

**ASOCIACION INTERAMERICANA DE CONTABILIDAD
INTERAMERICAN ACCOUNTING ASSOCIATION
ASSOCIAÇÃO INTERAMERICANA DE CONTABILIDADE**

Ciudad de Panamá July 1st, 2020

Carta N.º 22/2020 AIC

Members of the Board
International Auditing and Assurance Standards Board (IAASB)
529 5th Avenue, 6th Floor
New York, New York 10017

**REF: Proposed Non-Authoritative Guidance. Extended External Reporting (EER)
Assurance**

Dear Members of the Board,

The Inter-American Accounting Association (IAA) (AIC – in Spanish), welcomes the opportunity to comment on the Exposure Draft Proposed Non-Authoritative Guidance. Extended External Reporting (EER) Assurance.

This reply summarizes the views of different member countries of the IAA, according to the following due process:

Due process:

The Draft was submitted to the different IAA member, the Inter-American Technical Commissions (ITC) and the Sponsor Organizations (SO); hence all members had the opportunity to participate in the discussion of the Draft.

All comments received from the ITC and SO, were compared and discussed, before preparing a reply which has been approved upon by all members

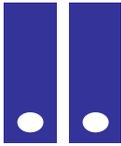
General comments:

We decisively support the IAASB initiative on this important issue, considering the educational issue as fundamental in the formation and exercise of the accounting and auditing professional.

If you have any questions about our comments, please do not hesitate to contact us.

Sincerely,

Maria Clara Cavalcante B.
PRESIDENT



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Comment Letter of the Interamerican Accounting Association- IAA on the document for public discussion referred to; “Proposed Non-Authoritative Guidance. Extended External Reporting (EER) Assurance”

We have answered the questions of the document in accordance with the provided instructions. Please see our answers and related comments below.

Request for Specific Comments

Question 1 Does the draft Guidance adequately address the challenges for practitioners that have been identified as within the scope of the draft Guidance? If not, where and how should it be improved to better serve the public interest in EER assurance engagements?

Answer 1 **Yes, we consider that it adequately addresses the commitments. The draft guidance is sufficiently explicit and rich as technical material, which we are sure will be of great help to professionals who offer their services independently, as well as having a great impact on the management of the preparers of the information on which the Professionals will issue their EER.**

Question 2 Is the draft Guidance structured in a way that is easy for practitioners to understand and use in performing EER assurance engagements? If not, where and how should it be improved to better serve the public interest in EER assurance engagements?

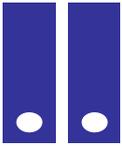
Answer 2 **Yes, the guide draft is structured in a way that is easy to understand and, we are certain, that once the professionals become familiar with its use, it will be user-friendly. In our opinion the document is excellent; especially the examples and diagrams will help a lot in its application and for a proper understanding of the purpose of the guide.**

Request for General Comments

Question a) Stakeholder Perspectives—Respondents representing stakeholders such as preparers (including smaller entities) of EER reports, users of EER reports, and public sector entities are asked to comment on the questions above from their perspective.

Answer a) **As independent professionals in the audit services practice, users of IFAC standards, from our perspective, we understand that the project adequately addresses this new assurance service and constitutes a good guideline guide for both the preparation as well as for the EER examination, in addition, opens a new job opportunity, on the one hand, and on the other, it will increase in a superlative way the role of the public accountant in public activity, which in turn will increase the consideration towards professionals, in addition to increasing the quality of the service for the users who hire them.**

Question b) Developing Nations—Recognizing that many developing nations have adopted or are in the process of adopting the International Standards, the IAASB invites respondents from these nations to comment, in particular, on any foreseeable difficulties in using the draft guidance in a developing nation environment.



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Answer b) As we discussed in c) below, developing countries have a vast amount of difficulties in appropriately adopting the international standards issued by IFAC through its different Councils due to the problem of translation. The difficulties that these developing nations already have is aggravated by the difficult access to the current IFAC standards, although it is true on the website of the issuing entity of the standards is available, it should be borne in mind that several of These countries do not have sufficient and easy access to the electronic page, added to the complexity of finding the standard that the user requires on the page. If it wants a more universal application, IFAC should make every effort to facilitate access to its standards, especially for developing countries.

Question c) Translation—Recognizing that many respondents may intend to translate the final guidance for adoption in their own environments, the IAASB welcomes comments on potential translation issues.

Answer c) In countries that speak a language other than English, possibly the biggest problem that users of IFAC standards have is the translation into a language other than the one of origin (English), particularly into Spanish, there are discrepancies between translations made by different jurisdictions, since in this language there are several translators, which generates different interpretations from one jurisdiction to another, conspiring against the high quality of all the standards issued by the different IFAC Councils. We believe that a great solution to this problem could be provided through a single translation carried out by IFAC through an internal body, for which it could constitute an official translation committee for the different languages

Conclusion, based on the answers to the questions of numerals 1 and 2 and the general comments indicated in letters (a), (b) and (c), we conclude that the proposed documents will constitute the guide of unauthorized guidance (is say not mandatory), they are clear, understandable and practical for the future application of the guide when it is in force.