10 July 2020

Mr Tom Seidenstein,
Chair,
International Auditing and Assurance Standards Board,
529 Fifth Avenue, 6th Floor,
New York,
NY 10017,
USA.

Dear Mr Seidenstein

Proposed Non-Authoritative Guidance Extended External Reporting (EER) Assurance

Crowe Global is delighted to present a comment letter on the Proposed Non-Authoritative Guidance Extended External Reporting (EER) Assurance. Crowe Global is a leading global network of audit and advisory firms, with members in some 130 countries.

We welcome the attention that the IAASB is giving to developing guidance to assist the performance of EER engagements. As the IAASB observes these engagements are becoming increasingly common. The development of this guidance is important for the public interest.

Overall, we agree with the structure and content of the draft Guidance. There is good use of diagrams and examples. Our responses to the Request for Comments are below.

Does the draft Guidance adequately address the challenges for practitioners that have been identified as within the scope of the draft Guidance?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?

The draft Guidance does adequately address the challenges for practitioners that have been identified as within the scope of the draft Guidance. We have no specific suggestions for improvement at this stage. We would observe that a post implementation review at an appropriate time following the implementation of the Guidance will present an important opportunity to assess the experience of applying the Guidance in practice.

Is the draft Guidance structured in a way that is easy for practitioners to understand and use in performing EER assurance engagements?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?
The draft Guidance is structured in a way that is easy for practitioners to understand and use. The structure is logical, and the order of chapters makes sense. We agree with the suggestion in paragraph 18 that the chapters of the Guidance be presented in three parts. We welcome the use of hyperlinks for referencing.

We trust that our comments assist IAASB in completing the EER project. We shall be pleased to discuss our comments further with you.

Kind regards

Yours sincerely

David Chitty
International Accounting and Audit Director