

Envisioning the Future—Survey on the IAASB's Future Strategy

Response ID:561 Data

7. SECTION III: ABOUT THE RESPONDENT

1. From which perspective are you providing this feedback:

A personal view.

2. Please Indicate:

Name : Romeo Mitri

Organization, if applicable : IEKA

Please complete

Select from the following options that describe your organization:

Is this a/an:

Is this response on behalf of the global network?

Is this response on behalf of a regional or national firm?

Other Firm?

IFAC Member Body or Other Professional Organization

National auditing standards same as, or based on, the IAASB's current International Standards on Auditing

Please specify which standards are used:

Other national standards same as, or based on, IAASB's other standards (i.e., assurance, related services and reviews)

Please specify which standards are used:

Are you a listed or non-listed entity?

Small or Medium-Sized The concept of 'smaller or less complex entities' varies country by country, but ordinarily exhibits one or more of the following characteristics: Concentration of ownership and management in a small number of individuals. One or more of the following: Straightforward or uncomplicated transactions. Simple record keeping; Few lines of business and few products within business lines; Few formal internal controls; Few levels of management with responsibility for a broad range of controls; or Few personnel, many having a wide range of duties.

.Entity?

Please Indicate:

Do you apply International Standards of Supreme Audit Institutions (ISSAIs) for financial audits

Those Charged with Governance

Private Sector

Please specify in the box below.

3. Are you any of the following?

Member, Technical Advisor or Observer of Other Public Interest Activity Committee, IFAC Board or Other IFAC Committee

4. Please select the geographical region where you are based:

Europe

8. SECTION IV - QUESTIONS FOR RESPONDENTS ABOUT THE IAASB'S STRATEGY FOR 2020-2023

5. 1. In your view, will the strategic environment affecting the needs of the IAASB's stakeholders look like in 2020 onward and what will be the impact on the IAASB's International Standards (for example, will the audit market change significantly; will other services dominate stakeholders needs – including what the needs may be for different types of evolving services; how evolving technologies, such as cryptocurrency, artificial intelligence or blockchain , will impact the environment in which the IAASB's stakeholders operate, etc.).

In my view, IAASB's International Standards should consider the audit techniques, tests of controls, and substantive procedures. This scope of standards will not change, the ICT environment is changing and IAASB needs to develop the CAAT, computerizing step by step all processes and conclusive evidence. IAASB should not try to develop standards for new types of transactions or for lack of ethics in audits.

1. In your view, will the strategic environment affecting the needs of the IAASB's stakeholders look like in 2020 onward and what will be the impact on the IAASB's International Standards (for example, will the audit market change significantly; will other services dominate stakeholders needs – including what the needs may be for different types of evolving services; how evolving technologies, such as cryptocurrency, artificial intelligence or blockchain , will impact the environment in which the IAASB's stakeholders operate, etc.). - Text Analysis

6. 2. Section II. Describes the additional challenges and opportunities that the IAASB has identified relating to its people, processes and technology, including possible changes that may arise from the MG consultation. In your view, as the IAASB develops its Strategy for 2020–2023, what are the:

- (a) Key challenges and other factors that may impact the IAASB's activities and focus; and(b)
- (b) Main opportunities for changing the way it undertakes its activities.

Your response may include views about the matters identified by the IAASB as set out in Section III, but any views about matters that have not been mentioned are particularly welcome.

Key challenge 1, is the lack of due process in capturing, discussing, developing, drafting, exposing to the public, and approving the standards.

Key challenge 2, is the risk of over-inflating the existing standards, like doubling or tripling the volume of pages of each or most of the standards. This exercise should be stopped immediately.

Key challenge 3, is the risk of developing new standards that are not needed, there are not services required by entities, but are just a tool to expand the IAASB office budget (like Emerging Forms of External Reporting).

Key challenge 4, is the separate work and activities between IAASB and IESBA. By not embedding the ethics to audit report and audit engagement letter, and keep auditors responsible for ethical standards compliance, the job of IESBA remains unrelated, and lack purpose.

Key challenge 5, is the need of written guidance on writing and drafting audit, assurance, and other services standards.

7. 3. Are there specific initiatives within the stakeholder group to which you belong, or of which you are aware, that you believe the IAASB should actively monitor in light of their potential to inform the IAASB's future agenda? If so, what are they, and why do you think they are relevant to the IAASB?

The immediate task to bring together the standards for big firms and SMP.
To avoid two different set of standards within the IAAS.

9. THE FOCUS OF THE IAASB'S ACTIVITIES IN 2020–2023

8. 4. Section II illustrates that the IAASB has, and will continue to, focus a significant part of its efforts in 2015–2019 on revising and developing standards addressing the audit of historical financial information and quality control. With respect to new standard-setting projects for the period 2020–2023, in light of where you believe IAASB actions are needed and to continue to serve the public interest, in your view what proportion of effort should the IAASB allocate to each of the following? (Allocation should total 100%)

Quality control : 50%

Audits and reviews of historical financial information : 20%

Other assurance- [EER Emerging Forms of External Reporting \(EER\)](#) refers to emerging forms of external reporting by entities that increasingly provide non-financial information that goes beyond the traditional (financial statement) focus on the entity's financial position, financial; performance and impact on its financial resources. engagements : 0%

Other assurance (and [related services](#) [Related services pronouncements include: ISRS 4400, Engagements to Perform Agreed-Upon Procedures Regarding Financial Information \(currently being revised\); ISRS 4410 \(Revised\), Compilation Engagements.](#)) - other than EER engagements : 10%

Professional skepticism : 10%

Matters relating to audits of smaller and less complex entities : 10%

Total : 100%

Comments: Please don't loose further time and efforts with EER, nobody is willing to hear for that.

9. *Please provide relative %; for each option by category to total 100%*

| | (i) Developing new or revised standards | (ii) Undertaking implementation activities | (iii) Apply efforts to both |
|--|---|--|---|
| Quality control | 0% | 100% | 0% |
| Audits and reviews of historical financial information | 10% | 90% | 0% |
| Other assurance – EER engagements | 0% | 0% | 0% |
| Other assurance (other than EER engagements) and related services Related services pronouncements include: ISRS 4400, Engagements to Perform Agreed-Upon Procedures Regarding Financial Information (currently being revised); ISRS 4410 (Revised), Compilation Engagements. | 25% | 75% | 0% |

Comments: N/A

10. 6. In relation to the development of new, or the revision of extant, standards as noted in Question 5, and in keeping an open mind as to the impact of the evolving environment and the challenges and opportunities for the IAASB in 2020–2023, should the IAASB, in your view:

- (a) Focus first on a strategic review of extant standards (for example, consider how the standards could be better structured or presented in light of evolving technologies) before prioritizing projects on new topics. Please provide an explanation for your view.**
- (b) Prioritize projects on new topics (as determined by the consultation on the IAASB's future strategy and priorities). Please provide an explanation for your view.**
- (c) During implementation of the current standards under revision (i.e., those standards that currently have a committed project plan in place), consider a moratorium on developing new or other revised standards? If so, how long should such a moratorium last? Please provide an explanation for your view.**
- (d) Undertake other actions related to the development of new, or revision of extant, standards, and/or implementation support. Please describe what these actions should be and provide an explanation for your view.**

(a) Yes, focus first on a strategic review, for better implementation of evolving technologies, and bringing together as one set of IAAS, the big practices and SMP.

(b) No, new topics should be considered under actual audit tests of controls, and substantive procedures.

c. IAASB should consider postponing all the current standards under revisions, to apply for a new due process, and following the moratorium, until the IAASB mission and strategic objectives are redefined, and guidelines approved and published.

(d) Undertake drafting and approval of due process in standards setting and respective activities, agreed upon by all the stakeholders, by unanimity. Prepare and approve the guidelines for writing, drafting, and formulating IAAS in close co-operation with IASB and FASB. Stop activities for drafting futurist standards, let them to research institutions and academic organizations.

11. 7. If there was a specific topic(s) that, in your view, should be the IAASB's priority(ies) when developing new, or revising existing, standards or related guidance for the period 2020—2023, what would it be, and why?

Where applicable, kindly indicate whether in your view the topic(s) (you have indicated) has particular relevance mainly for engagements for listed entities, small- and medium-sized entities (SMEs), or for entities of all sizes. Views in relation to matters of relevance to developing nations and the public sector are also encouraged.

The IAASB Priority 1, is to consider itself as unifying, simplifying, worldwide applicable, high quality audit and assurance standards, in public interest.

Priority 2, is that standards should be one set, not two or three, of international standards, generally accepted, and principle based.

Priority 3, the standards should be applicable to all audits of financial statements of entities, despite their size, legal form, management structure, nationality, or if they are listed or not. As it is actually provided, the auditors may address other requirements by legal and regulatory laws, separately.

Priority 4, is to prepare the guidelines for writing, drafting, and presenting the draft standards.

12. 8. Are there any other topics of interest or matters of relevance that you feel the IAASB should consider when conducting its strategic review, including those related to its the way that the IAASB undertakes its activities (e.g., changes to address matters highlighted in the MG review)?

The most relevant topic is to stop IAASB producing inflated standards, which will triple the volume of pages of standards and reduce their relevance, accordingly. It should be stated in the IAASB mission that more pages are not higher quality standards, but the inverse is true.