



**Agenda Item 2A**

**Reporting on an Examination of Controls at a Service Organization Relevant to User Entities’  
Internal Control Over Financial Reporting  
September 30, 2015 Draft Marked from the July 21, 2015 Draft**

Introduction, Effective Date, Objective, Definition, and Requirement Paragraphs	Application and Other Explanatory Material Paragraphs
<b>Introduction</b>	<b>Introduction</b>
<p><b>8.1.</b> This chapter of Statements on Standards for Attestation Engagements (<del>SSAEs</del> or attestation standards) contains performance and reporting requirements and application guidance for a service auditor examining controls at organizations that provide services to user entities when those controls are likely to be relevant to user entities’ internal control over financial reporting. It complements AU-C section 402, <i>Audit Considerations Relating to an Entity Using a Service Organization</i> (AICPA, <i>Professional Standards</i>), in that reports prepared in accordance with this chapter may provide appropriate evidence under AU-C section 402. (Ref: par. 8.A1)</p>	<p><b>8.A1.</b> Controls related to a service organization’s operations and compliance objectives may be relevant to a user entity’s internal control over financial reporting. Such controls may pertain to assertions about presentation and disclosure relating to account balances, classes of transactions or disclosures, or may pertain to evidence that the user auditor evaluates or uses in applying auditing procedures. For example, a payroll processing service organization’s controls related to the timely remittance of payroll deductions to government authorities may be relevant to a user entity because late remittances could incur interest and penalties that would result in a liability to the user entity. Similarly, a service organization’s controls over the acceptability of investment transactions from a regulatory perspective may be considered relevant to a user entity’s presentation and disclosure of transactions and account balances in its financial statements. (Ref: par. 8.1)</p>
<p><b>8.2.</b> In addition to complying with this chapter, a practitioner is required to comply with chapter 1, “Concepts Common to All Attestation Engagements,” and chapter 2, “Examination Engagements,” <del>of the attestation standards</del>. In some cases, this chapter repeats or refers to requirements in chapters 1 and 2 when describing those requirements in</p>	<p><b>8.A2.</b> Chapter 1 requires the practitioner to consider applicable interpretive publications when planning and performing an attestation engagement.<sup>1</sup> Additional interpretive guidance for a practitioner examining controls at a service organization relevant to user entities’ internal control over financial reporting is provided in the AICPA guide</p>

<sup>1</sup> Paragraph 1.21 of chapter 1, “Concepts Common to All Attestation Engagements.”

<p>the context of examinations that address controls at a service organization likely to be relevant to user entities' internal control over financial reporting. Although not all of the requirements in chapters 1 and 2 are repeated or referred to in this chapter, the practitioner is responsible for complying with all of the requirements in chapters 1 and 2. (Ref: par. 8.A2)</p>	<p><i>Service Organizations: Reporting on Controls at a Service Organization Relevant to User Entities' Internal Control Over Financial Reporting.</i>                  (Ref: par. 8.2)</p>
<p><a href="#">8.3. 8-37 Chapter 2 indicates that when performing an attestation engagement, a practitioner may report directly on the subject matter or on management's assertion.<sup>2</sup> For engagements conducted under this chapter, the service auditor reports directly on the subject matter.</a>  <b>Moved here from old par. 8.37</b></p>	
<p><b>8.3.8.4.</b> The focus of this chapter is on controls at service organizations likely to be relevant to user entities' internal control over financial reporting. The guidance herein also may be helpful to a practitioner performing an engagement under chapter 2, to report on controls at a service organization</p> <p>a. other than those that are likely to be relevant to user entities' internal control over financial reporting (for example, controls that affect user entities' compliance with specified requirements of laws, regulations, rules, contracts, or grants, or controls that affect user entities' production or quality control). Chapter 7, "Compliance Attestation," <del>of the attestation standards,</del> is applicable if a practitioner is performing agreed-upon procedures related to an entity's internal control over compliance with specified requirements. Chapter 2 is applicable if a practitioner is examining an entity's controls over compliance with specified requirements. (Ref: par. 8.A3-8.A4)</p> <p>b. when management of the service organization does not provide an assertion about the suitability of the design of controls because it is not responsible for the design of the controls (for example, when</p>	<p><b>8.A3.</b> Paragraph <del>8-38.4</del> refers to other engagements the practitioner may perform and report on under chapter 2 when reporting on controls at a service organization. Paragraph <del>8-38.4</del> is not, however, intended to</p> <ul style="list-style-type: none"> <li>• alter the definitions of a <i>service organization</i> and <i>service organization's system</i> in paragraph <del>8-78.8</del> to permit reports issued under this chapter to include in the description of the service organization's system aspects of their services (including relevant control objectives and related controls) not likely to be relevant to user entities' internal control over financial reporting, or</li> <li>• permit a report to be issued that combines reporting under this chapter on a service organization's controls that are likely to be relevant to user entities' internal control over financial reporting, with reporting under chapter 2 on controls that are not likely to be relevant to user entities' internal control over financial reporting. (Ref: par. <del>8-38.4a</del>)</li> </ul>

<sup>2</sup> Paragraph 2.10 of chapter 2, "Examination Engagements."

<p>the controls have been designed by the user entity or the design is stipulated in a contract between the user entity and the service organization). (Ref: par. 8.A5)</p>	
	<p><b>8.A4.</b> When a service auditor conducts an engagement under chapter 2 to report on controls at a service organization other than those controls likely to be relevant to user entities' internal control over financial reporting, and the service auditor intends to use the guidance in this chapter in planning and performing that engagement, the service auditor may encounter matters that differ significantly from those associated with engagements to report on a service organization's controls likely to be relevant to user entities' internal control over financial reporting. The following are examples of such matters:</p> <ul style="list-style-type: none"> <li>• Identification of suitable and available criteria, as prescribed in chapter 1, for evaluating the fairness of presentation of management's description of the service organization's system and the suitability of the design and the operating effectiveness of the controls<sup>3</sup></li> <li>• Identification of appropriate control objectives, and the basis for evaluating the reasonableness of the control objectives in the circumstances of the particular engagement</li> <li>• Identification of the intended users of the report and the manner in which they intend to use the report</li> <li>• Relevance and appropriateness of the definitions in paragraph 8-78.8, many of which specifically relate to internal control over financial reporting</li> </ul>

<sup>3</sup> Paragraph 1.25b(ii) of chapter 1.

	<ul style="list-style-type: none"> <li>• Application of references to auditing standards (AU-C sections) that are intended to provide the service auditor with guidance relevant to internal control over financial reporting</li> <li>• Application of the concept of materiality in the circumstances of the particular engagement</li> <li>• Developing the language to be used and identifying the elements to be included in an examination report, as discussed in chapter 2<sup>4</sup> (Ref: par. <del>8-38.4a</del>)</li> </ul>
	<p><b>8.A5.</b>In some circumstances, management of the service organization may not be in a position to assert that the controls are suitably designed, for example, because the controls have been designed by management of the user entity. If management is unable to assert that the controls are suitably designed management would also be precluded from asserting that the controls are operating effectively because of the inextricable link between the suitability of the design of controls and their operating effectiveness. The absence of an assertion with respect to the suitability of design of controls would preclude the service auditor from expressing an opinion on the operating effectiveness of controls. As an alternative, the practitioner may report under chapter 2 on whether the controls were operating as described or may perform agreed-upon procedures under chapter 4. (Ref: par. <del>8-38.4b</del>)</p>
<p><del>8-4-8.5.</del> In addition to performing an examination of a service organization's controls, a service auditor may be engaged to (a) examine and report on a user entity's transactions or balances maintained by a service organization, or (b) perform and report under chapter 4, "Agreed-Upon Procedures Engagements," <del>of the attestation standards,</del> the results of agreed-upon procedures related to the controls of a service organization or to transactions or balances of a user entity maintained by a service organization. However, these engagements are not addressed in this chapter.</p>	

<sup>4</sup> Paragraphs ~~2.622-64–2.652-64~~ of chapter 2.

<p><b>Effective Date</b></p> <p><u>8.5.8.6.</u> This chapter is effective for service auditors' reports dated on or after May 1, 2017.</p>	
<p><b>Objectives</b></p> <p><u>8.6.8.7.</u> The objectives of the service auditor are to</p> <ul style="list-style-type: none"> <li>a. obtain reasonable assurance about whether, in all material respects, based on <u>the suitable</u> criteria,                     <ul style="list-style-type: none"> <li>i. management's description of the service organization's system fairly presents the service organization's system that was designed and implemented throughout the specified period (or in the case of a type 1 report, as of a specified date)</li> <li>ii. the controls related to the control objectives stated in management's description of the service organization's system were suitably designed to provide reasonable assurance that the control objectives would be achieved if the controls operated effectively throughout the specified period (or in the case of a type 1 report, as of a specified date).</li> <li>iii. when included in the scope of the engagement, the controls operated effectively to provide reasonable assurance that the control objectives stated in management's description of the service organization's system were achieved throughout the specified period.</li> </ul> </li> <li>b. express an opinion in a written report about the matters in paragraph <u>8.68.7a.</u></li> </ul>	
<p><b>Definitions</b></p>	<p><b>Definitions</b></p>
<p><u>8.7.8.8.</u> For the purposes of this chapter, the following definitions apply:</p>	

- a. **Carve-out method.** Method of addressing the services provided by a subservice organization, whereby management's description of the service organization's system identifies the nature of the services performed by the subservice organization and excludes from the description and from the scope of the service auditor's engagement the subservice organization's relevant control objectives and related controls. (Ref: par. [8.A378.A36](#))
- b. **Complementary subservice organization controls.** Controls that management of the service organization assumes, in the design of the service organization's system, will be implemented by the subservice organizations, and are necessary to achieve the control objectives stated in management's description of the service organization's system.
- c. **Complementary user entity controls.** Controls that management of the service organization assumes, in the design of the service organization's system, will be implemented by user entities, and are necessary to achieve the control objectives stated in management's description of the service organization's system. (Ref: par. [8.A6](#))
- d. **Control objectives.** The aim or purpose of specified controls at the service organization. Control objectives address the risks that controls are intended to mitigate.
- e. **Controls at a service organization.** The policies and procedures at a service organization likely to be relevant to user entities' internal control over financial reporting. These policies and procedures are designed, implemented, and documented by the service organization to provide reasonable assurance about the achievement of the control objectives relevant to the services covered by the service auditor's report. (Ref: par. [8.A7](#))

**8.A6.** Complementary user entity controls are specific and relevant to the services provided by the service organization applicable to user entities' internal control over financial reporting. (Ref: par. [8-78.8c](#))

**8.A7.** The policies and procedures referred to in the definition of *controls at a service organization* in paragraph [8-78.8e](#) include aspects of [the information and communications component of](#) user entities' [internal control information systems](#) maintained by the service organization and control activities related to ~~the~~[these](#) information [and communications components](#)~~systems~~, and may also include aspects of one or more of the other components of internal control at a service organization. For example, the definition of *controls at a service organization* may include

- f. Deficiency in a control at a service organization relevant to user entities' internal control over financial reporting.** A deficiency in a control at a service organization relevant to user entities' internal control over financial reporting (control) exists when the design or operation of the control does not allow management or employees of the service organization, in the normal course of performing their assigned functions, to prevent or detect and correct, on a timely basis, ~~errors-deviations in the design or operating effectiveness of the service organization's controls~~ that could result in misstatements in the user entities' financial statements ~~on a timely basis~~. A deficiency in design exists when (a) a control necessary for the service organization to meet a control objective is missing, or (b) an existing control is not properly designed so that, even if the control operates as designed, the control objective would not be met. A deficiency in operation exists when a properly designed control does not operate as designed or when the person performing the control does not possess the necessary authority or competence to perform the control effectively.
- g. Inclusive method.** Method of addressing the services provided by a subservice organization whereby management's description of the service organization's system includes a description of the nature of the services provided by the subservice organization as well as the subservice organization's relevant control objectives and related controls. (Ref: par. ~~8-108.11~~ and ~~8-A378.A36~~)

aspects of the service organization's control environment, risk assessment, monitoring activities, and control activities when they relate to the services provided. Such definition does not, however, include controls at a service organization that are not related to the achievement of the control objectives stated in management's description of the service organization's system, for example, controls related to the preparation of the service organization's own financial statements. (Ref: par. ~~8-78.8e~~)

- h. Management's description of a service organization's system, and a service auditor's report on that description and [on](#) the suitability of the design of controls (referred to in this chapter as a *type 1 report*).** A report that comprises the following:
- i. Management's description of the service organization's system
  - ii. A written assertion by management of the service organization about whether, based on [the suitable](#) criteria,
    - (1) management's description of the service organization's system fairly presents the service organization's system that was designed and implemented as of a specified date
    - (2) the controls related to the control objectives stated in management's description of the service organization's system were suitably designed to achieve those control objectives as of the specified date
  - iii. A service auditor's report that expresses an opinion on the matters in (ii-)(1)– (ii-)(2)
- i. Management's description of a service organization's system, and a service auditor's report on that description and [on](#) the suitability of the design and operating effectiveness of controls (referred to in this chapter as a *type 2 report*).** A report that comprises the following:
- i. Management's description of the service organization's system
  - ii. A written assertion by management of the service organization about whether, based on [the suitable](#) criteria,
    - (1) management's description of the service organization's system

fairly presents the service organization's system that was designed and implemented throughout the specified period

(2) the controls related to the control objectives stated in management's description of the service organization's system were suitably designed throughout the specified period to achieve those control objectives

(3) the controls related to the control objectives stated in management's description of the service organization's system operated effectively throughout the specified period to achieve those control objectives

iii. A service auditor's report that

(1) expresses an opinion on the matters in (ii)-(1)-(ii)-(3)

(2) includes a description of the tests of controls and the results thereof

*j.* **Service auditor.** A practitioner who reports on controls at a service organization.

*k.* **Service organization.** An organization or segment of an organization that provides services to user entities, which are likely to be relevant to those user entities' internal control over financial reporting.

*l.* **Service organization's assertion.** A written assertion about the matters referred to in part (ii) of the definition of *Report on management's description of a service organization's system and the suitability of the design and operating effectiveness of controls*, for a type 2 report; and, for a type 1 report, the matters referred to in part (ii) of the definition of *Report on management's description of a service organization's system and the suitability of the design of*

*controls.*

- m.* **Service organization's system.** The policies and procedures designed, implemented, and documented by management of the service organization to provide user entities with the services covered by the service auditor's report. Management's description of the service organization's system identifies the services covered, the period to which the description relates (or in the case of a type 1 report, the date to which the description relates), the control objectives specified by management or an outside party, the party specifying the control objectives (if not specified by management), and the related controls. (Ref: par. 8.A8)
- n.* **Subservice organization.** A service organization used by another service organization to perform some of the services provided to user entities that are likely to be relevant to those user entities' internal control over financial reporting. (Ref: par. 8.A9)
- o.* **Test of controls.** A procedure designed to evaluate the operating effectiveness of controls in achieving the control objectives stated in management's description of the service organization's system. (Ref: [par. 8.A10](#))
- p.* **Type 1 report.** See [Management's description of a service organization's system, and a service auditor's report on that description and on the suitability of the design of controls](#) ~~paragraph 8.8*h*.~~
- q.* **Type 2 report.** See [Management's description of a service organization's system, and a service auditor's report on that description and on the suitability of the design and operating effectiveness of controls](#) ~~paragraph 8.7*i*.~~

**8.A8.** The policies and procedures referred to in the definition of *service organization's system* refer to the guidelines and activities for providing transaction processing and other services to user entities and include the infrastructure, software, people, and data that support the policies and procedures. (Ref: par. [8.78.8m](#))

**8.A9.** There may be instances in which a subservice organization uses the services of another service organization to perform services that are likely to be relevant to user entities' internal control over financial reporting. In those circumstances, the service organization that provides services to the subservice organization is also a subservice organization. (Ref: par. [8.78.8n](#))

~~8.A10 In this chapter the term "test of controls" is reserved for a test of the operating effectiveness of a control and does not include the process of assessing the suitability of the design of a control. (Ref: par. 8.7*o*)~~

<p>r. <b>User auditor.</b> An auditor who audits and reports on the financial statements of a user entity.</p> <p>s. <b>User entity.</b> An entity that uses a service organization for which controls at the service organization are likely to be relevant to that entity's internal control over financial reporting.</p>	
<p><b>Requirements</b></p>	
<p><b>Management and Those Charged with Governance</b></p> <p><b>8-8-8.9.</b> When this chapter requires the service auditor to inquire of, request representations from, communicate with, or otherwise interact with management of the service organization, the service auditor <i>should</i> determine the appropriate person(s) within the service organization's management or governance structure with whom to interact. This <i>should</i> include consideration of which person(s) has the appropriate responsibilities for and knowledge of the matters concerned. (Ref: par. <del>8.A11-8.A12</del>8.A10–8.A11)</p>	<p><b>Management and Those Charged with Governance</b></p> <p><b>8.A10. <del>8.A14</del></b> For the purposes of this chapter, the responsible party is management of the service organization. (Ref: par. <del>8-8.9</del>8.9)</p> <p><b>8.A11. <del>8.A12</del></b> Management and governance structures vary by entity, reflecting influences such as size and ownership characteristics. Such diversity means that it is not possible for this chapter to specify for all engagements the person(s) with whom the service auditor is to interact regarding particular matters. For example, the service organization may be a segment of an organization and not a separate legal entity. In such cases, identifying the appropriate management personnel or those charged with governance from whom to request written representations may require the exercise of professional judgment. (Ref: par. <del>8-8.9</del>8.9)</p>
<p><del>Preconditions</del><b>Acceptance and Continuance</b></p> <p><b>8.9-8.10.</b> A service auditor <i>should</i> accept or continue an engagement to report on controls at a service organization pursuant to this chapter only if the preconditions for an attestation engagement identified in chapter 1 and the following conditions are met:<sup>5</sup> (Ref: par. <del>8.A13-8.A14</del>8.A12–8.A13)</p>	<p><del>Preconditions</del><b>Acceptance and Continuance</b></p> <p><b>8.A12. <del>8.A13</del></b> In performing a service auditor's engagement, the service auditor need not be independent of each user entity. (Ref: par. <del>8-98.10</del>8.98.10)</p> <p><b>8.A13. <del>8.A14</del></b> If one or more of the conditions in paragraph <del>8-98.10</del>8.98.10 or in chapter 1 are not met and the service auditor is nevertheless required by law or regulation to accept or continue an engagement to report on</p>

<sup>5</sup> Paragraphs 1.24–1.28 of chapter 1.

- a. The service auditor's preliminary knowledge of the engagement circumstances indicates that the scope of the engagement and management's description of the service organization's system will not be so limited that they are unlikely to be useful to user entities and their auditors.
- b. Management acknowledges and accepts its responsibility for the following:
- i. Preparing its description of the service organization's system and its assertion, including the completeness, accuracy, and method of presentation of the description and assertion (Ref: par. [8.A15](#)8.A14)
  - ii. Having a reasonable basis for its assertion (Ref: par. [8.A16](#)8.A15)

controls at a service organization, the service auditor is required, in accordance with paragraphs [8.408.41–8.428.43](#), to determine the effect on the service auditor's report of one or more of such conditions not being met.<sup>6</sup> (Ref: par. [8.98.10](#))

*Management's Responsibility for Documenting the Service Organization's System*

**8.A14.** [8.A-15](#) Management of the service organization is responsible for documenting the service organization's system. No one particular form of documentation is prescribed and the extent of documentation may vary depending on the size and complexity of the service organization and its monitoring activities. (Ref: par. [8.98.10b\[i\]](#))

*Reasonable Basis for Management's Assertion*

**8.A15.** [8.A-16](#) Management's monitoring activities may provide evidence of the design and operating effectiveness of controls in support of management's assertion. *Monitoring of controls* is a process to assess the effectiveness of internal control performance over time. It involves assessing the effectiveness of controls on a timely basis, identifying and reporting deficiencies to appropriate individuals within the service organization, and taking necessary corrective actions. Management accomplishes monitoring of controls through ongoing activities, separate evaluations, or a combination of the two. Ongoing monitoring activities are often built into the normal recurring activities of an entity and include regular management and supervisory activities. Internal auditors or personnel performing similar functions may contribute to the monitoring of a service organization's activities. Monitoring activities may also include using information communicated

<sup>6</sup> Paragraphs 1.24–1.28 of chapter 1.

- iii. Selecting the criteria to be used and stating them in the assertion
- iv. Specifying the control objectives, stating them in the description of the service organization's system, and, if the control objectives are specified by law, regulation, or another party (for example, a user group or a professional body), identifying in the description the party specifying the control objectives (Ref: par. [8.A17](#)8.A16)
- v. Identifying the risks that threaten the achievement of the control objectives stated in the description and designing, implementing, and documenting controls that are suitably designed and operating effectively to provide reasonable assurance that the control objectives stated in the description of the service organization's system will be achieved (Ref: par. [8.A18](#)8.A17)

by external parties, such as customer complaints, which may indicate problems or highlight areas in need of improvement. The greater the degree and effectiveness of ongoing monitoring, the less need for separate evaluations. Usually, some combination of ongoing monitoring and separate evaluations will ensure that internal control maintains its effectiveness over time. The service auditor's report on controls is not a substitute for the service organization's own processes to provide a reasonable basis for its assertion. (Ref: par. [8-98.10b](#)[ii] and [8-138.14a](#)[viii])

**8.A16.** [8-A-17](#)The control objectives stated in management's description of the service organization's system relate to the types of financial statement assertions commonly embodied in the broad range of user entities' financial statements to which controls at the service organization could reasonably be expected to relate. (Ref: par. [8-98.10b](#)[iv])

*Identification of Risks*

**8.A17.** [8-A18](#) Control objectives relate to risks that controls seek to mitigate. For example, the risk that a transaction is recorded at the wrong amount or in the wrong period can be expressed as a control objective that transactions are recorded at the correct amount and in the correct period. Management is responsible for identifying the risks that threaten achievement of the control objectives stated in management's description of the service organization's system. This includes the risks the service organization assumes in the design of its controls will be addressed by controls at user entities or subservice organizations. Management may have a formal or informal process for identifying relevant risks. A formal process may include estimating the significance of identified risks, assessing the likelihood of their occurrence, and deciding about actions to address them. However, because control objectives relate to risks that controls seek to mitigate, thoughtful identification by management of control objectives when designing,

<p>vi. Providing a written assertion that accompanies management's description of the service organization's system, both of which will be provided to user entities (Ref: par. <del>8.A19</del>8.A18)</p>	<p>implementing, and documenting the service organization's system may itself comprise an informal process for identifying relevant risks. (Ref: par. <del>8.98.10b</del>[v])</p> <p><b>8.A18.</b> <del>8.A19</del>The service organization's assertion may be attached to the description of the service organization's system or may be included in the description if clearly segregated from the description, for example, through the use of headings. Segregating the assertion from the description clarifies that the assertion is not part of the description. (Ref: par. <del>8.78.8h</del>[ii], <del>8.78.8</del>[ii], <del>8.98.10b</del>[vi], <del>8.38</del>8.39e, and <del>8.39</del>8.40e)</p>
<p><del>8.10.8.11.</del> When the inclusive method is used, the service auditor should apply the requirements in <u>chapters 1, 2 and</u> this chapter to the services provided by the subservice organization, <u>as applicable</u>, including the requirement to obtain management's acknowledgement and acceptance of responsibility for the matters in paragraph <del>8.98.10b(i)–(vi)</del> as they relate to the subservice organization. (Ref: par. <del>8.A20</del>8.A19 and <del>8.A37</del>8.A36)</p>	<p><b>8.A19.</b><del>8.A 20</del> The inclusive method is generally feasible if, for example, the service organization and the subservice organization are related, or if the contract between the service organization and the subservice organization provides for the <u>use issuance</u> of <u>the inclusive method a single service auditor's report that includes both entities</u>. (Ref: par. <del>8.108.11</del>)</p> <p><b>8.A20.</b><u>If the inclusive method is used, matters to be agreed upon or coordinated by the service organization and the subservice organization entail</u></p> <ul style="list-style-type: none"> <li>• <u>the scope of the examination and the period to be covered by the report</u></li> <li>• <u>acknowledgment from management of the subservice organization that it will provide the service auditor with a written assertion and representation letter (Both management of the service organization and management of the subservice organization are responsible for providing the service auditor with a written assertion and representation letter.)</u></li> <li>• <u>the planned content and format of the inclusive description</u></li> </ul>

	<ul style="list-style-type: none"> <li>• <a href="#">the representatives of the subservice organization and the service organization who will be responsible for</a> <ul style="list-style-type: none"> <li>— <a href="#">providing the initial draft of each entity's description</a></li> <li>— <a href="#">integrating the descriptions</a></li> </ul> </li> <li>• <a href="#">for a type 2 report, the timing of the tests of controls</a></li> </ul> <p>(Ref: <a href="#">par. 8.11</a>)</p>
<p><i>Request to Change the Scope of the Engagement</i></p> <p><b>8.11-8.12.</b> As required by chapter 1, if management requests a change in the scope of the engagement before the completion of the engagement, the service auditor <i>should</i> be satisfied, before agreeing to the change, that a reasonable justification for the change exists.<sup>7</sup> (Ref: par. 8.A21–8.A22 <a href="#">and 8.A57</a>)</p>	<p><i>Request to Change the Scope of the Engagement</i></p> <p><b>8.A21.</b> <del>8.A 21A</del> request to change the scope of the engagement may not have a reasonable justification if, for example, the request is made</p> <ul style="list-style-type: none"> <li>• to exclude certain control objectives at the service organization from the scope of the engagement because of the likelihood that the service auditor's opinion would be modified with respect to those control objectives.</li> <li>• to prevent the disclosure of deviations identified at a subservice organization by requesting a change from the inclusive method to the carve-out method. (Ref: par. <del>8.11</del>8.12)</li> </ul> <p><b>8.A22.</b> <del>8.A22</del> A request to change the scope of the engagement may have a reasonable justification when, for example, the request is made because the service organization, a transfer agent, after providing the description of its system to the service auditor, decides that it would like to remove a control objective related to new fund set up because only one fund was set up during the reporting period and management of the fund had performed its own testing. The service auditor concluded that the removal of the control objective related to new fund setup was</p>

<sup>7</sup> Paragraph 1.29 of chapter 1.

	<p>reasonable in the circumstances because the objective was not relevant to a broad range of user entities during the examination period. (Ref: par. <del>8.11</del>8.12)</p>
<p><b>Assessing the Suitability of the Criteria</b></p> <p><b>8.12.8.13.</b> As required by chapter 1, the service auditor <i>should</i> assess whether management has used suitable criteria in<sup>8</sup></p> <ul style="list-style-type: none"> <li>a. preparing its description of the service organization's system;</li> <li>b. evaluating whether controls were suitably designed to achieve the control objectives stated in the description; and</li> <li>c. evaluating whether controls operated effectively throughout the specified period to achieve the control objectives stated in the description of the service organization's system, in the case of a type 2 report,</li> </ul> <p>(Ref: par. 8.A23–8.A24)</p>	<p><b>Assessing the Suitability of the Criteria</b></p> <p><b>8.A23.</b> <del>8.A23</del> Chapter 1 requires a practitioner, among other things, to determine whether the subject matter is capable of evaluation against criteria that are suitable and available to users.<sup>9</sup> Chapter 1 also indicates that one of the attributes of an appropriate subject matter is that it is identifiable and capable of consistent measurement or evaluation against the <del>applicable</del> criteria.<sup>10</sup> As indicated in chapter 1, the responsible party (in this case, management of the service organization) or the engaging party is responsible for selecting the criteria, and the engaging party is responsible for determining that such criteria are appropriate for its purposes.<sup>11</sup> Chapter 1 defines the subject matter as the phenomenon that is measured or evaluated by applying criteria.<sup>12</sup> Exhibit C identifies the subject matter and minimum criteria for each of the opinions in type 2 and type 1 reports. (Ref: par. <del>8.12</del>8.13)</p> <p><b>8.A24.</b> <del>8.A24</del> For the purposes of engagements performed in accordance with this chapter, criteria need to be available to user entities and their auditors to enable them to understand the basis for the service organization's assertion about the fair presentation of management's description of the service organization's system, the suitability of the design of controls that address control objectives stated in the description of the system and, in the case of a type 2 report, the operating effectiveness of such controls. Information about suitable</p>

<sup>8</sup> Paragraph 1.25b(ii) of chapter 1.  
<sup>9</sup> Paragraph 1.25b(ii) of chapter 1.  
<sup>10</sup> Paragraph 1.A~~363~~7a of chapter 1.  
<sup>11</sup> Paragraph 1.A46 of chapter 1.  
<sup>12</sup> Paragraph 1.10bb of chapter 1.

	<p>criteria is provided in chapter 1.<sup>13</sup> Paragraphs <del>8.13</del>8.14–<del>8.15</del>8.16 discuss the criteria for evaluating the fairness of the presentation of management's description of the service organization's system and the suitability of the design and operating effectiveness of the controls. (Ref: par. <del>8.12</del>8.13)</p>
<p><del>8.13-8.14.</del> In assessing the suitability of the criteria to evaluate whether management's description of the service organization's system is fairly presented, the service auditor <i>should</i> determine if the criteria include, at a minimum (Ref: par. <del>8.A25</del>)</p> <ul style="list-style-type: none"> <li>a. whether management's description of the service organization's system presents how the service organization's system was designed and implemented, including the following information about the service organization's system, if applicable:                     <ul style="list-style-type: none"> <li>i. The types of services provided including, as appropriate, the classes of transactions processed.</li> <li>ii. The procedures, within both automated and manual systems, by which services are provided, including, as appropriate, procedures by which transactions are initiated, authorized, recorded, processed, corrected as necessary, and transferred to the reports and other information prepared for user entities.</li> <li>iii. The information used in the performance of the procedures, including, if applicable, related accounting records, whether electronic or manual, and supporting information involved in initiating, authorizing, recording, processing, and reporting transactions. This includes the correction of incorrect information and how information is transferred to the reports and other information prepared for user entities.</li> </ul> </li> </ul>	<p><del>8.A25.</del> Paragraph <del>8.13</del> identifies a number of elements that are included in management's description of the service organization's system as appropriate. These elements may not be applicable if the system being described is not a system that processes transactions, for example, a system that</p> <ul style="list-style-type: none"> <li>—</li> <li>• <del>relates to IT general controls over the hosting of an IT application,</del></li> <li style="padding-left: 20px;"><del>or,</del></li> <li>• <del>accumulates and reports data, for example, prices, or</del></li> <li>• <del>generates and distributes statements for customers of user entities</del></li> </ul> <p>(Ref: par. <del>8.13</del>)</p>

<sup>13</sup> Paragraph 1.25b(ii) of chapter 1.

- iv. How the service organization's system captures and addresses significant events and conditions other than transactions.
  - v. The process used to prepare reports and other information for user entities.
  - vi. Services performed by a subservice organization, if any, including whether the inclusive method or the carve-out method has been used in relation to them.
  - vii. The specified control objectives and controls designed to achieve those objectives, including as applicable, complementary user entity controls and complementary subservice organization controls assumed in the design of the service organization's controls.
  - viii. Other aspects of the service organization's control environment, risk assessment process, information and communication systems (including the related business processes), control activities, and monitoring [activitiescontrols](#) that are relevant to the services provided. (Ref: par. [8-A168.A15](#) and [8-A268.A25](#))
- b. in the case of a type 2 report, whether management's description of the service organization's system includes relevant details of changes to the service organization's system during the period covered by the description (Ref: par. [8-A508.A49](#))
  - c. whether management's description of the service organization's system does not omit or distort information relevant to the service organization's system, while acknowledging that management's description of the service organization's system is prepared to

~~8-A26~~[8.A25](#), [8-A26](#) Management's description of the service organization's system and the scope of the service auditor's engagement includes controls at the service organization that monitor the effectiveness of controls at the subservice organization, which may include some combination of ongoing monitoring to determine that potential issues are identified timely and separate evaluations to determine that the effectiveness of internal control is maintained over time. Such monitoring activities may include

- reviewing and reconciling output reports,
- holding periodic discussions with the subservice organization,
- making regular site visits to the subservice organization,
- testing controls at the subservice organization by members of the service organization's internal audit function,

<p>meet the common needs of a broad range of user entities and their user auditors, and may not, therefore, include every aspect of the service organization's system that each individual user entity and its user auditor may consider important in its own particular environment.</p>	<ul style="list-style-type: none"> <li>• reviewing type 1 or type 2 reports on the subservice organization's system prepared pursuant to this chapter or chapter 2, and</li> <li>• monitoring external communications, such as customer complaints relevant to the services by the subservice organization. (Ref: par. <del>8-13</del>8.14a[viii])</li> </ul>
<p><del>8-14</del><u>8.14-8.15</u>. In assessing the suitability of the criteria to evaluate whether the controls are suitably designed, the service auditor <i>should</i> determine if the criteria include, at a minimum, whether</p> <ol style="list-style-type: none"> <li>a. the risks that threaten the achievement of the control objectives stated in management's description of the service organization's system have been identified by management.</li> <li>b. the controls identified in management's description of the service organization's system would, if operating effectively, provide reasonable assurance that those risks would not prevent the control objectives stated in the description from being achieved.</li> </ol>	
<p><del>8-15</del><u>8.15-8.16</u>. In assessing the suitability of the criteria to evaluate whether controls operated effectively to provide reasonable assurance that the control objectives stated in management's description of the service organization's system were achieved, the service auditor <i>should</i> determine if the criteria include, at a minimum, whether the controls were consistently applied as designed throughout the specified period, including whether manual controls were applied by individuals who have the appropriate competence and authority.</p>	
<p><del>8-16</del><u>8.16-8.17</u>. Chapter 2 requires a practitioner to request from the responsible party a written assertion about the measurement or evaluation of the subject matter against the <u>applicable</u> criteria.<sup>14</sup> The practitioner should determine that management's assertion addresses all</p>	<p><del>8-A27</del><u>8.A27-8.A26</u>. <del>8-A27</del> Exhibit B contains illustrative management assertions for type 1 and type 2 engagements. (Ref: par. <del>8-16</del>8.17)</p>

<sup>14</sup> Paragraph 2.10 of chapter 2.

<p>of the criteria management used to evaluate the fairness of the presentation of the description, the suitability of the design of the controls, and in a type 2 engagement, the operating effectiveness of the controls. (Ref: par. <a href="#">8.A278.A26</a>)</p>	
<p><b>Materiality</b></p> <p><a href="#">8.17.8.18</a>. The service auditor's consideration of materiality <i>should</i> include the fair presentation of management's description of the service organization's system, the suitability of the design of controls to achieve the related control objectives stated in the description and, in the case of a type 2 report, the operating effectiveness of the controls to achieve the related control objectives stated in the description. (Ref: par. <a href="#">8.A288.A27–8.A308.A29</a>)</p>	<p><b>Materiality</b></p> <p><del>8.A28.8.A27</del>, <a href="#">8.A28</a> In an engagement to report on controls at a service organization, the concept of materiality relates to the information being reported on, not the financial statements of user entities. The service auditor plans and performs procedures to determine whether, in all material respects, <a href="#">based on the criteria in management's assertion</a>, management's description of the service organization's system is fairly presented; controls at the service organization are suitably designed to achieve the control objectives stated in the description; and, in the case of a type 2 report, controls at the service organization operated effectively throughout the specified period to achieve the control objectives stated in the description. The concept of materiality takes into account that the service auditor's report provides information about the service organization's system to meet the common information needs of a broad range of user entities and their auditors who have an understanding of the manner in which the system is being used by a particular user entity for financial reporting. (Ref: par. <a href="#">8.178.18</a>, <a href="#">8.238.24</a>, <a href="#">8.258.26</a>, and <a href="#">8.268.27</a>)</p>
	<p><del>8.A29.8.A28</del>, <a href="#">8.A29</a> Materiality with respect to the fair presentation of management's description of the service organization's system and with respect to the design of controls primarily includes the consideration of qualitative factors, for example, whether</p> <ul style="list-style-type: none"> <li>• management's description of the service organization's system includes the significant aspects of the processing of transactions.</li> <li>• management's description of the service organization's system omits or distorts relevant information.</li> </ul>

	<ul style="list-style-type: none"> <li>the controls have the ability, as designed, to provide reasonable assurance that the control objectives stated in management's description of the service organization's system would be achieved.</li> </ul> <p>Materiality with respect to the operating effectiveness of controls includes the consideration of both quantitative and qualitative factors, for example, the tolerable rate and observed rate of deviation (a quantitative matter) and the nature and cause of any observed deviations (a qualitative matter). (Ref: par. <a href="#">8-178.18</a>, <a href="#">8-238.24</a>, and <a href="#">8-258.26</a>, and <a href="#">-8-268.27</a>)</p>
	<p><del>8-A30-8.A29</del>, <del>8-A-30</del> The concept of materiality is not applied when disclosing, in the description of the tests of controls, the results of those tests when deviations have been identified. This is because, in the particular circumstances of a specific user entity or user auditor, a deviation may have significance beyond whether or not, in the opinion of the service auditor, it prevents a control from operating effectively. For example, the control to which the deviation relates may be particularly significant in preventing a certain type of error that may be material in the particular circumstances of a user entity's financial statements. (Ref: par. <a href="#">8-178.18</a> and <a href="#">8-268.27</a>)</p>
<p><b>Obtaining an Understanding of the Service Organization's System and Assessing the Risk of Material Misstatement</b></p> <p><del>8-18-8.19</del>. The service auditor <i>should</i> obtain an understanding of the service organization's system, including controls that are included in the scope of the engagement. That understanding should include service organization processes used to</p> <ol style="list-style-type: none"> <li>prepare the description of the service organization's system, including the determination of control objectives,</li> <li>identify controls designed to achieve the control objectives,</li> </ol>	<p><b>Obtaining an Understanding of the Service Organization's System and Assessing the Risk of Material Misstatement</b></p> <p><del>8-A31-8.A30</del>, <del>8-A31</del> Obtaining an understanding of the service organization's system, including related controls, assists the service auditor in the following:</p> <ul style="list-style-type: none"> <li>Identifying the boundaries of the system and how it interfaces with other systems</li> <li>Assessing whether management's description of the service organization's system fairly presents the service organization's</li> </ul>

<p>c. assess the suitability of the design of the controls, and</p> <p>d. in a type 2 report, assess the operating effectiveness of controls.</p> <p>(Ref: par. 8.A30–8.A31<del>8.A31–9</del>)</p>	<p>system that has been designed and implemented</p> <ul style="list-style-type: none"> <li>• Understanding which controls are necessary to achieve the control objectives stated in management's description of the service organization's system, whether controls were suitably designed to achieve those control objectives, and, in the case of a type 2 report, whether controls were operating effectively throughout the specified period to achieve those control objectives.</li> <li>• When a separate type 1 or type 2 report exists for a subservice organization, whether management has identified controls that are necessary, either at the service organization or at user entities, to address relevant complementary user entity controls identified in the carved-out subservice organization's description of its system</li> </ul> <p>(Ref: par. <del>8.18</del>8.19)</p>
	<p><del>8.A32-8.A31. 8.A32</del> Paragraph <del>8.13</del>8.14a(viii) indicates that the criteria for assessing whether management's description of the service organization's system is fairly presented should include other aspects of the service organization's control environment, risk assessment process, information and communication systems (including relevant business processes), control activities, and monitoring activities that are relevant to the services provided. Although aspects of the service organization's control environment, risk assessment process, and monitoring activities may not be presented in the description in the context of control objectives, they may nevertheless be necessary to achieve the specified control objectives stated in the description. Likewise, deficiencies in these controls may have an effect on the service auditor's assessment of whether the controls, taken as a whole, were suitably designed or operating effectively to achieve the specified</p>

<p><del>8.19-8.20.</del> If the service organization has an internal audit function, part of the service auditor's understanding of the service organization's system should include the following:</p> <ol style="list-style-type: none"> <li>a. The nature of the internal audit function's responsibilities and how the internal audit function fits in the service organization's organizational structure</li> <li>b. The activities performed or to be performed by the internal audit function as it relates to the service organization (<a href="#">Ref: par. 8.A32</a>)</li> </ol>	<p>control objectives. (Ref: par. <del>8.18</del>8.19)</p> <p><del>8.A33-8.A32.</del> <del>8.A33</del> The service auditor's procedures to obtain the understanding may include the following:</p> <ul style="list-style-type: none"> <li>• Inquiring of management and others within the service organization who, in the service auditor's judgment, may have relevant information</li> <li>• Observing operations and inspecting documents, reports, and printed and electronic records of transaction processing</li> <li>• Inspecting a selection of agreements between the service organization and user entities to identify their common terms</li> <li>• Reperforming the application of a control</li> </ul> <p>One or more of the preceding procedures may be accomplished through the performance of a walkthrough. (Ref: par. <del>8.19</del>8.20)</p>
<p><del>8.20-8.21.</del> As required by chapter 2, the service auditor should identify the risks of material misstatement.<sup>15</sup> (Ref: par. <del>8.A34-8.A35</del><del>8.A33-8.A34</del>)</p>	<p><del>8.A34-8.A33.</del> <del>8.A34</del> In a type 1 or type 2 engagement, the risk of material misstatement relates to the risk that, in all material respects, <u>based on the criteria in management's assertion,</u></p> <ol style="list-style-type: none"> <li>a. management's description of the service organization's system is not fairly presented;</li> <li>b. the controls are not suitably designed to provide reasonable assurance that the control objectives stated in management's description of the service organization's system would be achieved if the controls operated effectively; and</li> <li>c. in the case of a type 2 report, the controls did not operate effectively throughout the specified period to achieve the related</li> </ol>

<sup>15</sup> Paragraph 2.18 of chapter 2.

<p><del>8.21-8.22.</del> The service auditor should read the reports of the internal audit function and regulatory examinations that relate to the services provided, to user entities and the scope of the engagement, if any, to obtain an understanding of the nature and extent of the procedures performed and the related findings. The findings should be taken into consideration as part of the risk assessment and in determining the nature, timing, and extent of the tests.</p>	<p>control objectives stated in management's description of the service organization's system. (Ref: par. <del>8.20</del>8.21)</p> <p><del>8-A35-8.A34.8-A35</del>The risks identified in paragraph <del>8-A34</del>8.A33 may include those related to new or changed controls, system changes, significant changes in processing volume, new personnel or significant changes in key management or personnel, new types of transactions, new products or technologies, or modifications to the service auditor's opinion in the service auditor's report for the prior year. (Ref: par. <del>8-20</del>8.21)</p>
<p><b>Responding to Assessed Risks and Further Procedures</b></p> <p><del>8.22-8.23.</del> As required by paragraphs <del>8-23</del>8.24–8.38<del>8-36</del> and chapter 2,<sup>16</sup> the service auditor should</p> <ul style="list-style-type: none"> <li>a. design and implement overall responses to address the assessed risks of material misstatement for the subject matter, and</li> <li>b. design and perform further procedures whose nature, timing, and extent are based on, and responsive to, the assessed risks of material misstatement.</li> </ul>	
<p><b>Obtaining Evidence Regarding Management's Description of the</b></p>	<p><b>Obtaining Evidence Regarding Management's Description of the</b></p>

<sup>16</sup> Paragraphs 2.20–2.21 of chapter 2.

<p><b>Service Organization's System</b></p> <p><del>8.23-8.24.</del> The service auditor should obtain and read management's description of the service organization's system and <i>should</i> evaluate whether those aspects of the description that are included in the scope of the engagement are presented fairly, in all material respects, <u>based on the criteria in management's assertion</u>, including whether (Ref: par. <del>8.A28</del>8.A27–<del>8.A29</del>8.A28 and <del>8.A36</del>8.A35–<del>8.A40</del>8.A39)</p> <ol style="list-style-type: none"> <li>a. the control objectives stated in management's description of the service organization's system are reasonable in the circumstances, (Ref: par. <del>8.A39</del>8.A38)</li> <li>b. controls identified in management's description of the service organization's system were implemented, (Ref: par. <del>8.A36</del> and <del>8.A40</del>8.A39)</li> <li>c. complementary user entity controls and complementary subservice organization controls, if any, are adequately described, and (Ref: par. <del>8.A37</del>8.A36)</li> <li>d. services performed by a subservice organization, if any, are adequately described, including whether the inclusive method or the carve-out method has been used in relation to them. (Ref: par. <del>8.A37</del>8.A36)</li> </ol>	<p><b>Service Organization's System</b></p> <p><del>8.A36-8.A35.</del> <del>8.A36</del> In a service auditor's examination engagement, the service auditor plans and performs the engagement to obtain reasonable assurance of detecting <u>misstatements errors or omissions</u> in management's description of the service organization's system and instances in which control objectives were not achieved. Absolute assurance is not attainable because of factors such as the need for judgment, the use of sampling, and the inherent limitations of controls at the service organization that affect whether the description is fairly presented and the controls are suitably designed and operating effectively to achieve the control objectives, and because much of the evidence available to the service auditor is persuasive rather than conclusive in nature. Also, procedures that are effective for detecting unintentional <u>misstatements errors or omissions</u> in the description, and instances in which control objectives were not achieved, may be ineffective for detecting <u>misstatements fraud</u> in the description <u>resulting from fraud</u> and instances in which the control objectives were not achieved that are concealed through collusion between service organization personnel and a third party or among management or employees of the service organization. Therefore, the subsequent discovery of the existence of material <u>misstatements omissions or errors</u> in the description or instances in which control objectives were not achieved does not, in and of itself, evidence inadequate planning, performance, or judgment on the part of the service auditor. (Ref: par. <del>8-23</del>8.24, 8.26, 8.27, and <del>8-31</del>8.32)</p>
	<p><del>8.A37-8.A36.</del> <del>8.A37</del> Considering the following questions may assist the service auditor in determining whether management's description of the service organization's system is fairly presented, in all material respects, <u>based on the criteria in management's assertion</u>:</p> <ul style="list-style-type: none"> <li>• Is the description prepared at a level of detail that could</li> </ul>

reasonably be expected to provide a broad range of user auditors with sufficient information to obtain an understanding of internal control in accordance with AU-C section 402? The description need not address every aspect of the service organization's processing or the services provided to user entities and need not be so detailed that it would potentially enable a reader to compromise security or other controls at the service organization.

- Is the description prepared in a manner that does not omit or distort information that might affect the decisions of a broad range of user auditors; for example, does the description contain any significant omissions or inaccuracies regarding processing of which the service auditor is aware?
- Does the description include relevant details of changes to the service organization's system during the period covered by the description when the description covers a period of time?
- Have the controls identified in the description actually been implemented? ([Ref: par. 8.24b](#))
- If the inclusive method has been used, does the description separately identify controls at the service organization and controls at the subservice organization? ~~If the carve-out method is used, does the description identify the functions that are performed by the subservice organization and~~ [Does the description include activities controls](#) at the service organization that monitor the effectiveness of controls at the subservice organization? ~~If the carve-out method has been used, the description does not describe the detailed processing or controls at the subservice organization.~~ ([Ref. par. 8.8g](#), [8.7f](#), [8.108.11](#) and [8.238.24d](#))

	<ul style="list-style-type: none"> <li>• Are complementary user entity controls, if any, adequately described? In most cases, the control objectives stated in the description are worded so that they are capable of being achieved through the effective operation of controls implemented by the service organization alone. In some cases, however, the control objectives stated in the description cannot be achieved by the service organization alone because their achievement requires particular controls to be implemented by user entities. For example, to achieve the specified control objectives, a user entity may need to review the completeness and accuracy of input provided to the service organization before submitting it to the service organization or the completeness and accuracy of reports provided to the user entity subsequent to processing. When the description does include complementary user entity controls, the description separately identifies those controls along with the specific control objectives that cannot be achieved by the service organization alone. (Ref: par. <del>8-238.24c</del>)</li>   <li>• If the carve-out method has been used, does the description <u>identify the functions that are performed by the subservice organization? (When the carve-out method has been used, the description does not describe the detailed processing or controls at the subservice organization.) Does the description include activities at the service organization that monitor the effectiveness of controls at the subservice organization as well as include complementary subservice organization controls and include monitoring controls over subservice organizations?</u> (Ref: par. <del>8-78.8a</del> and <del>8-238.24d</del>)</li> </ul>
	<p><del>8-A38-8.A37. 8-A38</del> The service auditor's procedures to evaluate the fair presentation of management's description of the service organization's system may include the following:</p>

	<ul style="list-style-type: none"> <li>• Considering the nature of the user entities and how the services provided by the service organization are likely to affect them; for example, the predominant types of user entities, and whether the user entities are regulated by government agencies</li> <li>• Reading contracts with user entities to gain an understanding of the service organization's contractual obligations</li> <li>• Observing procedures performed by service organization personnel</li> <li>• Reviewing the service organization's policy and procedure manuals and other documentation of the system; for example, flowcharts and narratives</li> <li>• Performing walkthroughs of transactions through the service organization's system (Ref: par. <a href="#">8-238.24</a>)</li> </ul>
	<p><del>8-A39-8.A38</del>, <del>8-A39</del> Paragraph <a href="#">8-238.24a</a> requires the service auditor to evaluate whether the control objectives stated in management's description of the service organization's system are reasonable in the circumstances. Considering the following questions may assist the service auditor in this evaluation:</p> <ul style="list-style-type: none"> <li>• Do the control objectives stated in the description relate to the types of assertions commonly embodied in the broad range of user entities' financial statements to which controls at the service organization could reasonably be expected to relate (for example, assertions about existence and accuracy that are affected by access controls that prevent or detect unauthorized access to the system)? Although the service auditor ordinarily will not be able to determine how controls at a service organization specifically relate to the assertions embodied in individual user entities' financial statements, the service auditor</li> </ul>

considers matters, such as the following, when identifying the types of assertions to which the controls are likely to relate:

- The types of services provided [by the service organization](#), including the classes of transactions processed
- The contents of reports and other information prepared for user entities
- The information used in the performance of procedures
- The types of significant events other than transactions that occur in providing the services
- Services performed by a subservice organization, if any
- The responsibility of the service organization to implement controls, including responsibilities established in contracts and agreements with user entities
- The risks to a user entity's internal control over financial reporting arising from information technology used or provided by the service organization

- Are the control objectives stated in the description complete? Although a complete set of control objectives can provide a broad range of user auditors with a framework to assess the effect of controls at the service organization on assertions commonly embodied in user entities' financial statements, the service auditor ordinarily will not be able to determine how controls at a service organization specifically relate to the assertions embodied in individual user entities' financial statements and cannot, therefore, determine whether control objectives are complete from the viewpoint of individual user entities or user auditors. It is the responsibility of individual user

	<p>entities or user auditors to assess whether the service organization's description addresses the particular control objectives that are relevant to their needs. If the control objectives are specified by an outside party, including control objectives specified by law or regulation, the outside party is responsible for their completeness and reasonableness.</p> <p>(Ref: par. <del>8.23</del>8.24a)</p>
<p><del>8.24</del><u>8.25</u>. The service auditor should determine through inquiries made in combination with other procedures whether the service organization's system has been implemented. (Ref: par. <del>8.A40</del>8.A39)</p>	<p><del>8.A40</del><u>8.A39</u>. <del>8.A 40</del>The service auditor's procedures to determine whether the system described by the service organization has been implemented may be similar to, and performed in conjunction with, procedures to obtain an understanding of that system. Other procedures that the service auditor may use in combination with inquiry of management and other service organization personnel include observation, inspection of records and other documentation, and reperformance of the manner in which transactions are processed through the system and controls are applied. (Ref: par. <del>8.23</del>8.24b and <del>8.24</del>8.25)</p>
<p><b>Obtaining Evidence Regarding the Design of Controls</b></p> <p><del>8.25</del><u>8.26</u>. The service auditor should assess whether the controls that management identified in its description of the service organization's system as the controls that achieve the control objectives were suitably designed to achieve those control objectives by (Ref: par: <del>8.A28</del>8.A27–<del>8.A29</del>8.A28, <del>8.A35</del>8.A35, and <del>8.A41</del>8.A40–<del>8.A44</del>8.A43)</p> <ul style="list-style-type: none"> <li>a. obtaining <u>an understanding of</u> management's <u>process for documentation of its</u> <del>identification of</del> <u>and evaluating</u> the risks that threaten the achievement of the control objectives and assessing the completeness and accuracy of management's identification of those risks (Ref: par. <del>8.A41</del>8.A40)</li> <li>b. evaluating the linkage of the controls identified in management's description of the service organization's system with those risks,</li> </ul>	<p><b>Obtaining Evidence Regarding the Design of Controls</b></p> <p><del>8.A41</del><u>8.A40</u>. <del>8.A 41</del>The risks and control objectives identified in paragraph 8.26 encompass fraud and unintentional acts that threaten the achievement of the control objectives. (Ref: par. <del>8.25</del>8.26)</p> <p><del>8.A42</del><u>8.A41</u>. <del>8.A42</del>From the viewpoint of a user auditor, a control is suitably designed to achieve the control objectives stated in management's description of the service organization's system if individually or in combination with other controls, it would, when complied with satisfactorily, provide reasonable assurance that material misstatements are prevented, or detected and corrected. A service auditor, however, is not aware of the circumstances at individual user entities that would affect whether or not a misstatement resulting from a control deficiency is material to those user entities. Therefore, from the viewpoint of a service auditor, a control is suitably designed if</p>

<p>including risks arising from each of the described classes of transactions and risks that IT poses to the user entity's internal control over financial reporting, and (Ref: par. <del>8.A45</del>8.A44)</p> <p>c. determining that the controls have been implemented</p>	<p>individually or in combination with other controls, it would, when complied with satisfactorily, provide reasonable assurance that the control objective(s) stated in the description of the service organization's system are achieved. (Ref: par. <del>8.258</del>8.26)</p> <p><del>8.A43-8.A42.</del> <del>8.A-43</del>A service auditor may consider using flowcharts, questionnaires, or decision tables to facilitate understanding the design of the controls. (Ref: par. <del>8.258</del>8.26)</p> <p><del>8.A44-8.A43.</del> <del>8.A44</del>Controls may consist of a number of activities directed at the achievement of various control objectives. Consequently, if the service auditor evaluates certain activities as being ineffective in achieving a particular control objective, the existence of other activities may allow the service auditor to conclude that controls related to the control objective are suitably designed to achieve the control objective. (Ref: par. <del>8.258</del>8.26)</p> <p><del>8.A45-8.A44.</del> <del>8.A45</del>The service organization may have different controls in place to address each of the risks associated with the control objective; therefore, multiple controls may be needed in order for the service auditor to conclude on the design of controls relating to each of the risks associated with the control objective. (Ref: par. <del>8.26-8.25</del>b)</p>
<p><b>Obtaining Evidence Regarding the Operating Effectiveness of Controls</b></p> <p><del>8.26-8.27.</del> When performing a type 2 engagement, the service auditor should test those controls that management has identified in its description of the service organization's system as the controls that achieve the control objectives and should assess the operating effectiveness of those controls throughout the period. Evidence obtained in prior engagements about the satisfactory operation of controls in prior periods does not provide a basis for a reduction in testing, even if it is supplemented with evidence obtained during the current period. (Ref: par. <del>8.A28-8.A30</del>8.A27, 8.A29, 8.A35, and <del>8.A46</del>8.A45–<del>8.A51</del>8.A50)</p>	<p><b>Obtaining Evidence Regarding the Operating Effectiveness of Controls</b></p> <p><del>8.A46-8.A45.</del> <del>8.A46</del>From the viewpoint of a user auditor, a control is operating effectively if individually or in combination with other controls, it provides reasonable assurance that material misstatements <del>whether due to fraud or error</del> are prevented, or detected and corrected. A service auditor, however, is not aware of the circumstances at individual user entities that would affect whether or not a misstatement resulting from a control deviation is material to those user entities. Therefore, from the viewpoint of a service auditor, a control is operating effectively if individually or in combination with other controls, it provides reasonable</p>

Reporting on an Examination of Controls at a Service Organization Relevant to User Entities' Internal Control Over Financial Reporting  
 September 30, 2015 Draft Marked from the July 21, 2015 Draft  
 ASB Meeting, October 13–15, 2015

	<p>assurance that the control objectives stated in management's description of the service organization's system are achieved. Similarly, a service auditor is not in a position to determine whether any observed control deviation would result in a material misstatement from the viewpoint of an individual user entity. (Ref: par. <a href="#">8-268.27</a>)</p>
	<p><del>8.A47-8.A46.</del> <del>8.A47</del> Obtaining an understanding of controls sufficient to opine on the suitability of their design is not sufficient evidence regarding their operating effectiveness unless some automation provides for the consistent operation of the controls as they were designed and implemented. For example, obtaining information about the implementation of a manual control at a point in time does not provide evidence about operation of the control at other times. However, because of the inherent consistency of IT processing, performing procedures to determine the design of an automated application control and whether it has been implemented may serve as evidence of that control's operating effectiveness, depending on the service auditor's assessment and testing of IT general controls such as those over program changes. (Ref: par. <a href="#">8-268.27</a>)</p>
	<p><del>8.A48-8.A47.</del> <del>8.A49</del> Evidence about the satisfactory operation of controls in prior periods does not provide evidence of the operating effectiveness of controls during the current period. The service auditor expresses an opinion on the effectiveness of controls throughout each period; therefore, sufficient appropriate evidence about the operating effectiveness of controls throughout the current period is required for the service auditor to express that opinion for the current period. Knowledge of modifications to the report or deviations observed in prior engagements may, however, be considered in assessing risk and lead the service auditor to increase the extent of testing during the current period. (Ref: par. <a href="#">8-268.27</a> ) <b>Moved here from old par. 8.A49.</b></p>
	<p><del>8.A49-8.A48.</del> <del>8.A48</del> Generally, a type 2 report(s) is most useful to user entities and their auditors when it covers a substantial portion of the period covered by the user entity's financial statements .being audited. (Ref: par. <a href="#">8-268.27</a> <del>and 8.27</del>)</p>

<p><del>8.27-8.28.</del> When performing a type 2 engagement, the service auditor should obtain an understanding of changes in the service organization's system that were implemented during the period covered by the service auditor's report. If the service auditor believes the changes would be considered significant by user entities and their auditors, the service auditor <i>should</i> determine whether those changes are included in management's description of the service organization's system. If such changes are not included in the description, the service auditor <i>should</i> describe the changes in the service auditor's report and determine the effect on the service auditor's report. If superseded controls are relevant to the achievement of the control objectives stated in the description, the service auditor <i>should</i>, if possible, test the superseded controls before the change. If the service auditor cannot test superseded controls relevant to the achievement of the control objectives stated in the description, the service auditor <i>should</i> determine the effect on the service auditor's report. (Ref: par. <del>8.A48</del>8.A49 <del>and 8.A50–8.A51</del>8.A50)</p>	<p><b>Moved old paragraph 8.A49 to new paragraph 8.A47.</b>  <del>8.A50-8.A49.</del> <del>8.A50</del> Determining the effect of changes in the service organization's controls that were implemented during the period covered by the service auditor's report involves gathering information about the nature and extent of such changes, how they affect processing at the service organization, and how they might affect assertions in the user entities' financial statements. (Ref: par. <del>8-138.14b</del>, <del>8-268.27</del>, and <del>8-278.28</del>)</p>
	<p><del>8.A51-8.A50.</del> <del>8.A51</del> Certain controls may not leave evidence of their operation that can be tested at a later date and, accordingly, the service auditor may find it appropriate to test the operating effectiveness of such controls at various times throughout the reporting period. (Ref: par. <del>8-268.27</del>—<del>and 8-278.28.</del>)</p>
<p><i>Evaluating the Reliability of Information Produced by the Service Organization</i></p> <p><del>8.28-8.29.</del> When using information produced by the service organization, chapter 2 requires the service auditor to evaluate whether such information is sufficiently reliable for the service auditor's purposes by obtaining evidence about its accuracy and completeness and evaluating whether the information is sufficiently precise and detailed.<sup>17</sup> (Ref: par. <del>8.A52</del>8.A51)</p>	<p><i>Evaluating the Reliability of Information Produced by the Service Organization</i></p> <p><del>8.A52-8.A51.</del> <del>8.A52</del>The following are examples of information produced by a service organization that are commonly used by a service auditor:</p> <ul style="list-style-type: none"> <li>• Population lists the service auditor uses to select a sample of items for testing</li> </ul>

<sup>17</sup> Paragraph 2.35 of chapter 2.

- Lists of data that have specific characteristics
- Exception reports
- Transaction reconciliations
- Documentation that provides evidence of the operating effectiveness of controls, such as user access lists
- System generated reports
- Other system generated data (Ref: par. ~~8-28~~8.29)

8-29-8.30. When designing and performing tests of controls, the service auditor *should*

- a. perform other procedures such as inspection, observation, or reperformance in combination with inquiry to obtain evidence about the following:
  - i. How the control was applied
  - ii. The consistency with which the control was applied
  - iii. By whom or by what means the control was applied
- b. determine whether the controls to be tested depend on other controls, and if so, whether it is necessary to obtain evidence supporting the operating effectiveness of those other controls.
- c. determine an effective method for selecting the items to be tested to meet the objectives of the procedure.

<p><i>Nature and Cause of Deviations</i></p> <p><b>8.30-8.31.</b> The service auditor <i>should</i> investigate the nature and cause of any deviations identified, and <i>should</i> determine whether</p> <ul style="list-style-type: none"> <li>a. identified deviations are within the expected rate of deviation and are acceptable. If so, the testing that has been performed provides an appropriate basis for concluding that the control operated effectively throughout the specified period.</li> <li>b. additional testing of the control or of other controls is necessary to reach a conclusion about whether the controls related to the control objectives stated in management's description of the service organization's system operated effectively throughout the specified period.</li> <li>c. the testing that has been performed provides an appropriate basis for concluding that the control did not operate effectively throughout the specified period.</li> </ul>	
<p><b>8.31-8.32.</b> If, as a result of performing the procedures in paragraph 8.31, the service auditor becomes aware that any identified deviations have resulted from fraud by service organization personnel, the service auditor <i>should</i> assess the risk that management's description of the service organization's system is not fairly presented, the controls are not suitably designed, and in a type 2 engagement, the controls are not operating effectively. (Ref: par. <b>8.A368.A35</b>)</p>	
<p><b>8.32-8.33. 8.44</b> If the service auditor becomes aware of incidents of noncompliance with laws and regulations, fraud or uncorrected <del>misstatement errors</del> attributable to management or other service organization personnel that are not clearly trivial and that may affect one or more user entities, the service auditor <i>should</i> determine the effect of such incidents on management's assertion, management's description of the service organization's system, the achievement of the control</p>	

<p>objectives, and the service auditor's report. <b>Moved here from old paragraph 8.44</b></p>	
<p><b>Subsequent Events</b></p> <p><del>8.33-8.34.</del> In performing subsequent events procedures as required by chapter 2, if the service auditor becomes aware of an event that is of such a nature and significance that its disclosure is necessary to prevent users of a type 1 or type 2 report from being misled, and information about that event is not disclosed by management in its description, the service auditor <i>should</i> disclose such event in the service auditor's report.<sup>18</sup></p>	
<p><b>Written Representations</b></p> <p><del>8.34-8.35.</del> In addition to the <u>written representations from management</u> <del>requirements in</del> <u>by</u> chapter 2 <del>of the attestation standards</del>, the service auditor <i>should</i> request <del>management of the service organization to provide</del> written representations indicating that it has disclosed to the service auditor any of the following of which it is aware:<sup>19</sup></p> <ul style="list-style-type: none"> <li>a. Instances of noncompliance with laws and regulations or uncorrected <u>misstatements</u><del>errors</del> attributable to the service organization that may affect one or more user entities</li> <li>b. Knowledge of any actual, suspected, or alleged fraud by management or the service organization's employees that could adversely affect the fairness of the presentation of management's description of the service organization's system or the completeness or achievement of the control objectives stated in the description (Ref: par. <del>8.A53</del>8.A52–<del>8.A57</del>8.A56)</li> </ul>	<p><b>Written Representations</b></p> <p><del>8.A53-8.A52.</del> <del>8.A53</del> Written representations reaffirming the service organization's assertion about the effective operation of controls may be based on ongoing monitoring activities, separate evaluations, or a combination of the two. (Ref: par. <del>8.33</del>8.35–<del>8.34</del>8.36)</p> <p><del>8.A54-8.A53.</del> <del>8.A54</del> In certain circumstances, a service auditor may obtain written representations from parties in addition to management of the service organization, such as those charged with governance (Ref: par. <del>8.33</del>8.35–<del>8.34</del>8.36)</p> <p><del>8.A55-8.A54.</del> <del>8.A55</del> The written representations required by paragraph <del>8.33</del>8.35 are separate from and in addition to the assertion that accompanies management's description of the service organization's system (Ref: par. <del>8.33</del>8.35–<del>8.34</del>8.36)</p> <p><b>Old paragraph 8.A56 was moved to new par. 8.A57</b></p>

<sup>18</sup> Paragraph 2.~~4847~~ of chapter 2.

<sup>19</sup> Paragraph 2.~~5049~~ of chapter 2.

Reporting on an Examination of Controls at a Service Organization Relevant to User Entities' Internal Control Over Financial Reporting  
 September 30, 2015 Draft Marked from the July 21, 2015 Draft  
 ASB Meeting, October 13–15, 2015

	<p><del>8.A56-8.A55, 8.A57</del> In addition to the written representations required by paragraph 8.35, the service auditor may consider it necessary to request other written representations. (Ref: par. <del>8.338.35–8.348.36</del>)</p>
<p><del>8.35-8.36.</del> If a service organization uses a subservice organization and management's description of the service organization's system uses the inclusive method, the service <i>auditor should</i> also obtain the written representations identified in chapter 2 and paragraph <del>8.338.35</del> from management of the subservice organization.<sup>20</sup> (Ref: par. <del>8.A538.A52–8.A578.A56</del>)</p>	
<p><del>8.36-8.37.</del> In a type 1 or type 2 engagement, the practitioner should <del>request obtain</del> from the responsible party (in this case, management of the service organization), the written representations required by chapter 2 and paragraph <del>8.338.35</del>, even if the engaging party is not the responsible party. <del>The alternative to obtaining the required written representations provided for in chapter 2 is not permitted in a type 1 or type 2 engagement.</del><sup>21</sup><del>The refusal by</del> <del>When</del> management of the service organization (or <del>by</del> management of a subservice organization that is being presented using the inclusive method) <del>refuses</del> to furnish <del>one of more of</del> the written representations required by chapter 2<sup>22</sup> and paragraph <del>8.338.35</del>, <del>constitutes a a-scope limitation on the scope of the engagement sufficient to preclude an unmodified opinion and may be sufficient to cause the service auditor to withdraw from the examination engagement when withdrawal is possible under applicable law or regulation exists and the practitioner should apply the requirements in chapter 2.</del><sup>23</sup> (Ref: par. <del>8.A588.A56–8.A57</del>)</p>	<p><del>8.A57-8.A56. 8.A58</del> <del>This chapter does not permit</del> <del>Because of the nature of the subject matter,</del> the service auditor <del>is not permitted</del> to perform the alternative procedures described in chapter 2 (making inquiries of the responsible party and restricting the use of the report) <del>in a type 1 or type 2 engagement.</del><sup>24</sup> <del>Therefore, the representations need to be confirmed in writing by management.</del> (Ref: par. <del>8.358.37</del>)</p> <p><del>8.A58-8.A57, 8.A56</del> If the service auditor is unable to obtain written representations regarding relevant control objectives and related controls at the subservice organization, management of the service organization <del>would be unable to use the inclusive method</del> but <del>may be able to</del> <del>could</del> use the carve-out method. (Ref: par. <del>8.12 and 8.378.33–8.34</del>)</p> <p>Old par 8.A56 was moved here</p>
<p><b>Other Information</b></p>	<p><b>Other Information</b></p>

<sup>20</sup> Paragraph 2.5049 of chapter 2.

<sup>21</sup> Paragraph of 2.51 of chapter 2.

<sup>22</sup> Paragraph 2.5049 of chapter 2.

<sup>23</sup> Paragraphs 2.5554-2.5655 and 2.A6364-2.A6465 of chapter 2.

<sup>24</sup> Paragraph 2.5150 of chapter 2.

<p><del>8.37-8.38.</del> Chapter 2 contains requirements for situations in which 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 practitioner's examination report in a document that contains the subject matter or assertion on which the service auditor reported and other information. (Ref: par. <del>8.A59</del>8.A58)<sup>25</sup></p>	<p><del>8.A59-8.A58.</del> <del>8.A59</del>The other information referred to in paragraphs 8.38 may include</p> <ul style="list-style-type: none"> <li>• information provided by the service organization and included in a separate section of the type 1 or type 2 report, or</li> <li>• information outside the type 1 or type 2 report included in a document that contains the service auditor's report. This other information may be provided by the service organization or by another party. (Ref: par. <del>8.368-38,</del> <del>8-388.39</del>c[iii], and <del>8-398.40</del>c[iii])</li> </ul>
<p><b>Reporting on an Examination of Controls at a Service Organization Relevant to User Entities' Internal Control Over Financial Reporting</b></p> <p><del>8.38.</del> Chapter 2 indicates that when performing an attestation engagement, a practitioner may report directly on the subject matter or on management's assertion.<sup>26</sup> For engagements conducted under this chapter, the service auditor should report directly on the subject matter.  <b>Moved to new par. 8.3</b></p> <p><i>Content of the Service Auditor's Report</i></p> <p><b>8.39.</b> A service auditor's type 2 report <i>should</i> include the following: (Ref: par. <del>8.A60</del>8.A59–<del>8.A61</del>8.A60)</p> <ol style="list-style-type: none"> <li>a. A title that includes the word independent</li> <li>b. An appropriate addressee as required by the circumstances of the</li> </ol>	<p><b>Reporting on an Examination of Controls at a Service Organization Relevant to User Entities' Internal Control Over Financial Reporting</b></p> <p><i>Content of the Service Auditor's Report</i></p> <p><del>8.A60-8.A59.</del> <del>8.A60</del> Examples of service auditors' reports are presented in exhibit A of this chapter and illustrative assertions by management of the service organization are presented in exhibit B. (Ref: par. <del>8-388.39</del>)</p> <p><del>8.A61-8.A60.</del> <del>8.A61</del> The list of report elements in paragraph <del>8-388.39</del> constitutes all of the required report elements for a service auditor's</p>

<sup>25</sup> Paragraph 2.5756 of chapter 2.

<sup>26</sup> ~~Paragraph 2.10 of chapter 2, "Examination Engagements."~~



<p>designed and operating effectively</p> <p>(c) the service auditor's procedures do not extend to such complementary subservice organization controls (Ref: par. <a href="#">8.A628.A61</a>)</p> <p>(2) If the inclusive method was used, a statement that management's description of the service organization's system includes the subservice organization's specified control objectives and related controls, and that the service auditor's procedures included procedures related to the subservice organization</p> <p><u>d. A statement that the controls and control objectives included in the description are those that management believes are likely to be relevant to user entities' internal control over financial reporting and the description does not include those aspects of the system that are not likely to be relevant to user entities' internal control over financial reporting</u></p> <p><u>ed</u> If management's description of the service organization's system refers to the need for complementary user entity controls, a statement that the service auditor has not evaluated the suitability of the design or operating effectiveness of complementary user entity controls, and that the control objectives stated in the description can be achieved only if complementary user entity controls are suitably designed and operating effectively, along with the controls at the service organization</p>	<p>specified in the description can be achieved only if controls at the subservice organization assumed in the design of XYZ Service Organization's controls are suitably designed and operating effectively, along with related controls at XYZ Service Organization. Our examination did not extend to controls of the subservice organization and we have not evaluated the suitability of the design or operating effectiveness of such subservice organization controls. (Ref: par. <del>8.388.39</del><a href="#">8.388.39</a>[iv][1]) and <del>8.398.40</del><a href="#">8.398.40</a>[iv][1])</p>
<p><u>fe.</u> A reference to management's assertion and a statement that management is responsible for (<a href="#">Ref: par. 8.A18</a>)</p>	

- i. preparing the description of the service organization's system and the assertion, including the completeness, accuracy, and method of presentation of the description and assertion
- ii. providing the services covered by the description of the service organization's system
- iii. specifying the control objectives and stating them in the description of the service organization's system
- iv. identifying the risks that threaten the achievement of the control objectives
- v. selecting the criteria
- vi. designing, implementing, and documenting controls that are suitably designed and operating effectively to achieve the related control objectives stated in the description of the service organization's system

*gf.* A statement that the service auditor is responsible for expressing an opinion on the fairness of the presentation of management's description of the service organization's system and on the suitability of the design and operating effectiveness of the controls to achieve the related control objectives stated in the description, based on the service auditor's examination

*hg.* A statement that

- i. the examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants
- ii. those standards require that the service auditor plan and

perform the examination to obtain reasonable assurance about whether, in all material respects, based on the criteria in management's assertion, management's description of the service organization's system is fairly presented and the controls are suitably designed and operating effectively throughout the specified period to achieve the related control objectives based on the criteria in management's assertion

- iii. the service auditor believes the evidence obtained is sufficient and appropriate to provide a reasonable basis for the service auditor's opinion

*iih.* A statement that an examination of management's description of a service organization's system and the suitability of the design and operating effectiveness of the service organization's controls to achieve the related control objectives stated in the description involves

- i. performing procedures to obtain evidence about the fairness of the presentation of the description and the suitability of the design and operating effectiveness of those controls to achieve the related control objectives stated in the description, based on the criteria in management's assertion
- ii. assessing the risks that management's description of the service organization's system is not fairly presented and that the controls were not suitably designed or operating effectively to achieve the related control objectives
- iii. testing the operating effectiveness of those controls that management considers necessary to provide reasonable assurance that the related control objectives stated in management's description of the service organization's system were achieved

iv. evaluating the overall presentation of management's description of the service organization's system, suitability of the control objectives stated in the description, and suitability of the criteria specified by the service organization in its assertion

*ii.* A description of the inherent limitations of controls, including that projecting to the future any evaluation of the fairness of the presentation of management's description of the service organization's system or conclusions about the suitability of the design or operating effectiveness of the controls to achieve the related control objectives is subject to the risk that controls at a service organization may become ineffective

*kj.* A reference to a description of the service auditor's tests of controls and the results thereof that includes (Ref: par. 8.A62-8.A64)

- i. an identification of the controls that were tested
- ii. whether the items tested represent all or a selection of the items in the population
- iii. the nature of the tests in sufficient detail to enable user auditors to determine the effect of such tests on their risk assessments
- iv. any identified deviations in the operation of controls included in the description, the extent of testing performed by the service auditor that led to the identification of the deviations (including the number of items tested), and the number and nature of the deviations noted (even if, on the basis of tests performed, the

*Description of the Service Auditor's Tests of Controls and the Results Thereof*

~~8.A63-8.A62.8.A64.~~ The service auditor may include in the description of tests of controls and results the procedures the service auditor performed to verify the completeness and accuracy of information provided by the service organization. (Ref: par. ~~8.388.39~~*kj*)

~~8.A64.8.A63.~~ *8.A63* In describing the service auditor's tests of controls and results thereof for a type 2 report, it assists readers if the service auditor's report includes information about causative factors for identified deviations, to the extent the service auditor has identified such factors. (Ref: par. ~~8.388.39~~*kj*[iv])

~~8.A64. The service auditor may include in the description of tests of controls and results the procedures the service auditor performed to verify the completeness and accuracy of information provided by the service organization. (Ref: par. 8.38j)~~ **Moved old par. 8.A64 to new par. 8.A62.**

~~8.A65-8.A64.~~ *8.A65* When the work of the internal audit function has been used in performing tests of controls, the service auditor's

service auditor concludes that the related control objective was achieved) (Ref: par. 8.A62~~8.A63–8.A67~~8.A66)

- v. if the work of the internal audit function has been used in tests of controls to obtain evidence, a description of the internal auditor's work and of the service auditor's procedures with respect to that work (Ref: par. ~~8.A65~~8.A64–~~8.A66~~8.A65)

description of that work and of the service auditor's procedures with respect to that work may be presented in a number of ways, for example,

- by including introductory material to the description of tests of controls indicating that certain work of the internal audit function was used in performing tests of controls and describing the service auditor's procedures with regard to that work.
- by attributing individual tests to internal audit and describing the service auditor's procedures with regard to that work.

(Ref: par. ~~8-388.39~~8.388.39~~k~~k[v])

~~8.A66-8.A65. 8.A66-When internal auditors have provided direct assistance to the service auditor under the service auditor's direction, supervision, and review, the description of the use of T~~the work of the internal audit function referred to in paragraph ~~8-388.39~~8.388.39~~k~~k(v) does not include tests ~~of controls~~ performed by internal auditors as a part of ~~the~~ direct assistance.(Ref: par. ~~8-388.39~~8.388.39~~k~~k[v])

~~8.A67-8.A66-8.A67~~ 8.A67-8.A66-8.A67 Other than the description of the work of the internal auditors referred to in paragraph 8-388.39~~k~~k(v), ~~T~~the service auditor's report does not make any reference to the use of the work of the internal audit function to obtain evidence or to the use of internal auditors to provide direct assistance, ~~—other than the description of the work of the internal audit function referred to in paragraph 8-38~~8.38~~j~~j(v). (Ref: par. ~~8-388.39~~8.388.39~~k~~k[v])

<p><u>!k.</u> The service auditor's opinion on whether, in all material respects, based on the criteria described in management's assertion,</p> <ul style="list-style-type: none"> <li>i. management's description of the service organization's system fairly presents the service organization's system that was designed and implemented throughout the specified period</li> <li>ii. the controls related to the control objectives stated in management's description of the service organization's system were suitably designed to provide reasonable assurance that those control objectives would be achieved if the controls operated effectively throughout the specified period</li> <li>iii. the controls operated effectively to provide reasonable assurance that the control objectives stated in management's description of the service organization's system were achieved throughout the specified period</li> <li>iv. if the application of complementary user entity controls is necessary to achieve the related control objectives stated in management's description of the service organization's system, a reference to this condition</li> <li>v. if the application of complementary subservice organization controls is necessary to achieve the related control objectives stated in management's description of the service organization's system, a statement to that effect</li> </ul>	
<p><u>m.</u> An alert in a separate paragraph <u>that restricts the use</u> of the <u>service auditor's</u> report; the alert should <del>state that the report is</del></p> <ul style="list-style-type: none"> <li>i. <u>state that the service auditor's report is</u> intended solely for the</li> </ul>	<p><i>Use of the Service Auditor's Report</i></p> <p><del>8-A68-8.A67. 8-A68</del> Chapter 2 requires that the use of a practitioner's report be restricted to specified parties when the criteria used to</p>

<p>information and use of management of the service organization, user entities of the service organization's system during some or all of the period covered by the service auditor's report, and the auditors who audit and report on such user entities' financial statements <a href="#">or internal control over financial reporting</a></p> <p>ii. <a href="#">state that the service auditor's report is</a> not intended to be and should not be used by anyone other than the specified parties<sup>29</sup> (Ref: par. <del>8.A68</del>8.A67–<del>8.A71</del>8.A72)</p>	<p>evaluate or measure the subject matter are available only to specified parties or 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.<sup>30</sup> The criteria used for engagements to report on controls at a service organization are relevant only for the purpose of providing information about the service organization's system, including controls, to those who have an understanding of how the system is used for financial reporting by user entities and, accordingly, the service auditor's report states that the report and the description of tests of controls are intended only for use by management of the service organization, user entities of the service organization ("during some or all of the period covered by the report" for a type 2 report, and "as of the ending date of the period covered by the report" for a type 1 report), and their user auditors. (The illustrative service auditor's reports in exhibit A of this chapter illustrate language for a paragraph restricting the use of a service auditor's report.) (Ref: par. <del>8.38</del>8.39<i>m</i> and <del>8.39</del>8.40<i>m</i>)</p>
	<p><del>8.A69-8.A68.</del> <del>8.A69</del> Chapter 2 indicates that the need for restriction on the use of a report may result from a number of circumstances, including the potential for the report to be misunderstood when taken out of the context in which it was intended to be used, and the extent to which the procedures performed are known or understood.<sup>31</sup> (Ref: par. <del>8.38</del> 8.39<i>m</i>, and <del>8.39</del>8.40<i>m</i>)</p>
	<p><del>8.A70-8.A69.</del> <del>8.A70</del> Although the alert language in the service auditor's report restricts the use of the report, a service auditor is not responsible for controlling a service organization's distribution of a service auditor's report. A service auditor may inform the service organization of the</p>

<sup>29</sup> Paragraph 2.6463 or 2.6564 of chapter 2, if applicable.

<sup>30</sup> Paragraph 2.62 of chapter 2.

<sup>31</sup> Paragraph 2.A95 of chapter 2.

	<p>following:</p> <ul style="list-style-type: none"> <li>• A service auditor's type 1 report is not intended for distribution to parties other than the service organization, user entities of the service organization's system as of the end of the period covered by the service auditor's report, and their user auditors.</li> <li>• A service auditor's type 2 report is not intended for distribution to parties other than the service organization, user entities of the service organization's system during some or all of the period covered by the service auditor's report, and their user auditors.</li> </ul> <p>(Ref: par. <del>8-38</del>8.39m and <del>8-39</del>8.40m)</p>
	<p><del>8-A71-8.A70.</del> <del>8-A71</del>A user entity is also considered a user entity of the service organization's subservice organizations if controls at subservice organizations are relevant to internal control over financial reporting of the user entity. In such case, the user entity is referred to as an indirect or downstream user entity of the subservice organization. Consequently, an indirect or downstream user entity may be included in the group to whom use of the service auditor's report is restricted if controls at the service organization are relevant to internal control over financial reporting of such indirect or downstream user entity. (Ref: par. <del>8-38</del>8.39m and <del>8-39</del> 8.40m)</p>
	<p><del>8-A72-8.A71.</del> <u>In engagements in which the inclusive method is used, the users of a subservice organization's system that are not users of the service organization's system, are not user entities, as defined in paragraph 8.8s.</u> (Ref: par. 8.39m and 8.40m)</p> <p><del>8-A73-8.A72.</del> <u>Management of a subservice organization may be identified as a specified party and, if so, would be included in the alert language described in paragraphs 8.39m and 8.40m.</u>          (Ref: par. 8.39m and 8.40m)</p>

<p><del>nm</del>. The manual or printed signature of the service auditor's firm</p> <p><del>oa</del>. The city and state where the service auditor practices</p> <p><del>pe</del>. The date of the service auditor's report (<del>t</del>The report should be dated no earlier than the date on which the service auditor has obtained sufficient appropriate evidence on which to base the service auditor's opinion, including evidence that</p> <p><del>i</del> <del>the attestation documentation has been reviewed,</del></p> <p>ii. management's description of the service organization system has been prepared.</p> <p>iii management has provided a written assertion, <del>and,</del></p> <p>iii. <del>the attestation documentation has been reviewed)</del></p>	
<p><b>8.40.</b> A service auditor's type 1 report <i>should</i> include the following elements: (Ref: par. 8.A73)</p> <p>a. A title that includes the word <i>independent</i></p> <p>b. An appropriate addressee as required by the circumstances of the engagement</p> <p>c. Identification of <u>the following:</u></p> <p>i. <del>M</del>management's description of the service organization's system, the function performed by the system, and the specified date to which the description relates</p> <p>ii. <del>identification of T</del>the criteria against which the fairness of the</p>	<p><del>8.A74-8.A73-8.A72-</del>The list of report elements in paragraph <del>8.39</del>8.40 constitutes all of the required report elements for a service auditor's type 1 engagement, including the elements required by chapter 2.<sup>32</sup> Application guidance regarding the elements of an examination report is included in chapter 2.<sup>33</sup> (Ref: par. <del>8.39</del>8.40)</p>

<sup>32</sup> Paragraph 2.61–2.62 of chapter 2.

<sup>33</sup> Paragraphs 2.A75–2.A96 of chapter 2.

presentation of the description and the suitability of the design of the controls were evaluated

- iii. Any information included in a document containing the service auditor report that is not covered by the service auditor's report (Ref: par. 8-A598.A58)
- iv. Any services performed by a subservice organization and whether the carve-out method or the inclusive method was used in relation to them—depending on which method is used, the following *should* be included:
  - (1) If the carve-out method was used, a statement indicating that
    - (a) management's description of the service organization's system excludes the control objectives and related controls at relevant subservice organizations
    - (b) certain control objectives specified by the service organization can be achieved only if complementary subservice organization controls assumed in the design of the service organization's controls are suitably designed and operating effectively
    - (c) the service auditor's procedures do not extend to such complementary subservice organization controls (Ref: par. 8-A628.A61)
  - (2) If the inclusive method was used, a statement that management's description of the service organization's system includes the subservice organization's specified control objectives and related controls, and that the service auditor's procedures included procedures related to the

<p style="text-align: center;">subservice organization</p> <p><u>d.</u> <u>A statement that the controls and control objectives included in the description are those that management believes are likely to be relevant to user entities' internal control over financial reporting and the description does not include those aspects of the system that are not likely to be relevant to user entities' internal control over financial reporting</u></p>	
<p><u>ed.</u> If management's description of the service organization's system refers to the need for complementary user entity controls, a statement that the service auditor has not evaluated the suitability of the design or operating effectiveness of complementary user entity controls, and that the control objectives stated in the description can be achieved only if complementary user entity controls are suitably designed and operating effectively, along with the controls at the service organization</p> <p><u>fe.</u> A reference to management's assertion and a statement that management is responsible for</p> <ul style="list-style-type: none"> <li>i. preparing the description of the service organization's system and assertion, including the completeness, accuracy, and method of presentation of the description and assertion</li> <li>ii. providing the services covered by the description of the service organization's system</li> <li>iii. specifying the control objectives and stating them in the description of the service organization's system</li> <li>iv. identifying the risks that threaten the achievement of the control objectives</li> </ul>	

<ul style="list-style-type: none"> <li>v. selecting the criteria</li> <li>vi. designing, implementing, and documenting controls that are suitably designed and operating effectively to achieve the related control objectives stated in the description of the service organization's system</li> </ul>	
<p><u>gf.</u> A statement that the service auditor is responsible for expressing an opinion on the fairness of the presentation of management's description of the service organization's system and on the suitability of the design of the controls to achieve the related control objectives stated in the description, based on the service auditor's examination</p> <p><u>hg.</u> A statement that</p> <ul style="list-style-type: none"> <li>i. the examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants</li> <li>ii. those standards require that the service auditor plan and perform the examination to obtain reasonable assurance about whether, in all material respects, <u>based on the criteria in management's assertion</u>, management's description of the service organization's system is fairly presented and the controls are suitably designed as of the specified date to achieve the related control objectives, <del>based on the criteria in management's assertion</del></li> <li>iii. the service auditor believes the evidence obtained is sufficient and appropriate to provide a reasonable basis for the service auditor's opinion</li> </ul> <p><u>ih.</u> A statement that an examination of management's description of a</p>	

service organization's system and the suitability of the design of the service organization's controls to achieve the related control objectives stated in the description involves

- i. performing procedures to obtain evidence about the fairness of the presentation of the description and the suitability of the design of those controls to achieve the related control objectives stated in the description, based on the criteria in management's assertion
- ii. assessing the risks that management's description of the service organization's system is not fairly presented and that the controls were not suitably designed to achieve the related control objectives
- iii. evaluating the overall presentation of management's description of the service organization's system, suitability of the control objectives stated in the description, and suitability of the criteria specified by the service organization in its assertion

*jh.* A description of the inherent limitations of controls, including that projecting to the future any evaluation of the fairness of the presentation of management's description of the service organization's system or conclusions about the suitability of the design of the controls to achieve the related control objectives is subject to the risk that controls at a service organization may become ineffective

*kj.* A statement the service auditor has not performed any procedures regarding the operating effectiveness of controls and therefore expresses no opinion thereon

*lk.* The service auditor's opinion on whether, in all material respects,

<p>based on the criteria described in management's assertion,</p> <ul style="list-style-type: none"> <li>i. management's description of the service organization's system fairly presents the service organization's system that was designed and implemented as of the specified date</li> <li>ii. the controls related to the control objectives stated in management's description of the service organization's system were suitably designed to provide reasonable assurance that those control objectives would be achieved if the controls operated effectively as of the specified date</li> <li>iii. if the application of complementary user entity controls is necessary to achieve the related control objectives stated in management's description of the service organization's system, a statement to that effect</li> <li>iv. if the application of complementary subservice organization controls is necessary to achieve the related control objectives stated in management's description of the service organization's system, a statement to that effect</li> </ul>	
<p><u>m</u>. An alert in a separate paragraph <u>that restricts the use of the service auditor's report</u>; the alert should <del>state that the report is</del></p> <ul style="list-style-type: none"> <li>i. <u>state that the service auditor's report is</u> intended solely for the information and use of management of the service organization, user entities of the service organization's system as of the end of the period covered by the service auditor's report, and the auditors who audit and report on such user entities' financial statements <u>or internal control over financial reporting</u></li> </ul>	

<p>ii. <del>state that the service auditor's report is</del> not intended to be and should not be used by anyone other than the specified parties<sup>34</sup>          (Ref: par. <del>8-A688.A67-8-A718.A70</del>)</p>	
<p><del>nm.</del> The manual or printed signature of the service auditor's firm</p> <p><del>oa.</del> The city and state where the service auditor practices</p> <p><del>pe.</del> The date of the service auditor's report (<del>the</del> report should be dated no earlier than the date on which the service auditor has obtained sufficient appropriate evidence on which to base the service auditor's opinion, including evidence that</p> <p><del>i. the attestation documentation has been reviewed,</del></p> <p>ii. management's description of the service organization system has been prepared, <del>and</del></p> <p>iii management has provided a written assertion, <del>and</del>)</p> <p><del>iii the attestation documentation has been reviewed.)</del></p>	
<p><i>Modified Opinions</i></p> <p><b>8.41.</b> The service auditor's opinion <i>should</i> be modified and the service report <i>should</i> contain a clear description of all the reasons for the modification, if the service auditor concludes that, <u>based on the criteria in management's assertion,</u></p> <p>a. management's description of the service organization's system is not fairly presented, in all material respects,</p> <p>b. the controls are not suitably designed to provide reasonable assurance that the control objectives stated in management's description of the service organization's system would be</p>	<p><i>Modified Opinions</i></p> <p><b><u>8-A75-8.A74.</u></b> The AICPA guide <i>Service Organizations: Reporting on Controls at a Service Organization Relevant to User Entities' Internal Control Over Financial Reporting</i> contains examples of elements of modified service auditor's reports. (Ref. par: <del>8-408.41</del>)</p>

<sup>34</sup> Paragraph 2.63 or 2.64 of chapter 2, if applicable.

<p>achieved if the controls operated effectively, in all material respects,</p> <ul style="list-style-type: none"> <li>c. in the case of a type 2 report, the controls did not operate effectively throughout the specified period to achieve the related control objectives stated in management's description of the service organization's system, in all material respects, or</li> <li>d. the service auditor is unable to obtain sufficient appropriate evidence. (Ref. par: 8.A74)</li> </ul>	
<p><b>8.42.</b> If the service auditor plans to disclaim an opinion because of the inability to obtain sufficient appropriate evidence, and, based on the limited procedures performed, has concluded that, in all material respects, <u>based on the criteria in management's assertion,</u></p> <ul style="list-style-type: none"> <li>a. certain aspects of management's description of the service organization's system are not fairly presented,</li> <li>b. certain controls were not suitably designed to provide reasonable assurance that the control objectives stated in management's description of the service organization's system would be achieved if the controls operated effectively, or</li> <li>c. in the case of a type 2 report, certain controls did not operate effectively throughout the specified period to achieve the related control objectives stated in management's description of the service organization's system, then</li> </ul> <p>the service auditor <i>should</i> identify these findings in the service auditor's report.</p>	
<p><b>8.43.</b> If the service auditor plans to disclaim an opinion, the service auditor <i>should not</i> identify the procedures that were performed nor include statements describing the characteristics of a service auditor's</p>	

<p>engagement in the service auditor's report; to do so might overshadow the disclaimer.</p>	
<p><b>Other Communication Responsibilities</b></p> <p><del>8.44. If the service auditor becomes aware of incidents of noncompliance with laws and regulations, fraud, or uncorrected errors attributable to management or other service organization personnel that are not clearly trivial and that may affect one or more user entities, the service auditor should determine the effect of such incidents on management's assertion, management's description of the service organization's system, the achievement of the control objectives, and the service auditor's report. Additionally, In addition to the communication responsibilities in chapter 2, if the service auditor becomes aware of the matters identified in paragraph 8.33, the service auditor should determine whether this information has been communicated appropriately to affected user entities. If the information has not been so communicated, and management of the service organization is unwilling to do so, the service auditor should take appropriate action.<sup>35</sup> (Ref: par. 8.A75 and 2.66)</del></p> <p><b>The deleted portion of par. 8.44 was moved to new par. 8.33.</b></p>	<p><b>Other Communication Responsibilities</b></p> <p><del>8.A76-8.A75.</del> Actions that a service auditor may take when the service auditor becomes aware of noncompliance with laws and regulations, fraud, or uncorrected <u>misstatements errors</u> at the service organization (after giving additional consideration to instances in which the service organization has not appropriately communicated this information to affected user entities, and the service organization is unwilling to do so) include the following:</p> <ul style="list-style-type: none"> <li>• Obtaining legal advice about the consequences of different courses of action</li> <li>• Communicating with those charged with governance of the service organization</li> <li>• Disclaiming an opinion, modifying the service auditor's opinion, or adding an explanatory paragraph</li> <li>• Communicating with third parties, for example, a regulator, when required to do so</li> <li>• Withdrawing from the engagement (Ref: par. <del>8.43</del>8.44)</li> </ul>

<sup>35</sup> Paragraph 2.67 of chapter 2.

[8.A77-8.A76.](#)

## Exhibit A: Illustrative Service Auditor's Reports

The following illustrative reports contain text in boldface italics that would be added to the service auditor's report if the situation described in the text is applicable. These illustrative reports are for guidance only and are not intended to be exhaustive or applicable to all situations. The inclusion of report headings may be useful but is not required by this chapter or chapter 2.<sup>36</sup> The AICPA guide *Service Organizations: Reporting on Controls at a Service Organization Relevant to User Entities' Internal Control Over Financial Reporting* includes additional illustrative reports including reports with modified opinions.

### Example 1: Type 2 Service Auditor's Report

#### Independent Service Auditor's Report<sup>37</sup> on XYZ Service Organization's Description of its [*type or name of*] System and the Suitability of the Design and Operating Effectiveness of Controls

To: XYZ Service Organization

##### Scope

We have examined XYZ Service Organization's description of its [*type or name of*] system entitled "XYZ Service Organization's Description of its [*type or name of*] System" for processing user entities' transactions [*or identification of the function performed by the system*] throughout the period [*date*] to [*date*] (description) and the suitability of the design and operating effectiveness of controls included in the description to achieve the related control objectives also included in the description, based on the criteria identified in "XYZ Service Organization's Assertion" (assertion). The controls and control objectives included in the description are those that [management of XYZ Service Organization believes](#) are likely to be relevant to user entities' internal control over financial reporting ~~and~~ the description ~~of its system (including relevant control objectives and related controls)~~ does not include those aspects of the [*type or name of*] system that are not likely to be relevant to user entities' internal control over financial reporting, ~~and our examination did not extend to such aspects of the system.~~

*[A statement such as the following is added to the report when information that is not covered by the service auditor's report is included in the description of the service organization's system.]*

<sup>36</sup> Paragraph 2.A73 of chapter 2, "Examination Engagements."

<sup>37</sup> May also be "Report of Independent Service Auditors"

***The information included in [section number where the other information is presented], “Other Information Provided by XYZ Service Organization” is presented by management of XYZ Service Organization to provide additional information and is not a part of XYZ Service Organization’s description of its [name or type of] system made available to user entities during the period [date] to [date]. Information about XYZ Service Organization’s [describe the nature of the information, for example, business continuity planning, privacy practices, and so on] has not been subjected to the procedures applied in the examination of the description of the [name or type of] system and of the suitability of the design and operating effectiveness of controls to achieve the related control objectives stated in the description of the [name or type of] system.***

*[A statement such as the following is added to the report when the service organization uses a subservice organization, the carve-out method is used to present the subservice organization, and complementary subservice organization controls are required to meet the control objectives.]*

***XYZ Service Organization uses a subservice organization to [identify the function or service provided by the subservice organization]. The description includes only the control objectives and related controls of XYZ Service Organization and excludes the control objectives and related controls of the subservice organization. The description also indicates that certain control objectives specified by XYZ Service Organization can be achieved only if complementary subservice organization controls assumed in the design of XYZ Service Organization’s controls are suitably designed and operating effectively, along with the related controls at XYZ Service Organization. Our examination did not extend to controls of the subservice organization and we have not evaluated the suitability of the design or operating effectiveness of such complementary subservice organization controls.***

*[A statement such as the following is added to the report when complementary user entity controls are required to meet the control objectives.]*

***The description indicates that certain control objectives specified in the description can be achieved only if complementary user entity controls assumed in the design of XYZ Service Organization’s controls are suitably designed and operating effectively, along with related controls at the service organization. Our examination did not extend to such complementary user entity controls and we have not evaluated the suitability of the design or operating effectiveness of such complementary user entity controls.***

#### *Service Organization’s Responsibilities*

In [section number where the assertion is presented], XYZ Service Organization has provided an assertion about the fairness of the presentation of the description and suitability of the design and operating effectiveness of the controls to achieve the related control objectives stated in the description. XYZ Service Organization is responsible for preparing the description and its assertion, including the

completeness, accuracy, and method of presentation of the description and the assertion, providing the services covered by the description, specifying the control objectives and stating them in the description, identifying the risks that threaten the achievement of the control objectives, selecting the criteria stated in the assertion, and designing, implementing, and documenting controls that are suitably designed and operating effectively to achieve the related control objectives stated in the description.

#### *Service Auditor's Responsibilities*

Our responsibility is to express an opinion on the fairness of the presentation of the description and on the suitability of the design and operating effectiveness of the controls to achieve the related control objectives stated in the description, based on our examination.

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. Those standards require that we plan and perform the examination to obtain reasonable assurance about whether, in all material respects, [based on the criteria in management's assertion](#), the description is fairly presented and the controls were suitably designed and operating effectively to achieve the related control objectives stated in the description throughout the period [date] to [date], [based on the criteria referenced above](#). We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

An examination of a description of a service organization's system and the suitability of the design and operating effectiveness of controls involves

- performing procedures to obtain evidence about the fairness of the presentation of the description and the suitability of the design and operating effectiveness of the controls to achieve the related control objectives stated in the description, based on the criteria referenced above.
- assessing the risks that the description is not fairly presented and that the controls were not suitably designed or operating effectively to achieve the related control objectives stated in the description.
- testing the operating effectiveness of those controls that management considers necessary to provide reasonable assurance that the related control objectives stated in the description were achieved.
- evaluating the overall presentation of the description, suitability of the control objectives stated therein, and suitability of the criteria specified by the service organization in its assertion.

#### *Inherent Limitations*

The description is prepared to meet the common needs of a broad range of user entities and their auditors who audit and report on user entities' financial statements and may not, therefore, include every aspect of the system that each individual user entity may consider

important in its own particular environment. Because of their nature, controls at a service organization may not prevent, or detect and correct, all [misstatements errors or omissions](#) in processing or reporting transactions [*or identification of the function performed by the system*]. Also, the projection to the future of any evaluation of the fairness of the presentation of the description, or conclusions about the suitability of the design or operating effectiveness of the controls to achieve the related control objectives is subject to the risk that controls at a service organization may become ineffective .

#### *Description of Tests of Controls*

The specific controls tested and the nature, timing, and results of those tests are listed in [*section number where the description of tests of controls is presented*].

#### *Opinion*

In our opinion, in all material respects, based on the criteria described in XYZ Service Organization's assertion,

- a. the description fairly presents the [*type or name of*] system that was designed and implemented throughout the period [*date*] to [*date*].
- b. the controls related to the control objectives stated in the description were suitably designed to provide reasonable assurance that the control objectives would be achieved if the controls operated effectively throughout the period [*date*] to [*date*] **and subservice organizations and user entities applied the complementary controls assumed in the design of XYZ Service Organization's controls throughout the period [*date*] to [*date*].**
- c. the controls operated effectively to provide reasonable assurance that the control objectives stated in the description were achieved throughout the period [*date*] to [*date*] **if complementary subservice organization and user entity controls assumed in the design of XYZ Service Organization's controls operated effectively throughout the period [*date*] to [*date*].**

#### *Restricted Use*

This report, including the description of tests of controls and results thereof in [*section number where the description of tests of controls is presented*], is intended solely for the information and use of XYZ Service Organization, user entities of XYZ Service Organization's [*type or name of*] system during some or all of the period [*date*] to [*date*], and their auditors who audit and report on such user entities' financial statements [or internal control over financial reporting](#) and have a sufficient understanding to consider it, along with other information including information about controls implemented by user entities themselves, when assessing the risks of material misstatement of user entities' financial statements. This report is not intended to be and should not be used by anyone other than these specified parties.

[*Service auditor's signature*]

[Service auditor's city and state]  
[Date of the service auditor's report]

## Example 2: Type 1 Service Auditor's Report

### Independent Service Auditor's Report<sup>38</sup> on XYZ Service Organization's Description of its [type or name of] System and the Suitability of the Design of Controls

To: XYZ Service Organization

We have examined XYZ Service Organization's description of its [type or name of] system entitled "XYZ Service Organization's Description of its [type or name of] System" for processing user entities' transactions [or identification of the function performed by the system] as of [date] (description) and the suitability of the design of controls included in the description to achieve the related control objectives, also included in the description, based on the criteria identified in "XYZ Service Organization's Assertion" (assertion). The controls and control objectives included in the description are those that management of XYZ Service Organization believes are likely to be relevant to user entities' internal control over financial reporting and. ~~The description of its system (including relevant control objectives and related controls)~~ does not include those aspects of the [type or name of] system that are not likely to be relevant to user entities' internal control over financial reporting ~~and our examination did not extend to such aspects of the system.~~

[A statement such as the following is added to the report when information that is not covered by the service auditor's report is included in the description of the service organization's system.]

**The information included in [section number where the other information is presented], "Other Information Provided by XYZ Service Organization," is presented by management of XYZ Service Organization to provide additional information and is not a part of XYZ Service Organization's description of its [name or type of] system made available to user entities as of [date]. Information about XYZ Service Organization's [describe the nature of the information, for example, business continuity planning, privacy practices, and so on] has not been subjected to the procedures applied in the examination of the description of the [name or type of] system and of the suitability of the design of controls to achieve the related control objectives stated in the description of the [name or type of] system.**

[A statement such as the following is added to the report when the service organization uses a subservice organization, the carve-out

<sup>38</sup> <sup>36</sup>May also be "Report of Independent Service Auditors."

*method is used to present the subservice organization, and complementary subservice organization controls are required to meet the control objectives.]*

***XYZ Service Organization uses a subservice organization to [identify the function or service provided by the subservice organization]. The description includes only the control objectives and related controls of XYZ Service Organization and excludes the control objectives and related controls of the subservice organization. The description also indicates that certain control objectives specified by XYZ Service Organization can be achieved only if complementary subservice organization controls assumed in the design of XYZ Service Organization's controls are suitably designed and operating effectively, along with the related controls at XYZ Service Organization. Our examination did not extend to controls of the subservice organization and we have not evaluated the design or operating effectiveness of such complementary subservice organization controls.***

*[A statement such as the following is added to the report when complementary user entity controls are required to meet the control objectives.]*

***The description indicates that certain control objectives specified in the description can be achieved only if complementary user entity controls assumed in the design of XYZ Service Organization's controls are suitably designed and operating effectively, along with related controls at the service organization. Our examination did not extend to such complementary user entity controls and we have not evaluated the suitability of the design or operating effectiveness of such complementary user entity controls.***

#### *Service Organization's Responsibilities*

In [section number where assertion is presented], XYZ Service Organization has provided an assertion about the fairness of the presentation of the description and suitability of the design of the controls to achieve the related control objectives stated in the description. XYZ Service Organization is responsible for preparing the description and its assertion, including the completeness, accuracy, and method of presentation of the description and the assertion, providing the services covered by the description, specifying the control objectives and stating them in the description, identifying the risks that threaten the achievement of the control objectives, selecting the criteria stated in the assertion, and designing, implementing, and documenting controls that are suitably designed and operating effectively to achieve the related control objectives stated in the description.

#### *Service Auditor's Responsibilities*

Our responsibility is to express an opinion on the fairness of the presentation of the description and on the suitability of the design of the controls to achieve the related control objectives stated in the description, based on our examination.

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. Those standards require that we plan and perform the examination to obtain reasonable assurance about whether in all material respects, [based on the criteria in management's assertion](#), the description is fairly presented and the controls were suitably designed to achieve the related control objectives stated in the description as of [date], ~~based on the criteria referenced above~~. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

An examination of a description of a service organization's system and the suitability of the design of controls involves

- performing procedures to obtain evidence about the fairness of the presentation of the description and the suitability of the design of the controls to achieve the related control objectives stated in the description, ~~based on the criteria referenced above~~.
- assessing the risks that the description is not fairly presented and that the controls were not suitably designed to achieve the related control objectives stated in the description.
- evaluating the overall presentation of the description, suitability of the control objectives stated therein, and suitability of the criteria specified by the service organization in its assertion.

#### *Inherent Limitations*

The description is prepared to meet the common needs of a broad range of user entities and their auditors who audit and report on user entities' financial statements and may not, therefore, include every aspect of the system that each individual user entity may consider important in its own particular environment. Because of their nature, controls at a service organization may not prevent, or detect and correct, all [misstatements, errors or omissions](#) in processing or reporting transactions [*or identification of the function performed by the system*]. Also, the projection to the future of any evaluation of the fairness of the presentation of the description, or conclusions about the suitability of the design of the controls to achieve the related control objectives is subject to the risk that controls at a service organization may become ineffective.

#### *Other Matter*

We did not perform any procedures regarding the operating effectiveness of controls stated in the description and accordingly do not express an opinion thereon.

#### *Opinion*

In our opinion, in all material respects, based on the criteria described in XYZ Service Organization's assertion,

- a. the description fairly presents the [*type or name of*] system that was designed and implemented as of [date].

- b. the controls related to the control objectives stated in the description were suitably designed to provide reasonable assurance that the control objectives would be achieved if the controls operated effectively as of [date] **and subservice organizations and user entities applied the complementary controls assumed in the design of XYZ Service Organization's controls as of [date].**

*Restricted Use*

This report is intended solely for the information and use of XYZ Service Organization, user entities of XYZ Service Organization's [type or name of] system as of [date], and their auditors who audit and report on such user entities' financial statements [or internal control over financial reporting](#) and have a sufficient understanding to consider it, along with other information including information about controls implemented by user entities themselves, when assessing the risks of material misstatements of user entities' financial statements. This report is not intended to be and should not be used by anyone other than these specified parties.

[Service auditor's signature]

[Service auditor's city and state]

[Date of the service auditor's report]

[8.A78-8.A77.](#)

## Exhibit B: Illustrative Assertions by Management of a Service Organization

Paragraph [8.98.10b\(vi\)](#) indicates that one of the preconditions for a service auditor to accept or continue an engagement is that management acknowledge and accept responsibility for providing a written assertion that accompanies management's description of the service organization's system. Paragraph [8.A198.A18](#) indicates that the service organization has the option of attaching the assertion to the description of the service organization's system or including it in the description and clearly segregating the assertion from the description, for example, through the use of headings. Segregating the assertion from the description clarifies that the assertion is not part of the description.

The following illustrative management assertions contain text in boldface italics that would be added to management's assertion if the situation described in the text is applicable. These illustrative assertions are for guidance only and are not intended to be exhaustive or applicable to all situations.

### Example 1: Assertion by Management of a Service Organization for a Type 2 Report

#### XYZ Service Organization's Assertion

We have prepared the description of XYZ Service Organization's [*type or name of*] system entitled "XYZ Service Organization's Description of its [*type or name of*] System" for processing user entities' transactions [*or identification of the function performed by the system*] throughout the period [*date*] to [*date*] (description) for user entities of the system during some or all of the period [*date*] to [*date*], and their auditors who audit and report on such user entities' financial statements [or internal control over financial reporting](#) and have a sufficient understanding to consider it, along with other information, ***including information about controls implemented by subservice organizations and user entities of the system themselves***, when assessing the risks of material misstatement of user entities' financial statements.

*[A statement such as the following is added to the assertion when the service organization uses a subservice organization, the carve-out method is used to present the subservice organization, and complementary subservice organization controls are required to meet the control objectives.]*

***XYZ Service Organization uses a subservice organization to [identify the function or service provided by the subservice organization]. The description includes only the control objectives and related controls of XYZ Service Organization and excludes the control objectives and related controls of the subservice organization. The description also indicates that certain***

***control objectives specified in the description can be achieved only if complementary subservice organization controls assumed in the design of our controls are suitably designed and operating effectively, along with the related controls. The description does not extend to controls of the subservice organization.***

[A statement such as the following is added to the report when complementary user entity controls are required to meet the control objectives.]

***The description indicates that certain control objectives specified in the description can be achieved only if complementary user entity controls assumed in the design of XYZ Service Organization's controls are suitably designed and operating effectively, along with related controls at the service organization. The description does not extend to controls of the user entities.***

We confirm, to the best of our knowledge and belief, that

- a. the description fairly presents the [*type or name of*] system made available to user entities of the system during some or all of the period [*date*] to [*date*] for processing their transactions [*or identification of the function performed by the system*] as it relates to controls that are likely to be relevant to user entities' internal control over financial reporting. The criteria we used in making this assertion were that [the description](#)
- i. ~~the description~~ presents how the system made available to user entities of the system was designed and implemented to process relevant user entity transactions, including, if applicable,
  - (1) the types of services provided including, as appropriate, the classes of transactions processed.
  - (2) the procedures, within both automated and manual systems, by which those services are provided, including, as appropriate, procedures by which transactions are initiated, authorized, recorded, processed, corrected as necessary, and transferred to the reports and other information prepared for user entities of the system.
  - (3) the information used in the performance of the procedures including, if applicable, related accounting records, whether electronic or manual, and supporting information involved in initiating, authorizing, recording, processing, and reporting transactions; this includes the correction of incorrect information and how information is transferred to the reports and other information prepared for user entities.
  - (4) how the system captures and addresses significant events and conditions other than transactions.

- (5) the process used to prepare reports and other information for user entities.
  - (6) services performed by a subservice organization, if any, including whether the inclusive method or the carve-out method has been used in relation to them.
  - (7) the specified control objectives and controls designed to achieve those objectives, including as applicable, complementary user entity controls and complementary subservice organization controls assumed in the design of the service organization's controls.
  - (8) other aspects of our control environment, risk assessment process, information and communication systems (including the related business processes), control activities, and monitoring activitiescontrols that are relevant to the services provided.
- ii. includes relevant details of changes to the service organization's system during the period covered by the description.
  - iii. does not omit or distort information relevant to the service organization's system, while acknowledging that the description is prepared to meet the common needs of a broad range of user entities of the system and their user auditors, and may not, therefore, include every aspect of the [*type or name of*] system that each individual user entity of the system and its auditor may consider important in its own particular environment.
- b. the controls related to the control objectives stated in the description were suitably designed and operating effectively throughout the period [*date*] to [*date*] to achieve those control objectives ***if subservice organizations and user entities applied the complementary controls assumed in the design of XYZ Service Organization's controls throughout the period [date] to [date]***. The criteria we used in making this assertion were that
- i. the risks that threaten the achievement of the control objectives stated in the description have been identified by management of the service organization.
  - ii. the controls identified in the description would, if operating effectively, provide reasonable assurance that those risks would not prevent the control objectives stated in the description from being achieved.
  - iii. the controls were consistently applied as designed, including whether manual controls were applied by individuals who have the appropriate competence and authority.

## Example 2: Assertion by Management of a Service Organization for a Type 1 Report

### XYZ Service Organization's Assertion

We have prepared the description of XYZ Service Organization's [*type or name of*] system entitled "XYZ Service Organization's Description of its [*type or name of*] System" for processing user entities' transactions [*or identification of the function performed by the system*] as of [*date*] (description) for user entities of the system as of [*date*], and their auditors who audit and report on such user entities' financial statements [or internal control over financial reporting](#) and- have a sufficient understanding to consider it, along with other information including information about controls **implemented by subservice organizations and user entities themselves**, when obtaining an understanding of user entities' information and communication systems relevant to financial reporting.

[*A statement such as the following is added to the assertion when the service organization uses a subservice organization, the carve-out method is used to present the subservice organization, and complementary subservice organization controls are required to meet the control objectives.*]

**XYZ Service Organization uses a subservice organization to [*identify the function or service provided by the subservice organization*]. The description includes only the control objectives and related controls of XYZ Service Organization and excludes the control objectives and related controls of the subservice organization(s). The description also indicates that certain control objectives specified in the description can be achieved only if complementary subservice organization controls assumed in the design of our controls are suitably designed and operating effectively, along with the related controls. The description does not extend to controls of the subservice organization.**

[*A statement such as the following is added to the report when complementary user entity controls are required to meet the control objectives.*]

**The description indicates that certain control objectives specified in the description can be achieved only if complementary user entity controls assumed in the design of XYZ Service Organization's controls are suitably designed and operating effectively, along with related controls at the service organization. The description does not extend to controls of the user entities.**

We confirm, to the best of our knowledge and belief, that

- a. the description fairly presents the [*type or name of*] system made available to user entities of the system as of [*date*] for

processing their transactions [*or identification of the function performed by the system*], as it relates to controls that are likely to be relevant to user entities' internal control over financial reporting. The criteria we used in making this assertion were that the description

- i. presents how the system made available to user entities of the system was designed and implemented to process relevant transactions, including, if applicable
  - (1) the types of services provided including, as appropriate, the classes of transactions processed.
  - (2) the procedures, within both automated and manual systems, by which those services are provided, including, as appropriate, procedures by which transactions are initiated, authorized, recorded, processed, corrected as necessary, and transferred to the reports and other information prepared for user entities of the system.
  - (3) the information used in the performance of the procedures including, if applicable, related accounting records, whether electronic or manual, and supporting information involved in initiating, authorizing, recording, processing, and reporting transactions; this includes the correction of incorrect information and how information is transferred to the reports and other information prepared for user entities.
  - (4) how the system captures and addresses significant events and conditions, other than transactions.
  - (5) the process used to prepare reports and other information for user entities.
  - (6) services performed by a subservice organization, if any, including whether the inclusive method or the carve-out method has been used in relation to them.
  - (7) the specified control objectives and controls designed to achieve those objectives, including as applicable, complementary user entity controls [and complementary subservice organization controls assumed in the design of the service organization's controls](#).
  - (8) other aspects of our control environment, risk assessment process, information and communication systems (including the related business processes), control activities, and monitoring [activitiescontrols](#) that are relevant to the services provide.
- ii. does not omit or distort information relevant to the service organization's system, while acknowledging that the description is

prepared to meet the common needs of a broad range of user entities of the system and their user auditors, and may not, therefore, include every aspect of the [type or name of] system that each individual user entity of the system and its auditor may consider important in its own particular environment

- b. the controls related to the control objectives stated in the description were suitably designed as of [date] to achieve those control objectives ***if subservice organizations and user entities applied the complementary controls assumed in the design of XYZ Service Organization's controls as of [date]***. The criteria we used in making this assertion were that
  - i. the risks that threaten the achievement of the control objectives stated in the description have been identified by management of the service organization.
  - ii. the controls identified in the description would, if operating effectively, provide reasonable assurance that those risks would not prevent the control objectives stated in the description from being achieved.