Federación Argentina de Consejos Profesionales de Ciencias Económicas

Ciudad de Buenos Aires, 13 de agosto de 2018

Sres.

International Auditing and Assurance Standards Board

529 5th Avenue - New York, New York 10017, EEUU

Re: Global Ethics Board Consults on Professional Skepticism, *Public Comment Sought on Behaviors Associated with Exercise of Professional Skepticism*

Senior Technical Director, Ken Siong

Nuestra FACPCE, a través del Consejo Elaborador de Normas de Contabilidad y Auditoría agradece la oportunidad de comentar el mencionado proyecto.

Comentarios

Las discusiones y debates con relación al proyecto en consulta fueron desarrollados dentro del Comité de Auditoría, en un grupo específico de trabajo creado con el fin de dar respuestas a proyectos que vuestro organismo pone en consulta.

El grupo de trabajo tuvo reuniones con el objeto de consensuar las respuestas y llegar a un documento definitivo.

Adjunto a la presente encontrarán las respuestas a las consultas del documento.

Cualquier inquietud o aclaración por favor dirigirla a facpce@facpce.org.ar

Le saluda atentamente

Dr. José Luis Arnoletto

Presidente

International Auditing and Assurance Standards Board
529 5th Avenue - New York, New York 10017, USA

Re: Global Ethics Board Consults on Professional Skepticism, Public Comment Sought on Behaviors Associated with Exercise of Professional Skepticism.

Senior Technical Director, Ken Siong

FACPCE, through the Accounting and Auditing Standards Development Board, welcomes the opportunity to comment on the aforementioned project.

Comments

The discussions and debates regarding the project were held in a specific Technical Working Group created in the Audit Committee, with the purpose of giving answers to this IAASB project.

The Technical Working Group had meetings in order to summarize their opinions before preparing a consensus response.
Attached please find our specific responses to the consultations document.

If you have any questions about our comments, please contact to facpce@facpce.org.ar
Yours sincerely

Dr. José Luis Arnoletto
President

Question 1 *Do you agree with the premise that a key factor affecting public trust in the profession is whether information with which a professional accountant is associated can be relied upon for its intended use?*

Yes. The intended users relies on accountant's report assuming that the accountant uses his/her skills and experience to provide some sort of assurance about the information associated with the accountant's report.

Sí. Los usuarios confían en el informe del contador asumiendo que el contador utiliza sus habilidades y experiencia para proporcionar algún tipo de aseguramiento sobre la información a que se refiere el informe del contador.

Question 2 *Do you agree with the behavior associated with public expectations of professional accountants? Are there aspects that should be included or excluded from the summary?*

Yes. We agree that professional behaviors are associated with what users expect from professional skepticism. Of course, such a definition may include other words such as objectivity and due care (terms used as some of the fundamental principles of the accounting practice framework). That is, impartial can be replaced by objective and diligent can be replaced by due care.

Sí. Estamos de acuerdo que los comportamientos profesionales se asocien con lo que los usuarios esperan de un escepticismo profesional. Por supuesto, dicha definición puede incluir otras palabras como objetividad y debido cuidado (términos utilizados como algunos de los principios fundamentales del marco de prácticas contables). Es decir, imparcial puede ser reemplazado por objetivo y diligente puede ser reemplazado por debido cuidado.

Question 3 *Do you agree that the mindset and behavior described in paragraph 10 should be expected of all professional accountants? If not, why not?*

We agree as long as we consider the nature and context of the work that is being carried out and the particular role or position of the professional

Estamos de acuerdo siempre que se considere la naturaleza y contexto del trabajo que se está llevando a cabo y el rol o posición particular del profesional.

Question4 Do *you believe the fundamental principles in the Code and related application material are sufficient to support the behaviors associated with the exercise of appropriate "professional-skepticism?"*

We believe that it would be convenient to develop in the Code contents that are specifically oriented to promote the effective exercise of appropriate "professional skepticism" on the part of all professional accountants.

Creemos que sería conveniente desarrollar en el Código contenidos que estén orientados específicamente para promover el ejercicio efectivo del "escepticismo profesional" apropiado por parte de todos los contadores-profesionales.

Question 5 Do*you believe professional skepticism, as defined in International Standards on Auditing, would be the appropriate term to use?*

We believe that the term "professional skepticism" may be appropriate if a definition is contemplated that is appropriate for all types of professional activity and that also reflects the care necessary to match the IAASB standards that consider this concept as a key attribute when a professional critically evaluates the evidence for the purpose of achieving a level of assuranceand issuing anassuranceconclusion

Nosotros creemos que el término "escepticismo profesional" puede ser el adecuado si se contempla una definición que sea comprensiva para todos los tipos de actividad profesional y que refleje tambien el cuidado necesario para coincidir con las normas del IAASB que consideran este concepto como un atributo clave cuando un profesional evalúa críticamente la evidencia con el propósito de alcanzar un nivel de seguridad y emitir una conclusión de seguridad

Question 6

(a) Do you believe that the Code should retain/use the term "professional skepticism" but develop a new definition?

Yes, we believe that a new comprehensive definition of the behaviors expected by accountants in assurance engagements should be developed, differentiating them from those that are not assurance.

Sí, creemos que se debería desarrollar una nueva definición comprensiva de los comportamientos esperados por los contadores en los compromisos de aseguramiento diferenciándolos de aquellos que no son aseguramiento.

(b) If so, do you support a new definition along the lines set out in paragraph 19?

Indeed, we believe that what is established in section 19 is an adequate basis.

Efectivamente, creemos que lo establecido en el apartado 19 es una base adecuada.

(c) If you do not support a definition along the lines described, could you please provide an alternative definition.

Not applicable

No aplicable

Question 7

(a) Would you support an alternative term to 'professional skepticism', such as 'critical thinking', 'critical analysis' or 'diligent mindset'?

We believe that such terms help define the content of professional skepticism but are not alternative

Creemos que tales términos ayudan a definir el contenido del escepticismo profesional pero no son alternativos

(b) If not, what other term(s), if any, would you suggest which focusses on the mindset and behaviors to be exercised by all professional accountants?

Not applicable

No aplicable.

Pregunta 8 Should the IESBA develop additional material, whether in the Code or otherwise, to highlight the importance of exercising the behavior and relevant professional skills as described? If yes, please suggest the type of application material than in your view would be the most meaningful to enhance the understanding of these behavioral characteristics and professional skills.

We consider that additional detailed information about the behavioral characteristics expected by all the professional accountants would be really necessary. The material could be a guide with examples of different situation which the professional must deal in searching the professional skepticism. The guide could be delivered in a friendly and didacticformat, , and distributed into the professional world and the stakeholders.

Consideramos que información adicional detallada sobre el comportamiento esperado de todos los contadores profesionales, sería realmente necesaria. El material podría ser una guía que contenga ejemplos de diferentes situaciones con las cuales se puede encontrar el profesional en la búsqueda del escepticismo profesional. Buscaría que esa guía se distribuyera en forma de material didáctico, que sea apreciado y difundido en el mundo profesional y en todos los grupos de interés.

Question 9 *What implications do you see on IAASB's International Standards as a result of the options in paragraphs 18 to 21?*

We believe that if a definition of the term "Professional Skepticism" is reached that is comprehensive and appropriate for all professional activities there would be no implications because the International Standards of the IAASB can reaffirm the key concepts and attributes that are necessary to achieve a level of assuranceand issue anassuranceconclusion.

Nosotros creemos que si se logra una definición del término “Escepticismo Profesional” que sea comprensivo y apropiado para todas las actividades del profesional no habría implicaciones porque las Normas Internacionales del IAASB por su lado pueden reafirmar los conceptos y atributos claves que son necesarios para alcanzar un nivel de seguridad y emitir una conclusión de seguridad.

Question 10*Should the Code include application or other material to increase awareness of biases, pressure and other impediments to approaching professional activities with an impartial and diligent mindset and exercising appropriate profesional skepticism in the circumstances? If yes,, please suggest the type of materials that in your view would be the most meaningful to help profesional accountants understand how bias, pressure and other impediments might influence their work.*

Yes, we believe it would be important to include some application or material to increase the accountants' awareness of any impediment they may have to approach their work with an impartial and diligent mentality and exercise the appropriate professional skepticism in each circumstance.

It could include a guide with different situations where problematic situations or cases of application of mental independence are dealt with. The objective of these problematic situations or cases is to avoid being affected by influences that compromise their professional judgment, or to act with integrity, objectivity and professional skepticism.

Sí, consideramos que sería importante incluir alguna aplicación o material para aumentar la conciencia de los contadores sobre cualquier impedimento que pueda tener para abordar su trabajo con mentalidad imparcial y diligente y ejercer el escepticismo profesional apropiado en cada circunstancia.

Se podría incluir una guía con distintas situaciones donde se traten situaciones problemáticas o casos de aplicación de la independencia mental. El objetivo de dichas situaciones problemáticas o casos, es evitar ser afectados por influencias que comprometan su juicio profesional, o su actuar con integridad, objetividad y escepticismo profesional.