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

1. 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
- Scott Cosentine, CPA
- Jennifer E. Deloy, CPA
- James J. Gerace, CPA
- Michael R. Hartley, CPA
- James R. Javorcic, CPA
- Huong Nguyen, CPA
- Elizabeth J. Sloan, CPA
- Amber Sarb, CPA
- Richard D. Spiegel, CPA
- Timothy Van Cott, CPA
- Daniel Voogt, CPA

  - RSM US LLP
  - Ashland Partners & Company LLP
  - Marcum LLP
  - BDO USA, LLP
  - Crowe LLP
  - Mayer Hoffman McCann P.C.
  - PricewaterhouseCoopers LLP
  - Grant Thornton LLP
  - RSM US LLP
  - Wipfli LLP
  - Sikich LLP
  - Grant Thornton LLP

**Regional:**
- Michael Ploskonka, CPA
- Genevra D. Knight, CPA
- Andrea L. Krueger, CPA

  - Selden Fox, Ltd.
  - Porte Brown LLC
  - CDH, P.C.

**Local:**
- Timothy Delany, CPA
- Arthur Gunn, CPA
- Lorena C. Johnson, CPA
- Mary Laidman, CPA
- Carmen F. Mugnolo, CPA
- Jodi Seelye, CPA

  - Pier & Associates, Ltd.
  - Arthur S. Gunn, Ltd.
  - CJBS LLC
  - DiGiovine, Hnilo, Jordan & Johnson, Ltd.
  - Mugnolo & Associates, Ltd.
  - Mueller & Company LLP
Industry/Consulting:
  Rosi Hasan, CPA
  Sean Kruskol, CPA

Northern Trust Corporation
Cornerstone Research

Educators:
  Meghann Cefaratti, PhD

Northern Illinois University

Staff Representative:
  Heather Lindquist, CPA

Illinois CPA Society