

AR Section 9080

Compilation of Financial Statements: Accounting and Review Services Interpretations of Section 80

1. Reporting When There Are Significant Departures From the Applicable Financial Reporting Framework

.01 Question—When the financial statements include significant departures from the applicable financial reporting framework, may the accountant modify his or her standard report in accordance with paragraphs .27–.29 of section 80, *Compilation of Financial Statements*, to include a statement that the financial statements are not in conformity with the applicable financial reporting framework?

.02 Interpretation—No. Including such a statement in the accountant's compilation report would be tantamount to expressing an adverse opinion on the financial statements as a whole. Such an opinion can be expressed only in the context of an audit engagement.

.03 However, paragraph .25 of section 80 states that an accountant may emphasize, in any report on financial statements, a matter disclosed in the financial statements. The accountant may wish, therefore, to emphasize the limitations of the financial statements in a separate paragraph of his or her compilation report, depending on his or her assessment of the possible dollar magnitude of the effects of the departures, the significance of the affected items to the entity, the pervasiveness and overall impact of the misstatements, and whether disclosure has been made of the effects of the departures. Such separate paragraph, which would follow the other modifications of his or her report (see illustrations in Compilation Exhibit B, "Illustrative Compilation Reports"), might read as follows (the illustration assumes that the accountant is reporting on financial statements in which there are significant departures from accounting principles generally accepted in the United States of America):

Because the significance and pervasiveness of the matters previously discussed makes it difficult to assess their impact on the financial statements as a whole, users of these financial statements should recognize that they might reach different conclusions about the company's financial position, results of operations, and cash flows if they had access to revised financial statements prepared in conformity with accounting principles generally accepted in the United States of America.

.04 Interpretation—Inclusion of such a separate paragraph in the accountant's compilation report is not a substitute for disclosure of the specific departures or the effects of such departures when they have been determined by management or are known as a result of the accountant's procedures.

[Issue Date: August 1981; Revised: November 2002; Revised: May 2004; Revised: July 2005; Revised: December 2010 to conform to SSARS No. 19 (formerly Interpretation No. 7 to section 100).]

2. Reporting on Tax Returns

.05 Question—May an accountant comply with a request from a nonissuer to issue a compilation report on financial information contained in a tax return, as in Form 1040, *U.S. Individual Income Tax Return*, or Form 1120, *U.S. Corporation Income Tax Return*, or in an information return, as in Form 990, *Return of Organization Exempt from Income Tax*; Form 1065, *U.S. Partnership Return of Income*; or Form 5500, *Return of Employee Benefit Plan*?

.06 Interpretation—Yes. Although paragraph .01 of section 80 states that the section establishes standards and provides guidance on compilations of financial statements and financial information included in a tax return is not included in the definition of financial statements, an accountant may decide to accept an engagement to issue a compilation report on such a return. In that case, the performance and reporting requirements of section 80 would apply.

[Issue Date: November 1982; Revised: February 2008; Revised: December 2010 to conform to SSARS No. 19 (formerly Interpretation No. 10 to section 100).]

3. Additional Procedures Performed in a Compilation Engagement

.07 Question—If an accountant performs procedures customarily performed in a review or audit but not in a compilation, is the accountant required to change the engagement to a review or an audit?

.08 Interpretation—No. Paragraph .13 of section 80 states that in a compilation engagement the accountant is not required to make inquiries or perform other procedures to verify, corroborate, or review information supplied by the entity. However, the accountant is not precluded from making inquiries or performing additional procedures.

.09 The wording of confirmation requests or other communications related to additional procedures performed in the course of a compilation engagement should not use phrases such as "as part of an *audit* of the financial statements" (emphasis supplied).

[Issue Date: March 1983; Revised: October 2000; Revised: November 2002; Revised: May 2004; Revised: December 2010 to conform to SSARS No. 19 (formerly Interpretation No. 13 to section 100).]

4. Differentiating a Financial Statement Presentation From a Trial Balance

.10 Question—Paragraph .01 of section 80 states that the accountant is required to comply with the provisions of section 80 whenever he or she is engaged to report on compiled financial statements or submits financial statements to a client or third parties. What attributes should an accountant consider when differentiating a financial statement from a trial balance to determine if he or she is required to comply with the provisions of section 80?

.11 Interpretation—The accountant may consider, among other matters, the following attributes when determining whether a financial presentation is a financial statement or a trial balance:

- Generally, a financial statement features the combination of similar general ledger accounts to create classifications or account groupings with corresponding subtotals and totals of dollar amounts. Some examples of these classifications or account groupings are current assets, long-term debt, and revenues. In addition, contra accounts are generally netted against the related primary accounts in financial statement presentations (that is, "Accounts

Receivable Net of Allowance for Bad Debts"). In contrast, a trial balance consists of a listing of all of the general ledger accounts and their corresponding debit or credit balances.

- Financial statements generally contain titles that identify the presentation as one intended to present financial position, results of operations, or cash flows. Typical titles for financial statements include the following:
 - Balance Sheet
 - Statement of Income or Statement of Operations
 - Statement of Comprehensive Income
 - Statement of Retained Earnings
 - Statement of Cash Flows
 - Statement of Changes in Owners' Equity
 - Statement of Assets and Liabilities (with or without owners' equity accounts)
 - Statement of Revenue and Expenses
 - Statement of Financial Position
 - Statement of Activities
 - Summary of Operations
 - Statement of Operations by Product Lines
 - Statement of Cash Receipts and Disbursements

Examples of typical titles for trial balance presentations are as follows:

- Trial Balance
- Working Trial Balance
- Adjusted Trial Balance
- Listing of General Ledger Accounts
- The balance sheet in a set of financial statements segregates asset, liability, and owners' equity accounts and presents these three elements based on the following basic example equation:

$$\text{Assets} = \text{Liabilities} + \text{Owners' Equity}$$

The elements of the income statement and their relationship to net income are presented based on the following basic example equation:

$$\text{Revenues} - \text{Expenses} + \text{Gains} - \text{Losses} = \text{Net Income}$$

In a trial balance, no attempt is made to establish a mathematical relationship among the elements except that total debits equal total credits.

- The income statement in a set of financial statements generally contains a caption such as "Net Income" or "Net Revenues Over Expenses" that identifies the net results of operations. Trial balance presentations generally do not contain similar captions.

- The balance sheet in a set of financial statements usually presents assets in the order of their liquidity and liabilities in the order of their maturity. In a trial balance, the accounts are generally listed in account number order as they appear in the general ledger.
- In a set of financial statements, the income statement articulates with the balance sheet because the net results of operations are added to or subtracted from opening retained earnings. In a trial balance, the net results of operations are generally not closed out to retained earnings.

.12 The accountant's use of judgment is important when considering these attributes to determine whether the financial presentation constitutes a financial statement or a trial balance. When making this determination, the accountant may consider the preponderance of the attributes of the financial presentation. For example, a trial balance that contains one or two attributes of a financial statement may, in the accountant's judgment, still constitute a trial balance. When the presentation is deemed to be a financial statement, the accountant, at a minimum, should compile the financial statements in accordance with section 80 when he or she submits such financial statements to his or her client or third parties.

[Issue Date: September 1990; Revised: October 2000; Revised: February 2008; Revised: December 2010 to conform to SSARS No. 19 (formerly Interpretation No. 15 to section 100).]

5. Submitting Draft Financial Statements

.13 Question—Accountants frequently submit draft financial statements (a) because information needed to complete a compilation of the financial statements will not be available until a later date, or (b) to provide the client with the opportunity to read and analyze the financial statements prior to their final issuance. Is it permissible for the accountant to submit draft financial statements without intending to comply with the reporting provisions of section 80?

.14 Interpretation—Except in those instances in which the financial statements are not expected to be used by a third party, as permitted under paragraphs .22–.24 of section 80, an accountant is precluded from submitting draft financial statements unless he or she intends to submit those financial statements in final form accompanied by an appropriate compilation report prescribed by section 80. However, as long as the accountant intends to issue a compilation report on the financial statements in final form and labels each page of draft financial statements with words such as "Draft," "Preliminary Draft," "Draft—Subject to Changes," or "Working Draft," the accountant is not required to comply with the reporting provisions of section 80 with respect to those draft financial statements. In the rare circumstance in which the accountant intended to but never submitted final financial statements, the accountant may want to document the reasons why he or she was unable to submit financial statements in final form accompanied by an appropriate compilation report.

[Issue Date: September 1990; Revised: October 2000; Revised: December 2010 to conform to SSARS No. 19 (formerly Interpretation No. 17 to section 100).]

6. Reporting When Financial Statements Contain a Departure From Promulgated Accounting Principles That Prevents the Financial Statements From Being Misleading

.15 Question—The "Accounting Principles Rule" (ET sec. 1.320.001) of the AICPA Code of Professional Conduct states

A member shall not (1) express an opinion or state affirmatively that the financial statements or other financial data of any entity are presented in conformity with generally accepted accounting principles or (2) state that he or she is not aware of any material modifications that should be made to such statements or data in order for them to be in conformity with generally accepted accounting principles, if such statements or data contain any departure from an accounting principle promulgated by bodies designated by Council to establish such principles that has a material effect on the statements or data taken as a whole. If, however, the statements or data contain such a departure and the member can demonstrate that due to unusual circumstances the financial statements or data would otherwise have been misleading, the member can comply with the rule by describing the departure, its approximate effects, if practicable, and the reasons why compliance with the principle would result in a misleading statement.

Paragraphs .27–.29 of section 80 do not address the "Accounting Principles Rule" circumstances. When the circumstances contemplated by the "Accounting Principles Rule" are present, how should the accountant report on the information described in the "Accounting Principles Rule?"

.16 Interpretation—The "Accounting Principles Rule" does not apply to engagements to report on a compiled financial statements. Accordingly, when the accountant is reporting on a compiled financial statements and is confronted with the circumstances contemplated by the "Accounting Principles Rule," the guidance in paragraphs .27–.29 of section 80 pertaining to departures from generally accepted accounting principles (GAAP) should be followed.

[Issue Date: February 1991; Revised: October 2000; Revised: November 2002;

Revised: May 2004; Revised: July 2005;

Revised: December 2010 to conform to SSARS No. 19 (formerly Interpretation No. 19 to section 100); Revised: January 2015.]

7. Applicability of Statements on Standards for Accounting and Review Services to Litigation Services

.17 Question—When are litigation services excluded from the applicability of Statements on Standards for Accounting and Review Services (SSARSs)?

.18 Interpretation—SSARSs do not apply to financial statements submitted in conjunction with litigation services that involve pending or potential formal legal or regulatory proceedings before a "trier of fact" in connection with the resolution of a dispute between two or more parties when the

- a. service consists of being an expert witness.
- b. service consists of being a "trier of fact" or acting on behalf of one.
- c. accountant's work under the rules of the proceedings is subject to detailed analysis and challenge by each party to the dispute.
- d. accountant is engaged by an attorney to do work that will be protected by the attorney's work product privilege, and such work is not intended to be used for other purposes.

When performing such litigation services, the accountant should comply with the "General Standards Rule" (ET sec. 1.300.001).

.19 Question—When do SSARSs apply to litigation service engagements?

.20 Interpretation—SSARSs apply to litigation service engagements when the accountant

- a. submits unaudited financial statements of a nonissuer that are the representation of management (owners) to others who,

under the rules of the proceedings, do not have the opportunity to analyze and challenge the accountant's work, or

- b. is specifically engaged to submit, in accordance with SSARSs, financial statements that are the representation of management (owners).

[Issue Date: May 1991; Revised: October 2000; Revised: February 2008; Revised: December 2010 to conform to SSARS No. 19 (formerly Interpretation No. 20 to section 100); Revised: January 2015.]

8. Applicability of Statements on Standards for Accounting and Review Services When Performing Controllorship or Other Management Services

.21 Question—If the accountant is in public practice and provides an entity with controllorship or other management services that entail the submission of financial statements, is the accountant required to follow the requirements of section 80?

.22 Interpretation—If the accountant is in public practice as defined in ET section 0.400 of the AICPA Code of Professional Conduct and is not a stockholder, partner, director, officer, or employee of the entity, the accountant is required to follow the performance and communication requirements of section 80, including any requirement to disclose a lack of independence.

.23 If the accountant is in public practice and is also a stockholder, partner, director, officer, or employee of the entity, the accountant may either (a) comply with the requirements of section 80, or (b) communicate, preferably in writing, the accountant's relationship to the entity (for example, stockholder, partner, director, officer, or employee). The following is an example of the type of communication that may be used by the accountant:

The accompanying balance sheet of Company X as of December 31, 20XX, and the related statements of income and cash flows for the year then ended have been prepared by [name of accountant], CPA. I have prepared such financial statements in my capacity [describe capacity, for example, as a director] of Company X.

.24 If an accountant is not in public practice, the issuance of a report under SSARSs would be inappropriate; however, the previously mentioned communication may be used.

[Issue Date: July 2002; Revised: December 2010 to conform to SSARS No. 19 (formerly Interpretation No. 21 to section 100); Revised: January 2015.]

9. Use of the Label "Selected Information—Substantially All Disclosures Required by [the applicable financial reporting framework] Are Not Included" in Compiled Financial Statements

.25 Question—Can an accountant label notes to the financial statements "Selected Information—Substantially All Disclosures Required by [identify the applicable financial reporting framework (for example, accounting principles generally accepted in the United States of America)] Are Not Included" when the client includes more than a few required disclosures?

.26 Interpretation—No. As discussed in paragraph .20 of section 80, when the entity wishes to include disclosures about only a few matters in the form of notes to the financial statements, such disclosures should be labeled "Selected Information—Substantially All Disclosures Required by [identify the applicable financial reporting framework (for example "accounting principles generally accepted in the United States of America")] Are Not Included."

.27 When the financial statements include more than a few disclosures, this guidance is not appropriate. The omission of one or more notes, when substantially all other disclosures are presented, should be treated in a compilation report like any other departure from the applicable financial reporting framework, and the nature of the departure and its effects, if known, should be disclosed in accordance with paragraphs .27–.29 of section 80. The label "Selected Information—Substantially All Disclosures Required by [*identify the applicable financial reporting framework (for example "accounting principles generally accepted in the United States of America")*] Are Not Included" is not intended to be used for the omission of (intentionally or unintentionally) one or more specific disclosures. In determining whether use of the label is appropriate, the accountant needs to apply professional judgment to all the facts and circumstances.

[Issue Date: December 2002; Revised: December 2010 to conform to SSARS No. 19 (formerly Interpretation No. 22 to section 100).]

10. Omission of the Display of Comprehensive Income in Compiled Financial Statements

.28 Question—When an element of comprehensive income is present, can the display of comprehensive income be omitted when issuing a compilation report on financial statements that omit substantially all disclosures required by accounting principles generally accepted in the United States of America?

.29 Interpretation—Yes. Financial Accounting Standards Board (FASB) *Accounting Standards Codification (ASC) 220, Comprehensive Income*, requires the display of comprehensive income when a full set of financial statements is presented in conformity with accounting principles generally accepted in the United States of America. However, the display of comprehensive income may be omitted by identifying the omission in the compilation report or, if the engagement is to compile financial statements that are not expected to be used by a third party and the accountant does not report on those financial statements, in the engagement letter. The following is suggested modified wording (shown in *italic*) to the paragraph in the compilation report:

Management has elected to omit substantially all the disclosures, (the statement of cash flows, if applicable,) *and the display of comprehensive income* required by accounting principles generally accepted in the United States of America. If the omitted disclosures, (the statement of cash flows, if applicable,) *and the display of comprehensive income* were included in the financial statements, they might influence the user's conclusions about the company's financial position, results of operations, and cash flows. Accordingly, these financial statements are not designed for those who are not informed about such matters.

.30 If the accountant compiles financial statements that include substantially all disclosures required by accounting principles generally accepted in the United States of America but omit the display of comprehensive income, the omission is a departure from accounting principles generally accepted in the United States of America.

.31 Additionally, if an element of comprehensive income has not been computed, for example, unrealized gains and losses arising from investments in marketable securities classified as "available for sale," then the accountant should consider a departure from accounting principles generally accepted in the United States of America and follow the guidance in paragraphs .27–.29 of section 80.

[Issue Date: September 2003; Revised: May 2004; Revised: July 2005; Revised: June 2009; Revised: December 2010 to conform to SSARS No. 19 (formerly Interpretation No. 25 to section 100).]

11. Special-Purpose Financial Statements to Comply With Contractual Agreements or Regulatory Provisions

.32 Question—An accountant may be asked to compile special-purpose financial statements prepared to comply with a contractual agreement or regulatory provision that specifies a special basis of presentation. In most circumstances, these financial statements are intended solely for the use of the parties to the agreement, regulatory bodies, or other specified parties. How should the accountant modify the standard compilation report when reporting on these compiled special-purpose financial statements?

.33 Interpretation—An accountant who is asked to compile special-purpose financial statements prepared to comply with a contractual agreement or a regulatory provision that specifies a special basis of presentation may issue a compilation report on those financial statements in accordance with section 80 as described in this interpretation. This interpretation describes reporting on

- a. special-purpose financial statements prepared in compliance with a contractual agreement or regulatory provision that does not constitute a complete presentation of the entity's assets, liabilities, revenues, and expenses, but is otherwise prepared in conformity with GAAP or an other comprehensive basis of accounting (OCBOA), or
- b. a special-purpose financial presentation (may be a complete set of financial statements or a single financial statement) prepared on a basis of accounting prescribed in an agreement that does not result in a presentation in conformity with GAAP or an OCBOA.

Financial Statements Prepared on a Basis of Accounting Prescribed in a Contractual Agreement or Regulatory Provision That Results in an Incomplete Presentation but One That Is Otherwise in Conformity With GAAP or an OCBOA

.34 An entity may engage an accountant to compile a special-purpose financial statement prepared in compliance with a contractual agreement or regulatory provision that does not constitute a complete presentation of the entity's assets, liabilities, revenues, or expenses, but is otherwise prepared in conformity with GAAP or an OCBOA. For example, a governmental agency may require a statement of gross income and certain expenses of an entity's real estate operation in which income and expenses are measured in conformity with GAAP, but expenses are defined to exclude certain items such as interest, depreciation, and income taxes. Such a statement may also present the excess of gross income over defined expenses. Also, a buy-sell agreement may specify a statement of gross assets and liabilities of the entity measured in conformity with GAAP, but limited to the assets to be sold and liabilities to be transferred pursuant to the agreement.

.35 When the accountant submits compiled special-purpose financial statements prepared on a basis of accounting prescribed in a contractual agreement or regulatory provision that results in an incomplete presentation but one that is otherwise prepared in conformity with GAAP or an OCBOA, the

accountant's report should be modified to include a separate paragraph with the following information:

- An explanation of what the financial statement is intended to present and a reference to the note to the special-purpose financial statement that describes the basis of presentation
- If the basis of presentation is in conformity with GAAP or an OCBOA, a statement that the presentation is not intended to be a complete presentation of the entity's assets, liabilities, revenues, and expenses
- A separate paragraph at the end of the report stating that the report is intended solely for the information and use of those within the entity, the parties to the contract or agreement, the regulatory agency with which the report is being filed, or those with whom the entity is negotiating directly, and is not intended to be and should not be used by anyone other than these specified parties

.36 The following is an illustrative example of a compilation report on special-purpose financial statements:

I (we) have compiled the accompanying statement of net assets sold of XYZ Company as of December 31, 20X1. I (we) have not audited or reviewed the accompanying statement of net assets sold and, accordingly, do not express an opinion or provide any assurance about whether the statement of net assets sold is in accordance with the purchase agreement described in Note A.

Management (owners) is (are) responsible for the preparation and fair presentation of the statement of net assets sold in accordance with the purchase agreement described in Note A and for designing, implementing, and maintaining internal control relevant to the preparation and fair presentation of the statement of net assets sold.

My (our) responsibility is to conduct the compilation in accordance with Statements on Standards for Accounting and Review Services issued by the American Institute of Certified Public Accountants. The objective of a compilation is to assist management in presenting financial information in the form of financial statements without undertaking to obtain or provide any assurance that there are no material modifications that should be made to the financial statements.

The accompanying statement was prepared for the purpose of presenting the net assets of XYZ Company sold to ABC Company pursuant to the purchase agreement described in Note A, and is not intended to be a complete presentation of XYZ Company's assets and liabilities.

This report is intended solely for the information and use of [*the specified parties*] and is not intended to be and should not be used by anyone other than these specified parties.

Financial Statements Prepared on a Basis of Accounting Prescribed in an Agreement That Results in a Presentation That Is Not in Conformity With GAAP or an OCBOA

.37 An entity may engage an accountant to compile a special-purpose financial statement prepared in conformity with a basis of accounting that departs from GAAP or an OCBOA. A loan agreement, for example, may require the borrower to prepare consolidated financial statements in which assets, such as inventory, are presented on a basis that is not in conformity with GAAP or an OCBOA. Also, an acquisition agreement may require the financial statements of the entity being acquired (or a segment of it) to be prepared in conformity with

GAAP except for certain assets, such as receivables, inventories, and properties for which a valuation basis is specified in the agreement.

.38 Financial statements prepared under a basis of accounting as discussed in the preceding are not considered to be prepared in conformity with an OCBOA because the criteria used to prepare such financial statements do not meet the requirement of "having substantial support," even though the criteria are definite.

.39 When the accountant submits compiled special-purpose financial statements prepared on a basis of accounting prescribed in an agreement that results in a presentation that is not in conformity with GAAP or an OCBOA, the accountant's report should be modified to include a separate paragraph with the following information:

- An explanation of what the presentation is intended to present and a reference to the note to the special-purpose financial statements that describes the basis of presentation.
- A statement that the financial statement is not intended to be a presentation in conformity with GAAP or an OCBOA.
- A description and the source of significant interpretations, if any, made by the company's management relating to the provisions of a relevant agreement.
- A separate paragraph at the end of the report stating that the report is intended solely for the information and use of those within the entity, the parties to the contract or agreement, the regulatory agency with which the report is being filed, or those with whom the entity is negotiating directly, and is not intended to be and should not be used by anyone other than these specified parties. For example, if the financial statements have been prepared for the specified purpose of obtaining bank financing, the report's use should be restricted to the various banks with whom the entity is negotiating the proposed financing.

.40 The following is an illustrative example of a compilation report on special-purpose financial statements:

I (we) have compiled the special-purpose statement of assets and liabilities of XYZ Company as of December 31, 20X1, and the related special-purpose statements of revenue and expenses and of cash flows for the year then ended. I (we) have not audited or reviewed the accompanying financial statements and, accordingly, do not express an opinion or provide any assurance about whether the financial statements are in accordance with the acquisition agreement between ABC Company and XYZ Company as discussed in Note A.

Management (owners) is (are) responsible for the preparation and fair presentation of the financial statements in accordance with the acquisition agreement between ABC Company and XYZ Company as described in Note A and for designing, implementing, and maintaining internal control relevant to the preparation and fair presentation of the financial statements.

My (our) responsibility is to conduct the compilation in accordance with Statements on Standards for Accounting and Review Services issued by the American Institute of Certified Public Accountants. The objective of a compilation is to assist management in presenting financial information in the form of financial statements without undertaking to obtain or provide any assurance that there are no material modifications that should be made to the financial statements.

The accompanying special-purpose financial statements were prepared for the purpose of complying with the acquisition agreement between ABC Company and XYZ Company as discussed in Note A, and are not intended to be a presentation in conformity with GAAP.

This report is intended solely for the information and use of [the specified parties] and is not intended to be and should not be used by anyone other than these specified parties.

[Issue Date: December 2006; Revised: December 2010 to conform to SSARS No. 19 (formerly Interpretation No. 28 to section 100).]

12. Reporting on an Uncertainty, Including an Uncertainty About an Entity's Ability to Continue as a Going Concern

.41 Question—How should an accountant modify the standard compilation report when, during the performance of compilation procedures, evidence or information comes to the accountant's attention that there may be an uncertainty about the entity's ability to continue as a going concern for a reasonable period of time, not to exceed one year beyond the date of the financial statements being compiled?

.42 Interpretation—Disclosure requirements with respect to uncertainties are included in FASB ASC 275, *Risks and Uncertainties*; FASB ASC 450, *Contingencies*; and other authoritative accounting literature. However, the accounting literature does not provide specific guidance on disclosure of uncertainties caused by concern about an entity's ability to continue as a going concern. Continuation of an entity as a going concern is assumed in financial reporting in the absence of significant information to the contrary. The accountant should follow the guidance in paragraphs .40–.43 of section 80 with respect to his or her consideration of the entity's ability to continue as a going concern during the performance of compilation procedures.

.43 If the accountant concludes that management's disclosure of the uncertainty regarding the entity's ability to continue as a going concern is adequate but further decides to include an emphasis-of-matter paragraph with respect to the uncertainty in the accountant's compilation report, he or she may use the following language:

As discussed in Note X, certain conditions indicate that the Company may be unable to continue as a going concern. The accompanying financial statements do not include any adjustments that might be necessary should the Company be unable to continue as a going concern.

.44 Question—If the accountant, while performing a compilation, becomes aware of a material uncertainty other than a going concern uncertainty (for example, an uncertainty regarding pending or threatened litigation), what should the accountant consider in deciding whether a report modification is necessary?

.45 Interpretation—Disclosure requirements with respect to uncertainties are included in FASB ASC 275, 450, and other authoritative accounting literature. If the accountant determines that the disclosure of the uncertainty is not in accordance with the applicable financial reporting framework, he or she should follow the guidance in paragraphs .27–.29 of section 80.

.46 If the accountant concludes that management's disclosure of the uncertainty is in accordance with the applicable financial reporting framework but further decides to include an emphasis-of-matter paragraph with respect to the uncertainty in the accountant's compilation report, he or she may use the following language (the following is assuming that the financial statements

were prepared in accordance with accounting principles generally accepted in the United States of America):

As discussed in Note X, the Company is currently named in a legal action. The Company has determined that it is not possible to predict the eventual outcome of the legal action but has determined that the resolution of the action will not result in an adverse judgment that would materially affect the financial statements. Accordingly, the accompanying financial statements do not include any adjustments related to the legal action under FASB ASC 450.

.47 Question—Paragraph .20 of section 80 allows the accountant, when he or she is requested to do so, to compile financial statements that omit substantially all of the disclosures required by an applicable financial reporting framework, provided the omission of substantially all disclosures was not, to the accountant's knowledge, undertaken with the intention of misleading those who might reasonably be expected to use such financial statements, and the accountant includes a paragraph in the accountant's compilation report regarding the omission of substantially all disclosures. Should disclosure of an uncertainty be considered so significant that it also could never be omitted?

.48 Interpretation—No. The user is adequately warned of the limitations of the financial statements by the report language required by paragraph .20 of section 80.

[Issue date: February 2007; Revised: February 2008; Amended: December 2008; Revised: June 2009; Revised: December 2010 to conform to SSARS No. 19 (formerly Interpretation No. 29 to section 100)]

13. Compilations of Financial Statements Prepared in Accordance With International Financial Reporting Standards

.49 Question—The International Accounting Standards Board (IASB) has been designated by the Council of the AICPA as the body to establish international financial reporting standards for both private and public entities pursuant to the "Compliance With Standards Rule" (ET sec. 1.310.001) and the "Accounting Principles Rule" (ET sec. 1.320.001) of the AICPA Code of Professional Conduct as of May 18, 2008. As a result, how would an accountant apply the reporting guidance in section 80 when engaged to compile financial statements presented in accordance with International Financial Reporting Standards (IFRSs) as issued by the IASB?

.50 Interpretation—A report illustration of how an accountant would apply the reporting guidance in section 80 when reporting on financial statements presented in accordance with IFRSs is as follows:

Accountant's Compilation Report

[Appropriate Salutation]

I (we) have compiled the accompanying statements of financial position of XYZ Company as of December 31, 20X2 and 20X1, and the related statements of comprehensive income, changes in equity, and cash flows for the years then ended. I (we) have not audited or reviewed the accompanying financial statements and, accordingly, do not express an opinion or provide any assurance about whether the financial statements are in accordance with International Financial Reporting Standards as issued by the International Accounting Standards Board.

Management (owners) is (are) responsible for the preparation and fair presentation of the financial statements in accordance with International Financial Reporting Standards as issued by the International Accounting Standards

Board and for designing, implementing, and maintaining internal control relevant to the preparation and fair presentation of the financial statements.

My (our) responsibility is to conduct the compilation in accordance with Statements on Standards for Accounting and Review Services issued by the American Institute of Certified Public Accountants. The objective of a compilation is to assist management in presenting financial information in the form of financial statements without undertaking to obtain or provide any assurance that there are no material modifications that should be made to the financial statements.

[Signature of accounting firm or accountant, as appropriate]

[Date]

When the accountant compiles financial statements that omit substantially all disclosures but are otherwise in conformity with IFRSs as issued by the IASB, the accountant may wish to modify the third paragraph of the standard report as follows:

Management has elected to omit substantially all disclosures (and the statement of cash flows) required by International Financial Reporting Standards as issued by the International Accounting Standards Board. If the omitted disclosures and statement were included in the financial statements, they might influence the user's conclusions about the company's financial position, results of operations, and cash flows. Accordingly, these financial statements are not designed for those who are not informed about such matters.

.51 Question—Unlike accounting principles generally accepted in the United States of America as issued by FASB, IFRSs require an entity to disclose comparative information in respect of the previous comparative period for all amounts presented in the current year's financial statements. When the accountant compiles financial statements that omit prior year information, should such omission be disclosed in the accountant's compilation report as a departure from IFRSs as issued by the IASB in accordance with paragraphs .27–.29 of section 80?

.52 Interpretation—Yes. Because IFRSs require an entity to disclose comparative information in respect of the previous comparative period for all amounts presented in the current year's financial statements, the failure to include such information in financial statements would be a departure from GAAP. An example of a paragraph that may be added to the accountant's compilation report is as follows:

Comparative information with respect to the year ended December 31, 20XX-1 has not been presented. International Financial Reporting Standards [or *IFRSs for SMEs*] as issued by the International Accounting Standards Board require an entity to disclose comparative information in respect of the previous comparative period for all amounts presented in the current year's financial statements.

When the accountant compiles financial statements that omit substantially all disclosures and comparative information in respect of the previous comparative period but are otherwise in conformity with IFRSs as issued by the IASB, the accountant may wish to modify the third paragraph of the standard report as follows:

Management has elected to omit substantially all disclosures (and the statement of cash flows) and comparative financial information as of and for the year ended December 31, 20XX-1 required by International Financial Reporting Standards [or *IFRSs for SMEs*] as issued by the International Accounting Standards Board. If the omitted disclosures, statement, and comparative

financial information were included in the financial statements, they might influence the user's conclusions about the company's financial position, results of operations, and cash flows. Accordingly, these financial statements are not designed for those who are not informed about such matters.

[Issue Date: May 2008; Revised: June 2010; Revised: August 2010; Revised: December 2010 (formerly Interpretation No. 30 to section 100); Revised: January 2015.]

14. Compilations of Financial Statements Prepared in Accordance With a Financial Reporting Framework Generally Accepted in Another Country

.53 Question—An accountant may be engaged to compile financial statements that have been prepared in conformity with a financial reporting framework generally accepted in another country (including financial statements prepared in accordance with a jurisdictional variation of IFRSs such that the entity's financial statements do not contain an explicit and unreserved statement of compliance with IFRSs as issued by the IASB). How should an accountant apply the reporting requirements of section 80 when reporting on those financial statements?

.54 Interpretation—If the financial statements are intended for use only outside of the United States of America, the accountant may report using the standard form of U.S. compilation report modified as appropriate to identify the applicable financial reporting framework, or alternatively, the accountant may report using the standard compilation report form and content of the other country. (See Interpretation No. 15 with respect to Considerations Related to Compilations Performed in Accordance with International Standard on Related Services [ISRS] 4410 (Revised), *Compilation Engagements*).

.55 The standard compilation report used in another country, even when it appears similar to that used in the United States of America, may convey a different meaning and entail a different responsibility on the part of the accountant due to custom or culture. Issuing a standard compilation report of another country may require an understanding of local laws. When issuing the accountant's standard compilation report of another country, the accountant is required to obtain an understanding of applicable legal responsibilities, in addition to the compilation standards and accounting principles generally accepted in the other country, as indicated in paragraph .11 of section 80. Therefore, depending on the nature and extent of the accountant's knowledge and experience, the accountant may wish to consult with persons having expertise in the reporting practices of the other country and associated legal responsibilities to obtain the understanding needed to issue that country's standard compilation report.

.56 If the accountant's report is intended for use in the United States of America, the reporting requirements described in paragraphs .16–.19 of section 80 would apply. Additionally, paragraph .31 of section 80 states that a need for restriction on the use of the report may result from a number of circumstances, including, but not limited to, the purpose of the report and the potential for the report to be misunderstood when taken out of context in which it was intended to be used. Because of the nature of the basis of presentation of the financial statements there is a presumption that the report would be misunderstood or taken out of context in which it was intended to be used. In such instances, the accountant may use the following form of report:

Accountant's Compilation Report

[Appropriate Salutation]

I (we) have compiled the accompanying balance sheets of XYZ Company as of December 31, 20X2 and 20X1, and the related statements of income, retained earnings, and cash flows for the years then ended. I (we) have not audited or reviewed the accompanying financial statements and, accordingly, do not express an opinion or provide any assurance about whether the financial statements are in accordance with [*the financial reporting framework generally accepted in another country, including identification of the nationality of the framework*].

Management (owners) is (are) responsible for the preparation and fair presentation of the financial statements in accordance with [*the financial reporting framework generally accepted in another country, including identification of the nationality of the framework*] and for designing, implementing, and maintaining internal control relevant to the preparation and fair presentation of the financial statements.

My (our) responsibility is to conduct the compilation in accordance with Statements on Standards for Accounting and Review Services issued by the American Institute of Certified Public Accountants. The objective of a compilation is to assist management in presenting financial information in the form of financial statements without undertaking to obtain or provide any assurance that there are no material modifications that should be made to the financial statements.

This report is intended solely for the information and the use of [*specified parties*] and is not intended to be and should not be used by anyone other than the specified parties.

[Signature of accounting firm or accountant, as appropriate]

[Date]

.57 When the financial statements will be used both outside of the United States of America as well as in the United States of America, nothing precludes the accountant from issuing two reports—a report to be used only outside of the United States of America and another report to be used in the United States of America.

[Issue Date: May 2008; Revised: June 2010; Revised: August 2010; Revised: December 2010 (formerly Interpretation No. 30 to section 100); Revised: December 2012; Revised, February 2015.]

15. Considerations Related to Compilations Performed in Accordance With International Standard on Related Services 4410 (Revised), *Compilation Engagements*, Issued by the International Auditing and Assurance Standards Board

.58 *Question*—May a U.S. accountant perform a compilation of historical financial statements of a U.S. entity¹ in accordance with ISRS 4410 (Revised) issued by the International Auditing and Assurance Standards Board (IAASB)? The financial statements may have been prepared in accordance with IFRSs or accounting principles generally accepted in the United States of America.

.59 *Interpretation*—Yes. An accountant performing a compilation of historical financial statements of a U.S. entity is required to follow the compilation standards as promulgated by the AICPA's Accounting and Review Services

¹ A U.S. entity is an entity that is either organized or domiciled in the United States of America.

Committee. However, those standards do not prohibit an accountant from indicating that the compilation also was conducted in accordance with another set of compilation standards. In an engagement to compile the historical financial statements in accordance with ISRS 4410 (Revised), the accountant may perform the compilation in accordance with SSARs as well as ISRS 4410 (Revised). Such a compilation report may read as follows:

I (we) have compiled the accompanying balance sheets of XYZ Company as of December 31, 20X2 and 20X1, and the related statements of income, retained earnings, and cash flows for the years then ended. I (we) have not audited or reviewed the accompanying financial statements and, accordingly, do not express an opinion or provide any assurance about whether the financial statements are in accordance with International Financial Reporting Standards as issued by the International Accounting Standards Board.

Management (owners) is (are) responsible for the preparation and fair presentation of the financial statements in accordance with International Financial Reporting Standards as issued by the International Accounting Standards Board and for designing, implementing, and maintaining internal control relevant to the preparation and fair presentation of the financial statements.

My (our) responsibility is to conduct the compilation in accordance with Statements on Standards for Accounting and Review Services issued by the American Institute of Certified Public Accountants and in accordance with the International Standard on Related Services (ISRS 4410 [Revised]) issued by the International Auditing and Assurance Standards Board applicable to compilation engagements. The objective of a compilation is to assist management in presenting financial information in the form of financial statements without undertaking to obtain or provide any assurance that there are no material modifications that should be made to the financial statements.

.60 If the report is for use only outside of the United States of America, the accountant is still required to apply SSARs, except for requirements related to report form and content.

[Issue Date: May 2008; Revised: June 2010; Revised: August 2010; Revised: December 2010 (formerly Interpretation No. 30 to section 100); Revised: December 2012; Revised, January 2015.]

16. Preparation of Financial Statements for Use by an Entity's Auditors

.61 Question—Paragraph .22 of section 80 states "When the accountant submits compiled financial statements to his or her client that are not expected to be used by a third party, he or she is not required to issue a compilation report." In the situation in which a client engages an accountant, other than its auditor, to prepare unaudited financial statements on behalf of management and those financial statements are provided by management to its outside auditor for the purposes of the annual audit, is the client's outside auditor deemed to be a third party using the financial statements?

.62 Interpretation—No. Although the client's outside auditor is a third party, the auditor is not deemed to be using the financial statements. The auditor's role is to apply auditing procedures to those statements in order to obtain sufficient appropriate audit evidence to support his or her opinion on those statements. Accordingly, the requirements in paragraphs .22–.24 of section 80 are applicable.

[Issue Date: December 2008; Revised: December 2010 to conform to SSARS No. 19 (formerly Interpretation No. 31 to section 100).]

17. Required Supplementary Information That Accompanies Compiled Financial Statements

.63 Question—Paragraph .53 of section 80 addresses situations when the basic financial statements are accompanied by information presented for supplementary analysis purposes. Certain information presented for supplementary analysis purposes is required by a body designated by the AICPA Council to establish GAAP pursuant to the "Compliance With Standards Rule" and the "Accounting Principles Rule"² (hereinafter referred to as "required supplementary information"). Examples of required supplementary information that may accompany compiled financial statements include the following:

- With respect to common interest realty associations, estimates of current or future costs of major repairs and replacements of common property that will be required in the future as required by FASB ASC 972-235-50-3
- Management's discussion and analysis and budgetary comparison statements as required by Governmental Accounting Standards Board Statement No. 34, *Basic Financial Statements—and Management's Discussion and Analysis—for State and Local Governments*.

Is the accountant required to apply procedures to required supplementary information that accompanies compiled financial statements?

.64 Interpretation—No. SSARSs do not require the accountant to apply procedures to any information presented for supplementary analysis purposes, including required supplementary information. However, nothing precludes the accountant from compiling the required supplementary information if engaged to do so.

.65 Question—Paragraph .53 of section 80 states that when the basic financial statements are accompanied by information presented for supplementary analysis purposes, the accountant should indicate the degree of responsibility, if any, he or she is taking with respect to such information. How may an accountant modify the accountant's compilation report to refer to the required supplementary information and explain the circumstances regarding its presentation?

.66 Interpretation—The accountant may modify the accountant's compilation report by including a separate paragraph that refers to the required supplementary information and explains the circumstances regarding its presentation. That separate paragraph would be presented after the paragraph describing the accountant's responsibility and may read as follows:

The Required Supplementary Information Is Included and the Accountant Did Not Compile the Required Supplementary Information

[Identify the applicable financial reporting framework (for example, accounting principles generally accepted in the United States of America)] require that

² The bodies designated by the AICPA Council to establish professional standards with respect to financial accounting and reporting principles pursuant to these rules are the Financial Accounting Standards Board, the Governmental Accounting Standards Board, the Federal Accounting Standards Advisory Board, and the International Accounting Standards Board.

[*identify the required supplementary information*] on page XX be presented to supplement the basic financial statements. Such information, although not a part of the basic financial statements, is required by [*identify the designated accounting standard setter*] who considers it to be an essential part of financial reporting and for placing the basic financial statements in an appropriate operational, economic, or historical context. Such information was not audited, reviewed, or compiled by me (us) and, accordingly, I (we) do not express an opinion or provide any assurance on it.

The Required Supplementary Information Is Included, the Accountant Compiled the Required Supplemental Information and No Material Departures From the Prescribed Guidelines Regarding the Required Supplementary Information Have Been Identified

[*Identify the applicable financial reporting framework (for example, accounting principles generally accepted in the United States of America)*] require that [*identify the required supplementary information*] on page XX be presented to supplement the basic financial statements. Such information, although not a part of the basic financial statements, is required by [*identify the designated accounting standard setter*] who considers it to be an essential part of financial reporting and for placing the basic financial statements in an appropriate operational, economic, or historical context. Such information has been compiled by me (us) without audit or review and, accordingly, I (we) do not express an opinion or provide any assurance on it.

All Required Supplementary Information Omitted

Management has omitted [*describe the missing required supplementary information*] that [*identify the applicable financial reporting framework (for example, accounting principles generally accepted in the United States of America)*] require to be presented to supplement the basic financial statements. Such missing information, although not a part of the basic financial statements, is required by [*identify the designated accounting standard setter*] who considers it to be an essential part of financial reporting and for placing the basic financial statements in an appropriate operational, economic, or historical context.

Some Required Supplementary Information is Omitted and Some Is Presented in Accordance With the Prescribed Guidelines Regarding the Required Supplementary Information

[*Identify the applicable financial reporting framework (for example, accounting principles generally accepted in the United States of America)*] require that [*identify the included supplementary information*] be presented to supplement the basic financial statements. Such information, although not a part of the basic financial statements, is required by [*identify designated accounting standard setter*] who considers it to be an essential part of financial reporting for placing the basic financial statements in an appropriate operational, economic, or historical context. Such information was not audited, reviewed, or compiled by me (us) and, accordingly, I (we) do not express an opinion or provide any assurance on it.

Management has omitted [*describe the missing required supplementary information*] that [*identify the applicable financial reporting framework*] require to be presented to supplement the basic financial statements. Such missing information, although not a part of the basic financial statements, is required by [*identify designated accounting standard setter*] who considers it to be an essential part of financial reporting for placing the basic financial statements in an appropriate operational, economic, or historical context.

Material Departures From the Prescribed Guidelines Regarding the Required Supplementary Information Were Identified While Compiling the Required Supplementary Information

[Identify the applicable financial reporting framework (for example, accounting principles generally accepted in the United States of America)] require that the [identify the supplementary information] on page XX be presented to supplement the basic financial statements. Such information, although not a part of the basic financial statements, is required by [identify designated accounting standard setter] who considers it to be an essential part of financial reporting for placing the basic financial statements in an appropriate operational, economic, or historical context. Such information was compiled by me (us) without audit or review and, accordingly, I (we) do not express an opinion or provide any assurance on it. However, during my (our) compilation, I (we) did become aware of the following material departures from the prescribed guidelines regarding the required supplementary information [identify the required supplementary information and describe the material departures from the prescribed guidelines regarding the required supplementary information].

.67 Question—When required supplementary information is omitted from financial statements that omit substantially all the disclosures required by accounting principles generally accepted in the United States of America (U.S. GAAP), may the accountant combine the paragraph discussing the omission of substantially all the disclosures, as required by paragraph .20 of section 80, with the paragraph referring to the omission of the required supplementary information?

.68 Interpretation—No. Because required supplementary information is not a part of the basic financial statements and the omitted disclosures (and the statement of cash flows, if applicable) are required by U.S. GAAP to be included in the basic financial statements, the report elements required by paragraphs .20 and .53 of section 80 are not compatible.

[Issue Date: October 2011; Revised: January 2015.]
