

September 5, 2012

Ms. Amy Pawlicki
Director, Business Reporting, Assurance and Advisory Services
American Institute of Certified Public Accountants
1211 Avenue of the Americas
New York, N.Y. 10036-8775

By e-mail: apawlicki@aicpa.org

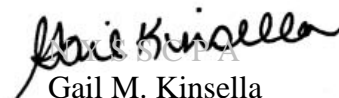
**Re: Exposure Draft – AICPA Assurance Services Executive Committee
Emerging Assurance Technologies Task Force
*Audit Data Standard***

Dear Ms. Pawlicki:

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) 545-6158, or Ernest J. Markezin, NYSSCPA staff, at (212) 719-8303.

Sincerely,


Gail M. Kinsella
President

Attachment

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

COMMENTS ON

**EXPOSURE DRAFT – AICPA ASSURANCE SERVICES EXECUTIVE COMMITTEE
EMERGING ASSURANCE TECHNOLOGIES TASK FORCE
*AUDIT DATA STANDARD***

September 5, 2012

Principal Drafter

Yigal Rechtman

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New York State Society of Certified Public Accountants

Comments on

Exposure Draft – AICPA Assurance Services Executive Committee Emerging Assurance Technologies Task Force *Audit Data Standard*

We have reviewed the AICPA Assurance Services Executive Committee Emerging Assurance Technologies Task Force exposure draft, *Audit Data Standard*, and we have the following comments on Section 2.6 GL Questionnaire, specifically questions 1. through 5. We have reprinted those selected questions in bold followed by our comments.

2.6 GL Questionnaire

The following information is integral to the understanding and use of the company's IT data. A company's financial management, in consultation with its IT personnel, should address each of the items, if applicable.

Exceptions to Audit Data Standards

1. Are there any exceptions to the audit data standards? For example

- **file formats (for example, not tab delimited, no header row, and so on).**
- **field formats (for example, no decimal point in numeric fields, alternative format for dates or times, and so on).**
- **records that should be excluded (for example, nonfinancial data, such as statistical or budget items).**
- **records that should have been included but were not available for this extract.**

With respect to fields that should not be created we caution the task force to avoid having fields with internal user information. Internal user information, other than a USER_ID field could be used for identity theft, "phishing" and other unauthorized activities. In addition, guidance should be provided that the USER_ID field should have a unique ID that is used only for external purposes and is not tied immediately to a real user. An internally maintained translation table should be used, with the USER_ID value in the XBRL instance being used for purposes of external users (and different than the values used by the issuing organization, internally).

With respect to records that should have been included but were unavailable in this extract, we propose that for the Journal ID's enumerated list, in addition to cd - cash disbursement, and cr - cash receipts, *et alia*, a record type that identifies a record as associated with integrated testing facilities (ITF), a continuous auditing method, be allowed. We propose two record types:

1. **ia** - to indicate that processing should occur but that the record should be recorded separately as it is a "dummy" record.

2. ib - to indicate that this record was selected for continuous auditing by an ITF. This would enable auditors to create records that will be associated with a continuous audit process.

GL

2. Is there an implicit structure for creating a unique Journal_ID field (for example, is it a concatenation of two or more other fields)?

The Journal_ID field should contain, in some form, a serial number for the journal entry. The purpose of a serial sequence in a journal record is to ascertain deleted, skipped or otherwise out of sequence journal records. The sequential numbering could be augmented with a hash-total value that will enhance the assurance that there has been no tampering with the record value.

3. When are journal entries recognized in the financial statements (for example, when entered, when approved, and so on)?

There should be a DATE_POSTED field. The value of this field should indicate posting information (such as the date posted) and not a simple "Yes" or "No" value. The presence of a value in the field is equivalent to a "Yes," while the value itself is a reference to the posting date to the financial statement.

4. Does the unique account number sequence capture classifications such as business units, subaccounts, and so on (account flexfield)?

The designation of account numbers vis-à-vis internal divisions, departments, industries, activities, etc. are too unique to be promulgated by this standard. We believe that it should be left to the issuing organization to assign the account number values.

5. How are related-party transactions identified (for example, transactions with wholly or partially owned subsidiaries)?

Related parties can be identified through the GL_ACCOUNT_NUMBER values. Identifying related parties in particular could lend an unbalanced approach to the schema and introduce possible bias towards related party transaction versus other types of transactions such as foreign exchange transactions, extraordinary transactions and non-financial events.