

Response Template for the Invitation to Comment Before the IAASB Finalizes the Narrow Scope Amendments to the ISQMs and ISAs for the IAASB PIE Track 2 Project

Guide for Respondents

Comments are requested by **March 27, 2025**.

This template is for providing comments on the matters set out in the Invitation to Comment (ITC) for the pre-final narrow scope amendments to the International Standards on Quality Management (ISQMs) and the International Standards on Auditing (ISAs) as a Result of the Revisions to the Definitions of Listed Entity and Public Interest Entity (PIE) in the IESBA Code. It also allows for respondent details, demographics and other comments to be provided. Use of the template will facilitate the IAASB's automated collation of the responses.

You may respond to all questions or only selected questions.

To assist our consideration of your comments, please:

- For each question, start by indicating your overall response using the drop-down menu under each question. Then below that include any detailed comments, as indicated.
- When providing comments:
 - Respond directly to the questions.
 - Provide the rationale for your answers. If you disagree with the proposals as explained in the ITC, please provide specific reasons for your disagreement. If you agree with the proposals, it will be helpful for the IAASB to be made aware of this view.
 - Avoid inserting tables or text boxes in the template when providing your responses to the questions because this will complicate the automated collation of the responses.
- Submit your comments, using the response template only, without a covering letter or any summary of your key issues, instead identify any key issues, as far as possible, in your responses to the questions.

The response template provides the opportunity to provide details about your organization and, should you choose to do so, any other matters not raised in specific questions that you wish to place on the public record. All responses will be considered a matter of public record and will ultimately be posted on the IAASB website.

Use the "**Submit Comment**" button on the IAASB [web page](#) to upload the completed template.

Responses to IAASB’s ITC for the Pre-Final Narrow Scope Amendments to the ISQMs and ISAs as a Result of the Revisions to the Definitions of Listed Entity and PIE in the IESBA Code

PART A: Respondent Details and Demographic Information

Your organization’s name (or your name if you are making a submission in your personal capacity)	INSTITUTE OF CERTIFIED PUBLIC ACCOUNTANTS OF UGANDA (ICPAU)
Name(s) of person(s) responsible for this submission (or leave blank if the same as above)	CHARLES LUTIMBA
Name(s) of contact(s) for this submission (or leave blank if the same as above)	
E-mail address(es) of contact(s)	standards@icpau.co.ug ; clutimba@icpau.co.ug
Geographical profile that best represents your situation (i.e., from which geographical perspective are you providing feedback on the ITC). Select the most appropriate option.	Africa and Middle East
	If “Other”, please clarify
The stakeholder group to which you belong (i.e., from which perspective are you providing feedback on the ITC). Select the most appropriate option.	Regulator or audit/ assurance oversight authority
	If “Other”, please specify
Should you choose to do so, you may include information about your organization (or yourself, as applicable).	<p>The Institute of Certified Public Accountants of Uganda (ICPAU) is the national Professional Accountancy Organisation (PAO). ICPAU was established in 1992 by an Act of Parliament, now the Accountants Act Cap. 294. ICPAU is mandated to (i) To regulate and maintain the standard of accountancy in Uganda; and (ii) To prescribe and regulate the conduct of accountants and practising accountants in Uganda.</p> <p>ICPAU is a member of the International Federation of Accountants (IFAC) and the Pan African Federation of Accountants (PAFA)</p>

Should you choose to do so, you may provide overall views or additional background to your submission. **Please note that this is optional.** The IAASB’s preference is that you incorporate all your views in your comments to the questions.

Information, if any, not already included in responding to the questions in Part B:

PART B: Responses to Specific Questions in the ITC

For each question, please start with your overall response by selecting one of the items in the drop-down list under the question. Provide your detailed comments, if any, below as indicated.

1. You are invited to share any observations that you believe might be relevant to the IAASB prior to finalizing the narrow-scope amendments to the ISQMs and ISAs.

Please note:

- *This ITC does not extend to and is not inviting comment on the IESBA PIE revisions read together with the IESBA clarification. IESBA’s Listed Entity and PIE project is complete.*
- *If you submitted a comment letter to ED-PIE Track 2 in April 2024, the IAASB has fully considered those responses during its deliberations in September and December 2024; therefore, it is not necessary to repeat comments previously provided. You may believe that a specific matter remains relevant to share as an observation here, in which case the request is that you please clearly relate such matter to the IAASB’s decisions and rationale in this Post-Exposure Consultation. (See **Section IV**, paragraphs 23-32.)*

Overall response: [Concur and wish to share the following observations](#)

Detailed comments (if any):

We agree with the proposals, especially the adoption of the Publicly Traded Entity (PTE) approach. We agree that this approach aligns with the IESBA Public Interest Entity (PIE) principles, without directly adopting the IESBA PIE definition in the ISAs. We appreciate this as the definition of PIEs has been adopted and/or further refined to cater for clarity in the PIE definition on a local jurisdictional level for example by recognizing determination of PIE by setting size criteria among others.

Therefore, we agree that the principles-based PTE approach will allow the ISAs to cater to the jurisdictional differences in PIE categories which was allowed by the IESBA PIE revisions to the Code. It is uncontested that despite the zeal to ensure harmony in application of standards, jurisdictions still face great disparities that would call for further refining of the standards depending on the jurisdiction if meaningful application of the standards is to be attained.

Nevertheless, the IAASB should consider to continue monitoring the impact of the PTE and PIE definitions across jurisdictions to avoid any unintended disharmony in the application of the terminologies.

Specific questions on forward-looking matters (See **ITC Section V**):

- 2(a). Do you agree with the proposed effective date of the narrow scope amendments, i.e., for audits of financial statements for periods beginning on or after December 15, 2026, to be aligned with the standards from the Going Concern and Fraud projects? (See **Section V**, paragraphs 35-37.)

Overall response: [Neither agree/disagree, but see comments below](#)

Detailed comments (if any):

While ICPAU may agree with the proposed effective date of December 15 2026, because it will enable auditors to better implement the requirements in the Going Concern and Fraud projects especially those regarding more robust risk assessment procedures and exercise of enhanced professional scepticism, We believe that more time such as an extra year (effective date of December 15 2027) may be required probably with a provision for an allowance for early adoption for those jurisdictions that may be fully prepared.

2(b). Do you agree with the IAASB’s commitment to revisit the decision to adopt the definition of PIE in the IESBA Code (adapted as necessary for the ISQMs and ISAs) and extending differential requirements to apply to audits of PIEs? (See **Section IV**, paragraph 31, and **Section V**, paragraph 38.)

Please note: When the decision is revisited, the IAASB will develop an exposure draft for public consultation. Therefore, you do not now need to provide comments or to repeat comments previously provided regarding the extant differential requirements in the ISQMs and ISAs.

Overall response: [Agree, with comments below](#)

Detailed comments (if any):

ICPAU agrees with the decision to extend differential requirements to PIEs. The purpose of the differential requirements from our perspective is to acknowledge jurisdiction variations and enable jurisdictions to adopt relevant and applicable criteria to their respective settings (socio-economic conditions or otherwise) without necessarily digressing from the primary intention of the standard. The *Revisions to the Definitions of Listed Entity and Public Interest Entity in the Code Basis of Conclusion (BC71)* carries a very guiding notation which can be borrowed under the circumstances herein. That, “the IAASB Standards recognize through application material that certain entities other than listed entities could have characteristics that give rise to similar public interest issues as listed entities and, therefore, that it may be appropriate to apply a requirement that was designed for an audit of a listed entity to audits of a broader range of entities.” These similar public interest issues referred to here would vary from jurisdiction to jurisdiction and such issues may only be given attention where the differential requirements are extended to PIEs. And enlisting these differential requirements in an inclusive, is a demonstration of how diverse jurisdictions could be and therefore a need to cater for such diversity without losing attainment of a harmonised global position.

2(c). Do you agree with the proposed timing for revising the matters highlighted in 2(b) above? (See **Section V**, paragraphs 39-41.)

Overall response: [Agree \(with no further comments\)](#)

Detailed comments (if any):