

Our Ref: STA/001

30 June 2019

International Auditing and Assurance Standards Board (IAASB)
529 Fifth Avenue, 6th Floor,
New York, NY 10017
United States of America

Submitted via website: www.iaasb.org

Dear Sir/Madam

EXTENDED EXTERNAL REPORTING (EER) ASSURANCE - IAASB CONSULTATION PAPER

The Institute of Certified Public Accountants of Uganda (ICPAU) appreciates the opportunity to respond to the Extended External Reporting (EER) Assurance Consultation Paper

Our comments are herein attached.

We hope you will find our comments helpful.

Yours sincerely,



CPA Charles Lutimba
MANAGER, STANDARDS AND TECHNICAL SUPPORT

Institute of Certified Public Accountants of Uganda

Appendix: Comments to the Extended External Reporting (EER) Assurance Consultation Paper

EK/....

COMMENTS ON THE IAASB CONSULTATION PAPER ABOUT EXTENDED EXTERNAL REPORTING (EER) ASSURANCE

The International Auditing and Assurance Standards Board (IAASB) issued a Consultation Paper about the Extended External Reporting Assurance. This is part of the Board's efforts to formulate a guidance document for practitioners in the application of International Standard on Assurance Engagements (ISAE) 3000 (Revised). Below are comments from the Institute of Certified Public Accountants of Uganda (ICPAU) in regards to the Consultation Paper.

QUESTION 1: Does the draft guidance adequately address the challenges for practitioners that have been identified as within the scope of the draft guidance developed in phase 1? If not, where and how should it be improved?

COMMENT:

ICPAU believes that the draft guidance doesn't adequately address all the challenges for practitioners in applying ISAE 3000 (Revised) to assurance engagements over EER as identified by the 2016 Discussion Paper, Supporting Credibility and Trust in Emerging Forms of External Reporting. Areas which need further clarity include the following:

- Determining the scope of EER engagements. The Consultation Paper doesn't adequately reduce the complexity of determining the scope of these engagements.
- Demonstration about how professional skepticism and professional judgment can be exercised in EER engagements. The only demonstrations of this is the assessment of the ability of an entity's internal control to produce sufficient appropriate evidence for the EER report as well as consideration of materiality of misstatements of subject matter information included in the EER report.

QUESTION 2: Is the draft guidance clear and easy to understand, including through the use of examples and diagrams, and the way terminology is used? If not, where and how should it be improved?

COMMENT:

ICPAU believes that the draft guidance is clear and easy to understand, including the use of examples and diagrams, and the way the terminology is used.

QUESTION 3: Do you support the proposed structure of the draft guidance? If not, how could it be better structured?

COMMENT:

ICPAU supports the proposed structure of the draft guidance because structuring the guidance into chapters helps practitioners to easily identify the specific areas of the

guidance to which they want to refer. The chapters make it easy to establish what the different paragraphs address.

QUESTION 4: Do you agree that the draft guidance does not contradict or conflict with the requirements or application material of ISAE 3000 (Revised), and that the draft guidance does not introduce any new requirements?

COMMENT:

ICPAU agrees that the draft guidance doesn't contradict or conflict with the requirements or application material of ISAE 3000 (Revised).

QUESTION 5: Do you agree with the way that the draft guidance covers matters that are not addressed in ISAE 3000 (Revised)?

COMMENT:

No. ICPAU believes that the draft guidance does not address all the matters that are not addressed in ISAE 3000 (Revised). This is especially true because the challenges that were identified by the practitioners in the application of ISAE 3000 (Revised) are not sufficiently addressed. This means that the application of the standard will remain problematic until these challenges are satisfactorily addressed by the IAASB.

QUESTION 6: Do you agree that the additional papers contain further helpful information and that they should be published alongside the authoritative guidance document?

COMMENT:

ICPAU agrees with the publication of additional papers alongside the authoritative guidance document. For example, the Four Key Model for Credibility and Trust in relation to EER elaborates how credibility and trust can be enhanced in EER engagements and this is one of the driving factors for the formation of the paper.