

December 3, 2012

ISACA  
Director of Professional Standard Development  
3701 Algonquin Road, Suite 1010  
Rolling Meadows, IL 60008

By e-mail: [standards@isaca.org](mailto:standards@isaca.org)

**Re: ITAF™ IS Audit and Assurance Standards Exposure Draft**

The New York State Society of Certified Public Accountants (NYSSCPA), representing more than 28,000 CPAs in public practice, industry, government and education, welcomes the opportunity to comment on the above captioned exposure draft.

The NYSSCPA's Technology Assurance Committee deliberated the exposure draft and prepared the attached comments. If you would like additional discussion with us, please contact Karina Pinch, Chair of the Technology Assurance Committee at (585) 733-5836, or Ernest J. Markezin, NYSSCPA staff, at (212) 719-8303.

Sincerely,

  
Gail M. Kinsella

Gail M. Kinsella  
President

Attachment

**NEW YORK STATE SOCIETY OF  
CERTIFIED PUBLIC ACCOUNTANTS**

**COMMENTS ON**

**ITAF™ IS AUDIT AND ASSURANCE STANDARDS EXPOSURE DRAFT**

**December 3, 2012**

**Principal Drafter**

**Yigal Rechtman**

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Ernest J. Markezin  
William R. Lalli

# New York State Society of Certified Public Accountants

## Comments on

### ITAF™ IS Audit and Assurance Standards Exposure Draft

The New York State Society of CPAs Technology Assurance Committee has learned of the issuance of the exposure draft, *ITAF™ IS Audit and Assurance Standards* (“the exposure draft”), and we appreciate the opportunity to comment on it.

In general, we support ITAF’s focus on ISACA material, and believe that it provides a single source for IT audit and assurance professionals to seek guidance, research policies and procedures, and to obtain audit and assurance programs, and develop effective reports. However, we have concerns with the exposure draft in its current form and make the following general observations and comments:

#### **The audit standard in the exposure draft significantly overlaps and contradicts existing and well established authoritative literature**

The American Institute of Certified Public Accountants promulgates *Generally Accepted Auditing Standards* (GAAS), which is followed by financial auditors and has been the recognized standard for auditing by numerous national and international regulatory bodies. The Public Company Accounting Oversight Board refers to GAAS in a modified manner in its own *Auditing Standards*. The *Internal Auditing Standards*, promulgated by the Institute of Internal Auditors is also an established standard.

These auditing standards, including the assurance services that relate and refer to them, are well synchronized. They have also undergone a thorough public comment process prior to being published. Accordingly, publishing auditing standards that contradict these authoritative standards in an overlapping domain would cause unnecessary confusion and be disadvantageous to the auditors and the users of their reports without providing sufficient clarification as to how and where specifically the ITAF IS Audit and Assurance Standards apply.

#### **The audit framework in the exposure draft is unclear about its authority and target audience**

In certain sections there are references to internal audits, while in others, the discussion is so general as to imply inclusion of any auditors who are ISACA members, including certified public accountants who are also subject to other auditing and professional standards. It is unclear from the exposure draft what authority the proposed IS auditing standard rests on. Auditors who refer to an auditing standard may be called to defend their work based on the standard they applied (or should have applied). Ambiguous language in a standard or a contradiction between standards can put the burden of proof on an auditor to their detriment.

**Organization of the proposed auditing standards does not lend itself to an effective and efficient commentary and due process**

The language in the exposure draft is at times vague, and there are very few paragraph numbers to which easy reference can be made. There is extensive use of bulleted lists which do not lend themselves easily to specific reference and citation.

We believe that it would be productive and appropriate to closely align the exposure draft more with existing authoritative standards and ensure clarity where standards in the exposure draft may supplement other existing authoritative standards or may pertain to IS audits that fall outside of the authority of existing standards.

We appreciate the opportunity to comment on the exposure draft and we would be pleased to discuss this with you in further detail. We thank you for your consideration of our thoughts on this matter.