

RESPONSE TEMPLATE FOR THE ED OF PROPOSED NARROW-SCOPE AMENDMENTS TO IAASB STANDARDS ARISING FROM THE IESBA'S USING THE WORK OF AN EXTERNAL EXPERT PROJECT

Guide for Respondents

Comments are requested by **July 24, 2025**.

This template is for providing comments on the Exposure Draft (ED) of proposed Narrow-Scope Amendments to International Auditing and Assurance Standards Board® (IAASB®) Standards Arising from the International Ethics Standards Board for Accountants' (IESBA) Using the Work of an External Expert project, in response to the questions set out in the Explanatory Memorandum (EM) to the ED. 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 in the ED, please provide specific reasons for your disagreement and specific suggestions for changes that may be needed to the requirements, application material or appendices. If you agree with the proposals, it will be helpful for the IAASB to be made aware of this view.
 - Identify the specific aspects of the ED that your response relates to, for example, by reference to sections, headings or specific paragraphs in the ED.
 - 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 ED [web page](#) to upload the completed template.

Responses to IAASB's Request for Comments in the EM for the ED, Proposed Narrow-Scope Amendments to IAASB Standards Arising from the IESBA's Using the Work of an External Expert Project

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)	Katherine.Schamerhorn@gti.gt.com Claire.Revenig@us.gt.com
Geographical profile that best represents your situation (i.e., from which geographical perspective are you providing feedback on the ED). Select the most appropriate option.	<u>Global</u>
	If "Other", please clarify
The stakeholder group to which you belong (i.e., from which perspective are you providing feedback on the ED). Select the most appropriate option.	<u>Firm (audit or assurance practitioners)</u>
	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 (also, the last question in Part B allows for raising any other matters in relation to the ED).

Information, if any, not already included in responding to the questions in Parts B and C:

PART B: Responses to Questions in the EM for the ED

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.

Overall Question

Public Interest Responsiveness

1. Do you agree that the proposed narrow-scope amendments are responsive to the public interest, considering the qualitative standard-setting characteristics and standard-setting actions in the project proposal? If not, why not?

(See EM, Section 1-A)

Overall response: Agree, with comments below

Detailed comments (if any):

We agree with the purpose and scope of the IAASB's project to consider narrow scope amendments arising from IESBA's project on Using the Work of an External Expert in order to maintain the interoperability of the IAASB standards with the new provisions in the IESBA's *International Code of Ethics for Professional Accountants (including International Independence Standards)* (the Code) related to using the work of an expert, as described in the Background section of the ED.

Specific Questions

Proposed Narrow-Scope Amendments to ISA 620¹

2. Do you agree that the proposed narrow-scope amendments to ISA 620 are appropriate to maintain interoperability with the new provisions in the Code related to using the work of an external expert?

(See EM, Section 1-C)

Overall response: Agree, with comments below

Detailed comments (if any):

We agree with the IAASB's proposed narrow-scope amendments to ISA 620 and the rationale for such amendments, as well as the rationale provided for potential amendments that were considered and ultimately deemed unnecessary. We believe the resulting proposed amendments, which focus on adding application material and examples from the Code instead of adding additional performance requirements, provide an appropriate balance of promoting interoperability while remaining framework neutral. Specifically:

- Paragraph 19: We agree that no change is needed to the ISA 620 definition of "auditor's expert."
- Paragraph 22: We agree with the proposed sub-requirement to ISA 620 paragraph 8(f) to refer to relevant ethical requirements and related examples from the Code added in application material.

¹ International Standard on Auditing (ISA) 620, *Using the Work of an Auditor's Expert*

- Paragraph 23: We agree that revisions to ISA 620 paragraph 9 are unnecessary and support the proposed application material referring the auditor to the relevant ethical requirements.
- Paragraphs 24 and 29: We agree that the implicit presumption in ISA 620 that the work of an auditor's expert cannot be used if the auditor concludes that the expert does not have the necessary competence, capability, and objectivity for the auditor's purpose is sufficient. We agree that interoperability of this implicit requirement can be promoted through proposed application material and reordering existing application material.
- Paragraphs 26 and 27: We agree that revisions to ISA 620 paragraph 11 are unnecessary and support 1) the proposed application material referring the auditor to the relevant ethical requirements; and 2) additions to the Appendix related to considerations for agreement between the auditor and an auditor's expert.
- Paragraphs 29 and 30: We agree that revisions to ISA 620 paragraph 13 are unnecessary and support the proposed application material to clarify the link between ISA 620 paragraphs 9 and 12.

If you do not agree, what alternatives do you suggest (please identify the specific paragraphs and be specific as to why you believe the proposals are not appropriate, and why you believe your alternatives would be more appropriate)?

Detailed comments (if any):

Proposed Narrow-Scope Amendments to ISRE 2400 (Revised),² ISAE 3000 (Revised)³ and ISRS 4400 (Revised)⁴

3.1 Do you agree that the proposed narrow-scope amendments to ISRE 2400 (Revised) are consistent with the proposed amendments to ISA 620, and are appropriate to maintain interoperability with the new provisions in the Code related to using the work of an external expert?

(See EM, Section 1-D)

Overall response: Agree, with comments below

Detailed comments (if any):

² International Standard on Review Engagements (ISRE) 2400 (Revised), *Engagements to Review Historical Financial Statements*

³ International Standard on Assurance Engagements (ISAE) 3000 (Revised), *Assurance Engagements Other than Audits or Reviews of Historical Financial Information*

⁴ International Standards on Related Services (ISRS) 4400 (Revised), *Agreed-upon Procedures Engagements*

We agree with the IAASB's proposed narrow-scope amendments to ISRE 2400 (Revised) and the rationale for such amendments. We believe the resulting proposed amendments, which focus on adding application material and examples from the Code instead of adding additional performance requirements, are consistent with the proposed amendments to ISA 620 and are appropriate to maintain interoperability with the new provisions in the Code related to using the work of an external expert. Specifically:

- Paragraphs 32 and 33: We support the proposed application material related to using the work performed by an expert, which is consistent with proposed amendments to ISA 620.

If you do not agree, what alternatives do you suggest (please identify the specific paragraphs and be specific as to why you believe the proposals are not appropriate, and why you believe your alternatives would be more appropriate)?

Detailed comments (if any):

3.2 Do you agree that the proposed narrow-scope amendments to ISAE 3000 (Revised) are consistent with the proposed amendments to ISA 620, and are appropriate to maintain interoperability with the new provisions in the Code related to using the work of an external expert?

(See EM, Section 1-E)

Overall response: Agree, with comments below

Detailed comments (if any):

We agree with the IAASB's proposed narrow-scope amendments to ISAE 3000 (Revised) and the rationale for such amendments, as well as the rationale provided for potential amendments that were considered and ultimately deemed unnecessary. We believe the resulting proposed amendments, which focus on adding application material and examples from the Code instead of adding additional performance requirements, are consistent with the proposed amendments to ISA 620 and are appropriate to maintain interoperability with the new provisions in the Code related to using the work of an external expert. Specifically:

- Paragraph 34: We agree that no change is needed to the ISAE 3000 (Revised) definition of "practitioner's expert."
- Paragraphs 35 and 37: We agree that ISAE 3000 (Revised) paragraphs 32(b)(i) and 70 are not within the scope of this project.
- Paragraph 36: We agree that revisions to ISAE 3000 (Revised) paragraph 52 are unnecessary and support the proposed application material, which is consistent with ISA 620.

If you do not agree, what alternatives do you suggest (please identify the specific paragraphs and be specific as to why you believe the proposals are not appropriate, and why you believe your alternatives would be more appropriate)?

Detailed comments (if any):

3.3 Do you agree that the proposed narrow-scope amendments to ISRS 4400 (Revised) are consistent with the proposed amendments to ISA 620, and are appropriate to maintain interoperability with the new provisions in the Code related to using the work of an external expert?

(See EM, Section 1-F)

Overall response: Agree, with comments below

Detailed comments (if any):

We agree with the IAASB's proposed narrow-scope amendments to ISRS 4400 (Revised) and the rationale for such amendments, as well as the rationale provided for potential amendments that were considered and ultimately deemed unnecessary. We believe the resulting proposed amendments, which focus on adding application material and examples from the Code instead of adding additional performance requirements, are consistent with the proposed amendments to ISA 620 and are appropriate to maintain interoperability with the new provisions in the Code related to using the work of an external expert. Specifically:

- Paragraph 38: We agree that no change is needed to the ISRS 4400 (Revised) definition of "practitioner's expert."
- Paragraphs 39 and 41: We agree that ISRS 4400 (Revised) paragraphs 19-20 and 31 are not within the scope of this project.
- Paragraph 40: We agree that revisions to ISRS 4400 (Revised) paragraph 29 are unnecessary and support the proposed application material which is consistent with ISA 620.

If you do not agree, what alternatives do you suggest (please identify the specific paragraphs and be specific as to why you believe the proposals are not appropriate, and why you believe your alternatives would be more appropriate)?

Detailed comments (if any):

Other Matters

4. Are there any other matters you would like to raise in relation to the ED? If so, please clearly indicate the standard(s), and the specific requirement(s) or application material, to which your comment(s) relate.

Overall response: No other matters to raise



Detailed comments (if any):

Part C: Request for General Comments

The IAASB is also seeking comments on the matters set out below:

5. Translations—Recognizing that many respondents may intend to translate the final narrow-scope amendments for adoption in their own environments, the IAASB welcomes comment on potential translation issues respondents note in reviewing the ED.

Overall response: No response

Detailed comments (if any):

6. Effective Date—Given the public interest benefit of aligning the effective date of these proposed narrow-scope amendments with the effective date of the revised Code provisions related to using the work of an external expert, the IAASB believes that an appropriate implementation period would be approximately 12 months after the PIOB's process of certification of the final narrow-scope amendments. The IAASB welcomes comments on whether this would provide a sufficient period to support effective implementation of the narrow-scope amendments.

(See EM, Section 1-G)

Overall response: See comments on effective date below

Detailed comments (if any):

We support the proposed effective date and believe a 12-month implementation period is sufficient given 1) proposed amendments do not add new performance requirements; and 2) audit firms are in the process of revising their methodologies to comply with the effective date of the revised IESBA Code provisions which the narrow scope amendments in this proposal refer to.