question, please start with your overall response by selecting one of the items in the drop-down list under the question. Provide your detailed comments, if any, below as indicated.

Objective for Establishing Differential Requirements for PIEs

1. Do you agree with establishing the overarching objective and purpose for establishing differential requirements for PIEs proposed in paragraphs A29A–A29B of ISQM 1 and paragraphs A81A–A81B of ISA 200 in the ED? If not, what do you propose and why?

(See EM Section 1-B, paragraphs 13-18)

Overall response: [Agree \(with no further comments\)](#)

Detailed comments (if any):

Definitions of PIE and “Publicly Traded Entity”

2. Do you agree with adopting the definitions of PIE and “publicly traded entity” into ISQM 1 and ISA 200 (see proposed paragraphs 16(p)A–16(p)B of ISQM 1 and paragraphs 13(l)A–13(l)B of ISA 200 in the ED)? If not, what do you propose and why?

(See EM Section 1-C, paragraphs 19-26)

Overall response: [Agree \(with no further comments\)](#)

Detailed comments (if any):

Differential Requirements in the ISQMs and ISAs

- 3A. Do you agree with the IAASB’s proposals for extending the extant differential requirements for engagement quality reviews to apply to PIEs (ISQM 1, paragraph 34(f) in the ED)?

(See EM Section 1-D, paragraphs 27-40 and Appendix 1)

Overall response: [Agree \(with no further comments\)](#)

Detailed comments (if any):

If you do not agree, what alternatives do you suggest (please elaborate why you believe such alternatives would be more appropriate, practicable and capable of being consistently applied globally)?

Detailed comments (if any):

3B. Do you agree with the IAASB's proposals for extending the extant differential requirements for communication with TCWG about the firm's system of quality management to apply to PIEs (ISQM 1, paragraph 34(e) in the ED)?

(See EM Section 1-D, paragraphs 27-38 and Appendix 1)

Overall response: Agree (with no further comments)

Detailed comments (if any):

If you do not agree, what alternatives do you suggest (please elaborate why you believe such alternatives would be more appropriate, practicable and capable of being consistently applied globally)?

Detailed comments (if any):

3C. Do you agree with the IAASB's proposals for extending the extant differential requirements for communicating about auditor independence to apply to PIEs (ISA 260 (Revised), paragraphs 17 and 17A, and ISA 700 (Revised), paragraph 40(b) in the ED)?

(See EM Section 1-D, paragraphs 27-38 and 41-45 and Appendix 1)

Overall response: Agree (with no further comments)

Detailed comments (if any):

If you do not agree, what alternatives do you suggest (please elaborate why you believe such alternatives would be more appropriate, practicable and capable of being consistently applied globally)?

Detailed comments (if any):

3D. Do you agree with the IAASB's proposals for extending the extant differential requirements for communicating KAM to apply to PIEs (ISA 700 (Revised), paragraphs 30-31, 40(c) and ISA 701, paragraph 5 in the ED)?

(See EM Section 1-D, paragraphs 27-38 and 46 and Appendix 1)

Overall response: [Disagree, with comments below](#)

Detailed comments (if any):

The KICPA doesn't agree with the ED proposals for extending the requirement for communication of KAM to PIEs. Extending this requirement to PIEs is expected to cause problems as described below.

- ISA 701 A34-A36 state that it is appropriate for the auditor to seek to avoid inappropriately disclosing the original information about the entity, i.e. the information not disclosed by the entity, when describing KAM. For the listed entity, the auditor can describe KAM without disclosing the original information, only by making reasonable efforts, because the listed entity discloses a wide range of information. However, as for the public interest entity which is an unlisted entity, it may be challenging for the auditor to describe KAM without disclosing the original information, only by making reasonable efforts, due to a very limited disclosed information. In addition, there is a high likelihood that the auditor may disclose the original information inadvertently.
- Different countries use different approaches to respond to the public interest in the financial condition of a public interest entity which is not a listed entity. These approaches can be more effective than communication of KAM (e.g.: submission, disclosure and supervision of Solvency and Financial Condition Report). If more effective approaches are available to use, the information user may not have a strong demand for the transparency of auditor's report. Requiring the communication of KAM in all circumstances including the above situation is not likely to produce benefits which significantly outweigh the costs.
- The public interest entity which is not a listed entity may have varying governance structures by jurisdiction. In some jurisdiction, some PIEs may not have TCWG which is available for the auditor to fully communicate with when selecting KAM. Disclosing the information that has not been fully communicated with TCWG as KAM is likely to have more negative impacts (i.e., disclosing inappropriate information) than benefits (i.e., enhancing the transparency of auditor's report).
- As for the PIE like a financial institution, the areas involving a high audit risk or requiring significant auditor attention are largely similar and easily predictable. Therefore, the information value of KAM is not likely to be high, as KAM only includes highly predictable boiler plate information.

In this regard, it is deemed to be appropriate to maintain the extant requirement, i.e. requiring the auditor to voluntarily describe KAM when the auditor believes that there is a strong demand for transparency among information users.

If you do not agree, what alternatives do you suggest (please elaborate why you believe such alternatives would be more appropriate, practicable and capable of being consistently applied globally)?

Detailed comments (if any):

3E. Do you agree with the IAASB's proposals for extending the extant differential requirements for the name of the engagement partner to apply to PIEs (ISA 700 (Revised), paragraphs 46 and 50(I))?
(See EM Section 1-D, paragraphs 27-38 and Appendix 1)

Overall response: Disagree, with comments below

Detailed comments (if any):

The KICPA doesn't agree with the ED proposals for extending the requirement for including the name of the engagement partner in the auditor's report on general purpose financial statements, to PIEs.

IAASB's PIR(Auditor Reporting Post-Implementation Review) survey also indicated that stakeholders found the name of the engagement partner relatively less useful, compared to other information included in the auditor's report. In addition, a study conducted by the KICPA on relevant topics (case study on the impact of the auditor's report revision and key audit matters) showed that local stakeholders thought that inclusion of the name of the engagement partner had a moderate level of impact on the improvement of audit quality. In conclusion, it is hard to believe that there is a solid stakeholder support for the information usefulness of the name of the engagement partner.

Furthermore, inclusion of the name of the engagement partner has direct implications on the legal liability of an individual with regard to any future regulations or lawsuits. In this regard, a careful approach is required to extend this requirement to all PIEs, considering that laws/regulations and social systems vary by jurisdiction.

If you do not agree, what alternatives do you suggest (please elaborate why you believe such alternatives would be more appropriate, practicable and capable of being consistently applied globally)?

Detailed comments (if any):

Therefore, we propose that the name of the engagement partner should be included in the auditor's report on financial statements of Publicly Traded Entities, instead of PIEs.

4. Do you agree with the IAASB's proposal to amend the applicability of the differential requirements for listed entities in ISA 720 (Revised) to apply to "publicly traded entity"? If not, what do you propose and why?

(See EM Section 1-D, paragraphs 47-51)

Overall response: [Agree \(with no further comments\)](#)

Detailed comments (if any):

Proposed Revisions to ISRE 2400 (Revised)

5. Do you agree with the new requirement and application material in ISRE 2400 (Revised) to provide transparency in the practitioner's review report about the relevant ethical requirements for independence applied for certain entities, such as the independence requirements for PIEs in the IESBA Code? If not, what do you propose and why?

(See EM Section 1-E, paragraphs 52-57)

Overall response: [Agree \(with no further comments\)](#)

Detailed comments (if any):

Other Matters

6. Are there any other matters you would like to raise in relation to the ED? If so, please clearly indicate the requirement(s) or application material, or the theme or topic, to which your comment(s) relate.

Overall response: [No response](#)

Detailed comments (if any):

Part C: Request for General Comments

The IAASB is also seeking comments on the matters set out below:

7. Translations—Recognizing that many respondents may intend to translate the final narrow scope amendments for adoption in their own environments, the IAASB welcomes comment on potential translation issues respondents note in reviewing the ED.

Overall response: [No response](#)

Detailed comments (if any):

8. Effective Date—Given it is preferred to coordinate effective dates with the fraud and going concern projects, the IAASB believes that an appropriate effective date for the narrow scope amendments would be for financial reporting periods beginning approximately 18-24 months after approval of the final narrow scope amendments for Track 2. The IAASB welcomes comments on whether this would provide a sufficient period to support effective implementation of the narrow scope amendments for Track 2 of the listed entity and PIE project.

Overall response: [No response](#)

Detailed comments (if any):