GRANT THORNTON LLP
Grant Thornton Tower
171 N. Clark Street, Suite 200
Chicago, IL 60601-3370

D +1 312 856 0200
S linkd.in/grantthorntonus
twitter.com/grantthorntonus

June 30, 2026

Auditing Standards Board
AICPA
1345 Avenue of the Americas
27th floor
New York, NY 10105

Via Email to commentletters@aicpa-cima.com

Re: Proposed Statement on Standards for Attestation Engagements, *Common Concepts, Examination Engagements, Review Engagements, and Engagements to Report on Sustainability Information*

Proposed Statement on Standards for Attestation Engagements, *Amendments to SSAE Nos. 18-19 and 21 to Reflect Proposed SSAE Common Concepts, Examination Engagements, Review Engagements, and Engagements to Report on Sustainability Information*

Dear Board members and staff:

Grant Thornton LLP appreciates the opportunity to comment on Proposed Statement on Standards for Attestation Engagements (SSAE), *Common Concepts, Examination Engagements, Review Engagements, and Engagements to Report on Sustainability Information* (Proposal) and Proposed SSAE, *Amendments to SSAE Nos. 18-19 and 21 to Reflect Proposed SSAE Common Concepts, Examination Engagements, Review Engagements, and Engagements to Report on Sustainability Information* (Conforming Amendments Proposal). We respectfully submit for the Board's consideration our comments, along with responses to the questions within the Proposal and Conforming Amendments Proposal, which are included in Appendix 1 to this letter. Appendix 2 to this letter provides additional editorial and drafting recommendations.

Clarity and consistency

A central theme in our responses is the importance of maintaining clarity, usability, and internal consistency within the attestation standards. While we support the Board's overall objectives, we are concerned that certain aspects of the Proposal

© 2026 Grant Thornton LLP | All rights reserved | U.S. member firm of Grant Thornton International Ltd.

introduce unnecessary structural complexity through extensive reorganization, increased use of headings and subheadings, and duplicative or inconsistently applied terminology. In several areas, these changes appear to detract from the intuitive flow and navigability that practitioners rely on when applying the standards. We believe the extant framework provides a well-understood and functional foundation and that revisions should prioritize enhancing understandability and coherence rather than introducing structural changes that may not clearly improve application or enhance quality in practice.

Scalable requirements

We also believe it is critical that the proposed requirements remain proportionate to the level of assurance and appropriately calibrated to the nature of the engagement. Certain revisions, particularly those affecting evidence, risk assessment, and the use of specialists in review engagements, appear to introduce a level of effort that is not aligned with the objective of limited assurance. In our view, this approach risks diminishing the distinction between reasonable and limited assurance, which could lead to inconsistent application and reduced clarity for users. Ensuring that requirements are appropriately scaled is essential to preserving the effectiveness and practicality of the attestation standards across a broad range of engagements, including maintaining an appropriate balance between costs and benefits.

Principles-based framework and professional judgment

We also emphasize the importance of preserving a principles-based framework that enables practitioners to exercise professional judgment across a wide range of subject matters. The strength of the attestation standards has historically been their flexibility and adaptability, allowing practitioners to design and perform procedures that are responsive to the specific risks and characteristics of each engagement. In several areas, however, the Proposal appears to introduce a level of prescriptiveness that may inadvertently constrain this judgment and reduce the standards' ability to be applied effectively across diverse engagements. We are concerned that making such changes to conform to a subject-matter specific standard that was drafted to converge with a standard that is designed for use by non-practitioners may not be in the best interest of our jurisdiction. We encourage the Board to maintain a principles-oriented approach, supported by clear objectives and appropriately targeted application material, to ensure the standards remain both robust and adaptable in practice.

Cost of change

Finally, we encourage the Board to apply a clear cost-benefit lens when considering the extent of proposed changes to the attestation standards. While we support efforts to enhance quality, we note that certain aspects of the Proposal introduce structural and conceptual changes that do not appear to be directly linked to identified deficiencies in practice or peer review findings. Changes of this nature may introduce additional complexity, implementation effort, and cost for practitioners and preparers, as well as other indirect and systemic costs across the profession, without a commensurate improvement in quality or usability. In our view, maintaining the stability of well-understood aspects of the existing framework, while focusing changes on areas where there is a demonstrated need, will better serve the public interest and support effective and consistent application of the attestation standards.

© 2026 Grant Thornton LLP | All rights reserved | U.S. member firm of Grant Thornton International Ltd.

****

We would be pleased to discuss our comments with you. If you have any questions, please contact Jennifer Cavanaugh, Chief Auditor, at 312-602-8715 or Jennifer.Cavanaugh@us.gt.com or Craig Woodfield, National Managing Partner of Assurance Quality and Risk, at 212-542-9735 or Craig.Woodfield@us.gt.com.

Sincerely,

/s/ Grant Thornton LLP

© 2026 Grant Thornton LLP | All rights reserved | U.S. member firm of Grant Thornton International Ltd.

Appendix

Responses to questions within the Proposal

Question 1. Do respondents agree, given the diverse subject matters, that the use of the “engagements beginning on or after” approach to trigger the adoption of the proposed SSAE is appropriate? If not, respondents are requested to explain why.

We are unaware of significant practice issues created by the current construct of effective dates for the SSAEs, including when the clarity project (SSAE No. 18) was issued as final. While we do not object to using engagements beginning on or after, we do believe the current approach of practitioner’s report date, which has historically been debated multiple times and reasonably implemented thereafter, would provide consistency with historical SSAE updates.

Question 2. Do respondents agree that if the final standard is issued no later than June 30, 2027, the proposed effective date for engagements beginning on or after June 15, 2029, is appropriate and provides adequate time for implementation, including updating methodologies and training staff? If not, respondents are requested to explain why and suggest a reasonable alternate effective date.

We agree with the proposed effective date provided in the Proposal.

Question 3. Do respondents agree with the approach taken with respect to the linkages between the proposed sustainability information AT-C sections and the other AT-C sections, including whether the approach is understandable and easy to follow? If not, respondents are requested to explain why.

While we believe the approach to using the phrases, “in applying” and “in accordance with” are understandable, we found the extensive use of headings and subheadings to be unwieldy and cumbersome. For example, in section 105, the “Preconditions for an Attestation Engagement” section contains 10 requirement paragraphs, separated by eight subheadings, effectively providing a subheading for nearly every requirement in that section. This appears unnecessarily complex. We are also concerned that, when a practitioner is reading individual standards, the headings could be confusing. For example, in section 105, the “Evidence” heading contains a subheading of

© 2026 Grant Thornton LLP | All rights reserved | U.S. member firm of Grant Thornton International Ltd.

“Sources of Information to be Used as Evidence” and another sub-subheading under that which is “Referred-to Practitioner.” Could this create confusion regarding the concept of sources of information to be used as evidence if it is only addressing referred-to practitioners?

We believe such challenges could be exacerbated if the Board undertakes revising the rest of the 300 series using the “building blocks” approach because the detailed approach taken in the Proposal creates an illogical flow in certain areas (for example, requirements related to evidence), which could create confusion for practitioners. We believe that, generally, the extant headings within the 200 series provide sufficient markers for the practitioner to navigate from the appropriate 200 section to the relevant 300 section. As such, we suggest retaining the extant headings and aligning the headings and subheadings in proposed sections 325 and 330 to match.

Question 4. Do respondents agree with the approach taken in structuring the attestation standards with respect to engagement resources and sources of information to be used as evidence? If not, respondents are requested to suggest an alternative such that the integrity of the building blocks approach is retained.

We found the approach, particularly with these two topics, to be confusing. As discussed further in our response to Question 3, we are concerned that the proposed approach appears to add complexity that may not be needed to achieve the intended objectives of the requirements. An alternative approach would be to simplify the headings and subheadings structure of the “building blocks” approach.

Question 5. Do respondents agree with moving requirements (and related application material) addressing “Documentation” in extant AT-C sections 205 and 210 to proposed AT-C section 105 given that this topic is typically common to all levels of service? If not, respondents are requested to explain why.

We do not agree with moving the requirements and related application material from extant sections 205 and 210 to proposed section 105. We believe such a change creates inconsistency with the original intention of section 105, which should include requirements relevant to all 200 series sections (with limited exceptions). The Proposal acknowledges that this approach created duplication with section 215. While we agree that unintended differences should be corrected, we ultimately believe that this change creates unnecessary cost without incremental benefit to quality or useability of the attestation standards. Therefore, we recommend the unintended differences be resolved by reverting the geography to the extant structure and correcting the minor unintended differences that were identified during the project. This would allow section 105 to remain fit for purpose for all 200 series sections with appropriate repetition within sections 205 and 210.

Question 6. Are there any other observations that respondents would like to provide with respect to significant matters that affect proposed AT-C section 105?

We provide the following additional observations regarding proposed section 105 for the Board’s consideration.

© 2026 Grant Thornton LLP | All rights reserved | U.S. member firm of Grant Thornton International Ltd.

- We agree with the Board's decision to retain the notion of subject matter being "based on" the criteria. We believe it is an important distinction that provides a specific benefit to the applicability of the attestation standards to all possible subject matters. We believe the proposed application material enhances the understandability of when "based on" would be appropriate as compared to "in accordance with," and we provide additional recommendations on this topic to further enhance the understandability of this topic.
- We also support the decisions made by the Board with regard to the suitability of criteria, including retaining the characteristics of suitable criteria in the application material.
- Proposed paragraph .70 lists items the practitioner should include in the engagement documentation, including the following.
  - f. the basis for the engagement partner's determination in accordance with paragraph .50 that sufficient appropriate evidence has been obtained.
  - h. the basis for the engagement partner's determination in accordance with paragraph .62a that the engagement partner's involvement has been sufficient and appropriate throughout the attestation engagement.

  It is unclear what the Board intends for the form, content, and extent of the documentation for these two requirements. If the basis for the conclusion is readily determinable from the documentation of the work performed or evidence obtained, does the basis need to be re-documented for purposes of meeting these requirements? Additional guidance as to the form, content, extent of the documentation for paragraphs .70(f) and (h) would be essential for the practitioner.
- We question the appropriateness of the heading, "Using the Work of a Participating Practitioner and Referred-to-Practitioner" for paragraphs .A84 – .A88 because the two separate topics are addressed under separate headings within the requirements section. We have concerns that referring to both participating practitioners and referred-to practitioners in this heading may create confusion about applicability of requirements and related application material to each distinct role, particularly since none of the application paragraphs under this heading are relevant to referred-to-practitioners. We recommend the heading refers to only using the work of a participating practitioner.
- We recommend deleting paragraphs .75,- .77 and .A121 as paragraph .08 addresses the applicability of the Statements on Quality Management Standards (SQMS). The selected quality management matters paragraphs .75,- .77 and .A121 could potentially undermine the responsibility of a firm to apply SQMS to attestation engagements. Additionally, some practitioners may question whether these requirements imply that some parts of SQMS are more important to attestation engagements than others. We believe these paragraphs were prompted by efforts to converge with ISSA 5000, which was designed to be used by nonaccountant practitioners, and as such, certain requirements that may be more explanatory in nature for their benefit are not necessary to include in the AT-Cs since practitioners in the United States are required to be CPAs and, as such, assumed to be familiar with SQMS.

© 2026 Grant Thornton LLP | All rights reserved | U.S. member firm of Grant Thornton International Ltd.

Please refer also to Appendix 2 to this letter for other editorial and drafting suggestions.

Question 7. Do respondents agree with the definition of management's specialist and whether, as drafted, it is fit for purpose? If not, respondents are requested to provide alternative wording for the term.

We agree with the definition of management's specialist and its related application material. We provide the following minor editorial revision for consideration in order to align the definition more closely with that in the auditing standards (suggested addition shown in bold italics).

> An individual or organization possessing expertise in a specialized field related to the subject matter or criteria whose work ***in that field*** is used by the responsible party to prepare or evaluate the subject matter.

Question 8. Do respondents agree with the ASB's approach in proposed AT-C sections 205 and 210 with respect to evidence? If not, respondents are requested to explain why. Feedback is requested specifically as it relates to the following:

- **Use of the term "evidence" in proposed AT-C section 210, as opposed to the extant term "review evidence"**
- **Inclusion of a requirement (see paragraph .17 of proposed AT-C section 210) for the practitioner to "evaluate information to be used as evidence" and whether the requirement is appropriately scalable for a review engagement**

Section 205

We support the Board's approach to proposed section 205 regarding the topic of evidence. We believe that the proposed changes, generally, will not create unnecessary incremental work effort by practitioners in examination engagements from the extant requirements. If the Board intends there to be additional work effort as a result of these changes, we encourage the Board to provide specific guidance as part of its adoption of a final standard.

Section 210

Generally, we do not support the Board's approach in proposed section 210 regarding the topic of evidence. We acknowledge the Board's views regarding "evidence" versus "review evidence;" however, we do not believe that the differentiation of sufficiency of evidence is as apparent in the proposed standard as it is in the current requirements. We believe that the difference in the term in extant section 210 is an important marker to practitioners that the nature and level of evidence obtained to achieve limited assurance is substantially lower than that needed to achieve reasonable assurance. Since this is a term that is clearly understood in our jurisdiction, we are concerned that eliminating the differentiated term could create confusion for practitioners and, thereby, introduce increased costs for this type of service as well as inconsistent application of the standard. Therefore, we believe that section 210, and AR-C section 90, should both retain the defined extant term "review evidence."

© 2026 Grant Thornton LLP | All rights reserved | U.S. member firm of Grant Thornton International Ltd.

In addition, we believe the introduction of proposed paragraph .17 of section 210 presents a significant change in work effort and related documentation for review engagements. We disagree that extant paragraph .19b is an appropriate premise for introducing this requirement because paragraph .19b relates to the data used to develop the practitioner's expectation, not necessarily the information or evidence obtained from the analytical procedure. For purposes of discussion, the Board should compare proposed paragraph .17 against extant paragraph .42, which requires the practitioner to evaluate the sufficiency and appropriateness of evidence obtained in the context of forming an overall conclusion about whether the practitioner is aware of any material modifications that should be made to the subject matter in order for it to be in accordance with the criteria (or for the responsible party's assertion to be fairly stated).

The extant requirement in paragraph .42 drives a holistic approach to evaluating the sufficiency and appropriateness of review evidence obtained in totality and whether such evidence supports the practitioner's conclusion. The proposed paragraph now requires the practitioner to evaluate the relevance and reliability of every piece of information at a much more granular level. We are concerned that this introduces an unnecessary level of work effort relative to the level of assurance being obtained as well as documentation effort that is not commensurate with this type of service. We acknowledge the application material proposed with paragraph .17, but we do not believe it sufficiently alleviates the challenges that the requirement, as proposed, presents, nor does it guide the practitioner in how to operationalize the requirement.

We believe the most appropriate approach to evaluating evidence for this type of service is provided by the extant standard, and we recommend the Board revert to a more holistic evaluation of evidence obtained, such as extant paragraph .42.

Question 9. Do respondents agree that the date of the practitioner's report and the report release date are typically so closely aligned that it is not necessary to draw a distinction between the two dates? If not, respondents are requested to describe how prevalent this circumstance may be in practice and provide examples.

We agree that it is not necessary to draw a distinction between the report date and report release date.

Question 10a. Respondents are requested to describe any practice issues or unintended consequences of which respondents are aware that may arise as a result of wording revisions to the proposed baseline attestation standards. These revisions include the following:

- **The use of "in accordance with" in the practitioner's reporting requirements, with the concept of "based on" being addressed in the application material.**
- **The revision of the phrase, when appropriate in the circumstances, from "when possible under applicable law or regulation" to "when practicable."**
- **The change in the use of the phrase from "statement that" or "state that" to "indicate that." Should this revision be applied elsewhere in the required reporting elements?**

© 2026 Grant Thornton LLP | All rights reserved | U.S. member firm of Grant Thornton International Ltd.

We are concerned that, if the reporting requirement itself in section 205 does not acknowledge the concept of "based on," practitioners could inadvertently infer that it is not allowed, regardless of what the application material says, since guidance cannot surpass or replace a requirement. We agree with the Board's observations that the notion of "based on" is necessary and important to retain. Therefore, we believe the following suggested change can mitigate possible misunderstanding, enhance the prominence of the option, and provide consistency of sections within the standard (suggested addition shown in bold italics).

> .102 the practitioner's report should include the following:
>
> …
>
> e. A statement that identifies the responsible party and its responsibility for the subject matter being in accordance with ***(or based on, as appropriate)*** the criteria or its assertion. (Ref.: par. .A165-.A166
>
> ….
>
> g.(ii) (1) the subject matter is in accordance with ***(or based on, as appropriate)*** the criteria, in all material respects (or equivalent language regarding the subject matter and criteria), or
>
> ….
>
> k. the practitioner's opinion about whether
>
> i. the subject matter is in accordance with the criteria ***(or based on the criteria, as appropriate)***, in all material respects, or …

We believe additional guidance could then address the circumstances where "based on" would be appropriate and also bridge any perceived "gap" in the requirements related to modifications of opinions, as we note the "in accordance" with language is the only option shown. We recommend reverting paragraph .A166 to extant language such that it also refers to the concept of "or based on."

Question 10b. Do respondents agree with layout, including the headings and sequencing of requirements and related application material, in the section under the heading "Modifications to the Practitioner's Report" in proposed AT-C sections 205 and 210? If not, respondents are requested to explain why.

We believe the approach taken in extant paragraph .48 of section 205, particularly with regard to the notion of withdrawing from the engagement, is more logical and easier to follow. The extant standard leaves the determination of whether to withdraw squarely within the process of evaluating the results of procedures performed. We believe this is more appropriate than intermingling the notion of withdrawal with the various reporting outcomes. Therefore, we recommend revising proposed paragraph .100 of section 205 with the following (additions shown in bold italics; deletions shown in strikethrough).

> .100 If the practitioner is unable to obtain sufficient appropriate evidence, a scope limitation exists and the practitioner should ***express a qualified opinion, disclaim an opinion, or withdraw from the engagement, when withdrawal is practicable. The practitioner should*** apply the requirements in paragraph***s***

© 2026 Grant Thornton LLP | All rights reserved | U.S. member firm of Grant Thornton International Ltd.

.114 – .115 and .118 – .124 ~~112a~~ when the practitioner is determining the type of opinion to be issued.

The revisions enable the section entitled "Modifications to the Practitioner's Report" to focus solely on the report content that results from the practitioner's conclusion, which we believe is clearer and easier to follow. Relatedly, we also recommend revising the lead-in of proposed paragraph .112 as follows (deletions shown in strikethrough).

> .112 The practitioner should ~~either~~ modify the opinion ~~or withdraw from the engagement when practicable~~ when the following circumstances exist and, in the practitioner's professional judgment, the effect of the matter is or may be material: …

In order to enhance adherence to the reporting requirements and the navigability of the Modifications section of the standard, we provide the following recommendations regarding paragraph ordering and headings. We note that, earlier in our letter we question the number of headings used throughout the proposed standards; however, we believe that, particularly for reporting, the use of headings and subheadings help ensure that reporting elements do not "get lost" in a practitioner's reading of the requirements. Specifically, we note that certain subheadings that exist in extant, and we believe are necessary, are proposed to be eliminated. We suggest reinstating them, as follows. For ease of review, we have not repeated the requirement paragraphs of section 205 in their entirety; rather, the paragraph numbering is based on the numbering as provided in proposed section 205 within the Proposal.

> **Modifications to the Practitioner's Report**
>
> ***Modified Opinions*** (new subheading to "Modifications to the Practitioner's Report")
>
> Paragraphs .112 through .118 and paragraphs .120 through .122
>
> **Description of Practitioner's Responsibility** (new subheading to "Modified Opinions")
>
> Paragraphs .124 and .123 (note reversed order so qualified/adverse opinion requirement comes before disclaimer)
>
> ***Other report modifications*** (new subheading to "Modifications to the Practitioner's Report")
>
> Paragraph .119

For the same reasons regarding adherence and navigability, we recommend similar revisions be made to proposed section 210.

Question 11a. Are the revisions to proposed AT-C sections 205 and 210 to address other information appropriate and actionable in the context of attestation engagements? If not, respondents are requested to explain why.

We do not believe addressing other information in a baseline attestation engagement is common, and therefore, we believe the extant requirements (section 205.58 and section 210.40), along with their related application material, sufficiently address the practitioner's responsibilities if the topic were to apply. We do not believe more robust

© 2026 Grant Thornton LLP | All rights reserved | U.S. member firm of Grant Thornton International Ltd.

requirements are necessary. In addition, we believe such requirements provide a sufficient “hook” to proposed sections 325 and 330, where the Board expects other information may be more common. Therefore, we recommend reverting to extant.

Question 11b. Do respondents agree with the ASB’s decision to exclude a definition of comparative information from proposed AT-C sections 205 and 210 and related performance and reporting requirements? If not, respondents are requested to explain why and to provide examples of non-sustainability attestation engagements where comparative information is presented and is important to an understanding of the subject matter.

Yes, we agree with the Board’s decision regarding the topic of comparative information.

Question 12. Given the variety of engagements that may be performed in accordance with proposed AT-C sections 205 and 210, respondents are requested to identify specific types of subject matter or attestation engagements, if any, that may be affected differently or disproportionately by revisions to the proposed AT-C sections. Respondents are requested to also specify how revisions to proposed AT-C sections 205 and 210 would be modified to avoid unintended different or disproportionate effects on certain subject matters or attestation engagements.

Consider an examination of management’s assertion that a user ID did not access a specific system during a specified period. Under the proposed standards, section 205 paragraph .36, the practitioner obtains an understanding, through risk assessment procedures, including inquiries and other procedures, of internal control over the preparation, measurement, or evaluation of the subject matter in accordance with (or based on) the criteria. Under extant, the practitioner obtains an understanding of internal control over the preparation of the subject matter relevant to the engagement. The additional procedures associated with the proposed revised requirement are not necessary in order for the practitioner to perform risk assessment and design procedures that enable the practitioner to obtain sufficient appropriate evidence to conclude if the user ID accessed the specific system during the time period specified in management’s assertion.

Also consider an examination of management’s assertion that products were shipped during a specified period of time and payment related thereto was received. Based on the subject matter, the practitioner can design procedures in response to the assessed risks that management’s assertion is materially misstated without obtaining an understanding, through risk assessment procedures, of internal control over the measurement or evaluation of the subject matter (that is, the understanding could be limited to just preparation of the subject matter). Unlike a financial statement audit, the engaging party is not asking for assurance on revenue recognition or whether the product was returned. The subject matter in the examination is specific and focused and, therefore, does not require extensive risk assessment procedures for a practitioner to obtain sufficient appropriate evidence on which to base their opinion.

Subject matter can be very simple, and the proposed requirements create a work effort that is not commensurate with the level of evidence necessary to obtain reasonable assurance. We are concerned the proposed standard will render these

© 2026 Grant Thornton LLP | All rights reserved | U.S. member firm of Grant Thornton International Ltd.

types of engagements cost prohibitive. We recommend that proposed paragraph .36 of section 205 revert to extant, which we believe provides clearer and more appropriate context and level of work required of the practitioner. The extant requirement also enables the practitioner to scale their understanding based on the circumstances of the engagement.

Question 13. Are there any other observations that respondents would like to provide with respect to the significant matters that affect both proposed AT-C sections 205 and 210?

For proposed section 205, we recommend moving proposed paragraph .107 (with its subheading) so that it immediately follows proposed paragraph .100. We believe such a change provides better context to the requirements of the "Content of the Report" section of proposed section 205, and we believe that, while the subheading relates to reporting, the practitioner contemplates whether to report on the assertion or directly on the subject matter while forming their opinion (that is, the heading of the relevant section we proposed moving it to). We believe a similar edit to proposed section 210 would also be helpful.

Question 14. Do respondents agree that the revisions to proposed AT-C section 205 appropriately align the requirements related to obtaining reasonable assurance in an examination engagement with the requirements in generally accepted auditing standards (GAAS) related to obtaining reasonable assurance in an audit of financial statements? If not, respondents are requested to explain why.

We agree with the Board's premise that reasonable assurance engagements would generally align with regard to requirements and related work effort; however, the subject matter for attestation engagements are not financial statements, and as such, it is appropriate for the requirements and related work effort to have differences. We are concerned that aligning certain concepts engrained in audits of financial statements with those of any and all other subject matter creates challenges with the implementation and operationalization of proposed section 205. Because the proposed requirements have moved away from being principles-based, they may be too prescriptive to allow the practitioner to exercise professional judgement to address the risk associated with an examination based on the subject matter. Refer to our response to Question 12 for more specific engagement examples.

Question 15. Do respondents agree with the approach taken by the ASB with respect to controls for purposes of proposed AT-C section 205 by limiting the applicability of certain requirements when the subject of the engagement is not internal control? If not, respondents are requested to explain why. Respondents are requested to also provide perspectives about whether the use of headings and application material is sufficient to enable the practitioner, when performing an examination engagement, to differentiate between requirements that are applicable to all subject matters and requirements that are relevant only when the subject matter of the engagement is not internal control.

We do not agree with the approach taken with respect to controls for purposes of proposed section 205. We believe the value of the attestation standards is their ability to be applied to a broad range of subject matters, and 205 is intended to be

© 2026 Grant Thornton LLP | All rights reserved | U.S. member firm of Grant Thornton International Ltd.

appropriately principles-based so that it can be applied to any subject matter. We believe the Board's proposed approach related to controls lessens the general operability of proposed section 205. We do not believe a framework of requirements that apply "*except for*" a particular subject matter is appropriate for section 205. We recognize the Board's expected future attest project related to internal controls in general. We would prefer the Board retain the extant requirements while it pursues that project in more detail in order to maintain the subject matter-agnostic nature of section 205. We do not believe that the issuance of Statement on Auditing Standards (SAS) No. 145, *Understanding the Entity and Its Environment and Assessing the Risks of Material Misstatement* suggests that the extant requirement is no longer fit for purpose or somehow contradictory to the updated risk assessment procedures in AU-C section 315.

Question 16. Are there any other observations that respondents would like to provide with respect to significant matters that affect proposed AT-C section 205?

We provide the following additional observations regarding proposed section 205 for the Board's consideration.

- Based on the examples provided in our response to Question 12, we recommend retaining the phrase "relevant to the engagement" particularly in proposed paragraph .36. When the subject matter is internal control, obtaining an understanding over internal control over the "preparation, measurement, or evaluation of internal control" may not be relevant to the engagement.
- We recommend adding the following guidance to proposed paragraph .37 to clarify the notion of key engagement team members and the possibility that not all engagement team members are "key" for purposes of the requirements.

  > *It is not always necessary or practical for the discussion to include all members in a single discussion (for example, in a multi-location attestation engagement), nor is it necessary for all the members of the engagement team to be informed of all the decisions reached in the discussion. The engagement partner may discuss matters with key members of the engagement team, including, if considered appropriate, those with specific skills or knowledge, while delegating discussion with others, taking into account the extent of communication considered necessary throughout the engagement team.*

- Paragraphs .115, .117, and .123(c) provide language to be used in the practitioner's report when a qualified opinion, adverse opinion, or disclaimer of opinion, respectively, are issued. The language provided will need to be revised if the subject matter is based on the criteria. Additional guidance should be included to explain that the language would be tailored by the practitioner if the examination of the subject matter is based on the criteria. We recommend additional guidance as follows.
  - Application material for paragraph .115: When the examination of the subject matter is based on the criteria, the practitioner tailors the qualified opinion paragraph for the engagement.

© 2026 Grant Thornton LLP | All rights reserved | U.S. member firm of Grant Thornton International Ltd.

- Application material for paragraph .117: When the examination of the subject matter is based on the criteria, the practitioner tailors the adverse opinion paragraph for the engagement.
- Application material for paragraph .123(c): When the examination of the subject matter is based on the criteria, the practitioner tailors the language in paragraph .123(c) for the engagement.

- We believe additional guidance is needed in order for practitioners to understand how to operationalize the guidance in proposed paragraph .A42 when materiality is not a quantitative measure. This guidance is difficult to understand in the context of when materiality is more qualitative.

Also refer to Appendix 2 to this letter for other editorial and drafting suggestions.

Question 17. Do respondents agree that the revisions to proposed AT-C section 210 are appropriate and that the proposed requirements maintain the integrity of an engagement to provide limited assurance? If not, respondents are requested to explain why.

Due to the Board's approach to requirements related to evaluating information to be used as evidence, we do not believe the revisions maintain the integrity of a limited assurance engagement. We provide detail regarding our objection to the requirements related to evidence in our response to Questions 8 and 18.

Question 18. Are there any other observations that respondents would like to provide with respect to significant matters that affect proposed AT-C section 210?

Similar to our objection to the evidence requirement (as discussed in our response to Question 8 above), we believe the requirements related to the use of the work of management's specialists are overly prescriptive and introduce a level of work that is not commensurate with obtaining limited assurance.

In our view, if the responsible party uses a management's specialist and the practitioner obtains that work, the use of that work would fall under the totality of evidence obtained by the practitioner and be subject to the more holistic requirement provided in extant section 210 for evaluating whether sufficient evidence was obtained to support the practitioner's conclusion. If the Board reverts to the extant evidence requirement, we believe application material specific to using the work of a management's specialist would be sufficient, particularly given how infrequently we believe this topic applies in a review.

Question 19: Do you agree with defining terms in proposed AT-C section 330, such as the risk of material misstatement, substantive procedures, and test of controls, with definitions that are similar, but not identical, to the definitions of the same terms in proposed AT-C section 205? If not, please explain why.

We do not agree with defining terms in proposed section 330 that are already, in principle, defined in section 205. We disagree with this approach for the following reasons.

© 2026 Grant Thornton LLP | All rights reserved | U.S. member firm of Grant Thornton International Ltd.

- We are concerned about the confusion that may result from having terms that are essentially interchangeable but defined differently. We have not identified incremental guidance or other information that enhances the practitioner's understanding of the requirements through use of these terms, so it is unclear why they would exist.
- We note that ISSA 5000 was created with the intent for nonpractitioners to utilize the standard, and, therefore, we believe, in our jurisdiction, it is unnecessary to define the terms in a specific or special manner for purposes of proposed section 330. We note that the proposed section 205 definitions would be applied to other subject matter specific sections in the 300 series and do not believe that proposed section 330 merits repeating defined terms.
- Finally, for the reasons above, we do not believe the omission of such definitions in section 330 would constitute a difference to be included in Appendix B.

Question 20: Do you agree that proposed AT-C sections 325 and 330 should not require communication with a predecessor practitioner prior to accepting an engagement to report on sustainability information? If not, please explain why. In responding to this question, please also provide your perspectives on what practical challenges there may be when communicating with a predecessor practitioner (notwithstanding the relevant ethical responsibilities outlined in the AICPA Code of Professional Conduct) and, if possible, how these challenges may be overcome.

We agree that there should not be required communications with a predecessor practitioner prior to accepting an engagement to report on sustainability information. We believe it would be most appropriate for such communication to be a consideration (that is, application material) and, ultimately, left to the judgment of the practitioner based on the circumstances of the engagement and the practitioner's risk management policies. Such application material already exists within the Proposal at paragraph .A45 of proposed section 105. Therefore, we believe no action is needed by the Board to further address this topic, unless the Board agrees to add subject matter specific considerations to proposed sections 325 and 330. Still, we do not believe such additional guidance is necessary.

Question 21a: Do you agree that the practitioner's reports on sustainability information should include management's responsibility for the design, implementation, and maintenance of internal control relevant to the preparation of sustainability information? If not, please explain why. Please also inform us whether such language is currently included in your examination or review reports issued in accordance with the attestation standards.

We agree with the inclusion of the management's responsibilities language in the practitioner's report. We believe it provides balance and clarity with regard to management's responsibilities for sustainability information.

Question 21b: Do you agree that the phrases "at the underlying assertion level for the disclosures" and "at the disclosure level" will be understandable and meaningful to users? If not, what revisions should be made to the practitioner's

© 2026 Grant Thornton LLP | All rights reserved | U.S. member firm of Grant Thornton International Ltd.

report to distinguish examination and review reports in an engagement to report on sustainability information?

While we believe that such phrases might provide helpful context in the practitioner's report, we note that the notion of "users" of sustainability information is quite broad and the market need for such information continues to evolve. As such, we do not have a strong view with regard to including or excluding such phrases. Nevertheless, we believe that existing examination and review reports on sustainability information are sufficiently distinct based on the standards under which such engagements are currently performed (sections 205 and 210, respectively).

Question 22a: Do you agree with the definition of comparative information in proposed AT-C sections 325 and 330? If not, please explain why and provide an alternative definition.

We question whether a definition of "comparative information" is necessary in proposed sections 325 and 330. Please refer to our response to Question 22b below for additional context with respect to concerns regarding comparative information.

Question 22b: Do you agree that the proposed requirements and related application material are clear and sufficiently principles-based to allow for practice to develop in this area, especially given the evolving jurisdictional landscape as it relates to sustainability information? If not, please explain why.

While we find these requirements improve on a number of elements when compared to ISSA 5000, we are concerned that the requirements are difficult to understand or follow, which may result in differences in practical application. This would likely be exacerbated given the current maturity of reporting in this area, which may be subject to substantial future shifts that cannot currently be anticipated.

Further, the proposed approach introduces unnecessary confusion by including a definition of "comparative information" and incremental requirements beyond those included in the proposed revisions to sections 105, 205, and 210. While many existing subject matters outside of sustainability information may include presentation of information that would otherwise meet the definition of "comparative information," the Board determined it would be inappropriate to include such requirements within proposed sections 205 and 210. For these reasons, we believe the definition and performance requirements for comparative information that are included in the proposed sections 325 and 330 should be removed. We believe, consistent with other subject matter areas, that the practitioner could apply the "Other Information" requirements in proposed sections 205 and 210 to sustainability information if presented for one or more prior periods.

Question 22c: Do you agree that the requirements (and related application material) addressing comparative information in proposed AT-C sections 325 and 330 are drafted such that there are no unintended convergence issues with the related performance and reporting requirements in ISSA 5000? If not, please explain why. In responding to this question, please provide your perspectives on what practical challenges there may be when performing an engagement to report on sustainability information (that includes comparative information) in accordance with both the attestation standards and ISSA 5000.

© 2026 Grant Thornton LLP | All rights reserved | U.S. member firm of Grant Thornton International Ltd.

In addition to the details included in our response to Question 22b above, we found that the proposed requirements and related application material addressing comparative information in proposed sections 325 and 330 were confusing and may produce unintended convergence challenges with the related performance and reporting requirements in ISSA 5000.

Given the current state of sustainability reporting, as well as the relatively recent and limited adoption of ISSA 5000 to date, we believe a practical and more operational option with respect to comparative information would be to remove the definition, performance requirements, and application material in totality and include this topic as an Appendix B difference. This recommendation would establish more consistency with the proposed changes to sections 205 and 210, while also establishing a clear pathway for practitioners who may need to perform a dual standards engagement that would also be subject to ISSA 5000.

Question 23: Are there any other observations that you would like to provide with respect to significant matters that affect both proposed AT-C sections 325 and 330? These matters may include convergence matters related to differences between the proposed SSAE and ISSA 5000.

We provide the following additional observation regarding proposed sections 325 and 330 for the Board's consideration.

- In paragraph .41 of proposed section 325 and paragraph .45 of proposed section 330, it is ambiguous as to what external specialists may be designated as "key." We recommend that additional clarity be added through application material to assist practitioners with this determination and promote consistent practical application.
- In paragraph .52 of proposed section 325 and paragraph .66 of proposed section 330, it is unclear why these requirements are not structured to align with the structure of the preceding paragraph and whether this difference in structure conveys a separate meaning. We recommend that these specified paragraphs be renamed and moved to item d. in the preceding paragraph in the absence of an intended difference in meaning.
- We believe that the language appearing at the end of paragraph .63 of proposed section 325 stating "for which the practitioner's assessment of the risk of material misstatement is close to the upper end of the spectrum of risk" should be removed. Given the requirement specifies "in applying proposed section 205.49," which requires a substantive response to assessed risks of material misstatement, regardless of whether such risk assessment is at the higher end of the spectrum of risk, we believe this additional language within proposed section 325 is not necessary and contradicts the requirements within proposed section 205.
- If the Board elects to retain the notion of the "spectrum of risk, we ask the Board to clarify whether the spectrum is in the context of a combined inherent risk and control reliance approach, as opposed to an inherent risk spectrum alone.
- We believe that some elements of the application material included within proposed sections 325 and 330 are too prescriptive to be included in the standards. While the guidance might be helpful, we recommend deleting the

© 2026 Grant Thornton LLP | All rights reserved | U.S. member firm of Grant Thornton International Ltd.

following proposed elements of application material from the proposed sections 325 and 330 and consider whether relocation to the AICPA Guide: *Attestation Engagements on Sustainability Information (Including Greenhouse Gas Emissions Information and Climate-Related Financial Disclosures)* would be more appropriate:

  - section 325: .A41, .A42, .A43, .A47, .A48, .A50, and .A71
  - section 330: .A52, .A53, .A54, .A58, .A59, .A61, and .A82

- Paragraph .A170 of proposed section 325 includes what appears to be contradictory guidance, specifically the following statements "...However, the practitioner may determine that the risks of material misstatement for those sustainability disclosures are at an acceptably low level. Irrespective of the assessed risks of material misstatement, proposed section 205 requires the practitioner to perform substantive procedures. The need to perform substantive procedures, and the extent of such procedures, is a matter of professional judgment in the circumstances...." We recommend that this guidance be revised to clarify when practitioners are to design and perform substantive procedures.
- Paragraph .A173 includes a statement regarding comparisons or reconciliations of substantive procedures performed at an interim date to period-end information, specifically stating that such procedures may include "perform substantive analytical procedures or tests of details to test the intervening period." We believe substantive-type procedures may not be applicable or necessary in all situations, depending on engagement facts and circumstances. We recommend this statement be revised to better reflect practitioner judgment in designing a response, such as by stating: "Perform procedures to test the intervening period."

Question 24: Do you agree that risk assessment procedures and further procedures are necessary in a review of sustainability information for the practitioner to obtain limited assurance to support the practitioner's conclusion? If not, please provide your perspectives about what requirements are necessary for the practitioner to obtain limited assurance to support the practitioner's conclusion.

We do not believe such extensive risk assessment procedures and further procedures are necessary in a review of sustainability information in order to obtain limited assurance. While we appreciate the desire for consistency in engagement execution within the profession, we are concerned that the extent of revisions in this area fundamentally changes the notion of limited assurance and instead blurs the lines with reasonable assurance.

We have concerns with respect to the establishment of a definition of "risk of material misstatement," within proposed section 330. While we understand that this definition promotes convergence with ISSA 5000, we believe it is important for the Board to distinguish between the different needs of potential practitioners that may use ISSA 5000 as compared to AICPA standards and be judicious in determining which paragraphs to converge with. Our position is that the establishment of such a definition along with other incremental risk assessment requirements within proposed section 330 creates inconsistency with proposed section 210, while also creating

© 2026 Grant Thornton LLP | All rights reserved | U.S. member firm of Grant Thornton International Ltd.

potential "spillover" effects for other future AICPA standards revisions. We also believe it diminishes a clear understanding for users of reports performed under AICPA attestation standards by introducing further ambiguity regarding the work effort and type of evidence obtained in a "limited assurance" engagement.

Question 25: Are there any other matters that you would like to raise in relation to the proposed SSAE?

We have no other matters to raise with regard to the Proposal, and we appreciate the Board's consideration of our feedback and recommendations.

Responses to questions within the Conforming Amendments Proposal

Question 1. Do respondents agree that the conforming amendments to proposed AT-C sections 305, 310, 315, 320, 206, and 215 are consistent with the corresponding proposed revisions to the baseline attestation standards and appropriate to maintain interoperability? If not, please explain the reasons, including if instances have been identified where additional conforming amendments are required to the AT-C sections to maintain interoperability with the proposed revised baseline attestation standards.

We generally agree with the conforming amendments. We provide the following feedback for the Board's consideration.

Section 315

- The proposed edits to paragraph 15, which eliminate "relevant portions" of internal control, diminish the clarity of the requirement regarding the scope and effort necessary regarding understanding internal controls. We recommend reinstating that language (refer to similar comments we provide in our comments on the Proposal).

Section 320

- Based on our feedback provided in Question 10b, we believe paragraph .42 should only address modifying the opinion and eliminate the notion of withdrawal, since that decision point should occur prior to preparing the service auditor's report.
- As written, paragraph .13 implies that, when management of the service organization refuses to provide a written assertion, withdrawal from the engagement would occur "when practicable," which is a different requirement than when possible under applicable law or regulation. Section 320 has historically been more restrictive than section 205. A written assertion from management is part of type 1 and type 2 reports, as stated in the definitions, and is a requirement of section 320. This proposed language changes the intent of the standard, and we believe it is not a conforming change. We recommend reverting paragraph .13 to extant.

© 2026 Grant Thornton LLP | All rights reserved | U.S. member firm of Grant Thornton International Ltd.

- We question whether paragraph .14 should still use the "as required by" language or if it would be more appropriate to use the "in accordance with" language used elsewhere in the standards.
- We are concerned that the proposed edits to paragraph .20 unnecessarily complicate an otherwise understandable requirement. We believe the proposed revisions incorporate drafting conventions intended for ISSA 5000, which may be used by nonpractitioners, whereas section 320 is used solely by practitioners, and, therefore, we do not believe the edits are necessary in our jurisdiction.
- With regard to the representation to be obtained from management in paragraph .36b, this representation is in addition to the representations obtained in section 205. The proposed deletion of "by management or the service organization's employees" changes the meaning of the representation and does not appear to be a conforming change. We recommend reverting paragraph .36b to extent or adding back "by management or the service organization's employees".
- With respect to the proposed deletion of the parenthetical in paragraphs .40q and .41q, we recommend reverting to extant. Based on the heading "Content of the Service Auditor's Report" and the first sentence of paragraphs .40 and .41, the parenthetical is needed as the information that was within the parenthetical is not included in the service auditor's report but rather provides information as to the appropriate dating of the report. Alternatively, the information that was within the parentheticals could be moved to a separate paragraph under a new heading, "Dating the Service Auditor's Report," immediately following paragraph .41, which would be consistent with the presentation in section 205 paragraph.103. This comment is also applicable to the similar change in the other section 300 proposed conforming amendments.
- Consistent with our response to Question 10b, we suggest revisions to paragraph .42. Additionally, the proposed elimination of "and the service auditor's report should contain a clear description of all the reasons for the modification" may have unintentional consequences as practitioners may conclude that the elimination of the phrase means that not all reasons for the modification need to be disclosed in the report. As such, we believe the proposed edit changes the intent of the standard and is not a conforming change. We recommend the following revisions to paragraph .42 (additions shown in bold italics, deletions shown in strikethrough).

  > .42 The service auditor should ~~either~~ modify the opinion***, and the service auditor's report should contain a clear description of all the reasons for the modification,*** ~~or withdraw from the engagement when practicable~~ when any of the following circumstances exist and, in the service auditor's professional judgment, the effect of the matter is or may be material based on the criteria in management's assertion:18A (Ref. par. .A73)

Section 215

- We believe that the documentation requirement requires a "hook" back to section 105 in order to signal to the practitioner that the requirement in section 215 does not stand alone but rather is incremental to the requirements in section 105.

© 2026 Grant Thornton LLP | All rights reserved | U.S. member firm of Grant Thornton International Ltd.

Question 2. Are there any other matters that respondents would like to raise in relation to this proposed SSAE? If so, clearly indicate the standard or standards, and the specific requirement or requirements or application material, to which the comment or comments relate.

We ask the Board to consider carefully the costs and benefits of transforming the 300 series of the SSAEs into the "building blocks" approach that is illustrated in the Proposal. We believe the 300 series, as it exists today, is reasonably understood albeit not used frequently beyond section 320. We believe that changes could be made to the baseline standards to enable interoperability between the 200 series and the 300 series without significant change to the 300 series. We believe that the profession's, including the Board and staff's, time and resources would be better spent on projects that address emerging audit areas, such as the auditor's use of technology, including artificial intelligence. Refer also to our response to Question 3 of the Proposal.

Question 3. Respondents are asked their views regarding whether the ASB should consider withdrawing AT section 701 as part of the current comprehensive project to revise the attestation standards.

We do not have a strong view regarding withdrawing AT section 701. We are unaware of its use in practice and acknowledge that the Board chose not to include it in its clarity project several years ago. We support whichever path the Board chooses to take.

© 2026 Grant Thornton LLP | All rights reserved | U.S. member firm of Grant Thornton International Ltd.

Appendix 2

Additional editorial and drafting suggestions

In addition to recommendations made in our responses to specific questions in Appendix 1. We provide the following additional editorial and drafting suggestions, organized by section number, for the Board's consideration (additions shown in ***bold italics***, deletions in ~~strikethrough~~).

Section 105, *Concepts Common to All Attestation Engagements*

- Paragraph .12: Limited assurance. A level of assurance that is substantially lower than the reasonable assurance obtained in an examination engagement but is at an acceptable level ~~as~~ ***to provide*** the basis for the conclusion expressed in the practitioner's review report.
- Paragraph .12: Subject matter information. The outcome of the measurement or evaluation of the underlying subject matter against criteria. An assertion about whether the underlying subject matter is in accordance with (or based ***on***) the criteria is a form of subject matter information. (Ref: par. .A25)
- Paragraph .69 ***The documentation of*** ~~In documenting~~ the nature, timing, and extent of procedures ~~performed, the practitioner~~ should ~~record~~ ***include the following***
- Paragraph .A22 Having practical experience in attestation engagements consists of possessing the competencies and skills that would ~~have~~ enable~~d~~ the practitioner to perform the engagement but does not mean that the practitioner is required to have performed comparable engagements.
- Paragraph .A58 includes a proposed addition that "Relevant criteria result in subject matter information that assists decision-making by the intended users." However, the intent of the subject matter information may be to inform users, rather than prompt a decision-making action. As proposed, there may be an unintended consequence that the criteria would not be considered relevant if the subject matter

© 2026 Grant Thornton LLP | All rights reserved | U.S. member firm of Grant Thornton International Ltd.

information is intended to inform users. We recommend reverting to extant or making the following revision (additions shown in bold italics).

> Relevance. Criteria are relevant to the underlying subject matter. Relevant criteria result in subject matter information that ***informs the intended users or*** assists decision-making by the intended users.

- Additionally, paragraph .A58 includes a proposed addition that "Complete criteria include, where relevant, benchmarks for presentation and disclosure." We believe that this sentence is not needed and could cause confusion as to when relevant, because if the criteria include presentation and disclosure requirements, those criteria would need to meet the characteristics of relevance, objectivity, measurability, and completeness. We recommend reverting to extant.
- We believe the proposed last sentence in paragraph .A73 is confusing and practitioners may be unclear as to its intended meaning, which may result in inconsistent application. We recommend deleting this sentence: "The engagement as a whole may also be misleading based on the engagement that the practitioner is engaged to perform."
- Paragraph .A95: …actual or suspected fraud involving individuals responsible for all or a portion of the subject matter of the engagement that could result in a material misstatement ~~in~~ ***of*** the subject matter…
- We recommend the following revision because the second sentence in paragraph .A114 states that if the practitioner determines to make reference to the report of a referred-to-practitioner in the practitioner's report, the requirements in paragraph .42 do not apply, which would include paragraph .42a (deletion shown in strikethrough).

> .A114 ~~Paragraph .42a requires the engagement partner to determine that sufficient and appropriate resources to perform the engagement are assigned or made available to the engagement team in a timely manner.~~ If the practitioner determines to make reference to the report of a referred-to practitioner in the practitioner's report, the requirements in paragraph .42 do not apply.

- We recommend deleting paragraph .A118 as it is duplicative of paragraph .68c. Additionally, the second sentence of paragraph .A118 does not provide additional guidance and may have the unintended consequence of introducing more questions, including whether documentation of relevant factors that impact the practitioner's professional judgment is only needed for "difficult questions of principle or professional judgment calls" and what is considered "difficult."

Section 205, *Assertion-Based Examination Engagements*

- Paragraph .04 - Management's specialist. An individual or organization possessing expertise in a specialized field related to the subject matter or criteria whose work is used by the responsible party to prepare***, measure,*** or evaluate the subject matter.
- We believe proposed paragraph .49 may be misinterpreted to imply there is only one appropriate level at which to design and perform procedures in an examination

© 2026 Grant Thornton LLP | All rights reserved | U.S. member firm of Grant Thornton International Ltd.

engagement. We recommend the following minor revision to paragraph .49 that could prevent such unintended consequences (additions shown in bold italics, deletion shown in strikethrough).

> .49 The practitioner should design and perform further procedures whose nature, timing, and extent are based on, and responsive to, the assessed risks of material misstatement, whether due to fraud or error, at ***an*** ~~the~~ appropriate level for the subject matter and in a manner that is not biased toward obtaining evidence that may be corroborative or toward excluding evidence that may be contradictory. …

- There are numerous references to "subject matter or assertion" within the proposed standard, for example, in paragraphs .51, .74b, .80 (a) – (c), .81, .81b, .83, among other paragraphs. We ask the Board to consider whether it is necessary to refer to "or assertion" since the term "subject matter" encompasses both underlying subject matter and subject matter information, and an assertion is a form of subject matter information.
- We propose the following revision to improve the clarity of proposed paragraph .59 (additions shown in bold italics, deletion shown in strikethrough).

> .59 Irrespective of the assessed risks of material misstatement, ***the practitioner should design and perform substantive procedures related to the subject matter, except*** when the subject matter ~~of the engagement~~ is ~~not~~ internal control~~, the practitioner should design and perform substantive procedures related to the subject matter~~.

- We propose moving the last sentence of proposed paragraph .69 to application and other explanatory material.
- Because only subsequent events that have a significant effect on the subject matter need to be reflected in the subject matter, we recommend the following revision to paragraph .80c (additions shown in bold italics).

> c. if an event is identified ***as having a significant effect on the subject matter*** as a result of the procedures performed pursuant to items (a) and (b),

- We propose the following edits to paragraphs .98 and .99 as the inclusion of "and content" implies the practitioner needs to evaluate/consider what is not present in the subject matter information, which may be outside the scope of the examination. Additionally, an assertion is a form of subject matter information and therefore we propose deleting (additions shown in bold italics, deletion shown in strikethrough).

> .98 The practitioner should evaluate, based on the evidence obtained, whether the ~~overall~~ presentation ~~and content~~ of the subject matter information ~~or assertion~~ is misleading within the context of the engagement. (Ref: par. .A157–.A158)

> .99 If the practitioner concludes that the ~~overall~~ presentation ~~or content~~ of the subject matter information ~~or assertion~~ is misleading within the context of the engagement, the practitioner should discuss the matter with the responsible party and, if appropriate, the engaging party and, depending on the requirements of the criteria and how the matter is resolved, should determine

© 2026 Grant Thornton LLP | All rights reserved | U.S. member firm of Grant Thornton International Ltd.

whether it is necessary to modify the opinion in the practitioner's report in accordance with paragraphs .112–.124.

- Paragraph .123: …Our responsibility is to express an opinion on [the subject matter or the responsible party's assertion] based on conducting the examination in accordance with attestation standards established by the AICPA. Because of the limitation on the scope of our examination discussed in [the ~~separate~~ ***preceding*** paragraph that describes the nature of the matter or matters giving rise to the modification], the scope of our work was not sufficient to enable us to express, and we do not express, an opinion on whether [the subject matter is in accordance with the criteria, in all material respects, or the responsible party's assertion is fairly stated].
- Paragraph .A34: The involvement of the engagement partner and other key members of the engagement team in planning the engagement draws on their experience and insight, thereby enhancing the effectiveness and efficiency of the planning process. The engagement partner may delegate portions of the planning and supervision of the engagement to other ~~firm personnel~~ ***engagement team members***.
- Paragraph .A43: Reliable ~~information~~ ***evidence*** is sufficiently accurate and complete.
- Paragraph .A47 is duplicate of the information in paragraph .25b and does not provide further guidance. We propose deleting paragraph .A47.
- Paragraph .A58: … evaluating the relevance and reliability of the information ~~intended~~ to be used as evidence in accordance with paragraph .25a; and …
- Paragraph .A65: …The extent to which the practitioner may need to modify or ***perform additional*** ~~add to the~~ procedures to resolve the doubts and the effect on other aspects of the engagement may vary.
- Paragraph .A71: The appropriate level at which to assess risks is based on the practitioner's professional judgment and will vary based on the subject matter of the examination engagement. For ~~many~~ ***some*** subject matters, for example, sustainability matters or pro forma financial information, …
- Paragraph .A78: When the engagement is carried out by a single individual, such as a sole practitioner, consideration of the matters referred to in paragraph .37 ~~nonetheless~~ may assist the practitioner in identifying and assessing risks of material misstatement.
- Paragraph .A79: Reporting policies are the bases, conventions, rules, and practices applied by an entity in preparing and presenting the subject matter information. The entity's reporting policies are not criteria ~~by themselves~~ but assist the entity in complying with the applicable criteria…
- As the subject matter of an examination is often not financial information and may not be tied to a reporting process, we recommend the following revision to paragraphs .A82 (additions shown in bold italics, deletion shown in strikethrough).

© 2026 Grant Thornton LLP | All rights reserved | U.S. member firm of Grant Thornton International Ltd.

.A82 - ….”Such inquiries may be useful in providing the practitioner with a perspective that is different from that of individuals ***responsible for the subject matter*** ~~in the reporting process~~…

- Paragraph .A88: Based on the understanding obtained in accordance with paragraphs ***.35 - .36*** ~~.45–.46~~, the practitioner may identify one or more control deficiencies…
- Paragraph .A117: … However, the practitioner’s legal responsibilities vary by jurisdiction, and in certain circumstances, the duty of confidentiality may be overridden by statute, regulation, courts of law, specific requirements of examinations of ~~responsible parties~~ ***entities*** that receive government financial assistance, or waived by agreement. …
- We recommend that paragraph .A168 move under the heading “Relevant Responsibilities.”
- We recommend the first example provided in paragraphs .A169 and A176 revert to extant. As for some examinations, the subject matter is presented based on criteria. Additionally, the proposed deletion may inadvertently imply that it would be incorrect to report on the subject matter being presented based on the criteria. When objectives are the criteria, the practitioner is determining if the objectives were achieved historically during a specific period of time and therefore, the past tense “achieved” would be used. We propose the following revisions to paragraphs .A169 and .A176 (additions shown in bold italics, deletions in strikethrough).

  ….

  - The subject matter is presented in accordance ***(based on)*** the criteria, in all material respects.
  - The subject matter ~~achieves~~ ***achieved*** the objectives ***during the period [date} through [date]***, in all material respects (when the objectives are the criteria).

  ….

- We recommend paragraph .A197 be deleted. It is unlikely in an examination that the practitioner will withdraw from an engagement for a scope limitation or will disclaim an opinion for a scope limitation. Paragraph .A197 implies this would be a likely scenario. Please also refer to our response to Question #10b, where we propose separating the determination of whether to withdraw from the engagement and the decision regarding which type of modified opinion is appropriate.

Section 325, *Reporting on an Examination of Sustainability Information*

- Paragraph .84 of proposed section 325 includes a reference to paragraph .80, which we believe should be .81 instead.

© 2026 Grant Thornton LLP | All rights reserved | U.S. member firm of Grant Thornton International Ltd.

Section 330, ***Reporting on a review of Sustainability Information***

- We believe paragraph .37 is unnecessary, as the engagement team discussion addressed by this requirement is adequately addressed by paragraph .54 of proposed section 330, which is appropriately included as a risk assessment procedure instead of a planning procedure.
- Specific to paragraph .54, and in consideration of this paragraph not including the "in applying" introductory language, we suggest replacing the phrase "and any key practitioners' external specialists" with "including any key practitioner's external specialists" to clarify this requirement.
- Specific to paragraph .68, we believe that items (i) and (ii) included within item (b) of this paragraph are also applicable to item (a) and recommend that the structure of this requirement be revised accordingly.

© 2026 Grant Thornton LLP | All rights reserved | U.S. member firm of Grant Thornton International Ltd.