



Agenda Item 2B

Proposed AT-C Section 210, Limited Assurance <u>Review</u> Engagements	
Introduction, Objectives, Definitions, and Requirements	Application and Other Explanatory Material
<p>Introduction</p> <p>.01 This section contains performance and reporting requirements and application guidance for limited—assurance engagements <u>reviews performed in accordance with the attestation standards</u>. The requirements and guidance in this section supplement the requirements and guidance in AT-C section 105, <i>Concepts Common to All Attestation Engagements</i>.*</p>	
<p>Effective Date</p> <p>.02 This section is effective for practitioners' limited assurance review reports dated on or after May 1, 2020 <u>July 15, 2021</u>.[†] Early implementation is not permitted.</p>	
<p>Objectives</p> <p>.03 In conducting a limited—assurance review engagement, the objectives of the practitioner are to do the following:</p>	

Commented [MG1]: Confirm with ASB that early implementation will not be permitted.

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

† ~~This proposed effective date is provisional but will not be earlier than May 1, 2020.~~

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<p>a. Obtain limited assurance about whether any material modifications should be made to the subject matter in order for it to be in accordance with (or based on) the criteria</p> <p>b. Express a conclusion in a written report in a form that conveys whether, based on the procedures performed and the evidence obtained, the practitioner is aware of any material modifications that should be made to</p> <p style="padding-left: 40px;">i. the subject matter in order for it to be in accordance with (or based on) the criteria or</p> <p style="padding-left: 40px;">ii. the responsible party's assertion in order for it to be fairly stated</p> <p>c. Communicate further as required by relevant AT-C sections</p>	
Definitions	
<p>.04 For purposes of this section, the following terms have the meaning attributed as follows:</p> <p>Modified conclusion. A qualified or an adverse conclusion.</p> <p>Appropriateness of limited assurancereview evidence. The measure of the quality of limited assurancereview evidence, that is, its relevancy and reliability in providing support for the practitioner's conclusion.</p> <p>Modified conclusion. A qualified conclusion.</p> <p>Limited assuranceReview evidence. Information used by the practitioner in obtaining limited assurance on which the practitioner's conclusion is based.</p>	

Commented [MG2]: The corresponding objective in 205 is "Obtain reasonable assurance about whether the subject matter as measured or evaluated against the criteria is free from material misstatement."

Commented [MG3]: Consistent with language in paragraph .A54 of 205. However, that paragraph contains additional guidance.

Commented [MG4]: Moved so list is appropriately in alphabetical order.

Pursuant to directive at January 2019 ASB meeting, revision to permit adverse conclusion is deleted from the proposed standard.

The ARSC will include a question in its exposure draft asking respondents whether 210 should be consistent with AR-C section 90 (the ARSC is proposing a revision to AR-C section 90 that would permit an adverse conclusion).

ASB directed that AT-C section 210 be consistent with SSARSS.

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<p>Sufficiency of limited assurancereview evidence. The measure of the quantity of limited assurancereview evidence. The quantity of the limited assurancereview evidence needed is affected by the risks of material misstatement and also by the quality of such evidence.</p>	
Requirements	
Conduct of a Limited AssuranceReview Engagement	Conduct of a Limited AssuranceReview Engagement (Ref: par. .05)
<p>.05 In performing a limited assurance engagementreview engagement, the practitioner should comply with this section, AT-C section 105, and any subject matter AT-C section that is relevant to the engagement. A subject matter AT-C section is relevant to the engagement when it is in effect and the circumstances addressed by the AT-C section exist. (Ref: par. .A1)</p>	<p>.A1 For example, if a practitioner was performing a limited assurance engagementreview on pro forma financial information, AT-C section 105, this section, and AT-C section 310, <i>Reporting on Pro Forma Financial Information</i>, would be relevant.</p>
<p>.06 The practitioner should consider whether the nature of the procedures to be performed would enable the practitioner to obtain sufficient appropriate limited assurancereview evidence to obtain limited assurance.</p>	
<p>.07 A practitioner should not perform a limited assurance engagementreview of</p> <ul style="list-style-type: none"> a. prospective financial information, b. internal control, or c. compliance with requirements of specified laws, regulations, rules, contracts, or grants. 	
Agreeing on the Terms of the Engagement	Agreeing on the Terms of the Engagement (Ref: par. .08-.09-10 and .4647)
<p>.08 The practitioner should agree upon the terms of the engagement with the engaging party. The agreed-upon terms of the engagement</p>	<p>.A2 It is in the interests of both the engaging party and the practitioner to document the agreed-upon terms of the engagement before the commencement of the engagement to help avoid misunderstandings.</p>

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should be specified in sufficient detail in an engagement letter or other suitable form of written agreement. (Ref: par. .A2)	The form and content of the engagement letter or other suitable form of written agreement will vary with the engagement circumstances.
<p>.09 The agreed-upon terms of the engagement should include the following:</p> <ul style="list-style-type: none"> a. The objective and scope of the engagement b. The responsibilities of the practitioner (Ref: par. .A3) c. A statement that the engagement will be conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants d. The responsibilities of the appropriate responsible party <u>and the responsibilities of the engaging party, if different, including</u> (Ref: par. .A4 <u>.A5</u>) <ul style="list-style-type: none"> i. that the responsible party is responsible <u>for the subject matter in accordance with (or based on) the criteria or, if only the practitioner has measured or evaluated the</u> 	<p>.A3 A practitioner may further describe the responsibilities of the practitioner by adding the following items to the engagement letter or other suitable form of written agreement:</p> <ul style="list-style-type: none"> a. A statement that the engagement <u>review</u> is designed to obtain limited assurance about whether any material modifications should be made to the subject matter in order for it to be in accordance with (or based on) the criteria b. A statement that the objective of a limited assurance engagement <u>review</u> is the expression of a conclusion in a written practitioner's report about whether the practitioner is aware of any material modifications that should be made to the subject matter in order for it to be in accordance with (or based on) the criteria or the responsible party's assertion in order for it to be fairly stated <p>.A4 <u>.A5</u> As indicated in AT-C section 105, the term <i>appropriate party</i> refers to the responsible party, the engaging party, or both, as appropriate.[†] The term is used to accommodate situations in which the responsible party is not the engaging party. For example, when the responsible party is not the engaging party, the engaging party, rather than the responsible party, may be responsible for identifying the criteria.</p> <p>.A5 <u>.A4</u> A practitioner may also be engaged to assist the responsible party in measuring or evaluating the subject matter against the criteria.</p>

Commented [MG8]: This is not deleted in 205. However, subparagraph d no longer refers to *appropriate party*.

[†]Paragraph .11 of AT-C section 105, *Concepts Common to All Attestation Engagements*.

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<p>subject matter against the criteria, takes responsibility for the subject matter and (Ref: par. .A5A4-.A7A6)</p> <p>ii. that the appropriate-responsible party (or the engaging party, if applicable) is responsible for (Ref: par. .A8)</p> <p>(1) identifying the criteria for the measurement, evaluation, or disclosure of the subject matter and (Ref: par. .A7)</p> <p>(2) determining that such criteria are suitable and will be available to the intended users</p> <p>e. A statement that the procedures performed in a limited assurance engagement review vary in nature and timing from, and are substantially less in extent than, an examination and, consequently, the level of assurance obtained in a limited assurance engagement review is substantially lower than the assurance that would have been obtained had an examination been performed (Ref: par. .A9A8)</p> <p>f. Identification of the criteria for the measurement, evaluation, or disclosure of the subject matter (Ref: par. .A10A9)</p>	<p>.A6-A5 Regardless of the procedures performed by the practitioner when assisting the responsible party in measuring or evaluating the subject matter, the responsible party is required to accept responsibility for the subject matter in accordance with (or based on) the criteria or, if only the practitioner has measured or evaluated the subject matter, take responsibility for the subject matter.</p> <p>.A7-A6 If the practitioner is reporting on the responsible party's assertion, the responsible party may not base its assertion solely on the practitioner's procedures.</p> <p>.A8-A7 The engaging party may request that the practitioner recommend, develop, or assist in developing the criteria for the engagement. The engaging party is deemed to have identified the criteria if the engaging party agrees to the criteria that the practitioner recommended or assisted in developing.</p> <p>.A9-A8 If relevant, a statement about the inherent limitations of a limited assurance engagement review engagement may indicate that "because of the inherent limitations of a limited assurance engagement review engagement, together with the inherent limitations of internal control, an unavoidable risk exists that some material misstatements may not be detected, even though the limited assurance engagement review is properly planned and performed in accordance with the attestation standards."</p> <p>.A10-A9 If relevant, the practitioner may include in the engagement letter the responsible party's acknowledgment that it intends to measure or evaluate the subject matter against the criteria and provide the practitioner with a written assertion. An written-assertion may be needed, for example, <u>to do the following:</u></p>

Commented [MG5]: Consistent with 205.

Commented [MG9]: Consistent with 205.

Commented [MG6]: Change made pursuant to BDO comment (change is consistent with language in AR-C section 90).

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<p><u>h.</u> An acknowledgment that the engaging party agrees to provide the practitioner with a representation letter at the conclusion of the engagement []</p>	<ul style="list-style-type: none"> • to comply with the terms of the engagement, for example, an engagement in which management has engaged the practitioner to report on management’s assertion; • to comply with the requirements of a law, regulation, or contract; or • to comply with the requirements of an AT-C section. <p>For engagements in which an assertion is obtained (for example, the assertion is required by law, regulation, or contract, or where the practitioner is reporting on management’s assertion) or otherwise deemed necessary, the practitioner may include in the engagement letter the responsible party’s acknowledgment that it will provide the practitioner with a written assertion.</p>
<p><u>.10</u> For review engagements in which an assertion is obtained or otherwise deemed necessary, the practitioner should include in the engagement letter the responsible party’s acknowledgment that it will provide the practitioner with a written assertion that covers the entire relevant period or periods. (Ref: par. A10-.A11)</p>	<p><u>.A10</u> Examples of when an assertion is obtained or otherwise deemed necessary are when an assertion is required by law, regulation, or contract, or when the practitioner is engaged to report on management’s assertion.</p> <p><u>.A11</u> Situations may arise in which the current responsible party was not present during some or all of the period covered by the practitioner’s report. Such persons may contend that they are not in a position to provide a written assertion that covers the entire period because they were not in place during some or all of the period. This fact, however, does not diminish such persons’ responsibilities for the subject matter as a whole. Accordingly, the requirement for the responsible party to acknowledge its responsibility to provide, and to subsequently provide, a written assertion that covers the entire relevant period or periods still applies.</p>

Commented [MG7]: This is not in 205.

Commented [MG10]: Moved proposed application guidance to a requirement and added back application guidance from extant pursuant to GT comment letter.

This is different than how it is presented in 205 – which has the requirement as subparagraph h to the preceding requirement paragraph.

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<p>.10-11 Although an engagement may recur, each engagement is considered a separate engagement. The practitioner should assess whether circumstances require revision to the terms of a preceding engagement. If the practitioner concludes that the terms of the preceding engagement need not be revised for the current engagement, the practitioner should remind the engaging party of the terms of the current engagement, and the reminder should be documented.</p>	
<p>Planning and Performing the Engagement</p>	<p>Planning and Performing the Engagement (Ref: par. .112-.123)</p>
<p>.11-12 The practitioner should establish an overall engagement strategy that sets the scope, timing, and direction of the engagement and determine the nature, timing, and extent of the planned procedures that are required to be carried out to achieve the objectives of the engagement. The nature, timing, and extent of the practitioner's procedures may be affected by the extent to which the responsible party has measured or evaluated the subject matter against the criteria. The practitioner should exercise professional judgment in selecting and applying procedures to accumulate sufficient appropriate evidence that provides a reasonable basis for the practitioner's conclusion. (Ref: par. .A11A12-.A14A15)</p>	<p>.A11-A12 Planning involves the engagement partner and other key members of the engagement team and may involve the practitioner's specialists. Adequate planning helps the practitioner devote appropriate attention to important areas of the engagement, identify potential problems on a timely basis, and properly organize and manage the engagement for it to be performed in an effective and efficient manner. Adequate planning also assists the practitioner in properly assigning work to engagement team members and facilitates the direction, supervision, and review of their work. Further, it assists, when applicable, the coordination of work performed by other practitioners and practitioner's specialists. The nature and extent of planning activities will vary with the engagement circumstances, for example, the complexity of the assessment or evaluation of the subject matter and the practitioner's previous experience with it. Examples of relevant matters that may be considered include the following:</p> <ul style="list-style-type: none"> • The characteristics of the engagement that define its scope, including the terms of the engagement, the characteristics of the underlying subject matter, and the criteria • The expected timing and nature of the communications required

Commented [MG11]: Wording is appropriately different than corresponding wording in 205.

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	<ul style="list-style-type: none"> • The results of preliminary engagement activities, such as client acceptance, and, when applicable, whether knowledge gained on other engagements performed by the engagement partner for the <u>appropriate party</u> is relevant • The engagement process, including possible sources of <u>limited assurance review</u> evidence, and choices among alternative measurement or evaluation methods • The practitioner's understanding of the <u>appropriate party</u> and its environment, including the risks that the subject matter may be materially misstated • Identification of intended users and their information needs and consideration of materiality and the components of attestation risk • The risk of fraud relevant to the engagement • The effect on the engagement of using the internal audit function <p><u>.A12-A13</u> The practitioner may decide to discuss elements of planning with the <u>appropriate party</u> to facilitate the conduct and management of the engagement (for example, to coordinate some of the planned procedures with the work of the responsible party's personnel). Although these discussions often occur, the elements of planning remain the practitioner's responsibility. When discussing planning matters, care is needed to avoid compromising the effectiveness of the engagement. For example, discussing the nature and timing of detailed procedures with the responsible party may compromise the effectiveness of the engagement by making the procedures too predictable.</p>

Commented [MG12]: The term "appropriate party" is correct here as the presentation is consistent with paragraph A9 from extant AT-C section 210.

Commented [MG13]: Same comment as preceding.

Commented [MG14]: Same comment as preceding (see paragraph .A10 in extant AT-C section 210).

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	<p>.A13-A14 Planning is not a discrete phase but, rather, a cumulative and iterative process throughout the engagement. As a result of unexpected events, changes in conditions, or limited assurance review evidence obtained, the practitioner may need to revise the nature, timing, and extent of planned procedures.</p> <p>.A14-A15 In smaller or less complex engagements, the entire engagement may be conducted by a very small engagement team, possibly involving the engagement partner (who may be a sole practitioner) working without any other engagement team members. With a smaller team, coordination of, and communication among, team members is easier. In such cases, planning the engagement need not be a complex or time-consuming exercise; it varies according to the size of the entity, the complexity of the engagement, and the size of the engagement team.</p>
<p>.12-13 The practitioner should obtain an understanding of the subject matter and other engagement circumstances sufficient to do the following: (Ref: par. .A15<u>A16</u>)</p>	<p>.A15-A16 Obtaining an understanding of the subject matter and other engagement circumstances provides the practitioner with a frame of reference for exercising professional judgment throughout the engagement, for example, when doing the following:</p> <ul style="list-style-type: none"> • Considering the characteristics of the subject matter • Assessing the suitability of the criteria • Considering the factors that, in the practitioner's professional judgment, are significant in directing the engagement team's efforts, including situations in which special consideration may be necessary (for example, when there is a need for specialized skills or the work of a specialist)

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<p><i>a.</i> Enable the practitioner to identify areas in which a material misstatement of the subject matter is likely to arise (Ref: par. A16A17)</p> <p><i>b.</i> Provide a basis for designing and performing procedures to address the areas identified in item (<i>a</i>) and to obtain limited assurance about whether any material modifications should be made to the subject matter in order for it to be in accordance with (or based on) the criteria, or the assertion, in order for it to be fairly stated</p>	<ul style="list-style-type: none"> • Establishing and evaluating the continued appropriateness of quantitative materiality levels (when appropriate) and considering qualitative materiality factors • Developing expectations when performing analytical procedures • Designing and performing procedures • Evaluating limited assurancereview evidence, including the reasonableness of the written representations received by the practitioner <p>In some limited assurance engagementreview engagements, the practitioner may obtain an understanding of internal control over the measurement, evaluation, or disclosure of the subject matter.</p> <p>A16-A17 Identifying the areas in which a material misstatement of the subject matter is likely to arise enables the practitioner to focus procedures on those areas. For example, the practitioner may focus procedures on areas that are subjective in nature.</p>
<p>.13-14 The practitioner should make inquiries of the appropriate responsible party regarding</p> <p><i>a.</i> whether the responsible party has an internal audit function. If the responsible party has an internal audit function, the practitioner should make further inquiries to obtain an understanding of the activities and main findings of the internal audit function with respect to the subject matter.</p>	

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<p><i>b.</i> whether the responsible party has used any specialists in the preparation of the subject matter.</p>	
<p>Materiality in Planning and Performing the Engagement</p> <p>.14–15 The practitioner should consider materiality when establishing the overall engagement strategy, determining the nature, timing, and extent of procedures, and evaluating whether the practitioner is aware of any material modifications that should be made to the subject matter in order for it to be in accordance with (or based on) the criteria or the assertion in order for it to be fairly stated. (Ref: par. .A17A18–.A23A24)</p>	<p>Materiality in Planning and Performing the Engagement (Ref: par. .1415)</p> <p>.A17–A18 Materiality is considered in the context of qualitative factors and, when applicable, quantitative factors. The relative importance of qualitative factors and quantitative factors when considering materiality in a particular engagement is a matter for the practitioner's professional judgment.</p> <p>.A18–A19 Professional judgments about materiality are made in light of surrounding circumstances, but they are not affected by the level of assurance; that is, for the same intended users, materiality for a limited assurance engagement <i>review engagement</i> is the same as it is for an examination engagement because materiality is based on the information needs of intended users and not the level of assurance.</p> <p>.A19–A20 In general, misstatements, including omissions, are considered to be material if, individually or in the aggregate, they could reasonably be expected to influence relevant decisions of intended users that are made based on the subject matter. The practitioner's consideration of materiality is a matter of professional judgment and is affected by the practitioner's perception of the common information needs of intended users as a group. In this context, it is reasonable for the practitioner to assume that intended users</p> <ul style="list-style-type: none"> <i>a.</i> have a reasonable knowledge of the subject matter and a willingness to study the subject matter with reasonable diligence. <i>b.</i> understand that the subject matter is measured or evaluated and subjected to procedures using appropriate levels of materiality and

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	<p>that they have an understanding of any materiality concepts included in the criteria.</p> <p>c. understand any inherent uncertainties involved in measuring or evaluating the subject matter.</p> <p>d. make reasonable decisions on the basis of the subject matter taken as a whole.</p> <p>Unless the engagement has been designed to meet the particular information needs of specific users, the possible effect of misstatements on specific users, whose information needs may vary widely, is not ordinarily considered.</p> <p>A20-A21 Qualitative factors may include the following:</p> <ul style="list-style-type: none"> • The interaction between, and relative importance of, various aspects of the subject matter, such as numerous performance indicators • The wording chosen with respect to subject matter that is expressed in narrative form; for example, the wording chosen does not omit or distort the information • The characteristics of the presentation adopted for the subject matter when the criteria allow for variations in that presentation • The nature of a misstatement • Whether a misstatement affects compliance with laws or regulations

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	<ul style="list-style-type: none"> • In the case of periodic reporting on a subject matter, whether the effect of an adjustment that affects past or current information about the subject matter is likely to affect future information about the subject matter • Whether a misstatement is the result of an intentional act or is unintentional • Whether a misstatement is significant with regard to the practitioner's understanding of known previous communications to users, for example, in relation to the expected outcome of the measurement or evaluation of the subject matter • Whether a misstatement relates to the relationship between the responsible party and, if different, the engaging party or its relationship with other parties <p>.A21-A22 Quantitative factors relate to the magnitude of misstatements relative to reported amounts for those aspects of the subject matter, if any, that are</p> <ul style="list-style-type: none"> • expressed numerically or • otherwise related to numerical values. <p>.A22-A23 When quantitative factors are applicable, planning the engagement solely to detect individually material misstatements overlooks the fact that the aggregate of individually immaterial misstatements may cause the subject matter to be materially misstated. Applying materiality to elements of the subject matter ordinarily is not a simple mechanical calculation but involves the exercise of professional judgment. It is affected by the practitioner's understanding of the subject</p>

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	<p>matter and the responsible party and consideration of the nature and extent of misstatements identified in previous attestation engagements.</p> <p>.A23-A24 The criteria may discuss the concept of materiality in the context of the preparation and presentation of the subject matter and thereby provide a frame of reference for the practitioner in considering materiality for the engagement. Although criteria may discuss materiality in different terms, the concept of materiality generally includes the matters discussed in paragraphs .A17A18-.A22A23. If the criteria do not include a discussion of the concept of materiality, these paragraphs provide the practitioner with a frame of reference.</p>
.15-16 The practitioner should reconsider materiality for the subject matter if the practitioner becomes aware of information during the engagement that would have caused the practitioner to have initially determined a different materiality.	
Procedures to Be Performed	Procedures to Be Performed (Ref: par. .1718-.1819)
.16-17 To obtain limited assurance, the practitioner should obtain sufficient appropriate limited assurance review evidence to reduce attestation risk to a level that is acceptable in the circumstances of the engagement as a basis for expressing a conclusion about whether the practitioner is aware of any material modifications that should be made to the subject matter in order for it to be in accordance with (or based on) the criteria, or the assertion, in order for it to be fairly stated.	
<p>.17-18 Based on the practitioner’s understanding obtained pursuant to paragraph .1213, the practitioner should do the following:</p> <p>a. Identify areas in which a material misstatement of the subject matter is likely to arise and design and perform procedures to address such areas to obtain limited assurance to support the conclusion in the practitioner’s report. (Ref: par. .A24A25-.A29A30)</p>	.A24-A25 In a limited assurance engagement review, procedures generally are limited to inquiries and analytical procedures. However, analytical procedures may not be possible when the subject matter is qualitative, rather than quantitative. In circumstances in which inquiry and analytical procedures are not expected to provide sufficient

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<p>b. If no such areas are identified, design and perform procedures to obtain limited assurance to support the conclusion in the practitioner's report.</p>	<p>appropriate limited assurancereview evidence, or when the nature of the subject matter does not lend itself to the application of analytical procedures, the practitioner may perform other procedures that he or she<u>the practitioner</u> believes can provide the practitioner with a level of assurance equivalent to that which inquiries and analytical procedures would have provided. If the practitioner cannot design other procedures to obtain sufficient appropriate limited assurancereview evidence, a limited assurance engagementreview may not be appropriate.</p> <p>.A25-A26 <u>Limited Assurance</u>Review evidence obtained through the performance of analytical procedures and inquiry may provide the practitioner with a reasonable basis for obtaining limited assurance. However, the practitioner may determine that it is appropriate to perform additional or other procedures if the practitioner determines such procedures to be necessary to meet the objectives of this section.</p> <p>.A26-A27 The nature of the subject matter may not lend itself to the application of analytical procedures. In such instances, the practitioner may perform other procedures that the practitioner believes can provide a level of assurance equivalent to that which analytical procedures would have provided.</p> <p>.A27-A28 The practitioner's work in forming a conclusion consists of obtaining and evaluating evidence. Procedures to obtain evidence may, but are not required to, include the following, individually or in some combination, in addition to inquiry:</p> <ul style="list-style-type: none"> • Inspection • Observation • Confirmation • Recalculation • Reperformance

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	<ul style="list-style-type: none"> Analytical procedures <p>.A28-A29 Information may come to the practitioner's attention that differs significantly from that on which the determination of planned procedures was based. As the practitioner performs planned procedures, the limited assurance review evidence obtained may cause the practitioner to perform additional procedures. Such procedures may include asking the responsible party to examine the matter identified by the practitioner and to make adjustments to the subject matter, if appropriate.</p> <p>.A29-A30 In some cases, a subject matter AT-C section may include requirements that affect the nature, timing, and extent of procedures. For example, a subject matter AT-C section may describe the nature or extent of particular procedures to be performed in a particular type of engagement. Even in such cases, determining the exact nature, timing, and extent of procedures is a matter of professional judgment and will vary from one engagement to the next.</p>
<p>.18-19 The practitioner should place increased focus on those areas in which the practitioner believes there are increased risks that the subject matter may be materially misstated. (Ref: par. .A30A31-.A31A32)</p>	<p>.A30-A31 The results of the practitioner's procedures may modify the practitioner's risk awareness.</p> <p>.A31-A32 The practitioner may become aware of a matter that causes the practitioner to believe that the subject matter may be materially misstated. For example, when performing analytical procedures, the practitioner may identify a fluctuation or relationship that is inconsistent with other relevant information or that differs significantly from expected amounts or ratios. In such cases, the practitioner's investigation of such differences may include inquiring of the appropriate responsible party or performing other procedures as appropriate in the circumstances.</p>
Analytical Procedures	Analytical Procedures (Ref: par. .1920-.2021)

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<p>.19-20 Unless the nature of the subject matter does not lend itself to the application of analytical procedures, the practitioner should When designing and performing analytical procedures, the practitioner should and do the following: (Ref: par. .A32A33-.A33A34)</p> <p>a. Determine the suitability of particular analytical procedures for the subject matter, taking into account the practitioner's awareness of risks</p> <p>b. Evaluate the reliability of data from which the practitioner's expectation is developed, taking into account the source, comparability, nature, and relevance of information available</p> <p>c. Develop an expectation with respect to recorded amounts or ratios</p>	<p>.A32-A33 An understanding of the purposes of analytical procedures and the limitations of those procedures is important. Accordingly, the identification of the relationships and types of data used, as well as conclusions reached when recorded amounts are compared to expectations, requires professional judgment by the practitioner.</p> <p>.A33-A34 Analytical procedures involve comparisons of expectations developed by the practitioner to recorded amounts or ratios developed from recorded amounts. The practitioner develops such expectations by identifying and using plausible relationships that are reasonably expected to exist based on the practitioner's understanding of the subject matter; the practices used by the responsible party to measure, recognize, and record the subject matter; and, if applicable, the industry in which the entity operates.</p>
<p>.20-21 If analytical procedures identify fluctuations or relationships that are inconsistent with other relevant information or that differ significantly from expected amounts or ratios, the practitioner should (Ref: par. .A34A35)</p> <p>a. inquire of the responsible party about such differences and</p> <p>b. consider the responses to these inquiries to determine whether other procedures are necessary in the circumstances.</p>	<p>.A34-A35 Analytical procedures in a limited assurance engagement review engagement are not designed to identify misstatements with the level of precision expected in an examination engagement. Further, when significant fluctuations, relationships, or differences are identified, appropriate limited assurance review evidence in a limited assurance engagement review engagement may often be obtained by making inquiries of the responsible party and considering responses received in the light of known engagement circumstances without obtaining additional evidence required in the case of an examination engagement.</p>
<p>Inquiries</p> <p>.21-22 The practitioner should inquire of the appropriate responsible party about the following:</p>	

Commented [MG15]: In response to GT comment.

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<p>a. The extent to which the subject matter has been measured or evaluated by a party other than the practitioner and the results of such measurement or evaluation</p> <p>b. The practices used to measure, recognize, and record the subject matter</p> <p>c. Questions that have arisen in the course of applying the procedures</p> <p>d. Communications from regulatory agencies or others, if relevant</p>	
<p>.22-23 The practitioner should consider the reasonableness and consistency of the responsible party's responses in light of the results of other procedures and the practitioner's knowledge of the subject matter, criteria, and responsible party.</p>	
<p>Fraud, Laws, and Regulations</p> <p>.23-24 The practitioner should make inquiries of <u>the</u> appropriate parties party to determine whether they the party have has knowledge of any actual, suspected, or alleged fraud or noncompliance with laws or regulations affecting the subject matter.</p>	<p>Fraud, Laws, and Regulations (Ref: par. .2425)</p>
<p>.24-25 The practitioner should respond appropriately to fraud or suspected fraud and noncompliance or suspected noncompliance with laws or regulations affecting the subject matter that is identified during the engagement. (Ref: par. .A35A36-.A36A37)</p>	<p>.A35-A36 In responding to fraud or suspected fraud identified during the engagement, it may be appropriate, unless prohibited by law, regulation, or ethics standards, for the practitioner to, for example, do the following:</p> <ul style="list-style-type: none"> • Discuss the matter with the <u>appropriate party</u>. • Request that the responsible party consult with an appropriately qualified third party, such as the entity's legal counsel or a regulator.

Commented [MG16]: Revisions made for consistency with paragraph .32b in 205.

Commented [MG17]: Consistent with paragraph .A31 of extant AT-C section 210.

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	<ul style="list-style-type: none"> • Consider the implications of the matter in relation to other aspects of the engagement, including the practitioner's planning and the reliability of written representations from the responsible party. • Obtain legal advice about the consequences of different courses of action. • Communicate with third parties (for example, a regulator). • Withdraw from the engagement. <p>.A36–A37 The actions noted in paragraph .A35–A36 may also be appropriate in responding to noncompliance or suspected noncompliance with laws or regulations identified during the engagement. It may also be appropriate to describe the matter in a separate paragraph of the practitioner's report, unless either of the following apply:</p> <ol style="list-style-type: none"> a. The practitioner is precluded by the responsible party from obtaining sufficient appropriate limited assurancereview evidence to evaluate whether noncompliance that may be material to the subject matter has, or is likely to have, occurred, in which case, paragraph .59 applies. b. The practitioner concludes that the noncompliance results in a material misstatement of the subject matter, in which case, paragraphs .5253–.58 apply.
Determining Whether Additional Procedures Are Necessary in a Limited AssuranceReview Engagement	Determining Whether Additional Procedures Are Necessary in a Limited AssuranceReview Engagement (Ref: par. .2526)

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<p>.25–26 The practitioner should evaluate whether sufficient appropriate evidence has been obtained from the procedures performed and, if not, the practitioner should perform additional procedures judged by the practitioner to be necessary in the circumstances to be able to form a conclusion on the subject matter. If the practitioner is unable to obtain sufficient appropriate evidence, paragraph .59 provides requirements in the circumstances. (Ref: par. .A37A38)</p>	<p>.A37A38 In some circumstances, the practitioner may not have obtained the evidence that the practitioner had expected to obtain through the design and performance of procedures. In these circumstances, the practitioner may</p> <ul style="list-style-type: none"> • extend the work performed or • perform other procedures judged by the practitioner to be necessary in the circumstances. <p>When neither of these is practicable in the circumstances, the practitioner will not be able to obtain sufficient appropriate evidence to be able to form a conclusion.</p>
<p>Incorrect, Incomplete, or Otherwise Unsatisfactory Information</p>	
<p>.26–27 During the performance of procedures, if the practitioner becomes aware that information coming to the practitioner's attention is incorrect, incomplete, or otherwise unsatisfactory, the practitioner should request that the responsible party consider the effect of these matters on the subject matter and communicate the results of its consideration to the practitioner. The practitioner should consider the results communicated to the practitioner by the responsible party and the potential effect, if any, on the practitioner's report.</p>	
<p>.27–28 If the practitioner believes the subject matter may be materially misstated, the practitioner should perform additional procedures sufficient to obtain limited assurance about whether any material modifications should be made to the subject matter in order for it to be in accordance with (or based on) the criteria or the assertion in order for it to be fairly stated.</p>	
<p>Using the Work of a Practitioner's Specialist or Internal Auditors</p>	

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.28–29 When the practitioner expects to use the work of a practitioner's specialist or internal auditors, the practitioner should apply the requirements in AT-C section 205, <i>Examination Engagements</i> , and the related application guidance, as appropriate, for a limited assurance review engagement. ²	
Evaluating the Results of Procedures	Evaluating the Results of Procedures (Ref: par. .2930–.3031)
.29–30 The practitioner should accumulate misstatements identified during the engagement, other than those that are clearly trivial. (Ref: par. .A38A39–.A39A40)	.A38–A39 Uncorrected misstatements are accumulated during the engagement for the purpose of evaluating whether, individually or in the aggregate, they are material when forming the practitioner's conclusion. .A39–A40 "Clearly trivial" is not another expression for "not material." Matters that are clearly trivial will be of a wholly different (smaller) order of magnitude than materiality and will be matters that are clearly inconsequential, whether taken individually or in the aggregate and whether judged by any criteria of size, nature, or circumstances. When there is any uncertainty about whether items are clearly trivial, the matter is considered not to be clearly trivial.
.30–31 The practitioner should evaluate the sufficiency and appropriateness of the limited assurance review evidence obtained in the context of the engagement and, if necessary, attempt to obtain further limited assurance review evidence. The practitioner should consider all relevant limited assurance review evidence, regardless of whether it appears to corroborate or contradict the measurement or evaluation of the subject matter against the criteria. (Ref: par. .A40A41–.A42A43)	.A40–A41 Sufficient appropriate limited assurance review evidence is necessary to support the practitioner's conclusion and report. .A41–A42 The sufficiency and appropriateness of limited assurance review evidence are interrelated. <i>Sufficiency of limited assurance review evidence</i> is the measure of the quantity of limited assurance review evidence. The quantity of the limited assurance review evidence needed is affected by the risks of material misstatement and also by the quality of such limited assurance review evidence.

Commented [MG18]: The corresponding paragraph in 205 (.A52) is much more extensive.

² Paragraphs .36–.44 of AT-C section 205, *Examination Engagements*.

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	.A42 – A43 Whether sufficient appropriate limited assurance review evidence has been obtained on which to base the practitioner's conclusion is a matter of professional judgment.
.31 – 32 If the practitioner concludes that the subject matter is materially misstated, the practitioner should consider the implications for the practitioner's conclusion in paragraphs .54 – 55 –.59.	
Considering Subsequent Events and Subsequently Discovered Facts	Considering Subsequent Events and Subsequently Discovered Facts (Ref: par. .323–334)
.32 – 33 The practitioner should inquire whether the responsible party, and if different, the engaging party, is aware of any events subsequent to the period (or point in time) covered by the <u>review</u> engagement up to the date of the practitioner's report that could have a significant effect on the subject matter or assertion. If the practitioner becomes aware, through inquiry or otherwise, of such an event, or any other event that is of such a nature and significance that its disclosure is necessary to prevent users of the report from being misled, and information about that event is not adequately disclosed by the responsible party in the subject matter or in its assertion, the practitioner should take appropriate action. (Ref: par. .A43 A44 – A45 A46)	<p>.A43–A44 For certain subject matter AT-C sections, specific subsequent events requirements and related application guidance have been developed for engagement performance and reporting.</p> <p>.A44–A45 Procedures that a practitioner may perform to identify subsequent events include inquiring about and considering information</p> <ul style="list-style-type: none"> • contained in relevant reports issued during the subsequent period by internal auditors, other practitioners, or regulatory agencies. • obtained through other professional engagements for that entity. <p>.A45–A46 If the responsible party refuses to disclose a subsequent event for which disclosure is necessary to prevent users of the practitioner's report from being misled, appropriate actions the practitioner may take include the following:</p> <ul style="list-style-type: none"> • Disclosing the event in the report and modifying the practitioner's conclusion • Withdrawing from the engagement
.33 – 34 The practitioner has no responsibility to perform any procedures regarding the subject matter or assertion after the date	.A46 – A47 Subsequent to the date of the practitioner's report, the practitioner may become aware of facts that, had they been known to the

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<p>of the practitioner's report. Nevertheless, the practitioner should respond appropriately to facts that become known to the practitioner after the date of the report that, had they been known to the practitioner at that date, may have caused the practitioner to revise the report. (Ref: par. .A46A47-.A47A48)</p>	<p>practitioner at that date, may have caused the practitioner to revise the report. In such circumstances, the practitioner undertakes to determine if the facts existed at the date of the report and, if so, whether persons <u>who would attach importance to these facts</u> are currently using, or are likely to use, the report and related subject matter or assertion who would attach importance to these facts. This may include discussing the matter with the appropriate party and requesting the appropriate party's cooperation in whatever investigation or further action may be necessary. The specific actions to be taken in a particular case by the appropriate party and the practitioner may vary with the circumstances. Consideration may be given to, among other things, the time elapsed since the date of the report and whether issuance of a subsequent report is imminent. The practitioner may need to perform additional procedures deemed necessary to determine whether the subject matter or assertion needs revision and whether the previously issued report continues to be appropriate.</p> <p>.A47 A48 Depending on the circumstances, the practitioner may determine that notification of the situation by the appropriate party to persons who would attach importance to these facts and who are currently using, or are likely to use, the practitioner's report is necessary. This may be the case, for example, when</p> <ul style="list-style-type: none"> a. the report is not to be relied upon because the subject matter or assertion needs revision or the practitioner is unable to determine whether revision is necessary, and b. issuance of a subsequent report is not imminent. <p>If the appropriate party failed to take the necessary steps to prevent reliance on the report, the practitioner's course of action depends on the practitioner's legal and ethical rights and obligations. Consequently, the</p>

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<p>Written Representations</p> <p>.34-35 The practitioner should request from the <u>appropriate responsible</u> party written representations in the form of a letter addressed to the practitioner. The representations should do the following: (Ref: par. .A48A49-.A52)</p> <p>a. Acknowledge the responsibilities responsibility of the appropriate party, including for that</p> <p>i. the responsible party is responsible for the subject matter in accordance with (or based on) the criteria, <u>or if only the practitioner has measured or evaluated the subject matter against the criteria, responsibility for the subject matter, and, if applicable, responsibility for the assertion;</u> and</p> <p>ii. the appropriate party is responsible for (1) identifying the criteria for the measurement, evaluation, or disclosure of the subject matter and</p> <p>(2) iii. determining that such criteria are suitable and will be available to the intended users.</p>	<p>practitioner may consider it appropriate to seek legal advice prior to making any disclosure of the situation. Disclosure of the situation directly by the practitioner may include a description of the nature of the matter and of its effect on the subject matter or assertion and the report, avoiding comments concerning the conduct or motives of any person.</p> <p>Written Representations (Ref: par. .3435)</p> <p>.A48 The term <i>appropriate party</i> is used in paragraph .34 to accommodate situations in which the engaging party is not the responsible party. In such situations, a particular representation may be applicable to only the responsible party, only the engaging party, or to both parties, as appropriate.</p> <p>.A49 Written confirmation of oral representations reduces the possibility of misunderstandings between the practitioner and the <u>appropriate responsible</u> party. The person from whom the practitioner requests written representations is ordinarily a member of senior management or those charged with governance depending on, for example, the management and governance structure of the responsible party, which may vary by entity, reflecting influences such as size and ownership characteristics.</p> <p>.A50 Representations by the responsible party cannot replace other limited assurance review evidence the practitioner could reasonably expect to be available. Although written representations provide limited assurance review evidence, they do not provide sufficient appropriate limited assurance review evidence on their own about any of the matters with which they deal. Furthermore, the fact that the practitioner has received reliable written representations does not affect the nature or extent of other limited assurance review evidence that the practitioner obtains.</p>

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<p>b. State that the appropriate-responsible party has provided the practitioner with all relevant information and access, as agreed upon in the terms of the engagement.</p> <p>c. State that all known matters contradicting the subject matter or assertion and any communication from regulatory agencies or others affecting the subject matter or assertion have been disclosed to the practitioner, including communications received between the end of the period addressed by the subject matter and the date of the practitioner's report.</p> <p>d. State that the appropriate-responsible party has disclosed to the practitioner</p> <p>i. its knowledge of any actual, suspected, or alleged fraud or noncompliance with laws or regulations affecting the subject matter and</p> <p>ii. other matters as the practitioner deems appropriate.</p> <p>e. State that any known events subsequent to the period (or point in time) of the subject matter being reported on that would have a material effect on the subject matter or assertion have been disclosed to the practitioner. (Ref: par. .A51)</p> <p>f. State whether a party other than the practitioner has measured or evaluated the subject matter against the criteria, and, if another party has measured or evaluated the subject matter, the results of that measurement or evaluation. (Ref: par. .A52)</p>	<p>.A51 A discussion of what is considered a material effect on the subject matter or assertion may be included explicitly in the representation letter in qualitative or quantitative terms.</p> <p>.A52 <u>When reporting on the assertion,</u> The results of the appropriate responsible party's measurement or evaluation of the subject matter against the criteria may be provided to the practitioner in a separate written assertion or as a representation in the representation letter.</p> <p>.A53 A summary of uncorrected misstatements ordinarily is included in or attached to the written representation.</p>

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<p>g. If applicable, state that the responsible party believes the effects of uncorrected misstatements are immaterial, individually and in the aggregate, to the subject matter. (Ref: par. .A51 and .A53)</p> <p>h. If applicable, state that significant assumptions used in making any material estimates are reasonable.</p>	
<p>.35-36 When the engaging party is not the responsible party, the practitioner should request written representations from both the responsible party and the engaging party, as applicable. <u>applicable</u> in addition to those from the responsible party, in the form of a letter addressed to the practitioner. The representations <u>should do the following:</u> (Ref: par. .A54)</p> <p><u>a. Acknowledge that the responsible party is responsible for the subject matter and, if applicable, the assertion.</u></p> <p><u>b. Acknowledge the engaging party's responsibility for identifying the criteria, if applicable.</u></p> <p><u>c. Acknowledge the engaging party's responsibility for determining that such criteria are appropriate for its purposes.</u></p> <p><u>d. State that the engaging party is not aware of any material misstatements in the subject matter or assertion.</u></p> <p><u>e. State that the engaging party has disclosed to the practitioner all known events subsequent to the period (or point in time) of the subject matter being reported on that would have a material effect on the subject matter or assertion.</u></p> <p><u>f. Address other matters as the practitioner deems appropriate.</u></p>	<p>.A54 When the engaging party is not the responsible party, examples of written representations the practitioner may request from the engaging party are representations that do the following:</p> <p>a. Acknowledge that the responsible party is responsible for the subject matter and, if applicable, the assertion.</p> <p>b. Acknowledge the engaging party's responsibility for selecting the criteria, when applicable.</p> <p>c. Acknowledge the engaging party's responsibility for determining that such criteria are appropriate for its purposes.</p> <p>d. State that the engaging party is not aware of any material misstatements in the subject matter or assertion.</p> <p>e. State that the engaging party has disclosed to the practitioner all known events subsequent to the period (or point in time) of the subject matter being reported on that would have a material effect on the subject matter or assertion.</p> <p>f. Address other matters as the practitioner deems appropriate.</p>
<p>.36-37 When written representations are directly related to matters that are material to the subject matter, the practitioner should</p>	

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<p>a. evaluate their reasonableness and consistency with other limited assurance <i>review</i> evidence obtained, including other representations, and</p> <p>b. consider whether those making the representations can be expected to be well informed on the particular matters.</p>	
<p>.37-38 The date of the written representations should be as of the date of the practitioner's report. The written representations should address the subject matter and periods covered by the practitioner's conclusion.</p>	
<p>Requested Written Representations Not Provided or Unreliable Not Reliable</p> <p>.38-39 When one or more of the requested written representations are not provided, or the practitioner concludes that there is sufficient doubt about the competence, integrity, ethical values, or diligence of those providing the written representations, or the practitioner concludes that the written representations are otherwise not reliable, the practitioner should do the following: (Ref: par. .A55A54-.A57A56)</p> <p>a. Discuss the matter with the appropriate party.</p> <p>b. Reevaluate the integrity of those from whom the representations were requested or received and evaluate the effect that this may have on the reliability of representations and limited assurance <i>review</i> evidence in general.</p> <p>c. If any of the matters are not resolved to the practitioner's satisfaction, take appropriate action, including determining the possible effect on the conclusion in the practitioner's report.</p>	<p>Requested Written Representations Not Provided or Unreliable Not Reliable (Ref: par. .38-39 and .59)</p> <p>.A55-A54 The engaging party's refusal to furnish written representations constitutes a limitation on the scope of the limited assurance engagement <i>review</i>. Such refusal may cause the practitioner to withdraw, when withdrawal is possible under applicable laws and regulations, in accordance with paragraph .59.</p> <p>.A56-A55 Circumstances in which the practitioner may be unable to obtain one or more requested written representations from a responsible party that is not the engaging party include, for example, the following:</p> <ul style="list-style-type: none"> • When the engaging party does not have a relationship with the responsible party • When the limited assurance engagement <i>review</i> is undertaken against the wishes of the responsible party, for example when required by law or regulation <p>In these or other circumstances, the practitioner may need to reconsider whether the responsible party is able or willing to take responsibility for the subject matter. Additionally, the practitioner may not have access to</p>

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	<p>the evidence needed to support the conclusion in the practitioner's report. If this is the case, paragraph .59 of this section applies.</p> <p>.A57-A56 The practitioner may determine, after performing the procedures in items (a)-(b) of paragraph .3839, that an oral representation may provide a portion of the evidence needed with respect to the matter addressed by the representation, for example when the engaging party is not the responsible party.</p>
<p>Other Information</p> <p>.39-40 If prior to or after the release of the practitioner's report on subject matter or an assertion, the practitioner is willing to permit the inclusion of the report in a document that contains the subject matter or assertion and other information, the practitioner should read the other information to identify material inconsistencies, if any, with the subject matter, assertion, or practitioner's report. If upon reading the other information, in the practitioner's professional judgment, either of the following applies, the practitioner should discuss the matter with the appropriate <u>responsible</u> party and take further action as appropriate: (Ref: par. .A58A57-.A59A58)</p> <p>a. A material inconsistency between that other information and the subject matter <u>information</u>, assertion, or <u>the</u> report exists.</p> <p>b. A material misstatement of fact exists in the other information, the subject matter <u>information</u>, assertion, or practitioner's report.</p>	<p>Other Information (Ref: par. .3940)</p> <p>.A58-A57 Further actions that may be appropriate if the practitioner identifies a material inconsistency or becomes aware of a material misstatement of fact include, for example, the following:</p> <ul style="list-style-type: none"> Requesting the <u>appropriate party</u> to consult with a qualified third party, such as the <u>appropriate party's</u> legal counsel Obtaining legal advice about the consequences of different courses of action If required or permissible, communicating with third parties (for example, a regulator) Describing the material inconsistency in the practitioner's report Withdrawing from the engagement, when withdrawal is possible under applicable law or regulation <p>.A59-A58 Other information does not include information contained on the <u>appropriate party's</u> website. Websites are a means of distributing information and are not, themselves, documents for the purposes of paragraph .3940.</p>
Description of Criteria	Description of Criteria (Ref: par. .4041)

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<p>.40-41 The practitioner should evaluate whether the written description of the subject matter or assertion adequately refers to or describes the criteria. (Ref: par. .A60A59-.A61A60)</p>	<p>.A60-A59 The description of the criteria on which the subject matter or assertion is based is particularly important when there are significant differences between-among various criteria regarding how particular matters may be treated in the subject matter.</p> <p>.A61-A60 A description of the criteria that states that the subject matter is prepared in accordance with (or based on) particular criteria is appropriate only if the subject matter complies with all relevant requirements of those criteria that are effective.</p>
<p>Forming the Conclusion</p> <p>.41-42 The practitioner should form a conclusion about whether the practitioner is aware of any material modifications that should be made to the subject matter in order for it to be in accordance with (or based on) the criteria or to the responsible party's assertion in order for it to be fairly stated. In forming that conclusion, the practitioner should evaluate</p> <p>a. the practitioner's conclusion regarding the sufficiency and appropriateness of the limited assurance review evidence obtained and (Ref: par. .A62A61)</p>	<p>Forming the Conclusion (Ref: par. .4142-.4243)</p> <p>.A62-A61 The practitioner's professional judgment regarding what constitutes sufficient appropriate limited assurance review evidence is influenced by such factors as the following:</p> <ul style="list-style-type: none"> • The significance of a potential misstatement and the likelihood that it will have a material effect, individually or aggregated with other potential misstatements, on the subject matter or assertion • The effectiveness of the responsible party's responses to address the known risks • The experience gained during previous examination or limited assurance review engagements with respect to similar potential misstatements • The results of procedures performed, including whether such procedures identified specific misstatements • The source and reliability of the available information • The persuasiveness of the limited assurance review evidence

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<p>b. whether uncorrected misstatements are material, individually or in the aggregate. (Ref: par. .A63<u>A62</u>)</p>	<ul style="list-style-type: none"> • The practitioner's understanding of the responsible party and its environment <p>.A63-A62 A limited assurance engagement<u>review engagement</u> is a cumulative and iterative process. As the practitioner performs planned procedures, the limited assurance<u>review</u> evidence obtained may cause the practitioner to change the nature, timing, or extent of other planned procedures. Information that differs significantly from the information on which the planned procedures were based may come to the practitioner's attention. Examples of such information include the following:</p> <ul style="list-style-type: none"> • The extent of the misstatements that the practitioner detects is greater than expected. (This may alter the practitioner's professional judgment about the reliability of particular sources of information.) • The practitioner may become aware of discrepancies in relevant information or conflicting or missing limited assurance<u>review</u> evidence. • Procedures performed toward the end of the engagement may indicate a previously unrecognized risk of material misstatement. In such circumstances, the practitioner may need to reevaluate the planned procedures.
<p>.42-43 The practitioner should evaluate, based on the limited assurance<u>review</u> evidence obtained, whether the presentation of the subject matter or assertion is misleading within the context of the engagement. (Ref: par. .A64<u>A63</u>-.A65<u>A64</u>)</p>	<p>.A64-A63 In making the evaluation required by paragraph .4243, the practitioner may consider whether additional disclosures are necessary to describe the subject matter, assertion, or criteria. Additional disclosures may, for example, include the following:</p> <ul style="list-style-type: none"> • The measurement or evaluation methods used when the criteria allow for choice among methods

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	<ul style="list-style-type: none"> • Significant interpretations made in applying the criteria in the engagement circumstances • Subsequent events, depending on their nature and significance • Whether there have been any changes in the measurement or evaluation methods used <p>.A65—A64 Paragraph .42—43 does not require the practitioner to determine whether the presentation discloses all matters related to the subject matter, assertion, or criteria or all matters <u>intended</u> users may consider in making decisions based on the presentation.</p>
<p>Preparing the Practitioner’s Report</p> <p>.43—44 The practitioner’s report should be in writing. (Ref: par. .A66A65—A68A67)</p>	<p>Preparing the Practitioner’s Report (Ref: par. .4344—4445 and .57)</p> <p>.A66—A65 Oral and other forms of expressing a conclusion can be misunderstood without the support of a written practitioner’s report. For this reason, the practitioner may not report orally or by use of symbols (such as a web seal) under the attestation standards without also providing a written report that is readily available whenever the oral report is provided or the symbol is used. For example, a symbol could be hyperlinked to a written report on the internet.</p> <p>.A67—A66 This section does not require a standardized format for reporting on all limited assurance engagement <i>review engagements</i>. Instead, it identifies the basic elements that the practitioner’s report is to include. The report is tailored to the specific engagement circumstances. The practitioner may use headings, separate paragraphs, paragraph numbers, typographical devices (for example, the bolding of text), and other mechanisms to enhance the clarity and readability of the report.</p> <p>.A68—A67 The practitioner may choose to issue a report that contains only the minimum reporting elements included in paragraphs .4647—47</p>

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	<p>48 of this section or may issue a report that expands on or supplements those elements. In addition to the basic elements, a report may include information and explanations that are not intended to affect the practitioner's conclusion, for example, detail about the terms of the engagement, the applicable criteria being used, findings relating to particular aspects of the engagement, details of the qualifications and experience of the practitioner and others involved in the engagement, a description of the procedures the practitioner performed, and, in some cases, recommendations. The practitioner may find it helpful to consider the importance of providing such information to the information needs of the intended users. As required by paragraph .57, additional information is clearly separated from the practitioner's conclusion and phrased in a manner that makes it clear that it is not intended to detract from that conclusion.</p>														
<p>.44-45 A practitioner should report on a written assertion or directly on the subject matter. As discussed in paragraph .56, if the report is modified for a material misstatement, the practitioner should report directly on the subject matter. Additionally, before the practitioner reports on management's assertion, the practitioner should use professional judgment in determining whether management has a reasonable basis for making its assertion. (Ref: par. .A69A68-.A70A69)</p> <p>.45-46 The practitioner should obtain a writtenan assertion if the practitioner is reporting on the assertion. The assertion should be bound with or accompany the practitioner's report, or the assertion should be clearly stated in the report. (Ref: par. .A10 and .A70A69-.A71A70)</p>	<p>.A69-A68 All of the following reporting options are available to a practitioner, except when the circumstances described in paragraph .56 exist:</p> <table border="1" data-bbox="808 893 1512 1209"> <thead> <tr> <th data-bbox="808 893 1123 1063"><i>The practitioner's report may state that the practitioner performed limited assurance review procedures on</i></th> <th data-bbox="1123 893 1281 1063"><i>and</i></th> <th data-bbox="1281 893 1512 1063"><i>concludes on</i></th> </tr> </thead> <tbody> <tr> <td data-bbox="808 1063 1123 1096">the subject matter</td> <td data-bbox="1123 1063 1281 1096"></td> <td data-bbox="1281 1063 1512 1096">the subject matter.</td> </tr> <tr> <td data-bbox="808 1096 1123 1153">the responsible party's assertion</td> <td data-bbox="1123 1096 1281 1153"></td> <td data-bbox="1281 1096 1512 1153">the responsible party's assertion.</td> </tr> <tr> <td data-bbox="808 1153 1123 1209">the responsible party's assertion</td> <td data-bbox="1123 1153 1281 1209"></td> <td data-bbox="1281 1153 1512 1209">the subject matter.</td> </tr> </tbody> </table>			<i>The practitioner's report may state that the practitioner performed limited assurance review procedures on</i>	<i>and</i>	<i>concludes on</i>	the subject matter		the subject matter.	the responsible party's assertion		the responsible party's assertion.	the responsible party's assertion		the subject matter.
<i>The practitioner's report may state that the practitioner performed limited assurance review procedures on</i>	<i>and</i>	<i>concludes on</i>													
the subject matter		the subject matter.													
the responsible party's assertion		the responsible party's assertion.													
the responsible party's assertion		the subject matter.													
	<p>.A70-A69 What constitutes a reasonable basis for the responsible party's assertion depends on the nature of the subject matter and other engagement circumstances. In some cases, a formal process with</p>														

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	<p>extensive internal control may be needed to provide the measurer or evaluator with a reasonable basis for making its assertion. The fact that the practitioner will report on the subject matter is not a substitute for the measurer or evaluator's own processes to have a reasonable basis for its assertion.</p> <p>.A71-A70 The following are examples of assertions that have been tailored to reflect the nature of the subject matter and criteria for the engagement:</p> <ul style="list-style-type: none"> • The subject matter is presented in accordance with (or based on) the criteria. • The subject matter is presented fairly, based on the criteria.
Content of the Practitioner's Report	Content of the Practitioner's Report
<p>.A6-A7 The practitioner's report should include the following:</p> <p>a. A title that includes the word <i>independent</i>. (Ref: par. .A72A71)</p> <p>b. An appropriate addressee as required by the circumstances of the engagement.</p> <p>c. An identification or description of the subject matter or assertion being reported on, including the point in time or period of time to which the measurement or evaluation of the subject matter or assertion relates.</p> <p>d. An identification of the criteria against which the subject matter was measured or evaluated (Ref: par. .A73A72)</p>	<p>Title (Ref: par. .A6aA7a)</p> <p>.A72-A71 A title indicating that the practitioner's report is the report of an independent practitioner (for example, "Independent Practitioner's Report," "Report of Independent Certified Public Accountant," or "Independent Accountant's <i>Limited Assurance</i> Report") affirms that the practitioner has met all the relevant ethical requirements regarding independence and, therefore, distinguishes the independent practitioner's report from reports issued by others.</p> <p>Criteria (Ref: par. .A6aA7d)</p> <p>.A73-A72 The practitioner's report may include the criteria or refer to them if they are included in the subject matter presentation, in the assertion, or are otherwise readily available. It may be relevant in the circumstances to disclose the source of the criteria or the relevant matters discussed in paragraph .A65A64.</p>

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<p>e. A statement that identifies the responsible party and its responsibility for the subject matter in accordance with (or based on) the criteria <u>or, if only the practitioner has measured or evaluated the subject matter against the criteria, responsibility for the subject matter, or, if applicable, for its assertion.</u> (Ref: par. .A74A73-.A76A75)</p> <p>f. A statement that the practitioner's responsibility is to express a conclusion on the subject matter or assertion based on the practitioner's limited—assurance engagement review. (Ref: par. .A74A73)</p> <p>g. A statement that</p> <p>i. the practitioner's limited assurance engagement review was conducted in accordance with attestation standards</p>	<p>Relative Responsibilities (Ref: par. .46e47e-g)</p> <p>.A74A73 Identifying relative responsibilities informs the intended users that the responsible party is responsible for the subject matter and that the practitioner's role is to independently express a conclusion about it.</p> <p>.A75-A74 The <u>If applicable, the</u> practitioner may wish to expand the discussion of the responsible party's responsibility, for example, to indicate that the responsible party is responsible for the preparation and presentation of the subject matter in accordance with (or based on) the criteria, including the design, implementation, and maintenance of internal control to prevent, or detect and correct, misstatement of the subject matter, due to fraud or error.</p> <p>.A76-A75 The practitioner's report may include a statement indicating that the responsible party</p> <ul style="list-style-type: none"> • measured or evaluated the subject matter in accordance with (or based on) the criteria and provided the practitioner with the results of that measurement or evaluation in its written assertion, or • did not measure or evaluate the subject matter in accordance with (or based on) the criteria. <p>.A77-A76 In identifying the standards under which the engagement was performed, the practitioner may specify the AT-C section under which the engagement was performed, for example “conducted in accordance with AT-C section 310, <i>Reporting on Pro Forma Financial Information</i>, of the attestation standards established by the American Institute of Certified Public Accountants.”</p>

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<p>established by the American Institute of Certified Public Accountants. (Ref: par. .A77A76)</p> <p>ii. those standards require that the practitioner plan and perform the engagement review to obtain limited assurance about whether any material modifications should be made to</p> <p>(1) the subject matter in order for it to be in accordance with (or based on) the criteria (or equivalent language regarding the subject matter and criteria, such as the language used in the examples in paragraph .A78A77) or,</p> <p>(2) if applicable, the responsible party's assertion in order for it to be fairly stated in all material respects.</p> <p>h. A statement that the procedures performed in a limited assurance engagement review vary in nature and timing from, and are <u>substantially</u> less in extent than, an examination, the objective of which is to obtain reasonable assurance about whether the subject matter is in accordance with (or based on) the criteria, in all material respects, or the responsible party's assertion is fairly stated, in all material respects, in order to express an opinion. As a consequence of the limited nature of the engagement, the level of assurance obtained in a limited assurance engagement review is substantially lower than the assurance that would have been obtained had an examination been performed.</p>	<p><i>Statement About the Subject Matter and Criteria (Ref: par. .46gii47gii(I) .A78-A77)</i> The language in paragraph .46gii47gii(1) may need to be tailored to reflect the nature of the subject matter and criteria for the engagement. Examples of language that meet the requirements in paragraph .46gii47gii(1) include "to obtain limited assurance about whether any material modifications should be made to [the subject matter] in order for it to</p> <ul style="list-style-type: none"> • be presented in accordance with (or based on) the criteria." • meet the objectives." (For example, when the objectives are the criteria) <p><i>Relevant Ethical Requirements (Ref: par. .46j47j)</i></p>

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<p>i. A statement that the practitioner believes the limited assurance <u>review</u> evidence the practitioner obtained is sufficient and appropriate to provide a reasonable basis for the practitioner's conclusion.</p> <p>j. A statement that the practitioner is <u>required to be independent of the entity</u> and has to meet <u>fulfilled</u> the practitioner's other ethical responsibilities, in accordance with <u>the relevant ethical requirements relating to the limited assurance engagement</u> review engagement. (Ref: par. .A79A78-.A80A79)</p> <p>k. A statement that describes significant inherent limitations, if any, associated with the measurement or evaluation of the subject matter against the criteria. (Ref: par. .A81A80)</p>	<p>.A79-A78 Relevant ethical requirements consist of the AICPA Code of Professional Conduct together with rules of state boards of accountancy and applicable regulatory agencies that are more restrictive. When the AICPA Code of Professional Conduct applies, the practitioner's other ethical responsibilities relate to the "Principles of Professional Conduct" (ET sec. 0.300).[‡]</p> <p>.A80-A79 Relevant ethical requirements may exist in several different sources, such as ethical codes and additional rules and requirements within law and regulation. When independence and other relevant ethical requirements are contained in a limited number of sources, the practitioner may choose to name the relevant sources (for example, the name of the code, rule, or applicable regulation, or <i>Government Auditing Standards</i> promulgated by the Comptroller General of the United States) or may refer to a term that appropriately describes those sources.</p> <p><i>Inherent Limitations (Ref: par. .A6k47k)</i></p> <p>.A81-A80 In some cases, identification of specific inherent limitations may be required by an AT-C section. To communicate specific inherent limitations, the illustrative practitioner's report on a limited assurance engagement <u>review</u> of pro forma financial information under AT-C section 310, for example, indicates that the objective of pro forma financial information is to show what the significant effects on the historical financial information might have been had the transaction (or event) occurred at an earlier date and that the pro forma condensed financial statements are not necessarily indicative of the results of operations or related effects on financial position that would have been attained had the specified transaction (or event) actually occurred</p>

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

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<p><i>l.</i> A description of the work performed as the basis for the practitioner’s conclusion. (Ref: par. .A82A81–.A84A83)</p>	<p>earlier.³ When not explicitly required by an AT-C section, identification in the report of inherent limitations is based on the practitioner’s judgment.</p> <p><i>Description of the Work Performed (Ref: par. .46A71)</i> .A82-A81 The summary of the work performed helps the intended users understand the basis for the practitioner’s conclusion. The summary may be as brief as “the procedures we performed were based on our professional judgment and consisted primarily of analytical procedures and inquiries” or may be more detailed. Factors to consider in determining the level of detail to be provided in the summary of the work performed may include the following:</p> <ul style="list-style-type: none"> • Circumstances specific to the entity (for example, the differing nature of the entity’s activities compared to those typical in the industry) • Specific engagement circumstances affecting the nature and extent of the procedures performed • The intended users’ expectations of the level of detail to be provided in the report, based on market practice, or applicable law or regulation <p>.A83-A82 It is important that the summary be written in an objective way that allows intended users to understand the work done as the basis for the practitioner’s conclusion. In most cases, this will not involve detailing the entire work plan. On the other hand, it is important that the description of the work neither be so summarized as to be vague or ambiguous, nor written in a way that is overstated or embellished.</p>

³ Paragraph .18k and examples 2 and 3 in paragraph .A24 of AT-C section 310, *Reporting on Pro Forma Financial Information*.

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<p>m. The practitioner's conclusion about whether, based on the limited assurance engagement review, the practitioner is aware of any material modifications that should be made to (Ref: par. .A85A84-.A87A86)</p> <p>i. the subject matter in order for it be in accordance with (or based on) the criteria or</p> <p>ii. the responsible party's assertion in order for it to be fairly stated.</p> <p>n. The manual or printed signature of the practitioner's firm.</p>	<p>.A84A83 The exhibit to this section includes examples of practitioner's limited assurance review reports including summaries of procedures performed.</p> <p>Conclusion (Ref: par. .46m47m)</p> <p>.A85A84 The practitioner's conclusion can be worded either in terms of the subject matter and the criteria (for example, "Based on our limited assurance engagement review, we are not aware of any material modifications that should be made to the XYZ schedule in order for it to be in accordance with [or based on] the ABC criteria.") or in terms of an assertion made by the responsible party (for example, "Based on our limited assurance engagement review, we are not aware of any material modifications that should be made to management of XYZ Company's assertion in order for it to be fairly stated.").</p> <p>.A86A85 A single practitioner's report may cover more than one aspect of a subject matter or an assertion about the subject matter. When that is the case, the report may contain separate opinions or conclusions on each aspect of the subject matter or assertion (for example, examination level related to some aspects or assertions and limited assurance review level related to others, or an unmodified conclusion on some aspects or assertions and a modified conclusion on others).</p> <p>.A87A86 A practitioner may report on subject matter or an assertion at multiple dates or covering multiple periods during which criteria have changed (for example, a practitioner's report on comparative information). Criteria are clearly described when they identify the criteria for each period and how the criteria have changed from one period to the next. If the criteria for the current date or period have changed from the criteria for a preceding date or period, changes in the</p>

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<p>o. The city and state where the practitioner practices. (Ref: par. A88A87)</p> <p>p. The date of the report. The report should be dated no earlier than the date on which the practitioner has obtained sufficient appropriate limited assurance review evidence on which to base the practitioner's conclusion, including evidence that (Ref: par. A89A88-A90A89)</p> <ul style="list-style-type: none"> i. the attestation documentation has been reviewed, ii. if applicable, the written presentation of the subject matter has been prepared, and iii. the appropriate <u>responsible</u> party has provided all necessary representations. iv. <u>if applicable, the responsible party has provided a written assertion.</u> 	<p>criteria may be significant to users of the report. If so, the criteria and the fact that they have changed may be disclosed in the presentation of the underlying subject matter, if applicable, in the written assertion, or in the report, even if the subject matter for the preceding date or period is not presented.</p> <p>Location (Ref: par. .46o47o) .A88-A87 In the United States, the location of the issuing office is the city and state. In another country, it may be the city and country.</p> <p>Date (Ref: par. .46p47p) .A89-A88 Including the date of the practitioner's report informs the intended users that the practitioner has considered the effect <u>of the events that occurred up to that date</u> on the subject matter and on the report of events that occurred up to that date.</p> <p>.A90-A89 Because the practitioner expresses a conclusion on the subject matter or assertion and the subject matter or assertion is the responsibility of the responsible party, the practitioner is not in a position to conclude that sufficient appropriate limited assurance review evidence has been obtained until evidence is obtained that all the elements that the subject matter or assertion comprises, including any related notes, when applicable, have been prepared, and the responsible party has accepted responsibility for them.</p>

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<p><u>.47-48</u> <i>Restricted-Use Paragraph</i> In the following circumstances, the practitioner's report should include an alert, in a separate paragraph, that restricts the use of the report: (Ref: par. .A91A90-.A93A92)</p> <p>a. The practitioner determines that the criteria used to evaluate the subject matter are appropriate only for a limited number of parties who either participated in their establishment or can be presumed to have an adequate understanding of the criteria.</p> <p>b. The criteria used to evaluate the subject matter are available only to specified parties.</p> <p>c. The criteria are designed for a specific purpose.</p>	<p><u>.A91-A90</u> <i>Restricted-Use Paragraph (Ref: par. .47-48 and .48b49b-c)</i> A practitioner's report for which the conditions in paragraph .47-48 do not apply need not include an alert that restricts its use. However, nothing in the attestation standards precludes a practitioner from including such an alert in any practitioner's report or other practitioner's written communication.</p> <p><u>.A92-A91</u> A practitioner's report that is required by paragraph .47-48 to include an alert that restricts the use of the report may be included in a document that also contains a practitioner's report that is for general use. In such circumstances, the use of the general use report is not affected.</p> <p><u>.A93-A92</u> A practitioner may also issue a single combined practitioner's report that includes</p> <p style="padding-left: 40px;">(a) a practitioner's report that is required by paragraph .47-48 to include an alert that restricts its use and</p> <p style="padding-left: 40px;">(b) a report that is for general use.</p> <p>If these two types of reports are clearly differentiated within the combined report, such as through the use of appropriate headers <u>headings</u>, the alert that restricts the use of the report may be limited to the report required by paragraph .47-48 to include such an alert. In such circumstances, the use of the general use report is not affected.</p>
<p><u>.48-49</u> The alert should</p> <p>a. state that the practitioner's report is intended solely for the information and use of the specified parties,</p>	

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<p>b. identify the specified parties for whom use is intended, and (Ref: par. .A94<u>A93</u>)</p> <p>c. state that the report is not intended to be, and should not be, used by anyone other than the specified parties. (Ref: par. .A95<u>A94</u>–.A97<u>A96</u>)</p>	<p>.A94<u>A93</u> The practitioner may identify the specified parties by naming them, referring to a list of those parties, or identifying the class of parties, for example, "all customers of XYZ Company during some or all of the period January 1, 20XX, to December 31, 20XX." The method of identifying the specified parties is determined by the practitioner.</p> <p>.A95<u>A94</u> In some cases, the criteria used to measure or evaluate the subject matter may be designed for a specific purpose. For example, a regulator may require certain entities to use particular criteria designed for regulatory purposes. To avoid misunderstandings, the practitioner alerts users of the practitioner's report to this fact and, therefore, that the report is intended solely for the information and use of the specified parties.</p> <p>.A96<u>A95</u> The alert that restricts the use of the practitioner's report is designed to avoid misunderstandings related to the use of the report, particularly if the report is taken out of the context in which the report is intended to be used. A practitioner may consider informing the responsible party and, if different, the engaging party or other specified parties that the report is not intended for distribution to parties other than those specified in the report. The practitioner may, in connection with establishing the terms of the engagement, reach an understanding with the responsible party or, if different, the engaging party that the intended use of the report will be restricted, and may obtain the responsible party's agreement that the responsible party and specified parties will not distribute such report to parties other than those identified therein. A practitioner is not responsible for controlling, and cannot control, distribution of the report after its release.</p> <p>.A97<u>A96</u> In some cases, a restricted-use practitioner's report filed with regulatory agencies is required by law or regulation to be made available to the public as a matter of public record. Also, a regulatory agency, as</p>

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	part of its oversight responsibility for an entity, may require access to a restricted-use report in which it is not named as a specified party.
<p>.49-50 When the engagement is also performed in accordance with <i>Government Auditing Standards</i>, the alert that restricts the use of the practitioner's report should include the following information, rather than the information required by paragraph .48-49 should not be used. Instead, the alert required by paragraph .47 should include:</p> <p>a. a description of the purpose of the report and</p> <p>b. a statement that the report is not suitable for any other purpose.</p>	
Reference to the Practitioner's Specialist	Reference to the Practitioner's Specialist (Ref: par. .5051)
.50-51 The practitioner should not refer to the work of a practitioner's specialist in the practitioner's report containing an unmodified conclusion. (Ref: par. .A98A97)	.A98-A97 The practitioner has sole responsibility for the conclusion expressed, and that responsibility is not reduced by the practitioner's use of the work of a practitioner's specialist.
Modified Conclusions	Modified Conclusions (Ref: par. .5152-.52-53 and .5455)
Misstatement of Subject Matter	
.51-52 A practitioner who is engaged to perform a limited assurance engagement review may become aware that the subject matter is misstated. If the misstatement is not corrected, the practitioner should consider whether modification of the standard practitioner's report is sufficient to address the misstatement of the subject matter. (Ref: par. .A99A98-A100)	<p>.A99 The two types of modified conclusions are a qualified conclusion and an adverse conclusion. The decision regarding what type of modified conclusion is appropriate depends on the following:</p> <p>a. The nature of the matter giving rise to the modification (that is, whether the subject matter of the engagement is in accordance with [or based on] the criteria or may be materially misstated)</p> <p>b. The practitioner's professional judgment about the pervasiveness of the effects or possible effects of the matter on the subject matter of the engagement</p> <p>.A100-A98 A practitioner may express an unmodified conclusion only when the engagement has been conducted in accordance with the</p>

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	attestation standards. Such standards will not have been complied with if the practitioner has been unable to apply all the procedures that the practitioner considers necessary in the circumstances.
.52-53 The practitioner should express a modified conclusion when, in the practitioner's professional judgment, the subject matter is materially misstated. In such cases, the practitioner should express a qualified conclusion or adverse conclusion . (Ref: par. .A101A99)	<p>.A101-A99 An Eexamples of a qualified and adverse conclusions are is as follows:</p> <ul style="list-style-type: none"> • Qualified conclusion. "Based on the procedures performed and the evidence obtainedour review, except for the effect of the matter(s) described in [the Basis for Qualified Conclusion section of our report], we are not aware of any material modifications that should be made to [the subject matter] for it to be in accordance with [the criteria]nothing has come to our attention that causes us to believe that the [appropriate party's] statement does not present fairly, in all material respects." • Adverse conclusion (an example for a material and pervasive misstatement). "Because of the significance of the matter described in the Basis for Adverse Conclusion section of our report, the [appropriate party's] statement does not present fairly the entity's compliance with XYZ law."
.53-54 When the practitioner modifies the conclusion, the practitioner should include a separate paragraph in the practitioner's report that provides a description of the nature of the matter giving rise to the modification and, if practicable, includes the effects on the subject matter.	
.54-55 The practitioner should express a qualified conclusion when, in the practitioner's professional judgment, the effects of a matter are material but not pervasive. A qualified conclusion is expressed as being "except for" the effects of the matter to which the qualification relates. (Ref: par. .A102A100-A103A101)	<p>.A102-A100 The term <i>pervasive</i> describes the effects on the subject matter of misstatements. Pervasive effects on the subject matter are those that, in the practitioner's professional judgment</p> <p style="margin-left: 2em;">a. are not confined to specific aspects of the subject matter;</p>

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	<p>b. if so confined, represent or could represent a substantial proportion of the subject matter; or</p> <p>c. in relation to disclosures, are fundamental to the intended users' understanding of the subject matter.</p> <p>.A103 A101 The nature of the matter, and the practitioner's judgment about the pervasiveness of the effects on the subject matter, affect the type of conclusion to be expressed.</p>
.55. The practitioner should express an adverse conclusion when the practitioner, having obtained sufficient appropriate evidence, concludes that misstatements, individually or in the aggregate, are both material and pervasive to the subject matter. (Ref: par. .A102-.A103)	
.56 If the practitioner has concluded that conditions exist that, individually or in combination, result in one or more material misstatements based on the criteria, the practitioner should modify the conclusion and express a qualified or adverse conclusion directly on the subject matter, not on the assertion, even when the assertion acknowledges the misstatement.	
.57 The practitioner's conclusion on the subject matter or assertion should be clearly separated from any paragraphs emphasizing matters related to the subject matter or any other reporting responsibilities. Any- paragraphs emphasizing matters related to the subject matter or any other reporting responsibilities should be phrased in a manner that makes it clear that these paragraphs are not intended to detract from that conclusion.	
.58 When the conclusion is modified, reference to an external specialist is permitted when such reference is relevant to an understanding of the modification to the practitioner's conclusion. The practitioner should indicate in the practitioner's report that	

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such reference does not reduce the practitioner's responsibility for that conclusion.	
Scope Limitations	Scope Limitations (Ref: par. .59)
.59 If the practitioner is unable to obtain sufficient appropriate limited assurance review evidence, a scope limitation exists. When a scope limitation exists, the practitioner should withdraw from the engagement, when withdrawal is possible under applicable laws and regulations. (Ref: par. .A56-A55 and .A104-A102-.A105-A103)	.A104-A102 The procedures performed in a limited assurance engagement review engagement are, by definition, limited compared with those performed in an examination engagement. Limitations known to exist prior to accepting a limited assurance review engagement are a relevant consideration when establishing whether the preconditions for a limited assurance review engagement are present, in particular, whether the practitioner expects to be able to obtain the evidence needed to arrive at the practitioner's conclusion. (See AT-C section 105.) ⁴ If a further limitation is imposed by the <u>appropriate party</u> after a limited assurance review engagement has been accepted, it may be appropriate to withdraw from the engagement, when withdrawal is possible under applicable laws and regulations. .A105-A103 An inability to perform a specific procedure does not constitute a scope limitation if the practitioner is able to obtain sufficient appropriate limited assurance review evidence by performing alternative procedures.
Communication Responsibilities	Communication Responsibilities (Ref: par. .60)
.60 The practitioner should communicate to the responsible party known and suspected fraud and noncompliance with laws or regulations, as well as uncorrected misstatements. When the engaging party is not the responsible party, the practitioner should also communicate this information to the engaging party. (Ref: par. .A106-A104)	.A106-A104 Other matters that may be appropriate to communicate to the appropriate responsible party <u>or, if different, the engaging party</u> , include deficiencies in internal control identified during the engagement or bias in the measurement, evaluation, or disclosure of the subject matter.
.61 If the practitioner has identified or suspects noncompliance with laws or regulations that are not relevant to the subject matter, <u>the practitioner should determine whether the practitioner has a</u>	.A105 The practitioner's professional duty to maintain the confidentiality of client information may preclude the practitioner from reporting identified or suspected noncompliance with laws or

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⁴ Paragraph .25ciii of AT-C section 105, *Concepts Common to All Attestation Engagements*.

Proposed AT-C Section 210, <i>Limited Assurance Review Engagements</i>	
Introduction, Objectives, Definitions, and Requirements	Application and Other Explanatory Material
<p><u>responsibility to report the identified or suspected noncompliance to parties other than the responsible party and the engaging party (if different). (Ref: par. .A105-.A106)</u></p>	<p><u>regulations that is not relevant to the subject matter to a party other than the responsible party and, if different, the engaging party. However, the practitioner's legal responsibilities may vary by jurisdiction, and in certain circumstances, the duty of confidentiality may be overridden by statute, the law, or courts of law. In the following circumstances, a duty to notify parties outside the entity may exist:</u></p> <ul style="list-style-type: none"> <u>• In response to a court order</u> <u>• In compliance with requirements for examinations of entities that receive financial assistance from a government agency</u> <p><u>Because potential conflicts with the practitioner's ethical and legal obligations for confidentiality may be complex, the practitioner may consult with legal counsel before discussing noncompliance with parties outside the entity.</u></p> <p><u>.A106 If the practitioner is performing a review engagement in accordance with <i>Government Auditing Standards</i>, the practitioner may be required to report on compliance with laws, regulations, and provisions of contracts or grant agreements as part of the review. The practitioner may also be required to communicate instances of noncompliance to appropriate oversight bodies and funding agencies.</u></p>
<p>Documentation</p> <p>.61-62 The practitioner should prepare engagement documentation that is sufficient to determine the following: (Ref: par. .A107-.A110)</p> <p style="margin-left: 20px;">a. The nature, timing, and extent of the procedures performed to comply with relevant AT-C sections and applicable legal and regulatory requirements, including the following:</p> <p style="margin-left: 40px;">i. The identifying characteristics of the specific items or matters tested</p>	<p>Documentation (Ref: par. .61-62)</p> <p>.A107 Documentation includes a record of the practitioner's reasoning on all significant findings or issues that require the exercise of professional judgment and related conclusions. The existence of difficult questions of principle or professional judgment calls for the documentation to include the relevant facts that were known by the practitioner at the time the conclusion was reached.</p> <p>.A108 It is neither necessary nor practical to document every matter considered, or professional judgment made, during an engagement. Further, it is unnecessary for the practitioner to document separately (as</p>

Commented [MG46]: From 205.

Proposed AT-C Section 210, <i>Limited Assurance Review Engagements</i>	
Introduction, Objectives, Definitions, and Requirements	Application and Other Explanatory Material
<p>ii. Who performed the engagement work and the date such work was completed</p> <p>iii. The discussions with the responsible party or others about findings or issues that, in the practitioner's professional judgment, are significant, including the nature of the significant findings or issues discussed, and when and with whom the discussions took place</p> <p>iv. When one or more of the requested written representations have not been provided or the practitioner concludes that there is sufficient doubt about the competence, integrity, ethical values, or diligence of those providing the written representations, or that the written representations are otherwise not reliable, the matters in paragraph .38-39</p> <p>v. When the engaging party is not the responsible party and the responsible party will not provide the written representations regarding the matters in paragraph .3435, the oral responses from the responsible party to the practitioner's inquiries regarding the matters in paragraph .34-35</p> <p>vi. Who reviewed the engagement work performed and the date and extent of such review</p> <p>vii. If the practitioner identified information that is inconsistent with the practitioner's final conclusion regarding a significant finding or issue, how the practitioner addressed the inconsistency</p>	<p>in a checklist) compliance with matters for which compliance is demonstrated by documents included in the engagement file. Similarly, the practitioner need not include in the engagement file superseded drafts of working papers, notes that reflect incomplete or preliminary thinking, previous copies of documents corrected for typographical or other errors, and duplicates of documents.</p> <p>.A109 In applying professional judgment to assess the extent of documentation to be prepared and retained, the practitioner may consider what is necessary to provide an experienced practitioner, having no previous connection with the engagement, with an understanding of the work performed and the basis of the principal decisions made.</p> <p>.A110 Documentation ordinarily includes a record of the following:</p> <ul style="list-style-type: none"> • Issues identified with respect to compliance with relevant ethical requirements and how they were resolved • Conclusions on compliance with independence requirements that apply to the engagement and any relevant discussions with the firm that support these conclusions • Conclusions reached regarding the acceptance and continuance of client relationships and attestation engagements • The nature and scope of, and conclusions resulting from, consultations undertaken during the course of the engagement

Commented [MG47]: This is different than the corresponding requirement in 205.

Proposed AT-C Section 210, <i>Limited Assurance</i> Review Engagements	
Introduction, Objectives, Definitions, and Requirements	Application and Other Explanatory Material
<p><i>b.</i> The results of the procedures performed and the limited assurance<u>review</u> evidence obtained</p> <p>.62 If, in circumstances such as those described in paragraph .33<u>34</u>, the practitioner performs new or additional procedures or draws new conclusions after the date of the practitioner's report, the practitioner should document the following:</p> <p><i>a.</i> The circumstances encountered</p> <p><i>b.</i> The new or additional procedures performed, <u>review</u> evidence obtained, and conclusions reached and their effect on the report</p> <p><i>c.</i> When and by whom the resulting changes to the documentation were made and reviewed</p>	

.A111

Exhibit—Illustrative Practitioner’s ~~Limited Assurance~~Review Reports

The illustrative practitioner’s ~~limited assurance~~review reports in this exhibit meet the applicable reporting requirements in paragraphs .4344-.59. A practitioner may use alternative language in drafting a ~~limited assurance~~review report, provided that the language meets the applicable requirements in paragraphs .4344-.59.

Example 1: Practitioner’s ~~Limited Assurance~~Review Report on Subject Matter; Unmodified Conclusion

The following is an illustrative practitioner’s ~~limited assurance~~review report in which the practitioner has performed a ~~limited assurance engagement~~review on the subject matter and is reporting on the subject matter.

Independent Accountant’s ~~Limited Assurance~~ Report

[Appropriate Addressee]

We have undertaken a ~~limited assurance engagement~~review of [identify the subject matter, for example, the accompanying schedule of investment returns of XYZ Company for the year ended December 31, 20XX]. XYZ Company’s management is responsible for the preparation of [identify the subject matter, for example, presenting the schedule of investment returns] in accordance with (or based on) [identify the criteria, for example, the ABC criteria set forth in Note 1 or if only the practitioner has measured or evaluated the subject matter against the criteria, is responsible for the subject matter]. Our responsibility is to express a conclusion on [identify the subject matter, for example, the schedule of investment returns] based on our ~~limited assurance engagement~~review.

Commented [MG48]: Consistent with 205

We conducted our ~~limited assurance engagement~~review in accordance with attestation standards established by the American Institute of Certified Public Accountants. Those standards require that we plan and perform the ~~engagement~~review to obtain limited assurance about whether any material modifications should be made to [identify the subject matter, for example, the schedule of investment returns] in order for it to be in accordance with (or based on) the criteria.

The procedures performed in a ~~limited assurance engagement~~review vary in nature and timing from, and are substantially less in extent than an examination, the objective of which is to obtain reasonable assurance about whether [identify the subject matter, for example, the schedule of investment returns] is in accordance with (or based on) the criteria, in all material respects, in order to express an opinion. Accordingly, we do not express such an opinion. As a consequence of the limited nature of the engagement, the level of assurance obtained in a ~~limited assurance engagement~~review is substantially lower than the assurance that would have been obtained had an examination been performed. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our conclusion.

We are ~~required to be~~ independent of XYZ Company and ~~have fulfilled to meet~~ our other ethical responsibilities, in accordance with ~~the~~ relevant ethical requirements relating to ~~the engagement~~our review.

Commented [MG49]: To be consistent with ballot draft of Auditor Reporting suite

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

The procedures we performed were based on our professional judgment and included *[for example, inquiries, inspection of documents, analytical procedures, and agreeing or reconciling with underlying records]*.

[The practitioner may insert a summary of the nature and extent of procedures performed that, in the practitioner's judgment, provides additional information that may be relevant to the users' understanding of the basis for the practitioner's conclusion.]

[Additional paragraph(s) may be added to emphasize certain matters relating to the attestation engagement or the subject matter.]

Based on our ~~limited assurance engagement~~review, we are not aware of any material modifications that should be made to *[identify the subject matter, for example, the accompanying schedule of investment returns of XYZ Company for the year ended December 31, 20XX]*, in order for it be in accordance with (or based on) *[identify the criteria, for example, the ABC criteria set forth in Note I]*.

[Practitioner's signature]
[Practitioner's city and state]
[Date of practitioner's report]

Example 2: Practitioner's ~~Limited Assurance~~Review Report on an Assertion; Unmodified Conclusion; Use of the Report is Restricted to Specified Parties

The following is an illustrative practitioner's ~~review~~ report ~~for a limited assurance engagement~~ in which the practitioner has performed a ~~limited assurance engagement~~review on the responsible party's assertion and is reporting on that assertion. Although suitable criteria exist for the subject matter, use of the report is restricted to specified parties because the criteria are available only to the specified parties.

Independent Accountant's ~~Limited Assurance~~ Report

[Appropriate Addressee]

We have undertaken a ~~limited assurance engagement~~review of management of XYZ Company's assertion that *[identify the assertion, including the subject matter and the criteria, for example, the accompanying schedule of investment returns of XYZ Company for the year ended December 31, 20XX, is presented in accordance with (or based on) the ABC criteria set forth in Note I]*. XYZ

Company's management is responsible for its assertion. Our responsibility is to express a conclusion on management's assertion based on our ~~limited assurance engagement~~review.

We conducted our ~~limited assurance engagement~~review in accordance with attestation standards established by the American Institute of Certified Public Accountants. Those standards require that we plan and perform the ~~engagement~~review to obtain limited assurance about whether any material modifications should be made to management's assertion in order for it to be fairly stated.

The procedures performed in a ~~limited assurance engagement~~review vary in nature and timing from, and are substantially less in extent than an examination, the objective of which is to obtain reasonable assurance about whether management's assertion is fairly stated, in all material respects, in order to express an opinion. Accordingly, we do not express such an opinion. As a consequence of the limited nature of the engagement, the level of assurance obtained in a ~~limited assurance engagement~~review is substantially lower than the assurance that would have been obtained had an examination been performed. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our conclusion.

We are required to be independent of XYZ Company and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements relating to our review.
~~We are independent and have fulfilled our other ethical responsibilities in accordance with relevant ethical requirements relating to the engagement.~~

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

The procedures we performed were based on our professional judgment and included *[for example, inquiries, inspection of documents, analytical procedures, and agreeing or reconciling with underlying records]*.

[The practitioner may insert a summary of the nature and extent of procedures performed that, in the practitioner's judgment, provides additional information that may be relevant to the users' understanding of the basis for the practitioner's conclusion.]

[Additional paragraph(s) may be added to emphasize certain matters relating to the attestation engagement or the subject matter.]

Based on our ~~limited assurance engagement~~review, we are not aware of any material modifications that should be made to management of XYZ Company's assertion in order for it to be fairly stated.

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

[Practitioner's signature]

[Practitioner's city and state]

[Date of practitioner's report]

Example 3: Practitioner's ~~Limited Assurance~~ Review Report on Subject Matter; Qualified Conclusion

The following is an illustrative practitioner's review report ~~for a limited assurance engagement~~ in which the practitioner expresses a qualified conclusion because the ~~limited assurance engagement~~ review identified conditions that, individually or in combination, result in one or more material, but not pervasive, misstatements of the subject matter, based on the criteria. The practitioner has performed a ~~limited assurance engagement~~ review on the subject matter and is also reporting on the subject matter. Paragraph .56 states, "If the practitioner has concluded that conditions exist that, individually or in combination, result in one or more material misstatements based on the criteria, the practitioner should express a qualified ~~or adverse~~ conclusion directly on the subject matter, not on the assertion, even when the assertion acknowledges the misstatement."

Independent Accountant's ~~Limited Assurance~~ Report

[Appropriate Addressee]

We have undertaken a ~~limited assurance engagement~~ review of [identify the subject matter, for example, the accompanying schedule of investment returns of XYZ Company for the year ended December 31, 20XX]. XYZ Company's management is responsible for the preparation of [identify the subject matter, for example, presenting the schedule of investment returns] based on [identify the criteria, for example, the ABC criteria set forth in Note 1 ~~or if only the practitioner has measured or evaluated the subject matter against the criteria, is responsible for the subject matter~~]. Our responsibility is to express a conclusion on [identify the subject matter, for example, the schedule of investment returns] based on our ~~limited assurance engagement~~ review.

Commented [MG50]: Consistent with 205.

We conducted our ~~limited assurance engagement~~ review in accordance with attestation standards established by the American Institute of Certified Public Accountants. Those standards require that we plan and perform the ~~engagement~~ review to obtain limited assurance about whether any material modifications should be made to [identify the subject matter, for example, the schedule of investment returns] in order for it to be in accordance with (or based on) the criteria.

The procedures performed in a ~~limited assurance engagement~~ review vary in nature and timing from, and are substantially less in extent than an examination, the objective of which is to obtain reasonable assurance about whether management's assertion is fairly stated, in all material respects, in order to express an opinion. Accordingly, we do not express such an opinion. As a consequence of the limited nature of the engagement, the level of assurance obtained in a ~~limited assurance engagement~~ review is substantially lower than the assurance that would have been obtained had an examination been performed. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our conclusion.

We are required to be independent of XYZ Company and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements relating to our review.

~~We are independent and have fulfilled our other ethical responsibilities in accordance with relevant ethical requirements relating to the engagement.~~

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

The procedures we performed were based on our professional judgment and included *[for example, inquiries, inspection of documents, analytical procedures, and agreeing or reconciling with underlying records]*.

[The practitioner may insert a summary of the nature and extent of procedures performed that, in the practitioner's judgment, provides additional information that may be relevant to the users' understanding of the basis for the practitioner's conclusion.]

[Additional paragraph(s) may be added to emphasize certain matters relating to the attestation engagement or the subject matter.]

Our ~~limited assurance engagement~~ review identified *[describe condition(s) that, individually or in the aggregate, resulted in a material misstatement, or deviation from, the criteria]*.

Based on our ~~limited assurance engagement~~ review, except for the matter(s) described in the preceding paragraph, we are not aware of any material modifications that should be made to *[identify the subject matter, for example, the accompanying schedule of investment returns of XYZ Company for the year ended December 31, 20XX]*, in order for it to be in accordance with (or based on) *[identify the criteria, for example, the ABC criteria set forth in Note 1]*.

[Practitioner's signature]

[Practitioner's city and state]

[Date of practitioner's report]

Example 4: Practitioner's ~~Limited Assurance~~ Review Report on a Greenhouse Gas (GHG) Statement; Unmodified Conclusion

Independent Practitioner's ~~Limited Assurance~~ Report on XYZ Company's Greenhouse Gas (GHG) Statement

[Appropriate Addressee]

We have undertaken a ~~limited assurance engagement~~ review with respect to the accompanying Greenhouse Gas (GHG) Emissions Statement (GHG Statement) of XYZ Company for the year ended December 31, 20X1, comprising the Emissions Inventory [and Explanatory Notes on pages xx-yy]. XYZ Company is responsible for the preparation of the GHG Statement in accordance with the criteria set forth in Note 1 (the criteria). Our responsibility is to express a conclusion on the GHG Statement based on our ~~limited assurance engagement~~ review.

We conducted our ~~limited assurance engagement review~~ in accordance with attestation standards established by the American Institute of Certified Public Accountants. Those standards require that we plan and perform the ~~engagement review~~ to obtain limited assurance about whether any material modifications should be made to the GHG Statement in order for it to be in accordance with the criteria.

The procedures performed in a ~~limited assurance engagement review~~ vary in nature and timing from, and are substantially less in extent than, an examination, the objective of which is to obtain reasonable assurance about whether management's assertion is fairly stated, in all material respects, in order to express an opinion. Accordingly, we do not express such an opinion. As a consequence of the limited nature of the engagement, the level of assurance obtained in a ~~limited assurance engagement review~~ is substantially lower than the assurance that would have been obtained had an examination been performed. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our conclusion.

We are required to be independent of XYZ Company and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements relating to our review.

~~We are independent and have fulfilled our other ethical responsibilities in accordance with relevant ethical requirements relating to the engagement.~~

As discussed in Note 1 to the GHG Statement, GHG quantification is subject to inherent uncertainty because of incomplete scientific knowledge used to determine emissions factors and the values needed to combine emissions of different gases.

The procedures we performed were based on our professional judgment and included inquiries, observation of processes performed, inspection of documents, analytical procedures, evaluating the appropriateness of quantification methods and reporting policies, and agreeing or reconciling with underlying records.

[The practitioner may insert a summary of the nature and extent of procedures performed that, in the practitioner's judgment, provides additional information that may be relevant to the users' understanding of the basis for the practitioner's conclusion. The following section has been provided as guidance, and the example procedures are not an exhaustive list of either the type, or extent, of the procedures which may be important for the users' understanding of the work done.]

Given the circumstances of the engagement, in performing the procedures listed above, we

- through inquiries, obtained an understanding of XYZ's control environment and information systems relevant to emissions quantification and reporting, but did not evaluate the design of particular control activities, obtain evidence about their implementation, or test their operating effectiveness.
- reviewed whether XYZ's methods for developing estimates are appropriate and had been consistently applied. However, our procedures did not include testing the data on which

the estimates are based on separately developing our own estimates against which to evaluate XYZ's estimates.

- undertook site visits [at three sites] to test the completeness of the emissions sources, data collection methods, source data, and relevant assumptions applicable to the sites. The sites selected for testing were chosen taking into consideration their emissions in relation to total emissions, emissions sources, and sites selected in prior periods. Our procedures [did/did not] include testing information systems to collect and aggregate facility data, or the controls at these sites.

Based on our ~~limited assurance engagement review~~, we are not aware of any material modifications that should be made to XYZ Company's GHG Statement for the year ended December 31, 20X1, in order for it to be in accordance with the criteria applied as explained in Note 1 to the GHG Statement.

[Practitioner's signature]

[Practitioner's city and state]

[Date of practitioner's report]

Example 5: Practitioner's ~~Limited Assurance~~ Review Report on Corporate Responsibility Report; Qualified Conclusion

Independent Practitioner's ~~Limited Assurance~~ Report on Corporate Responsibility Report

[Appropriate Addressee]

We have undertaken a ~~limited assurance engagement review~~ of the accompanying Corporate Responsibility Report (the report) of ABC Company for the year ended July 31, 20X1.

ABC Company's Responsibility for the Report

ABC Company is responsible for the preparation of the report in accordance with ABC Company's Corporate Responsibility Reporting Guidance 20X1 as set out at www.abccompany.com (the reporting criteria) and for selecting and developing the reporting criteria. This responsibility includes the design, implementation, and maintenance of internal control relevant to the preparation of a report that is free from material misstatement, whether due to fraud or error.

The nature of non-financial information; the absence of a significant body of established practice on which to draw; and the methods and precision used to measure non-financial information, allow for different, but acceptable evaluation and measurement techniques and can result in materially different measurements, affecting comparability between entities and over time.

Our Responsibility

Our responsibility is to express a conclusion on the report based on our ~~limited assurance engagement review~~. We conducted our ~~limited assurance engagement review~~ in accordance with attestation standards established by the American Institute of Certified Public Accountants. Those standards require that we plan and perform ~~this engagement~~ the review to obtain limited assurance

about whether any material modifications should be made to the report in order for it to be in accordance with the reporting criteria.

~~We are required to be independent of XYZ Company and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements relating to our review.~~

~~We have complied with the independence and other ethical requirements of the Code of Professional Conduct established by the AICPA.~~

We applied the Statements on Quality Control Standards established by the AICPA and, accordingly, maintain a comprehensive system of quality control.

The procedures performed in a ~~limited assurance engagement review~~ vary in nature and timing from, and are substantially less in extent than, an examination, the objective of which is to obtain reasonable assurance about whether management's assertion is fairly stated, in all material respects, in order to express an opinion. Accordingly, we do not express such an opinion. As a consequence of the limited nature of the engagement, the level of assurance obtained in a ~~limited assurance engagement review~~ is substantially lower than the assurance that would have been obtained had an examination been performed. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our conclusion.

Basis for Qualified Conclusion

A significant portion of the non-hazardous waste figure of 320,000 tons set out in the report on page X is calculated using an estimation methodology. Due to the nature of ABC Company's waste data measurement procedures and records in the year ended July 31, 20X1, we were unable to obtain sufficient appropriate evidence to assess whether the estimation methodology is a reasonable basis for the determination of the non-hazardous waste figure. Consequently, we were unable to determine whether the non-hazardous waste figure has been properly prepared in accordance with the reporting criteria.

Limited Assurance Review Conclusion

Based on our ~~limited assurance review~~ engagement, except for the possible effects of the matter described in the Basis for Qualified Conclusion paragraph, we are not aware of any material modifications that should be made to ABC Company's report for the year ended July 31, 20X1, in order for it to be in accordance with the reporting criteria.

[Practitioner's signature]

[Practitioner's city and state]

[Date of practitioner's report]

~~Example 6: Practitioner's Limited Assurance Report on Sustainability Report; Adverse Conclusion~~

~~Independent Practitioner's Limited Assurance Report on Sustainability Report~~

~~*[Appropriate Addressee]*~~

~~We have undertaken a limited assurance engagement of the sustainability information in the sustainability report of ABC Company (the sustainability report) for the period January 1, 20X1, to December 31, 20X1.~~

ABC Company's Responsibility for the Sustainability Report

~~ABC Company is responsible for the preparation of the sustainability report in accordance with the criteria set forth in the G4 Sustainability Reporting Guidelines in the Global Reporting initiative (GRI) (the GRI criteria). This responsibility includes the design, implementation, and maintenance of internal control relevant to the preparation of a sustainability report that is free from material misstatement, whether due to fraud or error.~~

Our Responsibility

~~Our responsibility is to express a conclusion on the sustainability report based on our limited assurance engagement. We conducted our limited assurance engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. Those standards require that we plan and perform this engagement to obtain limited assurance about whether any material modifications should be made to the sustainability report in order for it to be in accordance with the GRI criteria.~~

~~We have complied with the independence and other ethical requirements of the Code of Professional Conduct established by the AICPA.~~

~~We applied the Statements on Quality Control Standards established by the AICPA and, accordingly, maintain a comprehensive system of quality control.~~

~~The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than, an examination, the objective of which is to obtain reasonable assurance about whether management's assertion is fairly stated, in all material respects, in order to express an opinion. Accordingly, we do not express such an opinion. As a consequence of the limited nature of the engagement, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had an examination been performed. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our conclusion.~~

Basis for Adverse Conclusion

~~ABC Company has not...~~

~~Had ABC Company properly accounted for... many elements in the sustainability report would have been materially affected. The effects on the sustainability report have not been determined.~~

Adverse Conclusion

~~Based on our limited assurance engagement, because of the significance of the matter described in the Basis for Adverse Conclusion section of our report, ABC Company's sustainability report is not in accordance with the GRI criteria.~~

~~[Practitioner's signature]~~

Marked ED Revisions to AT-C 210 May 2019
ASB Meeting, May 20-23, 2019

[Practitioner's city and state]
[Date of practitioner's report]