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Individual Commentary

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The IAASB's Proposed Strategy for 2015–2019
The IAASB's Proposed Work Program for 2015–2016

I'm Denise Juvenal this is pleased to have the opportunity to comment on this consultation of The IAASB's Proposed Strategy for 2015–2019 - The IAASB's Proposed Work Program for 2015–2016 this is my individual commentary for International Auditing and Assurance Standards Board – IAASB/IFAC.

Questions for Respondents

Proposed Strategy for 2015–2019

The IAASB is particularly interested in respondents' views on:

- (a) Whether the strategic objectives identified are considered appropriate for the period 2015–2019. If not, please explain.**

I agree with the strategic objectives identified and I understand that they are appropriate for the period 2015-2019. I think that the principal developments and the principal discussions in the current global environment the IAASB's strategy for the period 2015-2019.

| The strategic objectives for 2015–2019 identified by the IAASB are to: | |
|---|---|
| Description | Comments |
| (i) Develop and Maintain High-Quality ISAs that Are Accepted as the Basis for High-Quality Financial | I think that this point is very important, principally because audit regulators and audit inspections have great modifications in this moment. I understand |

| The strategic objectives for 2015–2019 identified by the IAASB are to: | |
|--|---|
| Description | Comments |
| Statement Audits | that High Quality Financial Statements Audits that impact in the development of accountant profession that needs to have integration and training of professionals and principally a new focus for the universities in relation the account profession for the future accountants. |
| (ii) Ensure the IAASB's Suite of Standards Continues to Be Relevant in a Changing World by Responding to Stakeholder Needs | In relation this point, I understand that IFAC needs to observe with more detail about Risk Management, and Risk Assessment in relation the new discussions with focus in the international standards, integrated principally with Managing Sustainability Risks the Focus of COSO's ¹ . |
| (iii) Collaborate and Cooperate with Contributors to the Financial Reporting Supply Chain to Foster Audit Quality and Stay Informed | The cooperation and collaboration with stakeholders and the key international regulators are important for development and discussion with transparency of the matter, principally with detection of problems and difficulties in the application and implementation of these standards. |

(b) Whether the factors included in Appendix 2 on page 19 represent a reasonable basis for the IAASB to use in developing its Work Programs beyond the Work Program for 2015–2016.

| Description | Comments |
|---|--|
| Appendix 1 - Important Considerations in Setting the IAASB's Work Program for 2015–2016 | |
| Balance of Resources between the IAASB, Its Chairman and Its Staff | I agree with comments of this proposal. I think that the IFAC has a great team. The connection is very important for development of transparency of the projects and work with responsibility. |
| Key Assumptions | I agree with comments for key assumptions. I think that in relation this point is very important public interest independent if public or private sector ² . |
| Appendix 2 - Factors Guiding the Identification of Potential Priorities and Actions in Future Work Programs | |
| Factors Guiding the Identification of Potential Priorities and Actions in Future Work Programs | I agree with factors guiding the identification of potential priorities and actions in future work programs. I think that in this case the IFAC needs to observe the fund applied for these matters considering the cost of the process. |
| Appendix 3 – Objectives of Our Outreach Activities and How we Liase and Communicate with our key stakeholders. | |

¹<http://www.coso.org/documents/COSO%20Press%20Release%20Sustainability%20Thought%20Paper%20PDF.pdf>

²<http://www.ifac.org/sites/default/files/publications/files/PPP3-Standard-Setting-in-the-Public-Interest.pdf> and <http://www.ifac.org/sites/default/files/publications/files/Policy%20Position%20Paper%204%20For%20Issue.pdf>

| Description | Comments |
|--|---|
| Objectives of Our Outreach Activities and How We Liaise and Communicate with Our Key Stakeholders | The cooperation and collaboration with key stakeholders and the key international regulators are important for development and discussion with transparency of the matter, principally with detection of problems and difficulties in the application of standards. This information is the same that question a,III. |

The IAASB invites any other comments that you believe are important to provide input to the IAASB for the purpose of developing its future strategy.

Additional questions for respondents have been included in the accompanying consultation on the Work Program for 2015–2016, including whether the proposed initiatives are consistent with, and are the best means of serving, the IAASB’s three proposed strategic objectives.

Proposed Work Program for 2015–2016

The IAASB is particularly interested in respondents’ views on:

- (a) The approach taken to the development of the Work Program for 2015–2016, in particular the IAASB’s decision to focus on fewer key projects towards the goal of their completion by 2017.

| Description | Comments |
|--|--|
| Planned Priorities and Actions for 2015–2016 | |
| In particular, the IAASB proposes that the following topics be prioritized in 2015–2016 in the public interest: | |
| Quality control | I agree with the quality control, because this point has relation with internal process in the organization with Integrated Reporting ³ and Auditor Reporting ⁴ . |
| Professional skepticism | The professional skepticism is very important for critical assessment. I understand that with new research about measure is very important development this project. ⁵ |
| Special audit considerations relevant to financial institutions | This point has direct impact with the results of The European Commission - EC that includes European Parliament backs Commission proposals on new rules to improve the quality of statutory audit. |
| In addition, the IAASB has prioritized: | |
| Liaison and dialogue with key stakeholders about audit quality and other topics | This point has relation with Appendix 3 of this proposal Objectives of Our Outreach Activities and How We Liaise and Communicate with Our Key Stakeholders. |

³ <http://www.theiirc.org/international-ir-framework/>

⁴ <https://www.ifac.org/auditing-assurance/auditor-reporting-iaasbs-1-priority>

⁵ <http://www.ifac.org/sites/default/files/publications/files/IAASB%20Professional%20Skepticism%20QandA-final.pdf>

| Description | Comments |
|--|--|
| Efforts in support of adoption and implementation of the IAASB's new and revised Auditor Reporting standards | This point has relation with High Quality Financial Statements Audits that impact training of professionals and principally a new focus for the universities in relation the account profession. |
| Development of a process for post-implementation reviews of the IAASB's other assurance and related services standards | This point has relation with High Quality Financial Statements Audits that impact training of professionals and principally a new focus for the universities in relation the account profession. |
| Information-gathering related to certain topics, in particular Integrated Reporting and group audits | This point has relation with Quality of Control that develops with transparency the aspects of internal control of the organization. |

(b) The appropriateness of the topics chosen as the focus for the Work Program for 2015–2016 (see paragraph 4 of the Work Program and Table A on pages 26–29) in light of the strategic objectives set out in the IAASB's Strategy for 2015–2019.

| DESCRIPTION | COMMENTS | |
|--|---|---|
| | LETTER B Table A (pages 26–29) | LETTER C Appendix 1 (pages 39-41) |
| <p>Quality Control Consideration of issues related to ISQC 1, <i>Quality Control for Firms that Perform Audits and Reviews of Financial Statements, and Other Assurance and Related Services Engagements</i>, and related provisions of ISA 220, <i>Quality Control for an Audit of Financial Statements</i></p> <ul style="list-style-type: none"> <input type="checkbox"/> Revision of requirements and guidance addressing Engagement Quality Control Reviews (EQCRs) <input type="checkbox"/> Review of clarity of provisions relating to using the work of a specialist and an auditor's expert <input type="checkbox"/> Consideration of areas highlighted by the IAASB's work on its <i>Framework for Audit Quality</i>, for example in relation to a firm's culture, engagement team competencies and capabilities, and sufficiency of resources and time to achieve a high-quality audit <input type="checkbox"/> Consideration of the need for further guidance to explain the applicability of ISQC 1 (e.g. for proportionate application, to other assurance and related services engagements, etc.) | I agree with the quality control, because this point has relation with internal process in the organization as in the Integrated Reporting and Auditor Reporting. | This point is very important for this moment for attends the letter C of this proposal. |
| <p>Professional Skepticism Consideration of how to reinforce the concept of professional skepticism in an audit</p> | The professional skepticism is very important for critical assessment. I understand that with new research about measure is very | This point is very important for this moment for attends the letter C of this proposal. |

| DESCRIPTION | COMMENTS | |
|---|--|--|
| | important development this project | |
| <p>Special Audit Considerations Relevant to Financial Institutions Consideration of enhancements to the ISAs and/or the development of guidance to:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Clarify and enhance the relationship between the banking supervisors and the bank's external auditors, as necessary and appropriate in light of the related efforts of the Basel Committee on Banking Supervision (Basel Committee) in this area <input type="checkbox"/> Address auditing issues of particular significance in audits of banks or other financial institutions and these entities' use of fair value accounting and related estimates, including but not limited to impairment and loan loss provisioning | This point has direct impact with the results of The European Commission - EC that includes European Parliament backs Commission proposals on new rules to improve the quality of statutory audit. | This point is very important for this moment for attends the letter C of this proposal. |
| Other Activities Planned for 2015–2016 | | |
| <p>Monitoring by the INFO Working Group of emerging developments related to assurance and related services, including in relation to <i>The International Integrated Reporting (<IR> Framework</i>³⁰ through observation of the International Integrated Reporting Council's (IIRC) Assurance Working Group</p> | This point has relation with the Information-gathering related to certain topics, in particular Integrated Reporting and group audits of this proposal. | This point already includes in the process of activities for attends letter c of this proposal. |
| <p>Auditor Reporting: Adoption and Implementation</p> <ul style="list-style-type: none"> <input type="checkbox"/> Actions to facilitate adoption and implementation of the new Auditor Reporting standards <input type="checkbox"/> Initial activities and planning for post-implementation review | This point has direct impact with Efforts in support of adoption and implementation of the IAASB's new and revised Auditor Reporting standards of this proposal. | This point already includes in the process of activities for attend letter c of this proposal, as Special Audit Considerations Relevant to Financial Institutions. |
| <p>Development of a process for post-implementation reviews of the IAASB's other assurance and related services standards</p> | This point has direct impact with Efforts in support of adoption and implementation of the IAASB's new and revised Auditor Reporting standards of this proposal. | This point already includes in the process of activities for attend letter c of this proposal, as Special Audit Considerations Relevant to Financial Institutions. |
| <p>Ongoing dialogue with key stakeholders including the International Accounting Standards Board (IASB), IFIAR, the International Organization of Securities Commissions (IOSCO), the Financial Stability Board (FSB), European Commission, US Public Company Accounting Oversight Board (PCAOB), the International Organization of</p> | This point has relation with the Objectives of Our Outreach Activities and How We Liaise and Communicate with Our Key Stakeholders of | This point already includes in the process of activities for attend letter c of this proposal, as Quality Control |

| DESCRIPTION | COMMENTS | |
|--|---|---|
| Supreme Audit Institutions (INTOSAI), NSS, audit firms, International Federation of Accountants (IFAC) Small and Medium Practices (SMP) Committee and other IFAC member bodies as relevant | this proposal. | |
| Activities to support the use of the IAASB's <i>Framework for Audit Quality</i> by audit firms and other stakeholders | These points have relation with Develop and Maintain High-Quality ISAs that Are Accepted as the Basis for High-Quality Financial Statement Audits of this proposal. | This point already includes in the process of activities for attend letter c of this proposal, as Quality Control |
| Information-gathering activities related to projects commencing in 2017 | | |
| Further Details on New Priority ISA/ISQC Projects Commencing in 2015–2016 | | |

- (c) Whether there is an action(s) or project(s) that has not been included in the Work Program for 2015–2016 that you believe the IAASB should address during that period. For example, should any of the topics in Appendix 1 (on pages 39–41) be prioritized sooner? If so, which initiative(s) identified in Table A (on pages 26–29) do you believe should be replaced by this action(s) or project(s). Please provide an explanation of your views.

| Appendix 1 (pages 39-41) | |
|--|--|
| DESCRIPTION | COMMENTS |
| Overview of Possible Actions for Inclusion in Future Work Programs | The overview of possible actions for inclusion needs to observe these comments of The International Organization of Securities Commissions - IOSCO in relation "Research publishes paper on Corporate Bond Markets ⁶ and the CPSS-IOSCO post responses to consultation on the assessment methodology for the oversight expectations applicable to critical service providers ⁷ "; The Financial Reporting Council – FRC in relation "Revised operating procedures for reviewing corporate reports ⁸ " and the European Securities and Markets Security - ESMA about long term savings and investments ⁹ and highlight for cross-sectoral risks ¹⁰ , these matters can be useful for development of international standards elaborated for IFAC/IAASB. |
| ISA-Related Projects | These points need to observe with The Public Company Accounting Oversight Board - PCAOB discuss the Proposed Auditing Standards on the |
| Assurance, Reviews and Related Services Engagements | |

⁶ <http://www.iosco.org/news/pdf/IOSCONEWS326.pdf>

⁷ <http://www.iosco.org/news/pdf/IOSCONEWS325.pdf>

⁸ <https://www.frc.org.uk/Our-Work/Publications/Corporate-Reporting-Review/Consultation-Paper-Revised-operating-procedures-fo.aspx>

⁹ <http://www.esma.europa.eu/news/Steven-Maijoor%E2%80%99s-keynote-speech-EuroFinUse-Conference-Better-Finance-Manifesto?t=326&o=home>

¹⁰ <http://www.esma.europa.eu/European%20Supervisory%20Authorities%20highlight%20cross-sectoral%20risks?t=326&o=home>

| Appendix 1 (pages 39-41) | |
|---------------------------------|---|
| DESCRIPTION | COMMENTS |
| | <p>Auditor's Report and the Auditor's Responsibilities Regarding Other Information and Related Amendments that the results of discussion can improve this strategy of IFAC.</p> <p>In this case, The European Commission - EC¹¹ and the EUROPEAN FEDERATION OF ACCOUNTANTS AND AUDITORS FOR SMES – EFAA¹² elaborate the papers about results of research that includes European Parliament backs Commission proposals on new rules to improve the quality of statutory audit and The Implementing the New European Accounting Directive - Making the right choices, respectively.</p> <p>Finally the discussion about EPSAS elaborated for EUROSTAT of the European Commission¹³ and OECD¹⁴ with Governance Review for public sector.</p> |

(d) Whether there are alternative approaches for the IAASB to consider in order to enhance the IAASB's ability to address calls from stakeholders for IAASB efforts on a variety of important topics, in light of the constraints of available resources and the need for due process to be applied in the development or revision of standards.

| Input from ISA Implementation Monitoring Project, outreach activities, CAG, work of others (e.g., NSS) | | |
|---|---|----------------------------|
| 2 | Activities may include surveys, roundtables, consultation papers, information gathering, specific outreach, etc. as necessary | I agree with this comment. |
| 3&4 | Standard setting activities may not be the only response to issues identified –the most appropriate action and who is best placed to address the issue will be considered. Should standard-setting be necessary, the IAASB Steering Committee⁶⁰ and the CAG⁶¹ must be consulted on a project proposal, and the project must be approved by the IAASB in a public meeting | I agree with this comment. |
| 5 | Further consultation is undertaken if necessary. This may include a decision to conduct further field testing of the application of any new proposals or additional activities noted in no. 2 above. Consultation papers are published for public comment ordinarily no less than 60 days | I agree with this comment. |

¹¹ http://europa.eu/rapid/press-release_STATEMENT-14-104_en.htm?locale=en

¹² <http://www.efaa.com/files/pdf/Publications/Annual%20reports/2014/EFAA%20MSO%20in%20Accounting%20Directives%20Report%20140408.pdf>

¹³ http://epp.eurostat.ec.europa.eu/portal/page/portal/public_consultations/consultations/epsas

¹⁴ <http://www.oecd.org/gov/budgeting/IPSASB-Governance-Review.htm>

| Input from ISA Implementation Monitoring Project, outreach activities, CAG, work of others (e.g., NSS) | | |
|---|---|----------------------------|
| 6 | Ordinarily the development of an exposure draft necessitates discussion with the IAASB at least at two meetings before the IAASB meeting where the proposals will be approved. The exposure draft is also required to be discussed with the CAG. Exposure period for an exposure draft is ordinarily 120days | I agree with this comment. |
| 7 | Comments on exposure are analyzed and considered by the project task force, and presented to the IAASB with changes proposed as appropriate for deliberation. Once the changes are finalized, an assessment is made whether re-exposure is necessary based on whether substantial changes have been made from the exposure draft. The revised proposals are also required to be discussed with the CAG | I agree with this comment. |
| 8 | In setting the effective date, the IAASB considers the reasonable expected minimum period for effective implementation, including the need for translation into national languages | I agree with this comment. |
| 9 | Where appropriate, implementation activities undertaken may include among other activities “train the trainer” materials, webinars, etc. | I agree with this comment. |

The IAASB invites any other comments that you believe are important to provide input to the IAASB for the purpose of developing its future strategy and work programs.

Additional questions for respondents have been included in the accompanying consultation on the Proposed Strategy for 2015–2019, including whether the proposed strategic objectives are considered appropriate.

I suggest, for the board, if agrees, that observes some discussions as follows: The International Organization of Securities Commissions - IOSCO in relation “Research publishes paper on Corporate Bond Markets¹⁵ and the CPSS-IOSCO post responses to consultation on the assessment methodology for the oversight expectations applicable to critical service providers¹⁶”; The Financial Reporting Council – FRC in relation “Revised operating procedures for reviewing corporate reports¹⁷” and the European Securities and Markets Security - ESMA about long term savings and investments¹⁸ and highlight for cross-sectoral risks¹⁹, these matters can be useful for development of international standards elaborated for IFAC/IAASB.

¹⁵ <http://www.iosco.org/news/pdf/IOSCONEWS326.pdf>

¹⁶ <http://www.iosco.org/news/pdf/IOSCONEWS325.pdf>

¹⁷ <https://www.frc.org.uk/Our-Work/Publications/Corporate-Reporting-Review/Consultation-Paper-Revised-operating-procedures-fo.aspx>

¹⁸ <http://www.esma.europa.eu/news/Steven-Maijoor%E2%80%99s-keynote-speech-EuroFinUse-Conference-Better-Finance-Manifesto?t=326&o=home>

¹⁹ <http://www.esma.europa.eu/European%20Supervisory%20Authorities%20highlight%20cross-sectoral%20risks?t=326&o=home>

Other point has relation with the meeting of The G20²⁰ that I consider very important include the information of The Financial Stability Board²¹ in the meeting of April 10-11/2014, some decisions can increase the discussions principally with relation valuation and risk analysis (financial reforms).

The Public Company Accounting Oversight Board - PCAOB²² describes in the Proposed Auditing Standards on the Auditor's Report and the Auditor's Responsibilities Regarding Other Information and Related Amendments that the results of discussion can improve this strategy of IFAC.

The European Commission - EC²³ and the EUROPEAN FEDERATION OF ACCOUNTANTS AND AUDITORS FOR SMES – EFAA²⁴ elaborate the papers about results of research that includes European Parliament backs Commission proposals on new rules to improve the quality of statutory audit and The Implementing the New European Accounting Directive - Making the right choices, respectively.

In this case, the process of internal control and the importance about audit quality elaborated for IFAC²⁵ and the Framework elaborated for COSO²⁶ is very important for Integrated Reporting²⁷ and XBRL²⁸ included with the modifications of Auditing Standards.

So, I consider that the research about corporate governance in the Financial Reporting Council FRC²⁹ and the results of discussions in the European Commission Internal Markets³⁰, can be improve the international standards for public and private sector.

Thank you for opportunity for comments this proposal; if you have questions do not hesitate contact to me, rio1042370@terra.com.br.

Yours,

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²⁰ https://www.g20.org/sites/default/files/g20_resources/library/Communique%20Meeting%20of%20G20%20Finance%20Ministers%20and%20Central%20Bank%20Governors%20Washington%20DC%2010-11%20April%202014_0.pdf

²¹ https://www.g20.org/sites/default/files/g20_resources/library/Financial%20Reforms%20Update%20on%20Progress.pdf

²² <http://pcaobus.org/Rules/Rulemaking/Pages/Docket034.aspx>

²³ http://europa.eu/rapid/press-release_STATEMENT-14-104_en.htm?locale=en

²⁴ <http://www.efaa.com/files/pdf/Publications/Annual%20reports/2014/EFAA%20MSO%20in%20Accounting%20Directives%20Report%20140408.pdf>

²⁵ <https://www.ifac.org/auditing-assurance/focus-audit-quality>

²⁶ <http://www.coso.org/documents/FINAL%20News%20Release%20-->

[%20How%20Frameworks%20Improve%20Organizational%20Performance%20and%20Governance%20--%202010%2014.pdf](http://www.coso.org/documents/FINAL%20News%20Release%20--%20How%20Frameworks%20Improve%20Organizational%20Performance%20and%20Governance%20--%202010%2014.pdf)

²⁷ <http://www.theiirc.org/consultationdraft2013/>

²⁸ http://www.ifrs.org/XBRL/Resources/Documents/ITI_ByFS_2014_IR1_complete.pdf

²⁹ <http://www.frc.org.uk/Our-Work/Publications/FRC-Board-Speech-by-Stephen-Haddrill-at-Brussels-event-on-En.aspx>

³⁰ http://ec.europa.eu/internal_market/auditing/news/index_en.htm