
GRANT THORNTON LLP

Grant Thornton Tower
171 N. Clark Street, Suite 200
Chicago, IL 60601-3370

D +1 312 856 0200
S [linkd.in/grantthorntonus](https://www.linkedin.com/company/grantthorntonus)
twitter.com/grantthorntonus

September 10, 2024

Professional Ethics Executive Committee
Professional Ethics Division
American Institute of Certified Public Accountants
1211 Avenue of the Americas, 19th Floor
New York, NY 100036

Via Email to ethics-exposedraft@aicpa.org

**Re: Comments on Exposure Draft, Proposed revised interpretation
Executive or Employee Recruiting**

Dear Committee Members:

Grant Thornton LLP (“Grant Thornton”) appreciates the opportunity to comment on the American Institute of Certified Public Accountants (“AICPA”) Professional Ethics Executive Committee’s (“PEEC”) June 2024 Exposure Draft (“Exposure Draft”) proposing a revised interpretation of “Executive or Employee Recruiting” (ET sec. 1.295.135) of the “Independence Rule” (ET sec. 1.200.001). The proposal is part of the AICPA’s PEEC project to harmonize with ethics standards promulgated by the International Ethics Standards Board for Accountants (“IESBA”). PEEC is exposing for comment in the Exposure Draft revisions to the “Executive or Employee Recruiting” interpretation, which if adopted as final, the revised interpretation will be applicable to members in public practice.

Grant Thornton supports PEEC’s proposal for revised interpretation on “Executive or Employee Recruiting” to substantially converge with the related IESBA revisions. We agree the proposed revisions provide members with additional guidance to address potential familiarity and undue influence threats to independence when members perform executive or employee recruiting services to attest clients. The additional guidance will also assist in the consistent application of the revised interpretation across members in public practice.

Grant Thornton supports a revised “Executive or Employee Recruiting” interpretation, and we have provided the following comments for PEEC’s consideration.

Specific comments on Exposure Draft

Grant Thornton agrees with items a., b., c., e., and f. noted as specific request for comment in the Exposure Draft and does not have any other comments to share as a response to these questions.

In response to item d., we are not aware of any positions we would not advise on candidate competence based on guidance set forth from the attest client's criteria.

Additionally, we believe PEEC should consider providing nonauthoritative guidance in the format of a frequently asked questions (FAQs) document where additional considerations may be necessary when evaluating certain recruiting related activities. For example, a member may need to recuse themselves from interviewing certain candidates and advising on their competency if the member has a current or prior relationship with the candidate (e.g., the candidate is a close friend of the member or recently worked at the member's firm, etc.). The considerations that the member needs to evaluate could be covered in a FAQ. The member should consider the AICPA's Conceptual Framework in assessing whether to perform such activity and consider appropriate safeguards to eliminate or mitigate the threat to an acceptable level such as having another individual from the member's firm, with no relationship with the candidate, interview the candidate.

We would be pleased to discuss our comments with you. If you have any questions, please contact Anna Dourdourekas, National Partner in Charge, Ethical Standards, at Anna.Dourdourekas@us.gt.com or (630) 873-2633.

Sincerely,

/s/ Grant Thornton LLP