



*Statement on
Standards for Attestation
Engagements*

September 2020
21

Issued by the Auditing Standards Board

Direct Examination Engagements

(AICPA, Professional Standards, AT-C sec. 206;

- *Supersedes Statement on Standards for Attestation Engagements [SSAE] No. 18, Attestation Standards: Clarification and Recodification, as amended, AT-C section 205, Examination Engagements;*
- *Amends SSAE No. 18, as amended, AT-C section 105, Concepts Common to All Attestation Engagements)*

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¹ All ET sections can be found in AICPA *Professional Standards*.

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Statement on Standards for Attestation Engagements, *Direct Examination Engagements*

Boldface italics denote new language. Deleted text is in ~~strikethrough~~.

Amendment to SSAE No. 18, *Attestation Standards: Clarification and Recodification*, as Amended, AT-C Section 105, *Concepts Common to All Attestation Engagements* (AICPA, *Professional Standards*, AT-C sec. 105)

1. This amendment is effective for practitioners' reports dated on or after June 15, 2022.

AT-C Section 105, *Concepts Common to All Attestation Engagements*

Introduction

.01 This section applies to engagements in which a CPA in the practice of public accounting is engaged to issue, or does issue, a practitioner's

- *assertion-based examination report in accordance with AT-C section 205, Assertion-Based Examination Engagements,*
- *direct examination report in accordance with AT-C section 206, Direct Examination Engagements,*
- review *report in accordance with AT-C section 210, Review Engagements,* or
- agreed-upon procedures report *in accordance with AT-C section 215, Agreed-Upon Procedures Engagements.*

~~on subject matter or an assertion about subject matter (hereinafter referred to as an assertion)~~*In this section, when the term examination is used, it is inclusive of both assertion-based and direct examination engagements.*

In all attestation engagements, the underlying subject matter that is the responsibility of another a party other than the practitioner. (Ref: par. .A1)

Examination and Review Engagements

.02 *Examination and review engagements include the following:*

- a. *Assertion-based examination engagements, in which a party other than the practitioner measures or evaluates the underlying subject matter against the criteria and provides an assertion about the outcome of the measurement or evaluation, and the practitioner expresses an opinion in a written report about whether the underlying subject matter is in accordance with (or based on) the criteria, in all material respects, or the responsible party's assertion is fairly stated, in all material respects.*
- b. *Direct examination engagements, in which the practitioner measures or evaluates the underlying subject matter against the criteria and performs other procedures to obtain sufficient appropriate evidence to express an opinion in a written report that conveys the results of that measurement or evaluation. The responsible party does not provide an assertion about the results of the measurement or evaluation of the underlying subject matter against the criteria.*
- c. *Review engagements, in which a party other than the practitioner measures or evaluates the underlying subject matter against the criteria and provides an assertion about the outcome of the measurement or evaluation, and the practitioner expresses a conclusion in a written report about whether the practitioner is aware of any material modifications that should be made to the subject matter in order for it to be in accordance with (or based on) the criteria or the responsible party's assertion in order for it to be fairly stated.*

.03 The practitioner's objective in both an assertion-based examination engagement and a direct examination engagement is to obtain reasonable assurance. AT-C section 205 contains requirements and application material for assertion-based examination engagements. AT-C section 206 contains requirements and application material for direct examination engagements.

~~.02~~ *.04 An assertion-based examination engagement ~~or~~ and a review engagement are* is predicated on the concept that a party other than the practitioner makes an assertion about whether the **underlying** subject matter is measured or evaluated in accordance with suitable criteria. Section 205, ~~Examination Engagements~~, and section 210, ~~Review Engagements~~, require the practitioner to request such an assertion in writing when performing an **assertion-based** examination **engagement** or **a** review engagement.¹ In **assertion-based** examination **engagements** and review engagements, when the engaging party is the responsible party, the responsible party's refusal to provide a written assertion requires the practitioner to withdraw from the engagement when withdrawal is possible under applicable laws and regulations.² In **assertion-based** examination **engagements** and review engagements, when the engaging party is not the responsible party and the responsible party refuses to provide a written assertion, the practitioner need not withdraw from the engagement but is required to disclose that refusal in the practitioner's report and restrict the use of the report to the engaging party.³ The purpose of an ~~attestation~~ examination or review engagement is to provide users of information with an opinion or conclusion regarding **the underlying** subject matter ~~or an~~

¹ Paragraph .10 of section 205, **Assertion-Based Examination Engagements**, and paragraph .11 of section 210, **Review Engagements**.

² Paragraph ~~.84.82~~ of section 205 and paragraph .59 of section 210.

³ Paragraph ~~.86.84~~ of section 205 and paragraph .60 of section 210.

assertion about the subject matter, as measured *or evaluated* against suitable and available criteria. An examination engagement results in an opinion, and a review engagement results in a conclusion. The purpose of an agreed-upon procedures engagement is to provide users of information with the results of procedures performed by the practitioner on *underlying* subject matter *or subject matter information*. An agreed-upon procedures engagement results in findings.

[Paragraphs .03–.08 are renumbered to paragraphs .05–.10. The content is unchanged.]

Objectives

~~.09~~ **.11** In conducting an attestation engagement, the overall objectives of the practitioner are as follows:

- a. Apply the requirements relevant to the attestation engagement.
- b. **Report on the underlying subject matter or subject matter information (or assertion) and communicate as required by the applicable AT-C section, in accordance with the results of the practitioner's procedures**
- ~~b.~~ ~~In an examination or review engagement, report on the subject matter or assertion, and in an agreed-upon procedures engagement, report on the procedures performed and related findings without providing an opinion or conclusion on the subject matter.~~
- ~~c.~~ ~~Communicate as required by the applicable AT-C section, in accordance with the results of the practitioner's procedures.~~
- ~~dc.~~ Implement quality control procedures at the engagement level that provide the practitioner with reasonable assurance that the attestation engagement complies with professional standards and applicable legal and regulatory requirements

Definitions

~~.10~~ **.12** For purposes of the attestation standards, the following terms have the meanings attributed as follows:

Assertion. Any declaration or set of declarations about whether the *underlying* subject matter *or subject matter information* is in accordance with (or based on) the criteria. **An assertion is subject matter information.**

Attestation engagement. An ~~examination, review, or agreed-upon procedures~~ engagement performed under the attestation standards ~~related to subject matter or an assertion that is the responsibility of another party~~. The following are the ~~four~~ **three** types of attestation engagements:

- a. **Assertion-based Examination engagement.** An attestation engagement in which the practitioner obtains reasonable assurance by obtaining sufficient appropriate evidence about the *responsible party's* measurement or evaluation of *the underlying* subject matter against criteria in order to be able to draw reasonable conclusions on which to base the practitioner's opinion about whether the subject

matter is in accordance with (or based on) the criteria or the *responsible party's* assertion is fairly stated, in all material respects. (Ref: par. .A7)

b. Direct examination engagement. *An attestation engagement in which the practitioner obtains reasonable assurance by measuring or evaluating the underlying subject matter against the criteria and performing other procedures to obtain sufficient appropriate evidence to express an opinion that conveys the results of that measurement or evaluation. In a direct examination engagement, the responsible party does not provide an assertion. (Ref: par. .A7)*

cb. Review engagement. An attestation engagement in which the practitioner obtains limited assurance by obtaining sufficient appropriate review evidence about the *responsible party's* measurement or evaluation of *underlying* subject matter against criteria in order to express a conclusion about whether any material modification should be made to the subject matter *information* in order for it be in accordance with (or based on) the criteria, or to the *responsible party's* assertion in order for it to be fairly stated. (Ref: par. .A8)

de. Agreed-upon procedures engagement. An attestation engagement in which a practitioner performs specific procedures on *underlying subject matter or subject matter information* and reports the findings without providing an opinion or a conclusion.

Attestation risk. In an examination or review engagement, the risk that the practitioner expresses an inappropriate opinion or conclusion, as applicable, when the subject matter *information* (or assertion) is materially misstated. (Ref: par. .A9–.A15)

Criteria. The benchmarks used to measure or evaluate the *underlying* subject matter. (Ref: par. .A16)

...

Engagement circumstances. The broad context defining the particular engagement, which includes the terms of the engagement; whether it is an examination, review, or agreed-upon procedures engagement; the characteristics of the *underlying* subject matter; the criteria; the information needs of the intended users; relevant characteristics of the responsible party and, if different, the engaging party and their environment; and other matters, for example, events, transactions, conditions and practices, and relevant laws and regulations, that may have a significant effect on the engagement.

...

Engaging party. The party~~(ies)~~ that engages the practitioner to perform the attestation engagement. (Ref: par. .A17)

...

Interpretative publications. Interpretations of the Statements on Standards for Attestation Engagements (SSAEs), exhibits to SSAEs, guidance on attestation engagements included in AICPA audit and accounting guides, and AICPA attestation Statements of Position, to the extent that those statements are applicable to such engagements.

Misstatement. A difference between the measurement or evaluation of the *underlying* subject matter by the responsible party and the *appropriate* proper measurement or evaluation of the *underlying* subject matter *in accordance with* (or based on) the criteria. Misstatements can be intentional or unintentional, qualitative or quantitative, and include omissions. In certain engagements, a misstatement may be referred to as a *deviation, exception, or instance of noncompliance*.

...

Noncompliance with laws or regulations. Acts of omission or commission by the entity, either intentional or unintentional, that are contrary to the prevailing laws or regulations. Such acts include transactions entered into by, or in the name of, the entity or on its behalf by those charged with governance, management, or employees. *Noncompliance* does not include personal misconduct (unrelated to the *underlying* subject matter or *subject matter information*) by those charged with governance, management, or employees of the entity.

Other attestation publications. Publications other than interpretive publications. These include AICPA attestation publications not defined as interpretive publications; attestation articles in the Journal of Accountancy and other professional journals; continuing professional education programs and other instructional materials, textbooks, guidebooks, attestation programs, and checklists; and other attestation publications from state CPA societies, other organizations, and individuals.

...

Responsible party. The party(ies) responsible for the *underlying* subject matter, *which is a party other than the practitioner. In an assertion-based examination or review engagement, if the nature of the underlying subject matter is such that no such party exists, a party who has a reasonable basis for making a written assertion about the underlying subject matter may be deemed to be the responsible party.*

...

Subject matter information. *The outcome of the measurement or evaluation of the underlying subject matter against criteria. An assertion about whether the underlying subject matter is in accordance with the criteria is a form of subject matter information.*

Underlying sSubject matter.* In an examination or review engagement, the phenomenon that is measured or evaluated by applying criteria. In an agreed-upon procedures engagement, the phenomenon upon which procedures are performed.

~~11~~ .13 For the purposes of the attestation standards, references to *appropriate party(ies)* should be read hereafter as the *responsible party* or the *engaging party*, as appropriate. (Ref: par. .A18)

Conduct of an Attestation Engagement in Accordance With the Attestation Standards

Complying With AT-C Sections That Are Relevant to the Engagement

* Prior to the issuance of SSAE No. 21, “the phenomenon that is measured or evaluated by applying criteria” was the definition of subject matter.

~~12~~ **.14** When performing an attestation engagement, the practitioner should comply with

- this section;
- sections 205, **206**, 210, or 215, as applicable; and
- any subject-matter AT-C section relevant to the engagement when the AT-C section is in effect and the circumstances addressed by the AT-C section exist.

[Paragraphs .13–.15 are renumbered to paragraphs .15–.17. The content is unchanged.]

Complying With Relevant Requirements

~~16~~ **.18** Subject to paragraph ~~.22–20~~, the practitioner should comply with each requirement of the AT-C sections that is relevant to the engagement being performed, including any relevant subject-matter AT-C section, unless, in the circumstances of the engagement

- a. the entire AT-C section is not relevant, or
- b. the requirement is not relevant because it is conditional, and the condition does not exist.

[Paragraphs .17–.18 are renumbered to paragraphs .19–.20. The content is unchanged.]

Defining Professional Requirements in the Attestation Standards

~~19~~ **.21** The attestation standards use the following two categories of professional requirements, identified by specific terms, to describe the degree of responsibility it imposes on practitioners:

- *Unconditional requirements*. The practitioner must comply with an unconditional requirement in all cases in which such requirement is relevant. The attestation standards use the word *must* to indicate an unconditional requirement.
- *Presumptively mandatory requirements*. The practitioner must comply with a presumptively mandatory requirement in all cases in which such a requirement is relevant, except in rare circumstances discussed in paragraph ~~.22–20~~. The attestation standards use the word *should* to indicate a presumptively mandatory requirement.

[Paragraphs .20–.23 are renumbered to paragraphs .22–.25. The content is unchanged.]

Preconditions for an Attestation Engagement

~~24~~ **.26** The 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 or assertion~~. (Ref: par. .A34)

~~.25~~ **.27** In order to establish that the preconditions for an attestation engagement are present, the practitioner should, *on the basis of a preliminary knowledge of the engagement circumstances and discussion with the appropriate party*, determine ~~both~~ of the following:

- a. Whether the responsible party is a party other than the practitioner and takes responsibility for the *underlying* subject matter. (Ref: par. .A35–.A37)
- b. Whether the engagement exhibits all of the following characteristics:
 - i. The underlying subject matter is appropriate. (Ref: par. .A38–.A43)
 - ii. In an examination or review engagement, the criteria to be applied in the preparation and evaluation of the *underlying* subject matter are suitable and will be available to the intended users. (Ref: par. .A44–.A54)
 - iii. The practitioner expects to be able to obtain the evidence needed to arrive at the practitioner’s opinion, conclusion, or findings, including (Ref: par. .A55–.A56)
 - (1) access to all information of which the appropriate party is aware that is relevant to the *engagement* measurement, evaluation, or disclosure of the subject matter;
 - (2) access to additional information that the practitioner may request from the appropriate party for the purpose of the engagement; and
 - (3) unrestricted access to persons within the appropriate party from whom the practitioner determines it necessary to obtain evidence.
 - iv. The practitioner’s opinion, conclusion, or findings, in the form appropriate to the engagement, is to be contained in a written practitioner’s report.

~~.26~~ **.28** If the preconditions in paragraphs ~~.26–.27.24–.25~~ are not present, the practitioner should discuss the matter with the engaging party to attempt to resolve the issue.

~~.27~~ **.29** The practitioner should accept an attestation engagement only when the practitioner

- a. has no reason to believe that relevant ethical requirements, including independence, will not be satisfied;
- b. is satisfied that those persons who are to perform the engagement collectively have the appropriate competence and capabilities (see also paragraph ~~.34~~ ~~.32~~);
- c. has determined that the engagement to be performed meets all the preconditions for an attestation engagement (see also paragraphs ~~.26–.27.24–.25~~); and
- d. has reached a common understanding with the engaging party of the terms of the engagement, including the practitioner’s reporting responsibilities.

~~.28~~ **.30** If it is discovered after the engagement has been accepted that one or more of the preconditions for an attestation engagement is not present, the practitioner should discuss the matter with the appropriate party ~~(ies)~~ and should determine

- a. whether the matter can be resolved;
- b. whether it is appropriate to continue with the engagement; and

- c. if the matter cannot be resolved but it is still appropriate to continue with the engagement, whether; ***to communicate the matter in the practitioner's report***, and if ***the matter is to be communicated in the practitioner's report***, so how; ***to do so communicate the matter in the practitioner's report***.

[Paragraphs .29–.31 are renumbered to paragraphs .31–.33. The content is unchanged.]

Quality Control

Assignment of the Engagement Team and the Practitioner's Specialists

.32 .34 The engagement partner should be satisfied that

- a. the engagement team, and any practitioner's external specialists, collectively, have the appropriate competence, including knowledge of the ***underlying*** subject matter ***and criteria***, and capabilities to (Ref: par. .A61–.A63)
 - i. perform the engagement in accordance with professional standards and applicable legal and regulatory requirements and
 - ii. enable the issuance of a practitioner's report that is appropriate in the circumstances.
- b. to an extent that is sufficient to accept responsibility for the opinion, conclusion, or findings on the ***underlying subject matter or*** subject matter ***information*** (or assertion), the engagement team will be able to be involved in the work of
 - i. a practitioner's external specialist when the work of that specialist is to be used and (Ref: par. .A62)
 - ii. an other practitioner, when the work of that practitioner is to be used.
- c. those involved in the engagement have been informed of their responsibilities, including the objectives of the procedures they are to perform and matters that may affect the nature, timing, and extent of such procedures.
- d. engagement team members have been directed to bring to the engagement partner's attention significant questions raised during the engagement so that their significance may be assessed.

[Paragraph .33 is renumbered to paragraph .35. The content is unchanged.]

.36 Throughout the engagement, the engagement partner should remain alert, through observation and making inquiries as necessary, for evidence of noncompliance with relevant ethical requirements by members of the engagement team. If matters come to the engagement partner's attention through the firm's system of quality control or otherwise that indicate that members of the engagement team have not complied with relevant ethical requirements, the engagement partner, in consultation with others in the firm, should determine the appropriate action.

[Paragraphs .34–.41 are renumbered to paragraphs .37–.44. The content is unchanged.]

Engagement Quality Control Review

- ~~.42~~ **.45** For those engagements, if any, for which the firm has determined that an engagement quality control review is required (Ref: par. .A67)
- a. the engagement partner should take responsibility for discussing with the engagement quality control reviewer significant findings or issues arising during the engagement, including those identified during the engagement quality control review, and **should** not release the practitioner's report until completion of the engagement quality control review and
 - b. the engagement quality control reviewer should perform an objective evaluation of the significant judgments made by the engagement team and the conclusions reached in formulating the report. This evaluation should include the following:
 - i. Discussion of significant findings or issues with the engagement partner
 - ii. Reading the written subject matter **information** (or assertion) and the proposed report
 - iii. Reading selected engagement documentation relating to the significant judgments the engagement team made and the related conclusions it reached
 - iv. Evaluation of the **decisions** ~~conclusions~~—reached in formulating the report and consideration of whether the proposed report is appropriate

Professional Skepticism and Professional Judgment

Professional Skepticism

- ~~.43~~ **.46** The practitioner should **maintain** ~~plan and perform an attestation engagement with~~ professional skepticism **while planning and performing an attestation engagement**. (Ref: par. .A68–.A70)

[Paragraphs .44–.45 are renumbered to paragraphs .47–.48. The content is unchanged.]

Application and Other Explanatory Material

Introduction (Ref: par. .01 and ~~.03~~.05)

- ~~.A1~~ The subject matter of An attestation engagement may **address a variety of conditions or events** ~~take many forms~~, including the following:
- a. Historical or prospective performance or condition, for example, historical or prospective financial information, performance measurements, and backlog data
 - b. Physical characteristics, for example, narrative descriptions or square footage of facilities
 - c. Historical events, for example, the price of a market basket of goods on a certain date

- d. Analyses, for example, break-even analyses
- e. Systems and processes, for example, internal control
- f. Behavior, for example, corporate governance, compliance with laws and regulations, and human resource practices
- g. ***Environmental, social, and governance information, for example, greenhouse gas emissions or diversity in employment***

The ***measurement or evaluation of such conditions or events*** subject matter may be as of a point in time or for a period of time.

[No amendment to paragraphs .A2–.A6.]

Definitions

Assertion-Based and Direct ***Examination Engagements*** (Ref: par. ~~.10~~ .12)

.A7 The practitioner obtains the same level of assurance in an ***assertion-based and direct*** examination engagement as the practitioner does in a financial statement audit.

[No amendment to paragraph .A8.]

Attestation Risk (Ref: par. ~~.10~~ .12)

.A9 Attestation risk does not refer to the practitioner’s business risks, such as loss from litigation, adverse publicity, or other events arising in connection with the ***underlying*** subject matter ***or subject matter information*** (or assertion) reported on.

.A10 In general, attestation risk can be represented by the following components, although not all of these components will necessarily be present or significant for all engagements:

- a. Risks that the practitioner does not directly influence, which consist of
 - i. the susceptibility of the subject matter ***information*** to a material misstatement before consideration of any related controls (inherent risk) and
 - ii. the risk that a material misstatement that could occur in the subject matter ***information*** will not be prevented, or detected and corrected, on a timely basis by the appropriate party(ies)’s internal control (control risk)
- b. Risk that the practitioner does directly influence, which consists of the risk that the procedures to be performed by the practitioner will not detect a material misstatement (detection risk)

.A11 The degree to which each of these components of attestation risk is relevant to the engagement is affected by the engagement circumstances, in particular

- the nature of the **underlying** subject matter **or subject matter information** ~~or assertion~~. (For example, the concept of control risk may be more useful when the **underlying** subject matter **or subject matter information** ~~or assertion~~ relates to the preparation of information about an entity's performance than when it relates to information about the existence of a physical condition.)
- the type of engagement being performed. (For example, in a review engagement, the practitioner may often decide to obtain evidence by means other than tests of controls, in which case, consideration of control risk may be less relevant than in an examination engagement on the same subject matter **information** [or assertion].)

[No amendment to paragraph .A12.]

.A13 In an examination engagement, the practitioner reduces attestation risk to an acceptably low level in the circumstances of the engagement as the basis for the practitioner's opinion. Reducing attestation risk to zero is not contemplated in an examination engagement and, therefore, reasonable assurance is less than absolute assurance as a result of factors such as the following:

- The use of selective testing
- The inherent limitations of internal control
- The fact that much of the evidence available to the practitioner is persuasive, rather than conclusive
- The ~~use~~ **exercise** of professional judgment in gathering and evaluating evidence and forming conclusions based on that evidence
- In some cases, the characteristics of the **underlying** subject matter when evaluated or measured against the criteria

[No amendment to paragraph .A14.]

.A15 Attestation risk is not applicable to an agreed-upon procedures engagement because in such engagements, the practitioner performs specific procedures ~~(the design of which is the responsibility of the specified parties)~~ on **underlying subject matter or subject matter information** and reports the findings without providing an opinion or conclusion.

Criteria (Ref: par. ~~A10~~ .12)

.A16 Suitable criteria are required for reasonably consistent measurement or evaluation of **underlying** subject matter within the context of professional judgment. Without the frame of reference provided by suitable criteria, any conclusion is open to individual interpretation and

misunderstanding. The suitability of criteria is context-sensitive, that is, it is determined in the context of the engagement circumstances. Even for the same *underlying* subject matter, there can be different criteria, which will yield a different measurement or evaluation. For example, one responsible party might select the number of customer complaints resolved to the acknowledged satisfaction of the customer for the *underlying* subject matter of customer satisfaction; another responsible party might select the number of repeat purchases in the three months following the initial purchase. The suitability of criteria is not affected by the level of assurance, that is, if criteria are unsuitable for an examination engagement, they are also unsuitable for a review engagement and vice versa.

[No amendment to paragraphs .A17–.A19.]

.A20 Paragraph ~~.14.16~~ does not prohibit combining reports issued by a practitioner under the attestation standards with reports issued under other professional standards.

[No amendment to paragraphs .A21–.A23.]

.A24 The practitioner is required by paragraph ~~.15.17~~ to understand the application and other explanatory material. How the practitioner applies the guidance in the engagement depends on the exercise of professional judgment in the circumstances consistent with the objective of the section. The words *may*, *might*, and *could* are used to describe these actions and procedures.

[No amendment to paragraphs .A25–.A26.]

Complying With Relevant Requirements (Ref: par. ~~.17~~ .19)

.A27 In certain attestation engagements, the practitioner ~~also~~ may *also* be required to comply with other requirements, *such as* in *law or regulation*, *in* addition to the attestation standards. The attestation standards do not override law or regulation that governs the attestation engagement. In the event that such law or regulation differs from attestation standards, an attestation engagement conducted only in accordance with law or regulation will not necessarily comply with the attestation standards.

Practitioner’s Report Prescribed by Law or Regulation (Ref: par. ~~.18~~ .20)

.A28 Some report forms can be made acceptable by inserting additional wording to include the elements required by sections 205, **206**, 210, and 215.⁴ Some report forms required by law or regulation can be made acceptable only by complete revision because the prescribed language of the practitioner’s report calls for statements by the practitioner that are not consistent with the practitioner’s function or responsibility, for example, a report form that requests the practitioner to “certify” the subject matter *information*.

⁴ Paragraphs .63–.66 of section 205, paragraphs .46–.49 of section 210, and paragraph .35 of section 215, **Agreed-Upon Procedures Engagements**.

Departure From a Relevant Requirement (Ref: par. ~~.20~~ .22)

~~.A29~~ Paragraph ~~.41.44~~ prescribes documentation requirements when the circumstances described in paragraph ~~.20.22~~ occur.

Interpretive Publications (Ref: par. ~~.21~~ .23)

~~.A30~~ *Interpretive publications* are not attestation standards. Interpretive publications are recommendations on the application of the attestation standards in specific circumstances, including engagements for entities in specialized industries. An interpretive publication is issued under the authority of the relevant senior technical committee after all members of the committee have been provided an opportunity to consider and comment on whether the proposed interpretive publication is consistent with the attestation standards. ~~Examples of interpretive publications are interpretations of the attestation standards, exhibits to the AT-C sections, and attestation guidance included in AICPA guides and attestation Statements of Position (SOPs). Interpretations of the AT-C sections and exhibits are included within the AT-C sections in AICPA Professional Standards. AICPA guides and attestation SOPs are listed in AT-C appendix A, “AICPA Guides and Statements of Position,” of AICPA Professional Standards.~~

Other Attestation Publications (Ref: par. ~~.22~~ .24)

~~.A31~~ *Other attestation publications* are ~~publications other than interpretive publications. These include AICPA attestation publications not defined as interpretive publications; attestation articles in the *Journal of Accountancy* and other professional journals; continuing professional education programs and other instruction materials, textbooks, guidebooks, attestation programs, and checklists; and other attestation publications from state CPA societies, other organizations, and individuals.~~ Other attestation publications have no authoritative status; however, they may help the practitioner understand and apply the attestation standards. The practitioner is not expected to be aware of the full body of other attestation publications.

~~.A32~~ Although the practitioner determines the relevance of these publications in accordance with paragraph ~~.22.24~~, the practitioner may presume that other attestation publications published by the AICPA that have been reviewed by the AICPA Audit and Attest Standards staff are appropriate. These other attestation publications are listed in AT-C appendix B, “Other Attestation Publications,” of AICPA *Professional Standards*.

[No amendment to paragraph .A33.]

Preconditions for an Attestation Engagement (Ref: par. ~~.24-.25b[iii]~~ .26)

~~.A34~~ The “Independence Standards for Engagements Performed in Accordance With Statements on Standards for Attestation Engagements” interpretation (ET sec. 1.297), establishes special requirements for independence for services provided under the attestation standards. In addition, the “Conceptual Framework Approach” interpretation (ET sec. 1.210.010) discusses threats to independence not specifically detailed elsewhere, for example, when the practitioner has an interest in the *underlying* subject matter.

Roles and Responsibilities (Ref: par. .2527a)

[No amendment to paragraph .A35.]

.A36 The responsible party may acknowledge its responsibility for the ***underlying*** subject matter ~~or for the written assertion~~ as it relates to the objective of the engagement in a number of ways, for example, in an engagement letter, a representation letter, or the presentation of the subject matter ***information***, including the notes thereto, or the written assertion. Examples of other evidence of the responsible party's responsibility for the ***underlying*** subject matter include reference to legislation, a regulation, or a contract.

Appropriateness of Subject Matter (Ref: par. .25b[i])

.A37 Evidence that the appropriate relationship exists with respect to responsibility for the ***underlying*** subject matter may be obtained through an acknowledgment provided by the responsible party. Such an acknowledgment also establishes a basis for a common understanding of the responsibilities of the responsible party and the practitioner. A written acknowledgment is the most appropriate form of documenting the responsible party's understanding. In the absence of a written acknowledgment of responsibility, it may still be appropriate for the practitioner to accept the engagement if, for example, other sources, such as legislation or a contract, indicate responsibility. In other cases, it may be appropriate to decline the engagement depending on the circumstances or disclose the circumstances in the attestation report.

Appropriateness of Underlying Subject Matter (Ref: par. .25b[i] .27b[i])

.A38 An element of the appropriateness of ***underlying*** subject matter is the existence of a reasonable basis for measuring or evaluating the ***underlying*** subject matter ***against criteria***. The responsible party in an ***assertion-based attestation examination engagement or review engagement*** is responsible for having a reasonable basis for measuring or evaluating the ***underlying*** subject matter ***against the criteria***. What constitutes a reasonable basis will depend on the nature of the ***underlying*** subject matter and other engagement circumstances. ~~In some cases, a formal process with extensive internal controls may be needed to provide the responsible party with a reasonable basis for concluding that the measurement or evaluation of the subject matter is free from material misstatement. The fact that the practitioner will report on the subject matter or assertion is not a substitute for the responsible party's own processes to have a reasonable basis for measuring or evaluating the subject matter or assertion.~~

.A39 An appropriate ***underlying*** subject matter

- a. is identifiable and, ~~in an examination or review engagement,~~ is capable of consistent measurement or evaluation against the criteria and
- b. can be subjected to procedures for obtaining sufficient appropriate evidence to support an opinion, conclusion, or findings, as appropriate.

.A40 If the *underlying* subject matter is not appropriate for an examination engagement, it also is not appropriate for a review engagement.

.A41 Different *underlying* subject matters have different characteristics, including the degree to which information about them is qualitative versus quantitative, objective versus subjective, historical versus prospective, and relates to a point in time or covers a period. Such characteristics affect the following:

- a. In an examination or review engagement, the precision with which the *underlying* subject matter can be measured or evaluated against criteria
- b. The persuasiveness of available evidence

.A42 Identifying such characteristics and considering their effects assists the practitioner when assessing the appropriateness of the *underlying* subject matter and also in determining the content of the practitioner's report.

.A43 In some cases, the attestation engagement may relate to only one part of a broader *underlying* subject matter. For example, the practitioner may be engaged to examine one aspect of an entity's contribution to sustainable development, such as the programs run by the entity that have positive environmental outcomes, and may be aware that the practitioner has not been engaged to examine more significant programs with less favorable outcomes. In such cases, in determining whether the engagement exhibits the characteristic of having an appropriate *underlying* subject matter, it may be appropriate for the practitioner to consider whether information about the aspect that the practitioner is asked to examine is likely to meet the information needs of intended users.

Suitable and Available Criteria (Ref: par. ~~.25b[iv]~~.27b[ii])

.A44 Suitable criteria exhibit all of the following characteristics:

- *Relevance.* Criteria are relevant to the *underlying* subject matter.
- *Objectivity.* Criteria are free from bias.
- *Measurability.* Criteria permit reasonably consistent measurements, qualitative or quantitative, of *underlying* subject matter.
- *Completeness.* Criteria are complete when subject matter *information* prepared in accordance with them does not omit relevant factors that could reasonably be expected to affect decisions of the intended users made on the basis of that subject matter *information*.

The relative importance of each characteristic to a particular engagement is a matter of professional judgment.

.A45 Criteria can be developed in a variety of ways, for example, they may be

- embodied in laws or regulations.
- issued by authorized or recognized bodies of experts that follow a transparent due

process.

- developed collectively by a group that does not follow a transparent due process.
- published in scholarly journals or books.
- developed for sale on a proprietary basis.
- specifically designed for the purpose of measuring, evaluating, or disclosing **information about the underlying** subject matter ~~or assertion~~ in the particular circumstances of the engagement.

How criteria are developed may affect the work that the practitioner carries out to assess their suitability.

[No amendment to paragraphs .A46–.A50.]

.A51 Even when established criteria exist for **an underlying** subject matter, specific users may agree to other criteria for their specific purposes. For example, various frameworks can be used as established criteria for evaluating the effectiveness of internal control. Specific users may, however, develop a more detailed set of criteria that meet their specific information needs.

.A52 If criteria are specifically designed for the purpose of measuring, evaluating, or disclosing **information about the underlying** subject matter ~~or assertion~~ in the particular circumstances of the engagement, they are not suitable if they result in subject matter **information**, ~~an assertion~~, or a practitioner’s report that is misleading to the intended users. It is desirable for the intended users or the engaging party to acknowledge that specifically developed criteria are suitable for the intended users’ purposes. The absence of such an acknowledgment may affect what is to be done to assess the suitability of the criteria and the information provided about the criteria in the report.

.A53 Criteria need to be available to the intended users to allow them to understand how the **underlying** subject matter has been measured or evaluated. Criteria are made available to the intended users in one or more of the following ways:

- a. Publicly
- b. Through inclusion in a clear manner in the presentation of the subject matter **information**
- c. Through inclusion in a clear manner in the practitioner’s report
- d. By general understanding, for example, the criterion for measuring time in hours and minutes
- e. Available only to specified parties, for example, terms of a contract or criteria issued by an industry association that are available only to those in the industry

[No amendment to paragraph .A54.]

Access to Evidence (Ref: ~~par. .25b~~~~iii~~27b[iii])

[No amendment to paragraph .A55.]

.A56 The quantity or quality of available evidence is affected by both of the following:

- a. The characteristics of the *underlying* subject matter *or the subject matter information*, for example, less objective evidence might be expected when the subject matter *information* is future-oriented, rather than historical
- b. Other circumstances, such as when evidence that could reasonably be expected to exist is not available, for example, because of the timing of the practitioner's appointment, an entity's document retention policy, inadequate information systems, or a restriction imposed by the responsible party or engaging party

Acceptance of a Change in the Terms of the Engagement (Ref: ~~par. .29~~.31)

.A57 A change in circumstances that affects the requirements of the responsible party or, if different, the engaging party, or a misunderstanding concerning the nature of the engagement originally requested, may be considered reasonable justification for requesting a change in the engagement, for example, from an attestation engagement to a consulting engagement or from an examination engagement to a review engagement. A change may not be considered reasonable if it appears that the change relates to information that is incorrect, incomplete, or otherwise unsatisfactory. An example of such a circumstance is a request to change the engagement from an examination to a review engagement to avoid a modified opinion or a disclaimer of opinion in a situation in which the practitioner is unable to obtain sufficient appropriate evidence regarding the *underlying* subject matter *or subject matter information*.

[No amendment to paragraph .A58.]

Using the Work of an Other Practitioner (Ref: ~~par. .31~~.33)

.A59 The practitioner is responsible for (a) the direction, supervision, and performance of the engagement in compliance with professional standards; applicable regulatory and legal requirements; and the firm's policies and procedures and (b) determining whether the practitioner's report that is issued is appropriate in the circumstances. The practitioner may, however, use the work of other practitioners to obtain sufficient appropriate evidence to express an opinion, conclusion, or findings on the subject matter *information* (or assertion).

[No amendment to paragraph .A60.]

Quality Control

Assignment of the Engagement Team and the Practitioner's Specialists (Ref: par. ~~.32a-b[i]~~.34a-b[i])

.A61 The practitioner may obtain knowledge about the specific *underlying* subject matter to which the procedures are to be applied *and the criteria* through formal or continuing education, practical experience, or consultation with others.

.A62 When considering the appropriate competence and capabilities expected of those involved in the engagement, the engagement partner may take into consideration such matters as their

- understanding of, and practical experience with, engagements of a similar nature and complexity through appropriate training and participation.
- understanding of professional standards and applicable legal and regulatory requirements.
- technical expertise, including expertise with relevant IT and specialized areas relevant to the *underlying* subject matter.
- knowledge of relevant industries in which the entity operates.
- ability to apply professional judgment.
- understanding of the firm's quality control policies and procedures.

.A63 Some of the attestation work may be performed by a multidisciplinary team that includes one or more practitioner's specialists. For example, in an examination engagement, a practitioner's specialist may be needed to assist the practitioner in obtaining an understanding of the *underlying* subject matter, *criteria*, and other engagement circumstances or in assessing or responding to the risk of material misstatement.

[No amendment to paragraph .A64.]

Engagement Documentation (Ref: par. ~~.34–.35.37–.38~~)

[No amendment to paragraph .A65.]

.A66 The completion of the assembly of the final engagement file is an administrative process that does not involve the performance of new procedures or the drawing of new conclusions. Changes may, however, be made to the documentation during the final assembly process if they are administrative in nature. Examples of such changes include the following:

- Deleting or discarding superseded documentation

- Sorting, collating, and cross-referencing working papers
- Signing off on completion checklists relating to the file assembly process
- Documenting evidence that the practitioner has obtained, discussed, and agreed with the relevant members of the engagement team before the date of the practitioner’s report
- Adding information received after the date of the report, for example, an original confirmation that was previously *communicated electronically* ~~faxed~~.

[No amendment to paragraphs .A67–.A70.]

Professional Judgment (Ref: par. .45.48)

[No amendment to paragraph .A71.]

.A72 For examination and review engagements, professional judgment is necessary regarding decisions about the following matters:

- Materiality and attestation risk
- The nature, timing, and extent of procedures used to meet the requirements of relevant AT-C sections and gather evidence
- Evaluating whether sufficient appropriate evidence for the service being provided has been obtained and whether more needs to be done to achieve the objectives of this section, section 205, **section 206**, or section 210, and any relevant subject-matter-specific AT-C sections and thereby the overall objectives of the practitioner
- ***In assertion-based examination engagements and review engagements, the*** The evaluation of the responsible party’s judgments in applying the criteria
- The drawing of conclusions based on the evidence obtained, for example, assessing the reasonableness of the evaluation or measurement of ***underlying*** subject matter ~~or an assertion~~

[No amendment to paragraphs .A73–.A75.]

.A76 The requirement to exercise professional judgment applies throughout the engagement. Professional judgment also needs to be appropriately documented as required by sections 205, **206**, and 210.

AT-C Section 205, *Assertion-Based Examination Engagements*

Introduction

.01 This section contains performance and reporting requirements and application guidance for assertion-based examination engagements. The requirements and guidance in this section supplement the requirements and guidance in section 105, *Concepts Common to All Attestation Engagements*. For purposes of applying this section, the term *subject matter* encompasses the terms *underlying subject matter* and *subject matter information*, as defined in AT-C section 105. If only one of these terms is applicable, that term is used.

Effective Date

.02 This section is effective for practitioners' assertion-based examination reports dated on or after June 15, 2022.

Objectives

.03 In conducting an assertion-based examination engagement, the objectives of the practitioner are to do the following:

- a. Obtain reasonable assurance about whether the subject matter as measured or evaluated against the criteria is free from material misstatement
- b. Express an opinion in a written report about whether
 - i. the subject matter is in accordance with (or based on) the criteria, in all material respects, or
 - ii. the responsible party's assertion is fairly stated, in all material respects.
- c. Communicate further as required by relevant AT-C sections.

Definitions

.04 For purposes of this section, the following terms have the meanings attributed as follows:

Appropriateness of evidence. The measure of the quality of evidence, that is, its relevancy and reliability in providing support for the practitioner's opinion.

Modified opinion. A qualified opinion, an adverse opinion, or a disclaimer of opinion.

Risk of material misstatement. The risk that the subject matter is not in accordance with (or based on) the criteria in all material respects or that the assertion is not fairly stated, in all material respects.

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.

Test of controls. A procedure designed to evaluate the operating effectiveness of controls in preventing, or detecting and correcting, material misstatements in the subject matter.

Requirements

Conduct of an Assertion-Based Examination Engagement

.05 In performing an assertion-based examination engagement, the practitioner should comply with this section, section 105, and any subject-matter AT-C section that is relevant to the engagement. A subject-matter AT-C section is relevant to the engagement when it is in effect, and the circumstances addressed by the AT-C section exist. (Ref: par. .A1)

Preconditions for an Assertion-Based Examination Engagement

.06 Section 105 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.¹ When the practitioner is not independent but is required by law or regulation to accept the engagement, the practitioner should disclaim an opinion 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 the practitioner chooses to provide the reasons for the lack of independence, the practitioner should include all the reasons therefor.

Agreeing on the Terms of the Engagement

.07 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. .A2)

.08 The agreed-upon terms of the engagement should include the following:

- a. The objective and scope of the engagement
- b. The responsibilities of the practitioner (Ref: par. .A3)
- c. A statement that the engagement will be conducted in accordance with attestation standards established by the AICPA
- d. The responsibilities of the responsible party and the responsibilities of the engaging party, if different (Ref: par. .A4–.A5)
- e. A statement about the inherent limitations of an examination engagement (Ref: par. A6)
- f. Identification of the criteria for the measurement, evaluation, or disclosure of the subject matter
- g. An acknowledgment that the engaging party agrees to provide the practitioner with a representation letter at the conclusion of the engagement

.09 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

¹ Paragraph .26 of section 105, *Concepts Common to All Attestation Engagements*.

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.

Requesting a Written Assertion

.10 The practitioner should request from the responsible party a written assertion about the measurement or evaluation of the underlying subject matter against the criteria. The practitioner should use professional judgment in determining whether management has a reasonable basis for making its assertion. When the engaging party is the responsible party and refuses to provide a written assertion, paragraph .84 requires the practitioner to withdraw from the engagement when withdrawal is possible under applicable law or regulation. When the engaging party is not the responsible party, and the responsible party refuses to provide a written assertion, the practitioner need not withdraw from the engagement. In that case, paragraph .86 requires the practitioner to disclose that refusal in the practitioner's report and restrict the use of the report to the engaging party. (Ref: par. .A7–.A12 and .A107)

Planning and Performing the Engagement

.11 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. .A13–.A16)

.12 In establishing the overall engagement strategy, the practitioner should do the following:

- 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
- d.* Ascertain the nature, timing, and extent of resources necessary to perform the engagement

.13 The practitioner should develop a plan that includes a description of the following items:

- a.* The nature, timing, and extent of planned risk assessment procedures
- b.* The nature, timing, and extent of planned further procedures (see paragraph .22)
- c.* Other planned procedures that are required to be carried out so that the engagement complies with the attestation standards

Risk Assessment Procedures

.14 The practitioner should obtain an understanding of the subject matter and other engagement circumstances sufficient to do the following: (Ref: par. .A17–.A18)

- a.* Enable the practitioner to identify and assess the risks of material misstatement in the subject matter information

- 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 opinion

.15 In obtaining an understanding of the subject matter in accordance with paragraph .14, 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 addition to inquiry of the personnel responsible for the subject matter.

.16 The practitioner should make inquiries of the responsible party regarding whether the responsible party has

- a.* an internal audit function. If the responsible party has an internal audit function, the practitioner should make further inquiries to obtain an understanding of the activities and main findings of the internal audit function with respect to the subject matter.
- b.* used any specialists in the preparation of the subject matter.

Materiality in Planning and Performing the Engagement

.17 The practitioner should consider materiality when establishing the overall engagement strategy; determining the nature, timing, and extent of procedures; and evaluating whether the subject matter is in accordance with (or based on) the criteria, in all material respects, or the assertion is fairly stated, in all material respects. (Ref: par. .A19–.A25)

.18 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.

Identifying Risks of Material Misstatement

.19 The practitioner should identify and assess risks of material misstatement as the basis for designing and performing further procedures whose nature, timing, and extent (Ref: par. .A26–.A27)

- a.* are responsive to assessed risks of material misstatement and
- b.* allow the practitioner to obtain reasonable assurance to support the practitioner’s opinion.

Responding to Assessed Risks and Obtaining Evidence

.20 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.

.21 The practitioner should design and implement overall responses to address the assessed risks of material misstatement for the subject matter or assertion. (Ref: par. .A28–.A29)

Further Procedures

.22 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.

.23 In designing and performing further procedures in accordance with paragraph .22, the practitioner should do the following:

- a. Consider the reasons for the assessment given to the risk of material misstatement, including
 - 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
- b. Obtain more persuasive evidence the higher the practitioner's assessment of risk

.24 When designing and performing procedures, the practitioner should consider the relevance and reliability of the information to be used as evidence. If

- 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), then 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.

Tests of Controls

.25 The practitioner should design and perform tests of controls to obtain sufficient appropriate evidence about the operating effectiveness of relevant controls if any of the following apply:

- a. The practitioner intends to rely on the operating effectiveness of controls in determining the nature, timing, and extent of other procedures.
- b. Procedures other than tests of controls cannot alone provide sufficient appropriate evidence.
- c. The subject matter is internal control.

.26 If the practitioner designed and performed tests of controls to rely on their operating effectiveness and identified deviations in those controls, the practitioner should make specific inquiries and perform other procedures as necessary to understand these matters and their potential consequences. The practitioner also should determine whether

- a. the tests of controls that have been performed provide an appropriate basis for reliance on the controls,
- b. additional tests of controls are necessary, or
- c. the potential risks of misstatement need to be addressed using other procedures.

Procedures Other Than Tests of Controls

.27 Irrespective of the assessed risks of material misstatement, the practitioner should design and perform tests of details or analytical procedures related to the subject matter, except when the subject matter is internal control.

Analytical Procedures Performed in Response to Assessed Risks

.28 When designing and performing analytical procedures in response to assessed risks, the practitioner should do the following: (Ref: par. .A30–.A31)

- 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;
- 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
- c. Develop an expectation that is sufficiently precise to identify possible material misstatements (taking into account whether analytical procedures are to be performed alone or in combination with tests of details).

.29 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 doing the following:

- a. Inquiring of the responsible party and obtaining additional evidence relevant to its responses
- b. Performing other procedures as necessary in the circumstances.

Procedures Regarding Estimates

.30 Based on the assessed risks of material misstatement, the practitioner should evaluate the following:

- a. Whether the responsible party has appropriately applied the requirements of the criteria relevant to any estimated amounts
- b. Whether the methods for making estimates are appropriate and have been applied consistently and whether changes, if any, in reported estimates or in the method for making them from the prior period, if applicable, are appropriate in the circumstances

.31 When responding to an assessed risk of material misstatement related to an estimate, the practitioner should undertake one or more of the following, taking into account the nature of the estimates:

- a. Determine whether events occurring up to the date of the practitioner’s report provide evidence regarding the estimate.
- b. Test how the responsible party made the estimate and the data on which it is based. In doing so, the practitioner should evaluate whether the
 - i. method of measurement used is appropriate in the circumstances,
 - ii. assumptions used by the responsible party are reasonable, and
 - iii. data on which the estimate is based are sufficiently reliable for the practitioner’s purposes.

- c. Test the operating effectiveness of the controls over how the responsible party made the estimate, together with other appropriate further procedures.
- d. Develop a point estimate or a range to evaluate the responsible party's estimate. For this purpose, if the practitioner
 - i. uses assumptions or methods that differ from those of the responsible party, the practitioner should obtain an understanding of the responsible party's assumptions or methods sufficient to establish that the practitioner's point estimate or range takes into account relevant variables and to evaluate any significant differences from the responsible party's point estimate.
 - ii. concludes that it is appropriate to use a range, the practitioner should narrow the range, based on evidence available, until all outcomes within the range are considered reasonable.

Sampling

.32 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 the following: (Ref: par. .A32)

- 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 from the prescribed control in the case of tests of controls or a misstatement in the case of tests of details
- 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
- e. Evaluating the results of the sample, including sampling risk and projecting misstatements found in the sample to the population
- f. Evaluating whether the use of sampling has provided an appropriate basis for conclusions about the population that has been tested

Fraud, Laws, and Regulations

.33 The practitioner should do the following:

- a. 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
- b. Make inquiries of the appropriate party to determine whether the party has knowledge of any actual, suspected, or alleged fraud or noncompliance with laws or regulations affecting the subject matter
- c. 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

- d. Evaluate whether other information obtained indicates risk of material misstatement due to fraud or noncompliance with laws or regulations

.34 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. .A33–.A34)

Revision of Risk Assessment

.35 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. .A35–.A36)

Evaluating the Reliability of Information Produced by the Entity

.36 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: (Ref: par. .A37–.A38)

- 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

Using the Work of a Practitioner’s Specialist

.37 When the practitioner expects to use the work of a practitioner’s specialist, the practitioner should do the following:

- 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. .A39–.A42)
- b. Obtain a sufficient understanding of the field of expertise of a practitioner’s specialist to enable the practitioner to (Ref: par. .A43)
 - i. determine the nature, scope, and objectives of that specialist’s work for the practitioner’s purposes and
 - ii. evaluate the adequacy of that work for the practitioner’s purposes.
- c. Agree with the practitioner’s specialist regarding (Ref: par. .A44)
 - 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.

- d. Evaluate the adequacy of the work of the practitioner's specialist for the practitioner's purposes, including
 - 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
 - (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; and
 - 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.

.38 If the practitioner determines that the work of the practitioner's specialist is not adequate for the practitioner's purposes, the practitioner should

- 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.

.39 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 extent of those procedures, the practitioner should consider the following: (See section 105.²)

- a. The significance of that specialist's work in the context of the engagement (See also paragraphs .A45–.A46)
- 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 .A47)

Using the Work of Internal Auditors

.40 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 assertion-based examination by evaluating the following: (Ref: par. .A48–.A50)

- a. The level of competence of the internal audit function or the individual internal auditors providing direct assistance

² Paragraph .34 of section 105.

- 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
- 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

.41 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 assertion-based examination engagement. This includes reperforming some of the body of work of the internal audit function that the practitioner intends to use in obtaining evidence.

.42 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.

.43 When using internal auditors to provide direct assistance to the practitioner, the practitioner should direct, supervise, and review the work of the internal auditors.

.44 Because the practitioner has sole responsibility for the opinion expressed, the practitioner should make all significant judgments in the assertion-based examination engagement, including when to use 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 in the following circumstances:

- a. The more judgment is involved in
 - i. planning and performing relevant procedures or
 - ii. evaluating the evidence obtained
- b. the higher the assessed risk of material misstatement;
- c. the less the internal audit function's organizational status and relevant policies and procedures adequately support the objectivity of the internal auditors
- d. the lower the level of competence of the internal audit function.

.45 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 assertion-based examination given the practitioner's sole responsibility for the opinion expressed.

Evaluating the Results of Procedures

.46 The practitioner should accumulate misstatements identified during the engagement other than those that are clearly trivial. (Ref: par. .A51–.A52)

.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 contradict the measurement or evaluation of the subject matter against the criteria. (Ref: par. .A53–.A57)

.48 If the practitioner is unable to obtain sufficient appropriate evidence, a scope limitation exists and the practitioner should express a qualified opinion, disclaim an opinion, or withdraw from the engagement, when withdrawal is possible under applicable law or regulation. The practitioner should apply the requirements in paragraphs .70–.86 when a scope limitation exists and the practitioner is determining the type of opinion to be issued.

Considering Subsequent Events and Subsequently Discovered Facts

.49 The practitioner should inquire whether the responsible party, and if different, the engaging party, is aware of any events subsequent to the period (or point in time) covered by the assertion-based examination engagement up to the date of the practitioner’s report that could have a significant effect on the subject matter or assertion. If so, the practitioner should apply other appropriate procedures to obtain evidence regarding such events. 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 users of the report 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. .A58–.A60)

.50 The practitioner has no responsibility to perform any procedures regarding the subject matter or assertion 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 report that, had they been known to the practitioner at that date, may have caused the practitioner to revise the report. (Ref: par. .A61–.A62)

Written Representations

.51 The practitioner should request from the responsible party written representations in the form of a letter addressed to the practitioner. The representations should do the following: (Ref: par. .A63–.A66)

- a.* Include the responsible party’s assertion about the subject matter based on the criteria. (Ref: par. .A107)
- b.* State that all relevant matters are reflected in the measurement or evaluation of the subject matter or assertion.
- c.* State that all known matters contradicting the subject matter or assertion and any communication from regulatory agencies or others affecting the subject matter or assertion have been disclosed to the practitioner, including communications received between the end of the period addressed in the written assertion and the date of the practitioner’s report.
- d.* Acknowledge responsibility for
 - i.* the subject matter and the responsible party’s assertion;
 - ii.* selecting the criteria, when applicable; and
 - iii.* determining that such criteria are suitable, will be available to the intended users, and appropriate for the purpose of the engagement.
- e.* State that the responsible party has disclosed to the practitioner

- i. all deficiencies in internal control relevant to the engagement of which the responsible party is aware;
 - ii. its knowledge of any actual, suspected, or alleged fraud or noncompliance with laws or regulations affecting the subject matter; and
 - iii. other matters as the practitioner deems appropriate.
- f. 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 or assertion have been disclosed to the practitioner. (Ref: par. .A65)
 - g. State that it has provided the practitioner with all relevant information and access, as agreed upon in the terms of the engagement.
 - h. If applicable, state that the responsible party believes the effects of uncorrected misstatements are immaterial, individually and in the aggregate, to the subject matter. (Ref: par. .A66)
 - i. If applicable, state that significant assumptions used in making any material estimates are reasonable.

.52 When the engaging party is not the responsible party, and the responsible party refuses to provide the representations in paragraph .51 in writing, the practitioner should make inquiries of the responsible party about, and seek oral responses to, the matters in paragraph .51 (Ref: par. .A67)

.53 When the engaging party is not the responsible party, the practitioner should request written representations from the engaging party in addition to those requested from the responsible party in the form of a letter addressed to the practitioner. The representations should do the following:

- a. Acknowledge that the responsible party is responsible for the subject matter being in accordance with the criteria and for its assertion
- b. Acknowledge the engaging party's responsibility for selecting the criteria
- c. Acknowledge the engaging party's responsibility for determining that such criteria are suitable, will be available to the intended users, and are appropriate for the purpose of the engagement
- d. State that the engaging party is not aware of any material misstatements in the subject matter information or assertion
- e. 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 or assertion. (Ref: par. .A65)
- f. Address other matters as the practitioner deems appropriate

.54 When written representations are directly related to matters that are material to the subject matter, the practitioner should

- a. evaluate their reasonableness and consistency with other evidence obtained, including other representations (oral or written) and
- b. consider whether those making the representations can be expected to be well informed on the particular matters.

.55 The date of the written representations should be as of the date of the practitioner's report. The written representations should address the subject matter and periods covered by the practitioner's opinion.

Requested Written Representations Not Provided or Not Reliable

.56 When the engaging party is the responsible party, and 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 do the following: (Ref: par. .A68–.A70)

- a.* Discuss the matter with the appropriate party
- b.* 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
- c.* If any of the matters are not resolved to the practitioner's satisfaction, take appropriate action, including determining the possible effect on the opinion in the practitioner's report

.57 When the engaging party is not the responsible party

- a.* if one or more of the requested representations are not provided in writing by the responsible party, but the practitioner receives satisfactory oral responses to the practitioner's inquiries performed in accordance with paragraph .52 sufficient to enable the practitioner to conclude that the practitioner has sufficient appropriate evidence to form an opinion about the subject matter, the practitioner's report should contain a separate paragraph that restricts the use of the report to the engaging party. (Paragraphs .64–.66 contain requirements for the contents of such a paragraph.) (Ref: par. .A72)
- b.* if one or more of the requested representations are provided neither in writing nor orally from the responsible party in accordance with paragraph .52, a scope limitation exists, and the practitioner should determine the effect on the report, or the practitioner should withdraw from the engagement. (Ref: par. .A72)

Other Information

.58 If prior to or after the release of the practitioner's report on subject matter or an assertion the practitioner is willing to permit the inclusion of the report in a document that contains the subject matter or assertion and other information, the practitioner should read the other information to identify material inconsistencies, if any, with the subject matter, assertion, or report. If upon reading the other information, in the practitioner's professional judgment either of the following applies, the practitioner should discuss the matter with the appropriate party and take further action as appropriate: (Ref: par. .A73–.A74)

- a.* A material inconsistency between the other information and the subject matter, assertion, or the report exists
- b.* A material misstatement of fact exists in the other information, the subject matter, assertion, or report

Description of Criteria

.59 The practitioner should evaluate whether the written description of the subject matter or assertion adequately refers to or describes the criteria. (Ref: par. .A75–.A76)

Forming the Opinion

.60 The practitioner should form an opinion about whether the subject matter is in accordance with (or based on) the criteria, in all material respects, or the assertion is fairly stated, in all material respects. In forming that opinion, the practitioner should evaluate

- a.* the practitioner’s conclusion regarding the sufficiency and appropriateness of evidence obtained and (Ref: par. .A77)
- b.* whether uncorrected misstatements are material, individually or in the aggregate. (Ref: par. .A78)

.61 The practitioner should evaluate, based on the evidence obtained, whether the presentation of the subject matter or assertion is misleading within the context of the engagement. (Ref: par. .A79–.A80)

Preparing the Practitioner’s Report

.62 The practitioner’s report should be in writing. (Ref: par. .A81–.A84)

Content of the Practitioner’s Report

.63 The practitioner’s report should include the following, unless the practitioner is disclaiming an opinion, in which case, items .63*g*, and .63*h* should be omitted:

- a.* A title that includes the word *independent*. (Ref: par. .A85)
- b.* An appropriate addressee as required by the circumstances of the engagement.
- c.* An identification or description of the subject matter or assertion being reported on, including the point in time or period of time to which the measurement or evaluation of the subject matter or assertion relates.
- d.* An identification of the criteria against which the subject matter was measured or evaluated. (Ref: par. .A86)
- e.* A statement that identifies the responsible party and its responsibility for the subject matter being in accordance with (or based on) the criteria or for its assertion. (Ref: par. .A87)
- f.* A statement that the practitioner’s responsibility is to express an opinion on the subject matter or assertion, based on the practitioner’s examination. (Ref: par. .A88)
- g.* A statement that
 - i.* the practitioner’s examination was conducted in accordance with attestation standards established by the AICPA. (Ref: par. .A89)
 - ii.* those standards require that the practitioner plan and perform the examination to obtain reasonable assurance about whether
 - (1) 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. A90) or
 - (2) the responsible party’s assertion is fairly stated, in all material respects.

- iii. the practitioner believes the evidence the practitioner obtained is sufficient and appropriate to provide a reasonable basis for the practitioner's opinion.
- h. A description of the nature of an assertion-based examination engagement. (Ref: par. .A91–.A93)
- i. A statement that the practitioner is required to be independent and to meet the practitioner's other ethical responsibilities in accordance with relevant ethical requirements related to the examination engagement. (Ref: par. .A94–.A95)
- j. A statement that describes significant inherent limitations, if any, associated with the measurement or evaluation of the subject matter against the criteria. (Ref: par. .A96)
- k. The practitioner's opinion about whether (Ref: par. .A97–.A100)
 - i. the subject matter is in accordance with (or based on) the criteria, in all material respects or
 - ii. the responsible party's assertion is fairly stated, in all material respects
- l. The manual or printed signature of the practitioner's firm.
- m. The city and state where the practitioner's report is issued. (Ref: par. .A101)
- n. 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 opinion, including evidence that
 - i the attestation documentation has been reviewed,
 - ii. if applicable, the written presentation of the subject matter has been prepared, and
 - iii. the responsible party has provided a written assertion or, in the circumstances described in paragraph .A72, an oral assertion.) (Ref: par. .A102–.A103)

Restricted-Use Paragraph

.64 In the following circumstances, the practitioner's report should include an alert, in a separate paragraph, that restricts the use of the report: (Ref: par. .A104–.A106)

- 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 matter are available only to specified parties.
- c. The engaging party is not the responsible party, and the responsible party does not provide the written representations required by paragraph .51 but does provide oral responses to the practitioner's inquiries about the matters in paragraph .51, as provided for in paragraph .52 and .57a. In this case, the use of the practitioner's report should be restricted to the engaging party. (Ref: par. .A107)

.65 The alert should

- a. state that the practitioner's 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. .A108)

- c. state that the report is not intended to be, and should not be, used by anyone other than the specified parties. (Ref: par. .A109–.A111)

.66 When the engagement is also performed in accordance with *Government Auditing Standards*, the alert that restricts the use of the practitioner’s report should include the following information, rather than the information required by paragraph .65:

- a. A description of the purpose of the report
- b. A statement that the report is not suitable for any other purpose

.67 A practitioner should report on a written assertion or directly on the subject matter. If the opinion is modified because of a material misstatement, the practitioner should report directly on the subject matter, even when the assertion acknowledges the misstatement.

.68 If the practitioner is reporting on the assertion, the assertion should be bound with or accompany the practitioner’s report, or the assertion should be clearly stated in the report.

Reference to the Practitioner’s Specialist

.69 The practitioner should not refer to the work of a practitioner’s specialist in the practitioner’s report containing an unmodified opinion. (Ref: par. .A112)

Modified Opinions

.70 The practitioner should modify the opinion when either of the following circumstances exist and, in the practitioner’s professional judgment, the effect of the matter is or may be material: (Ref: par. .A113–.A114)

- 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.

.71 When the practitioner modifies the opinion, the practitioner should include a separate paragraph in the practitioner’s report that provides a description of the matter giving rise to the modification.

.72 The practitioner should express a qualified opinion when either of the following applies: (Ref: par. .A115–.A119)

- a. The practitioner, having obtained sufficient appropriate evidence, concludes that misstatements, individually or in the aggregate, are material, but not pervasive to the subject matter.
- b. The practitioner is unable to obtain sufficient appropriate evidence on which to base the opinion, but the practitioner concludes that the possible effects on the subject matter of undetected misstatements, if any, could be material but not pervasive.

.73 When the practitioner expresses a qualified opinion due to a material misstatement of the subject matter, the practitioner should state that, in the practitioner’s opinion, except for the effects of the matter or matters giving rise to the modification, the subject matter is 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 opinion.

.74 The practitioner should express an adverse opinion when the practitioner, having obtained sufficient appropriate evidence, concludes that misstatements, individually or in the aggregate, are both material and pervasive to the subject matter.

.75 When the practitioner expresses an adverse opinion, the practitioner should state that, in the practitioner's opinion, because of the significance of the matter or matters giving rise to the modification, the subject matter is not in accordance with (or based on) the criteria, in all material respects.

.76 If the practitioner has concluded that conditions exist that, individually or in combination, result in one or more material misstatements based on the criteria, the practitioner should modify the opinion and express a qualified or adverse opinion directly on the subject matter, not on the assertion, even when the assertion acknowledges the misstatement.

.77 The practitioner should disclaim an opinion when the practitioner is unable to obtain sufficient appropriate evidence on which to base the opinion, and the practitioner concludes that the possible effects on the subject matter of undetected misstatements, if any, could be both material and pervasive. (Ref: par. .A120)

.78 When the practitioner disclaims an opinion due to an inability to obtain sufficient appropriate evidence, the practitioner's report should state the following:

- a. Because of the significance of the matter or matters giving rise to the modification, the practitioner has not been able to obtain sufficient appropriate evidence to provide a basis for an examination opinion.
- b. Accordingly, the practitioner does not express an opinion on the subject matter.

Description of the Practitioner's Responsibility When the Practitioner Expresses a Qualified or an Adverse Opinion

.79 When the practitioner expresses a qualified or an adverse opinion, 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 opinion.

Description of the Practitioner's Responsibility When the Practitioner Disclaims an Opinion

.80 When the practitioner disclaims an opinion 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 or assertion. The practitioner should also amend the description of the practitioner's responsibility and the description of an assertion-based examination to state only the following:

Our responsibility is to express an opinion on the subject matter or assertion based on conducting the examination in accordance with attestation standards established by the AICPA. Because of the limitation on the scope of our examination discussed in the preceding paragraph, the scope of our work was not sufficient to enable us to express, and we do not express, an opinion on whether the subject matter is in accordance with (or based on) the criteria, in all material respects.

.81 If the practitioner expresses a modified opinion because of a scope limitation but is also aware of a matter that causes the subject matter to be materially misstated, the practitioner should include in the practitioner's report a clear description of both the scope limitation and the matter that causes the subject matter to be materially misstated.

.82 The practitioner’s opinion on the subject matter or assertion should be clearly separated from any paragraphs emphasizing matters related to the subject matter or any other reporting responsibilities. Any paragraphs emphasizing matters related to the subject matter or any other reporting responsibilities should be phrased in a manner that makes it clear that these paragraphs are not intended to detract from that opinion.

.83 When the opinion is modified, reference to an external specialist is permitted when such reference is relevant to an understanding of the modification to the practitioner’s opinion. The practitioner should indicate in the practitioner’s report that such reference does not reduce the practitioner’s responsibility for that opinion.

Responsible Party Refuses to Provide a Written Assertion

.84 If the engaging party is the responsible party and refuses to provide the practitioner with a written assertion as required by paragraph .10, the practitioner should withdraw from the engagement when withdrawal is possible under applicable law or regulation.

.85 If law or regulation does not allow the practitioner to withdraw from the engagement, the practitioner should disclaim an opinion.

.86 When the engaging party is not the responsible party and the responsible party refuses to provide the practitioner with a written assertion, the practitioner may report on the subject matter but should disclose in the practitioner’s report the responsible party’s refusal to provide a written assertion and should restrict the use of the practitioner’s report to the engaging party. (Ref: par. .A121–.A123)

Communication Responsibilities

.87 The practitioner should communicate to the responsible party known and suspected fraud and noncompliance with laws or regulations, uncorrected misstatements, 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. .A124)

.88 In the event the practitioner encounters known or suspected fraud or noncompliance with laws or regulations in connection with the engagement, the practitioner should consider responsibilities under the AICPA Code of Professional Conduct and applicable law prior to communicating such information either to the responsible party or the engaging party. (Ref: par. .A125–.A126)

Documentation

.89 The practitioner should prepare engagement documentation that is sufficient to determine the following: (Ref: par. .A127–.A130)

- a. The nature, timing, and extent of the procedures performed to comply with relevant AT-C sections and applicable legal and regulatory requirements, including the following:
 - 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 .56
 - v. When the engaging party is not the responsible party and the responsible party will not provide the written representations regarding the matters in paragraph .51, the oral responses from the responsible party to the practitioner's inquiries regarding the matters in paragraph .51, in accordance with paragraph .52
 - vi. Who reviewed the engagement work performed and the date and extent of such review
 - vii. If the practitioner identified information that is inconsistent with the practitioner's final opinion regarding a significant matter, how the practitioner addressed the inconsistency
- b. The results of the procedures performed and the evidence obtained

.90 If, in circumstances such as those described in paragraph .50, the practitioner performs new or additional procedures or draws new conclusions after the date of the practitioner's report, the practitioner should document the following:

- a. The circumstances encountered
- b. The new or additional procedures performed, evidence obtained, and conclusions reached, and their effect on the report
- c. When and by whom the resulting changes to the documentation were made and reviewed

Application and Other Explanatory Material

Conduct of an Assertion-Based Examination Engagement (Ref: par. .05)

.A1 For example, if a practitioner were examining prospective financial information, section 105, this section, and section 305, *Prospective Financial Information*, would be relevant.

Agreeing on the Terms of the Engagement (Ref: par. .07, .08b, .08d, and .08e)

.A2 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.

.A3 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:

- a. A statement that an examination is designed to obtain reasonable assurance about whether the subject matter as measured or evaluated against the criteria is free from material misstatement
- b. A statement that the objective of an examination is the expression of an opinion in a written practitioner's report about whether the subject matter is in accordance with (or based on) the criteria, in all material respects, or whether the responsible party's assertion is fairly stated, in all material respects

.A4 Situations may exist in which the responsible party is not the engaging party and, as such, the responsibilities of each party may differ. For example, when the responsible party is not the engaging party, the engaging party, rather than the responsible party, may be responsible for

selecting the criteria.

.A5 The engaging party may request that the practitioner recommend, develop, or assist in developing the criteria for the engagement. Regardless of whether the practitioner recommends, develops, or assists in developing or selecting the criteria for the engagement, the engaging party is required to take responsibility for the criteria.

.A6 If relevant, a statement about the inherent limitations of an examination engagement may indicate that “because of the inherent limitations of an examination engagement, together with the inherent limitations of internal control, an unavoidable risk exists that some material misstatements may not be detected, even though the examination is properly planned and performed in accordance with the attestation standards.”

Requesting a Written Assertion (Ref: par. .10)

.A7 What constitutes a reasonable basis for the responsible party’s assertion depends on the nature of the subject matter and other engagement circumstances. In some cases, a formal process with extensive internal control may be needed to provide the responsible party with a reasonable basis for making its assertion. The fact that the practitioner will report on the subject matter is not a substitute for the responsible party’s own processes to have a reasonable basis for its assertion.

.A8 The language of the responsible party’s written assertion in paragraph .10 may need to be tailored to reflect the nature of the underlying subject matter and criteria for the engagement. Examples of language that meet the requirements in paragraph .10 include the following:

- The subject matter is presented in accordance with (or based on) the criteria.
- The subject matter achieved the objectives, for example, when the objectives are the criteria.
- The subject matter is presented fairly, based on the criteria.

.A9 Situations may arise in which the current responsible party was not present during some or all of the period covered by the practitioner’s report. Such persons may contend that they are not in a position to provide a written assertion that covers the entire period because they were not in place during some or all of the period. This fact, however, does not diminish such persons’ responsibilities for the subject matter as a whole. Accordingly, the requirement for the practitioner to request a written assertion from the responsible party that covers the entire relevant period or periods still applies.

.A10 Paragraph .51a requires the practitioner to request a written representation from the responsible party that is the same as the responsible party’s assertion. If the responsible party provides the practitioner with the written representation in paragraph .51a, the practitioner need not request a separate written assertion unless a separate written assertion is called for by the engagement circumstances.

.A11 A practitioner may also be engaged to assist the responsible party in measuring or evaluating the subject matter against the criteria in connection with the responsible party providing a written assertion.

.A12 Regardless of the procedures performed by the practitioner, the responsible party is required to accept responsibility for its assertion and the subject matter. An assertion based solely on the practitioner's procedures would not be considered a reasonable basis for the assertion.³

³ The “Nonattest Services” subtopic (ET sec. 1.295) of the AICPA Code of Professional Conduct addresses the practitioner’s provision of nonattest services for an attest client.

Planning and Performing the Engagement (Ref: par. .11)

.A13 Planning involves the engagement partner and other key members of the engagement team and may involve the practitioner's specialists in developing

- 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.

Adequate planning helps the practitioner devote appropriate attention to important areas of the engagement, identify potential problems on a timely basis, and properly organize and manage the engagement 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:

- The characteristics of the engagement that define its scope, including the terms of the engagement, the characteristics of the subject matter, and the criteria
- The expected timing and the nature of the communications required
- 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 appropriate party is relevant
- The engagement process, including possible sources of evidence, and choices among alternative measurement or evaluation methods
- The practitioner's understanding of the appropriate party and its environment, including the risks that the subject matter or assertion 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

.A14 The practitioner may decide to discuss elements of planning with the appropriate party 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 to avoid compromising 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.

.A15 Planning is not a discrete phase but, rather, a cumulative and iterative process throughout the engagement. Because 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.

.A16 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. In such cases, establishing the overall engagement strategy need not be a complex or time-consuming exercise; it varies according to the size of the entity, complexity of the engagement, and size of the engagement team.

Risk Assessment Procedures (Ref: par. .14)

.A17 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 doing the following:

- 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
- Evaluating evidence, including the reasonableness of the written representations received by the practitioner

.A18 In assessing inherent risk, the practitioner may consider factors relevant to assertion-based examination engagements, such as the following:

- The complexity of the subject matter or assertion
- The length of time during which the entity has had experience with the subject matter or assertion
- Prior experience with the entity's assessment of the subject matter or assertion

Materiality in Planning and Performing the Engagement (Ref: par. .16)

.A19 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.

.A20 Professional judgments about materiality are made considering surrounding circumstances, but they are not affected by the level of assurance, that is, for the same intended users, materiality for an assertion-based examination engagement is the same as it is for a review engagement because materiality is based on the information needs of intended users and not the level of assurance.

.A21 In general, misstatements, including omissions, are considered to be material if there is a substantial likelihood that, individually or in the aggregate, they could influence the judgment made by intended users 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. For purposes of determining materiality, the practitioner may assume that intended users

- 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 subjected to procedures using appropriate levels of materiality and that they 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 judgments based on the subject matter.

Unless the engagement has been designed to meet the particular information needs of specific users, the possible effect of misstatements on specific users, whose information needs may vary widely, is not ordinarily considered.

.A22 Qualitative factors may include the following:

- 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, whether the effect of an adjustment 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

.A23 Quantitative factors relate to the magnitude of misstatements relative to reported amounts for those aspects of the subject matter, if any, that are

- expressed numerically or
- otherwise related to numerical values, for example, the number of observed deviations in the operation of a control when the assertion-based examination involves the effectiveness of the control.

.A24 When quantitative factors are applicable, planning the engagement solely to detect individually material misstatements overlooks the fact that the aggregate of individually immaterial misstatements 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 identified in previous attestation engagements.

.A25 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 .A19–.A24. If the criteria do not include a discussion of the concept of materiality, these paragraphs provide the practitioner with a frame of reference.

Identifying Risks of Material Misstatement (Ref: par. .19)

.A26 Most of the practitioner’s work in forming an opinion 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.

.A27 In some cases, a subject-matter-specific section may include requirements that affect the nature, timing, and extent of procedures. For example, a subject-matter-specific section 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.

Responding to Assessed Risks and Obtaining Evidence (Ref: par. .21)

.A28 Overall responses to address the assessed risks of material misstatement of the subject matter or assertion may include the following:

- 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
- 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)

.A29 The assessment of the risks of material misstatement of the subject matter or assertion 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 doing the following:

- 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
- Increasing the number of locations to be included in the scope of the assertion-based examination

Analytical Procedures Performed in Response to Assessed Risks (Ref: par. .28)

.A30 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.

.A31 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 by the responsible party to measure, recognize, and record the subject matter; and, if applicable, the industry in which the entity operates.

Sampling (Ref: par. .32)

.A32 The AICPA Audit Guide *Audit Sampling* provides guidance that may be useful to a practitioner who has decided to use sampling in performing attestation procedures.

Fraud, Laws, and Regulations (Ref: par. .34)

.A33 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, do the following:

- Discuss the matter with the appropriate party
- 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

.A34 The actions noted in paragraph .A33 may also be appropriate in responding to noncompliance or suspected noncompliance with laws or regulations identified during the engagement. It may be appropriate to describe the matter in a separate paragraph in the practitioner's report, unless either of the following apply:

- a. The practitioner 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 .70a and 77 apply.
- b. The practitioner concludes that the noncompliance results in a material misstatement of the subject matter, in which case, paragraph 70b and 76 apply.

Revision of Risk Assessment (Ref: par. .35)

.A35 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.

.A36 The practitioner may become aware of a matter 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.

Evaluating the Reliability of Information Produced by the Entity (Ref: par. .36)

.A37 Reliable information is sufficiently accurate and complete.

.A38 Obtaining evidence about the accuracy and completeness of information produced by the entity may be accomplished concurrently with the actual procedure applied to the information when obtaining such evidence is an integral part of the procedure itself. In other situations, the practitioner may have obtained evidence of the accuracy and completeness of such information by testing controls over the preparation and maintenance of the information. In some situations, however, the practitioner may determine that additional procedures are needed.

Using the Work of a Practitioner's Specialist

The Competence, Capabilities, and Objectivity of a Practitioner's Specialist (Ref: par. .37a)

.A39 Information regarding the competence, capabilities, and objectivity of a practitioner's specialist may come from a variety of sources, such as the following:

- 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

.A40 Although a practitioner's specialist does not require the same proficiency as the practitioner in performing all aspects of an assertion-based examination engagement, a practitioner's specialist whose work is used may need a sufficient understanding of relevant AT-C sections to enable that specialist to relate the work assigned to that specialist to the engagement objective.

.A41 The evaluation of the significance of threats to objectivity and 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 safeguards cannot reduce threats to an acceptable level, for example, if in an assertion-based examination engagement a practitioner's specialist is an individual who has played a significant role in measuring, evaluating, or disclosing the subject matter.

.A42 When evaluating the objectivity of a practitioner's external specialist, it may be relevant to do the following:

- Inquire of the appropriate party about any known interests or relationships that the appropriate party 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 may be relevant to discuss with the practitioner's specialist include

- 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.

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 of which that specialist is aware.

Obtaining an Understanding of the Field of Expertise of a Practitioner's Specialist (Ref: par. .37b)

.A43 Aspects of a practitioner's specialist's field of expertise relevant to the practitioner's understanding may include the following:

- 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 practitioner's specialist uses

Agreement With a Practitioner's Specialist (Ref: par. .37c)

.A44 The matters noted in paragraph .A46 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.

Integrating the Work of a Practitioner's Specialist (Ref: par. .39a)

.A45 Assertion-based examination engagements may be performed on a wide range of subject matters that require specialized skills and knowledge beyond those 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 effective two-way communication is 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.

.A46 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 .37 at the engagement acceptance or continuance stage. In particular, this is appropriate 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.

The Practitioner's Firm's Quality Control Policies and Procedures (Ref: par. .39e)

.A47 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:

- 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 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.)
- Adherence to regulatory and legal requirements through monitoring processes.
- Agreement with the practitioner's specialist.

Such reliance does not reduce the practitioner's responsibility to meet the requirements of this section.

Using the Work of Internal Auditors (Ref: par. .40)

.A48 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 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, the competence of the internal auditors, and the systematic and disciplined approach of the function that are relevant. References in this section to the work of the internal audit function include relevant activities of other functions or third-party providers that have these characteristics.

.A49 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.

.A50 The practitioner has sole responsibility for the opinion expressed, and that responsibility is not reduced by the practitioner's use of the work of internal auditors on the engagement. The objectivity and competence of internal auditors are important in determining whether to use their work and, if the practitioner decides to use their work, 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.

Evaluating the Results of Procedures (Ref: par. .46–.47)

.A51 Uncorrected misstatements are accumulated during the engagement for the purpose of evaluating whether, individually or in aggregate, they are material when forming the practitioner’s opinion. (See also paragraph .60*b*)

.A52 “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.

.A53 Sufficient appropriate evidence is necessary to support the practitioner’s opinion and 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. Also, information that may be used as evidence may have been prepared by a specialist employed or engaged by the appropriate party. *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 to provide a requested representation) is considered by the practitioner and, therefore, also constitutes evidence.

.A54 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.

.A55 *Appropriateness of evidence* is the measure of the quality of evidence, that is, its relevance and reliability in providing support for the practitioner’s opinion. The reliability of evidence is influenced by its source and nature and is dependent on the individual circumstances under which it is obtained. Generalizations about the reliability of various 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:

- Evidence is more reliable when it is obtained from independent sources outside the appropriate party.
- 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.

.A56 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 are necessary to resolve the inconsistency.

.A57 Whether sufficient appropriate evidence has been obtained on which to base the practitioner's opinion is a matter of professional judgment.

Considering Subsequent Events and Subsequently Discovered Facts (Ref: par. .49–.50)

.A58 For certain subject-matter AT-C sections, specific subsequent events requirements and related application guidance have been developed for engagement performance and reporting.

.A59 Procedures that a practitioner may perform to identify subsequent events include inquiring about and considering information

- 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.

.A60 If the responsible party refuses to disclose a subsequent event for which disclosure is necessary to prevent users of the practitioner's report from being misled, appropriate actions the practitioner may take include the following:

- Disclosing the event in the practitioner's report and modifying the practitioner's opinion
- Withdrawing from the engagement

.A61 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 report. In such circumstances, the practitioner undertakes to determine if the facts existed at the date of the report and, if so, whether persons who would attach importance to these facts are currently using, or are likely to use, the report and related subject matter or assertion. This may include discussing the matter with the appropriate party and requesting the appropriate party'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 and the practitioner may vary with the circumstances. Consideration may be given to, among other things, the time elapsed since the date of the 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 or assertion needs revision and whether the previously issued report continues to be appropriate.

.A62 Depending on the circumstances, the practitioner may determine that notification of the situation by the appropriate party to persons who would attach importance to the facts and who are currently using, or are likely to use, the practitioner's report is necessary. This may be the case, for example, when

- a. the report is not to be relied upon because the subject matter or assertion needs revision or the practitioner is unable to determine whether revision is necessary, and
- b. issuance of a subsequent report is not imminent.

If the appropriate party failed to take the necessary steps to prevent reliance on the 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 its effect on the subject matter or assertion and the report, avoiding comments concerning the conduct or motives of any person.

Written Representations (Ref: par. .51–.52, .53e, and .57a)

.A63 Written confirmation of oral representations reduces the possibility of misunderstandings between the practitioner and the responsible party. The person 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, which may vary by entity, reflecting influences such as size and ownership characteristics.

.A64 Representations by the responsible party cannot replace other evidence the practitioner could reasonably expect to be available. Although written representations provide 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.

.A65 A discussion of what is considered a material effect on the subject matter or assertion may be included explicitly in the representation letter in qualitative or quantitative terms.

.A66 A summary of uncorrected misstatements ordinarily is included in or attached to the written representation.

.A67 Certain subject-matter AT-C sections do not permit the practitioner to perform the alternative procedures described in paragraphs .52 and .57a (making inquiries of the responsible party and restricting the use of the practitioner’s report).

Requested Written Representations Not Provided or Not Reliable (Ref: par. .56–.57)

.A68 The engaging party’s refusal to furnish written representations constitutes a limitation on the scope of the assertion-based examination. Such refusal is often sufficient to preclude an unmodified opinion and, particularly with respect to the representations in paragraph .53, may cause a practitioner to disclaim an opinion or withdraw from the engagement when withdrawal is possible under applicable law or regulation. However, based on the nature of the representations not obtained or the circumstances of the refusal, the practitioner may conclude that a qualified opinion is appropriate.

.A69 Circumstances in which the practitioner may be unable to obtain one or more requested written representations from a responsible party that is not the engaging party include, for example, the following:

- When the engaging party does not have a relationship with the responsible party
- When the assertion-based examination is undertaken against the wishes of the responsible party, for example, when required by law or regulation

In these or other circumstances, the practitioner may need to reconsider whether the responsible party is able or willing to take responsibility for the subject matter. Additionally, the practitioner may not have access to the evidence to support a conclusion that the responsible party has taken responsibility for the subject matter. (Ref: par. .48, .72b, and .77)

.A70 After performing the procedures in items (a)–(b) of paragraph .56 the practitioner may determine that an oral representation may provide evidence needed with respect to the matter addressed by the representation, for example, when the engaging party is not the responsible party.

.A71 Even when the responsible party provides oral responses to the matters in paragraph .51, the practitioner may find it appropriate to consider whether there are significant concerns about the

competence, integrity, ethical values, or diligence of those providing the oral responses or whether the oral responses are otherwise not reliable and the potential effect, if any, on the practitioner's report.

.A72 Paragraph .10 provides an exception to the requirement for a written assertion when the engaging party is not the responsible party. Nonetheless, because the assertion is the representation called for by paragraph .51a, application of paragraph .57a requires the practitioner to obtain an oral assertion when a written assertion is not obtained. Paragraph .57b applies when the responsible party provides neither a written nor an oral assertion.

Other Information (Ref: par. .58)

.A73 Further actions that may be appropriate if the practitioner identifies a material inconsistency or becomes aware of a material misstatement of fact include, for example, the following:

- Requesting the appropriate party to consult with a qualified third party, such as the appropriate party'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 practitioner's report
- Withdrawing from the engagement, when withdrawal is possible under applicable laws and regulations.

.A74 Other information does not include information contained on the appropriate party's website. Websites are a means of distributing information and are not, themselves, documents for the purposes of paragraph .58.

Description of Criteria (Ref: par. .59)

.A75 The description of the criteria on which the subject matter or assertion is based is particularly important when there are significant differences among various criteria regarding how particular matters may be treated in the subject matter.

.A76 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.

Forming the Opinion (Ref: par. .60–.61)

.A77 The practitioner's professional judgment regarding what constitutes sufficient appropriate evidence is influenced by such factors as the following:

- The significance of a potential misstatement and the likelihood that it will have a material effect, individually or aggregated with other potential misstatements, on the subject matter or assertion
- 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
- The results of procedures performed, including whether such procedures identified specific misstatements
- The source and reliability of the available information

- The persuasiveness of the evidence
- The practitioner's understanding of the responsible party and its environment

.A78 An assertion-based 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. Examples of such information include the following:

- The extent of the misstatements 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.

.A79 In making the evaluation required by paragraph .61, the practitioner may consider whether additional disclosures are necessary to describe the subject matter, assertion, or criteria. Additional disclosures may, for example, include the following:

- The measurement or evaluation methods used when the criteria allow for choice among methods
- Significant interpretations made in applying the criteria in the engagement circumstances
- Subsequent events, depending on their nature and significance
- Whether there have been any changes in the measurement or evaluation methods used

.A80 Paragraph .61 does not require the practitioner to determine whether the presentation discloses all matters related to the subject matter, assertion, or criteria or all matters intended users may consider in making decisions based on the presentation.

Preparing the Practitioner's Report (Ref: par. .62)

.A81 Oral and other forms of expressing an opinion can be misunderstood without the support of a written practitioner's 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 report on the internet.

.A82 This section does not require a standardized format for reporting on all assertion-based examination engagements. Instead, it identifies the basic elements that the practitioner's report is to include. The report is 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 report.

.A83 The practitioner may choose to issue a report that contains only the minimum reporting elements included in paragraphs .63–.64 of this section or may issue a report that expands on or supplements those elements. In addition to the basic elements, the report may include information or explanations that are not intended to affect the practitioner's opinion, for example, detail about 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, a description of the procedures the practitioner performed,

and, in some cases, recommendations. The practitioner may find it helpful to consider the importance of providing such information to the information needs of the intended users. As required by paragraph .82, additional information, such as recommendations, is clearly separated from the practitioner's opinion and phrased in a manner that makes clear that it is not intended to detract from the opinion.

.A84 All of the following reporting options are available to a practitioner, except when the circumstances described in paragraph .76 exist:

| | | |
|---|------------|------------------------------------|
| <i>The practitioner's report may state that the practitioner examined</i> | <i>and</i> | <i>expresses an opinion on</i> |
| the subject matter | | the subject matter. |
| the responsible party's assertion | | the responsible party's assertion. |
| the responsible party's assertion | | the subject matter. |

Content of the Practitioner's Report

Title (Ref: par. .63a)

.A85 A title indicating that the practitioner's 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 the relevant ethical requirements regarding independence and, therefore, distinguishes the independent practitioner's report from reports issued by others.

Criteria (Ref: par. .63d)

.A86 The practitioner's report may include the criteria or refer to them if they are included in the subject matter presentation, in the assertion, or are otherwise readily available. It may be relevant in the circumstances to disclose the source of the criteria or the relevant matters discussed in paragraph .A79

Relevant Responsibilities (Ref: par. .63e-f)

.A87 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 an opinion about it.

.A88 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.

Statement About the Subject Matter and the Criteria (Ref: par. .63g(ii)(1))

.A89 In identifying the standards under which the engagement was performed, the practitioner may specify the AT-C section under which the engagement was performed, for example, AT-C section 320, *Reporting on an Examination of Controls Relevant to User Entities' Internal Control Over Financial Reporting*, of the attestation standards established by the AICPA.

.A90 The language in paragraph .63g(ii)(1) 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 63g(ii)(1) include, “to obtain reasonable assurance about whether

- the subject matter is presented in accordance with (or based on) the criteria, in all material respects.”
- the subject matter achieves the objectives, in all material respects.” (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 material items in the presentation of the subject matter achieve fair presentation.)

Description of the Nature of an Assertion-Based Examination Engagement (Ref: par. .63h)

.A91 A description of the nature of an assertion-based examination engagement may state, for example, the following:

- 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.
- An 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.

.A92 The practitioner may decide to more fully describe the practitioner’s responsibility, for example, to

- 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.

.A93 A practitioner may be requested to provide, in a separate section of the practitioner’s report, a description of the procedures performed and the results thereof in support of the practitioner’s opinion. The following factors are relevant when determining whether to include such a description in the report:

- Whether such a description is likely to overshadow the practitioner’s overall opinion or cause report users to misunderstand the opinion.
- Whether the parties making the request have an appropriate business need or reasonable basis for requesting the information. For example, the specified parties are required to maintain and monitor controls that either encompass or are dependent on controls that are the subject of an assertion-based examination and, therefore, need information about the

tests of controls to enable them to have a basis for concluding that they have met the requirements applicable to them.

- Whether the parties have an understanding of the nature and subject matter of the engagement and experience in using the information in such reports.
- Whether the practitioner’s procedures performed directly relate to the subject matter of the engagement.

The addition of procedures performed and the results thereof in a separate section of an assertion-based examination report may increase the potential for the report to be misunderstood when taken out of the context of the knowledge of the requesting parties. This potential for an increase in the risk of misunderstanding may lead the practitioner to add a restricted-use paragraph to the practitioner’s report.

Relevant Ethical Requirements (Ref: par. .63i)

.A94 Relevant ethical requirements consist of the AICPA Code of Professional Conduct together with rules of state boards of accountancy and applicable regulatory agencies that are more restrictive. When the AICPA Code of Professional Conduct applies, the practitioner’s other ethical responsibilities relate to the Principles of Professional Conduct (ET sec. 0.300).[†]

.A95 Relevant ethical requirements may exist in several different sources, such as ethical codes and additional rules and requirements within law and regulation. When independence and other relevant ethical requirements are contained in a limited number of sources, the practitioner may choose to name the relevant sources (for example, the name of the code, rule, or applicable regulation, or *Government Auditing Standards* promulgated by the Comptroller General of the United States) or may refer to a term that appropriately describes those sources.

Inherent Limitations (Ref: par. .63j)

.A96 In some cases, identification of specific inherent limitations is required by an AT-C section. For example, section 305, *Prospective Financial Information*, requires that the practitioner’s report include a statement indicating that the prospective results may not be achieved.⁴ To implement that requirement, the illustrative practitioner’s assertion-based examination report on a forecast in section 305 states, “There will usually be differences between the forecasted and actual results because events and circumstances frequently do not occur as expected, and those differences may be material.”⁵ When not explicitly required by an AT-C section, identification in the report of inherent limitations is based on the practitioner’s judgment.

Opinion (Ref: par. .63k)

.A97 The practitioner’s opinion can be worded either in terms of the subject matter and the criteria (for example, “In our opinion, the schedule of investment returns of XYZ Company for the year ended December 31, 20XX, is in accordance with [or based on] the ABC criteria set forth in Note 1, in all material respects.”) or in terms of an assertion made by the responsible party (for example, “In our opinion, management’s assertion that the accompanying schedule of investment returns of

[†] All ET sections can be found in AICPA *Professional Standards*.

⁴ Paragraph .31k of section 305, *Prospective Financial Information*.

⁵ Example 1 in paragraph .A43 of section 305.

XYZ Company for the year ended December 31, 20XX, is presented in accordance with [or based on] the ABC criteria set forth in Note 1 is fairly stated, in all material respects.”).

.A98 The language of the practitioner’s opinion in paragraph .63k 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 .63k(i) include the following:

- The subject matter is presented in accordance with (or based on) the criteria, in all material respects.
- The subject matter achieved the objectives, in all material respects (when the objectives are the criteria).
- The subject matter is free from material misstatement based on 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 material items in the presentation of the subject matter achieve fair presentation.)

.A99 A single practitioner’s report may cover more than one aspect of a subject matter or an assertion about the subject matter. When that is the case, the report may contain separate opinions or conclusions on each aspect of the subject matter or assertion (for example, examination level related to some aspects or assertions and review level related to others, or an unmodified opinion on some aspects or assertions and a modified opinion on others).

.A100 A practitioner may report on subject matter or an assertion at multiple dates or covering multiple periods during which criteria have changed (for example, a practitioner’s 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, in the written assertion about the subject matter, or in the report, even if the subject matter for the preceding date or period is not presented.

Location (Ref: par. .63m)

.A101 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.

Date (Ref: par. .63n)

.A102 Including the date of the practitioner’s report informs the intended users that the practitioner has considered the effect of the events that occurred up to that date on the subject matter and the report.

.A103 Because the practitioner expresses an opinion on the subject matter or assertion and the subject matter or assertion 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 the elements that the subject matter or assertion comprises, including any related notes, when applicable, have been prepared, and the responsible party has accepted responsibility for them.

Restricted-Use Paragraph (Ref: par. .10, .51, .64, and .65b–c)

.A104 A practitioner’s report for which the conditions in paragraph .64 do not apply need not include an alert that restricts its use. However, nothing in the attestation standards precludes a

practitioner from including such an alert in any practitioner's report or other practitioner's written communication.

.A105 A practitioner's report that is required by paragraph .64 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.

.A106 A practitioner may also issue a single combined practitioner's report that includes

- a. a practitioner's report that is required by paragraph .64 to include an alert that restricts its use, and
- b. a report that is 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 report may be limited to the report required by paragraph .64 to include such an alert. In such circumstances, the use of the general use report is not affected.

.A107 The written representations required by paragraph .51 include an assertion. If the engaging party is not the responsible party and the responsible party provides an oral assertion, rather than a written assertion, paragraph .64c calls for an alert that restricts the use of the practitioner's report to the engaging party.

.A108 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.

.A109 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 users of the practitioner's report to this fact and, therefore, that the report is intended solely for the information and use of the specified parties.

.A110 The alert that restricts the use of the practitioner's report is designed to avoid misunderstandings related to the use of the report, particularly if the report is taken out of the context in which the 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 report is not intended for distribution to parties other than those specified in the 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 report will be restricted and may obtain the responsible party's agreement that the responsible party and specified parties will not distribute such report to parties other than those identified therein. A practitioner is not responsible for controlling, and cannot control, distribution of the report after its release.

.A111 In some cases, a restricted-use practitioner's report filed with regulatory agencies is 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 a restricted-use report in which it is not named as a specified party.

Reference to the Practitioner's Specialist (Ref: par. .69)

.A112 The practitioner has sole responsibility for the opinion expressed, and that responsibility is not reduced by the practitioner's use of the work of a practitioner's specialist.

Modified Opinions (Ref: par. .70, .72, and .77)

.A113 The three types of modified opinions are a qualified opinion, an adverse opinion, and a disclaimer of opinion. The decision regarding which type of modified opinion is appropriate depends upon the following:

- a. The nature of the matter giving rise to the modification (that is, whether the subject matter of the engagement 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

.A114 A practitioner may express an unmodified opinion 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.

.A115 The term *pervasive* describes the effects on the subject matter of misstatements or the possible effects on the subject matter of misstatements, 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

- 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.

.A116 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 practitioner’s report to be issued.

| 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 opinion | Disclaimer of opinion |
| Subject matter is materially misstated. | Qualified opinion | Adverse opinion |

.A117 A scope limitation may arise from the following:

- a. Circumstances beyond the control of the appropriate party. 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 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.

.A118 The inability to obtain written representations from the responsible party ordinarily would result in a scope limitation. However, when the engaging party is not the responsible party, paragraph .52 enables the practitioner to make inquiries of the responsible party and, if the responsible party's oral responses enable the practitioner to conclude that the practitioner has sufficient appropriate evidence to form an opinion about the subject matter, paragraph .57a indicates this would not cause a scope limitation. Further, paragraph .57a requires that the practitioner's report in these circumstances contain an alert paragraph that restricts the use of the report to the engaging party.

.A119 The practitioner's decision to express a qualified opinion, disclaim an opinion, or withdraw from the engagement because of a scope limitation depends on an assessment of the effect of the omitted procedures on the practitioner's ability to express an opinion. 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.

.A120 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.

Responsible Party Refuses to Provide a Written Assertion (Ref: par. .86)

.A121 The following is an example of the disclosure required by paragraph .86:

Attestation standards established by the AICPA require that we request a written statement from [*identify the responsible party*] stating that [*identify the subject matter*] that we examined has been accurately measured or evaluated. We requested that [*identify the responsible party*] provide such a written statement but [*identify the responsible party*] refused to do so.

.A122 The practitioner's report discussed in paragraph .86 is appropriate only when the engagement is to report on the subject matter; it is not appropriate for a report on an assertion. When reporting on an assertion, the practitioner is required to obtain a written assertion from the responsible party.

.A123 If the responsible party's failure to provide the practitioner with written representations causes the practitioner to conclude that a scope limitation exists and, thus, qualify or disclaim an opinion, the practitioner need not restrict the use of the practitioner's report but is required by paragraph .71 to describe the matter that gave rise to the modified opinion. Paragraph .A104 notes, however, that the practitioner is not precluded from restricting the use of any report.

Communication Responsibilities (Ref: par. .87–.88)

.A124 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.

.A125 Disclosure of confidential information as defined in the Code of Professional Conduct requires the explicit consent of the engaging party or the responsible party, as appropriate. In circumstances in which such matters are identified, the practitioner may consider discussing with legal counsel or others prior to communicating or taking further action.

.A126 If the practitioner is performing an assertion-based examination engagement in accordance with *Government Auditing Standards*, the practitioner may be required to report on compliance with laws, regulations, and provisions of contracts or grant agreements as part of the assertion-based examination. The practitioner also may be required to communicate instances of noncompliance to appropriate oversight bodies and funding agencies.

Documentation (Ref: par. .89)

.A127 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 was reached.

.A128 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.

.A129 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.

.A130 Documentation ordinarily includes a record of the following:

- 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
- 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 engagement

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Exhibit — Illustrative Practitioner's Assertion-Based Examination Reports

The illustrative practitioner's assertion-based examination reports in this exhibit meet the applicable reporting requirements in paragraphs .62–.86. A practitioner may use alternative language in drafting an assertion-based examination report, provided that the language meets the applicable requirements in paragraphs .62–.86. The criteria for evaluating the subject matter in examples 1–3 and 5–6 have been determined by the practitioner to be suitable and available to all users of the practitioner's report; therefore, these practitioner's 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 practitioner's 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 .65 for the information to be included in a separate paragraph of the report that contains an alert that restricts the use of the report and paragraph .66 for the content of that paragraph when the engagement is also performed in accordance with *Government Auditing Standards*.)

Example 1: Practitioner’s Assertion-Based Examination Report on Subject Matter; Unmodified Opinion

The following is an illustrative practitioner’s report for an assertion-based examination engagement in which the practitioner has examined the subject matter and is reporting on the subject matter.

Independent Accountant’s Report

[Appropriate Addressee]

We have examined *[identify the subject matter, for example, the accompanying schedule of investment returns of XYZ Company for the year ended December 31, 20XX]*. XYZ Company’s management is responsible for *[identify the subject matter, for example, presenting the schedule of investment returns]* in accordance with (or based on) *[identify the criteria, for example, the ABC criteria set forth in Note 1]*. Our responsibility is to express an opinion on *[identify the subject matter, for example, the schedule of investment returns]* based on our examination.

Our examination was conducted in accordance with attestation standards established by the AICPA. Those standards require that we plan and perform the examination to obtain reasonable assurance about whether *[identify the subject matter, for example, the schedule of investment returns]* is in accordance with (or based on) the criteria, in all material respects. An examination involves performing procedures to obtain evidence about *[identify the subject matter, for example, the schedule of investment returns]*. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risks of material misstatement of *[identify the subject matter, for example, the schedule of investment returns]*, whether due to fraud or error. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

We are required to be independent and to meet our other ethical responsibilities in accordance with relevant ethical requirements relating to the engagement.

[Include a description of significant inherent limitations, if any, associated with the measurement or evaluation of the subject matter against the criteria.]

[Additional paragraphs may be added to emphasize certain matters relating to the attestation engagement or the subject matter.]

In our opinion, *[identify the subject matter, for example, the schedule of investment returns of XYZ Company for the year ended December 31, 20XX, or the schedule of investment returns referred to above]*, is presented in accordance with (or based on) *[identify the criteria, for example, the ABC criteria set forth in Note 1]*, in all material respects.

[Practitioner’s signature]

[Practitioner’s city and state]

[Date of practitioner’s report]

Example 2: Practitioner’s Assertion-Based Examination Report on an Assertion; Unmodified Opinion

The following is an illustrative practitioner's report for an assertion-based examination engagement in which the practitioner has examined the responsible party's assertion and is reporting on that assertion.

Independent Accountant's Report

[Appropriate Addressee]

We have examined management of XYZ Company's assertion that *[identify the assertion, including the subject matter and the criteria, for example, the accompanying schedule of investment returns of XYZ Company for the year ended December 31, 20XX, is presented in accordance with (or based on) the ABC criteria set forth in Note 1]*. XYZ Company's management is responsible for its assertion. Our responsibility is to express an opinion on management's assertion based on our examination.

Our examination was conducted in accordance with attestation standards established by the AICPA. Those standards require that we plan and perform the examination to obtain reasonable assurance about whether management's assertion is fairly stated, in all material respects. An examination involves performing procedures to obtain evidence about management's assertion. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risks of material misstatement of management's assertion, whether due to fraud or error. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

We are required to be independent and to meet our other ethical responsibilities in accordance with relevant ethical requirements relating to the engagement.

[Include a description of significant inherent limitations, if any, associated with the measurement or evaluation of the subject matter against the criteria.]

[Additional paragraphs may be added to emphasize certain matters relating to the attestation engagement or the subject matter.]

In our opinion, management's assertion that *[identify the assertion, including the subject matter and the criteria, for example, the accompanying schedule of investment returns of XYZ Company for the year ended December 31, 20XX, is presented in accordance with (or based on) the ABC criteria set forth in Note 1]* is fairly stated, in all material respects.

[Practitioner's signature]

[Practitioner's city and state]

[Date of practitioner's report]

Example 3: Practitioner's Assertion-Based Examination Report in Which the Practitioner Examines Management's Assertion and Reports Directly on the Subject Matter; Unmodified Opinion

The following is an illustrative practitioner's report for an assertion-based examination engagement in which the practitioner has examined the responsible party's assertion and is reporting directly on the subject matter.

Independent Accountant's Report

[Appropriate Addressee]

We have examined management of XYZ Company's assertion that *[identify the assertion, including the subject matter and the criteria, for example, the accompanying schedule of*

investment returns of XYZ Company for the year ended December 31, 20XX, is presented in accordance with (or based on) the ABC criteria set forth in Note I]. XYZ Company's management is responsible for its assertion. Our responsibility is to express an opinion on [identify the subject matter, for example, the accompanying schedule of investment returns of XYZ Company for the year ended December 31, 20XX], based on our examination.

Our examination was conducted in accordance with attestation standards established by the AICPA. Those standards require that we plan and perform the examination to obtain reasonable assurance about whether *[identify the subject matter, for example, the schedule of investment returns]* is presented in accordance with (or based on) the criteria, in all material respects. An examination involves performing procedures to obtain evidence about *[identify the subject matter, for example, the schedule of investment returns]*. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risks of material misstatement of *[identify the subject matter, for example, the schedule of investment returns]*, whether due to fraud or error. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

We are required to be independent and to meet our other ethical responsibilities in accordance with relevant ethical requirements relating to the engagement.

[Include a description of significant inherent limitations, if any, associated with the measurement or evaluation of the subject matter against the criteria.]

[Additional paragraphs may be added to emphasize certain matters relating to the attestation engagement or the subject matter.]

In our opinion, *[identify the subject matter, for example, the accompanying schedule of investment returns of XYZ Company for the year ended December 31, 20XX or the schedule of investment returns referred to above]* is presented in accordance with (or based on) *[identify the criteria, for example, the ABC criteria set forth in Note I]*, in all material respects.

[Practitioner's signature]

[Practitioner's city and state]

[Date of practitioner's report]

Example 4: Practitioner's Assertion-Based Examination Report on Subject Matter; Unmodified Opinion; Use of the Practitioner's Report Is Restricted to Specified Parties

The following is an illustrative practitioner's report for an assertion-based examination engagement in which the criteria are suitable but available only to specified parties; therefore, use of the 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. The practitioner has examined the subject matter and is reporting on the subject matter.

Independent Accountant's Report

[Appropriate Addressee]

We have examined *[identify the subject matter, for example, the number of widgets sold by XYZ Company to ABC Company (or tons of coal mined by XYZ Company... or gallons of gas sold in the United States by XYZ Company to ABC Company) during the year ended December 31, 20XX,]* to determine whether it has been calculated in accordance with (or based on) *[identify the criteria, for example, the agreement dated (date) between ABC Company and XYZ Company, as further described in Note I]*. XYZ Company's management is responsible for *[identify the subject matter,*

for example, the number of widgets sold] being calculated in accordance with [*identify the criteria, for example, the agreement dated (date) between ABC Company and XYZ Company, as further described in Note 1*]. Our responsibility is to express an opinion on [*identify the subject matter, for example, the number of widgets sold by XYZ Company to ABC Company (or tons of coal mined by XYZ Company... or gallons of gas sold in the United States by XYZ Company to ABC Company) during the year ended December 31, 20XX,*] based on our examination.

Our examination was conducted in accordance with attestation standards established by the AICPA. Those standards require that we plan and perform the examination to obtain reasonable assurance about whether [*identify the subject matter, for example, the number of widgets sold, tons of coal mined, or gallons of gas sold*] is in accordance with (or based on) the criteria, in all material respects. An examination involves performing procedures to obtain evidence about [*identify the subject matter, for example, the number of widgets sold, tons of coal mined, or gallons of gas sold*]. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risks of material misstatement of [*identify the subject matter, for example, the number of widgets sold by XYZ Company to ABC Company (or tons of coal mined by XYZ Company, or gallons of gas sold in the United States by XYZ Company to ABC Company)*], whether due to fraud or error. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

We are required to be independent and to meet our other ethical responsibilities in accordance with relevant ethical requirements relating to the engagement.

[Include a description of significant inherent limitations, if any, associated with the measurement or evaluation of the subject matter against the criteria.]

[Additional paragraphs may be added to emphasize certain matters relating to the attestation engagement or the subject matter.]

In our opinion, [*identify the subject matter, for example, the number of widgets sold by XYZ Company to ABC Company (or tons of coal mined by XYZ Company, or gallons of gas sold in the United States by XYZ Company to ABC Company) during the year ended December 31, 20XX,*] has been calculated in accordance with (or based on) [*identify the criteria, for example, the agreement dated (date) between ABC Company and XYZ Company, as further described in Note 1*], in all material respects.

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

[Practitioner's signature]

[Practitioner's city and state]

[Date of practitioner's report]

Example 5: Practitioner's Assertion-Based Examination Report on Subject Matter; Qualified Opinion

The following is an illustrative practitioner's report for an assertion-based examination engagement in which the practitioner expresses a qualified opinion because conditions exist that, individually or in combination, result in one or more material, but not pervasive, misstatements of the subject matter based on (or, in certain engagements, deviations from, exceptions to, or instances of noncompliance with) the criteria. The practitioner has examined the subject matter and is reporting on the subject matter. Paragraph .76 states, "If the practitioner has concluded that conditions exist that, individually or in combination, result in one or more material misstatements based on the criteria, the practitioner should modify the opinion and should express a qualified or

adverse opinion directly on the subject matter, not on the assertion, even when the assertion acknowledges the misstatement.”

Independent Accountant’s Report

[Appropriate Addressee]

We have examined *[identify the subject matter, for example, the accompanying schedule of investment returns of XYZ Company for the year ended December 31, 20XX]*. XYZ Company’s management is responsible for *[identify the subject matter, for example, presenting the schedule of investment returns]* in accordance with (or based on) *[identify the criteria, for example, the ABC criteria set forth in Note 1]*.

Our responsibility is to express an opinion on *[identify the subject matter, for example, the schedule of investment returns]* based on our examination. Our examination was conducted in accordance with attestation standards established by the AICPA. Those standards require that we plan and perform the examination to obtain reasonable assurance about whether *[identify the subject matter, for example, the schedule of investment returns]* is presented in accordance with (or based on) the criteria, in all material respects.

An examination involves performing procedures to obtain evidence about *[identify the subject matter, for example, the schedule of investment returns]*. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risks of material misstatement of *[identify the subject matter, for example, the schedule of investment returns]*, whether due to fraud or error. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our qualified opinion.

We are required to be independent and to meet our other ethical responsibilities in accordance with relevant ethical requirements relating to the engagement

[Include a description of significant inherent limitations, if any, associated with the measurement or evaluation of the subject matter against the criteria.]

[Additional paragraphs may be added to emphasize certain matters relating to the attestation engagement or the subject matter.]

Our examination disclosed *[describe conditions that, individually or in the aggregate, resulted in a material misstatement or deviation from the criteria]*.

In our opinion, except for the effects of the material misstatement *[or deviation from the criteria]* described in the preceding paragraph, *[identify the subject matter, for example, the accompanying schedule of investment returns of XYZ Company for the year ended December 31, 20XX, or the schedule of investment returns referred to above]*, is presented in accordance with (or based on) *[identify the criteria, for example, the ABC criteria set forth in Note 1]*, in all material respects.

[Practitioner’s signature]

[Practitioner’s city and state]

[Date of practitioner’s report]

Example 6: Practitioner’s Assertion-Based Examination Report; Practitioner Engaged to Report on Subject Matter; Disclaimer of Opinion Because of Scope Limitation

The following is an illustrative practitioner’s report for an assertion-based examination engagement in which the practitioner was engaged to report on the subject matter but is disclaiming an opinion because of a scope limitation. (See paragraphs .70–.86 and the related application guidance for reporting guidance when a scope limitation exists.)

Independent Accountant's Report

[Appropriate Addressee]

We were engaged to examine [identify the subject matter, for example, the accompanying schedule of investment returns of XYZ Company for the year ended December 31, 20XX], in accordance with (or based on) [identify the criteria, for example, the ABC criteria set forth in Note 1]. XYZ Company's management is responsible for [identify the subject matter, for example, presenting the schedule of investment returns] in accordance with (or based on) [identify the criteria, for example, the ABC criteria set forth in Note 1] (Our responsibility is to express an opinion on [identify the subject matter, for example, the schedule of investment returns] based on conducting the examination in accordance with attestation standards established by the AICPA.

We are required to be independent and to meet our other ethical responsibilities in accordance with relevant ethical requirements relating to the engagement

[The first sentence of the practitioner's report has been revised to state, "We were engaged to examine" rather than "We have examined." The standards under which the practitioner conducts an examination have been identified at the end of the second sentence of the report, rather than in a separate sentence in the second paragraph of the report.]

[The report should omit statements

- indicating what those standards require of the practitioner.*
- indicating that the practitioner believes the evidence obtained is sufficient and appropriate to provide a reasonable basis for the practitioner's opinion.*
- describing the nature of an examination engagement.]*

[Include a paragraph to describe scope limitations.]

Because of the limitation on the scope of our examination discussed in the preceding paragraph, the scope of our work was not sufficient to enable us to express, and we do not express, an opinion on whether [identify the subject matter, for example, the accompanying schedule of investment returns of XYZ Company for the year ended December 31, 20XX, or the schedule of investment returns referred to above] is in accordance with (or based on) [identify the criteria, for example, the ABC criteria set forth in Note 1], in all material respects.

[Practitioner's signature]

[Practitioner's city and state]

[Date of practitioner's report]

AT-C Section 206, *Direct Examination Engagements*

Introduction

- .01 This section contains performance and reporting requirements and application guidance for direct examination engagements.
- .02 In addition to complying with this section, a practitioner performing a direct examination engagement is required to comply with AT-C section 105, *Concepts Common to All Attestation Engagements*.^{*} This section addresses direct examination engagements in which the practitioner obtains reasonable assurance by measuring or evaluating the underlying subject matter against the criteria and performing other procedures to obtain sufficient appropriate evidence to express an opinion that conveys the results of that measurement or evaluation. In a direct examination engagement, the responsible party does not provide an assertion. (Ref: par. .A1–.A2)

Effective Date

- .03 This section is effective for practitioners' direct examination reports dated on or after June 15, 2022.

Objectives

- .04 In conducting a direct examination engagement, the objectives of the practitioner are to
 - a. obtain reasonable assurance by measuring or evaluating the underlying subject matter against the criteria and performing other procedures to obtain sufficient appropriate evidence,
 - b. express an opinion in a written report that conveys the results of the practitioner's measurement or evaluation, and
 - c. communicate as required by this AT-C section, in accordance with the results of the practitioner's procedures.

Requirements

Requirements in AT-C Section 205 to Be Adapted to a Direct Examination Engagement and Requirements in This Section That Differ From and Replace Related Requirements in AT-C Section 205 or Are in Addition to Requirements in AT-C Section 205

^{*} All AT-C sections can be found in AICPA *Professional Standards*.

- .05** In performing a direct examination engagement, the practitioner is not required to request a written assertion from the responsible party.¹ However, the practitioner is required to apply the other requirements in AT-C section 205 to a direct examination engagement unless
- a. the requirement cannot be applied as written because of the nature of a direct examination engagement, in which case, the practitioner should adapt and apply the requirement (Ref: par. .A3–.A7)
 - b. specified requirements in this section differ from and replace the related requirements in AT-C section 205. (These requirements are tailored to a direct examination engagement and identified in paragraph .06 of this section.) (Ref: par. .A8)

Requirements in This Section That Differ From and Replace Related Requirements in AT-C Section 205 or Are in Addition to Requirements in AT-C Section 205

- .06** When the practitioner performs examination procedures that address the following aspects of a direct examination engagement, the practitioner should apply the requirements in the paragraphs identified in items *a–d*, which differ from and replace the related requirements in AT-C section 205 or are in addition to the requirements in AT-C section 205. (Ref: par. .A9)
- a. Matters relevant to accepting or continuing a direct examination engagement (paragraphs .07–.08)
 - b. Terms of the engagement (paragraph .09)
 - c. The written representations that a practitioner is required to request of the responsible party and of the engaging party when the engaging party is not the responsible party (paragraphs .10–.11)
 - d. The required elements of the practitioner’s direct examination report (paragraph .12)

Acceptance and Continuance

Determining Whether to Perform a Direct Examination Engagement

- .07** Before accepting or continuing a direct examination engagement, the practitioner should obtain an understanding of the following matters through inquiries of the appropriate party: (Ref: par. .A10–.A14)
- a. The intended purpose of the engagement, how the practitioner’s report will be used, and why the engaging party wishes to engage the practitioner to perform a direct examination engagement
 - b. If the responsible party has not measured or evaluated the underlying subject matter against the criteria, why the responsible party has not done so
 - c. If the responsible party has measured or evaluated the underlying subject matter against the criteria, why the responsible party does not intend to provide an assertion

¹ Paragraph .10 of AT-C section 205, *Assertion-Based Examination Engagements*.

.08 Based on the information obtained from the following, the practitioner should evaluate whether to perform a direct examination engagement:

- a.* The inquiries in paragraph .07
- b.* Previous engagements performed for the engaging party, if any
- c.* Preliminary discussions with the engaging party, including discussion when agreeing upon the terms of the engagement

Terms of the Engagement

.09 Paragraph .07 of AT-C section 205 requires the practitioner to agree upon the terms of the engagement with the engaging party and that the agreement be in sufficient detail in an engagement letter or other suitable form of written agreement. In a direct examination engagement, the agreed-upon terms of the engagement should include the following: (Ref: par. .A15)

- a.* The objective and scope of the engagement
- b.* The responsibilities of the practitioner
- c.* A statement that the engagement will be conducted in accordance with attestation standards established by the AICPA
- d.* The responsibilities of the responsible party and the responsibilities of the engaging party, if different, including the following: (Ref: par. .A16)
 - i.* The responsible party is responsible for the underlying subject matter
 - ii.* The responsible party or engaging party, as applicable, is responsible for the following:
 - (1) Selecting the criteria for the measurement, evaluation, or disclosure of the underlying subject matter (Ref: par. .A17)
 - (2) Determining that such criteria are suitable, will be available to the intended users, and are appropriate for the purpose of the engagement
- e.* A statement about the inherent limitations of an examination engagement (Ref: par. .A18)
- f.* Identification of the criteria for the measurement, evaluation, or disclosure of the underlying subject matter
- g.* An acknowledgment that the engaging party agrees to provide the practitioner with a representation letter at the conclusion of the engagement

Written Representations

.10 The practitioner should request from the responsible party written representations in the form of a letter addressed to the practitioner. The representations should (Ref: par. .A19–.A20)

- a.* state that all known matters contradicting the measurement or evaluation of the underlying subject matter or the subject matter information, and any communication from regulatory agencies or others affecting the underlying subject matter or subject matter information have been disclosed to the practitioner, including communications received between the end of the period addressed by the practitioner’s report and the date of the practitioner’s report.

- b. acknowledge responsibility for
 - i. the underlying subject matter;
 - ii. selecting the criteria, when applicable; (Ref: par. .A17) and
 - iii. determining that such criteria are suitable, will be available to the intended users, and are appropriate for the purpose of the engagement.
- c. state that the responsible party has disclosed to the practitioner
 - i. all deficiencies in internal control relevant to the underlying subject matter of which the responsible party is aware;
 - ii. its knowledge of any actual, suspected, or alleged fraud or noncompliance with laws or regulations affecting the underlying subject matter or subject matter information; and
 - iii. other matters as the practitioner deems appropriate
- d. state that any known events occurring subsequent to the period (or point in time) of the underlying subject matter or subject matter information being reported on that would have a material effect on the underlying subject matter or subject matter information have been disclosed to the practitioner. (Ref: par. .A21)
- e. state that it has provided the practitioner with all relevant information and access as agreed upon in the terms of the engagement.

.11 When the engaging party is not the responsible party, the practitioner should request written representations from the engaging party in addition to those requested from the responsible party, in the form of a letter addressed to the practitioner. The representations should

- a. acknowledge that the responsible party is responsible for the underlying subject matter.
- b. acknowledge the engaging party's responsibility for selecting the criteria, when applicable.
- c. acknowledge the engaging party's responsibility for determining that such criteria are suitable, will be available to the intended users, and are appropriate for the purpose of the engagement.
- d. state that the engaging party is not aware of any material misstatements in the underlying subject matter or subject matter information.
- e. 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 information being reported on that would have a material effect on the subject matter information.
- f. address other matters as the practitioner deems appropriate.

Content of the Practitioner's Report

.12 The practitioner's report should include the following, unless the practitioner is disclaiming an opinion, in which case, items .12f–g should be omitted:

- a. A title that includes the word *independent*. (Ref: par. .A22)
- b. An appropriate addressee as required by the circumstances of the engagement.
- c. An identification or description of the subject matter information being reported on, including the point in time or period of time to which the measurement or evaluation of the underlying subject matter against the criteria relates.
- d. An identification of the criteria against which the underlying subject matter was measured

- or evaluated. (Ref: par. .A23)
- e.* An identification of (Ref: par. .A24)
 - i. the responsible party and its responsibility for the underlying subject matter.
 - ii. the practitioner's responsibility for
 - (1) measuring or evaluating the underlying subject matter against the criteria and performing other procedures,
 - (2) expressing an opinion that conveys the results of the practitioner's measurement or evaluation of the underlying subject matter against the criteria, based on the practitioner's examination, and
 - (3) presenting any subject matter information as part of the practitioner's measurement or evaluation, when applicable.
 - f.* A statement that
 - i. the practitioner's examination was conducted in accordance with attestation standards established by the AICPA.
 - ii. those standards require that the practitioner obtain reasonable assurance by measuring or evaluating the underlying subject matter against the criteria and performing other procedures to obtain sufficient appropriate evidence to express an opinion that conveys the result of that measurement or evaluation.
 - iii. the practitioner believes the evidence the practitioner obtained is sufficient and appropriate to provide a reasonable basis for the practitioner's opinion.
 - g.* A description of the nature of a direct examination engagement. (Ref: par. .A25–.A26)
 - h.* A statement that the practitioner is required to be independent and to meet the practitioner's other ethical responsibilities in accordance with relevant ethical requirements related to the examination engagement. (Ref: par. .A27–.A28)
 - i.* 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. .A29)
 - j.* The practitioner's opinion conveying the results of the practitioner's measurement or evaluation of the underlying subject matter against the criteria (Ref: par. .A30–.A32)
 - k.* The manual or printed signature of the practitioner's firm.
 - l.* The city and state where the practitioner's report is issued. (Ref: par. .A33)
 - m.* 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 opinion, including evidence that
 - i. the attestation documentation has been reviewed, and
 - ii. if applicable, the written presentation of the subject matter information has been prepared. [Ref par. .A34–.A35])

Application and Other Explanatory Material

Introduction (Ref: par. .01–.02)

.A1 The practitioner’s objective in a direct examination engagement is to obtain reasonable assurance, just as it is in an assertion-based examination engagement.

.A2 This section is not applicable to examination engagements related to subject matter for which other AT-C sections require the application of AT-C section 205, *Assertion-Based Examination Engagements*. Those sections are as follows: (Ref: par. .02)

- a. AT-C section 305, *Prospective Financial Information*
- b. AT-C section 310, *Reporting on Pro Forma Financial Information*
- c. AT-C section 315, *Compliance Attestation*
- d. AT-C section 320, *Reporting on an Examination of Controls at a Service Organization Relevant to User Entities’ Internal Control Over Financial Reporting*
- e. AT-C section 395, *Management’s Discussion and Analysis*

Requirements in AT-C Section 205 to Be Adapted to a Direct Examination Engagement and Requirements in This Section That Differ From and Replace Related Requirements in AT-C Section 205 or Are in Addition to Requirements in AT-C Section 205 (Ref: par. .05 and .06)

.A3 In a direct examination engagement, obtaining reasonable assurance is the benchmark the practitioner uses for determining how and the extent to which AT-C section 205 may need to be adapted.

.A4 The nature of a direct examination engagement is one in which the responsible party does not provide an assertion, and the extent to which the responsible party has measured or evaluated the underlying subject matter against the criteria may vary.

.A5 An example of a requirement in AT-C section 205 that the practitioner may be unable to apply, as written, is the requirement in paragraph .30a of AT-C section 205 to evaluate whether the responsible party has appropriately applied the requirements of the criteria to any estimated amounts. In a direct examination engagement, the responsible party may not have fully applied the criteria to the underlying subject matter to develop the estimate. Therefore, the practitioner would be unable to evaluate the responsible party’s method for making the estimate. However, the practitioner might adapt the requirement by determining the method used by other entities in the same industry to make the estimate and then using that method in developing the estimate.

.A6 Although the practitioner could not evaluate the appropriateness of the responsible party’s method for making the estimate, as required by AT-C section 205, the practitioner, as part of developing the estimate, would be able to perform other procedures that are relevant to making the estimate, such as obtaining an understanding of

- how the responsible party’s information system captures and records data and other information that provides a basis for the estimate (that is, underlying subject matter).
- the relevant controls over that data and other information.
- the factors both internal and external to the entity that affect the estimate.

Obtaining an understanding of these matters also assists the practitioner in determining the appropriate method to use for making the estimate, assessing the accuracy and completeness of the data, and considering other relevant information to be used in developing the estimate.

.A7 Paragraph .13 of AT-C section 205 requires the practitioner to develop a plan that includes a description of the

- nature, timing, and extent of planned risk assessment procedures and further procedures.
- other planned procedures that are required to be carried out so that the engagement complies with the attestation standards.

Applying paragraph .13 to a direct examination engagement may increase the extent or change the nature of the work the practitioner needs to perform because in a direct examination engagement the practitioner measures or evaluates the underlying subject matter against the criteria and performs other procedures to obtain reasonable assurance. In an assertion-based examination engagement, the practitioner tests subject matter information prepared by the responsible party. Also, in a direct examination engagement, risk assessment procedures may primarily address

- the accuracy and completeness of the underlying subject matter,
- the practitioner’s competence and experience with the underlying subject matter and criteria, and
- the complexity of the measurement or evaluation of the underlying subject matter against the criteria.

.A8 To provide context for the requirements identified in this section or to present a complete list of requirements for a particular aspect of a direct examination engagement, some paragraphs in this section repeat requirements that are the same as those for an assertion-based examination engagement. (Ref: par. .05b)

Requirements in This Section That Differ From and Replace Related Requirements in AT-C Section 205 or Are in Addition to Requirements in AT-C Section 205 (Ref: par. .06)

.A9 The following table identifies paragraphs in this section that contain requirements that differ from and replace related requirements in AT-C section 205 or are in addition to the requirements in AT-C section 205:

| Aspect of a Direct Examination | Paragraphs in AT-C Section 206 That Contain Requirements That Differ From and Replace Related Requirements in AT-C Section 205 or Are in Addition to Requirements in AT-C Section 205 | Paragraphs in AT-C Section 205 That Are Replaced by Paragraphs in AT-C Section 206 |
|---------------------------------------|--|---|
| Acceptance or Continuance | .07–.08 | |

| | | |
|---------------------------------|---------|-------------|
| | | |
| Terms of the Engagement | .09 | .08 |
| Written Representations | .10–.11 | .51 and .53 |
| Required Elements of the Report | .12 | .63 |

Acceptance and Continuance (Ref: par. .07–.08)

Determining Whether to Perform a Direct Examination Engagement

.A10 In some cases, the responsible party may be unable to provide a written assertion because the entity does not have the personnel or systems needed to establish a reasonable basis for such an assertion. In other cases, the responsible party may simply wish to engage the practitioner to measure or evaluate the underlying subject matter against the criteria, or an engaging party other than the responsible party may engage the practitioner to do so.

.A11 In determining whether to accept or continue a direct examination engagement, the practitioner may inquire whether the responsible party is required by law, regulation, or contract to measure or evaluate the underlying subject matter against the criteria or provide a written assertion regarding the outcome of that measurement or evaluation.

.A12 If the responsible party states that it has measured or evaluated the underlying subject matter against the criteria, the practitioner may request the results of that measurement or evaluation.

.A13 The responsible party may not intend to provide an assertion because, for example, the responsible party performed only a partial measurement or evaluation of the underlying subject matter but not to an extent that would provide a reasonable basis for an assertion.

.A14 A practitioner may be requested to change an assertion-based examination engagement, in accordance with AT-C section 205, to a direct examination engagement. A change from an assertion-based examination engagement to a direct examination engagement would not be considered a change to a lower level of service as described in paragraph .32 of AT-C section 105 because both services entail obtaining reasonable assurance and result in an examination report.

Terms of the Engagement (Ref: par. .09)

.A15 A practitioner may further describe the terms of the engagement by adding the following items to the engagement letter or other suitable form of written agreement:

- a. A statement that a direct examination is designed to obtain reasonable assurance about whether the subject matter information is free from material misstatement
- b. A statement that the objective of a direct examination is
 - i. to obtain reasonable assurance by measuring or evaluating the underlying subject matter against the criteria and performing other procedures to obtain sufficient appropriate evidence

- ii. to express an opinion in a written practitioner’s report that conveys the results of the practitioner’s measurement or evaluation of the underlying subject matter against the criteria

.A16 Situations may exist in which the responsible party is not the engaging party and, as such, the responsibilities of each party may differ. For example, when the responsible party is not the engaging party, the engaging party, rather than the responsible party, may be responsible for selecting the criteria.

.A17 The engaging party may request that the practitioner recommend, develop, or assist in developing the criteria for the engagement. Regardless of whether the practitioner recommends, develops, or assists in developing the criteria for the engagement, the engaging party is required to determine that the criteria are suitable, will be available to the intended users, and are appropriate for the purpose of the engagement.

.A18 If relevant, a statement about the inherent limitations of an examination engagement may indicate that “because of the inherent limitations of an examination engagement, together with the inherent limitations of internal control, an unavoidable risk exists that some material misstatements may not be detected, even though the examination is properly planned and performed in accordance with the attestation standards.”

Written Representations (Ref: par. .10)

.A19 Written confirmation of oral representations reduces the possibility of misunderstandings between the practitioner and the responsible party. The person 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, which may vary by entity, reflecting influences such as size and ownership characteristics.

.A20 Representations by the responsible party cannot replace other evidence the practitioner could reasonably expect to be available. Although written representations provide 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.

.A21 A discussion of what is considered a material effect on the underlying subject matter or subject matter information may be included explicitly in the representation letter in qualitative or quantitative terms.

Content of the Practitioner’s Report

Title (Ref: par. .12a)

.A22 A title indicating that the practitioner’s 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 the relevant ethical requirements regarding independence and, therefore, distinguishes the independent practitioner’s report from reports issued by others.

Criteria (Ref: par. .12d)

.A23 The practitioner’s report may include the criteria or refer to them if they are included in the subject matter information or are otherwise readily available. It may be relevant in the

circumstances to disclose the source of the criteria or the relevant matters discussed in paragraph .A86 of AT-C section 205.

Relevant Responsibilities (Ref: par. .12e)

.A24 Identifying relative responsibilities informs the intended users that the responsible party is responsible for the underlying subject matter, and the practitioner's role is to obtain reasonable assurance by measuring or evaluating the underlying subject matter against the criteria, and performing other procedures to obtain sufficient appropriate evidence to express an opinion that conveys the results of that measurement or evaluation.

Description of the Nature of a Direct Examination Engagement (Ref: par. .12g)

.A25 A description of the nature of a direct examination engagement may state, for example, that

- a direct examination involves measuring or evaluating the underlying subject matter against the criteria and performing other procedures to obtain sufficient appropriate evidence.
- in making an assessment of the risks of material misstatement, the practitioner considered and obtained an understanding of internal control relevant to the underlying 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.
- 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 information, whether due to fraud or error.

.A26 A practitioner may be requested to provide in a separate section of the practitioner's report a description of the procedures performed and the results thereof in support of the practitioner's opinion. The following factors are relevant when determining whether to include such a description in the report:

- Whether such a description is likely to overshadow the practitioner's overall opinion or cause report users to misunderstand the opinion
- Whether the parties making the request have an appropriate business need or reasonable basis for requesting the information (for example, the specified parties are required to maintain and monitor controls that either encompass or are dependent on controls that are the subject of a direct examination and, therefore, need information about the tests of controls to enable them to have a basis for concluding that they have met the requirements applicable to them)
- Whether the parties have an understanding of the nature and underlying subject matter of the engagement and experience in using the information in such reports

Relevant Ethical Requirements (Ref: par. .12h)

.A27 Relevant ethical requirements consist of the AICPA Code of Professional Conduct together with rules of state boards of accountancy and applicable regulatory agencies that are more restrictive. When the AICPA Code of Professional Conduct applies, the practitioner’s other ethical responsibilities relate to the “Principles of Professional Conduct” (ET sec. 0.300).²

.A28 Relevant ethical requirements may exist in several different sources, such as ethical codes and additional rules and requirements within law and regulation. When independence and other relevant ethical requirements are contained in a limited number of sources, the practitioner may choose to name the relevant sources (for example, the name of the code, rule, or applicable regulation, or *Government Auditing Standards* promulgated by the Comptroller General of the United States, or may refer to a term that appropriately describes those sources.

Inherent Limitations (Ref: par. .12i)

.A29 When not explicitly required by an AT-C section, identification in the report of inherent limitations is based on the practitioner’s judgment.

Opinion (Ref: par. .12j)

.A30 The following are examples of language the practitioner may use in the opinion to convey the results of the practitioner’s measurement or evaluation of the underlying subject matter against the criteria, as required by paragraph .12j:

- The underlying subject matter is presented in accordance with (or based on) the criteria, in all material respects.
- The subject matter information is free from material misstatement based on the criteria.
- The subject matter information 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 information relates to whether the measurement, recognition, presentation, and disclosure of all material items in the presentation of the subject matter achieve fair presentation.)

.A31 A single practitioner’s report may cover more than one aspect of subject matter information. When that is the case, the report may contain separate opinions or conclusions on each aspect of the subject matter information.

.A32 A practitioner may report on subject matter information at multiple dates or covering multiple periods during which criteria have changed (for example, a practitioner’s 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 information, or in the report, even if the subject matter for the preceding date or period is not presented.

² All ET sections can be found in AICPA *Professional Standards*.

Location (Ref: par. .12l)

.A33 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.

Date (Ref: par. .12m)

.A34 Including the date of the practitioner's report informs the intended users that the practitioner has considered the effect of the events that occurred up to that date on the subject matter information and the report.

.A35 The practitioner is not in a position to conclude that sufficient appropriate evidence has been obtained until evidence is obtained that all the elements that the subject matter information comprises, including any related notes, when applicable, have been prepared.

.A36

Exhibit — Illustrative Direct Examination Reports

The illustrative practitioner’s direct examination reports in this exhibit meet the applicable reporting requirements in paragraph .12 of this section. A practitioner may use alternative language in drafting a direct examination report, provided that the language meets the applicable requirements in paragraph .12 of this section.

Example 1

Circumstances include the following:

The practitioner was engaged to

- measure the rates of return (subject matter information) on XYZ Company’s investment transactions during the year ended December 31, 20XX (the underlying subject matter) based on specified criteria
- present the rates of return on the investment transactions in a schedule of investment returns (subject matter information).

Independent Accountant’s Report

[Appropriate Addressee]

We have examined¹ *[identify the underlying subject matter, for example, the investment transactions of XYZ Company during the year ended December 31, 20XX]*. XYZ Company’s management is responsible for *[identify the underlying subject matter, for example, its investment transactions during the year ended December 31, 20XX]* and maintaining a record of those transactions. Our responsibility is to obtain reasonable assurance by measuring (or evaluating) *[identify the underlying subject matter, for example, the investment transactions of XYZ Company during the year ended December 31, 20XX]* against *[identify the criteria, for example, the ABC criteria set forth in Note 1 of the accompanying schedule of investment returns]* to determine *[identify the subject matter information, for example, the rates of return on those investment transactions]* and performing other procedures to obtain sufficient appropriate evidence to express an opinion that conveys the results of our measurement (or evaluation) based on our examination. We have presented the results of our measurement in the accompanying schedule of investment returns.

Our examination was conducted in accordance with the attestation standards for a direct examination engagement established by the AICPA. Those standards require that we obtain reasonable assurance by measuring (or evaluating) *[identify the underlying subject matter, for*

¹ The practitioner may revise the first sentence of the report to read “We have directly examined...” or “We have performed a direct examination of...” or similar.

example, the investment transactions of XYZ Company during the year ended December 31, 20XX] against *[identify the criteria, for example, the ABC criteria set forth in Note 1 of the accompanying schedule of investment returns]* and performing other procedures to obtain sufficient appropriate evidence to express an opinion that conveys the results of our measurement or evaluation of *[identify the underlying subject matter, for example, the investment transactions of XYZ Company during the year ended December 31, 20XX]*. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risks of material misstatement of *[identify the subject matter information, for example, the rates of return on those investment transactions for the year ended December 31, 20XX, as presented in the schedule of investment returns]*, whether due to fraud or error. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

We are required to be independent of *[identify the responsible party, for example, XYZ Company]* and to meet our other ethical responsibilities, in accordance with relevant ethical requirements relating to our examination engagement.

[Include a description of significant inherent limitations, if any, associated with the measurement or evaluation of the underlying subject matter against the criteria.]

[Additional paragraphs may be added to emphasize certain matters relating to the attestation engagement, the underlying subject matter, or the subject matter information.]

In our opinion, *[identify the subject matter information, for example, the rates of return on the investment transactions of XYZ Company during the year ended December 31, 20XX included in the accompanying schedule of investment returns of XYZ Company for the year ended December 31, 20XX,]* are fairly presented in accordance with (or based on) *[identify the criteria, for example, the ABC criteria set forth in Note 1]*, in all material respects.

[Signature of the practitioner's firm]

[City and state where the practitioner's report is issued]

[Date of the practitioner's report]

Example 2

Circumstances include the following:

The practitioner was engaged to

- evaluate a daycare center's safety practices during the year ended December 31, 20XX and implementation of those practices (the underlying subject matter) based on criteria established by an educational organization.
- express an opinion (subject matter information) about whether the daycare center's safety practices and implementation of those practices were in accordance with the criteria

Independent Accountant's Report

[Appropriate Addressee]

We have examined¹ [identify the underlying subject matter, for example, *Indulgent Daycare Center's safety practices and its implementation of those practices during the year ended December 31, 20XX*]. Indulgent Daycare Center's management is responsible for [identify the underlying subject matter, for example, *its safety practices and its implementation of those practices*]. Our responsibility is to obtain reasonable assurance by measuring (or evaluating) [identify the underlying subject matter, for example, *Indulgent Daycare Center's safety practices and its implementation of those practices during the year ended December 31, 20XX*] against [identify the criteria, for example, *XYZ Educator's Best Safety Practices for Daycare Centers*] and performing other procedures to obtain sufficient appropriate evidence to express an opinion that conveys the results of our measurement (or evaluation) based on our examination.

Our examination was conducted in accordance with the attestation standards for a direct examination engagement established by the AICPA. Those standards require that we obtain reasonable assurance by measuring (or evaluating) [identify the underlying subject matter, for example, *Indulgent Daycare Center's safety practices and its implementation of those practices during the year ended December 31, 20XX*] against [identify the criteria, for example, *XYZ Educator's Best Safety Practices for Daycare Centers*] and performing other procedures to obtain sufficient appropriate evidence to express an opinion that conveys the results of our measurement or evaluation of [identify the underlying subject matter, for example, *Indulgent Daycare Center's safety practices and its implementation of those practices during the year ended December 31, 20XX*]. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risks that [identify the underlying subject matter, for example, *Indulgent Daycare Center's safety practices and its implementation of those practices*] were not in accordance with [identify the criteria, for example, *XYZ Educator's Best Safety Practices for Daycare Centers*] in all material respects, whether due to fraud or error. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

We are required to be independent of [identify the responsible party, for example, *Indulgent Daycare Center*], and to meet our other ethical responsibilities, in accordance with relevant ethical requirements relating to our examination engagement.

[Include a description of significant inherent limitations, if any, associated with the measurement or evaluation of the underlying subject matter against the criteria.]

[Additional paragraphs may be added to emphasize certain matters relating to the attestation engagement, the underlying subject matter, or the subject matter information.]

In our opinion, [identify the underlying subject matter, for example, *Indulgent Daycare Center's safety practices and its implementation of those practices during the year ended December 31, 20XX*], were in accordance with (or based on) [identify the criteria, for example, *XYZ Educator's Best Safety Practices for Daycare Centers*], in all material respects.

¹ The practitioner may revise the first sentence of the report to read "We have directly examined..." or "We have performed a direct examination of..." or similar.

[Signature of the practitioner's firm]

[City and state where the practitioner's report is issued]

[Date of the practitioner's report]