

August 2, 2019

AICPA Auditing Standards Board
Sherry Hazel — Sherry. Hazel @aicpa-cima.com

RE: Proposed Statement on Auditing Standards and Proposed Statement on Standards for Attestation Engagements: Amendments to the Description of the Concept of Materiality.

Dear Committee Members:

The Illinois CPA Society (ICPAS) is a statewide membership organization, with over 24,000 professionals, dedicated to enhancing the value of the CPA profession. Founded in 1903, ICPAS is one of the largest state CPA societies in the United States of America. ICPAS represents Illinois CPAs in public accounting and consulting, corporate accounting and finance, not-for-profit, government and education organizations as well as affiliate member groups for students, educators, international professionals and related non-CPA finance professionals.

The ICPAS Audit and Assurance Services Committee (the "Committee" or "we") is pleased to comment on the proposed Statement on Auditing Standards and proposed Statement on Standards for Attestation Engagements: Amendments to the Description of the Concept of Materiality dated June 5, 2019. The organizational and operating procedures of the Committee are reflected in the attached Appendix A to this letter. These comments and recommendations represent the position of the Committee rather than any individual members of the Committee, the organizations with which such members are associated, or the ICPAS Board.

Specific Requests for Comment

Revised Definition of Materiality

Please provide your views on whether the wording of the amendments is consistent with the
definition of materiality used by the U.S. judicial system and other U.S standard setters and
regulators. If the wording is not consistent, please identify the areas of inconsistency and
suggest alternate wording.

Response: The Committee agrees that the proposed wording of the amendment is consistent and provides more definitive guidance as to materiality thresholds.

Consistency with Current Practice

2. Please provide your views on whether the proposed amendments will change how auditors determine materiality in an audit or attestation engagement. If the amendments would result in a change, how would the change affect those engagements?

Response: In practice auditors generally tend to be conservative in assessing materiality and already predominately operate under the materiality thresholds of the U.S. judicial system and other U.S standard setters and regulators. Therefore, we believe the proposed amendments would not substantially change how auditors determine materiality in an audit or attestation engagement.

The Committee appreciates the opportunity to express its opinion on this matter. We would be pleased to discuss our comments in greater detail if requested.

Scott Cosentine, CPA

Chair, Audit and Assurance Services Committee

Genevra D. Knight, CPA

Vice Chair, Audit and Assurance Services Committee



APPENDIX A

AUDIT AND ASSURANCE SERVICES COMMITTEE ORGANIZATION AND OPERATING PROCEDURES 2019-2020

The Audit and Assurance Services Committee of the Illinois CPA Society (Committee) is composed of the following technically qualified, experienced members. The Committee seeks representation from members within industry, education and public practice. These members have Committee service ranging from newly appointed to almost 20 years. The Committee is an appointed senior technical committee of the Society and has been delegated the authority to issue written positions representing the Society on matters regarding the setting of audit and attestation standards. The Committee's comments reflect solely the views of the Committee, and do not purport to represent the views of their business affiliations.

The Committee usually operates by assigning Subcommittees of its members to study and discuss fully exposure documents proposing additions to or revisions of audit and attestation standards. The Subcommittee develops a proposed response that is considered, discussed and voted on by the full Committee. Support by the full Committee then results in the issuance of a formal response, which at times includes a minority viewpoint. Current members of the Committee and their business affiliations are as follows:

Public Accounting Firms:

National:

Todd Briggs, CPA RSM US LLP Scott Cosentine, CPA Ashland Partners & Company LLP Jennifer E. Deloy, CPA Marcum LLP James J. Gerace, CPA BDO USA, LLP Michael R. Hartley, CPA Crowe LLP James R. Javorcic, CPA Mayer Hoffman McCann P.C. Huong Nguyen, CPA PricewaterhouseCoopers LLP Elizabeth J. Sloan, CPA **Grant Thornton LLP** Amber Sarb, CPA RSM US LLP Richard D. Spiegel, CPA Wipfli LLP Timothy Van Cott, CPA Sikich LLP

Grant Thornton LLP

Regional:

Daniel Voogt, CPA

Michael Ploskonka, CPA Selden Fox, Ltd.
Genevra D. Knight, CPA Porte Brown LLC
Andrea L. Krueger, CPA CDH, P.C.

Local:

Timothy Delany, CPA
Arthur Gunn, CPA
Arthur S. Gunn, Ltd.
Arthur S. Gunn, Ltd.
CJBS LLC
Mary Laidman, CPA
DiGiovine, Hnilo, Jordan & Johnson, Ltd.

Carmen F. Mugnolo, CPA Mugnolo & Associates, Ltd.
Jodi Seelye, CPA Mueller & Company LLP



Industry/Consulting:

Rosi Hasan, CPA Northern Trust Corporation Sean Kruskol, CPA Cornerstone Research

Educators:

Meghann Cefaratti, PhD Northern Illinois University

Staff Representative: Heather Lindquist, CPA Illinois CPA Society