

December 3, 2012

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

By e-mail: 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

NYSSCPA 2012 – 2013 Board of Directors

Gail M. Kinsella, <i>President</i>	Anthony T. Abboud William Aiken	Douglas L. Hoffman Scott Hotalen
J. Michael Kirkland, <i>President-elect</i>	Gregory J. Altman Barbara E. Bel	Eric M. Kramer Elliot A. Lesser
Scott M. Adair, <i>Secretary/Treasurer</i>	Shari E. Berk Robert W. Berliner	Pei-Cen Lin Steven M. Morse
Sherry L. DelleBovi, <i>Vice President</i>	Christopher G. Cahill Harold L. Deiters	Richard E. Piluso Robert R. Ritz
David Evangelista, <i>Vice President</i>	Domenick J. Esposito Adrian P. Fitzsimons	Michael F. Rosenblatt Arthur J. Roth
Suzanne M. Jensen, <i>Vice President</i>	Stephen E. Franciosa Jennifer R. George	Cynthia A. Scarinci John S. Shillingsford
Anthony J. Maltese, <i>Vice President</i>	Rosemarie A. Giovinazzo- Barnickel	Robert E. Sohr Yen D. Tran
Joanne S. Barry, <i>ex officio</i>	Mitchell L. Gusler Timothy Hedley	Richard T. Van Osten F. Michael Zovistoski

NYSSCPA 2012 – 2013 Accounting & Auditing Oversight Committee

William M. Stocker III, <i>Chair</i>	J. Roger Donohue	Renee Mikalopas-Cassidy
Michele B. Amato	Sharon S. Fierstein	Rita M. Piazza
Kenneth Chan	Julian E. Jacoby	Karina Pinch

NYSSCPA 2012 – 2013 Technology Assurance Committee

Karina Pinch, <i>Chair</i>	Patrick Helmes	Michael Pinch
Harvey Beringer	Lucas Kowal	Michael Pinna
Xin Chen	Joel Lanz	Yigal Rechtman
Christopher Cirrincione	Taylor Lehmann	Inga Sokolova
Matthew Clohessy	Yosef Levine	Thomas Sonde
David Daniels	Jane Nagashima	Bruce Sussman
Timothy Duemmel	Bruce Nearon	Joshua Wake
James Goldstein	Yossef Newman	Jason Wake
	Joseph O'Donnell	

NYSSCPA Staff

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.