



## Agenda Item 2D

A280.

### Appendix G — Amendments to Various Statements on Auditing Standards (SAS), as Amended, and to Various Sections in SAS No. 122, *Statements on Auditing Standards: Clarification and Recodification*, as Amended

(*Boldface italics* denotes new language. Deleted text is shown in ~~strike~~through.)

#### ~~Amendment to SAS No. 117, *Compliance Audits, as Amended* (AICPA, *Professional Standards, AU-C sec. 935*)~~

~~1. The amendment to AU-C section 935 in this appendix is effective for audits of financial statements for periods ending on or after December 15, 2023.~~

**Commented [MM1]:** As agreed to by the Board at its July meeting, amendments to AU-C section 935 will be made as part of a separate project.

#### ~~Amendment to SAS No. 136, *Forming an Opinion and Reporting on Financial Statements of Employee Benefit Plans Subject to ERISA* (AICPA, *Professional Standards, AU-C sec. 703*)~~

~~2. The amendment to AU-C section 703 in this appendix is effective for audits of financial statements for periods ending on or after December 15, 2023.~~

**Commented [MM2]:** Moved and reordered amendments.

#### *AU-C section 703, **Forming an Opinion and Reporting on Financial Statements of Employee Benefit Plans Subject to ERISA***

[No amendment to paragraphs .01-.17.]

~~.18 Section 315, *Understanding the Entity and Its Environment and Assessing the Risks of Material Misstatement*, addresses the auditor's responsibility to identify and assess the risks of material misstatement in the financial statements through understanding the entity and its environment, **the applicable financial reporting framework, and including its** the entity's internal control. The plan instrument is essential to understanding the plan and identifying and performing audit procedures that are responsive to assessed risks. (Ref: par. A18-A21)~~

[No amendment to paragraphs .19-.A18.]

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~~.A19—Obtaining an understanding of the plan and its environment, *the applicable financial reporting framework, and its* including its internal control, is a continuous, dynamic process of gathering, updating, and analyzing information throughout the audit. The auditor’s understanding of the plan establishes a frame of reference for planning the audit and exercising professional judgment throughout the audit when the auditor does the following:~~

~~[No further amendment to AU-C section 703.]~~

**Amendment to SAS No. 142, *Audit Evidence* (AICPA, *Professional Standards*, AU-C sec. 500)**

3. The amendment to AU-C section 500 in this appendix is effective for audits of financial statements for periods ending on or after December 15, 2023.

**AU-C section 500, *Audit Evidence***

~~[No amendment to paragraphs .01–.A66.]~~

**Appendix A—Considerations Regarding the Use of External Information Sources (Ref: par. .A12b)**

~~.A67~~

~~...~~

~~8. The nature and extent of the auditor’s consideration takes into account the assessed risks of material misstatement at the assertion level to which the use of the external information is relevant, the degree to which the use of that information is relevant to the reasons for the assessed risks of material misstatement, and the possibility that the information from the external information source may not be reliable (for example, whether it is from a credible source). Based on the auditor’s consideration of the matters described in paragraph 5 of this appendix, the auditor may determine that~~

- ~~1. a. further understanding of the entity and its environment, *the applicable financial reporting framework, and* including it’s the *entity’s system of* internal control, is needed, in accordance with section 315, *Understanding the Entity and Its Environment and Assessing the Risks of Material Misstatement*, or~~

~~...~~

~~[No further amendment to AU-C section 500.]~~

**Amendments to Various Sections in SAS No. 122, as Amended (AICPA, *Professional Standards*, AU-C secs. 200, 210, 230, 240, 250, 260, 265, 330, 402, 501, 505, 530, 550, 600, 620, 805 and 930)**

**AU-C Section 200, *Overall Objectives of the Independent Auditor and the Conduct of an Audit in Accordance With Generally Accepted Auditing Standards***

1. The amendment to AU-C section 200 is effective for audits of financial statements for periods ending on or after December 15, 2023.

[No amendment to paragraphs .01–.07.]

**An Audit of Financial Statements**

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**.08** GAAS contain objectives, requirements, and application and other explanatory material that are designed to support the auditor in obtaining reasonable assurance. GAAS require that the auditor exercise professional judgment and maintain professional skepticism throughout the planning and performance of the audit and, among other things

- identify and assess risks of material misstatement, whether due to fraud or error, based on an understanding of the entity and its environment, **the applicable financial reporting framework, and including the entity's system of internal control.**
- obtain sufficient appropriate audit evidence about whether material misstatements exist, through designing and implementing appropriate responses to the assessed risks.
- form an opinion on the financial statements, or determine that an opinion cannot be formed, based on an evaluation of the audit evidence obtained.

[No amendment to paragraphs .09–.13.]

**Definitions**

**.14** For purposes of GAAS, the following terms have the meanings attributed as follows:

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**Risk of material misstatement.** The risk that the financial statements are materially misstated prior to the audit. This consists of two components, described as follows at the assertion level: *(Ref: par. .A15)*

**Inherent risk.** The susceptibility of an assertion about a class of transaction, account balance, or disclosure to a misstatement that could be material, either individually or when aggregated with other misstatements, before consideration of any related controls.

**Control risk.** The risk that a misstatement that could occur in an assertion about a class of transactions, account balance, or disclosure and that could be material, either individually or when aggregated with other misstatements, will not be prevented, or detected and corrected, on a timely basis by the entity's *system of* internal control.

[No further amendment to paragraph .14; no amendment to paragraphs .15–.A14.]

## Definitions

### *Risk of Material Misstatement*

*.A15 For purposes of GAAS, a risk of material misstatement exists when*

- a. there is a reasonable possibility of a misstatement occurring (that is, its likelihood), and*
- b. if it were to occur, there is a reasonable possibility of the misstatement being material (that is, its magnitude).*

[No amendment to former paragraphs .A15–.A45, which are renumbered as paragraphs .A16–.A46.]

## Sufficient Appropriate Audit Evidence and Audit Risk

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### *Audit Risk*

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### *Risks of Material Misstatement*

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~~.A43 .A44~~ Inherent risk is *influenced by inherent risk factors*. ~~higher for some assertions and related classes of transactions, account balances, and disclosures than for others.~~ *Depending on the degree to which the inherent risk factors affect the susceptibility of an assertion to misstatement of an assertion, the level of inherent risk varies on a scale that is referred to as the spectrum of inherent risk. The auditor*

Commented [MM3]: Aligned language/format throughout.

*determines significant classes of transactions, account balances, and disclosures, and their relevant assertions, as part of the process of identifying and assessing the risks of material misstatement.* For example, it may be higher for complex calculations or for accounts ~~balances~~ consisting of amounts derived from accounting estimates that are subject to significant estimation uncertainty *may be identified as significant account balances, and the auditor's assessment of inherent risk for the related risks at the assertion level may be higher because of the high estimation uncertainty.* External circumstances giving rise to business risks may also influence inherent risk. For example, technological developments might make a particular product obsolete, thereby causing inventory to be more susceptible to overstatement. Factors in the entity and its environment that relate to several or all of the classes of transactions, account balances, or disclosures may also influence the inherent risk related to a specific assertion. Such factors may include, for example, a lack of sufficient working capital to continue operations or a declining industry characterized by a large number of business failures.

**Commented [AM4]:** From Linda - strikethrough "s" as an amendment

**A44 .A45** Control risk is a function of the effectiveness of the design, implementation, and maintenance of ~~internal~~ controls by management to address identified risks that threaten the achievement of the entity's objectives relevant to preparation and fair presentation of the entity's financial statements. However, internal control, no matter how well designed and operated, can only reduce, but not eliminate, risks of material misstatement in the financial statements, because of the inherent limitations of ~~internal~~ controls. These include, for example, the possibility of human errors or mistakes, or of controls being circumvented by collusion or inappropriate management override. Accordingly, some control risk will always exist. GAAS provide the conditions under which the auditor is required to, or may choose to, test the operating effectiveness of controls in determining the nature, timing, and extent of substantive procedures to be performed. <sup>fn 15</sup>

<sup>fn 15</sup> [Footnote omitted for purposes of this SAS.]

**.A45 .A46** The assessment of the risks of material misstatement may be expressed in quantitative terms or in nonquantitative terms. In any case, the need for the auditor to make appropriate risk assessments is more important than the different approaches by which they may be made. GAAS typically do not ordinarily refer to inherent risk and control risk separately, but rather to a combined assessment of the risks of material misstatement, rather than inherent risk and control risk separately. However, SAS No. 145, AU-C section 315 section 540, Auditing Accounting Estimates and Related Disclosures,<sup>16</sup> requires a separate assessment of inherent risk to be assessed separately and from control risk to provide a basis for designing and performing audit procedures to respond to the assessed risks of material misstatement at the relevant assertion level in accordance with AU-C section 330. <sup>fn 17, fn 18</sup> In identifying and assessing risks of material misstatement for significant classes of transactions, account balances, or disclosures other than accounting estimates, the auditor may make separate or combined assessments of inherent and control risk depending on preferred audit techniques or methodologies and practical considerations. The assessment of the risks of material misstatement may be expressed in quantitative terms or in nonquantitative terms. <sup>fn 15</sup> In any case, the need for

**Commented [HH5]:** Not a conforming amendment. Edit was to align to SAS 143.

**Commented [MM6]:** AU-C section 330 uses "relevant" assertion level

~~the auditor to make appropriate risk assessments is more important than the different approaches by which they may be made.~~

~~<sup>fn 16</sup> Paragraph .15 of section 540, *Auditing Accounting Estimates and Related Disclosures*~~

~~<sup>fn 16 17</sup> [Footnote omitted for purposes of this SAS.]~~

~~<sup>fn 18</sup> Paragraphs A227–A239 of SAS No. 145 address assessing risk and paragraphs A248–A252 of SAS No. 145 address assessing control risk.~~

~~*.A47 Risks of material misstatement are assessed at the assertion level in order to determine the nature, timing, and extent of further audit procedures necessary to obtain sufficient appropriate audit evidence.* <sup>fn 19</sup>~~

~~<sup>fn 19</sup> Paragraph .06 of AU-C section 330.~~

[Subsequent footnotes renumbered. No amendment to former paragraphs .A46–.A64, which are renumbered as paragraphs .A48–.A66.]

#### Conduct of an Audit in Accordance With GAAS

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#### Contents of GAAS

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~~A65 .A67~~ When necessary, the application and other explanatory material provides further explanation of the requirements of an AU-C section and guidance for carrying them out. In particular, it may

- Explain more precisely what a requirement means or is intended to cover, *including, in some AU-C sections, such as ~~SAS No. 145~~ AU-C section 315, why a procedure is required.*
- Include examples of procedures that may be appropriate in the circumstances.

Although such guidance does not in itself impose a requirement, it is relevant to the proper application of the requirements of an AU-C section. The auditor is required by paragraph .21 to understand the application and other explanatory material; how the auditor applies the guidance in the engagement depends on the exercise of professional judgment in the circumstances consistent with the objective of the AU-C section. The words "may," "might," and "could" are used to describe these actions and procedures. The application and other explanatory material may also provide background information on matters addressed in an AU-C section.

[No amendment to renumbered paragraphs .A68–.A71.]

*Considerations Specific to Smaller, Less Complex Entities Scalability Considerations*

*.A72 Scalability considerations have been included in some AU-C sections (for example, [SAS No. 145](#)~~AU-C section 315~~) to illustrate the application of the requirements to all entities, ~~whose~~ regardless of whether their nature and circumstances are less complex, ~~as well as those that are~~ or more complex. Less complex entities are entities for which the characteristics in paragraph .A73 apply.*

~~A70~~.A73 For purposes of specifying additional considerations to audits of smaller, less complex entities, a *smaller, less complex entity* refers to an entity that typically possesses qualitative characteristics, such as the following:

- a. Concentration of ownership and management in a small number of individuals; and
- b. One or more of the following:
  - i. Straightforward or uncomplicated transactions
  - ii. Simple record keeping
  - iii. Few lines of business and few products within business lines
  - iv. *Simpler systems of* ~~Few~~ internal controls
  - v. Few levels of management with responsibility for a broad range of controls
  - vi. Few personnel, many having a wide range of duties

**Commented [LCD7]:** Added "s" to align with GAAS wording. Added strikethrough to "s" as an amendment.

These qualitative characteristics are not exhaustive, they are not exclusive to smaller, less complex entities, and smaller, less complex entities do not necessarily display all of these characteristics.

*Considerations Specific to Automated Tools and Techniques*

*.A74 The considerations specific to "automated tools and techniques" included in some AU-C sections (for example, [SAS No. 145](#)~~AU-C section 315~~) have been developed to explain how the auditor may apply certain requirements when using automated tools and techniques in performing audit procedures.*

[Former paragraphs .A71–.A87 are renumbered as paragraphs .A75–.A91.

[No further amendment to AU-C section 200.]

**AU-C Section 210, Terms of Engagement**

2. The amendment to AU-C section 210 is effective for audits of financial statements for periods ending on or after December 15, 2023.

[No amendment to paragraphs .01–.A15.]

**Preconditions for an Audit**

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***Agreement of the Responsibilities of Management***

...

***Internal Control***

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**.A16** Management has the responsibility to determine what internal control is necessary to enable the preparation and fair presentation of the financial statements. The term internal control encompasses a wide range of activities within components ***of the system of internal control*** that may be described as the control environment; the entity’s risk assessment process; ***the entity’s process to monitor the system of internal control***, the information system, ~~including the related business processes relevant to financial reporting,~~ and communication; ***and*** control activities; ~~and monitoring of controls.~~ This division, however, does not necessarily reflect how a particular entity may design, implement, and maintain its internal control or how it may classify any particular component. <sup>fn 9</sup> An entity’s internal control will reflect the needs of management, the complexity of the business, the nature of the risks to which the entity is subject, and relevant laws or regulations.

<sup>fn 9</sup> [Footnote omitted for purposes of this SAS.]

[No further amendment to AU-C section 210.]

**AU-C Section 230, *Audit Documentation***

3. The amendment to AU-C section 230 is effective for audits of financial statements for periods ending on or after December 15, 2023.

[No amendment to paragraphs .01–.A19.]

**Documentation of the Audit Procedures Performed and Audit Evidence Obtained**



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***Identification of Specific Items or Matters Tested and of the Preparer and the Reviewer***

...

***Considerations Specific to Smaller, Less Complex Entities***

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**.A20** When preparing audit documentation, the auditor of a smaller, less complex entity may also find it helpful and efficient to record various aspects of the audit together in a single document, with cross-references to supporting working papers as appropriate. Examples of matters that may be documented together in the audit of a smaller, less complex entity include the understanding of the entity and its ***environment, the applicable financial reporting framework, and the entity's system of*** internal control; the overall audit strategy and audit plan; materiality; assessed risks, significant findings or issues noted during the audit; and conclusions reached.

[No further amendment to AU-C section 230.]

**AU-C Section 240, Consideration of Fraud in a Financial Statement Audit**

4. The amendment to AU-C section 240 is effective for audits of financial statements for periods ending on or after December 15, 2023.

[No amendment to paragraphs .01–.06.]

**Responsibility for the Prevention and Detection of Fraud**

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***Responsibilities of the Auditor***

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**.07** Furthermore, the risk of the auditor not detecting a material misstatement resulting from management fraud is greater than for employee fraud because management is frequently in a position to directly or indirectly manipulate accounting records, present fraudulent financial information, or override controls ~~procedures~~ designed to prevent similar frauds by other employees.

[No amendment to paragraphs .08–.15.]

### **Risk Assessment Procedures and Related Activities**

**.16** When performing risk assessment procedures and related activities to obtain an understanding of the entity and its environment, ***the applicable financial reporting framework and including the entity's system of internal control***, required by ***SAS No. 145***~~section 315~~, the auditor should perform the procedures in paragraphs .17–.24 to obtain information for use in identifying the risks of material misstatement due to fraud.  
<sup>fn 5</sup>

<sup>fn 5</sup> [Footnote omitted for purposes of this SAS.]

[No amendment to paragraphs .17–.19.]

### ***Those Charged With Governance***

**.20** Unless all of those charged with governance are involved in managing the entity, <sup>fn 7</sup> the auditor should obtain an understanding of how those charged with governance exercise oversight of management's processes for identifying and responding to the risks of fraud in the entity and the ~~internal~~ controls that management has established to mitigate these risks. (Ref: par. .A21–.A23)

<sup>fn 7</sup> [Footnote omitted for purposes of this SAS.]

[No amendment to paragraphs .21–.26.]

### **Identification and Assessment of the Risks of Material Misstatement Due to Fraud**

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**.27** The auditor should treat those assessed risks of material misstatement due to fraud as significant risks and, accordingly, to the extent not already done so, the auditor should ~~obtain an understanding of the entity's related~~ ***identify the entity's*** controls, ~~including control activities, relevant to~~ ***that address*** such risks ***and evaluate their design and determine whether they have been implemented.*** <sup>fn 10</sup> ~~including the evaluation of whether such controls have been suitably designed and implemented to mitigate such fraud risks.~~

<sup>fn 10</sup> ***Paragraphs 26a(i) and (d) of SAS No. 145, Understanding the Entity and Its Environment and Assessing the Risks of Material Misstatement.***

[Subsequent footnotes renumbered. No amendment to paragraphs .28–.31.]

### **Responses to the Assessed Risks of Material Misstatement Due to Fraud**

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### ***Audit Procedures Responsive to Risks Related to Management Override of Controls***

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**.32** Even if specific risks of material misstatement due to fraud are not identified by the auditor, a possibility exists that management override of controls could occur. Accordingly, the auditor should address the risk of management override of controls apart from any conclusions regarding the existence of more specifically identifiable risks by designing and performing audit procedures to

- a. test the appropriateness of journal entries recorded in the general ledger and other adjustments made in the preparation of the financial statements, including entries posted directly to financial statement drafts. In designing and performing audit procedures for such tests, the auditor should (Ref: par. .A47–.A50 and .A56)
  - i. obtain an understanding of the entity's financial reporting process and controls over journal entries and other adjustments, <sup>fn-12</sup> and, **in accordance with SAS No. 145, evaluate the suitability of design and determine whether the controls have been implemented** ~~implementation of such controls;~~ <sup>fn 13</sup>
  - ii. make inquiries of individuals involved in the financial reporting process about inappropriate or unusual activity relating to the processing of journal entries and other adjustments;
  - iii. consider fraud risk indicators, the nature and complexity of accounts, and unusual entries processed;
  - iv. select journal entries and other adjustments made at the end of a reporting period; and
  - v. consider the need to test journal entries and other adjustments throughout the period.
- b. review accounting estimates for biases and evaluate whether the circumstances producing the bias, if any, represent a risk of material misstatement due to fraud. In performing this review, the auditor should
  - i. evaluate whether the judgments and decisions made by management in making the accounting estimates included in the financial statements, even if they are individually reasonable, indicate a possible bias on the part of the entity's management that may represent a risk of material misstatement due to fraud. If so, the auditor should reevaluate the accounting estimates taken as a whole, and
  - ii. perform a retrospective review of management judgments and assumptions related to significant accounting estimates reflected in the financial statements of the prior year. Estimates selected for review should include those that are based on highly sensitive assumptions or are otherwise significantly affected by judgments made by management. (Ref: par. .A51–.A53)
- c. evaluate, given the auditor's understanding of the entity and its environment and other information obtained during the audit, whether the business purpose (or the lack thereof) of significant unusual transactions suggests that they may have been entered into to engage in fraudulent financial reporting or to conceal

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misappropriation of assets. The procedures should include the following: (Ref: par. .A54-.A55)

- i. Reading the underlying documentation and evaluating whether the terms and other information about the transaction are consistent with explanations from inquiries and other audit evidence about the business purpose (or the lack thereof) of the transaction
- ii. Determining whether the transaction has been authorized and approved in accordance with the entity's established policies and procedures
- iii. Evaluating whether significant unusual transactions that the auditor has identified have been properly accounted for and disclosed in the financial statements

<sup>fn 12 13</sup> Paragraph ~~.19~~ **26a and c** of *SAS No. 145*~~section 315~~.

[No amendment to paragraphs .33-.42.]

#### Documentation

**.43** The auditor should include in the audit documentation <sup>fn 13 14</sup> ~~of the auditor's understanding of the entity and its environment~~ **the identification** and the assessment of the risks of material misstatement required by *SAS No. 145*~~AU-C section 315~~, **which includes** the following: <sup>fn 14-15</sup>

- a. The significant decisions reached during the discussion among the engagement team regarding the susceptibility of the entity's financial statements to material misstatement due to fraud, and how and when the discussion occurred and the audit team members who participated
- b. The identified and assessed risks of material misstatement due to fraud at the financial statement level and at the assertion level (See paragraphs .16-.27.)
- c. ***Identified controls in the control activities component that address assessed risks of material misstatement due to fraud.***

<sup>fn 13-14-14 15</sup> [Footnotes omitted for purposes of this SAS.]

[No amendment to paragraphs .44-.A8.]

#### Professional Skepticism

**.A9** Maintaining professional skepticism requires an ongoing questioning of whether the information and audit evidence obtained suggests that a material misstatement due to fraud may exist. It includes considering the reliability of the information to be used as audit evidence and ~~the identified~~ **controls in the control activities, if any**, over its preparation and maintenance ~~when relevant~~. Due to the characteristics of fraud, the

auditor's professional skepticism is particularly important when considering the risks of material misstatement due to fraud.

[No amendment to paragraphs .A10–.A20.]

#### **Risk Assessment Procedures and Related Activities**

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#### ***Obtaining an Understanding of Oversight Exercised by Those Charged With Governance***

**.A21** Those charged with governance of an entity oversee the entity's systems for monitoring risk, financial control, and compliance with the law. In some circumstances, governance practices are well-developed, and those charged with governance play an active role in oversight of the entity's assessment of the risks of fraud and ~~of the relevant internal control~~ ***the controls that address such risks***. Because the responsibilities of those charged with governance and management may vary by entity, it is important that the auditor understands the respective responsibilities of those charged with governance and management to enable the auditor to obtain an understanding of the oversight exercised by the appropriate individuals.<sup>fn #8 19</sup>

<sup>fn #8 19</sup> [Footnote omitted for purposes of this SAS.]

**.A22** An understanding of the oversight exercised by those charged with governance may provide insights regarding the susceptibility of the entity to management fraud, the adequacy of ~~internal controls~~ ***that address*** ~~over~~ risks of fraud, and the competency and integrity of management. The auditor may obtain this understanding in a number of ways, such as by attending meetings during which such discussions take place, reading the minutes from such meetings, or making inquiries of those charged with governance.

[No amendment to paragraphs .A23–.A26.]

#### ***Other Information***

**.A27** In addition to information obtained from applying analytical procedures, other information obtained about the entity and its environment, ***the applicable financial reporting framework, and the entity's system of internal control*** may be helpful in identifying the risks of material misstatement due to fraud. The discussion among team members may provide information that is helpful in identifying such risks. In addition, information obtained from the auditor's client acceptance and retention processes, and experience gained on other engagements performed for the entity, for example, engagements to review interim financial information, may be relevant in the identification of the risks of material misstatement due to fraud.

[No amendment to paragraphs .A28–.A29.]

***Evaluation of Fraud Risk Factors***

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**.A30** Examples of fraud risk factors related to fraudulent financial reporting and misappropriation of assets are presented in appendix A, "Examples of Fraud Risk Factors." These illustrative risk factors are classified based on the three conditions that are generally present when fraud exists:

- An incentive or pressure to commit fraud
- A perceived opportunity to commit fraud
- An ability to rationalize the fraudulent action

The inability to observe one or more of these conditions does not necessarily mean that no risk of material misstatement due to fraud exists.

***Fraud risk factors may relate to incentives, pressures, or opportunities ~~may~~ that arise from conditions that create susceptibility to misstatement before consideration of controls. Fraud risk factors, which include intentional management bias, are inherent risk factors insofar as they affect inherent risk. Fraud risk factors may also relate to conditions within the entity's system of internal control that provide opportunity to commit fraud or that may affect management's attitude or ability to rationalize fraudulent actions. Fraud*** Risk factors reflective of an attitude that permits rationalization of the fraudulent action may not be susceptible to observation by the auditor. Nevertheless, the auditor may become aware of the existence of such information ***through, for example, the required understanding of the entity's control environment.*** <sup>fn 20</sup> Although the fraud risk factors described in appendix A cover a broad range of situations that may be faced by auditors, they are only examples, and other risk factors may exist.

<sup>fn 20</sup> Paragraph ~~28-21~~ of SAS No. 145, Understanding the Entity and Its Environment and Assessing the Risks of Material Misstatement.

[Subsequent footnotes renumbered. No amendment to paragraphs .A31–.A36.]

**Identification and Assessment of the Risks of Material Misstatement Due to Fraud**

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***Identifying and Assessing the Risks of Material Misstatement Due to Fraud and Understanding the Entity's Related Controls***

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**.A37** It is, therefore, important for the auditor to obtain an understanding of the controls that management has designed, implemented, and maintained to prevent and detect fraud.

~~In doing so,~~ ***In identifying the controls that address the risks of material misstatement due to fraud***, the auditor may learn, for example, that management has consciously chosen to accept the risks associated with a lack of segregation of duties. Information from ~~obtaining this understanding~~ ***identifying these controls and evaluating their design and determining whether they have been implemented*** may also be useful in identifying fraud risks factors that may affect the auditor's assessment of the risks that the financial statements may contain material misstatement due to fraud.

[No amendment to paragraphs .A38–.A47.]

### **Responses to the Assessed Risks of Material Misstatement Due to Fraud**

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#### ***Audit Procedures Responsive to Risks Related to Management Override of Controls***

##### *Journal Entries and Other Adjustments*

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**.A48** The auditor's consideration of the risks of material misstatement associated with inappropriate override of controls over journal entries <sup>fn 22</sup> is important because automated processes and controls may reduce the risk of inadvertent error but do not overcome the risk that individuals may inappropriately override such automated processes, for example, by changing the amounts being automatically passed to the general ledger or to the financial reporting system. Furthermore, when IT is used to transfer information automatically, there may be little or no visible evidence of such intervention in the information systems.

<sup>fn 22</sup> **Paragraph -Error! Reference source not found.b of SAS No. 145, Understanding the Entity and Its Environment and Assessing the Risks of Material Misstatement.**

[Subsequent footnotes further renumbered.]

**.A49** When identifying and selecting journal entries and other adjustments for testing and determining the appropriate method of examining the underlying support for the items selected, the following matters may be relevant:

- ***The identification and assessment of the risks of material misstatement due to fraud.*** The presence of fraud risk factors and other information obtained during the auditor's ***identification and*** assessment of the risks of material misstatement due to fraud may assist the auditor to identify specific classes of journal entries and other adjustments for testing.
- ***Controls that have been implemented over journal entries and other adjustments.*** Effective controls over the preparation and posting of journal entries and other adjustments may reduce the extent of substantive testing

necessary, provided that the auditor has tested the operating effectiveness of the controls.

- *The entity's financial reporting process and the nature of evidence that can be obtained.* For many entities, routine processing of transactions involves a combination of manual and automated ~~steps and~~ procedures **and controls**. Similarly, the processing of journal entries and other adjustments may involve both manual and automated procedures and controls. When IT is used in the financial reporting process, journal entries and other adjustments may exist only in electronic form.
- *The characteristics of fraudulent journal entries or other adjustments.* Inappropriate journal entries or other adjustments often have unique identifying characteristics. Such characteristics may include entries (a) made to unrelated, unusual, or seldom-used accounts; (b) made by individuals who typically do not make journal entries; (c) recorded at the end of the period or as post-closing entries that have little or no explanation or description; (d) made either before or during the preparation of the financial statements that do not have account numbers; or (e) containing round numbers or consistent ending numbers.
- *The nature and complexity of the accounts.* Inappropriate journal entries or adjustments may be applied to accounts that (a) contain transactions that are complex or unusual in nature, (b) contain significant estimates and period-end adjustments, (c) have been prone to misstatements in the past, (d) have not been reconciled on a timely basis or contain unreconciled differences, (e) contain intercompany transactions, or (f) are otherwise associated with an identified risk of material misstatement due to fraud. In audits of entities that have several locations or components, consideration is given to the need to select journal entries from multiple locations.
- *Journal entries or other adjustments processed outside the normal course of business.* Nonstandard journal entries, and other entries such as consolidating adjustments, may not be subject to the same ~~level of internal~~ **nature and extent of** controls as those journal entries used on a recurring basis to record transactions such as monthly sales, purchases, and cash disbursements.

[No amendment to paragraphs .A50–.A75.]

## Appendix A — Examples of Fraud Risk Factors

### .A76

The fraud risk factors identified in this appendix are examples of such factors that may be faced by auditors in a broad range of situations. Separately presented are examples relating to the two types of fraud relevant to the auditor's consideration — that is, fraudulent financial reporting and misappropriation of assets. For each of these



types of fraud, the risk factors are further classified based on the three conditions generally present when material misstatements due to fraud occur: (a) incentives and pressures, (b) opportunities, and (c) attitudes and rationalizations. Although the risk factors cover a broad range of situations, they are only examples and, accordingly, the auditor may identify additional or different risk factors. Not all of these examples are relevant in all circumstances, and some may be of greater or lesser significance in entities of different size or with different ownership characteristics or circumstances. Also, the order of the examples of risk factors provided is not intended to reflect their relative importance or frequency of occurrence.

*Fraud risk factors may relate to incentives or pressures, or opportunities that arise from conditions that create susceptibility to misstatement before consideration of controls (that is, the determination is based on inherent risk). Such factors are inherent risk factors and may be due to susceptibility to management bias. Fraud risk factors related to opportunities may also arise from other identified inherent risk factors (for example, complexity or uncertainty may create opportunities that result in susceptibility to misstatement due to fraud). Fraud risk factors related to opportunities may also relate to conditions within the entity's system of internal control, such as limitations or deficiencies in internal control that create such opportunities. Fraud risk factors related to attitudes or rationalizations may arise, in particular, from limitations or control deficiencies in the entity's control environment.*

#### **Risk Factors Relating to Misstatements Arising From Fraudulent Financial Reporting**

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##### ***Opportunities***

...

~~Internal control components are deficient~~ **Deficiencies in internal control areas** as a result of the following:

- Inadequate ~~monitoring of controls~~ **process to monitor the entity's system of internal control**, including automated controls and controls over interim financial reporting (when external reporting is required)
- High turnover rates or employment of staff in accounting, IT, or the internal audit function who are not effective
- Accounting and information systems that are not effective, including situations involving significant deficiencies or material weaknesses in internal control
- Weak controls over budget preparation and development and compliance with law or regulation

...

**Risk Factors Arising From Misstatements Arising From Misappropriation of Assets**

...

***Opportunities***

Certain characteristics or circumstances may increase the susceptibility of assets to misappropriation. For example, opportunities to misappropriate assets increase when the following exist:

- Large amounts of cash on hand or processed
- Inventory items that are small in size, of high value, or in high demand
- Easily convertible assets, such as bearer bonds, diamonds, or computer chips
- Fixed assets that are small in size, marketable, or lack observable identification of ownership

Inadequate ~~internal~~ controls over assets may increase the susceptibility of misappropriation of those assets. For example, misappropriation of assets may occur because the following exist:

- Inadequate segregation of duties or independent checks
- Inadequate oversight of senior management expenditures, such as travel and other reimbursements
- Inadequate management oversight of employees responsible for assets (for example, inadequate supervision or monitoring of remote locations)
- Inadequate job applicant screening of employees with access to assets
- Inadequate record keeping with respect to assets
- Inadequate system of authorization and approval of transactions (for example, in purchasing)
- Inadequate physical safeguards over cash, investments, inventory, or fixed assets
- Lack of complete and timely reconciliations of assets
- Lack of timely and appropriate documentation of transactions (for example, credits for merchandise returns)

Appendix G, Amendments to Various SASs  
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- Lack of mandatory vacations for employees performing key control functions
- Inadequate management understanding of IT, which enables IT employees to perpetrate a misappropriation
- Inadequate access controls over automated records, including controls over and review of computer systems event logs

***Attitudes and Rationalizations***

- Disregard for the need for monitoring or reducing risks related to misappropriations of assets
- Disregard for ~~internal~~ controls over misappropriation of assets by overriding existing controls or by failing to take appropriate remedial action on known deficiencies in internal control
- Behavior indicating displeasure or dissatisfaction with the entity or its treatment of the employee
- Changes in behavior or lifestyle that may indicate assets have been misappropriated
- The belief by some government or other officials that their level of authority justifies a certain level of compensation and personal privileges
- Tolerance of petty theft

**Appendix B — Examples of Possible Audit Procedures to Address the Assessed Risks of Material Misstatement Due to Fraud**

**.A77**

The following are examples of possible audit procedures to address the assessed risks of material misstatement due to fraud resulting from both fraudulent financial reporting and misappropriation of assets. Although these procedures cover a broad range of situations, they are only examples and, accordingly, they may not be the most appropriate nor necessary in each circumstance. Also the order of the procedures provided is not intended to reflect their relative importance.

**Consideration at the Assertion Level**

...

- If the work of an expert ~~a specialist~~ becomes particularly significant with respect to a financial statement item for which the assessed risk of *material* misstatement due to fraud is high, performing additional procedures relating to some or all of the expert's assumptions, methods, or findings to determine that the findings are not unreasonable, or engaging another expert for that purpose

**Commented [AM8]:** From Linda -  
Not an amendment – revised to reflect GAAS wording and correct ED

...

[No further amendment to appendix B. No further amendment to AU-C section 240.]

#### ***AU-C Section 250, Consideration of Laws and Regulations in an Audit of Financial Statements***

5. The amendment to AU-C section 250 is effective for audits of financial statements for periods ending on or after December 15, 2023.

[No amendment to paragraphs .01–.A23.]

#### **Audit Procedures When Noncompliance Is Identified or Suspected**

...

#### ***Evaluating the Implications of Noncompliance***

**.A24** As required by paragraph .20, the auditor evaluates the implications of noncompliance with regard to other aspects of the audit, including the auditor's risk assessment and the reliability of written representations. The implications of particular instances of noncompliance identified by the auditor will depend on the relationship of the perpetration and concealment, if any, of the act to specific controls activities and the level of management or employees involved, especially implications arising from the involvement of the highest authority within the entity.

[No further amendment to AU-C section 250.]

#### ***AU-C Section 260, The Auditor's Communication With Those Charged With Governance***

6. The amendment to AU-C section 260 is effective for audits of financial statements for periods ending on or after December 15, 2023.

[No amendment to paragraphs .01–.A19.]

### **Matters to Be Communicated**

...

### ***Planned Scope and Timing of the Audit***

...

**.A20** Communicating significant risks identified by the auditor helps those charged with governance understand those matters and why they ***were determined to be significant risks*** ~~require special audit consideration~~. The communication about significant risks may assist those charged with governance in fulfilling their responsibility to oversee the financial reporting process.

**.A21** Other matters regarding the planned scope and timing of the audit may include the following:

- How the auditor plans to address the significant risks of material misstatement, whether due to fraud or error.
- How the auditor plans to address areas of higher assessed risks of material misstatement.
- The auditor's approach to ***the system of*** internal control, ~~relevant to the audit~~ including, when applicable, whether the auditor will express an opinion on the effectiveness of internal control over financial reporting.

...

[No further amendment to AU-C section 260.]

### **AU-C Section 265, *Communicating Internal Control Related Matters Identified in an Audit***

7. The amendment to AU-C section 265 is effective for audits of financial statements for periods ending on or after December 15, 2023.

### **Introduction**

#### **Scope of This Section**

.01 This section addresses the auditor's responsibility to appropriately communicate to those charged with governance and management deficiencies in internal control that the auditor has identified in an audit of financial statements. This section does not impose additional responsibilities on the auditor regarding obtaining an understanding of internal control or designing and performing tests of controls over and above the requirements of *SAS No. 145* section 315, *Understanding the Entity and Its Environment and Assessing the Risks of Material Misstatement*, and section 330, *Performing Audit Procedures in Response to Assessed Risks and Evaluating the Audit Evidence Obtained*. *Section 260, The Auditor's Communication With Those Charged With Governance*, establishes further requirements and provides guidance regarding the auditor's responsibility to communicate with those charged with governance regarding the audit.

.02 The auditor is required to obtain an understanding of *the entity's system of* internal control ~~relevant to the audit~~ when identifying and assessing the risks of material misstatement. <sup>fn 1</sup> In making those risk assessments, the auditor considers *the entity's system of* internal control in order to design audit procedures that are appropriate in the circumstances but not for the purpose of expressing an opinion on the effectiveness of internal control. The auditor may identify deficiencies in internal control (*commonly referred to as control deficiencies*) ~~not only~~ during this risk assessment process but also at any other stage of the audit. This section specifies which identified deficiencies the auditor is required to communicate to those charged with governance and management.

<sup>fn 1</sup> [Footnote omitted for purposes of this SAS.]

[No amendment to paragraphs .03–.06.]

#### Definitions

.07 For purposes of generally accepted auditing standards, the following terms have the meanings attributed as follows:

**Deficiency in internal control.** A deficiency in internal control over financial reporting exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis. A deficiency in design exists when (a) a control necessary to meet the 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. (*Ref: par. A1*)

...

[No further amendment to paragraph .07. No amendment to paragraphs .08–.16.]

Commented [AM9]: From Linda - Amendment - Revised to be bold italics

### Determination of Whether Deficiencies in Internal Control Have Been Identified

*.A1 ~~The proposed SAS No. 145~~, Understanding the Entity and Its Environment and Assessing the Risks of Material Misstatement, defines the term system of internal control and recognizes that internal control frameworks may use different terms that are similar to the concept of the system of internal control. This section defines the term deficiency in internal control in the context of a system of internal control over financial reporting to more clearly define the auditor's communication responsibilities in this section.*

[Paragraphs .A1–.A39 are renumbered as paragraphs .A2–.A40. No amendment to renumbered paragraphs .A2–.A3.]

### Considerations Specific to Smaller, Less Complex Entities

~~.A344~~ Although the concepts underlying *controls in the* control activities *component* in smaller entities are likely to be similar to those in larger entities, the formality with which controls operate will vary. Further, smaller entities may find that certain types of controls ~~activities~~ are not necessary because of controls applied by management. For example, management's sole authority for granting credit to customers and approving significant purchases can provide effective control over important account balances and transactions, lessening or removing the need for more detailed controls ~~activities~~.

[No amendment to renumbered paragraphs .A5–.A10.]

### Evaluating Identified Deficiencies in Internal Control

...

~~.A10A11~~ Controls may be designed to operate individually, or in combination, to effectively prevent, or detect and correct, misstatements.<sup>fn 3</sup> For example, controls over accounts receivable may consist of both automated and manual controls designed to operate together to prevent, or detect and correct, misstatements in the account balance. A deficiency in internal control on its own may not be sufficiently important to constitute a significant deficiency or a material weakness. However, a combination of deficiencies affecting the same class of transactions, account balance, or disclosure, ~~relevant~~ assertion, or component of *the entity's system of* internal control may increase the risks of misstatement to such an extent to give rise to a significant deficiency or material weakness.

<sup>fn 3</sup> [Footnote omitted for purposes of this SAS.]

[No further amendment to AU-C section 265.]

**AU-C Section 300, *Planning an Audit***

8. The amendment to AU-C section 300 is effective for audits of financial statements for periods ending on or after December 15, 2023.

[No amendment to paragraphs .01–.A25.]

**Documentation**

***Considerations Specific to Smaller, Less Complex Entities***

**.A26** As discussed in paragraph .A12, a suitable, brief memorandum may serve as the documented strategy for the audit of a smaller entity. For the audit plan, standard audit programs or checklists (see paragraph .A24) drawn up on the assumption of few ~~relevant~~ controls activities, which is likely to be the case in a smaller entity, may be used, provided that they are tailored to the circumstances of the engagement, including the auditor’s risk assessments.

[No further amendment to AU-C section 300.]

**AU-C Section 330, *Performing Audit Procedures in Response to Assessed Risks and Evaluating the Audit Evidence Obtained***

9. The amendment to AU-C section 330 is effective for audits of financial statements for periods ending on or after December 15, 2023.

[No amendment to paragraphs .01–.06.]

**Audit Procedures Responsive to the Assessed Risks of Material Misstatement at the Relevant Assertion Level**

...

**.07** In designing the further audit procedures to be performed, the auditor should

- a. consider the reasons for the assessed risk of material misstatement at the relevant assertion level for each **significant** class of transactions, account balance, and disclosure, including
  - i. the likelihood **and magnitude** of ~~material~~ misstatement due to the particular characteristics of the ~~relevant~~ **significant** class of transactions, account balance, or disclosure (the inherent risk) and

**Commented [MM10]:** Edit not conforming amendment – “relevant” is already included in AU-C section 330



- ii. whether the risk assessment takes account of ~~relevant~~ controls **that address the risk of material misstatement** (the control risk), thereby requiring the auditor to obtain audit evidence to determine whether the controls are operating effectively (that is, the auditor ~~intends to rely on~~ **plans to test** on the operating effectiveness of controls in determining the nature, timing, and extent of substantive procedures), and (Ref: par. .A10–.A19)
- b. obtain more persuasive audit evidence the higher the auditor’s assessment of risk. (Ref: par. .A20)

#### ***Tests of Controls***

**.08** The auditor should design and perform tests of controls to obtain sufficient appropriate audit evidence about the operating effectiveness of ~~relevant~~ controls if

- a. the auditor’s assessment of risks of material misstatement at the relevant assertion level includes an expectation that the controls are operating effectively (that is, the auditor ~~intends to rely on~~ **plans to test** the operating effectiveness of controls in determining the nature, timing, and extent of substantive procedures) or
- b. substantive procedures alone cannot provide sufficient appropriate audit evidence at the relevant assertion level. (Ref: par. .A21–.A26)

[No amendment to paragraph .09.]

#### ***Nature and Extent of Tests of Controls***

**.10** In designing and performing tests of controls, the auditor should

- a. perform other audit procedures in combination with inquiry to obtain audit evidence about the operating effectiveness of the controls, including
  - i. how the controls were applied at relevant times during the period under audit;
  - ii. the consistency with which they were applied; and
  - iii. by whom or by what means they were applied, including, when applicable, whether the person performing the control possesses the necessary authority and competence to perform the control effectively, and (Ref: par. .A28–.A32)
- b. **to the extent not already addressed**, determine whether the controls to be tested depend upon other controls (indirect controls) and, if so, whether it is necessary to obtain audit evidence supporting the operating effectiveness of those indirect controls. (Ref: par. .A33–.A34)

[No amendment to paragraphs .11–12.]

#### ***Timing of Tests of Controls***

...

*Using Audit Evidence Obtained in Previous Audits*

**.13** In determining whether it is appropriate to use audit evidence about the operating effectiveness of controls obtained in previous audits and, if so, the length of the time period that may elapse before retesting a control, the auditor should consider

- a. the effectiveness of other ~~elements~~ **components of the entity's system of** internal control, including the control environment, the entity's **process to** monitoring of ~~the system of internal~~ controls, and the entity's risk assessment process;
- b. the risks arising from the characteristics of the control, including whether the control is manual or automated;
- c. the effectiveness of general IT controls;
- d. the effectiveness of the control and its application by the entity, including the nature and extent of deviations in the application of the control noted in previous audits and whether there have been personnel changes that significantly affect the application of the control;
- e. whether the lack of a change in a particular control poses a risk due to changing circumstances; and
- f. the risks of material misstatement and the extent of reliance on the control. (Ref: par. .A38)

[No amendment to paragraph .14.]

*Controls Over Significant Risks*

**.15** If the auditor ~~plans~~ **intends** to rely on controls over a risk the auditor has determined to be a significant risk,<sup>fn 1</sup> the auditor should test the operating effectiveness of those controls in the current period.

<sup>fn 1</sup> [Footnote omitted for purposes of this SAS.]

*Evaluating the Operating Effectiveness of Controls*

**.16** When evaluating the operating effectiveness of ~~relevant~~ controls **upon which the auditor intends to rely**, the auditor should evaluate whether misstatements that have been detected by substantive procedures indicate that controls are not operating effectively. The absence of misstatements detected by substantive procedures, however, does not provide audit evidence that controls related to the relevant assertion being tested are effective. (Ref: par. .A43)

.17 If deviations from controls upon which the auditor intends to rely are detected, the auditor should make specific inquiries to understand these matters and their potential consequences and should determine whether

- a. the tests of controls that have been performed provide an appropriate basis for reliance on the controls,
- b. additional tests of controls are necessary, or
- c. the ~~potential~~ risks of **material** misstatement need to be addressed using substantive procedures. (Ref: par. .A44)

#### ***Substantive Procedures***

.18 ~~Irrespective of the assessed risks of material misstatement, The auditor should design and perform substantive procedures for each all relevant assertions related of to each material~~ ***significant*** class of transactions, account balance, and disclosure, ***regardless of the assessed level of control risk.*** (Ref: par. .A45–.A50)

**Commented [AM11]:** From Linda - Amendment - Make "significant" bold italics

[No amendment to paragraphs .19–.28.]

#### **Evaluating the Sufficiency and Appropriateness of Audit Evidence**<sup>fn 3</sup>

...

.29 If the auditor has not obtained sufficient appropriate audit evidence ~~about~~ ***related to a relevant assertion about a significant class of transactions, account balance, or disclosure,*** the auditor should attempt to obtain further audit evidence. If the auditor is unable to obtain sufficient appropriate audit evidence, the auditor should express a qualified opinion or disclaim an opinion on the financial statements.<sup>fn 4</sup>

<sup>fns 3–4</sup> [Footnotes omitted for purposes of this SAS.]

[No amendment to paragraphs .30–.33.]

#### **Overall Responses**

.A1 Overall responses to address the assessed risks of material misstatement at the financial statement level may include<sup>fn 6</sup>

- emphasizing to the audit team the need to maintain professional skepticism.
- assigning more experienced staff or those with specialized skills or using specialists.
- ~~providing more supervision~~ ***changes to the nature, timing, and extent of direction and supervision of members of the engagement team and the review of the work performed.***

- incorporating additional elements of unpredictability in the selection of further audit procedures to be performed.
- **changes to the overall audit strategy as required by section 300, Planning an Audit, or planned audit procedures, and may include changes to the following:**
  - *The auditor’s determination of performance materiality in accordance with section 320.*
  - *The auditor’s plans to test the operating effectiveness of controls, and the persuasiveness of audit evidence needed to support the planned reliance on the operating effectiveness of the controls, particularly when control deficiencies in the control environment or the entity’s monitoring activities are identified.*
  - *The nature, timing, and extent of substantive procedures. For example, it may be appropriate to perform substantive procedures at or near the date of the financial statements when the risk of material misstatement is assessed as higher.*
- ~~making general changes to the nature, timing, or extent of audit procedures (for example, performing substantive procedures at period end instead of at an interim date or modifying the nature of audit procedures to obtain more persuasive audit evidence).~~

<sup>in 6</sup> [Footnote omitted for purposes of this SAS.]

[No amendment to paragraphs .A2–.A3.]

#### **Audit Procedures Responsive to the Assessed Risks of Material Misstatement at the Relevant Assertion Level**

##### ***The Nature, Timing, and Extent of Further Audit Procedures***

**.A4** The auditor’s assessment of the identified risks **of material misstatement** at the relevant assertion level provides a basis for considering the appropriate audit approach for designing and performing further audit procedures. For example, the auditor may determine that

- a. in addition to the substantive procedures that are required for all relevant assertions, in accordance with paragraph .18, an effective response to the assessed risk of material misstatement for a particular assertion can be achieved only by also performing tests of controls.
- b. performing only substantive procedures is appropriate for particular assertions, and therefore, the auditor excludes the effect of controls from the ~~relevant risk~~ assessment **of the risk of material misstatement**. This may be because the ~~auditor’s risk assessment procedures have not identified any effective controls relevant to the assertion or because~~ **auditor has not identified a risk for which substantive procedures alone cannot provide sufficient appropriate audit evidence**

**Commented [MM12]:** Edit no conforming amendment – “relevant” already included in AU-C section 330

**and, as a result, is not required to test the operating effectiveness of controls.**  
~~testing controls would be inefficient, and therefore, the auditor does not intend to rely on~~ **may not plan to test** the operating effectiveness of controls in determining the nature, timing, and extent of substantive procedures.

- c. a combined approach using both tests of controls and substantive procedures is an effective approach.

[No amendment to paragraphs .A5–.A6.]

**.A7** Extent of an audit procedure refers to the quantity to be performed (for example, a sample size or the number of observations of a control activity).

[No amendment to paragraphs .A8–.A9.]

*Responding to the Assessed Risks at the Assertion Level*

**.A10** Nature. ~~AU-C section 315~~ **SAS No. 145** requires that the auditor's assessment of the risks of material misstatement at the assertion level is performed by assessing inherent risk and control risk. The auditor assesses inherent risk by assessing the likelihood and magnitude of a ~~material~~ misstatement, taking into account how and the degree to which the inherent risk factors affect the susceptibility ~~to misstatement of relevant assertions~~ **to misstatement**. ~~identified events or conditions relating to significant classes of transactions, account balances or disclosures are subject to, or affected by, the inherent risk factors.~~<sup>fn 9</sup> The auditor's assessed risks, including the reasons for those assessed risks, may affect both the types of audit procedures to be performed and their combination. For example, when an assessed risk is high, the auditor may confirm the completeness of the terms of a contract with the counterparty, in addition to inspecting the document. Further, certain audit procedures may be more appropriate for some assertions than others. For example, regarding revenue, tests of controls may be most responsive to the assessed risk of **material** misstatement of the completeness assertion, whereas substantive procedures may be most responsive to the assessed risk of **material** misstatement of the occurrence assertion.

<sup>fn 9</sup> Paragraph 48 of SAS No. 145.

[Subsequent footnotes renumbered.]

**.A11** The reasons for the assessment given to a risk are relevant in determining the nature of audit procedures. For example, if an assessed risk is lower because of the particular characteristics of a class of transactions without consideration of the related controls, then the auditor may determine that substantive analytical procedures alone provide sufficient appropriate audit evidence. On the other hand, if the assessed risk is lower because of internal control, **the auditor plans to test the operating effectiveness of controls that are appropriately designed and implemented** and the auditor intends to base the substantive procedures on that low assessment, then the auditor performs tests of those controls, as required by paragraph .08a. This may be the case, for example, for a

class of transactions of reasonably uniform, noncomplex characteristics that are routinely processed and controlled by the entity's information system.

[No amendment to paragraphs .A12–.A18.]

**.A19** *Considerations specific to smaller, less complex entities.* In the case of smaller entities, the auditor may not identify controls ~~activities~~, or the extent to which their existence or operation have been documented by the entity may be limited. In such cases, it may be more efficient for the auditor to perform further audit procedures that are primarily substantive procedures. In some rare cases, however, the absence of controls ~~activities~~ or ~~other~~ components of *the system of internal* control may make it impossible to obtain sufficient appropriate audit evidence.

[No amendment to paragraph .A20.]

### ***Tests of Controls***

#### *Designing and Performing Tests of Controls*

**.A21** Tests of controls are performed only on those controls that the auditor *plans to test and* has determined are suitably designed to prevent, or detect and correct, a material misstatement in a relevant assertion. If substantially different controls were used at different times during the period under audit, each is considered separately.

[No amendment to paragraphs .A22–.A24.]

**.A25** In some cases, the auditor may find it impossible to design effective substantive procedures that, by themselves, provide sufficient appropriate audit evidence at the relevant assertion level. <sup>fn 9 10</sup> This may occur when an entity conducts its business using IT and no documentation of transactions is produced or maintained, other than through the IT system. In such cases, paragraph .08b requires the auditor to perform tests of ~~relevant~~ controls *that address the risk for which substantive procedures alone cannot provide sufficient appropriate audit evidence.*

<sup>fn 9 10</sup> [Footnote omitted for purposes of this SAS.]

[No amendment to paragraphs .A26–.A28.]

#### *Nature and Extent of Tests of Controls*

...

**.A29** The nature of the particular control influences the type of audit procedure necessary to obtain audit evidence about whether the control was operating effectively. For example, if operating effectiveness is evidenced by documentation, the auditor may decide to inspect such documentation to obtain audit evidence about operating effectiveness. For other controls, however, documentation may not be available or relevant. For example, documentation of operation may not exist for some factors in the

control environment, such as assignment of authority and responsibility, or for some types of controls activities, such as *automated* controls activities performed by a computer. In such circumstances, audit evidence about operating effectiveness may be obtained through inquiry in combination with other audit procedures, such as observation or the use of CAATs.

[No amendment to paragraphs .A30–.A31.]

**.A32** Because of the inherent consistency of IT processing, it may not be necessary to increase the extent of testing of an automated control. An automated control can be expected to function consistently unless the ~~program~~ *IT application* (including the tables, files, or other permanent data used by the ~~program~~ *IT application*) is changed. Once the auditor determines that an automated control is functioning as intended (which could be done at the time the control is initially implemented or at some other date), the auditor may consider performing tests to determine that the control continues to function effectively. Such tests ~~might~~ *may* include *testing the general IT controls related to the IT application*. ~~determining that~~

- ~~changes to the program are not made without being subject to the appropriate program change controls,~~
- ~~the authorized version of the program is used for processing transactions, and~~
- ~~other relevant general controls are effective.~~

Such tests also might include determining that changes to the programs have not been made, which may be the case when the entity uses packaged software applications without modifying or maintaining them. For example, the auditor may inspect the record of the administration of IT security to obtain audit evidence that unauthorized access has not occurred during the period.

**.A33** *Similarly, the auditor may perform tests of controls that address risks of material misstatement related to the integrity of the entity’s data, or the ~~completeness~~ ~~and~~ ~~accuracy~~ and completeness of the entity’s system-generated reports, or may determine they are necessary to address risks of material misstatement because substantive procedures alone cannot provide sufficient appropriate audit evidence. These tests of controls may include tests of general IT controls that address the matters in paragraph .10a. When this is the case, the auditor may not need to perform any further testing to obtain audit evidence about the matters in paragraph .10a.*

**.A34** *When the auditor determines that a general IT control is deficient, the auditor may consider the nature of the related risks arising from the use of IT that were identified in accordance with ~~the proposed~~ SAS No. 145<sup>in 12</sup> to provide the basis for the design of the auditor’s additional procedures to address the assessed risk of material misstatement. Such procedures may address determining the following:*

- *Whether the related risks arising from the use of IT have occurred. For example, if users have unauthorized access to an IT application (but cannot access or modify the system logs that track access), the auditor may decide to inspect the*

*system logs to obtain audit evidence that those users did not access the IT application during the period.*

- *Whether there are any alternate or redundant general IT controls, or any other controls, that address the related risks arising from the use of IT. If so, the auditor may identify such controls (if not already identified) and, therefore, evaluate their design, determine that they have been implemented, and perform tests of their operating effectiveness. For example, if a general IT control related to user access is deficient, the entity may have an alternate control whereby IT management reviews end-user access reports on a timely basis. Circumstances in which an application control may address a risk arising from the use of IT may include when the information that may be affected by the general IT control deficiency can be reconciled to external sources (for example, a bank statement) or internal sources not affected by the general IT control deficiency (for example, a separate IT application or data source).*

*fn 12 Paragraph 41 of SAS No. 145.*

[Subsequent footnotes further renumbered.]

~~**.A33.A35** *Testing of indirect controls (Ref: par. .10b).* In some circumstances, it may be necessary to obtain audit evidence supporting the effective operation of indirect controls (for example, general IT controls). As explained in paragraphs .A33–.A34, general IT controls may have been identified in accordance with SAS No. 145 because of their support of the operating effectiveness of automated controls or due to their support in maintaining the integrity of information used in the entity’s financial reporting, including system-generated reports. The requirement in paragraph .10b acknowledges that the auditor may have already tested certain indirect controls to address the matters in paragraph .10a. For example, when the auditor decides to test the effectiveness of a user review of exception reports detailing sales in excess of authorized credit limits, the user review and related follow up is the control that is of direct relevance to the auditor. Controls over the accuracy of the information in the reports (for example, the general IT controls) are described as indirect controls.~~

~~**.A34** *Because of the inherent consistency of IT processing, audit evidence about the implementation of an automated application control, when considered in combination with audit evidence about the operating effectiveness of the entity’s general IT controls (in particular, change controls), also may provide substantial audit evidence about its operating effectiveness.*~~

#### *Timing of Tests of Controls*

~~**.A35.A37** *Intended period of reliance (Ref: par. .11).* Audit evidence pertaining only to a point in time may be sufficient for the auditor’s purpose (for example, when testing controls over the entity’s physical inventory counting at the period-end). If, on the other hand, the auditor intends to rely on a control over a period, tests that are capable of providing audit evidence that the control operated effectively at relevant times during that~~



period are appropriate. Such tests may include tests of **controls in the entity's process to monitoring the system of internal** controls.

[Former paragraphs .A36–.A78 renumbered as paragraphs .A38–.A80. No amendment to renumbered paragraphs .A38–.A39.]

**.A38.A40** *Using audit evidence obtained in previous audits (Ref: par. .13).* In certain circumstances, audit evidence obtained from previous audits may provide audit evidence, provided that the auditor has determined whether changes have occurred since the previous audit that may affect its relevance to the current audit **and its reliability**. For example, in performing a previous audit, the auditor may have determined that an automated control was functioning as intended. The auditor may obtain audit evidence to determine whether changes to the automated control have been made that affect its continued effective functioning through, for example, inquiries of management and the inspection of logs to indicate what controls have been changed. Consideration of audit evidence about these changes may support either increasing or decreasing the expected audit evidence to be obtained in the current period about the operating effectiveness of the controls.

**.A39.A41** *Controls that have changed from previous audits (Ref: par. .14a).* Changes may affect the relevance **and reliability** of the audit evidence obtained in previous audits such that there may no longer be a basis for continued reliance. For example, changes in a system that enable an entity to receive a new report from the system probably do not affect the relevance of audit evidence from a previous audit; however, a change that causes data to be accumulated or calculated differently does affect it.

[No amendment to renumbered paragraph .A42.]

**.A41.A43** In general, the higher the risk of material misstatement or the greater the reliance on controls, the shorter the time period elapsed, if any, is likely to be. Factors that may decrease the period for retesting a control or result in not relying on audit evidence obtained in previous audits at all include the following:

- A deficient control environment
- A ~~control~~ **Deficient deficiency in the entity's process to monitoring the system of internal controls**
- A significant manual element to ~~the relevant~~ **the identified** controls
- Personnel changes that significantly affect the application of the control
- Changing circumstances that indicate the need for changes in the control
- Deficient general IT controls

[No amendment to renumbered paragraphs .A44–.A46.]

### **Substantive Procedures**

**.A45.A47** Paragraph .18 requires the auditor to design and perform substantive procedures for all relevant assertions related to each ~~material~~ **significant** class of

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**Commented [AM14]:** From Linda – Amendment - Added strikethrough of “s”

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transactions, account balance, and disclosure, ~~irrespective of the assessed risks of material misstatement.~~ ***For such classes of transactions, account balances, and disclosures, substantive procedures may have already been performed because paragraph .06 requires the auditor to design and perform further audit procedures that are responsive to the assessed risks of material misstatement at the relevant assertion level. Accordingly, substantive procedures are required to be designed and performed in accordance with paragraph .18 when the further audit procedures designed and performed in accordance with paragraph .06 for significant classes of transactions, account balances, or disclosures, designed and performed in accordance with paragraph .06, did not include substantive procedures.*** This requirement reflects the facts that (i) the auditor's assessment of risk is judgmental and may not identify all risks of material misstatement and (ii) inherent limitations to internal control exist, including management override.

Commented [MM16]: Added to align with AU-C section 330

[No amendment to renumbered paragraphs .A48-.A49.]

#### *Nature and Extent of Substantive Procedures*

...

~~.A48~~ ***.A450*** The ~~nature~~ ***assessment*** of the risk ~~and~~ ***or the nature of the*** assertion is relevant to the design of tests of details. For example, tests of details related to the existence or occurrence assertion may involve selecting from items contained in a financial statement amount and obtaining ~~the relevant~~ audit evidence. On the other hand, tests of details related to the completeness assertion may involve selecting from items that are expected to be included in the relevant financial statement amount and investigating whether they are included. For example, the auditor might inspect subsequent cash disbursements and compare them with the recorded accounts payable to determine whether any purchases had been omitted from accounts payable.

Commented [LCD17]: Removed by SAS 142 amendment - Not an amendment

~~.A49~~ ***.A51*** Because the assessment of the risks of material misstatement takes account of ~~internal~~ controls ***which the auditor plans to test***, the extent of substantive procedures may need to be increased when the results from tests of controls are unsatisfactory. However, increasing the extent of an audit procedure is appropriate only if the audit procedure itself is relevant to the specific risk.

[No amendment to renumbered paragraphs .A52-.A63.]

#### *Timing of Substantive Procedures*

...

~~.A62~~ ***.A64*** Performing substantive procedures at an interim date without undertaking additional procedures at a later date increases the risk that the auditor will not detect misstatements that may exist at the period-end. This risk increases as the remaining period is lengthened. Factors such as the following may influence whether to perform substantive procedures at an interim date:

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- The effectiveness of the control environment and other ~~relevant~~ controls
- The availability at a later date of information necessary for the auditor's procedures
- The purpose of the substantive procedure
- The assessed risk of material misstatement
- The nature of the class of transactions or account balance and relevant assertions
- The ability of the auditor to perform appropriate substantive procedures or substantive procedures combined with tests of controls to cover the remaining period in order to reduce the risk that misstatements that may exist at the period-end will not be detected

[No amendment to renumbered paragraph .A65.]

~~.A64~~**A66** Factors such as the following may influence whether to perform substantive analytical procedures with respect to the period between the interim date and the period-end:

- Whether the period-end balances of the particular classes of transactions or account balances are reasonably predictable with respect to amount, relative significance, and composition
- Whether the entity's procedures for analyzing and adjusting such classes of transactions or account balances at interim dates and establishing proper accounting cutoffs are appropriate
- Whether the information system ~~relevant to financial reporting~~ will provide information concerning the balances at the period-end and the transactions in the remaining period that is sufficient to permit investigation of the following:
  - Significant unusual transactions or entries (including those at or near the period-end)
  - Other causes of significant fluctuations or expected fluctuations that did not occur
  - Changes in the composition of the classes of transactions or account balances

[No amendment to renumbered paragraphs .A67–.A75.]

#### **Evaluating the Sufficiency and Appropriateness of Audit Evidence**

~~.A74~~**A76** An audit of financial statements is a cumulative and iterative process. As the auditor performs planned audit procedures, the audit evidence obtained may cause the auditor to modify the nature, timing, or extent of other planned audit procedures. Information may come to the auditor's attention that differs significantly from the information on which the risk assessments were based. For example

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- the extent of misstatements that the auditor detects by performing substantive procedures may alter the auditor's professional judgment about the risk assessments and indicate a significant deficiency or material weakness in internal control.
- the auditor may become aware of discrepancies in accounting records or conflicting or missing evidence.
- analytical procedures performed at the overall review stage of the audit may indicate a previously unrecognized risk of material misstatement.

In such circumstances, the auditor may need to reevaluate the planned audit procedures, based on the revised consideration of assessed risks *of material misstatement* for all or ~~some~~ *and the effect on the* ~~of~~ *significant* classes of transactions, account balances, or disclosures and ~~related their relevant~~ assertions. *SAS No. 145* Section 315 contains further guidance on revising the auditor's risk assessment. <sup>fn 13 15</sup>

<sup>fn 13 15</sup>[Footnote omitted for purposes of this SAS.]

[No amendment to renumbered paragraphs .A77–.A78.]

**.A77.A79** The auditor's conclusion of whether sufficient appropriate audit evidence has been obtained is both at the relevant assertion level as well as the financial statement level. Section 500 enables the auditor to evaluate the results of audit procedures to inform the auditor's overall conclusion about whether sufficient appropriate audit evidence has been obtained as required by paragraph .28. The auditor's professional judgment about what constitutes sufficient appropriate audit evidence is influenced by the following additional factors:

- significance of the potential misstatement in the relevant assertion and the likelihood of its having a material effect, individually or aggregated with other potential misstatements, on the financial statements (see section 450, *Evaluation of Misstatements Identified During the Audit*).
- effectiveness of management's responses and controls to address the risks.
- experience gained during previous audits with respect to similar potential misstatements.
- ~~results of audit procedures performed, including whether the such~~ audit procedures ~~that were performed~~ identified specific instances of fraud or error.
- ~~source and reliability of the available information.~~
- ~~persuasiveness of the audit evidence.~~
- understanding of the entity and its environment, *the applicable financial reporting framework, and including it's the entity's system of* internal control.

**Commented [LCD18]:** Revised by SAS 142 – not an amendment

**Commented [LCD19]:** Removed by SAS 142 – not an amendment

### Documentation

**.A78.A80** The form and extent of audit documentation is a matter of professional judgment and is influenced by the nature, size, and complexity of the entity; *system of*

internal control of the entity; availability of information from the entity; and the audit methodology and technology used in the audit.

[No further amendment to AU-C section 330.]

### **AU-C Section 402, *Audit Considerations Relating to an Entity Using a Service Organization***

10. The amendment to AU-C section 402 is effective for audits of financial statements for periods ending on or after December 15, 2023.

#### **Introduction**

#### **Scope of This Section**

**.01** This section addresses the user auditor's responsibility for obtaining sufficient appropriate audit evidence in an audit of the financial statements of a user entity that uses one or more service organizations. Specifically, it expands on how the user auditor applies **SAS No. 145** ~~section 315~~, *Understanding the Entity and Its Environment and Assessing the Risks of Material Misstatement*, and section 330, *Performing Audit Procedures in Response to Assessed Risks and Evaluating the Audit Evidence Obtained*, in obtaining an understanding of the user entity, including **the entity's system of** internal control relevant to **the preparation of the financial statements** ~~the audit~~, sufficient to identify and assess the risks of material misstatement and in designing and performing further audit procedures responsive to those risks.

[No amendment to paragraph .02.]

**.03** Services provided by a service organization are relevant to the audit of a user entity's financial statements when those services and the controls over them affect the user entity's information system, ~~including related business processes, relevant to financial reporting~~ **the preparation of the financial statements**. ~~Although most controls at the service organization are likely to relate to financial reporting~~ **be part of the user entity's information system relevant to the preparation of the financial statements or other related controls also may be relevant to the audit**, such as controls over the safeguarding of assets. A service organization's services are part of a user entity's information system, ~~including related business processes, relevant to financial reporting~~ if these services affect any of the following:

- a. **How information relating to significant classes of transactions, account balances, and disclosures flows through the user entity's information system, whether manually or using IT, and whether obtained from within or outside the general ledger and subsidiary ledgers.** ~~The classes of transactions in the user~~

~~entity's operations that are significant to the user entity's financial statements;  
*This includes when the service organization affects the following:*~~

~~*b.i. The procedures within both IT and manual systems by which the user entity's transactions are initiated, authorized, recorded, processed, corrected as necessary, transferred to the general ledger, and reported in the financial statements; **How transactions of the user entity are initiated and how information about them is recorded, processed, corrected as necessary, and incorporated in the general ledger and reported in the financial statements***~~

~~*ii. How information about events or conditions, other than transactions, is captured, processed, and disclosed by the user entity in the financial statements*~~

~~*e. b. The related accounting records, supporting information, and specific accounts in the user entity's financial statements, **and other supporting records relating to the flows of information in paragraph 3a.** that are used to initiate, authorize, record, process, and report the user entity's transactions. This includes the correction of incorrect information and how information is transferred to the general ledger; the records may be in either manual or electronic form;*~~

~~*d. How the user entity's information system captures events and conditions, other than transactions, that are significant to the financial statements;*~~

~~*e c. The financial reporting process used to prepare the user entity's financial statements **from the records described in paragraph .03b**, including **as it relates to disclosures and accounting estimates relating to significant classes of transactions, account balances, and disclosures** accounting estimates and disclosures; and*~~

~~*d. The entity's IT environment relevant to preceding subparagraphs (a)–(c)*~~

~~*f. Controls surrounding journal entries, including nonstandard journal entries used to record nonrecurring, unusual transactions, or adjustments.*~~

**Commented [LCD20]:** Removed bold italics as this comes from current wording in GAAS – not marked as a change

[No amendment to paragraph .04–.06.]

## Objectives

.07 The objectives of the user auditor, when the user entity uses the services of a service organization, are to

- a. obtain an understanding of the nature and significance of the services provided by the service organization and their effect on the user entity's **system of** internal control relevant to the audit, sufficient to **provide an appropriate basis for the identification and assessment of** identify and assess the risks of material misstatement.

- b. design and perform audit procedures responsive to those risks.

[No amendment to paragraph .08–.09.]

**Obtaining an Understanding of the Services Provided by a Service Organization, Including Internal Control**

...

**.10** When obtaining an understanding of *the entity's system of* internal control ~~relevant to the audit~~ in accordance with **SAS No. 145**~~section 315~~,<sup>fn 2</sup> the user auditor should **identify controls in the control activities component** ~~evaluate the design and implementation of relevant controls~~ at the user entity **from those** that relate to the services provided by the service organization, including those that are applied to the transactions processed by the service organization, **and evaluate their design and determine whether they have been implemented.**<sup>fn 2 3</sup>

<sup>fn 2</sup> Paragraph 27 of SAS No. 145.

<sup>fn 2 3</sup> Paragraph 13-29 of ~~section 315~~ SAS No. 145.

**.11** The user auditor should determine whether a sufficient understanding of the nature and significance of the services provided by the service organization and their effect on the user entity's *system of* internal control ~~relevant to the audit~~ has been obtained to provide an **appropriate** basis for the identification and assessment of *the* risks of material misstatement.

**.12** If the user auditor is unable to obtain a sufficient understanding from the user entity, the user auditor should obtain that understanding from one or more of the following procedures:

- a. Obtaining and reading a type 1 or type 2 report, if available
- b. Contacting the service organization, through the user entity, to obtain specific information
- c. Visiting the service organization and performing procedures that will provide the necessary information about the ~~relevant~~ controls at the service organization **that address risks of material misstatement at the assertion level in accordance with SAS No. 145**~~section 315-315~~<sup>fn 4</sup>
- d. Using another auditor to perform procedures that will provide the necessary information about the ~~relevant~~ controls at the service organization **that address risks of material misstatement at the assertion level in accordance with SAS No. 145**~~section 315-315~~<sup>fn 5</sup> (Ref: par. .A15–.A20)

<sup>fn 4</sup> Paragraphs 35–37 of SAS No. 145.

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**Commented [LCD22]:** Mark as bold italics to show amendment

**Commented [LCD23]:** Added back and marked as strikethrough to show amendment to GAAS

**Commented [LCD24]:** Marked as bold italics to show amendment that was not marked

*fn 5 Paragraphs 35–37 of SAS No. 145.*

[Subsequent footnotes renumbered. No amendment to paragraph .13.]

***Using a Type 1 or Type 2 Report to Support the User Auditor’s Understanding of the Service Organization***

...

.14 If the user auditor plans to use a type 1 or type 2 report as audit evidence to support the user auditor’s understanding about the design and implementation of ***identified*** controls at the service organization, the user auditor should

**Commented [LCD25]:** Marked as bold italics to show amendment

- a. evaluate whether the type 1 report is as of a date, or in the case of a type 2 report, is for a period that is appropriate for the user auditor’s purposes;
- b. evaluate the sufficiency and appropriateness of the evidence provided by the report for the understanding of ~~the user entity’s internal control~~ ***the identified controls at the service organization*** relevant to the audit; and
- c. determine whether complementary user entity controls identified by the service organization ~~are relevant in addressing the~~ ***address the*** risks of material misstatement relating to the relevant assertions in the user entity’s financial statements and, if so, obtain an understanding of whether the user entity has designed and implemented such controls. (Ref: par. .A23–.A24)

**Commented [LCD26]:** add back “control” and strikethrough to reflect GAAS

**Commented [LCD27]:** add bold italics to show amendment that was not marked

**Commented [LCD28]:** add back extant content and mark as strikethrough to show amendment

[No amendment to paragraphs .15–.16.]

**Responding to the Assessed Risks of Material Misstatement**

...

***Tests of Controls***

...

***Using a Type 2 Report as Audit Evidence That Controls at the Service Organization Are Operating Effectively***

.17 If, in accordance with paragraph .16a, the user auditor plans to use a type 2 report as audit evidence that ***identified*** controls at the service organization are operating effectively, the user auditor should determine whether the service auditor's report provides sufficient appropriate audit evidence about the effectiveness of the controls to support the user auditor's risk assessment by

- a. evaluating whether the type 2 report is for a period that is appropriate for the user auditor's purposes;



- b. determining whether complementary user entity controls identified by the service organization ~~are relevant in addressing~~ **address** the risks of material misstatement relating to the relevant assertions in the user entity's financial statements and, if so, obtaining an understanding of whether the user entity has designed and implemented such controls and, if so, testing their operating effectiveness;
- c. evaluating the adequacy of the time period covered by the tests of controls and the time elapsed since the performance of the tests of controls; and
- d. evaluating whether the tests of controls performed by the service auditor and the results thereof, as described in the service auditor's report, are relevant to the assertions in the user entity's financial statements and provide sufficient appropriate audit evidence to support the user auditor's risk assessment. (Ref: par. .A32-.A40)

[No amendment to paragraphs .18-.A13.]

**Obtaining an Understanding of the Services Provided by a Service Organization, Including Internal Control**

...

***Understanding the Controls Relating to Services Provided by the Service Organization***

...

**.A14** ~~As noted in **SAS No. 145** section 315, for some risks the auditor may judge that it is not possible or practicable to obtain sufficient appropriate audit evidence only from substantive procedures.~~ <sup>fn 8</sup> Such risks may relate to the inaccurate or incomplete recording of routine and significant classes of transactions and account balances that may involve highly automated processing with little or no manual intervention. Risks related to such automated processing may be particularly present when the user entity uses a service organization. In such cases, the user **auditor is required to identify** ~~entity's controls over such risks are relevant to the audit and the user auditor is required to obtain an understanding of~~ and to evaluate **the design of** such controls **and determine whether they have been implemented** in accordance with paragraphs ~~9-10~~ of this section.

<sup>fn 8</sup> [Footnote omitted for purposes of this SAS.]

[No amendment to paragraph .A15-.A18.]

***Further Procedures When a Sufficient Understanding Cannot Be Obtained From the User Entity***

...

**.A19** Another auditor may be used to perform procedures that will provide the necessary information about the ~~relevant~~ controls at the service organization **related to**

**Commented [LCD29]:** Added back and included as strike through to reflect amendment.

**services provided to the user entity.** If a type 1 or type 2 report has been issued, the user auditor may use the service auditor to perform these procedures as the service auditor has an existing relationship with the service organization. The user auditor using the work of another auditor may find the guidance in section 600, *Special Considerations — Audits of Group Financial Statements (Including the Work of Component Auditors)*, useful as it relates to understanding another auditor (including that auditor's independence and professional competence); involvement in the work of another auditor in planning the nature, extent, and timing of such work; and in evaluating the sufficiency and appropriateness of the audit evidence obtained. <sup>fn 6 9</sup>

<sup>fn 6 9</sup> [Footnote omitted for purposes of this SAS.]

[No amendment to paragraphs .A20–.A23.]

***Using a Type 1 or Type 2 Report to Support the User Auditor's Understanding of the Service Organization***

...

**.A24** A type 1 or type 2 report, along with information about the user entity, may assist the user auditor in obtaining an understanding of the following:

- a. The controls at the service organization that may affect the processing of the user entity's transactions, including the use of subservice organizations
- b. The flow of significant transactions through the service organization's system to determine the points in the transaction flow where material misstatements in the user entity's financial statements could occur
- c. The control objectives stated in the description of the service organization's system that are relevant to the user entity's financial statement assertions
- d. Whether controls at the service organization are suitably designed and implemented to prevent, or detect and correct, processing errors that could result in material misstatements in the user entity's financial statements

A type 1 or type 2 report may assist the user auditor in obtaining a sufficient understanding to identify and assess the risks of material misstatement of the user entity's financial statements. A type 1 report, however, does not provide any evidence of the operating effectiveness of the ~~relevant~~ controls.

[No amendment to paragraphs .A25–.A30.]

**Responding to the Assessed Risks of Material Misstatement**

...

***Tests of Controls***

**.A31** The user auditor is required by section 330 to design and perform tests of controls to obtain sufficient appropriate audit evidence concerning the operating effectiveness of ~~relevant~~ controls in certain circumstances.<sup>fn & II</sup> In the context of a service organization, this requirement applies when

- a. the user auditor's assessment of risks of material misstatement includes an expectation that the controls at the service organization are operating effectively (that is, the user auditor intends to rely on the operating effectiveness of controls at the service organization in determining the nature, timing, and extent of substantive procedures); or
- b. substantive procedures alone, or in combination with tests of the operating effectiveness of controls at the user entity, cannot provide sufficient appropriate audit evidence at the assertion level.

<sup>fn & II</sup> [Footnote omitted for purposes of this SAS.]

**.A32** If a type 2 report is not available, a user auditor may contact the service organization through the user entity to request that a service auditor be engaged to perform a type 2 engagement that includes tests of the operating effectiveness of the ~~relevant~~ controls or the user auditor may use another auditor to perform agreed-upon procedures at the service organization that test the operating effectiveness of those controls. A user auditor may also visit the service organization and perform tests of ~~relevant~~ controls if the service organization agrees to it. The user auditor's risk assessments are based on the combined evidence provided by the service auditor's report and the user auditor's own procedures.

[No amendment to paragraphs .A33–.A34.]

*Using a Type 2 Report as Audit Evidence That Controls at the Service Organization Are Operating Effectively*

...

**.A35** It may also be necessary for the user auditor to obtain additional evidence about significant changes in the ~~relevant~~ controls at the service organization during a period outside the period covered by the type 2 report, or to determine what additional audit procedures need to be performed (for example, when little or no overlap exists between the period covered by the type 2 report and the period covered by the user entity's financial statements). Relevant factors in determining what additional audit evidence to obtain about controls at the service organization that were operating outside the period covered by the service auditor's report may include the following:

- The significance of the assessed risks of material misstatement at the assertion level

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- The specific controls that were tested during the interim period and significant changes to them since they were tested including changes in the information systems, processes, and personnel
- The degree to which audit evidence about the operating effectiveness of those controls was obtained
- The length of the remaining period
- The extent to which the user auditor intends to reduce further substantive procedures based on the reliance on controls
- The effectiveness of the control environment and ***the user entity's process to monitoring the system of internal controls***. ~~at the user entity~~

**.A36** Additional audit evidence may be obtained, for example, by performing tests of controls that operated during the remaining period or testing the user entity's ***process to monitoring the system of internal controls***.

[No amendment to paragraphs .A37--A40.]

**.A41** *Communication of significant deficiencies and material weaknesses in internal control identified during the audit.* The user auditor is required by section 265, *Communicating Internal Control Related Matters Identified in an Audit*, to communicate in writing to management and those charged with governance significant deficiencies and material weaknesses identified during the audit. <sup>fn 9 12</sup> Matters related to the use of a service organization that the user auditor may identify during the audit and may communicate to management and those charged with governance of the user entity include the following:

- Any ***controls within the entity's process to monitor the system of internal control*** ~~needed monitoring controls~~ that could be implemented by the user entity, including those identified as a result of obtaining a type 1 or type 2 report
- Instances when complementary user entity controls identified in the type 1 or type 2 report are not implemented at the user entity
- Controls that may be needed at the service organization that do not appear to have been implemented or that were implemented, but are not operating effectively

The auditor also may communicate other control related matters, including deficiencies that are not significant deficiencies or material weaknesses.

<sup>fn 9 12</sup> [Footnote omitted for purposes of this SAS.]

[No further amendment to AU-C section 402.]

**AU-C Section 501, *Audit Evidence — Specific Considerations for Selected Items***

11. The amendment to AU-C section 501 is effective for audits of financial statements for periods ending on or after December 15, 2023.

[No amendment to paragraphs .01–.A23.]

**Inventory**

***Attendance at Physical Inventory Counting***

...

***Evaluate Management’s Instructions and Procedures***

**.A23A24** Matters relevant in evaluating management’s instructions and procedures for recording and controlling the physical inventory counting include whether they address, for example, the following:

- The application of appropriate controls activities (for example, the collection of used physical inventory count records, accounting for unused physical inventory count records, and count and recount procedures)
- The accurate identification of the stage of completion of work in progress; slow moving, obsolete, or damaged items; and inventory owned by a third party (for example, on consignment)
- The procedures used to estimate physical quantities, when applicable, such as may be needed in estimating the physical quantity of a coal pile
- Control over the movement of inventory between areas and the shipping and receipt of inventory before and after the cutoff date

[No further amendment to AU-C section 501.]

**AU-C Section 505, *External Confirmations***

12. The amendment to AU-C section 505 is effective for audits of financial statements for periods ending on or after December 15, 2023.

**Commented [HH30]:** New edit. Change accepted to illustrate conforming amendment

[No amendment to paragraphs .01–.02.]

### Introduction

...

### External Confirmation Procedures to Obtain Audit Evidence

...

**.03** Other AU-C sections recognize the importance of external confirmations as audit evidence; for example

- section 330 discusses the auditor’s responsibility (*a*) to design and implement overall responses to address the assessed risks of material misstatement at the financial statement level and (*b*) to design and perform further audit procedures whose nature, timing, and extent are based on, and are responsive to, the assessed risks of material misstatement at the relevant assertion level.<sup>fn 3</sup> ~~In addition, section 330 requires that, irrespective of the assessed risks of material misstatement, the auditor design and perform substantive procedures for all relevant assertions related to each material class of transactions, account balance, and disclosure.~~<sup>fn 4</sup> The auditor is required to consider whether external confirmation procedures are to be performed as substantive audit procedures and is required to use external confirmation procedures for accounts receivable unless
  - the overall account balance is immaterial,
  - external confirmation procedures would be ineffective, or
  - the auditor’s assessed level of risk of material misstatement at the relevant assertion level is low, and the other planned substantive procedures address the assessed risk.<sup>fn 5</sup>
- section 330 requires that the auditor obtain more persuasive audit evidence the higher the auditor’s assessment of risk.<sup>fn 6</sup> To do this, the auditor may increase the quantity of the evidence or obtain evidence that is more relevant or reliable, or both. For example, the auditor may place more emphasis on obtaining evidence directly from third parties or obtaining corroborating evidence from a number of independent sources. Section 330 also indicates that external confirmation procedures may assist the auditor in obtaining audit evidence with the high level of reliability that the auditor requires to respond to significant risks of material misstatement, whether due to fraud or error.<sup>fn 7</sup>

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- section 240, *Consideration of Fraud in a Financial Statement Audit*, indicates that the auditor may design confirmation requests to obtain additional corroborative information as a response to address the assessed risks of material misstatement due to fraud at the assertion level.<sup>fn 8</sup>
- section 500A indicates that corroborating information obtained from a source independent of the entity (such as external confirmations) may increase the assurance the auditor obtains from evidence existing within the accounting records or representations made by management.<sup>fn 9</sup>

<sup>fn 3</sup> [Footnote omitted for purposes of this SAS.]

<sup>fn 4</sup> Paragraph .18 of section 330.

<sup>fns 5-9</sup> [Footnotes omitted for purposes of this SAS.]

[No further amendment to AU-C section 505.]

### **AU-C Section 530, *Audit Sampling***

12. The amendment to AU-C section 530 is effective for audits of financial statements for periods ending on or after December 15, 2023.

[No amendment to paragraphs .01–.A9.]

### **Sample Design, Size, and Selection of Items for Testing**

#### ***Sample Design***

**.A10** In considering the test objective and characteristics of a population for tests of controls, the auditor makes an assessment of the expected rate of deviation based on the auditor's understanding of the ~~relevant~~ controls. This assessment is made in order to design an audit sample and determine sample size. For example, if the expected rate of deviation is unacceptably high, the auditor will normally decide not to perform tests of controls. Similarly, for tests of details, the auditor makes an assessment of the expected misstatement in the population. If the expected misstatement is high, 100 percent examination or increasing the sample size may be appropriate when performing tests of details.

[No further amendment to AU-C section 530.]

**AU-C Section 550, *Related Parties***

13. The amendment to AU-C section 550 is effective for audits of financial statements for periods ending on or after December 15, 2023.

[No amendment to paragraphs .01–.A6.]

**Risk Assessment Procedures and Related Activities**

***Understanding the Entity’s Related Party Relationships and Transactions***

*Discussion Among the Engagement Team*

.A7Matters that may be addressed in the discussion among the engagement team include the following:

- The nature and extent of the entity’s relationships and transactions with related parties (using, for example, the auditor’s record of identified related parties updated after each audit)
- An emphasis on the importance of maintaining professional skepticism throughout the audit regarding the potential for material misstatement associated with related party relationships and transactions
- The circumstances or conditions of the entity that may indicate the existence of related party relationships or transactions that management has not identified or disclosed to the auditor (for example, a complex organizational structure, use of entities formed to accomplish specific purposes,<sup>fn 22</sup> or an inadequate information system)
- The records or documents that may indicate the existence of related party relationships or transactions
- The importance that management and those charged with governance attach to the identification of, appropriate accounting for, and disclosure of related party relationships and transactions and the related risk of management override of ~~relevant~~ controls

<sup>fn 22</sup> [Footnote omitted for purposes of this SAS.]

[No amendment to paragraphs .A8–.A9.]

*The Identity of the Entity’s Related Parties*

...



**.A10** However, if the entity does not have such information systems in place, management may not be aware of the existence of all related parties. Nevertheless, the requirement to make the inquiries specified by paragraph .14 still applies because management may be aware of parties that meet the related party definition set out in GAAP. In such a case, however, the auditor's inquiries regarding the identity of the entity's related parties are likely to form part of the auditor's risk assessment procedures and related activities performed in accordance with *SAS No. 145*~~section 315~~ to obtain information regarding the following: *the entity's organizational structure, ownership, governance, and business model.*<sup>fn 23</sup>

- ~~The entity's ownership and governance structures~~
- ~~The types of investments that the entity is making and plans to make~~
- ~~The way the entity is structured and how it is financed~~

In the particular case of common control relationships, because management is more likely to be aware of such relationships if they have economic significance to the entity, the auditor's inquiries are likely to be more effective if they are focused on whether parties with which the entity engages in significant transactions or shares resources to a significant degree are related parties.

<sup>fn 23</sup> [Footnote omitted for purposes of this SAS.]

[No amendment to paragraphs .A11–.A20.]

#### *The Entity's Controls Over Related Party Relationships and Transactions*

...

**.A21** *Considerations specific to smaller entities.* Controls ~~activities~~ in smaller entities are likely to be less formal, and smaller entities may have no documented processes for dealing with related party relationships and transactions. An owner-manager may mitigate some of the risks arising from related party transactions or potentially increase those risks through active involvement in all the main aspects of the transactions. For such entities, the auditor may obtain an understanding of the related party relationships and transactions, and any controls that may exist over these, through inquiry of management combined with other procedures, such as observation of management's oversight and review activities and inspection of available relevant documentation.

[No amendment to paragraphs .A22–.A29.]

#### *Sharing Related Party Information With the Engagement Team*

**.A30** Relevant related party information shared with the engagement team members may include the following:

- The nature of the related party relationships and transactions

- Significant or complex related party relationships or transactions that may *be associated with significant risks* ~~require special audit consideration~~, particularly transactions in which management or those charged with governance are financially involved

The exchange of information is most useful if made at an early stage of the audit.

[No amendment to paragraphs .A31–.A37.]

### **Responses to the Risks of Material Misstatement Associated With Related Party Relationships and Transactions**

...

**.A38** Depending upon the results of the auditor’s risk assessment procedures, the auditor may consider it appropriate to obtain audit evidence without testing the entity’s controls over related party relationships and transactions. In some circumstances, however, it may not be possible to obtain sufficient appropriate audit evidence from substantive audit procedures alone, regarding the risks of material misstatement associated with related party relationships and transactions. For example, when intragroup transactions between the entity and its components are numerous and a significant amount of information regarding these transactions is initiated, authorized, recorded, processed, or reported electronically in an integrated system, the auditor may determine that it is not possible to design effective substantive audit procedures that by themselves would reduce the risks of material misstatement associated with these transactions to an acceptably low level. In such a case, in meeting the requirement of section 330 to obtain sufficient appropriate audit evidence about the operating effectiveness of ~~relevant~~ controls, the auditor is required to test the entity’s controls over the completeness and accuracy of the recording of the related party relationships and transactions.<sup>fn 31</sup>

<sup>fn 31</sup> [Footnote omitted for purposes of this SAS.]

[No further amendment to AU-C section 550.]

### **AU-C Section 600, *Special Considerations — Audits of Group Financial Statements (Including the Work of Component Auditors)***

14. The amendment to AU-C section 600 is effective for audits of group financial statements for periods ending on or after December 15, 2023.

[No amendment to paragraphs .01–.19.]

### **Understanding the Group, Its Components, and Their Environments**

**.20** The auditor is required to identify and assess the risks of material misstatement through obtaining an understanding of the entity and its environment, *the applicable reporting framework, and the system of internal control*.<sup>fn 7</sup> The group engagement team should

- a. enhance its understanding of the group, its components, and their environments, including group-wide controls, obtained during the acceptance or continuance stage.
- b. obtain an understanding of the consolidation process, including the instructions issued by group management to components. (Ref: par. .A31–.A37)

<sup>fn 7</sup> [Footnote omitted for purposes of this SAS.]

[No amendment to paragraphs .21–.A6.]

#### Definitions

...

#### Significant Component

...

**.A7** The group engagement team also may identify a component as likely to include significant risks of material misstatement of the group financial statements due to its specific nature or circumstances (~~that is, risks that require special audit consideration~~<sup>fn14</sup>). For example, a component could be responsible for foreign exchange trading and, thus, expose the group to a significant risk of material misstatement, even though the component is not otherwise of individual financial significance to the group.

<sup>fn 14</sup> Paragraphs .28–.30 of section 315. [Footnote omitted for purposes of this SAS.]

[No amendment to paragraphs .A7–.A93.]

#### Appendix A — Understanding the Group, Its Components, and Their Environments — Examples of Matters About Which the Group Engagement Team Obtains an Understanding

**.A94** The examples provided cover a broad range of matters; however, not all matters are relevant to every group audit engagement, and the list of examples is not necessarily complete.

#### Group-Wide Controls

Group-wide controls may include a combination of the following:

- Regular meetings between group and component management to discuss business

**Commented [LCD31]:** Added fn in and show as strikethrough because this is part of the amendment to remove the content in the parens including the fn.

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developments and review performance

- Monitoring of components' operations and their financial results, including regular reporting routines, which enables group management to monitor components' performance against budgets and take appropriate action
- Group management's risk assessment process (that is, the process for identifying, analyzing, and managing business risks, including the risk of fraud, that may result in material misstatement of the group financial statements)
- Monitoring, controlling, reconciling, and eliminating intragroup account balances, transactions, and unrealized profits or losses at group level
- A process for monitoring the timeliness and assessing the accuracy and completeness of financial information received from components
- A central IT system controlled by the same general IT controls for all or part of the group
- Controls activities within an IT system that are common for all or some components
- ***Controls within the group's process to monitor the system of internal controls***, including activities of the internal audit function and self-assessment programs
- Consistent policies and procedures, including a group financial reporting procedures manual
- Group-wide programs, such as codes of conduct and fraud prevention programs
- Arrangements for assigning authority and responsibility to component management

Commented [LCD32]: Removed bold italics as this is part of the extant content

The internal audit function may be regarded as part of group-wide controls, for example, when the function is centralized. [Section 610](#), *Using the Work of Internal Auditors*, addresses the group engagement team's evaluation of whether the internal audit function's organizational status and relevant policies and procedures adequately support the objectivity of internal auditors, the level of competence of the internal audit function, and whether the function applies a systematic and disciplined approach when the group engagement team expects to use the function's work.<sup>fn 1</sup>

<sup>fn 1</sup> [Footnote omitted for purposes of this SAS.]

...

[No further amendment to appendix A. No amendment to paragraph .A95.]

**Appendix C — Required and Additional Matters Included in the Group Engagement Team's Letter of Instruction**

**.A96** The following matters are relevant to the planning of the work of a component auditor:

...

The following matters are relevant to the conduct of the work of the component auditor:

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- The findings of the group engagement team’s tests of controls ~~activities~~ of a processing system that is common for all or some components and tests of controls to be performed by the component auditor

...

[No further amendment to appendix C. No further amendment to AU-C section 600.]

**AU-C Section 620, *Using the Work of an Auditor’s Specialist***

15. The amendment to AU-C section 620 is effective for audits of financial statements for periods ending on or after December 15, 2023.

[No amendment to paragraphs .01–.A4.]

**Determining the Need for an Auditor’s Specialist**

.A5 An auditor’s specialist may be needed to assist the auditor in one or more of the following:

- Obtaining an understanding of the entity and its environment, *the applicable financial reporting framework, and including ~~its~~ the entity’s system of* internal control
- Identifying and assessing the risks of material misstatement
- Determining and implementing overall responses to assessed risks at the financial statement level
- Designing and performing additional audit procedures to respond to assessed risks at the relevant assertion level, which may comprise tests of controls or substantive procedures
- Evaluating the sufficiency and appropriateness of audit evidence obtained in forming an opinion on the financial statements

Commented [LCD33]: Added “its” to reflect extant content to be shown as strikethrough.

[No further amendment to AU-C section 620.]

**AU-C Section 805, *Special Considerations — Audits of Single Financial Statements and Specific Elements, Accounts, or Items of a Financial Statement***

16. The amendment to AU-C section 805 is effective for audits of single financial statements or specific elements, accounts, or items of a financial statement as of or for periods ending on or after December 15, 2023.

[No amendment to paragraphs .01–.A6.]

### Considerations When Accepting the Engagement

#### *Application of GAAS*

...

#### *Complying With Relevant Requirements*

.A7 Compliance with the requirements of AU-C sections relevant to the audit of a single financial statement or a specific element of a financial statement may not be practicable when the auditor is not also engaged to audit the entity's complete set of financial statements. In such cases, the auditor often does not have the same understanding of the entity and its environment, ***the applicable financial reporting framework, and including*** its internal control, as an auditor who also audits the entity's complete set of financial statements. The auditor also does not have the audit evidence about the general quality of the accounting records or other accounting information that would be acquired in an audit of the entity's complete set of financial statements. Accordingly, the auditor may need further evidence to corroborate audit evidence acquired from the accounting records. Also see paragraph .A18.

[No further amendment to AU-C section 805.]

### AU-C Section 930, *Interim Financial Information*

17. The amendment to AU-C section 930 is effective for reviews of interim financial information for interim periods of **fiscal years beginning on or after** December 15, 2023.

**Commented [AM34]:** Section 930 has this eff date language. Maintaining consistent effective date structure for 930

[No amendment to paragraphs .01–.10.]

### Procedures for a Review of Interim Financial Information

#### *Understanding the Entity and Its Environment, the Applicable Financial Reporting Framework, and ~~Including Its~~ the Entity's System of Internal Control*

.11 To plan and conduct the engagement, the auditor should have an understanding of the entity and its environment, ***the applicable financial reporting framework, and including its the entity's system of*** internal control as it relates to the preparation and fair presentation of both annual and interim financial information, sufficient to be able to

- a. identify the types of potential material misstatements in the interim financial information and consider the likelihood of their occurrence.

- b. select the inquiries and analytical procedures that will provide the auditor with a basis for reporting whether the auditor is aware of any material modifications that should be made to the interim financial information for it to be in accordance with the applicable financial reporting framework.

[No amendment to paragraphs .12–.A6.]

#### **Procedures for a Review of Interim Financial Information**

##### ***Understanding the Entity and Its Environment, the Applicable Financial Reporting Framework, ~~Including Its~~ and the Entity’s System of Internal Control***

.A7As required by ~~SAS No. 145~~ ~~section 315~~, *Understanding the Entity and Its Environment and Assessing the Risks of Material Misstatement*, the auditor who has audited the entity’s financial statements for one or more annual periods would have obtained an understanding of the entity and its environment, ***the applicable financial reporting framework, ~~including its~~ and the entity’s system of*** internal control as it relates to the preparation and fair presentation of annual financial information, that was sufficient to conduct the audit. Internal control over the preparation and fair presentation of interim financial information may differ from internal control over the preparation and fair presentation of annual financial statements because certain accounting principles and practices used for interim financial information may differ from those used for the preparation of annual financial statements (for example, the use of estimated effective income tax rates for the preparation of interim financial information).

[No amendment to paragraphs .A8–.A10.]

##### ***Analytical Procedures, Inquiries, and Other Review Procedures***

###### *Analytical Procedures*

.A11 Procedures for conducting a review of interim financial information generally are limited to analytical procedures, inquiries, and other procedures that address significant accounting and disclosure matters relating to the interim financial information. The auditor’s understanding of the entity and its environment, ***the applicable financial reporting framework, and ~~including its~~ the entity’s ~~including its~~ system of*** internal control, the results of the risk assessments relating to the preceding audit, and the auditor’s consideration of materiality as it relates to the interim financial information, influences the nature and extent of the inquiries made and analytical procedures performed. For example, if the auditor becomes aware of a significant change in the entity’s controls at a particular location, the auditor may consider the following procedures:

- Making additional inquiries, such as whether management monitored the changes and considered whether they were operating as intended
- Employing analytical procedures with a more precise expectation

[No further amendment to AU-C section 930.]

**Amendment to SAS No. 128, *Using the Work of Internal Auditors* (AICPA, *Professional Standards*, AU-C sec. 610)**

18. The amendment to AU-C section 610 is effective for audits of financial statements for periods ending on or after December 15, 2023.

**AU-C Section 610, *The Auditor's Consideration of the Internal Audit Function in an Audit of Financial Statements***

[No amendment to paragraphs .01–.04.]

**Relationship Between Section 315 and This Section**

.05 Many entities establish internal audit functions as part of their internal control and governance structures. The objectives and scope of an internal audit function, the nature of its responsibilities, and its organizational status, including the function's authority and accountability, vary widely and depend on the size and structure of the entity and the requirements of management and those charged with governance. ~~Section 315 SAS No. 145~~ addresses how the knowledge and experience of the internal audit function can inform the external auditor's understanding of the entity and its environment, *the applicable financial reporting framework and the entity's system of internal control*, and identification and assessment of risks of material misstatement. ~~Section 315 SAS No. 145~~<sup>fn 1</sup> also explains how effective communication between the internal and external auditors creates an environment in which the external auditor can be informed by the internal auditor of significant matters that may affect the external auditor's work.

**Commented [LCD35]:** Commas revised to reflect ISA construct  
Is bold, italics content necessary to add?

<sup>fn 1</sup> [Footnote omitted for purposes of this SAS.]

[No amendment to paragraphs .06–.A2.]

**Definition of *Internal Audit Function***

...

.A3 However, those in the entity with operational and managerial duties and responsibilities outside of the internal audit function would ordinarily face threats to their objectivity that would preclude them from being treated as part of an internal audit function for the purpose of this section, although they may perform controls activities that can be tested in accordance with section 330.<sup>fn 7</sup> For this reason, monitoring controls performed by an owner-manager would not be considered equivalent to an internal audit function.



<sup>fn 7</sup> [Footnote omitted for purposes of this SAS.]

[No amendment to paragraphs .A4–.A11.]

**Determining Whether, in Which Areas, and to What Extent the Work of the Internal Audit Function Can Be Used in Obtaining Audit Evidence**

***Evaluating the Internal Audit Function***

...

*Application of a Systematic and Disciplined Approach, Including Quality Control*

**.A12** The application of a systematic and disciplined approach to planning, performing, supervising, reviewing, and documenting its activities distinguishes the activities of the internal audit function from other monitoring controls activities that may be performed within the entity.

[No amendment to paragraphs .A13–.A25.]

***Determining the Nature and Extent of Work of the Internal Audit Function That Can Be Used in Obtaining Audit Evidence***

...

*Assessed Risk of Material Misstatement*

...

**.A26** As explained in ~~section 315~~*SAS No. 145*, <sup>fn 11</sup> significant risks ~~require special audit consideration~~ **are risks assessed close to the upper end of the spectrum of inherent risk** and, therefore, the external auditor's ability to use the work of the internal audit function in relation to significant risks will be restricted to procedures that involve limited judgment. In addition, when the risks of material misstatement is other than low, the use of the work of the internal audit function in obtaining audit evidence alone is unlikely to reduce audit risk to an acceptably low level and eliminate the need for the external auditor to perform some tests directly.

<sup>fn 11</sup> [Footnote omitted for purposes of this SAS.]

[No further amendment to AU-C section 610.]

**Amendment to SAS No. 130, *An Audit of Internal Control Over Financial Reporting That Is Integrated With an Audit of Financial Statements*, as Amended (AICPA, Professional Standards, AU-C sec. 940)**

19. The amendment to AU-C section 940 is effective for integrated audits for periods ending on or after December 15, 2023.

**AU-C Section 940, *An Audit of Internal Control Over Financial Reporting That Is Integrated With an Audit of Financial Statements***

[No amendment to paragraphs .01–.25.]

**Using a Top-Down Approach**

...

***Identifying Significant Classes of Transactions, Account Balances, and Disclosures, and Their Relative Assertions***

**.26** The auditor should identify significant classes of transactions, account balances, and disclosures, and their relevant assertions. To identify significant classes of transactions, account balances, and disclosures, and their relevant assertions, the auditor should evaluate the ~~qualitative and quantitative~~ **inherent** risk factors <sup>fn 6</sup> related to the financial statement line items and disclosures. (Ref: par. .A50–.A52)

<sup>fn 6</sup> See paragraph 12 of SAS No. 145, *Understanding the Entity and Its Environment and Assessing the Risks of Material Misstatement*.

[Subsequent footnotes renumbered. No amendment to paragraphs .27–.30.]

***Understanding Likely Sources of Misstatement***

...

**.31** The auditor should understand how IT affects the entity's flow of transactions and, as required by ~~section 315~~ **SAS No. 145, *Understanding the Entity and Its Environment and Assessing the Risks of Material Misstatement*, how the entity has responded to the entity's general information technology (IT) controls that address the risks arising from the use of IT.** <sup>fn 6</sup> <sup>fn 7</sup> (Ref: par. .A58)

<sup>fn 6</sup> <sup>fn 7</sup> Paragraph 22-26c of ~~section 315~~ **SAS No. 145, *Understanding the Entity and Its Environment and Assessing the Risks of Material Misstatement*.**

[No amendment to paragraphs .32–.56.]

**Concluding Procedures**

...

***Obtaining Written Representations***

**.57** In an audit of ICFR, the auditor should obtain written representations from management

- a. acknowledging management's responsibility for ~~establishing~~ **designing, implementing,** and maintaining effective ICFR;
- b. stating that management has performed an assessment of the effectiveness of the entity's ICFR and specifying the criteria;
- c. stating that management did not use the auditor's procedures performed during the integrated audit as part of the basis for management's assessment about ICFR;
- d. stating management's assessment about the effectiveness of the entity's ICFR based on the criteria as of a specified date;
- e. stating that management has disclosed to the auditor all deficiencies in the design or operation of ICFR, including separately disclosing to the auditor all such deficiencies that it believes to be significant deficiencies or material weaknesses;
- f. describing any fraud resulting in a material misstatement to the entity's financial statements and any other fraud that does not result in a material misstatement to the entity's financial statements, but involves senior management or management or other employees who have a significant role in the entity's ICFR;
- g. stating whether the significant deficiencies and material weaknesses identified and communicated to management and those charged with governance during previous engagements pursuant to paragraph .59 have been resolved and specifically identifying any that have not; and
- h. stating whether there were, subsequent to the date being reported on, any changes in ICFR or other conditions that might significantly affect ICFR, including any corrective actions taken by management with regard to significant deficiencies and material weaknesses (Ref: par. .A103)

[No amendment to paragraphs .58–.A5.]

#### **Definitions**

...

#### ***Internal Control Over Financial Reporting***

***.A6 For purposes of a financial statement audit, SAS No. 145, Understanding the Entity and Its Environment and Assessing the Risks of Material Misstatement, defines the term system of internal control and recognizes that internal control frameworks may use different terms that are similar to the concept of the system of internal control. This section defines the term internal control over financial reporting, which is a system of internal control that supports the preparation of reliable financial statements, to more clearly define ICFR for purposes of expressing an opinion on the effectiveness of ICFR, based on suitable and available criteria.***

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[Former paragraphs .A6–.A158 are renumbered as paragraphs .A7–.A159. No amendment to renumbered paragraphs .A7–.A21.]

### **Planning the Audit of ICFR**

~~.A21~~**.A22** Evaluating whether the following matters are important to the entity's financial statements and ICFR and, if so, how they may affect the auditor's procedures may assist the auditor in planning the audit of ICFR:

- Knowledge of the entity's ICFR obtained during other engagements performed by the auditor or, if applicable, during a review of a predecessor auditor's working papers
- Matters affecting the industry in which the entity operates, such as financial reporting practices, economic conditions, laws and regulations, and technological changes
- Matters relating to the entity's business, including its organization, operating characteristics, and capital structure
- The extent of recent changes, if any, in the entity, its operations, or its ICFR
- The auditor's preliminary judgments about financial statement materiality, risk, and other factors relating to the determination of material weaknesses
- Deficiencies previously communicated to those charged with governance or management
- Legal or regulatory matters of which the entity is aware
- The type and extent of available evidence related to the effectiveness of the entity's ICFR
- Preliminary judgments about the effectiveness of ICFR
- Public information about the entity relevant to the evaluation of the likelihood of material financial statement misstatements and the effectiveness of the entity's ICFR
- Knowledge about risks related to the entity evaluated as part of the auditor's *procedures regarding acceptance or continuance of the client relationship or the integrated audit engagement* ~~acceptance and retention evaluation.~~
- The relative complexity of the entity's operations

[No amendment to renumbered paragraphs .A23–.A25.]

### **Addressing the Risk of Fraud**

~~.A25~~**.A26** Section 240 addresses the auditor's identification and assessment of the risks of material misstatement due to fraud. <sup>fn 14</sup> ~~fn 15~~ Controls that might address these risks include

- controls over significant unusual transactions, particularly those that result in late or unusual journal entries;
- controls over journal entries and adjustments made in the period-end financial reporting process;

- controls over related party transactions;
- controls related to significant ~~management~~ **accounting** estimates; and
- controls that mitigate incentives for, and pressures on, management to falsify or inappropriately manage financial results.

<sup>fn-14 fn 15</sup> [Footnote omitted for purposes of this SAS.]

#### ***Using the Work of Internal Auditors or Others***

~~.A26~~**.A27** The extent of the procedures necessary to obtain the understanding required by paragraph .18 will vary, depending on the nature of those activities. In performing risk assessment procedures, the auditor is required to inquire of appropriate individuals within the internal audit function (if such function exists). <sup>fn-15</sup>  
<sup>fn 16</sup> ~~Section 315~~**SAS No. 145** provides guidance with respect to such inquiries and certain additional procedures based on the responses to such inquiries. <sup>fn-16 fn 17</sup>

<sup>fn-15 fn 16</sup> Paragraph ~~.06a~~ **14** of section ~~315~~ **SAS No. 145, Understanding the Entity and Its Environment and Assessing the Risks of Material Misstatement.**

<sup>fn-16 fn 17</sup> Paragraph ~~.A9–.A13~~ **.A25 and appendix D** of section ~~315~~ **SAS No. 145.**

[No amendment to renumbered paragraphs .A28–.A33.]

#### **Using a Top-Down Approach**

...

~~.A33~~**.A34** A top-down approach involves

- beginning at the financial statement level;
- using the auditor's understanding of the overall risks to ICFR;
- focusing on entity-level controls, **which may be indirect** <sup>fn 19</sup> **or direct controls** <sup>fn 20</sup> **as described in SAS No. 145;**
- working down to significant classes of transactions, account balances, and disclosures, and their relevant assertions, **which directs attention to classes of transactions, accounts, disclosures, and assertions that present a reasonable possibility of material misstatement of the financial statements;**
- ~~directing attention to classes of transactions, accounts, disclosures, and assertions that present a reasonable possibility of material misstatement of the financial statements;~~
- verifying the auditor's understanding of the risks in the entity's processes; and
- selecting controls for testing that sufficiently address the assessed risk of material misstatement to each relevant assertion.

<sup>fn 19</sup> See paragraph A113 of SAS No. 145.

<sup>fn 20</sup> See paragraph A141 of SAS No. 145.

[Subsequent footnotes further renumbered. No amendment to renumbered paragraphs .A35–.A50.]

***Identifying Significant Classes of Transactions, Account Balances, and Disclosures, and Their Relative Assertions***

***.A50A51*** ***Inherent*** Risk factors ***are*** relevant to the identification of significant classes of transactions, account balances, and disclosures, and their relevant assertions ~~include~~. ***Inherent risk factors may be qualitative or quantitative and affect the susceptibility of assertions to misstatement. Inherent risk factors are described in SAS No. 145.***

- ~~• size and composition of the account;~~
- ~~• susceptibility to misstatement due to errors or fraud;~~
- ~~• volume of activity, complexity, and homogeneity of the individual transactions processed through the account or reflected in the disclosure;~~
- ~~• nature of the account, class of transactions, or disclosure;~~
- ~~• accounting and reporting complexities associated with the account, class of transactions, or disclosure;~~
- ~~• exposure to losses in the account;~~
- ~~• possibility of significant contingent liabilities arising from the activities reflected in the account or disclosure;~~
- ~~• existence of related party transactions in the account; and~~
- ~~• changes from the prior period in the account, class of transactions, or disclosure characteristics.~~

***.A51A52*** The ***inherent*** risk factors ~~in paragraph .26~~ that the auditor is required to evaluate in the identification of significant classes of transactions, account balances, and disclosures, and their relevant assertions, are the same in the audit of ICFR as in the audit of the financial statements; accordingly, significant classes of transactions, account balances, and disclosures, and their relevant assertions, are the same in an integrated audit.

[No further amendment to AU-C section 940.]

***Amendment to SAS No. 134, Auditor Reporting and Amendments, Including Amendments Addressing Disclosures in the Audit of Financial Statements, as Amended, Section 701, Communicating Key Audit Matters in the Independent Auditor’s Report (AICPA, Professional Standards, AU-C sec. 701)***

20. The amendment to AU-C section 701 is effective for audits of financial statements for periods ending on or after December 15, 2023.

**AU-C Section 701, *Communicating Key Audit Matters in the Independent Auditor's Report***

[No amendment to paragraphs .01–.A17.]

**Determining Key Audit Matters**

...

***Considerations in Determining Those Matters That Required Significant Auditor Attention***

...

***Areas of Higher Assessed Risk of Material Misstatement, or Significant Risks Identified in Accordance With Section 315***

...

**.A18** ~~Section 315~~ **SAS No. 145** defines a *significant risk* as an identified and assessed risk of material misstatement ***for which the assessment of inherent risk is close to the upper end of the spectrum of inherent risk due to the degree to which the inherent risk factors affect the combination of the likelihood of a misstatement occurring and the magnitude of the potential misstatement should that misstatement occur that, in the auditor's judgment, requires special audit consideration.*** <sup>fn 13</sup> Areas of significant management judgment and significant unusual transactions may often be identified as significant risks. Significant risks are therefore often areas that require significant auditor attention.

<sup>fn 13</sup> See paragraph 13 of SAS No. 145, *Understanding the Entity and Its Environment and Assessing the Risks of Material Misstatement*.

[Subsequent footnotes renumbered.]

[No further amendment to AU-C section 701.]

**Amendment to SAS No. 136, *Forming an Opinion and Reporting on Financial Statements of Employee Benefit Plans Subject to ERISA*, as Amended (AICPA, *Professional Standards*, AU-C sec. 703)**

21. The amendment to AU-C section 703 is effective for audits of ERISA plan financial statements for periods ending on or after December 15, 2023.

**AU-C Section 703, *Forming an Opinion and Reporting on Financial Statements of Employee Benefit Plans Subject to ERISA***

[No amendment to paragraphs .01–.17.]

**Audit Risk Assessment and Response in an Audit of ERISA Plan Financial Statements**

~~.18 Section 315~~ **SAS No. 145, *Understanding the Entity and Its Environment and Assessing the Risks of Material Misstatement***, addresses the auditor’s responsibility to identify and assess the risks of material misstatement in the financial statements through understanding the entity and its environment, ***the applicable financial reporting framework, and including its internal control***. The plan instrument is essential to understanding the plan and identifying and performing audit procedures that are responsive to assessed risks. (Ref: par. .A18–.A21)

[No amendment to paragraph .19.]

**.20** When designing and performing audit procedures, the auditor should consider relevant plan provisions that affect the risk of material misstatement at the relevant assertion level for ***significant*** classes of transactions, account balances, and disclosures. (Ref: par. .A25–.A28)

[No amendment to paragraphs .21–.A18.]

**Audit Risk Assessment and Response in an Audit of ERISA Plan Financial Statements**

...

**.A19** Obtaining an understanding of the plan and its environment, ***the applicable financial reporting framework, and including its internal control***, is a continuous, dynamic process of gathering, updating, and analyzing information throughout the audit. The auditor’s understanding of the plan establishes a frame of reference for planning the audit and exercising professional judgment throughout the audit when the auditor does the following:

- Assesses the risks of material misstatement of the financial statements, including the related disclosures
- Determines materiality in accordance with section 320, *Materiality in Planning and Performing an Audit*
- Considers the appropriateness of the selection and application of accounting policies and the adequacy of financial statement disclosures
- Identifies areas for which special audit consideration may be necessary
- Develops expectations for use when performing analytical procedures



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- Responds to the assessed risks of material misstatement, including designing and performing further audit procedures to obtain sufficient appropriate audit evidence
- Evaluates the sufficiency and appropriateness of audit evidence obtained <sup>fn 22</sup>

<sup>fn 22</sup> [Footnote text omitted for purposes of this SAS.]

**.A20** ~~Section 315~~ **SAS No. 145** requires the auditor to perform risk assessment procedures to provide a basis for the identification and assessment of risks of material misstatement at the financial statement and ~~relevant~~ assertion levels. <sup>fn 23</sup> The consideration of risks of material misstatement at the relevant assertion level for **significant** classes of transactions, account balances, and disclosures directly assists in determining the nature, timing, and extent of further audit procedures at the assertion level necessary to obtain sufficient appropriate audit evidence.

<sup>fn 23</sup> [Footnote text omitted for purposes of this SAS.]

[No amendment to paragraphs .A21–.A152.]

**Appendix A — Examples of Plan Provisions by Audit Area (Not All-Inclusive)**

**.A153**

Paragraph .20 of this section requires the auditor to consider relevant plan provisions that affect the risk of material misstatement at the relevant assertion level for **significant** classes of transactions, account balances, and disclosures when designing and performing audit procedures. The relevant plan provisions will vary for each type of plan and the circumstances of each engagement. When designing audit procedures, the testing of relevant plan provisions may be coordinated among the various audit areas to which they relate.

...

[No further amendment to appendix A. No further amendment to AU-C section 703.]

**Amendment to SAS No. 137, *The Auditor’s Responsibilities Relating to Other Information Included in Annual Reports*, as Amended (AICPA, *Professional Standards*, AU-C sec. 720)**

22. The amendment to AU-C section 720 is effective for audits of financial statements for periods ending on or after December 15, 2023.

**AU-C Section 720, *The Auditor’s Responsibilities Relating to Other Information Included in Annual Reports***

[No amendment to paragraphs .01–.A33.]

#### Reading and Considering the Other Information

...

**.A34** The auditor’s knowledge obtained in the audit includes the auditor’s understanding of the entity and its environment, *the applicable financial reporting framework, and including the entity’s system of internal control*, obtained in accordance with ~~section 315~~ **SAS No. 145, Understanding the Entity and Its Environment and Assessing the Risks of Material Misstatement.**<sup>fn 9</sup> ~~Section 315~~ **SAS No. 145** sets out the auditor’s required understanding, which includes such matters as obtaining an understanding of the following:

**a. The entity’s organizational structure, ownership and governance, and its business model, including the extent to which the business model integrates the use of IT**

~~a.b.~~ The relevant industry, regulatory, and other external factors

~~b.~~ The nature of the entity

~~c.~~ The entity’s selection and application of accounting policies

~~d.~~ The entity’s objectives and strategies

~~e.c.~~ **The relevant measures used, internally and externally, to assess measurement and review of the entity’s financial performance**

~~f.d.~~ The entity’s internal control

<sup>fn 9</sup> [Footnote omitted for purposes of this SAS.]

[No amendment to paragraphs .A35–.A54.]

#### Responding When a Material Misstatement in the Financial Statements Exists or the Auditor’s Understanding of the Entity and Its Environment Needs to Be Updated

**.A55** In reading the other information, the auditor may become aware of new information that has implications for the following:

- The auditor’s understanding of the entity and its environment, *the financial reporting framework, and the entity’s system of internal control*, which may indicate the need to revise the auditor’s risk assessment<sup>fn 12</sup>
- The auditor’s responsibility to evaluate the effect of identified misstatements on the audit and of uncorrected misstatements, if any, on the financial statements<sup>fn 13</sup>
- The auditor’s responsibilities relating to subsequent events<sup>fn 14</sup>

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<sup>fn 12</sup> Paragraphs .11, .31, and .A1 of ~~section 315~~*SAS No. 145*.

<sup>fns 13–14</sup> [Footnotes omitted for purposes of this SAS.]

[No further amendment to AU-C section 720.]

**Amendment to SAS No. 142, *Audit Evidence* (AICPA, *Professional Standards*, AU-C sec. 500)**

23. The amendment to AU-C section 500 is effective for audits of financial statements for periods ending on or after December 15, 2023.

**AU-C Section 500, *Audit Evidence***

[No amendment to paragraphs .01–.A66.]

**Appendix A — Considerations Regarding the Use of External Information Sources**

**.A67**

[No amendment to paragraphs 1–7.]

8. The nature and extent of the auditor’s consideration takes into account the assessed risks of material misstatement at the assertion level to which the use of the external information is relevant, the degree to which the use of that information is relevant to the reasons for the assessed risks of material misstatement, and the possibility that the information from the external information source may not be reliable (for example, whether it is from a credible source). Based on the auditor’s consideration of the matters described in paragraph 5 of this appendix, the auditor may determine that

- a. further understanding of the entity and its environment, ***the applicable financial reporting framework, and including its entity’s system of*** internal control, is needed, in accordance with ~~section 315~~*SAS No. 145, Understanding the Entity and Its Environment and Assessing the Risks of Material Misstatement*, or
- b. further audit procedures, in accordance with section 330<sup>fn 2</sup> and section 540,<sup>fn 3</sup> when applicable, are appropriate in the circumstances, to respond to the assessed risks of material misstatement at the assertion level related to the use of information from an external information source. Such audit procedures may include the following:
  - i. Performing a comparison of information obtained from the external information source with information obtained from an alternative independent information source

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- ii. When relevant to considering management's use of an external information source, obtaining an understanding of controls management has in place to consider the reliability of the information from external information sources and potentially testing the operating effectiveness of such controls
- iii. Performing procedures to obtain information from the external information source to understand its processes, techniques, and assumptions, for the purposes of identifying, understanding, and when relevant, testing the operating effectiveness of its controls

<sup>fn 2-3</sup> [Footnotes omitted for purposes of this SAS.]

...

[No further amendment to appendix A. No further amendment to AU-C section 500.]

**Amendment to SAS No. 143, *Auditing Accounting Estimates and Related Disclosures* (AICPA, *Professional Standards*, AU-C sec. 540)**

24. The amendment to AU-C section 540 is effective for audits of financial statements for periods ending on or after December 15, 2023.

**AU-C Section 540, *Auditing Accounting Estimates and Related Disclosures***

[No amendment to paragraphs .01-.03.]

**Key Concepts of This Section**

**.04** ~~Section 315~~ *SAS No. 145* requires ***inherent risk and control risk to be assessed separately for identified risks of material misstatement*** ~~the auditor to assess the risk of material misstatement at the relevant assertion level. For this purpose, this section requires inherent risk and control risk to be assessed separately for accounting estimates.~~ ***In the context of this section and*** ~~depending on the nature of a particular accounting estimate, the susceptibility of an assertion to a misstatement that could be material may be subject to or affected by estimation uncertainty, complexity, subjectivity, or other inherent risk factors, and the interrelationship among them. As explained in section 200, *Overall Objectives of the Independent Auditor and the Conduct of an Audit in Accordance With Generally Accepted Auditing Standards*,<sup>fn 2</sup> inherent risk is ***influenced by inherent risk factors***, ~~higher for some assertions and related classes of transactions, account balances, and disclosures than for others.~~ Accordingly, the assessment of inherent risk depends on the degree to which the inherent risk factors affect the ***susceptibility of an assertion to misstatement of an***~~

**Commented [MM36]:** Modified to use consistent language/format throughout

~~assertion, and the level of inherent risk~~ likelihood or magnitude of misstatement and varies on a scale that is referred to in this section as *the spectrum of inherent risk*. In assessing control risk, the auditor takes into account whether the auditor's further audit procedures contemplate planned reliance on the operating effectiveness of controls. If the auditor does not ***intend to test and rely on the operating effectiveness of controls***, ~~perform tests of controls~~, the auditor's assessment of ***control risk is such that the assessment of the risk of material misstatement is the same as the assessment of inherent risk***. ~~the risk of material misstatement at the relevant assertion level cannot be reduced for the effective operation of controls with respect to the particular assertion.~~ (Ref: par. .A8-.A10, .A65-.A66, and app. A)

<sup>fn 2</sup> [Footnote omitted for purposes of this SAS.]

**.05** This section refers to relevant requirements in ~~AU-C sections 315~~ ***SAS No. 145*** and ***section 330*** and provides related guidance to emphasize the importance of the auditor's decisions about controls relating to accounting estimates, including decisions about whether

- there are controls ***required to be identified in accordance with SAS No. 145*** ~~relevant to the audit,~~<sup>fn 3</sup> for which the auditor is required to evaluate their design and determine whether they have been implemented.
- to test the operating effectiveness of ~~relevant~~ controls.

<sup>fn 3</sup> See paragraphs 27 and 29b of ***SAS No. 145, Understanding the Entity and Its Environment and Assessing the Risks of Material Misstatement***.

[Subsequent footnotes renumbered. No amendment to paragraph .06.]

**.07** The exercise of professional skepticism in relation to accounting estimates is affected by the auditor's consideration of inherent risk factors, and its importance increases when accounting estimates are subject to a greater degree of estimation uncertainty or are affected to a greater degree by complexity, subjectivity, or other inherent risk factors. Similarly, the exercise of professional skepticism is important when there is greater susceptibility to misstatement due to management bias or ***other fraud risk factors insofar as they affect inherent risk***. (Ref: par. .A11)

[No amendment to paragraphs .08-.11.]

#### **Risk Assessment Procedures and Related Activities**

**.12** When obtaining an understanding of the entity and its environment, ***the applicable financial reporting framework, and including*** the entity's ***system of*** internal control, as required by ~~section 315~~ ***SAS No. 145***, the auditor should obtain an understanding of the following matters related to the entity's accounting estimates. The auditor's procedures to obtain the understanding should be performed to the extent necessary to

*obtain audit evidence that* provides an appropriate basis for the identification and assessment of risks of material misstatement at the financial statement and ~~relevant~~ assertion levels. ~~from~~ <sup>from</sup> 5 (Ref: par. .A19–.A23)

**Obtaining an Understanding of the ~~The~~ Entity and Its Environment and the Applicable Financial Reporting Framework**

- a. The entity’s transactions and other events ~~or and~~ conditions that may give rise to the need for or changes in accounting estimates to be recognized or disclosed in the financial statements (Ref: par. .A24)
- b. The requirements of the applicable financial reporting framework related to accounting estimates (including the recognition criteria, measurement bases, and the related presentation and disclosure requirements) and how they apply in the context of the nature and circumstances of the entity and its environment, including how ~~transactions and other events or conditions are subject to or affected by~~ the inherent risk factors *affect susceptibility of assertions to misstatement of assertions*. (Ref: par. .A25–.A26)
- c. Regulatory factors relevant to the entity’s accounting estimates, including, when applicable, regulatory frameworks (Ref: par. .A27)
- d. The nature of the accounting estimates and related disclosures that the auditor expects to be included in the entity’s financial statements, based on the auditor’s understanding of the matters in paragraph .12a–c of this section (Ref: par. .A28)

**Obtaining an Understanding of the ~~The~~ Entity’s System of Internal Control**

- e. The nature and extent of oversight and governance that the entity has in place over management’s financial reporting process relevant to accounting estimates (Ref: par. .A29–.A31)
- f. How management identifies the need for and applies specialized skills or knowledge related to accounting estimates, including with respect to the use of a management’s specialist (Ref: par. .A32)
- g. How the entity’s risk assessment process identifies and addresses risks relating to accounting estimates (Ref: par. .A33–.A34)
- h. The entity’s information system as it relates to accounting estimates, including the following:
  - i. *How information relating to accounting estimates and related disclosures for significant classes of transactions, account balances, or disclosures flows through the entity’s information system*~~The classes of transactions, events, and conditions that are significant to the financial statements and that give rise to the need for or changes in accounting estimates and related disclosures~~ (Ref: par. .A20 and .A35)

- ii. For such accounting estimates and related disclosures, how management
  - (1) identifies the relevant methods, assumptions, or sources of data, and the need for changes in them, that are appropriate in the context of the applicable financial reporting framework, including how management (Ref: par. .A36–.A37)
    - (a) selects or designs, and applies, the methods used, including the use of models (Ref: par. .A38–.A39)
    - (b) selects the assumptions to be used, including consideration of alternatives, and identifies significant assumptions (Ref: par. .A40–.A43)
    - (c) selects the data to be used (Ref: par. .A44)
  - (2) understands the degree of estimation uncertainty, including by considering the range of possible measurement outcomes (Ref: par. .A45)
  - (3) addresses the estimation uncertainty, including selecting a point estimate and related disclosures for inclusion in the financial statements (Ref: par. .A46–.A49)

i. **Identified controls in the control activities component**<sup>fn 6</sup> ~~Control activities relevant to the audit~~ over management’s process for making accounting estimates as described in paragraph .12h(ii) of this section (Ref: par. .A50–.A54)

j. How management reviews the outcomes of previous accounting estimates and responds to the results of that review

<sup>fn 4/5</sup> [Footnote omitted for purposes of this SAS.]

<sup>fn 6</sup> **Paragraphs** *Error! Reference source not found. and 29b of SAS No. 145.*

[Subsequent footnotes further renumbered. No amendment to paragraphs .13–.14.]

### Identifying and Assessing the Risks of Material Misstatement

.15 In identifying and assessing the risks of material misstatement relating to an accounting estimate and related disclosures at the ~~relevant~~ assertion level, **including separately assessing inherent risk and control risk**, as required by ~~section 315~~ **SAS No. 145**,<sup>fn 5 7</sup> the auditor should ~~separately assess inherent risk and control risk. The auditor should~~ take the following into account in identifying the risks of material misstatement and assessing inherent risk: (Ref: par. .A64–.A71)

- a. The degree to which the accounting estimate is subject to estimation uncertainty (Ref: par. .A72–.A75)

- b. The degree to which one or both of the following are affected by complexity, subjectivity, or other inherent risk factors: (Ref: par. .A76–.A79)
  - i. The selection and application of the method, assumptions, and data in making the accounting estimate
  - ii. The selection of management’s point estimate and related disclosures for inclusion in the financial statements

<sup>fn 57</sup> Paragraphs ~~2631–2734~~ of section 315 *SAS No. 145*.

- .16** The auditor should determine whether any of the risks of material misstatement identified and assessed in accordance with paragraph .15 are, in the auditor’s **professional** judgment, a significant risk. <sup>fn 68</sup> If the auditor has determined that a significant risk exists, the auditor should **identify controls that address** ~~obtain an understanding of the entity’s controls, including control activities, relevant to that risk~~ <sup>fn 9</sup> and, ~~based on that understanding,~~ evaluate whether such controls have been suitably designed and implemented to mitigate such risks. <sup>fn 710</sup> (Ref: par. .A80)

<sup>fn 68</sup> Paragraph 3228 of AU-C section 315 *SAS No. 145*.

<sup>fn 9</sup> Paragraph 26a(i) of *SAS No. 145*.

<sup>fn 710</sup> Paragraph 26a.30 of AU-C section 315 *SAS No. 145*.

[Subsequent footnotes further renumbered. No amendment to paragraph .17.]

### Responses to the Assessed Risks of Material Misstatement

...

- .18** As required by section 330, <sup>fn 114</sup> the auditor should design and perform tests to obtain sufficient appropriate audit evidence about the operating effectiveness of ~~relevant~~ controls, if
- a. the auditor’s assessment of risks of material misstatement at the relevant assertion level includes an expectation that the controls are operating effectively, or
  - b. substantive procedures alone cannot provide sufficient appropriate audit evidence at the relevant assertion level.

In relation to accounting estimates, the auditor’s tests of such controls should be responsive to the reasons for the assessment given to the risks of material misstatement. In designing and performing tests of controls, the auditor should obtain more persuasive audit evidence the greater the reliance the auditor places on the effectiveness of a control. <sup>fn 1215</sup> (Ref: par. .A85–.A89)

<sup>fn 114–1215</sup> [Footnotes omitted for purposes of this SAS.]



[No amendment to paragraphs .19–.A7.]

## Key Concepts of This Section

### *Inherent Risk Factors*

**.A8** *Inherent risk factors* are characteristics of ~~conditions and~~ events *or conditions* that may affect the susceptibility of an assertion to misstatement, *whether due to fraud or error, of an assertion about a class of transactions, account balance, or disclosure*, before consideration of controls.<sup>fn 27</sup> Appendix A, “Inherent Risk Factors,” further explains the nature of these inherent risk factors, and their interrelationships, in the context of making accounting estimates and their presentation in the financial statements.

<sup>fn 27</sup> Paragraph 12 of SAS No. 145.

**.A9** ~~In addition to the inherent risk factors of estimation uncertainty, complexity, or subjectivity, other inherent risk factors that the auditor may consider in identifying and~~ *When assessing the risks of material misstatement at the assertion level<sup>fn 28</sup> in addition to estimation uncertainty, complexity, and subjectivity, the auditor also takes into account the degree* ~~may include the extent to which~~ *other inherent risk factors included in SAS No. 145 affect susceptibility of assertions to misstatement about the accounting estimate. Such additional inherent risk factors include the following:* ~~is subject to or affected by~~

- ~~a~~ *A change in the nature or circumstances of the relevant financial statement items, or requirements of the applicable financial reporting framework, which may give rise to the need for changes in the method, assumptions, or data used to make the accounting estimate.*
- ~~s~~ *Susceptibility to misstatement due to management bias or other fraud risk factors insofar as they affect inherent risk, in making the accounting estimate.*
- *Uncertainty, other than estimation uncertainty*

<sup>fn 28</sup> Paragraph 31 of SAS No. 145.

[Subsequent footnotes further renumbered.]

### *Control Risk*

**.A10** ~~An important consideration for the auditor in~~ *In* assessing control risk at the relevant assertion level *in accordance with SAS No. 145, the auditor takes into account* ~~is the effectiveness of the design of the controls that~~ *whether the auditor intends plans to rely on test the operating effectiveness of controls, and the extent to which the controls address the assessed inherent risks at the relevant assertion level. When the auditor is considering whether to test the operating effectiveness of controls, the* ~~The auditor’s evaluation that controls are effectively designed and have been implemented supports an expectation, by the auditor, about the operating effectiveness of the controls in determining whether~~ *establishing the plan to test them.*

[No amendment to paragraphs .A11–.A18.]

#### **Risk Assessment Procedures and Related Activities**

##### ***Obtaining an Understanding of the Entity and Its Environment, the Applicable Financial Reporting Framework, and the Entity’s System of Internal Control***

**.A19** ~~Section 315~~ **SAS No. 145**<sup>fn 2429</sup> requires the auditor to obtain an understanding of certain matters about the entity and its environment, ***the applicable financial reporting framework, and including the entity’s system of internal control.*** The requirements in paragraph .12 of this section relate more specifically to accounting estimates and build on the broader requirements in ~~section 315~~ **SAS No. 145.**

<sup>fn 2429</sup> [Footnote omitted for purposes of this SAS.]

**.A20** The classes of transactions, events, and conditions within the scope of paragraph .12<sup>h</sup> of this section are the same as the classes of transactions, events, and conditions relating to accounting estimates and related disclosures that are subject to ~~section 315~~ **SAS No. 145.**  
<sup>fn 2530</sup> In obtaining the understanding of the entity’s information system as it relates to accounting estimates, the auditor may consider

- whether the accounting estimates arise from the recording of routine and recurring transactions or whether they arise from nonrecurring or unusual transactions.
- how the information system addresses the completeness of accounting estimates and related disclosures, in particular, for accounting estimates related to liabilities.

<sup>fn 2530</sup> [Footnote omitted for purposes of this SAS.]

#### *Scalability*

**.A21** The nature, timing, and extent of the auditor’s procedures to obtain the understanding of the entity and its environment, ~~including the applicable financial reporting framework, and~~ the entity’s ***system of internal control,*** related to the entity’s accounting estimates, may depend, to a greater or lesser degree, on the extent to which the individual matters apply in the circumstances. For example, the entity may have few transactions or other events ~~or and~~ conditions that give rise to the need for accounting estimates; the applicable financial reporting requirements may be simple to apply; and there may be no relevant regulatory factors. Further, the accounting estimates may not require significant judgments, and the process for making the accounting estimates may be less complex. In these circumstances, the accounting estimates may be subject to or affected by estimation uncertainty, complexity, subjectivity, or other inherent risk factors to a lesser degree, and there may be fewer ***identified controls in the control activities component.*** ~~relevant to the audit.~~ If so, the auditor’s risk assessment procedures are likely to be less extensive and may be performed primarily through inquiries of management with appropriate responsibilities for the financial statements, ~~such as and~~ observation of management’s process for making the accounting estimate ***(including when evaluating whether identified controls in that process are designed***

*effectively and when determining whether the control has been implemented).*

[No amendment to paragraphs .A22–.A23.]

*The Entity and Its Environment*

**.A24** *The entity's transactions and other events ~~and~~ or conditions (Ref: par. .12a).*

Changes in circumstances that may give rise to the need for or changes in accounting estimates may include, for example, whether

- the entity has engaged in new types of transactions,
- terms of transactions have changed, or
- new events or conditions have occurred.

**.A25** *The requirements of the applicable financial reporting framework (Ref: par. .12b).*

Obtaining an understanding of the requirements of the applicable financial reporting framework provides the auditor with a basis for discussion with management and, where applicable, those charged with governance about how management has applied ~~the~~ **these requirements of the applicable financial reporting framework** relevant to the accounting estimates, and about the auditor's determination of whether they have been applied appropriately. This understanding also may assist the auditor in communicating with those charged with governance when the auditor considers a significant accounting practice that is acceptable under the applicable financial reporting framework to not be the most appropriate in the circumstances of the entity. <sup>fn 2631</sup>

<sup>fn 2631</sup> [Footnote omitted for purposes of this SAS.]

[No amendment to paragraphs .A26–.A28.]

*The Entity's **System of Internal Control** ~~Relevant to the Audit~~*

**.A29** *The nature and extent of oversight and governance (Ref: par. .12e).* In applying ~~section 315-SAS No. 145,~~ <sup>fn 2732</sup> the auditor's understanding of the nature and extent of oversight and governance that the entity has in place over management's process for making accounting estimates may be important to the auditor's required evaluation ~~about as it relates to~~ whether

- management, with the oversight of those charged with governance, has created and maintained a culture of honesty and ethical behavior, and
- the ~~strengths in the control environment elements collectively provide~~ **provides** an appropriate foundation for the other components of **the system of** internal control **considering the nature and size of the entity,** and
- ~~whether those other components are undermined by~~ **control deficiencies identified** in the control environment **undermine the other components of the system of internal control.**

<sup>2732</sup> Paragraph 21a15 of AU-C section 315 ~~SAS No. 145.~~

[No amendment to paragraphs .A30–.A34.]

**.A35** *The entity's information system relating to accounting estimates (Ref: par. .12h(i)).*  
During the audit, the auditor may identify classes of transactions, events, ~~or and~~ conditions that give rise to the need for accounting estimates and related disclosures that management failed to identify. ~~AU-C section 315~~ **SAS No. 145** addresses circumstances in which the auditor identifies risks of material misstatement that management failed to identify, including **considering the implications for the auditor's evaluation of** ~~determining whether there is a significant deficiency or material weakness in internal control with regard to~~ the entity's risk assessment process. <sup>fn 3035</sup>

<sup>fn 3035</sup> [Footnote omitted for purposes of this SAS.]

[No amendment to paragraphs .A36–.A38.]

**.A39** *Models.* Management may design and implement specific controls around models used for making accounting estimates, whether it's management's own model or an external model. When the model itself has an increased level of complexity or subjectivity, such as an expected credit loss model or a fair value model using level 3 inputs, controls that address **the risks of material misstatement related to** such complexity or subjectivity may be more likely to be identified ~~as relevant to the audit in accordance with SAS No. 145.~~ <sup>fn 36</sup> When complexity in relation to models is present, controls over data integrity are also more likely to be **identified controls in accordance with SAS No. 145** ~~relevant to the audit.~~ Factors that may be appropriate for the auditor to consider in obtaining an understanding of the model and **related identified controls** ~~control activities relevant to the audit~~ include the following:

- How management determines the relevance and accuracy of the model.
  - The validation or back-testing of the model, including whether the model is validated prior to use and revalidated at regular intervals to determine whether it remains suitable for its intended use. The entity's validation of the model may include evaluation of
    - the model's theoretical soundness,
    - the model's mathematical integrity, and
    - the accuracy and completeness of the data and the appropriateness of data and assumptions used in the model.
- How the model is appropriately changed or adjusted on a timely basis for changes in market or other conditions and whether there are appropriate change control policies over the model.
- Whether adjustments, also referred to as *overlays* in certain industries, are made to the output of the model and whether such adjustments are appropriate in the circumstances in accordance with the requirements of the applicable financial

reporting framework. When the adjustments are not appropriate, such adjustments may be indicators of possible management bias.

- Whether the model is adequately documented, including its intended applications, limitations, key parameters, required data and assumptions, and the results of any validation performed on it and the nature of and basis for any adjustments made to its output.

Examples of valuation models may include the present value of expected future cash flows, option-pricing models, matrix pricing, option-adjusted spread models, and fundamental analysis.

*fn 36* Paragraph 27 and 29b of SAS No. 145.

[Subsequent footnotes further renumbered. No amendment to paragraphs .A40–.A43.]

**.A44** *Data* (Ref: par. .12h(ii)(1)(c)). Matters that the auditor may consider in obtaining an understanding of how management selects the data on which the accounting estimates are based include the following:

- The nature and source of the data, including information obtained from an external information source
- How management evaluates whether the data is appropriate
- The accuracy and completeness of the data
- The consistency of the data used with data used in previous periods
- The complexity of the IT **applications or other aspects of the entity's IT environment systems** used to obtain and process the data, including when this involves handling large volumes of data
- How the data is obtained, transmitted, and processed and how its integrity is maintained

[No amendment to paragraphs .A45–.A49.]

**.A50 Identified controls** ~~Control activities relevant to the audit over management's process for making accounting estimates~~ (Ref: par. .12i). The auditor's judgment in identifying controls ~~relevant to the audit~~ **in the control activities component** and, therefore, the need to evaluate the design of those controls and determine whether they have been implemented, relates to management's process described in paragraph .12h(ii). The auditor may not identify **controls** ~~relevant control activities~~ in relation to all the elements **aspects** of paragraph .12h(ii), ~~depending on the complexity associated with the accounting estimate.~~

**.A51** As part of obtaining an understanding of **identifying controls, and evaluating their design and determining whether the identified controls they have been implemented,** *fn 39* — ~~the control activities relevant to the audit,~~ the auditor may consider the following:

- How management determines the appropriateness of the data used to develop the accounting estimates, including when management uses an external information source or data from outside the general and subsidiary ledgers.
- The review and approval of accounting estimates, including the assumptions or data used in their development, by appropriate levels of management and, where appropriate, those charged with governance.
- The segregation of duties between those responsible for making the accounting estimates and those committing the entity to the related transactions, including whether the assignment of responsibilities appropriately takes account of the nature of the entity and its products or services. For example, in the case of a large financial institution, relevant segregation of duties may consist of an independent function responsible for estimation and validation of fair value pricing of the entity's financial products staffed by individuals whose remuneration is not tied to such products.
- The effectiveness of the design of the ~~controls-control activities~~. Generally, it may be more difficult for management to design controls that address subjectivity and estimation uncertainty in a manner that effectively prevents, or detects and corrects, material misstatements than it is to design controls that address complexity. Controls that address subjectivity and estimation uncertainty may need to include more manual elements, which may be less reliable than automated controls as they can be more easily bypassed, ignored, or overridden by management. The design effectiveness of controls addressing complexity may vary depending on the reason for and the nature of the complexity. For example, it may be easier to design more effective controls related to a method that is routinely used or over the integrity of data.

<sup>fn 39</sup> Paragraph 30 of SAS No. 145.

[Subsequent footnotes further renumbered.]

.A52 When management makes extensive use of IT in making an accounting estimate, **identified** controls ~~relevant to the audit~~ **in the control activities component** are likely to include general IT controls and ~~application~~ **information-processing** controls. Such controls may address risks related to the following:

- Whether the IT **application or other aspects of the IT environment** ~~system has~~ **have** the capability and ~~is~~ **are** appropriately configured to process large volumes of data.
- Complex calculations in applying a method. When diverse **IT applications** ~~systems~~ are required to process complex transactions, regular reconciliations between the **IT applications** ~~systems~~ are made, in particular, when the **IT applications** ~~systems~~ do not have automated interfaces or may be subject to manual intervention.
- Whether the design and calibration of models is periodically evaluated.
- The complete and accurate extraction of data regarding accounting estimates from the entity's records or from external information sources.

- Data, including the complete and accurate flow of data through the entity's information system, the appropriateness of any modification to the data used in making accounting estimates, and the maintenance of the integrity and security of the data; ~~When~~ using external information sources, risks related to processing or recording the data.
- Whether management has controls around access, change, and maintenance of individual models to maintain a strong audit trail of the accredited versions of models and to prevent unauthorized access or amendments to those models.
- Whether there are appropriate controls over the transfer of information relating to accounting estimates into the general ledger, including appropriate controls over journal entries.

**.A53** In some entities, the term *governance* may be used to describe activities within the control environment, *the entity's process to monitor the system of internal control monitoring of controls*, and other components of *the system of* internal control, as described in AU-C section 315 **SAS No. 145**.<sup>fn 3340</sup>

<sup>fn 3340</sup> [Footnote omitted for purposes of this SAS.]

**.A54** For entities with an internal audit function, its work may be particularly helpful to the auditor in obtaining an understanding of the following:

- The nature and extent of management's use of accounting estimates
- The design and implementation of *controls control activities* that address the risks related to the data, assumptions, and models used to make the accounting estimates
- The aspects of the entity's information system that generate the data on which the accounting estimates are based
- How new risks relating to accounting estimates are identified, assessed, and managed

[No amendment to paragraphs .A55–.A63.]

### Identifying and Assessing the Risks of Material Misstatement

**.A64** Identifying and assessing risks of material misstatement at the ~~relevant~~ assertion level relating to accounting estimates includes not only accounting estimates that are recognized in the financial statements but also those that are included in the notes to the financial statements.

**Commented [LCD37]:** New change from last version to strikethrough "relevant"

[Paragraph .A67, .A69, and .A71 included for contextual purposes only.]

**.A65** ~~Section 200<sup>38</sup> states that GAAS do not ordinarily refer to inherent risk and control risk separately. However, this section~~ **SAS No. 145** requires a separate assessment of inherent risk and control risk to provide a basis for designing and performing further audit procedures to respond to the risks of material misstatement *at the assertion level*,<sup>fn 46</sup> including significant risks, ~~at the relevant assertion level for accounting estimates~~

in accordance with section 330.<sup>fn-39</sup> See paragraphs .A148–.A149 of this section for discussion about documentation of inherent risk factors.

<sup>fn-38</sup> Paragraph .A44 of section 200.

<sup>fn-39</sup> <sup>46</sup> Paragraph .07b of AU-C section 330, *Paragraphs 31 and 34 of SAS No. 145*.

[Subsequent footnotes further renumbered.]

**.A66.** As discussed in paragraph .04 of this section, section 200<sup>fn 4047</sup> explains that inherent risk is ***influenced by inherent risk factors***. ~~higher for some assertions and related classes of transactions, account balances, and disclosures than for others.~~ In identifying the risks of material misstatement and in assessing inherent risk ***for accounting estimates in accordance with SAS No. 145***, the auditor is required to take into account ***the inherent risk factors that affect the susceptibility of assertions to misstatement of assertions and how they do so***. ~~the degree to which the accounting estimate is subject to or affected by estimation uncertainty, complexity, subjectivity, or other inherent risk factors.~~ The auditor's consideration of the inherent risk factors may also provide information to be used in determining the following:

- ***Assessing the likelihood and magnitude of misstatement (such as, where*** ~~Where~~ ***inherent risk is assessed on the spectrum of inherent risk)***
- ***Determining the*** ~~The~~ ***reasons for the assessment given to the risks of material misstatement at the relevant assertion level, and that the auditor's further audit procedures in accordance with paragraph .18 of this section are responsive to those reasons***

The interrelationships between the inherent risk factors are further explained in appendix A.

<sup>fn 4047</sup> [Footnote omitted for purposes of this SAS.]

**.A67** The reasons for the auditor's assessment of inherent risk at the relevant assertion level may result from one or more of the inherent risk factors of estimation uncertainty, complexity, subjectivity, or other inherent risk factors. Examples follow:

- Accounting estimates of expected credit losses are likely to be complex because the expected credit losses cannot be directly observed and may require the use of a complex model. The model may use a complex set of historical data and assumptions about future developments in a variety of entity-specific scenarios that may be difficult to predict. Accounting estimates for expected credit losses are also likely to be subject to high estimation uncertainty and significant subjectivity in making judgments about future events or conditions. Similar considerations apply to insurance contract liabilities.
- An accounting estimate for an obsolescence provision for an entity with a wide range of different inventory types may require complex systems and processes but



may involve little subjectivity, and the degree of estimation uncertainty may be low, depending on the nature of the inventory.

- Other accounting estimates may not be complex to make but may have high estimation uncertainty and require significant judgment, for example, an accounting estimate that requires a single critical judgment about a liability, the amount of which is contingent on the outcome of the litigation.

.A68 The relevance and significance of inherent risk factors may vary from one estimate to another. Accordingly, the inherent risk factors may, either individually or in combination, affect simple accounting estimates to a lesser degree, and the auditor may identify fewer risks or assess inherent risk *close to* ~~at~~ the lower end of the spectrum of inherent risk.

.A69 Conversely, the inherent risk factors may, either individually or in combination, affect complex accounting estimates to a greater degree and may lead the auditor to assess inherent risk at the higher end of the spectrum of inherent risk. For these accounting estimates, the auditor's consideration of the effects of the inherent risk factors is likely to directly affect the number and nature of identified risks of material misstatement, the assessment of such risks, and ultimately, the persuasiveness of the audit evidence needed in responding to the assessed risks. Also, for these accounting estimates, the auditor's application of professional skepticism may be particularly important.

.A70 Events occurring after the date of the financial statements may provide additional information relevant to the auditor's assessment of the risks of material misstatement at the relevant assertion level. For example, the outcome of an accounting estimate may become known during the audit. In such cases, the auditor may assess or revise the assessment of the risks of material misstatement at the relevant assertion level, <sup>fn 44/48</sup> regardless of *how the inherent risk factors affect susceptibility of assertions to misstatement relating to* ~~degree to which~~ the accounting estimate. ~~was subject to or affected by estimation uncertainty, complexity, subjectivity, or other inherent risk factors.~~ Events occurring after the date of the financial statements also may influence the auditor's selection of the approach to testing the accounting estimate in accordance with paragraph .18. For example, for a simple bonus accrual that is based on a straightforward percentage of compensation for selected employees, the auditor may conclude that there is relatively little complexity or subjectivity in making the accounting estimate and, therefore, may assess inherent risk at the relevant assertion level *close to* ~~at~~ the lower end of the spectrum of inherent risk. The payment of the bonuses subsequent to period-end may provide sufficient appropriate audit evidence regarding the assessed risks of material misstatement at the relevant assertion level.

<sup>fn 44/48</sup> Paragraph .37.32 of AU-C section 315 *SAS No. 145*.

.A71 The auditor's assessment of control risk may be done in different ways depending on preferred audit techniques or methodologies. The control risk assessment may be expressed using qualitative categories (for example, control risk assessed as maximum, moderate, or minimum) or in terms of the auditor's expectation of how effective the

controls are in addressing the identified risk, that is, the planned reliance on the effective operation of controls. For example, if control risk is assessed as maximum, the auditor contemplates no reliance on the effective operation of controls. If control risk is assessed at less than maximum, the auditor contemplates reliance on the effective operation of controls.

[No amendment to paragraphs .A72–.A78.]

***Other Inherent Risk Factors***

**.A79** The degree of subjectivity associated with an accounting estimate influences the susceptibility of the accounting estimate to misstatement due to management bias or ~~fraud~~ ***other fraud risk factors insofar as they affect inherent risk***. For example, when an accounting estimate is subject to a high degree of subjectivity, the accounting estimate is likely to be more susceptible to misstatement due to management bias or fraud, and this may result in a wide range of possible measurement outcomes. Management may select a point estimate from that range that is inappropriate in the circumstances, or that is inappropriately influenced by unintentional or intentional management bias, and that is, therefore, misstated. For continuing audits, indicators of possible management bias identified during the audit of preceding periods may influence the planning and risk assessment procedures in the current period.

[No amendment to paragraphs .A80–.A84.]

***When the Auditor Intends to Rely on the Operating Effectiveness of ~~Relevant~~ Controls***

**.A85** Testing the operating effectiveness of ~~relevant~~ controls may be appropriate when inherent risk is assessed as higher on the spectrum of inherent risk, including for significant risks. This may be the case when the accounting estimate is subject to or affected by a high degree of complexity. When the accounting estimate is affected by a high degree of subjectivity and, therefore, requires significant judgment by management, inherent limitations in the effectiveness of the design of controls may lead the auditor to focus more on substantive procedures than on testing the operating effectiveness of controls.

[No further amendment to AU-C section 540.]