

December 31, 2013

ISACA International Headquarters  
3701 Algonquin Road, Suite 1010  
Rolling Meadows, IL 60008, USA  
Attention: Director of Professional Standard Development

Response e-mailed to [standards@isaca.org](mailto:standards@isaca.org)

RE: ISACA IS Audit and Assurance Exposure Documents

Dear Sir/Madam:

On behalf of the over 180,000 global members of The Institute of Internal Auditors (The IIA), I would like to use the opportunity of ISACA's public exposure for comment of the *IS Audit and Assurance Guidelines Exposure* to share some general perspectives. While we acknowledge that ISACA has long promulgated standards and guidelines for the performance of IT auditing, we nonetheless continue to believe there are better ways to collectively serve the profession. Concerns have been raised by global internal audit practitioners as to the utility of duplicative, as well as inconsistent, authoritative internal audit guidance in the marketplace, with which we concur.

The IIA's International Professional Practices Framework, with The IIA's *Standards for the Professional Practice of Internal Auditing* serving as one of its mandatory elements, has been embraced globally by not only practitioners, but also by regulators, legislators and stock listing exchanges, as the only de facto set of globally recognized Standards and Guidance for the professional practices of internal auditing. To have other Standards and/or Guidance that is duplicative in many respects, and inconsistent in others, does not serve the internal audit profession well – not for practicing internal auditors, not for the audit committees Chief Audit Executives generally report to, and not for the regulators, legislators or listing exchanges that seek to have internal auditors abide by a single set of globally recognized Standards and Guidance.

To that end, we look to the Memorandum of Understanding between The IIA and ISACA effected in October, 2010, wherein it specifically states, that:

- “The purpose of (the) MOU is to create a formal basis for cooperation and collaboration between ISACA and The IIA for the advancement of the global internal auditing profession ..., and
- Where appropriate, coordinate and promote unified messages ... to standard-setters, regulators, and legislators globally and provide them with information regarding best professional practices.”

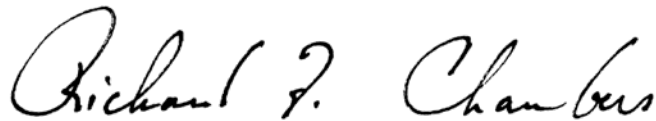
Undoubtedly, IT audit professionals require specific and specialized guidance in the execution of their duties, which are performed as part of a broader internal audit function. And, IT audit professionals look to ISACA for the expertise that can be brought to bear on many such aspects of said specialization. Yet, IT audit is a subset of internal audit just as much as other areas for subject matter and/or functional expertise.

Therefore, on behalf of the global internal audit profession we both strive to support in the best way possible, may I suggest we work together to reconcile and appropriately harmonize Standards and Guidance between the organizations. Among other means, I believe this can be done by us jointly taking proactive steps to eliminate unnecessary redundancy, identify and rectify areas of inconsistency, cite each other's standards and guidance where appropriate, enhance and promote each other's unique role in supporting the global internal audit profession, and identify and help close gaps in each organizations existing professional guidance for practitioners.

The IIA values our continued positive relationship with ISACA and looks forward to our ongoing work together in fostering effective governance, risk management and controls in organizations and governmental bodies throughout the world.

I welcome the opportunity to discuss this further, and can be reached at 407-937-1200. As well, should I not be immediately reachable, please also feel free to contact The IIA's Vice President for Professional Practices, Hal Garyn, at 407-937-1375.

Best regards,

A handwritten signature in black ink that reads "Richard F. Chambers". The signature is written in a cursive, flowing style.

Richard F. Chambers, CIA, CGAP, CCSA, CRMA  
President and Chief Executive Officer

cc: Ron Hale