

## Response Template for the Invitation to Comment Before the IAASB Finalizes the Narrow Scope Amendments to the ISQMs and ISAs for the IAASB PIE Track 2 Project

### Guide for Respondents

Comments are requested by **March 27, 2025**.

This template is for providing comments on the matters set out in the Invitation to Comment (ITC) for the pre-final narrow scope amendments to the International Standards on Quality Management (ISQMs) and the International Standards on Auditing (ISAs) as a Result of the Revisions to the Definitions of Listed Entity and Public Interest Entity (PIE) in the IESBA Code. It also allows for respondent details, demographics and other comments to be provided. Use of the template will facilitate the IAASB's automated collation of the responses.

You may respond to all questions or only selected questions.

To assist our consideration of your comments, please:

- For each question, start by indicating your overall response using the drop-down menu under each question. Then below that include any detailed comments, as indicated.
- When providing comments:
  - Respond directly to the questions.
  - Provide the rationale for your answers. If you disagree with the proposals as explained in the ITC, please provide specific reasons for your disagreement. If you agree with the proposals, it will be helpful for the IAASB to be made aware of this view.
  - Avoid inserting tables or text boxes in the template when providing your responses to the questions because this will complicate the automated collation of the responses.
- Submit your comments, using the response template only, without a covering letter or any summary of your key issues, instead identify any key issues, as far as possible, in your responses to the questions.

The response template provides the opportunity to provide details about your organization and, should you choose to do so, any other matters not raised in specific questions that you wish to place on the public record. All responses will be considered a matter of public record and will ultimately be posted on the IAASB website.

Use the “**Submit Comment**” button on the IAASB [web page](#) to upload the completed template.

**Responses to IAASB's ITC for the Pre-Final Narrow Scope Amendments to the ISQMs and ISAs as a Result of the Revisions to the Definitions of Listed Entity and PIE in the IESBA Code**

**PART A: Respondent Details and Demographic information**

Your organization's name (or your name if you are making a submission in your personal capacity)	Grant Thornton International Ltd
Name(s) of person(s) responsible for this submission (or leave blank if the same as above)	R. Trent Gazzaway
Name(s) of contact(s) for this submission (or leave blank if the same as above)	Katherine Schamerhorn Claire Revenig
E-mail address(es) of contact(s)	<a href="mailto:Katherine.Schamerhorn@gti.gt.com">Katherine.Schamerhorn@gti.gt.com</a> <a href="mailto:Claire.Revenig@us.gt.com">Claire.Revenig@us.gt.com</a>
Geographical profile that best represents your situation (i.e., from which geographical perspective are you providing feedback on the ITC). Select the most appropriate option.	<a href="#">Global</a>
	If "Other", please clarify
The stakeholder group to which you belong (i.e., from which perspective are you providing feedback on the ITC). Select the most appropriate option.	<a href="#">Accounting Firm</a>
	If "Other", please specify
Should you choose to do so, you may include information about your organization (or yourself, as applicable).	

Should you choose to do so, you may provide overall views or additional background to your submission. **Please note that this is optional.** The IAASB's preference is that you incorporate all your views in your comments to the questions.

**Information, if any, not already included in responding to the questions in Part B:**

## PART B: Responses to Specific Questions in the ITC

**For each question, please start with your overall response by selecting one of the items in the drop-down list under the question. Provide your detailed comments, if any, below as indicated.**

1. You are invited to share any observations that you believe might be relevant to the IAASB prior to finalizing the narrow scope amendments to the ISQMs and ISAs.

Please note:

- *This ITC does not extend to and is not inviting comment on the IESBA PIE revisions read together with the IESBA clarification. IESBA's Listed Entity and PIE project is complete.*
- *If you submitted a comment letter to ED-PIE Track 2 in April 2024, the IAASB has fully considered those responses during its deliberations in September and December 2024; therefore, it is not necessary to repeat comments previously provided. You may believe that a specific matter remains relevant to share as an observation here, in which case the request is that you please clearly relate such matter to the IAASB's decisions and rationale in this Post-Exposure Consultation. (See **Section IV**, paragraphs 23-32.)*

**Overall response:** Concur with the IAASB's position and rationale for finalizing the narrow scope amendments (no further observations)

**Detailed comments (if any):**

Specific questions on forward-looking matters (See ITC **Section V**):

- 2(a). Do you agree with the proposed effective date of the narrow scope amendments, i.e., for audits of financial statements for periods beginning on or after December 15, 2026, to be aligned with the standards from the Going Concern and Fraud projects? (See **Section V**, paragraphs 35-37.)

**Overall response:** Agree, with comments below

**Detailed comments (if any):**

We agree with the proposed effective date of the narrow scope amendments and alignment with the effective dates from the Going Concern and Fraud projects. As noted in our PIE Track 2 comment letter submitted April 8, 2024, we continue to believe early adoption of the PIE Track 2 project should be tied to early adoption of both ISA 570 (Revised 2024) and ISA 240 (Revised) to prevent piecemeal adoption of standards impacting the auditor's report. We agree with the Board's discussion at their December 2024 meeting to address early adoption in the Basis for Conclusion for each project.

- 2(b). Do you agree with the IAASB's commitment to revisit the decision to adopt the definition of PIE in the IESBA Code (adapted as necessary for the ISQMs and ISAs) and extending differential requirements to apply to audits of PIEs? (See **Section IV**, paragraph 31 and **Section V**, paragraph 38.)

Please note: When the decision is revisited, the IAASB will develop an exposure draft for public consultation. Therefore, you do not now need to provide comments or to repeat comments previously provided regarding the extant differential requirements in the ISQMs and ISAs.

**Overall response:** [Agree, with comments below](#)

**Detailed comments (if any):**

We agree with the overarching objective and purpose of the PIE Track 2 project to establish differential requirements across the IAASB standards to meet heightened expectations of stakeholders regarding the performance of audit engagements for certain entities, thereby enhancing confidence in audit engagements performed for those entities. As noted in our PIE Track 2 comment letter submitted April 8, 2024, we believe that the PIE Track 2 project objective to adopt the definition of PIE in the IESBA Code into ISQM 1 and ISA 200 is not operational unless there is a global baseline definition of PIE that is consistently applied across jurisdictions. We believe that the decision to revisit such project to adopt the definition of PIE in the IESBA Code into ISQM 1 and ISA 200 and extend differential requirements to audits of PIEs should be conditional on two events occurring: 1) adoption of the IESBA Code PIE revisions across jurisdictions is sufficient to create a global baseline definition of PIE; and 2) the results of the IESBA's post-implementation review of the IESBA PIE revisions, planned to commence in 2027, has been completed. We believe that close coordination between both boards once these two conditions are met will be critical to ensuring the interoperability of the standards and consistency in practice.

2(c). Do you agree with the proposed timing for revising the matters highlighted in 2(b) above? (See **Section V**, paragraphs 39-41.)

**Overall response:** [Neither agree/disagree, but see comments below](#)

**Detailed comments (if any):**

We question whether IAASB staff will have sufficient information regarding broader adoption of the IESBA PIE revisions in the second half of 2026 to have an effective discussion about the decisions to adopt the definition of PIE in the IESBA Code (adapted as necessary for the ISQMs and ISAs) and extending differential requirements to apply to audits of PIEs. We believe that any such discussion at the IAASB should be conditional on two events occurring: 1) adoption of the IESBA Code PIE revisions across jurisdictions is sufficient to create a global baseline definition of PIE; and 2) the results of the IESBA's post-implementation review of the IESBA PIE revisions, planned to commence in 2027, has been completed.