



Chapter 9, “Direct Examination Engagements”

Agenda Item 3B

Requirements	Application and Other Explanatory Material
<p>Introduction</p> <p>9.1 This chapter of Statements on Standards for Attestation Engagements (attestation standards) contains performance and reporting requirements and application guidance for all direct examination engagements. The requirements and guidance in this chapter supplement the requirements and guidance in chapter 1, “Concepts Common to All Attestation Engagements.”</p> <p>9.2 A direct examination engagement is an attestation engagement in which the practitioner measures or evaluates the subject matter against the applicable criteria. In a direct examination engagement, the practitioner’s conclusion(s) addresses the reported outcome of the measurement or evaluation of the underlying subject matter against the criteria. (Ref: par. 9.A1)</p> <p>9.3 Direct examination engagements have many features in common with other examination engagements undertaken pursuant to chapter 2, “Examination Engagements.” Fundamental concepts related to matters such as level of assurance, risk assessment, and materiality are the same. However, direct examination engagements also have features that are clearly distinct from those attestation engagements. For example, in a direct examination engagement,</p> <ul style="list-style-type: none"> the party responsible for the underlying subject matter being reported on is not required to make an assertion regarding whether the entity’s subject matter is in accordance with suitable criteria. 	<p>9.A1 The underlying subject matter of a direct examination engagement may be similar to or the same as that of an assertion based examination engagement. However, in an assertion based examination engagement, the responsible party first evaluates the subject matter against the criteria and provides the practitioner with a written assertion, while this is not the case in a direct examination engagement. The following are examples of engagements covered by assertion-based chapters of the attestation standards that may be conducted under this chapter:</p> <ul style="list-style-type: none"> Sustainability – An engagement to obtain reasonable assurance on the sustainability performance of the entity. Compliance with law or regulation – An engagement to obtain reasonable assurance on whether the entity has complied with relevant laws or regulations. (Ref: par. 9.2)

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<ul style="list-style-type: none"> • The practitioner’s report often provides more information relative to the procedures performed and specific findings in addition to the practitioner’s conclusion(s). • The practitioner, along with the engaging party, normally decide on the applicable criteria to be used for the engagement, deriving such criteria from relevant sources (for example, pertinent laws or regulators, policies, directives, and guidelines) and seeking agreement from the engaging party that the criteria are suitable and appropriate for the engagement purpose.¹ <p>Effective Date 9.4 This chapter is effective for direct examination reports dated on or after May 1, 2017.</p> <p>Objectives 9.5 In conducting a direct examination engagement, the objectives of the practitioner are to</p> <ul style="list-style-type: none"> a. obtain reasonable assurance about whether the subject matter as measured or evaluated against the criteria is free from material misstatement²; b. provide a written report that expresses a conclusion(s) about whether the subject matter is in accordance with [or based on] the criteria, in all material respects, and c. communicate further as required by this chapter. 	
<p>Definitions 9.6 For purposes of this chapter, the following terms have the meanings attributed as follows:</p>	

¹ Paragraph 1.25b(ii) of chapter 1, Concepts Common to All Attestation Engagements.”

² Paragraph 1.11g of chapter 1 defines a misstatement and explains that “a misstatement may be referred to as a deviation, exception or instance of noncompliance.”

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<p><i>a.</i> Appropriateness of evidence. The measure of the quality of evidence, that is, its relevancy and reliability in providing support for the practitioner's conclusion(s).</p> <p><i>b.</i> Modified conclusion. A qualified, adverse, or disclaimer of a conclusion(s).</p> <p><i>c.</i> Risk of material misstatement. The risk that the subject matter is not in accordance with [or based on] the criteria in all material respects.</p> <p><i>d.</i> Sufficiency of evidence. The measure of the quantity of evidence. The quantity of the evidence needed is affected by the risks of material misstatement and also by the quality of such evidence.</p> <p><i>e.</i> Test of controls. A procedure designed to evaluate the operating effectiveness of controls in preventing, or detecting and correcting, material misstatements (or deviations) in the subject matter.</p>	
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<p>Conduct of a Direct Examination Engagement 9.7 In performing a direct examination engagement, the practitioner should comply with this chapter and chapter 1. (Ref: par. 9.A2)</p>	<p>Conduct of a Direct Examination Engagement 9.A2 If a practitioner performs a direct examination engagement on subject matter that is covered by a subject-matter chapter (chapters 5-7), the practitioner may find the guidance in the subject-matter chapter helpful in performing the direct examination engagement. (Ref: par. 9.7)</p>
<p>Preconditions for an Direct Examination Engagement 9.8 Chapter 1 indicates that a practitioner must be independent when performing an attestation engagement in accordance with the attestation standards unless the practitioner is required by law or regulation to accept the engagement and report on the subject matter.³ When the practitioner is not independent but is required by law or regulation to accept the engagement and report on the subject matter, the practitioner should disclaim a conclusion(s) and should specifically state that the practitioner is not independent. The practitioner is neither required to provide, nor precluded from providing, the reasons for the lack of independence; however, if</p>	

³ Paragraph 1.24 of chapter 1, "Concepts Common to All Attestation Engagements."

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<p>the practitioner chooses to provide the reasons for the lack of independence, the practitioner should include all the reasons therefor.</p> <p>9.9 Because the practitioner’s role in an attestation engagement is that of an attester, the practitioner should not take on the role of the party responsible for the subject matter in an attestation engagement. If the practitioner takes on the role of the party responsible for the subject matter, the practitioner’s independence would be impaired. (Ref: par.9.A3)</p>	<p>9.A3 The responsible party can acknowledge its responsibility for the subject matter in a number of ways, for example, in an engagement letter or a representation letter. Other evidence of the responsible party’s responsibility for the subject matter include, for example, legislation, a regulation, or a contract. (Re: par. 9.9)</p>
<p>Agreeing on the Terms of the Engagement</p> <p>9.10 The practitioner should agree upon the terms of the engagement with the engaging party. The agreed-upon terms of the engagement should be specified in sufficient detail in an engagement letter or other suitable form of written agreement. (Ref: par. 9.A4)</p>	<p>Agreeing on the Terms of the Engagement</p> <p>9.A4 It is in the interests of both the engaging party and the practitioner to document the agreed-upon terms of the engagement before the commencement of the engagement to help avoid misunderstandings. The form and content of the engagement letter or other suitable form of written agreement will vary with the engagement circumstances. (Ref: par. 9.10)</p>
<p>9.11 The agreed-upon terms of the engagement should include the following:</p> <ul style="list-style-type: none"> a. The objective and scope of the engagement b. The responsibilities of the practitioner (Ref: par. 9.A5) c. A statement that the engagement will be conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants d. The responsibilities of the responsible party and the responsibilities of the engaging party, if different <ul style="list-style-type: none"> e. A statement about the inherent limitations of a direct examination engagement (Ref: par. 9.A6) f. Identification of the criteria for the measurement, evaluation, or disclosure of the subject matter g. An acknowledgement that the engaging party agrees to provide the practitioner with a representation letter at the conclusion of the engagement 	<p>9.A5 A practitioner may further describe the responsibilities of the practitioner by adding the following items to the engagement letter or other suitable form of written agreement:</p> <ul style="list-style-type: none"> a. A statement that a direct examination is designed to obtain reasonable assurance about whether the subject matter is in accordance with [or based on] the criteria, in all material respects b. A statement that the objective of a direct examination is to provide the engaging party with a written report summarizing the work performed and the findings and conclusion(s) about whether the subject matter is in accordance with [or based on] the criteria, in all material respects <p>(Ref: par. 9.11b)</p> <p>9.A6 If relevant, a statement about the inherent limitations of a direct examination engagement may indicate that “because of the inherent limitations of a direct examination engagement together with the inherent limitations of internal control, an unavoidable risk exists that some material misstatements (or deviations) may not be detected, even though the direct examination is properly planned and performed in accordance with the attestation standards.” (Ref: par. 9.11e)</p>

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<p>9.12 When a governmental agency or body engages the practitioner to perform a direct examination engagement, the practitioner may not be able to get the governmental agency or body to agree to sign a written representation at the conclusion of the engagement. In that situation, the practitioner should inform the engaging party that a scope limitation may result if the practitioner is not able to obtain sufficient, appropriate attestation evidence.</p> <p>9.13 Although an engagement may recur, each engagement is considered a separate engagement. The practitioner should assess whether circumstances require revision to the terms of a preceding engagement. If the practitioner concludes that the terms of the preceding engagement need not be revised for the current engagement, the practitioner should remind the engaging party of the terms of the current engagement, and the reminder should be documented.</p>	
<p>Planning and Performing the Engagement</p> <p>9.14 The practitioner should establish an overall engagement strategy that sets the scope, timing, and direction of the engagement and guides the development of the engagement plan. (Ref: par. 9.A7–9.A10)</p>	<p>Planning and Performing the Engagement</p> <p>9.A7 Planning involves the engagement partner and other key members of the engagement team and may involve the practitioner’s specialists in developing</p> <ul style="list-style-type: none"> • an overall strategy for the scope, timing, and conduct of the engagement and • an engagement plan, consisting of a detailed approach for the nature, timing, and extent of procedures to be performed. <p>Adequate planning helps the practitioner to devote appropriate attention to important areas of the engagement, identify potential problems on a timely basis, and properly organize and manage the engagement in order for it to be performed in an effective and efficient manner. Adequate planning also assists the practitioner in properly assigning work to engagement team members, and facilitates the direction, supervision, and review of their work. Further, it assists, when applicable, the coordination of work performed by other practitioners and practitioner’s specialists. The nature and extent of planning activities will vary with the engagement circumstances, for example, the complexity of the assessment or evaluation of the subject matter and the practitioner’s previous experience with it. Examples of relevant matters that may be considered include the following:</p> <ul style="list-style-type: none"> • The characteristics of the engagement that define its scope, including the terms of the engagement, the characteristics of the underlying subject matter, and the criteria • The expected timing and the nature of the communications required • The results of preliminary engagement activities, such as client

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	<p>acceptance, and, when applicable, whether knowledge gained on other engagements performed by the engagement partner for the appropriate party(ies) is relevant</p> <ul style="list-style-type: none"> • The engagement process, including possible sources of evidence, and choices among alternative measurement or evaluation methods • The practitioner’s understanding of the appropriate party(ies) and its (their) environment, including the risks that the subject matter may be materially misstated • Identification of intended users and their information needs and consideration of materiality and the components of attestation risk • The risk of fraud relevant to the engagement • The effect on the engagement of using the internal audit function <p>(Ref: par. 9.14)</p> <p>9.A8 The practitioner may decide to discuss elements of planning with the appropriate party(ies) to facilitate the conduct and management of the engagement (for example, to coordinate some of the planned procedures with the work of the responsible party’s personnel). Although these discussions often occur, the overall engagement strategy and the engagement plan remain the practitioner’s responsibility. When discussing matters included in the overall engagement strategy or engagement plan, care is needed in order not to compromise the effectiveness of the engagement. For example, discussing the nature and timing of detailed procedures with the responsible party may compromise the effectiveness of the engagement by making the procedures too predictable. (Ref: par. 9.14)</p> <p>9.A9 Planning is not a discrete phase, but rather a cumulative and iterative process throughout the engagement. As a result of unexpected events, changes in conditions, or evidence obtained, the practitioner may need to revise the overall strategy and engagement plan and, thereby, the resulting nature, timing, and extent of planned procedures. (Ref: par. 9.14)</p> <p>9.A10 In smaller or less complex engagements, the entire engagement may be conducted by a very small engagement team, possibly involving the engagement partner (who may be a sole practitioner) working without any other engagement team members. With a smaller team, coordination of, and communication among, team members is easier. Establishing the overall engagement strategy in such cases need not be a complex or time-consuming</p>

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<p>9.15 In establishing the overall engagement strategy, the practitioner should</p> <ol style="list-style-type: none"> a. identify the characteristics of the engagement that define its scope and ascertain the reporting objectives of the engagement in order to plan the timing of the engagement and the nature of the communications required; b. consider the factors that, in the practitioner’s professional judgment, are significant in directing the engagement team’s efforts; c. consider the results of preliminary engagement activities, such as client acceptance, and, when applicable, whether knowledge gained on other engagements performed by the engagement partner for the entity is relevant; and d. ascertain the nature, timing, and extent of resources necessary to perform the engagement. 	<p>exercise; it varies according to the size of the entity, complexity of the engagement, and size of the engagement team. (Ref: par. 9.14)</p>
<p>9.16 The practitioner should develop a plan that includes a description of the following items:</p> <ol style="list-style-type: none"> a. The nature, timing, and extent of planned risk assessment procedures b. The nature, timing, and extent of planned further procedures c. Other planned procedures that are required to be carried out so that the engagement complies with the attestation standards 	
<p>Risk Assessment Procedures</p> <p>9.17 The practitioner should obtain an understanding of the subject matter and other engagement circumstances sufficient to</p> <ol style="list-style-type: none"> a. enable the practitioner to identify and assess the risks of material misstatement in the subject matter and b. provide a basis for designing and performing procedures to respond to the assessed risks and to obtain reasonable assurance to support the practitioner’s conclusion(s). <p>(Ref: par. 9.A11–9.A15)</p>	<p>Risk Assessment Procedures</p> <p>9.A11 Obtaining an understanding of the subject matter and other engagement circumstances provides the practitioner with a frame of reference for exercising professional judgment throughout the engagement, for example, when</p> <ul style="list-style-type: none"> • considering the characteristics of the subject matter; • assessing the suitability of criteria; • considering the factors that, in the practitioner’s professional judgment, are significant in directing the engagement team’s efforts, including situations in which special consideration may be necessary (for example, when there is a need for specialized skills or the work of a specialist); • establishing and evaluating the continued appropriateness of quantitative materiality levels (when appropriate) and considering qualitative materiality factors; • developing expectations when performing analytical procedures; • designing and performing procedures;

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<p>9.18 In obtaining an understanding of the subject matter in accordance with paragraph 9.17, the practitioner should obtain an understanding of internal control over the preparation of the subject matter relevant to the engagement. This includes evaluating the design of those controls relevant to the subject matter and determining whether they have been implemented by performing procedures in</p>	<ul style="list-style-type: none"> • evaluating evidence, including the reasonableness of the written representations received by the practitioner. <p>(Ref: par. 9.17)</p> <p>9.A12 In assessing inherent risk, the practitioner may consider factors relevant to direct examination engagements, such as the following:</p> <ul style="list-style-type: none"> • The complexity of the subject matter • The length of time during which the entity has had experience with the subject matter • Prior experience with the entity's assessment of the subject matter <p>(Ref: par. 9.17)</p> <p>9.A13 Discussions between the engagement partner and other key members of the engagement team, and any key practitioner's external specialists, about the susceptibility of the subject matter to material misstatements (or deviations), and the application of the applicable criteria to the facts and circumstances of the engagement, may assist the engagement team in planning and performing the engagement. It is also useful to communicate relevant matters to members of the engagement team, and to any practitioner's external specialists not involved in the discussion. (Ref: par. 9.17)</p> <p>9.A14 The practitioner ordinarily has a lesser depth of understanding of the subject matter and other engagement circumstances than the responsible party. (Ref: par. 9.17)</p> <p>9.A15 The results of the entity's risk assessment process may also assist the practitioner in obtaining an understanding of the subject matter and other engagement circumstances. (Ref: par. 9.17)</p> <p>9.A16 Understanding internal control relevant to the subject matter assists the practitioner in identifying the types of misstatements (or deviations) and factors that affect the risks of material misstatement. The practitioner is</p>

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<p>addition to inquiry of the personnel responsible for the subject matter. (Ref: par. 9.A16)</p>	<p>required to evaluate the design of relevant controls and determines whether they have been implemented, by performing procedures in addition to inquiry of the responsible party. Professional judgment is needed to determine which controls are relevant in the engagement circumstances. (Ref: par. 9.18)</p>
<p>Materiality in Planning and Performing the Engagement 9.19 When establishing the overall engagement strategy, the practitioner should consider materiality for the subject matter. (Ref: par. 9.A17–9.A23)</p>	<p>Materiality in Planning and Performing the Engagement 9.A17 Materiality is considered in the context of qualitative factors and, when applicable, quantitative factors. The relative importance of qualitative factors and quantitative factors when considering materiality in a particular engagement is a matter for the practitioner’s professional judgment. (Ref: par. 9.19)</p> <p>9.A18 Professional judgments about materiality are made in light of surrounding circumstances, but they are not affected by the level of assurance; ; materiality is based on the information needs of intended users and not the level of assurance. (Ref: par. 9.19)</p> <p>9.A19 In general, misstatements (or deviations), including omissions, are considered to be material if, individually or in the aggregate, they could reasonably be expected to influence relevant decisions of intended users that are made based on the subject matter . The practitioner’s consideration of materiality is a matter of professional judgment and is affected by the practitioner’s perception of the common information needs of intended users as a group. In this context, it is reasonable for the practitioner to assume that intended users</p> <ul style="list-style-type: none"> a. have a reasonable knowledge of the subject matter and a willingness to study the subject matter with reasonable diligence. b. understand that the subject matter is measured or evaluated and examined to appropriate levels of materiality and have an understanding of any materiality concepts included in the criteria. c. understand any inherent uncertainties involved in measuring or evaluating the subject matter. d. make reasonable decisions on the basis of the subject matter taken as a whole. <p>Unless the engagement has been designed to meet the particular information needs of specific users, the possible effect of misstatements (or deviations) on</p>

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	<p>specific users, whose information needs may vary widely, is not ordinarily considered.</p> <p>(Ref: par. 9.19)</p> <p>9.A20 Qualitative factors may include the following:</p> <ul style="list-style-type: none"> • The interaction between, and relative importance of, various aspects of the subject matter , such as numerous performance indicators • The wording chosen with respect to subject matter that is expressed in narrative form (for example, the wording chosen does not omit or distort the information) • The characteristics of the presentation adopted for the subject matter when the criteria allow for variations in that presentation • The nature of a misstatement, for example, the nature of observed deviations in the operation of a control when the responsible party asserts that the control is effective • Whether a misstatement affects compliance with laws or regulations • In the case of periodic reporting on a subject matter , the effect of an adjustment that affects past or current information about the subject matter or is likely to affect future information about the subject matter • Whether a misstatement is the result of an intentional act or is unintentional • Whether a misstatement is significant with regard to the practitioner’s understanding of known previous communications to users, for example, in relation to the expected outcome of the measurement or evaluation of the subject matter • Whether a misstatement relates to the relationship between the responsible party, and if different, the engaging party or its relationship with other parties <p>(Ref: par. 9.19)</p> <p>9.A21 Quantitative factors relate to the magnitude of misstatements (or deviations) relative to reported amounts for those aspects of the subject matter , if any, that are</p>

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	<ul style="list-style-type: none"> • expressed numerically; or • otherwise related to numerical values (for example, the number of observed deviations in the operation of a control when the direct examination involves the effectiveness of the control). <p>(Ref: par. 9.19)</p> <p>9.A22 When quantitative factors are applicable, planning the engagement solely to detect individually material misstatements (or deviations) overlooks the fact that the aggregate of individually immaterial misstatements (or deviations) may cause the subject matter to be materially misstated. Applying materiality to elements of the subject matter ordinarily is not a simple mechanical calculation but involves the exercise of professional judgment. It is affected by the practitioner’s understanding of the subject matter and the responsible party, updated during the performance of the risk assessment procedures, and consideration of the nature and extent of misstatements (or deviations) identified in previous attestation engagements. (Ref: par. 9.19)</p> <p>9.A23 The criteria may discuss the concept of materiality in the context of the preparation and presentation of the subject matter and thereby provide a frame of reference for the practitioner in considering materiality for the engagement. Although criteria may discuss materiality in different terms, the concept of materiality generally includes the matters discussed in paragraphs 9.A17–9.A22. If the criteria do not include a discussion of the concept of materiality, these paragraphs provide the practitioner with a frame of reference. (Ref: par. 9.19)</p>
<p>9.20 The practitioner should reconsider materiality for the subject matter if the practitioner becomes aware of information during the engagement that would have caused the practitioner to have initially determined a different materiality.</p>	
<p>Identifying Risks of Material Misstatement</p> <p>9.21 The practitioner should identify and assess risks of material misstatement as the basis for designing and performing further procedures whose nature, timing, and extent</p> <ol style="list-style-type: none"> a. are responsive to assessed risks of material misstatement and b. allow the practitioner to obtain reasonable assurance about whether the subject matter is, in all material respects, in accordance with [or based 	<p>Identifying Risks of Material Misstatement</p> <p>9.A24 Most of the practitioner’s work in forming a conclusion(s) consists of obtaining and evaluating evidence. Procedures to obtain evidence can include inspection, observation, confirmation, recalculation, reperformance, and analytical procedures, often in some combination, in addition to inquiry. (Ref: par. 9.21)</p>

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<p>on] the criteria.</p> <p>(Ref: par. 9.A24–9.A25)</p>	<p>9.A25 In some cases, a subject-matter specific chapter may include requirements that affect the nature, timing, and extent of procedures. For example, a subject-matter specific chapter may describe the nature or extent of particular procedures to be performed in a particular type of engagement. Even in such cases, determining the exact nature, timing, and extent of procedures is a matter of professional judgment and will vary from one engagement to the next. (Ref: par. 9.21)</p>
<p>Responding to Assessed Risks and Obtaining Evidence</p> <p>9.22 To obtain reasonable assurance the practitioner should obtain sufficient appropriate evidence to reduce attestation risk to an acceptably low level and thereby enable the practitioner to draw reasonable conclusions on which to base the practitioner’s opinion or conclusion(s). (Ref: par. 9.A26–9.A27)</p>	<p>9.A26 Overall responses to address the assessed risks of material misstatement of the subject matter may include</p> <ul style="list-style-type: none"> • emphasizing to the engagement team the need to maintain professional skepticism; • assigning more experienced staff or those with specialized skills or using specialists; • providing more supervision; • incorporating additional elements of unpredictability in the selection of further procedures to be performed; and • making changes to the nature, timing, or extent of procedures (for example, performing procedures at period end instead of at an interim date or modifying the nature of procedures to obtain more persuasive evidence). <p>(Ref: par. 9.22)</p> <p>9.A27 The assessment of the risks of material misstatement of the subject matter is affected by the practitioner’s understanding of the control environment. An effective control environment may allow the practitioner to have more confidence in internal control and the reliability of evidence generated internally within the entity and, thus, for example, may allow the practitioner to conduct some procedures at an interim date rather than at the period end. Deficiencies in the control environment, however, have the opposite effect, for example, the practitioner may respond to an ineffective control environment by</p> <ul style="list-style-type: none"> • conducting more procedures as of the period end rather than at an interim date, • obtaining more extensive evidence from procedures other than tests of controls, and • increasing the number of locations to be included in the examination

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	scope. (Ref: par. 9.22)
<p>Further Procedures 9.23 The practitioner should design and perform further procedures whose nature, timing, and extent are based on, and responsive to, the assessed risks of material misstatement. (Ref: par. 9.A28)</p>	<p>9.A28 The practitioner chooses a combination of procedures to obtain reasonable assurance. The procedures listed below may be used, for example, for planning or performing the engagement, depending on the context in which they are applied by the practitioner:</p> <ul style="list-style-type: none"> • Inspection; • Observation; • Confirmation; • Recalculation; • Reperformance; • Analytical procedures; and • Inquiry. <p>(Ref: par. 9.23)</p>
<p>9.24 In designing and performing the further procedures in accordance with paragraph 9.23, the practitioner should</p> <ol style="list-style-type: none"> a. consider the reasons for the assessment given to the risk of material misstatement, including <ol style="list-style-type: none"> i. the likelihood of material misstatement due to the particular characteristics of the subject matter and ii. whether the practitioner intends to rely on the operating effectiveness of controls in determining the nature, timing, and extent of other procedures; and b. obtain more persuasive evidence the higher the practitioner’s assessment of risk. <p>(Ref: par. 9.A29–9.A30)</p>	<p>9.A29 In addition to the level of assurance to be obtained, factors that may affect the practitioner’s selection of procedures include the nature of the subject matter; , and the information needs of the intended users and the engaging party. (Ref: par.9.24)</p> <p>9.A30 In some cases, a subject-matter-specific chapter may include requirements that affect the nature, timing and extent of procedures. For example, a subject-matter-specific chapter may describe the nature or extent of particular procedures to be performed. Even in such cases, determining the exact nature, timing and extent of procedures is a matter of professional judgment and will vary from one engagement to the next. (Ref: par. (Ref: par.9.24)</p>
<p>9.25 The practitioner’s assessment of the risks of material misstatement may change during the course of the engagement as additional evidence is obtained. In circumstances where the practitioner obtains evidence that is inconsistent with the evidence on which the practitioner originally based the assessment of the risks of material misstatement, the practitioner should revise the assessment and modify the planned procedures accordingly. (Ref: par. 9.A31)</p>	<p>9.A31 A direct examination engagement is an iterative process, and information may come to the practitioner’s attention that differs significantly from that on which the determination of planned procedures was based. As the practitioner performs planned procedures, the evidence obtained may cause the practitioner to perform additional procedures. (Ref: par. 9.25)</p>

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<p>9.26 When designing and performing procedures, the practitioner should consider the relevance and reliability of the information to be used as evidence. If</p> <ul style="list-style-type: none"> a. evidence obtained from one source is inconsistent with that obtained from another, b. the practitioner has doubts about the reliability of information to be used as evidence, or c. responses to inquiries of the responsible party or others are inconsistent or otherwise unsatisfactory (for example, vague or implausible), <p>the practitioner should determine what modifications or additions to procedures are necessary to resolve the matter and should consider the effect of the matter, if any, on other aspects of the engagement.</p> <p>9.27 The practitioner should consider whether individual misstatements (or deviations) identified during the engagement (other than those that are clearly trivial) have characteristics, for example, a root cause or a problematic pattern, that indicate the aggregate effect of individual misstatements (or deviations) is likely to be material. (Ref: par. 9.A32)</p>	<p>9.A32 “Clearly trivial” is not another expression for “not material.” Matters that are clearly trivial will be of a wholly different (smaller) order of importance than materiality determined in accordance with paragraph 9.19 and will be matters that are clearly inconsequential, whether taken individually or in aggregate and whether judged by any criteria of size, nature or circumstances. When there is any uncertainty about whether one or more items are clearly trivial, the matter is considered not to be clearly trivial. (Ref: par. 9.27)</p>
<p>Sampling</p> <p>9.28 If sampling is used, the practitioner should, when designing the sample, consider the purpose of the procedure and the characteristics of the population from which the sample will be drawn. Sampling involves</p> <ul style="list-style-type: none"> a. determining a sample size sufficient to reduce sampling risk to an acceptably low level. b. selecting items for the sample in such a way that the practitioner can reasonably expect the sample to be representative of the relevant population and likely to provide the practitioner with a reasonable basis for conclusions about the population. c. treating a selected item to which the practitioner is unable to apply the designed procedures or suitable alternative procedures as a deviation 	<p>Sampling</p> <p>9.A33 The AICPA Audit Guide <i>Audit Sampling</i> provides guidance that may be useful to a practitioner who has decided to use sampling in performing attestation procedures. (Ref: par. 9.28)</p>

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<p>from the prescribed control in the case of tests of controls, or a misstatement in the case of tests of details, a selected item to which the practitioner is unable to apply the designed procedures or suitable alternative procedures.</p> <p>d. investigating the nature and cause of deviations or misstatements identified and evaluating their possible effect on the purpose of the procedure and on other areas of the engagement.</p> <p>e. evaluating the results of the sample, including sampling risk and projecting misstatements (or deviations) found in the sample to the population, and</p> <p>f. evaluating whether the use of sampling has provided an appropriate basis for conclusions about the population that has been tested.</p> <p>(Ref: par. 9.A33)</p>	
<p>Analytical Procedures Performed in Response to Assessed Risks</p> <p>9.29 When designing and performing analytical procedures in response to assessed risks, the practitioner should</p> <p>a. determine the suitability of particular analytical procedures for the subject matter, taking into account the assessed risks of material misstatement and any related tests of details;</p> <p>b. evaluate the reliability of data from which the practitioner’s expectation is developed, taking into account the source, comparability, nature, and relevance of information available, and controls over their preparation; and</p> <p>c. develop an expectation that is sufficiently precise to identify possible material misstatements (or deviations) (taking into account whether analytical procedures are to be performed alone or in combination with tests of details).</p> <p>(Ref: par.9.A34–9.A35)</p> <p>9.30 If analytical procedures identify fluctuations or relationships that are inconsistent with other relevant information or that differ significantly from expected amounts or ratios, the practitioner should investigate such differences by</p> <p>a. inquiring of the responsible party and obtaining additional evidence relevant to its responses and</p> <p>b. performing other procedures as necessary in the circumstances.</p>	<p>Analytical Procedures Performed in Response to Assessed Risks</p> <p>9.A34 An understanding of the purposes of analytical procedures and the limitations of those procedures is important. Accordingly, the identification of the relationships and types of data used, as well as conclusions reached when recorded amounts are compared to expectations, requires professional judgment by the practitioner. (Ref: par. 9.29)</p> <p>9.A35 Analytical procedures involve comparisons of expectations developed by the practitioner to recorded amounts or ratios developed from recorded amounts. The practitioner develops such expectations by identifying and using plausible relationships that are reasonably expected to exist based on the practitioner’s understanding of the subject matter; the practices used to measure, recognize, and record the subject matter; and, if applicable, the industry in which the entity operates. (Ref: par. 9.29)</p>

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<p>Fraud, Laws, and Regulations</p> <p>9.31 The practitioner should.</p> <ul style="list-style-type: none"> • consider whether risk assessment procedures and other procedures related to understanding the subject matter indicate risk of material misstatement due to fraud or noncompliance with laws or regulations. • make inquiries of appropriate parties to determine whether they have knowledge of any actual, suspected, or alleged fraud or noncompliance with laws or regulations affecting the subject matter. • evaluate whether there are unusual or unexpected relationships within the subject matter, or between the subject matter and other related information, that indicate risks of material misstatement due to fraud or noncompliance with laws or regulations. • evaluate whether other information obtained indicates risk of material misstatement due to fraud or noncompliance with laws or regulations. 	<p>Fraud, Laws, and Regulations</p>
<p>9.32 The practitioner should respond appropriately to fraud or suspected fraud and noncompliance or suspected noncompliance with laws or regulations affecting the subject matter that is identified during the engagement. (Ref: par. 9.A36Error! Reference source not found.–9.A37)</p>	<p>9.A36 In responding to fraud or suspected fraud identified during the engagement, it may be appropriate, unless prohibited by law, regulation, or ethics standards; for the practitioner to, for example,</p> <ul style="list-style-type: none"> • discuss the matter with the appropriate party(ies). • request that the responsible party consult with an appropriately qualified third party, such as the entity’s legal counsel or a regulator. • consider the implications of the matter in relation to other aspects of the engagement, including the practitioner’s risk assessment and the reliability of written representations from the responsible party. • obtain legal advice about the consequences of different courses of action. • communicate with third parties (for example, a regulator) • withdraw from the engagement. <p>(Ref: par. 9.32)</p> <p>9.A37 The actions noted in paragraph 9.A36 also may be appropriate in responding to noncompliance or suspected noncompliance with laws and regulations identified during the engagement. It may be appropriate to</p>

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	<p>describe the matter in a separate paragraph in the practitioner's report, unless the practitioner</p> <ul style="list-style-type: none"> a. is precluded by the responsible party from obtaining sufficient appropriate evidence to evaluate whether noncompliance that may be material to the subject matter has, or is likely to have, occurred, in which case paragraphs 9.65a and 9.74 apply, or b. concludes that the noncompliance results in a material misstatement of the subject matter, in which case paragraph 9.65b applies. <p>(Ref: par. 9.32)</p>
<p>Revision of Risk Assessment 9.33 The practitioner's assessment of the risks of material misstatement may change during the course of the engagement as additional evidence is obtained. In circumstances in which the practitioner obtains evidence from performing further procedures, or if new information is obtained, either of which is inconsistent with the evidence on which the practitioner originally based the assessment, the practitioner should revise the assessment and modify the planned procedures accordingly. (Ref: par. 9.A38–9.A39)</p>	<p>9.A38 Information may come to the practitioner's attention that differs significantly from that on which the determination of planned procedures was based. As the practitioner performs planned procedures, the evidence obtained may cause the practitioner to perform additional procedures. Such procedures may include asking the responsible party to examine the matter identified by the practitioner and to make adjustments to the subject matter if appropriate. (Ref: par. 9.33)</p> <p>9.A39 The practitioner may become aware of a matter(s) that causes the practitioner to believe the subject matter may be materially misstated, for example, when performing analytical procedures the practitioner identifies a fluctuation or relationship that is inconsistent with other relevant information or that differs significantly from expectations. (Ref: par. 9.33)</p>
<p>Evaluating the Reliability of Information Produced by the Entity 9.34 When using information produced by the entity, the practitioner should evaluate whether the information is sufficiently reliable for the practitioner's purposes, including, as necessary, the following:</p> <ul style="list-style-type: none"> a. Obtaining evidence about the accuracy and completeness of the information b. Evaluating whether the information is sufficiently precise and detailed for the practitioner's purposes 	
<p>Using the Work of a Practitioner's Specialist 9.35 When the practitioner expects to use the work of a practitioner's specialist, the practitioner should do the following: (Ref: par. 9.A40-9.A48)</p>	<p>Using the Work of a Practitioner's Specialist <i>Integrating the Work of a Practitioner's Specialist</i> 9.A40 Direct examination engagements may be performed on a wide range of subject matters that require specialized skills and knowledge beyond those</p>

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	<p>possessed by the practitioner and for which the work of a practitioner’s specialist is used. In some situations, the practitioner’s specialist will be consulted to provide advice on an individual matter, but the greater the significance of the work of the practitioner’s specialist in the context of the engagement, the more likely it is that the specialist will work as part of a multidisciplinary team comprising subject matter specialists and other attestation personnel. The more that specialist’s work is integrated in nature, timing, and extent with the overall work effort, the more important is effective two-way communication between the practitioner’s specialist and other attestation personnel. Effective two-way communication facilitates the proper integration of the specialist’s work with the work of others on the engagement. (Ref: par. 9.35)</p> <p>9.A41 When the work of a practitioner’s specialist is to be used, it may be appropriate to perform some of the procedures required by paragraph 9.35 at the engagement acceptance or continuance stage. This is particularly so when the work of the practitioner’s specialist is to be used in the early stages of the engagement, for example, during initial planning and risk assessment. (Ref: par. 9.35)</p> <p><i>The Practitioner’s Firm’s Quality Control Policies and Procedures.</i></p> <p>9.A42 Engagement teams are entitled to rely on their own firm’s system of quality control, unless information provided by the firm or other parties suggests otherwise. The extent of that reliance will vary with the circumstances and may affect the nature, timing, and extent of the practitioner’s procedures with respect to matters, such as the following:</p> <ul style="list-style-type: none"> • Competence and capabilities, through recruitment and training programs • The practitioner’s evaluation of the objectivity of the practitioner’s internal specialist (The practitioner’s internal specialists are subject to relevant ethical requirements, including those pertaining to independence.) • The practitioner’s evaluation of the adequacy of the practitioner’s internal specialist’s work (For example, the firm’s training programs may provide the practitioner’s internal specialists with an appropriate understanding of the interrelationship of their expertise with the evidence gathering process. Reliance on such training and other firm

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	<p>processes, such as protocols for scoping the work of the practitioner’s internal specialists, may affect the nature, timing, and extent of the practitioner’s procedures to evaluate the adequacy of the practitioner’s specialist’s work.)</p> <ul style="list-style-type: none"> • Adherence to regulatory and legal requirements, through monitoring processes • Agreement with the practitioner’s specialist <p>Such reliance does not reduce the practitioner’s responsibility to meet the requirements of this chapter.</p> <p>(Ref: par. 9.35)</p>
<p>a. Evaluate whether the practitioner’s specialist has the necessary competence, capabilities, and objectivity for the practitioner’s purposes. In the case of a practitioner’s external specialist, the evaluation of objectivity should include inquiry regarding interests and relationships that may create a threat to the objectivity of the practitioner’s specialist. (Ref: par. 9.A43–9.A46)</p>	<p><i>The Competence, Capabilities, and Objectivity of a Practitioner’s Specialist</i></p> <p>9.A43 Information regarding the competence, capabilities, and objectivity of a practitioner’s specialist may come from a variety of sources, such as the following:</p> <ul style="list-style-type: none"> • Personal experience with previous work of that specialist • Discussions with that specialist • Discussions with other practitioners or others who are familiar with that specialist’s work • Knowledge of that specialist’s qualifications, membership of a professional body or industry association, license to practice, or other forms of external recognition • Published papers or books written by that specialist • The firm’s quality control policies and procedures <p>(Ref: par. 9.35a)</p> <p>9.A44 Although a practitioner’s specialists do not require the same proficiency as the practitioner in performing all aspects of a direct examination engagement, a practitioner’s specialist whose work is used may need a sufficient understanding of relevant chapters of the attestation standards to enable that specialist to relate the work assigned to that specialist to the engagement objective. (Ref: par. 9.35a)</p> <p>9.A45 The evaluation of the significance of threats to objectivity and of whether there is a need for safeguards may depend upon the role of the practitioner’s specialist and the significance of the specialist’s work in the context of the engagement. There may be some circumstances in which</p>

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	<p>safeguards cannot reduce threats to an acceptable level, for example, if in a direct examination engagement a practitioner’s specialist is an individual who has played a significant role in measuring, evaluating, or disclosing the subject matter. (Ref: par. 9.35a)</p> <p>9.A46 When evaluating the objectivity of a practitioner’s external specialist, it may be relevant to</p> <ul style="list-style-type: none"> • inquire of the appropriate party(ies) about any known interests or relationships that the appropriate party(ies) has with the practitioner’s external specialist that may affect that specialist’s objectivity. • discuss with that specialist any applicable safeguards, including any professional requirements that apply to that specialist, and evaluate whether the safeguards are adequate to reduce threats to an acceptable level. Interests and relationships that it may be relevant to discuss with the practitioner’s specialist include <ul style="list-style-type: none"> — financial interests. — business and personal relationships. — provision of other services by the specialist, including by the organization in the case of an external specialist that is an organization. <p>In some cases, it may also be appropriate for the practitioner to obtain a written representation from the practitioner’s external specialist about any interests or relationships with the appropriate party(ies) of which that specialist is aware.</p> <p>(Ref: par. 9.35a)</p>
<p><i>b.</i> Obtain a sufficient understanding of the field of expertise of a practitioner’s specialist to enable the practitioner to</p> <ol style="list-style-type: none"> <i>i.</i> determine the nature, scope, and objectives of that specialist’s work for the practitioner’s purposes and <i>ii.</i> evaluate the adequacy of that work for the practitioner’s purposes. <p>(Ref: par. 9.A47)</p>	<p><i>Obtaining an Understanding of the Field of Expertise of a Practitioner’s Specialist</i></p> <p>9.A47 Aspects of a practitioner’s specialist’s field of expertise relevant to the practitioner’s understanding may include the following:</p> <ul style="list-style-type: none"> • Whether that specialist’s field has areas of specialty within it that are relevant to the engagement • Whether any professional or other standards and regulatory or legal requirements apply • What assumptions and methods, including models when applicable, are used by the practitioner’s specialist and whether they are generally accepted within that specialist’s field and appropriate in the circumstances of the engagement • The nature of internal and external data or information the

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	practitioner's specialist uses (Ref: par. 9.35b)
<p>c. Agree with the practitioner's specialist regarding</p> <ul style="list-style-type: none"> i. the nature, scope, and objectives of that practitioner's specialist's work; ii. the respective roles and responsibilities of the practitioner and that specialist; iii. the nature, timing, and extent of communication between the practitioner and that specialist, including the form of any report or documentation to be provided by that specialist; and iv. the need for the practitioner's specialist to observe confidentiality requirements. <p>(Ref: par. 9.A48)</p>	<p><i>Agreement With a Practitioner's Specialist</i> 9.A48 The matters noted in paragraph 9.A42 may affect the level of detail and formality of the agreement between the practitioner and the practitioner's specialist, including whether it is appropriate that the agreement be in writing. The agreement between the practitioner and a practitioner's external specialist is often in the form of an engagement letter. (Ref: par. 9.35c)</p>
<p>d. Evaluate the adequacy of the work of the practitioner's specialist for the practitioner's purposes, including</p> <ul style="list-style-type: none"> i. the relevance and reasonableness of the findings and conclusions of the practitioner's specialist and their consistency with other evidence; ii. if the work of the practitioner's specialist involves the use of significant assumptions and methods; <ul style="list-style-type: none"> (1) obtaining an understanding of those assumptions and methods and (2) evaluating the relevance and reasonableness of those assumptions and methods in the circumstances, giving consideration to the rationale and support provided by the practitioner's specialist, and in relation to the practitioner's other findings and conclusions; iii. if the work of the practitioner's specialist involves the use of source data that are significant to the work of the practitioner's specialist, the relevance, completeness, and accuracy of that source data. <p>9.36 If the practitioner determines that the work of the practitioner's specialist is not adequate for the practitioner's purposes, the practitioner should</p> <ul style="list-style-type: none"> a. agree with the practitioner's specialist on the nature and extent of further work to be performed by the practitioner's specialist, or b. perform additional procedures appropriate to the circumstances. <p>9.37 The nature, timing, and extent of the procedures a practitioner performs when the practitioner expects to use the work of a practitioner's specialist will vary depending on the circumstances. In determining the nature, timing, and</p>	

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<p>extent of those procedures, the practitioner should consider the following: (See chapter 1.⁴):</p> <ul style="list-style-type: none"> a. The significance of that specialist’s work in the context of the engagement (See also paragraphs 9.A40–9.A41.) b. The nature of the matter to which that specialist’s work relates c. The risks of material misstatement in the matter to which that specialist’s work relates d. The practitioner’s knowledge of and experience with previous work performed by that specialist e. Whether that specialist is subject to the practitioner’s firm’s quality control policies and procedures (See also paragraph 9.A42.) 	
<p>Using the Work of Internal Auditors</p> <p>9.38 When the practitioner expects to use the work of the internal audit function in obtaining evidence or to use internal auditors to provide direct assistance, the practitioner should determine whether the work can be used for purposes of the direct examination by evaluating</p> <ul style="list-style-type: none"> a. the level of competence of the internal audit function or the individual internal auditors providing direct assistance; b. the extent to which the internal audit function’s organizational status and relevant policies and procedures support the objectivity of the internal audit function or for internal auditors providing direct assistance, the existence of threats to the objectivity of those internal auditors and the related safeguards applied to reduce or eliminate those threats; and c. when using the work of the internal audit function, the application by the internal audit function of a systematic and disciplined approach, including quality control. <p>(Ref: par.9.A49–9.A51)</p>	<p>Using the Work of Internal Auditors</p> <p>9.A49 Activities similar to those performed by an internal audit function may be conducted by functions with other titles within an entity. Some or all of the activities of an internal audit function may also be outsourced to a third party service provider. Neither the title of the function nor whether it is performed by the entity or a third party service provider are sole determinants of whether or not the practitioner can use the work of internal auditors. Rather it is the nature of the activities, the extent to which the internal audit function’s organizational status and relevant policies and procedures support the objectivity of the internal auditors, competence, and systematic and disciplined approach of the function that are relevant. References in this chapter to the work of the internal audit function include relevant activities of other functions or third party providers that have these characteristics. (Ref: par. 9.38)</p> <p>9.A50 A practitioner planning to use the work of the internal audit function to obtain evidence may find it effective and efficient to discuss the planned use of the work with the internal audit function as a basis for coordinating activities. (Ref: par. 9.38)</p> <p>9.A51 The practitioner has sole responsibility for the conclusion(s) expressed, and that responsibility is not reduced by the practitioner’s use of</p>

⁴ Paragraph 1.32 of chapter 1.

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<p>9.39 When using the work of the internal audit function, the practitioner should perform sufficient procedures on the body of work of the internal audit function as a whole that the practitioner plans to use to determine its adequacy for the purpose of the direct examination engagement. The practitioner should also reperform some of the body of work of the internal audit function that the practitioner intends to use in obtaining evidence.</p> <p>9.40 Prior to using internal auditors to provide direct assistance, the practitioner should obtain written acknowledgment from the responsible party, that internal auditors providing direct assistance to the practitioner will be allowed to follow the practitioner’s instructions, and that the responsible party will not intervene in the work the internal auditor performs for the practitioner.</p> <p>9.41 When using internal auditors to provide direct assistance to the practitioner, the practitioner should direct, supervise, and review the work of the internal auditors.</p> <p>9.42 Because the practitioner has sole responsibility for the conclusion(s) expressed, the practitioner should make all significant judgments in the direct examination engagement, including when using the work of the internal audit function in obtaining evidence. To prevent undue use of the internal audit function in obtaining evidence, the external auditor should plan to use less of the work of the function and perform more of the work directly:</p> <ul style="list-style-type: none"> a. The more judgment is involved in <ul style="list-style-type: none"> i. planning and performing relevant procedures or ii. evaluating the evidence obtained b. the higher the assessed risk of material misstatement; 	<p>the work of internal auditors on the engagement. The objectivity and competence of internal auditors are important in determining whether to use and, if so, the nature and extent of the use of their work. However, a high degree of objectivity cannot compensate for a low degree of competence, nor can a high degree of competence compensate for a low degree of objectivity. Additionally, neither a high level of competence nor strong support for the objectivity of the internal auditors compensates for the lack of a systematic and disciplined approach when using the work of the internal audit function. (Ref: par. 9.38)</p>

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<p>c. the less the internal audit function’s organizational status and relevant policies and procedures adequately support the objectivity of the internal auditors; and</p> <p>d. the lower the level of competence of the internal audit function.</p> <p>9.43 Before the conclusion of the engagement the practitioner should evaluate whether the use of the work of the internal audit function or the use of internal auditors to provide direct assistance results in the practitioner still being sufficiently involved in the direct examination given the practitioner’s sole responsibility for the conclusion(s) expressed.</p>	
<p>Evaluating the Results of Procedures</p> <p>9.44 The practitioner should accumulate misstatements (or deviations) identified during the engagement, other than those that are clearly trivial. (Ref: par. 9.A52–9.A53)</p>	<p>Evaluating the Results of Procedures</p> <p>9.A52 Uncorrected misstatements (or deviations) are accumulated during the engagement for the purpose of evaluating whether, individually or in aggregate, they are material when forming the practitioner’s conclusion(s). (See also paragraph 9.57<i>b</i>) (Ref: par. 9.44)</p> <p>9.A53 “Clearly trivial” is not another expression for “not material.” Matters that are clearly trivial will be of a wholly different (smaller) order of magnitude than materiality and will be matters that are clearly inconsequential, whether taken individually or in the aggregate and whether judged by any criteria of size, nature, or circumstances. When there is any uncertainty about whether one or more items are clearly trivial, the matter is considered not to be clearly trivial. (Ref: par. 9.44)</p>
<p>Considering Subsequent Events and Subsequently Discovered Facts</p> <p>9.45 The practitioner should inquire of the responsible party, and if different, the engaging party, and apply other appropriate procedures to obtain evidence regarding events subsequent to the period (or point in time) covered by the examination engagement up to the date of the practitioner’s report that could have a significant effect on the subject matter . If the practitioner becomes aware, through inquiry or otherwise, of such an event, or any other event that is of such a nature and significance that its disclosure is necessary to prevent report users from being misled, and information about that event is not adequately disclosed by the responsible party in the subject matter or in its assertion, the practitioner should take appropriate action. (Ref: par. 9.A54–9.A56)</p>	<p>Considering Subsequent Events and Subsequently Discovered Facts</p> <p>9.A54 For certain subject-matter chapters of the attestation standards, specific subsequent events requirements and related application guidance have been developed for engagement performance and reporting. (Ref: par. 9.45)</p> <p>9.A55 Procedures that a practitioner may perform to identify subsequent events, include inquiring about and considering information</p> <ul style="list-style-type: none"> • contained in relevant reports issued during the subsequent period by internal auditors, other practitioners, or regulatory agencies • obtained through other professional engagements for that entity.

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	<p>(Ref: par. 9.45)</p> <p>9.A56 If the responsible party refuses to disclose a subsequent event for which disclosure is necessary to prevent report users from being misled, appropriate actions the practitioner may take include</p> <ul style="list-style-type: none"> • disclosing the event in the practitioner’s report and modifying the practitioner’s conclusion(s) • withdrawing from the engagement <p>(Ref: par. 9.45)</p>
<p>9.46 The practitioner has no responsibility to perform any procedures regarding the subject matter after the date of the practitioner’s report. Nevertheless, the practitioner should respond appropriately to facts that become known to the practitioner after the date of the practitioner’s report that, had they been known to the practitioner at that date, may have caused the practitioner to revise the practitioner’s report. (Ref: par.9.A57– 9.A58)</p>	<p>9.A57 Subsequent to the date of the practitioner’s report, the practitioner may become aware of facts that, had they been known to the practitioner at that date, may have caused the practitioner to revise the practitioner’s report. In such circumstances, the practitioner undertakes to determine whether the facts existed at the date of the practitioner’s report and, if so, whether persons are currently using or likely to use the practitioners’ report and related subject matter who would attach importance to these facts. This may include discussing the matter with the appropriate party(ies) and requesting the appropriate party(ies)’s cooperation in whatever investigation or further action that may be necessary. The specific actions to be taken in a particular case by the appropriate party(ies) and the practitioner may vary with the circumstances. Consideration may be given to, among other things, the time elapsed since the date of the practitioner’s report and whether issuance of a subsequent report is imminent. The practitioner may need to perform additional procedures deemed necessary to determine whether the subject matter needs revision and whether the previously issued report continues to be appropriate. (Ref: par. 9.46)</p> <p>9.A58 Depending on the circumstances, the practitioner may determine that notification of the situation by the appropriate party(ies) to persons who are currently using or likely to use the practitioners’ report who would attach importance to the facts is necessary. This may be the case, for example, when</p> <ul style="list-style-type: none"> a. the practitioner’s report is not to be relied upon because the subject matter needs revision or the practitioner is unable to determine whether revision is necessary, and

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	<p><i>b.</i> issuance of a subsequent report is not imminent.</p> <p>If the appropriate party(ies) failed to take the necessary steps to prevent reliance on the practitioner’s report, the practitioner’s course of action depends upon the practitioner’s legal and ethical rights and obligations. Consequently, the practitioner may consider it appropriate to seek legal advice prior to making any disclosure of the situation. Disclosure of the situation directly by the practitioner may include a description of the nature of the matter and of its effect on the subject matter and the practitioner’s report, avoiding comments concerning the conduct or motives of any person. (Ref: par. 9.46))</p>
<p>9.47 The practitioner should evaluate the sufficiency and appropriateness of the evidence obtained in the context of the engagement and, if necessary, attempt to obtain further evidence. The practitioner should consider all relevant evidence, regardless of whether it appears to corroborate or to contradict the measurement or evaluation of the subject matter against the criteria.</p> <p>(Ref: par. 9.A59–9.A63)</p> <p>9.48 If the practitioner is unable to obtain necessary further evidence, the practitioner should consider the implications for the practitioner’s conclusion(s) in paragraphs 9.65–9.77.</p>	<p>9.A59 Sufficient appropriate evidence is necessary to support the practitioner’s conclusion(s) and direct examination report. It is cumulative in nature and is primarily obtained from procedures performed during the course of the engagement. It may, however, also include information obtained from other sources such as previous engagements (provided the practitioner has determined whether changes have occurred since the previous engagement that may affect its relevance to the current engagement) or a firm’s quality control procedures for client acceptance and continuance. Evidence may come from sources inside and outside the appropriate party(ies). Also, information that may be used as evidence may have been prepared by a specialist employed or engaged by the appropriate party(ies). Evidence comprises both information that supports and corroborates aspects of the subject matter and any information that contradicts aspects of the subject matter. In addition, in some cases, the absence of information (for example, refusal by the appropriate party(ies) to provide a requested representation) is considered by the practitioner and, therefore, also constitutes evidence. (Ref: par.9.47)</p> <p>9.A60 The sufficiency and appropriateness of evidence are interrelated. Sufficiency of evidence is the measure of the quantity of evidence. The quantity of the evidence needed is affected by the risks of material misstatement and also by the quality of such evidence. (Ref: par. 9.47)</p> <p>9.A61 Appropriateness of evidence is the measure of the quality of evidence; that is, its relevance and reliability in providing support for the practitioner’s conclusion(s). The reliability of evidence is influenced by its source and by its nature and is dependent on the individual circumstances under which it is obtained. Generalizations about the reliability of various</p>

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	<p>kinds of evidence can be made; however, such generalizations are subject to important exceptions. Even when evidence is obtained from sources external to the responsible party, circumstances may exist that could affect its reliability. For example, evidence obtained from an independent external source may not be reliable if the source is not knowledgeable. Recognizing that exceptions may exist, the following generalizations about the reliability of evidence may be useful:</p> <ul style="list-style-type: none"> • Evidence is more reliable when it is obtained from independent sources outside the appropriate party(ies). • Evidence that is generated internally is more reliable when the related controls are effective. • Evidence obtained directly by the practitioner (for example, observation of the application of a control) is more reliable than evidence obtained indirectly or by inference (for example, inquiry about the application of a control). • Evidence is more reliable when it exists in documentary form, whether paper, electronic, or other media (for example, a contemporaneously written record of a meeting is ordinarily more reliable than a subsequent oral representation of what was discussed). • Evidence provided by original documents is more reliable than evidence provided by photocopies, facsimiles, or documents that have been filmed, digitized, or otherwise transformed into electronic form, the reliability of which may depend on the controls over their preparation and maintenance. <p>(Ref: par. 9.47)</p> <p>9.A62 Evidence obtained from different sources or of a different nature ordinarily provides more assurance than evidence from items considered individually. In addition, obtaining evidence from different sources or of a different nature may indicate that an individual item of evidence is not reliable. For example, corroborating information obtained from a source independent of the responsible party may increase the assurance the practitioner obtains from a representation from the responsible party. Conversely, when evidence obtained from one source is inconsistent with that obtained from another, the practitioner determines what additional procedures</p>

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	<p>are necessary to resolve the inconsistency. (Ref: par. 9.47)</p> <p>9.A63 Whether sufficient appropriate evidence has been obtained on which to base the practitioner’s conclusion(s) is a matter of professional judgment. (Ref: par. 9.47)</p>
<p>Written Representations 9.49 When the engaging party and responsible party are the same, the practitioner should request written representations in the form of a letter addressed to the practitioner. The representations should</p> <ul style="list-style-type: none"> a. state that all relevant matters are reflected in the measurement or evaluation of the subject matter. b. state that all known matters contradicting the subject matter and any communication from regulatory agencies or others affecting the subject matter have been disclosed to the practitioner, including communications received between the end of the period covered by the practitioner’s report and the date of the practitioner’s report. c. acknowledge responsibility for <ul style="list-style-type: none"> i. the underlying subject matter; and ii. determining that such criteria are appropriate for the engaging party’s purposes. d. state that any known events subsequent to the period (or point in time) of the subject matter being reported on that would have a material effect on the subject matter have been disclosed to the practitioner. (Ref: par. 9.A66) e. state that it has provided the practitioner with all relevant information and access, as agreed upon in the terms of the engagement. f. if applicable, state that the responsible party believes the effects of uncorrected misstatements (or deviations) are immaterial, individually and in the aggregate, to the subject matter. (Ref: par. 9.A67) 	<p>Written Representations 9.A64 Written confirmation of oral representations reduces the possibility of misunderstandings between the practitioner and the responsible party. The person(s) from whom the practitioner requests written representations is ordinarily a member of senior management or those charged with governance depending on, for example, the management and governance structure of the responsible party(ies), which may vary by entity, reflecting influences such as size and ownership characteristics. (Ref: par. 9.49)</p> <p>9.A65 Representations by the responsible party cannot replace other evidence the practitioner could reasonably expect to be available. Although written representations provide necessary evidence, they do not provide sufficient appropriate evidence on their own about any of the matters with which they deal. Furthermore, the fact that the practitioner has received reliable written representations does not affect the nature or extent of other evidence that the practitioner obtains. (Ref: par. 9.49)</p> <p>9.A66 A discussion of what is considered a material effect on the subject matter may be included explicitly in the representation letter in qualitative or quantitative terms. (Ref: par. 9.49e and 9.51e)</p> <p>9.A67 A summary of uncorrected misstatements (or deviations) ordinarily is included in or attached to the written representation. (Ref: par. 9.49g)</p>

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<p><i>g.</i> if applicable, state that significant assumptions used in making any material estimates are reasonable.</p> <p><i>h.</i> state that the responsible party has disclosed to the practitioner</p> <p style="padding-left: 20px;"><i>i.</i> all deficiencies in internal control relevant to the engagement of which the responsible party is aware</p> <p style="padding-left: 20px;"><i>ii.</i> its knowledge of any actual, suspected, or alleged fraud; or noncompliance with laws or regulations affecting the subject matter ; and</p> <p style="padding-left: 20px;"><i>iii.</i> other matters as the practitioner deems appropriate.</p> <p>(Ref: par. 9.A64–9.A67)</p> <p>9.50 When the engaging party and the responsible party are not the same, the practitioner should request from the responsible party the same representations as those in paragraph 9.49, except for the representation in paragraph 9.49c(ii) .</p>	<p>9.A68 Because the engaging party is not the responsible party, the responsible party ordinarily will not be privy to the objectives of the engagement. Therefore the responsible party ordinarily would not be in a position to determine the appropriateness of the criteria. (Ref: par. 9.50)</p>
<p>9.51 When the engaging party is not the responsible party, the practitioner should request written representations from the engaging party in the form of a letter addressed to the practitioner. The representations should</p> <p style="padding-left: 20px;"><i>a.</i> acknowledge that the responsible party is responsible for the underlying subject matter.</p> <p style="padding-left: 20px;"><i>b.</i> acknowledge the engaging party’s responsibility for determining that the criteria are suitable and appropriate for its purposes.</p> <p style="padding-left: 20px;"><i>c.</i> state that the engaging party is not aware of any material misstatements (or deviations) in the subject matter.</p> <p style="padding-left: 20px;"><i>d.</i> state that the engaging party has disclosed to the practitioner all known events subsequent to the period (or point in time) of the subject matter being reported on that would have a material effect on the subject matter. (Ref: par. 9.A66)</p> <p style="padding-left: 20px;"><i>e.</i> address other matters as the practitioner deems appropriate.</p>	
<p>9.52 When written representations are directly related to matters that are material to the subject matter , the practitioner should</p>	

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<p><i>a.</i> evaluate their reasonableness and consistency with other evidence obtained, including other representations (oral or written); and</p> <p><i>b.</i> consider whether those making the representations can be expected to be well informed on the particular matters.</p> <p>9.53 The date of the written representations should be as of the date of the direct examination report. The written representations should address the subject matter and periods covered by the practitioner’s conclusion(s).</p>	
<p>Requested Written Representations Not Provided or Not Reliable</p> <p>9.54 When one or more of the requested written representations are not provided; or the practitioner concludes that there is sufficient doubt about the competence, integrity, ethical values, or diligence of those providing the written representations; or the practitioner concludes that the written representations are otherwise not reliable; the practitioner should</p> <p><i>a.</i> discuss the matter with the appropriate party(ies);</p> <p><i>b.</i> reevaluate the integrity of those from whom the representations were requested or received and evaluate the effect that this may have on the reliability of representations and evidence in general; and</p> <p><i>c.</i> if any of the matters are not resolved to the practitioner’s satisfaction, take appropriate actions, including determining the possible effect on the practitioner’s report.</p> <p>(Ref: par. 9.A69–9.A71)</p>	<p>Requested Written Representations Not Provided or Not Reliable</p> <p>9.A69 The refusal by the engaging party to furnish such evidence in the form of written representations will usually constitute a violation of the terms of engagement sufficient to preclude an unmodified conclusion(s) and may be sufficient to cause the practitioner to withdraw from the direct examination engagement. (Ref: par. 9.54)</p> <p>9.A70 Circumstances in which the practitioner may not be able to obtain requested written representations from the responsible party include, for example, when:</p> <ul style="list-style-type: none"> • A third party engages the practitioner to undertake a direct examination engagement on subject matter but does not have a relationship with the responsible party of the kind necessary to ensure that the responsible party responds to the practitioner’s request for a written representation. • The direct examination engagement is undertaken against the wishes of the responsible party. This may be the case when, for example, the engagement is undertaken pursuant to a law or regulation. <p>(Ref: par. 9.54)</p> <p>9.A71 In these or similar circumstances, the practitioner may not have access to the evidence needed to obtain reasonable assurance. If the practitioner is unable to obtain sufficient appropriate evidence, a scope limitation exists. (Ref: par. 9.54)</p>
<p>Other Information</p> <p>9.55 If prior to or after the release of the practitioner’s direct examination report on subject matter, the practitioner is willing to permit the inclusion of the</p>	<p>Other Information</p> <p>9.A72 Further actions that may be appropriate if the practitioner identifies a material inconsistency or becomes aware of a material misstatement of fact</p>

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<p>practitioner’s direct examination report in a document that contains the subject matter and other information, the practitioner should read that other information to identify material inconsistencies, if any, with the subject matter or the direct examination report. If on reading that other information, in the practitioner’s professional judgment</p> <p style="margin-left: 20px;">a. a material inconsistency between that other information and the subject matter , or the direct examination report exists; or</p> <p style="margin-left: 20px;">b. a material misstatement of fact exists in that other information, the subject matter or the direct examination report;</p> <p>the practitioner should discuss the matter with the responsible party and take further action as appropriate.</p> <p>(Ref: par. 9.A72–9.A73)</p>	<p>include, for example, the following:</p> <ul style="list-style-type: none"> • Requesting the appropriate party(ies) to consult with a qualified third party, such as the appropriate party(ies)’s legal counsel • Obtaining legal advice about the consequences of different courses of action • If required or permissible, communicating with third parties (for example, a regulator) • Describing the material inconsistency in the direct examination report • Withdrawing from the engagement, when withdrawal is possible under applicable laws or regulations <p>(Ref: par. 9.55)</p> <p>9.A73 Other information does not include information contained on the appropriate party(ies)’s website. Websites are a means of distributing information and are not, themselves, documents for the purposes of paragraph 9.55. (Ref: par. 9.55)</p>
<p>Description of Criteria</p> <p>9.56 The practitioner should evaluate whether the written description of the subject matter adequately refers to or describes the criteria. (Ref: par. 9.A74–9.A75)</p>	<p>Description of Criteria</p> <p>9.A74 The description of the criteria on which the subject matter is based is particularly important when there are significant differences between various criteria regarding how particular matters may be treated in the subject matter. (Ref: par. 9.56)</p> <p>9.A75 A description of the criteria that states that the subject matter is prepared in accordance with [or based on] particular criteria is appropriate only if the subject matter complies with all relevant requirements of those criteria that are effective. (Ref: par. 9.56)</p>
<p>Forming the Conclusion(s)</p> <p>9.57 The practitioner should form a conclusion(s) about whether the subject matter is in accordance with [or based on] the criteria, in all material respects. In forming that conclusion, the practitioner should evaluate</p> <p style="margin-left: 20px;">a. the practitioner’s conclusion regarding the sufficiency and appropriateness of evidence obtained; and (Ref: par. 9.A76)</p> <p style="margin-left: 20px;">b. whether uncorrected misstatements (or deviations) are material, individually or in aggregate. (Ref: par. 9.A77)</p>	<p>Forming the Conclusion(s)</p> <p>9.A76 The practitioner’s professional judgment regarding what constitutes sufficient appropriate evidence is influenced by such factors as the following:</p> <ul style="list-style-type: none"> • The significance of a potential misstatement and the likelihood that it will have a material effect, individually or aggregated with other potential misstatements (or deviations), on the subject matter • The effectiveness of the responsible party’s responses to address the known risks • The experience gained during previous examination or review engagements with respect to similar potential misstatements (or deviations)

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	<ul style="list-style-type: none"> • The results of procedures performed, including whether such procedures identified specific misstatements (or deviations) • The source and reliability of the available information • The persuasiveness of the evidence • The practitioner’s understanding of the responsible party and its environment <p>(Ref: par. 9.57a)</p> <p>9.A77 A direct examination engagement is a cumulative and iterative process. As the practitioner performs planned procedures, the evidence obtained may cause the practitioner to change the nature, timing, or extent of other planned procedures. Information that differs significantly from the information on which the risk assessments and planned procedures were based may come to the practitioner’s attention, for example,</p> <ul style="list-style-type: none"> • the extent of the misstatements (or deviations) that the practitioner detects is greater than expected. (This may alter the practitioner’s professional judgment about the reliability of particular sources of information.) • the practitioner may become aware of discrepancies in relevant information or conflicting or missing evidence. • procedures performed toward the end of the engagement may indicate a previously unrecognized risk of material misstatement. In such circumstances, the practitioner may need to reevaluate the planned procedures. <p>(Ref: par. 9.57b)</p>
<p>Preparing the Report 9.58 The report should be in writing. (Ref: par. 9.A78–9.A80)</p>	<p>Preparing the Report 9.A78 Oral and other forms of expressing a conclusion(s) can be misunderstood without the support of a written report. For this reason, the practitioner may not report orally or by use of symbols (such as a web seal) under the attestation standards without also providing a written report that is readily available whenever the oral report is provided or the symbol is used. For example, a symbol could be hyperlinked to a written direct examination report on the Internet. (Ref: par. 9.58)</p> <p>9.A79 This chapter does not require a standardized format for reporting on all</p>

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	<p>direct examination engagements. Instead it identifies the basic elements that the direct examination report is to include. Direct examination reports are tailored to the specific engagement circumstances. The practitioner may use headings, separate paragraphs, paragraph numbers, typographical devices (for example, the bolding of text), and other mechanisms to enhance the clarity and readability of the direct examination report. (Ref: par. 9.58)</p>
	<p>9.A80 The practitioner may choose a “short form” or “long form” style of reporting to facilitate effective communication to the intended users. “Short-form” reports ordinarily include only the basic elements. “Long-form” reports include other information and explanations that are not intended to affect the practitioner’s conclusion(s). In addition to the basic elements, long-form reports may describe in detail the terms of the engagement, the applicable criteria being used, findings relating to particular aspects of the engagement, details of the qualifications and experience of the practitioner and others involved with the engagement, disclosure of materiality levels, and, in some cases, recommendations. The practitioner may find it helpful to consider the significance of providing such information to the information needs of the intended users. As required by paragraph X, additional information needs to be clearly separated from the practitioner’s conclusion(s) and phrased in such a manner so as make it clear that it is not intended to detract from that (those) conclusion(s). (Ref: par. 9.58)</p>
<p>Report Content 9.59 The practitioner’s direct examination report should include the following, unless the practitioner is disclaiming a conclusion(s), in which case items 9.59f, and 9.59g should be omitted:</p> <ul style="list-style-type: none"> a. A title that includes the word independent (Ref: par. 9.A81) b. An appropriate addressee as required by the circumstances of the engagement c. An identification or description of the subject matter being reported on, including the point in time or period of time to which the measurement or evaluation of the subject matter relates 	<p>Report Content 9.A81 A title indicating that the direct examination report is the report of an independent practitioner (for example, “Independent Practitioner’s Report,” “Report of Independent Certified Public Accountant,” or “Independent Accountant’s Report”) affirms that the practitioner has met all of the relevant ethical requirements regarding independence and, therefore, distinguishes the independent practitioner’s report from reports issued by others. (Ref: par. 9.59a)</p>
<ul style="list-style-type: none"> d. An identification of the criteria against which the underlying subject matter was measured or evaluated (Ref: par. 9.A82) 	<p>9.A82 The direct examination report may include the criteria or refer to them if they are included in the subject matter presentation or are otherwise readily</p>

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	<p>available. It may be relevant in the circumstances, to disclose</p> <ul style="list-style-type: none"> • the source of the criteria. • the measurement or evaluation methods used when the criteria allow for choice between a number of methods. • any significant interpretations made in applying the criteria in the engagement circumstances. • whether there have been any changes in the measurement or evaluation methods used. <p>(Ref: par. 9.59d)</p>
<p><i>e</i> A statement that identifies the responsible party and describes its responsibilities and the practitioner’s responsibilities (Ref: par. 9.A83)</p>	<p>9.A83 Identifying relative responsibilities informs the intended users that the responsible party is responsible for the subject matter, and the practitioner’s role is to independently express a conclusion(s) about it. (Ref: par. 9.59e)</p> <p>9.A84 The practitioner may wish to expand the discussion of the responsible party’s responsibility, for example, to indicate that the responsible party is responsible for the preparation and presentation of the subject matter in accordance with [or based on] the criteria, including the design, implementation, and maintenance of internal control to prevent or detect and correct misstatement of the subject matter, due to fraud or error. (Ref: par. 9.59e)</p>
<p><i>f</i> A statement that</p> <ul style="list-style-type: none"> <i>i.</i> the direct examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants <i>ii.</i> those standards require that the practitioner plan and perform the examination to obtain reasonable assurance about whether the subject matter is in accordance with [or based on] the criteria in all material respects (or equivalent language regarding the subject matter and criteria, such as the language used in the examples in paragraph 9.A85) (Ref: par. 9.A85); <i>iii.</i> the practitioner believes the evidence obtained is sufficient and 	<p>9.A85 The language in paragraph 9.59f(ii) may need to be tailored to reflect the nature of the subject matter and criteria for the engagement. Examples of language that meet the requirements in paragraph 9.59f(ii) include, “to obtain reasonable assurance about whether</p> <ul style="list-style-type: none"> • the subject matter is presented in accordance with [or based on] the criteria.” • the subject matter achieves the objectives.” for example, when the objectives are the criteria • The subject matter is presented fairly, in all material respects, based on the criteria. (The practitioner’s professional judgment concerning the fairness of the presentation of the subject matter relates to whether the measurement, recognition, presentation, and disclosure of all

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appropriate to provide a reasonable basis for the practitioner's conclusion(s)	<p>material items in the presentation of the subject matter achieve fair presentation.)</p> <p>(Ref: par. 9.59f(ii))</p>
<p>g. A description of the nature of a direct examination engagement (Ref: par. 9.A86-9.A87)</p>	<p>9.A86 A description of the nature of a direct examination engagement may state, for example, that</p> <ul style="list-style-type: none"> • an examination involves performing procedures to obtain evidence about the subject matter and that the nature, timing, and extent of the procedures selected depend on the practitioner's judgment, including an assessment of the risks of material misstatement of the subject matter, whether due to fraud or error. • a direct examination also involves examining evidence about the subject matter. • in making an assessment of the risks of material misstatement, the practitioner considered and obtained an understanding of internal control relevant to the subject matter in order to design procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of internal control. Accordingly no such opinion is expressed. <p>(Ref: par. 9.59g)</p> <p>9.A87 The practitioner may decide to more fully describe the practitioner's responsibility, for example, to</p> <ul style="list-style-type: none"> • perform procedures to obtain evidence based on the practitioner's assessment of the risk of material misstatement about whether the subject matter is presented in accordance with [or based on] the criteria. • obtain an understanding of internal control over the subject matter <p>(Ref: par. 9.59g)</p>
<p>h. A statement that describes significant inherent limitations, if any, associated with the measurement or evaluation of the underlying subject matter against the criteria (Ref: par. 9.A88)</p>	<p>9.A88 In some cases, identification of specific inherent limitations is required by a chapter of the attestation standards. For example, an examination report on a forecast under chapter 5, "Prospective Financial Information," indicates that "there will usually be differences between the forecasted and actual results, because events and circumstances frequently do not occur as</p>

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	<p>expected, and those differences may be material.” When not explicitly required by a chapter of the attestation standards, identification in the practitioner’s report of inherent limitations is based on the practitioner’s judgment. (Ref: par. 9.59h)</p>
<p><i>i.</i> An informative summary of the work performed as a basis for the practitioner’s conclusion(s) (Ref: par. 9.A89)</p>	<p>9.A89 Factors to consider in determining the level of detail to be provided in the summary of the work performed may include:</p> <ul style="list-style-type: none"> • Circumstances specific to the entity (for example, the differing nature of the entity’s activities compared to those typical in the sector). • Specific engagement circumstances affecting the nature and extent of the procedures performed. • The intended users’ expectations of the level of detail to be provided in the report, based on market practice, or applicable law or regulation. <p>It is important that the summary be written in an objective way that allows intended users to understand the work done as the basis for the practitioner’s conclusion(s). In most cases, this will not involve detailing the entire work plan, but on the other hand it is important for it not to be so summarized as to be ambiguous, nor written in a way that is overstated or embellished. (Ref: par. (Ref: par. 9.59i)</p>
<p><i>j.</i> The practitioner’s conclusion(s) about whether the subject matter is in accordance with [or based on] the criteria, in all material respects (Ref: par.9.A90 -9.A92)</p> <p>The conclusion(s) should be phrased using appropriate language for the underlying subject matter and applicable criteria given the engagement circumstances.</p>	<p>9.A90 The language of the practitioner’s conclusion(s) in paragraph 9.59j may need to be tailored to reflect the nature of the subject matter and criteria for the engagement. Examples of language that meet the requirements in paragraph 9.59j include the following:</p> <ul style="list-style-type: none"> • In our opinion, the subject matter is presented in accordance with [or based on] the criteria, in all material respects. • Based on our direct examination, we believe that the subject matter achieved the objectives, in all material respects (when the objectives are the criteria). • It is our conclusion that the subject matter is presented fairly, in all material respects, based on the criteria. (The practitioner’s professional judgment concerning the fairness of the presentation of the subject matter relates to whether the measurement, recognition, presentation, and disclosure of all material items in the presentation of the subject matter achieve fair presentation.)

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	<p>(Ref: par. 9.59j)</p> <p>9.A91 A single report may cover more than one aspect of subject matter. When that is the case, the practitioner’s report may contain separate conclusions on each aspect of the subject matter. (Ref: par. 9.59j)</p> <p>9.A92 A practitioner may report on subject matter at multiple dates or covering multiple periods during which criteria have changed (for example, a report on comparative information). Criteria are clearly described when they identify the criteria for each period and how the criteria have changed from one period to the next. If the criteria for the current date or period have changed from the criteria for a preceding date or period, changes in the criteria may be significant to users of the report. If so, the criteria and the fact that they have changed may be disclosed in the presentation of the subject matter, or in the practitioner’s report, even if the subject matter for the preceding date or period is not presented. (Ref: par. 9.59j)</p>
<p><i>k.</i> The manual or printed signature of the practitioner’s firm</p> <p><i>l.</i> The city and state where the practitioner practices (Ref: par. 9.A93)</p> <p><i>m.</i> The date of the report (The report should be dated no earlier than the date on which the practitioner has obtained sufficient appropriate evidence on which to base the practitioner’s conclusion(s), including evidence that</p> <ul style="list-style-type: none"> <i>i.</i> the attestation documentation has been reviewed, and <i>ii.</i> if applicable, the written presentation of the subject matter has been prepared.) <p>(Ref: par. 9.A94–9.A95)</p>	<p>9.A93 In the United States, the location of the issuing office is the city and state. In another country, it may be the city and country. (Ref: par. 9.59l)</p> <p>9.A94 Including the date of the direct examination report informs the intended users that the practitioner has considered the effect on the subject matter and on the direct examination report of events that occurred up to that date. (Ref: par. 9.59m)</p> <p>9.A95 Because the practitioner expresses a conclusion(s) on the subject matter, and the subject matter is the responsibility of the responsible party, the practitioner is not in a position to conclude that sufficient appropriate evidence has been obtained until evidence is obtained that all of the elements that the subject matter comprises, including any related notes, when applicable, have been prepared, and the responsible party has accepted responsibility for them. (Ref: par. 9.59m)</p>
<p>Reference to the Practitioner’s Expert in the Direct Examination Report</p> <p>9.60 If the practitioner refers to the work of a practitioner’s specialist in the report, the wording of that report should not imply that the practitioner’s</p>	<p>Reference to the Practitioner’s Expert in the Direct Examination Report</p> <p>9.A96 The practitioner has sole responsibility for the conclusion(s) expressed, and that responsibility is not reduced by the practitioner’s use of the work of a</p>

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<p>responsibility for the findings and conclusion(s) expressed in that report are reduced because of the involvement of that specialist. (Ref: par. 0–9.A97)</p> <p>Assurance Report Prescribed by Law or Regulation 9.61 If the practitioner is required by law or regulation to use a specific layout or wording of the report, the direct examination report should, at a minimum include each of the elements identified in paragraph 9.59.</p>	<p>practitioner’s specialist. It is important therefore that if the report refers to a practitioner’s specialist, that the wording of that report does not imply that the practitioner’s responsibility for the conclusion(s) expressed is reduced because of the involvement of that specialist. (Ref: par. 9.60)</p> <p>9.A97 A generic reference in a long form report to the engagement having been conducted by suitably qualified personnel including subject matter specialists and attestation specialists is unlikely to be misunderstood as reduced responsibility. The potential for misunderstanding is higher, however, in the case of short form reports, where minimum contextual information is able to be presented, or when the practitioner’s specialist is referred to by name. Therefore, additional wording may be needed in such cases to prevent the report implying that the practitioner’s responsibility for the conclusion(s) expressed is reduced because of the involvement of the specialist. (Ref: par. 9.60)</p>
<p><i>Restricted-Use Paragraph</i></p> <p>9.62 In the following circumstances, the practitioner’s report should include an alert, in a separate paragraph, that restricts the use of the report:</p> <ul style="list-style-type: none"> a. The practitioner determines that the criteria used to evaluate the subject matter are appropriate only for a limited number of parties who either participated in their establishment or can be presumed to have an adequate understanding of the criteria. b. The criteria used to evaluate the subject <p>(Ref: par. 9.A98–9.A100)</p>	<p><i>Restricted-Use Paragraph</i></p> <p>9.A98 Reports on direct examination engagements for which the conditions in paragraph 9.62 do not apply need not include an alert that restricts their use. However, nothing in the attestation standards precludes a practitioner from including such an alert in any direct examination report or other practitioner’s written communication. (Ref: par. 9.62)</p> <p>9.A99 A practitioner’s report that is required by paragraph 9.62 to include an alert that restricts the use of the report may be included in a document that also contains a practitioner’s report that is for general use. In such circumstances, the use of the general use report is not affected. (Ref: par. 9.62)</p> <p>9.A100 A practitioner may also issue a single combined report that includes (a) reports that are required by paragraph 9.62 to include an alert that restricts their use, and (b) reports that are for general use. If these two types of reports are clearly differentiated within the combined report, such as through the use of appropriate headings, the alert that restricts the use of the practitioner’s</p>

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<p>9.63 The alert should</p> <ul style="list-style-type: none"> a. state that the report is intended solely for the information and use of the specified parties, b. identify the specified parties for whom use is intended, and (Ref: par. 9.A101) c. state that the practitioner’s report is not intended to be and should not be used by anyone other than the specified parties. (Ref: par. 9.A102–9.A104) <p>9.64 When the engagement is also performed in accordance with <i>Government Auditing Standards</i>, the alert that restricts the use of the report should include the following information rather than the information required by paragraph 9.63</p> <ul style="list-style-type: none"> a. A description of the purpose of the practitioner’s report, and b. A statement that the practitioner’s report is not suitable for any other purpose. 	<p>report may be limited to the report required by paragraph 9.62 to include such an alert. In such circumstances, the use of the general use report is not affected. (Ref: par. 9.62)</p> <p>9.A101 The practitioner may identify the specified parties by naming them, referring to a list of those parties, or identifying the class of parties, for example, “all customers of XYZ Company during some or all of the period January 1, 20XX to December 31, 20XX.” The method of identifying the specified parties is determined by the practitioner. (Ref: par. 9.63b)</p> <p>9.A102 In some cases the criteria used to measure or evaluate the subject matter may be designed for a specific purpose. For example, a regulator may require certain entities to use particular criteria designed for regulatory purposes. To avoid misunderstandings, the practitioner alerts report users to this fact and that, therefore, the report is intended solely for the information and use of the specified parties. (Ref: par. 9.63c)</p> <p>9.A103 The alert that restricts the use of the practitioner’s written report is designed to avoid misunderstandings related to the use of the practitioner’s written report, particularly if the practitioner’s written report is taken out of the context in which the practitioner’s written report is intended to be used. A practitioner may consider informing the responsible party and, if different, the engaging party or other specified parties that the practitioner’s written report is not intended for distribution to parties other than those specified in the practitioner’s written report. The practitioner may, in connection with establishing the terms of the engagement, reach an understanding with the responsible party or, if different, the engaging party that the intended use of the practitioner’s written report will be restricted and may obtain the responsible party’s agreement that the responsible party and specified parties will not distribute such practitioner’s report to parties other than those identified therein. A practitioner is not responsible for controlling, and cannot control, distribution of the practitioner’s report after its release. (Ref: par. 9.63c)</p> <p>9.A104 In some cases restricted-use reports filed with regulatory agencies are required by law or regulation to be made available to the public as a matter of public record. Also, a regulatory agency as part of its oversight responsibility for an entity may require access to restricted-use reports in</p>

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	which they are not named as a specified party. (Ref: par. 9.63c)
<p>Modified Conclusions 9.65 The practitioner should modify the conclusion(s) when either of the following circumstances exist and, in the practitioner’s professional judgment, the effect of the matter is or may be material:</p> <ul style="list-style-type: none"> a. The practitioner is unable to obtain sufficient appropriate evidence to conclude that the subject matter is in accordance with [or based on] the criteria, in all material respects. b. The practitioner concludes, based on evidence obtained, that the subject matter is not in accordance with [or based on] the criteria, in all material respects. <p>(Ref: par. 9.A105–9.A106)</p> <p>9.66 When the practitioner modifies the conclusion(s), the practitioner should include a separate paragraph in the practitioner’s report that provides a description of the matter(s) giving rise to the modification. (Ref: par. 9.A106)</p>	<p>Modified Conclusions 9.A105 The three types of modified conclusions are: a qualified, adverse, and a disclaimer of conclusion. The decision regarding which type of modified conclusion is appropriate depends upon the following:</p> <ul style="list-style-type: none"> a. The nature of the matter giving rise to the modification (that is, whether the subject matter is in accordance with [or based on] the criteria, in all material respects or, in the case of an inability to obtain sufficient appropriate evidence, may be materially misstated) b. The practitioner’s professional judgment about the pervasiveness of the effects or possible effects of the matter on the subject matter of the engagement. <p>(Ref: par. 9.65)</p> <p>9.A106 A practitioner may issue an unmodified conclusion(s) only when the engagement has been conducted in accordance with the attestation standards. Such standards will not have been complied with if the practitioner has been unable to apply all the procedures that the practitioner considers necessary in the circumstances. (Ref: par. 9.65a)</p>
<p>9.67 The practitioner should express a qualified conclusion(s) when</p> <ul style="list-style-type: none"> a. the practitioner, having obtained sufficient appropriate evidence, concludes that misstatements (or deviations), individually or in the aggregate, are material, but not pervasive to the subject matter ; or b. the practitioner is unable to obtain sufficient appropriate evidence on which to base the conclusion(s), but the practitioner concludes that the possible effects on the subject matter of undetected misstatements (or deviations), if any, could be material, but not pervasive. <p>(Ref: par. 9.A107–9.A110)</p>	<p>9.A107 The term <i>pervasive</i> describes the effects on the subject matter of misstatements (or deviations) or the possible effects on the subject matter of misstatements (or deviations), if any, that are undetected due to an inability to obtain sufficient appropriate evidence. Pervasive effects on the subject matter are those that, in the practitioner’s professional judgment</p> <ul style="list-style-type: none"> a. are not confined to specific aspects of the subject matter; b. if so confined, represent or could represent a substantial proportion of the subject matter or c. in relation to disclosures, are fundamental to the intended users’ understanding of the subject matter. <p>(Ref: par. 9.67)</p>

Requirements	Application and Other Explanatory Material												
	<p>9.A108 The following table illustrates how the practitioner’s professional judgment about the nature of the matter giving rise to the modification and the pervasiveness of its effects or possible effects on the subject matter affects the type of report to be issued.</p> <table border="1" data-bbox="1119 358 1986 932"> <thead> <tr> <th data-bbox="1119 358 1339 500">Nature of Matter Giving Rise to the Modification</th> <th colspan="2" data-bbox="1339 358 1986 500">Practitioner’s Professional Judgment About the Pervasiveness of the Effects or Possible Effects on the Subject Matter</th> </tr> <tr> <td data-bbox="1119 500 1339 578"></td> <th data-bbox="1339 500 1549 578"><i>Material but Not Pervasive</i></th> <th data-bbox="1549 500 1986 578"><i>Material and Pervasive</i></th> </tr> </thead> <tbody> <tr> <td data-bbox="1119 578 1339 824">Scope limitation. An inability to obtain sufficient appropriate evidence.</td> <td data-bbox="1339 578 1549 824">Qualified conclusion</td> <td data-bbox="1549 578 1986 824">Disclaimer of conclusion</td> </tr> <tr> <td data-bbox="1119 824 1339 932">Subject matter is materially misstated.</td> <td data-bbox="1339 824 1549 932">Qualified conclusion</td> <td data-bbox="1549 824 1986 932">Adverse conclusion</td> </tr> </tbody> </table> <p>(Ref: par. 9.67)</p> <p>9.A109 A scope limitation may arise from the following:</p> <ol style="list-style-type: none"> a. Circumstances beyond the control of the appropriate party(ies). For example, documentation that the practitioner considers necessary to inspect may have been accidentally destroyed. b. Circumstances relating to the nature or timing of the practitioner’s work. For example, a physical process that the practitioner considers necessary to observe may have occurred before the practitioner’s engagement. c. Limitations imposed by the responsible party or the engaging party on the practitioner that, for example, may prevent the practitioner from performing a procedure that the practitioner considers necessary in the 	Nature of Matter Giving Rise to the Modification	Practitioner’s Professional Judgment About the Pervasiveness of the Effects or Possible Effects on the Subject Matter			<i>Material but Not Pervasive</i>	<i>Material and Pervasive</i>	Scope limitation. An inability to obtain sufficient appropriate evidence.	Qualified conclusion	Disclaimer of conclusion	Subject matter is materially misstated.	Qualified conclusion	Adverse conclusion
Nature of Matter Giving Rise to the Modification	Practitioner’s Professional Judgment About the Pervasiveness of the Effects or Possible Effects on the Subject Matter												
	<i>Material but Not Pervasive</i>	<i>Material and Pervasive</i>											
Scope limitation. An inability to obtain sufficient appropriate evidence.	Qualified conclusion	Disclaimer of conclusion											
Subject matter is materially misstated.	Qualified conclusion	Adverse conclusion											

Requirements	Application and Other Explanatory Material
<p>9.68 When the practitioner expresses a qualified conclusion(s) due to a material misstatement of the subject matter , the practitioner should state that, except for the effects of the matter(s) giving rise to the modification, the subject matter is presented in accordance with [or based on] the criteria, in all material respects. When the modification arises from an inability to obtain sufficient appropriate evidence, the practitioner should use the corresponding phrase "except for the possible effects of the matter(s) ..." for the modified conclusion(s).</p> <p>9.69 The practitioner should express an adverse conclusion(s) when the practitioner, having obtained sufficient appropriate evidence, concludes that misstatements (or deviations), individually or in the aggregate, are both material and pervasive to the subject matter.</p> <p>9.70 When the practitioner expresses an adverse conclusion(s), the practitioner should state that, because of the significance of the matter(s) giving rise to the modification, the subject matter is not presented in accordance with [or based on] the criteria, in all material respects.</p> <p>9.71 The practitioner should disclaim a conclusion when the practitioner is unable to obtain sufficient appropriate evidence on which to base the conclusion(s), and the practitioner concludes that the possible effects on the subject matter of undetected misstatements (or deviations), if any, could be both material and pervasive. (Ref: par. 9.A110)</p>	<p>circumstances. Limitations of this kind may have other implications for the engagement, such as for the practitioner’s consideration of risks of material misstatement and engagement acceptance and continuance.</p> <p>(Ref: par. 9.67)</p> <p>9.A110 The practitioner’s decision to provide a qualified conclusion, disclaim a conclusion, or withdraw from the engagement because of a scope limitation depends on an assessment of the effect of the omitted procedure(s) on the practitioner’s ability to express a conclusion. This assessment will be affected by the nature and magnitude of the potential effects of the matters in question, and by their significance to the subject matter. (Ref: par. 9.67 and 9.71)</p>

Requirements	Application and Other Explanatory Material
<p>9.72 When the practitioner disclaims a conclusion due to an inability to obtain sufficient appropriate evidence, the practitioner’s report should state that</p> <ul style="list-style-type: none"> a. because of the significance of the matter(s) giving rise to the modification, the practitioner has not been able to obtain sufficient appropriate evidence to provide a basis for a direct examination conclusion(s) and b. accordingly, the practitioner does not express a conclusion on the subject matter. <p><i>Description of the Practitioner’s Responsibility When the Practitioner Expresses a Qualified or an Adverse Conclusion(s)</i></p> <p>9.73 When the practitioner expresses a qualified or an adverse conclusion, the practitioner should amend the description of the practitioner’s responsibility to state that the practitioner believes that the evidence the practitioner has obtained is sufficient and appropriate to provide a basis for the practitioner’s modified direct examination conclusion(s).</p> <p><i>Description of the Practitioner’s Responsibility When the Practitioner Disclaims a Conclusion</i></p> <p>9.74 When the practitioner disclaims a conclusion due to an inability to obtain sufficient appropriate evidence, the practitioner should amend the practitioner’s report to state that the practitioner was engaged to examine the subject matter. The practitioner should also amend the description of the practitioner’s responsibility and the description of a direct examination to state only the following: "Our responsibility is to provide a conclusion(s) on the subject matter based on conducting the direct examination in accordance with attestation standards established by the American Institute of Certified Public Accountants." "Because of the limitation on the scope of our direct examination discussed in the preceding paragraph, the scope of our work was not sufficient to enable us to provide a conclusion(s) on whether the subject matter referred to above is in accordance with [or based on] the criteria, in all material respects."</p>	
<p>9.75 If the practitioner provides a modified conclusion(s) because of a scope limitation but is also aware of a matter(s) that causes the subject matter to be</p>	<p>9.A111 An inability to perform a specific procedure does not constitute a scope limitation if the practitioner is able to obtain sufficient appropriate evidence by performing alternative procedures. (Ref: par. 9.75)</p>

Requirements	Application and Other Explanatory Material
<p>materially misstated, the practitioner should include in the report a clear description of both the scope limitation and the matter(s) that causes the subject matter to be materially misstated. (Ref: par. 9.A111)</p> <p>9.76 The practitioner’s conclusion(s) on the subject matter should be clearly separated from any paragraphs emphasizing matters related to the subject matter or any other reporting responsibilities.</p> <p>9.77 When the direct examination conclusion(s) is (are) modified, reference to an external specialist is permitted when such reference is relevant to an understanding of the modification to the practitioner’s conclusion(s). The practitioner should indicate in the practitioner’s report that such reference does not reduce the practitioner’s responsibility for that (those) conclusion(s).</p>	
<p>Communication Responsibilities</p> <p>9.78 The practitioner should communicate to the responsible party fraud, suspected fraud, noncompliance with laws or regulations, uncorrected misstatements (or deviations), and when relevant to the subject matter, internal control deficiencies identified during the engagement. When the engaging party is not the responsible party, the practitioner should also communicate this information to the engaging party. (Ref: par. 9.A112)</p> <p>9.79 If the practitioner has identified or suspects noncompliance with laws or regulations that are not relevant to the subject matter, the practitioner should determine whether the practitioner has a responsibility to report the identified or suspected noncompliance to parties other than the responsible party and the engaging party (if different). (Ref: par. 9.A113–9.A114)</p>	<p>Communication Responsibilities</p> <p>9.A112 Other matters that may be appropriate to communicate to the responsible party or, if different, the engaging party, include bias in the measurement, evaluation, or disclosure of the subject matter. (Ref: par. 9.78)</p> <p>9.A113 The practitioner’s professional duty to maintain the confidentiality of client information may preclude the practitioner from reporting identified or suspected noncompliance with laws or regulations that is not relevant to the subject matter to a party other than the responsible party and, if different, the engaging party. However, the practitioner’s legal responsibilities may vary by jurisdiction, and in certain circumstances, the duty of confidentiality may be overridden by statute, the law, or courts of law. In the following circumstances, a duty to notify parties outside the entity may exist:</p> <ul style="list-style-type: none"> • In response to a court order • In compliance with requirements for direct examinations of entities that receive financial assistance from a government agency <p>Because potential conflicts with the practitioner’s ethical and legal obligations for confidentiality may be complex, the practitioner may consult with legal counsel before discussing noncompliance with parties outside the entity. (Ref: par. 9.79)</p>

Requirements	Application and Other Explanatory Material
<p>Documentation 9.80 The practitioner should prepare engagement documentation that is sufficient to determine</p> <ul style="list-style-type: none"> a. the nature, timing, and extent of the procedures performed to comply with relevant chapters of the attestation standards and applicable legal and regulatory requirements, including <ul style="list-style-type: none"> i. the identifying characteristics of the specific items or matters tested; ii. who performed the engagement work and the date such work was completed; iii. the discussions with the responsible party or others about findings or issues that, in the practitioner’s professional judgment, are significant, including the nature of the significant findings or issues discussed, and when and with whom the discussions took place; iv. when the engaging party is the responsible party and the responsible party will not provide one or more of the requested written representations or the practitioner concludes that there is sufficient doubt about the competence, integrity, ethical values, or diligence of those providing the written representations; or that the written representations are otherwise not reliable, the matters in paragraph 9.54; vi. who reviewed the engagement work performed and the date and extent of such review. b. the results of the procedures performed and the evidence obtained. <p>(Ref: par. 9.A115–9.A118)</p>	<p>9.A114 If the practitioner is performing an examination engagement in accordance with <i>Government Auditing Standards</i> the practitioner may be required to report on compliance with laws, regulations, and provisions of contracts or grant agreements as part of the examination. The practitioner also may be required to communicate instances of noncompliance to appropriate oversight bodies and funding agencies. (Ref: par. 9.79)</p> <p>Documentation 9.A115 Documentation includes a record of the practitioner’s reasoning on all significant findings or issues that require the exercise of professional judgment and related conclusions. The existence of difficult questions of principle or professional judgment calls for the documentation to include the relevant facts that were known by the practitioner at the time the conclusion(s) was (were) reached. (Ref: par. 9.80)</p> <p>9.A116 It is neither necessary nor practical to document every matter considered, or professional judgment made, during an engagement. Further, it is unnecessary for the practitioner to document separately (as in a checklist, for example) compliance with matters for which compliance is demonstrated by documents included in the engagement file. Similarly, the practitioner need not include in the engagement file superseded drafts of working papers, notes that reflect incomplete or preliminary thinking, previous copies of documents corrected for typographical or other errors, and duplicates of documents. (Ref: par. 9.80)</p> <p>9.A117 In applying professional judgment to assess the extent of documentation to be prepared and retained, the practitioner may consider what is necessary to provide an experienced practitioner, having no previous connection with the engagement, with an understanding of the work performed and the basis of the principal decisions made. (Ref: par. 9.80)</p> <p>9.A118 Documentation ordinarily includes a record of</p> <ul style="list-style-type: none"> • issues identified with respect to compliance with relevant ethical requirements and how they were resolved. • conclusions on compliance with independence requirements that apply to the engagement and any relevant discussions with the firm that support these conclusions.

Requirements	Application and Other Explanatory Material
	<ul style="list-style-type: none"> • conclusions reached regarding the acceptance and continuance of client relationships and attestation engagements. • the nature and scope of, and conclusions resulting from, consultations undertaken during the course of the engagement. <p>(Ref: par. 9.80)</p>
<p>9.81 If the practitioner identified information that is inconsistent with the practitioner’s final conclusion(s) regarding a significant finding or issue, the practitioner should document how the practitioner addressed the inconsistency.</p>	
<p>9.82 If, in circumstances such as those described in paragraph 9.46 Error! eference source not found., the practitioner performs new or additional procedures or draws new conclusions after the date of the practitioner’s report, the practitioner should document</p> <ol style="list-style-type: none"> a. the circumstances encountered; b. the new or additional procedures performed, evidence obtained, and conclusions reached and their effect on the practitioner’s report; and c. when and by whom the resulting changes to the documentation were made and reviewed. 	

9.A119

Exhibit—Illustrative Examination Reports

The illustrative examination reports in this exhibit meet the applicable reporting requirements in paragraphs 9.58–9.77. A practitioner may use alternative language in drafting an examination report, provided that the language meets the applicable requirements in paragraphs 9.58–9.77. The criteria for evaluating the subject matter in examples X and X have been determined by the practitioner to be suitable and available to all report users; therefore, these reports may be for general use. The criteria for evaluating the subject matter in example 4 are suitable but available only to specified parties; therefore, use of this report is restricted to the specified parties who either participated in the establishment of the criteria, or can be presumed to have an adequate understanding of the criteria. (See paragraph 9.63 for the information to be included in a separate report paragraph that contains an alert that restricts the use of the report and paragraph 9.64 for the contents of that paragraph when the engagement is also performed in accordance with *Government Auditing Standards*.)

Example 1—Examination Report on Subject Matter; Unmodified Conclusion

To the owners of Grocery Store A

We were engaged by Grocery store A to perform a direct examination on a sample basket of goods. Our engagement entailed measuring the cost of a predetermined basket of goods at grocery stores A, B and C. The cost was measured in U.S. dollars without any coupons or promotional discounts. Each grocery store is responsible for their own prices. Our responsibility is to provide a conclusion on which store had the lowest cost.

Our examination was conducted in accordance with the direct examination attestation standards established by the American Institute of Certified Public Accountants. Those standards require that we plan and perform the examination to obtain reasonable assurance about which store had the lowest cost for the sample basket of goods at a particular date and time. A direct examination involves performing procedures that we selected. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risks of material misstatement of the costs. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our conclusion.

Exhibit A sets forth the basket of goods and the specific stores that we agreed to use for our engagement. Under the terms of our engagement, we determined the date and time to price the basket of goods. That date and time was confidential to our engagement teams and was not made known to any of the stores or management in advance. We selected these stores because they are in the same neighborhood and we believe provide comparable competition in the same vicinity. Our engagement teams entered the three grocery stores at 9:00 a.m. on July 24th. Each engagement team purchased the same basket of goods, making sure that we purchased the exact same brands as set forth in the sample basket. We found that grocery store B did not have the exact brand of oranges that are in the sample basket of goods, therefore, that item was deleted from the cost of each store. We make no representations as to whether this sample basket of goods represents the food and household items that might normally be purchased by an individual or family. We also make no representations as to whether this same outcome would occur in a different vicinity or location. Finally, it should be noted that all three stores had their own store brands for many of these items and generally, those store brands, in all three stores, were less expensive than the items in the sample basket of goods.

Based on the evidence obtained from our direct examination engagement, it is our opinion that grocery store A had the lowest cost for the sample basket of goods as of the date and time set forth above.

[Practitioner's signature]

[Practitioner's city and state]

[Date of practitioner's report]

Independent Practitioner's Report

To the audit committee of Nonprofit XYZ

We were engaged to perform a direct examination engagement as to whether Nonprofit XYZ was in compliance with ABC's Contract as of and for the period ended June 30, 2015. Our engagement entailed examining the provisions of the contract and determining XYZ's compliance, in all material respects, with those provisions. Nonprofit XYZ is responsible for complying with the contract provisions, our responsibility is to provide a conclusion on XYZ's compliance.

Our examination was conducted in accordance with the direct examination attestation standards established by the American Institute of Certified Public Accountants. Those standards require that we plan and perform the examination to obtain reasonable assurance as to XYZ's compliance. A direct examination involves examining, on a test basis, evidence about XYZ's compliance and performing other procedures that as we considered necessary in the circumstances. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risks of material noncompliance, whether caused by error or fraud. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our findings and conclusion.

ABC's contract, which serves as the criteria for this direct examination, was signed by Nonprofit XYZ on November 15, 2014. The contract provided significant funding to XYZ in the amount of \$2,000,000. Under the terms of the contract, XYZ is required to have a compliance examination performed annually and the report provided to the management of ABC. The performance compliance provisions of the contract are set forth in section III of the contract and contain five

major provisions. In planning our engagement, we assessed the risk of material noncompliance. In performing those risk assessment procedures we noted that management has not been monitoring compliance with the contract and therefore was unable to provide us an assertion as to whether they thought XYZ was in compliance. This failure to monitor compliance is, in our view, a material weakness in XYZ's internal control over compliance. As a result, we have made recommendations to management on how they might remediate this weakness. Other control deficiencies have also been communicated separately to management and the audit committee, but none of those deficiencies were determined to be material weaknesses.

With respect to the five contract provisions, a summary of our key procedures and our finding are set forth below:

[provide the key procedures performed and the findings for each of the five provisions]

As described above, our examination disclosed that XYZ has not complied, in all material respects, with provision 2 of section III of the contract. Except for this noncompliance, we have concluded that XYZ complied, in all material respects, with section III of the contract as of and for the period ended June 30, 2015.

While not affecting our conclusions, we do want to report that we believe the language in provision 5 is confusing and subject to interpretation. As a result, we discussed this with ABC who provided us with additional written clarification as to the intent of the contract. We understand that ABC is amending the contract to make this provision clearer.

This report is intended solely for the information and use of the managements of XYZ and ABC and is not intended to be and should not be used by anyone other these specified parties.

[Practitioner's signature]

[Practitioner's city and state]

[Date of practitioner's report]