

May 23, 2022

Mr. Ken Siong  
Senior Technical Director  
International Ethics Standards Board for Accountants  
529 Fifth Avenue  
New York, NY 10017

Submitted via: [Submit a Comment](#) link at ethicsboard.org

**Re: IESBA Exposure Draft – *Proposed Revisions to the Code Relating to the Definition of Engagement Team and Group Audits***

Dear Mr. Siong:

The New York State Society of Certified Public Accountants (NYSSCPA), representing more than 21,000 CPAs in public practice, industry, government and education, welcomes the opportunity to comment on the above-captioned exposure draft.

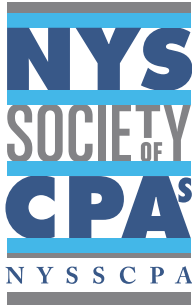
The NYSSCPA's Professional Ethics Committee deliberated the exposure draft and prepared the attached comments. If you would like additional discussion with us, please contact Victoria L. Pitkin, Chair of the Professional Ethics Committee, at (312) 670-0538, or Ernest J. Markezin, NYSSCPA staff, at (212) 719-8303.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rumbi Bwerinofa-Petrozzello'. The signature is written over a faint, light blue watermark of the NYSSCPA logo.

Rumbi Bwerinofa-Petrozzello  
President

Attachment



**NEW YORK STATE SOCIETY OF  
CERTIFIED PUBLIC ACCOUNTANTS**

**COMMENTS ON**

**IESBA EXPOSURE DRAFT – *PROPOSED REVISIONS TO THE CODE RELATING TO  
THE DEFINITION OF ENGAGEMENT TEAM AND GROUP AUDITS***

**May 23, 2022**

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Elliot L. Hendler**

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Ernest J. Markezin

**New York State Society of Certified Public Accountants**

**Comments on**

**IESBA Exposure Draft – *Proposed Revisions to the Code Relating to the Definition of Engagement Team and Group Audits***

The New York State Society of Certified Public Accountants (NYSSCPA) appreciates the opportunity to provide comments on the International Ethics Standards Board for Accountants' (IESBA) Exposure Draft, *Proposed Revisions to the Code Relating to the Definition of Engagement Team and Group Audits* of February 2022.

The proposed amendments appear reasonable and represent a desirable effort by the IESBA to conform international ethics standards and audit standards, thereby avoiding confusion and uncertainty.

The proposed changes seek to harmonize standards, including independence standards, which sometimes vary among supervisory bodies. In particular, the maintenance of independence, both real and apparent, is critical in avoiding unacceptable influence on attest engagements.

The International Auditing and Assurance Standards Board (IAASB) recognized that, under current practice, engagement teams may be organized in many ways, including being in one physical location or in several different geographic areas. In seeking to assign the best qualified personnel for an engagement, firms often draw from their staff in many separate locations. The IAASB also recognized that individuals involved in the audit engagement may not necessarily be engaged or employed directly by the firm. Thus, the IAASB proposed that assigned personnel would be considered part of the Engagement Team (ET) regardless of their location or employment status if the individuals perform audit procedures on the engagement. As members of the ET, such personnel can be appropriately directed, supervised, and reviewed.

These recognitions of IAASB have been appropriately incorporated in the proposed changes. We applaud the IESBA's efforts to harmonize audit and ethical standards and, very importantly, to recognize changed and evolving practices in staffing, supervising, and reviewing attest engagements.