

From: Kristin Kruse <krusek@verizon.net>
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To: Comments
Subject: [EXT]: About Docket 28

Having spent decades as an internal auditor in financial services, I am confounded as to why there is a need for this proposed standard. From my perspective, external audit reliance on internal audit for confirmations has worked well for both sides without concerns of mishandling by internal audit. I am not aware of any examples of why there is a need for external audit to no longer rely on internal audit for work when it is considered appropriate. Accounting Standard 2605 already provides external audit the opportunity to assess whether internal audit can be relied upon for work. It does not seem that an additional standard is needed, especially when it is one that mischaracterizes internal audit.

Thank you for the opportunity to comment.