



Agenda Item 2D

Proposed AT-C Section 215, <i>Agreed-Upon Procedures Engagements</i>	
Introduction, Objectives, Definitions, and Requirements	Application and Other Explanatory Material
Introduction	Introduction (Ref: par. <u>.0302</u> and <u>.05</u>)
<p>.01 This section contains performance and reporting requirements and application guidance for all agreed-upon procedures engagements. 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>.02 An <i>agreed-upon procedures engagement</i> is one in which a practitioner is engaged to issue, or does issue, a practitioner's report of findings based on specific agreed-upon procedures applied to subject matter for use by specified parties. Because the specified parties require that findings be independently derived, the services of a practitioner are obtained to perform procedures and report the practitioner's findings. The specified parties determine subject matter may be financial or nonfinancial information. The procedures they believe to be appropriate to be applied by the practitioner. Because the needs of specified an engaging parties party may vary widely, the nature, timing, and</p>	<p>A1 Based on the nature of the engagement, the procedures may be applied to <i>subject matter</i> or <i>subject matter information</i> as those terms are defined in paragraph .10 of AT-C section 105, <i>Concepts Common to All Attestation Engagements</i>.</p> <p>A2 The procedures to be performed may be developed by the practitioner, the engaging party, another party, or a combination of these parties. Further, the procedures may be prescribed by law, regulation, or contract.</p>

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

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<p>extent of the <u>agreed-upon</u> procedures may vary, as well; <u>consequently, the specified procedures are, therefore, engagement specific and tailored to meet the engaging party's needs.</u> (Ref: par. A1-.A2)</p>	
<p><u>.03 Because the engaging party best understands its own needs, the engaging party is required to agree to the procedures and acknowledge that the procedures performed are appropriate for the intended purpose of the engagement prior to issuance of the practitioner's agreed-upon procedures report. Engagement circumstances may be such that it is appropriate for additional parties to acknowledge that the procedures performed are appropriate for their purposes. parties assume responsibility for the sufficiency of the procedures because they best understand their own needs. The engaging party and intended users assess for themselves the procedures and findings reported by the practitioner and draw their own conclusions from the work performed by the practitioner.</u></p>	
<p><u>.04 In an engagement performed underin accordance with this section, the practitioner does not perform an examination or a review and does not provide an opinion or conclusion. Instead, the agreed-upon procedures report on agreed-upon procedures is in the form of procedures and findings.</u></p>	
<p><u>.03-05 When a practitioner performs services pursuant to an engagement to apply agreed-upon procedures to subject matter as part of or in addition to another form of service, this section applies only to those services described herein; other professional standards would apply to the other services. Other services may include an audit, review, or compilation of a financial statement, another attestation service performed pursuant to the attestation standards, or a nonattestationnonattest service. A practitioner's report on applying agreed-upon procedures to subject matter may be combined with a report on such other services, provided the types of services can be clearly distinguished, and the applicable standards for each service are followed. (Ref: par. A1A3)</u></p>	<p><u>.A1 A practitioner may issue a single combined practitioner's report that includes (a) a practitioner's report on subject matter or a presentation that requires a restriction on use to specified parties and (b) a report on subject matter or a presentation that ordinarily does not require such a restriction. The use of such a single combined report may be restricted to the specified parties. In some instances, a separate restricted use report may be included in a document that also contains a general use report. The inclusion of a separate restricted use report in a document that contains a general use report does not affect the intended use of either report. The restricted use report remains restricted as to use, and the general use report continues to be for general use.</u></p>

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	A3 As part of the agreed-upon procedures engagement, a practitioner may be engaged to develop, or assist in the development of, the procedures to be performed.
.04-06 This section does not apply to engagements to issue letters (commonly referred to as <i>comfort letters</i>) to underwriters and certain other requesting parties. ¹	
Effective Date .0507 If issued as final, this section is will be effective for agreed-upon procedures reports dated on or after Month X, 2017. <u>July 15, 2021</u> . Early implementation is not permitted.	
Objectives	Objectives (Ref: par. .6a-08a)
.0608 In conducting an agreed-upon procedures engagement, the objectives of the practitioner are to <ol style="list-style-type: none"> a. apply to do the following: <ol style="list-style-type: none"> a. Apply specific procedures to subject matter procedures that are established by specified parties who are responsible for the sufficiency of the procedures for their purposes. (Ref: par. .A2A4) b. Issue a written practitioner's report that describes the procedures applied and the practitioner's findings; and without providing an opinion or conclusion on the subject matter. c. Communicate further as required by relevant AT-C sections. 	.A2A4 In an agreed-upon procedures engagement, the practitioner applies procedures to the subject matter of the engagement. Even though the procedures are established by the specified parties, The requirements and guidance related to the subject matter and criteria in AT-C section 105 apply.
Definition .07 For purposes of this section, the following term has the meaning attributed as follows:	

¹ See AU-C section 920, *Letters for Underwriters and Certain Other Requesting Parties*, in [AICPA Professional Standards](#).

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Nonparticipant party. An additional specified party the practitioner is requested to add as a user of the practitioner's report subsequent to the completion of the agreed-upon procedures engagement. (The term <i>specified party</i> is defined in section 105. ²)	
Requirements	
Conduct of an Agreed-Upon Procedures Engagement	Conduct of an Agreed-Upon Procedures Engagement (Ref: par. .08, .09, .10, and 14d) .A3A5 For example, if a practitioner were performing <u>an</u> agreed-upon procedures <u>engagement</u> related to an entity's compliance with requirements of specified laws, regulations, rules, contracts, or grants, <u>AT-C</u> section 105, this section, and <u>AT-C</u> section 315, <i>Compliance Attestation</i> , would be relevant. <u>In addition, there may also be interpretative publications applicable to the subject matter such as, Statement of Position 17-1, Performing Agreed-Upon Procedures Related to Rated Exchange Act Asset-Backed Securities Third-Party Due Diligence Services As Defined by SEC Release No. 34-72936.</u>
	.A4 Although independence is required for agreed upon procedures engagements, the "Agreed Upon Procedures Engagements Performed in Accordance With SSAEs" interpretation (AICPA, <i>Professional Standards</i> , ET sec. 1.297.020,), establishes independence requirements unique to such engagements.
Preconditions for an Agreed-Upon Procedures Engagement	Preconditions for an Agreed-Upon Procedures Engagement (Ref: par. .10-.11) .A6 The "Agreed-Upon Procedure Engagements Performed in Accordance With SSAEs" interpretation (ET sec. 1.297.020) [‡] of the "Independence Rule" establishes independence requirements unique to agreed-upon procedures engagements.
.09-10 AT-C section 105 indicates that a practitioner must be independent when performing an attestation engagement in accordance with the attestation standards ₂ unless the practitioner is required by law or regulation to accept the engagement and report on the subject matter or assertion. ² When the practitioner is not independent but is required by law or regulation to accept an	

² Paragraph .10 of AT-C section 105, *Concepts Common to All Attestation Engagements*.

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

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<p>agreed-upon procedures engagement and report on the procedures performed and findings obtained, the practitioner's report should specifically state that the practitioner is not independent. The practitioner is neither required to provide, nor precluded from providing, the reasons for the lack of independence; however, if the practitioner chooses to provide the reasons for the lack of independence, the practitioner should include all the reasons therefor. (Ref: par. A6)</p>	
<p>.1011 In order to establish that the preconditions for an agreed-upon procedures engagement are present, the practitioner should determine that the following conditions, in addition to the preconditions identified in AT-C section 105, are present:³ (Ref: par..A5 – A6)</p> <ul style="list-style-type: none"> a. The specified parties agree on the procedures performed, or to be performed, by the practitioner. b. The specified parties take responsibility for the sufficiency of the agreed-upon procedures for their purposes. (Ref: par. A6) c. The practitioner determines that the procedures can be designed, performed, and reported on in accordance with this section in accordance with this section. (Ref: par. A7) d. The engaging party agrees, or will be able to agree, to the procedures and acknowledge that the procedures are appropriate for the intended purpose of the engagement. e. The procedures to be applied to the subject matter are expected to result in reasonably consistent findings using the criteria. f. When applicable, the practitioner agrees to apply any materiality limits established by the specified parties engaging party for reporting purposes. g. Use of the practitioner's report is to be restricted to the specified parties. 	<p>.A5 To satisfy the requirements that the specified parties agree upon, the procedures performed or to be performed, and that the specified parties take responsibility for the sufficiency of the agreed-upon procedures for their purposes, the practitioner ordinarily communicates directly with and obtains affirmative acknowledgment from each of the specified parties. For example, this may be accomplished by meeting with the specified parties or by distributing a draft of the anticipated practitioner's report or a copy of an engagement letter to the specified parties and obtaining their agreement. If the practitioner is not able to communicate directly with all the specified parties, the practitioner may satisfy these requirements by applying any one or more of the following or similar procedures:</p> <ul style="list-style-type: none"> – Compare the procedures to be applied to written requirements of the specified parties. – Discuss the procedures to be applied with appropriate representatives of the specified parties involved. – Review relevant contracts with or correspondence from the specified parties. <p>.A7 In determining whether procedures can be designed, performed, and reporting on in accordance with this section, the practitioner may consider whether such procedures:</p>

³ Paragraphs .25–30 of AT-C section 105.

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	<ul style="list-style-type: none"> • Are or will be subjective or require judgment to apply • Are or will not be selected to only result in findings that show the subject matter in a favorable light • Will meet the intended purpose of the engagement as well as the intended purpose of other parties to the engagement.
<p><u>.11</u> The practitioner should not accept an agreed upon procedures engagement when the specified parties do not agree upon the procedures performed, or to be performed, or do not take responsibility for the sufficiency of the procedures for their purposes. (See paragraphs .0-.35 for the requirements and related application guidance on satisfying these requirements when the practitioner is requested to add a nonparticipant party.) (Ref: par. A6)</p> <p><u>.12</u> The practitioner should establish an understanding with the engaging party regarding the nature of the engagement, including:</p> <p>a. The intended purpose of the engagement and the intended users of the agreed-upon procedures report; (Ref: par. A8-A9)</p> <p>b. Any law, regulation, or contract pursuant to which the engagement is to be performed; and (Ref: par. A10)</p>	<p>.A6 Specified parties are responsible for the sufficiency (nature, timing, and extent) of the agreed upon procedures because they best understand their own needs. The specified parties assume the risk that such procedures might be insufficient for their purposes. In addition, the specified parties assume the risk that they might misunderstand or otherwise inappropriately use findings properly reported by the practitioner.</p> <p><u>.A8</u> The intended purpose of the engagement is determined by the engaging party. Consideration of the intended purpose of the engagement and the intended users of the practitioner's agreed-upon procedures report informs the practitioner's judgments about whether it is practical or necessary to obtain the agreement of those users, and whether to restrict the use of the report as discussed in paragraphs .36-.37.</p> <p><u>.A9</u> The engagement may be required by law, regulation, or contract or may arise as a result of a request by a third party or the engaging party's intent to provide information to a broad class of users, such as customers.</p> <p><u>.A10</u> Law or regulation may require an agreed-upon procedures engagement to be performed (for example, to demonstrate compliance with requirements of specific laws or regulations). Further, the procedures to be performed may be prescribed by law, regulation, or contract. Regulatory expectations may also be set out</p>

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<p>c. whether parties in addition to the engaging party will be requested to acknowledge that the procedures performed are appropriate for their intended purposes. (Ref: par. A11-.A13)</p>	<p>as part of a regulatory audit or communications or requests from regulators. Law or regulation may prescribe the nature, timing, and extent of the procedures to be performed and, in some cases, the way the procedures or findings are to be described in the practitioner's report. In other circumstances, law or regulation may prescribe only the nature of the procedures to be performed, or may use uncertain terms lacking clarity that an agreed-upon procedures engagement is an acceptable service (for example, terms requiring an audit, review, examination, validation, or certification).</p> <p><u>A11</u> Based on the practitioner's understanding with the engaging party, the practitioner may consider it necessary to request a regulator to acknowledge that the procedures performed are appropriate for their intended purpose, particularly in the case of an initial engagement, where law or regulation prescribes only the nature of the procedures to be performed, or where there may be uncertainty as to whether an agreed-upon procedures engagement is an acceptable service.</p> <p><u>A12</u> A contract may require an agreed-upon procedures engagement to be performed. Given the procedures are being performed to satisfy the obligations or expectations of the parties to the contract, unless the procedures, or a detailed description of the nature of the procedures, are included in the contract, it may be necessary for all parties to the contract to acknowledge that the procedures performed are appropriate for their purposes.</p> <p><u>A13</u> As another example, a practitioner may be engaged to perform procedures relating to a securitization transaction. In such circumstances, the practitioner and engaging party may determine it is necessary for other parties, such as underwriters, to agree to the procedures.</p>

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<p>.13 The practitioner is precluded from accepting an agreed-upon procedures engagement if the practitioner believes the intended purpose of the engagement is not clear or the engaging party will not have a basis for acknowledging that the procedures are appropriate for the intended purpose of the engagement.</p>	
<p>Agreeing on the Terms of the Engagement</p>	<p>Agreeing on the Terms of the Engagement (Ref: par. .12–.15 and .14b and e)</p>
<p>.12–.14 The practitioner should agree upon the terms of the engagement with the engaging party. The agreed-upon terms of the engagement should be specified in sufficient detail in an engagement letter or other suitable form of written agreement. (Ref: par. .A7–.A14)</p>	<p>.A7–.A14 It is in the interests of both the engaging party and the practitioner to document the agreed-upon terms of the engagement before the commencement of the engagement to help avoid misunderstandings. The form and content of the engagement letter or other suitable form of written agreement will vary with the engagement circumstances.</p>
<p>.13 The agreement should be addressed to the engaging party.</p>	
<p>.14–.15 The agreed-upon terms of the engagement should include the following:</p> <ul style="list-style-type: none"> a. The nature of the engagement established pursuant to paragraph .12 b. Identification of the subject matter or assertion, and the responsible party, and the criteria to be used (Ref: par. .A8) c. Identification of specified parties d. Acknowledgment by the specified parties of their responsibility for the sufficiency of the procedures (Ref: par. .A6) e. The responsibilities of the practitioner (Ref: par. .A9–.A10 → .A15–.A16) f. A statement that the engagement will be conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants g. Agreement on procedures by enumerating (or referring to) the procedures 	<p>.A8 The criteria may be indicated in the procedures as opposed to being described separately.</p> <p>.A9–.A15 The responsibility of the practitioner is to carry out the procedures and report the findings in accordance with the attestation standards. The practitioner assumes the risk that misapplication of the procedures may result in inappropriate findings being reported. Furthermore, the practitioner assumes the risk that appropriate findings may not be reported or may be reported inaccurately. The practitioner's risks can be reduced through adequate planning and supervision and due professional care in performing the procedures, accumulating the findings, and preparing the practitioner's report.</p> <p>.A10–.A16 The practitioner has no responsibility to determine the differences between the agreed upon procedures to be performed and the procedures that the practitioner would have determined to be</p>

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<p>e. <u>A statement that the responsible party is responsible for the subject matter.</u> (Ref: par. .A17)</p> <p>f. <u>An acknowledgment that the engaging party agrees to provide the practitioner, prior to the completion of the engagement, with a written acknowledgment regarding the appropriateness of the procedures for the intended purpose of the engagement In circumstances in which parties in addition to the engaging party will be requested to acknowledge that the procedures are appropriate for their purposes and such parties are known at the onset of the engagement, the agreed-upon terms of the engagement should include an identification of such parties.</u> (Ref. A18).</p> <p>g. <u>An acknowledgment that the engaging party agrees to provide, at the conclusion of the engagement, a representation letter that, if applicable, will include a representation that the engaging party has obtained acknowledgment from all appropriate parties that the procedures are</u></p>	<p>necessary had the practitioner been engaged to perform another form of attestation engagement. The procedures that the practitioner <u>agrees to perform</u> <u>performs</u> pursuant to an agreed-upon procedures engagement may be more or less extensive than the procedures that the practitioner would determine to be necessary had he or she been engaged to perform another form of engagement.</p> <p>A17 There may be circumstances in which the party responsible for the subject matter is not a party to the engagement. For example, the practitioner may be engaged to perform procedures with respect to benchmarking certain information in which multiple entities may be responsible for certain aspects of the information, or the information may be publicly available, such as subject matter that appears on the internet or in a public building such as a grocery or retail store. If the practitioner is engaged to benchmark the prices of 10 products at 3 different stores on a certain date, each of the stores may be responsible for the source of the subject matter and the price that is published on the shelf.</p> <p>A18 If the procedures are prescribed or otherwise developed by parties other than the practitioner, the agreed-upon terms of the engagement may include the procedures to be performed</p>

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<p><u>appropriate for their purposes.</u></p> <p><u>h. If the engaging party is not the responsible party, a statement that written representations may be requested from the responsible party.</u></p> <p><u>i. Reference to the expected form and content of the practitioner's agreed-upon procedures report, including:</u></p> <p class="list-item-l1">1) <u>a description of the parties that will be identified as having acknowledged that the procedures are appropriate for their purposes and, if applicable, a statement that such additional parties have acknowledged that the procedures performed are appropriate for their purposes;</u></p> <p class="list-item-l1">2) <u>if the engaging party acknowledges that the procedures are appropriate for the intended purpose of the engagement, and no additional parties acknowledge that the procedures are appropriate for their purposes, a statement that no other party acknowledged that the procedures are appropriate for any purpose; and</u></p> <p class="list-item-l1">3) <u>a statement that the practitioner does not accept any responsibility for the appropriateness of the procedures for any purpose, unless the practitioner decides to accept responsibility for the appropriateness of the procedures.</u></p> <p><u>j. Disclaimers expected to be included in the practitioner's report, if applicable</u></p> <p><u>k. Use restrictions, if applicable</u></p> <p><u>jl. Assistance to be provided to the practitioner, if applicable</u></p> <p><u>km. Involvement of a practitioner's external specialist, if applicable</u></p> <p><u>l-n. Agreed upon Specified materiality limits specified by the specified parties, if applicable</u></p>	

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Requesting a Written Assertion <p>.15 The practitioner should request from the responsible party a written assertion about the measurement or evaluation of the subject matter against the criteria. (Ref: par. .A11 .A15)</p>	Requesting a Written Assertion (Ref: par. .15 .16) <p>.A11 Situations may arise in which the current responsible party was not present during some or all of the period covered by the practitioner's report. Such persons may contend that they are not in a position to provide a written assertion that covers the entire period because they were not in place during some or all of the period. This fact, however, does not diminish such persons' responsibilities for the subject matter as a whole. Accordingly, the requirement for the practitioner to request a written assertion from the responsible party that covers the entire relevant period(s) still applies.</p> <p>.A12 Paragraph .28a requires the practitioner to request a written representation from the responsible party that is the same as the responsible party's assertion. If the responsible party provides the practitioner with the written representation in paragraph .28a, the practitioner need not request a separate written assertion, unless a separate written assertion is called for by the engagement circumstances.</p> <p>.A13 In an agreed upon procedures engagement, the procedures that the practitioner is asked to perform frequently consist of comparing information from one source with information from another source to determine whether they agree. For that reason, the criteria identified in the assertion might be the agreement of one amount with another amount.</p> <p>.A14 The following are examples of assertions the responsible party might make related to accounts receivable in the engagement that results in the practitioner's report illustrated in example 2 of paragraph .A48:</p> <ul style="list-style-type: none"> • General ledger account 250, "Accounts Receivable," as of December 31, 20XX, accurately summarizes the accounts

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	<p>receivable aged trial balance, which accurately summarizes individual customer account balances as of that date.</p> <ul style="list-style-type: none"> • The accounts receivable subsidiary ledger as of December 31, 20XX accurately summarizes individual account balances in the aged trial balance of accounts receivable as of that date. • The aged trial balance of accounts receivable as of December 31, 20XX, accurately ages outstanding invoices in the accounts receivable subledger as of that date. • The accounts receivable trial balance as of December 31, 20XX, accurately summarizes amounts due from customers at that date. <p>Alternatively, a single assertion such as the following might be appropriate:</p> <ul style="list-style-type: none"> • The accounts receivable aged trial balance as of December 31, 20XX, accurately presents the general ledger balance and the amounts and ages of individual customer balances as of that date. • Additional assertions would be necessary for the engagement resulting in the report in example 2 of paragraph .A48, for example, an assertion about cash, or in the case of a single assertion, the assertion would need to be modified to address cash. <p>.A15 Paragraph .36 contains reporting requirements for situations in which the responsible party refuses to provide the practitioner with a written assertion.</p>
.16 If the engaging party is not the responsible party, and the practitioner is aware that the responsible party refuses to provide the practitioner with a written assertion, the written agreement required by paragraph .12 should make clear that no such assertion will be provided to the practitioner. (Ref: par. .A15)	

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Procedures to Be Performed	Procedures to Be Performed (Ref: par. .17-.15 and .19-.16-.17)
.17-.16 The practitioner should perform procedures designed to meet the intended purpose of the engagement <u>established with the engaging party pursuant to paragraph .12</u> , agreed upon pursuant to paragraph g should specify the nature, timing, and extent of the procedures. (Ref: par. .A16A19 -A20A23)	.A16-A19 The procedures that the practitioner and specified parties agree upon may be as limited or as extensive as the specified parties desire. However, mere reading of an assertion or specified information about the subject matter does not constitute a procedure sufficient to permit a practitioner to report on the results of applying agreed upon procedures.
	<p>.A17A20 Examples of appropriate procedures include the following:</p> <ul style="list-style-type: none"> a.-o. — Inspection of specified documents evidencing certain types of transactions or detailed attributes thereof b.-o. — Confirmation of specific information with third parties c.-o. — Comparison of documents, schedules, or analyses with certain specified attributes d.-o. — Performance of specific procedures on work performed by others e.-o. — Performance of mathematical computations
	<p>.A18A21 Examples of inappropriate procedures include the following:</p> <ul style="list-style-type: none"> f.-o. — Mere reading of the work performed by others solely to describe their findings g.-o. — Evaluating the competency or objectivity of another party h.-o. — Obtaining an understanding about a particular subject i.-o. — Interpreting documents outside the scope of the practitioner's professional expertise
	<p>.A19-A22 If the practitioner is selecting selects a sample, stating the size of the sample and how the selection sample was made (after agreement by the specified parties regarding the relevant parameters) selected contributes to the specificity of the description of procedures performed (for example, 50 items starting at the eighth</p>

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	item and selecting every fifteenth item thereafter or invoices issued from May 1 to July 31, 20XX).
	A20A23 Examples of other information the practitioner may include are the date the procedure was performed and the sources of information used in performing the procedure.
.18 In some circumstances, the procedures agreed upon evolve or are modified over the course of the engagement. In such circumstances, the practitioner should amend the engagement letter or other suitable form of written agreement, as applicable, to reflect the modified procedures.	
.19-17 The practitioner should not agree to perform procedures that are open to varying interpretations or that use vague or ambiguous language. Terms of uncertain meaning (such as <i>general review</i>, <i>limited review</i>, <i>check</i>, or <i>test</i>) should not be used in describing the procedures unless such terms are defined within the agreed-upon procedures. (Ref: par. A21,A24)	<p>A21A24 To avoid vague or ambiguous language, the procedures to be performed are characterized by the action to be taken at a level of specificity sufficient for a reader to understand the nature and extent of the procedures performed. Examples of acceptable descriptions of actions are <u>the following as follows:</u></p> <ul style="list-style-type: none"> a.●—Inspect b.●—Confirm c.●—Compare d.●—Agree e.●—Trace f.●—Inquire g.●—Recalculate h.●—Observe i.●—Mathematically check
	<p>Conversely, the following descriptions of actions (unless defined to indicate the nature, timing, and extent of the procedures associated with these actions) generally are not acceptable because they are not sufficiently precise or have an uncertain meaning:</p> <ul style="list-style-type: none"> a.●—Note b.●—Review

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	<p>e. General review d. Limited review e. Evaluate f. Analyze g. Check h. Test i. Interpret j. Verify k. Examine</p>
.2018 The practitioner should obtain evidence from applying the agreed-upon procedures to provide a reasonable basis for the finding or findings expressed in the practitioner's report but need not perform additional procedures outside the scope of the engagement to gather additional evidence.	
.19 While procedures may be developed or evolve over the course of the engagement, the practitioner should not perform procedures that are amended for the purpose of eliminating exceptions in testing.	
Using the Work of a Practitioner's External Specialist	Using the Work of a Practitioner's External Specialist (Ref: par. .21).20)
.2120 The practitioner and the specified parties engaging party should explicitly agree to the involvement of a practitioner's external specialist if assisting a practitioner in the performance of an agreed-upon procedures engagement. (Ref: par. .A22-.A24A25-.A27)	.22-A25 The practitioner's education and experience enable the practitioner to be knowledgeable about business matters in general, but the practitioner is not expected to have the expertise of a person trained for or qualified to engage in the practice of another profession or occupation. In certain circumstances, it may be appropriate to involve a practitioner's external specialist to assist the practitioner in the performance of one or more procedures. The following are examples of such circumstances:

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	<ul style="list-style-type: none"> a. An attorney providing assistance concerning who helps with the interpretation of legal terminology in laws, regulations, rules, contracts, or grants b. A medical specialist providing assistance in who assists with understanding the characteristics of diagnosis codes documented in patient medical records c. An environmental engineer providing assistance in interpreting who assists with the interpretation of environmental remedial action regulatory directives that may affect the agreed upon procedures applied to an environmental liabilities account in a financial statement d. A geologist providing assistance in distinguishing who helps distinguish between the physical characteristics of a generic minerals group related to information to which the agreed upon procedures are applied
	<p>.A23<ins>A26</ins> The agreement regarding the involvement of a practitioner's external specialist may be reached when agreeing upon the terms of the engagement or as part of obtaining agreement on the engaging party's acknowledgment that the procedures performed, or to be performed, and acknowledgment of responsibility are appropriate for the sufficiency of the procedures, as discussed in paragraph 10b-intended purpose of the engagement.</p>
	<p>.A24<ins>A27</ins> A practitioner may agree to apply procedures to the report or work product of a practitioner's external specialist that does not constitute assistance by the external specialist to the practitioner in an agreed-upon procedures engagement. For example, the practitioner may make reference to information contained in a report of a practitioner's external specialist in describing an agreed upon procedure. However, it is inappropriate for the practitioner to agree to merely read the external specialist's report solely to describe or repeat the findings or to take responsibility for all or a portion of any</p>

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	procedures performed by a practitioner's external specialist or the external specialist's work product.
.22-21 The practitioner's report should describe the nature of the assistance provided by the practitioner's external specialist.	
Using the Work of Internal Auditors or Other Practitioners	Using the Work of Internal Auditors or Other Practitioners (Ref: par. .23-.22 and par. .28)
.23-22 The agreed upon procedures to be enumerated or referred to in the practitioner's report should be performed entirely by the engagement team or other practitioners. (Ref: par. .A25-.A27A28-.A30)	.A25A28 Internal auditors or other personnel may prepare schedules and accumulate data or provide other information for the practitioner's use in performing the agreed upon procedures. Also, internal auditors may perform and report separately on procedures that they have carried out. Such procedures may be similar to those that a practitioner may perform under this section. .A26A29 A practitioner may agree to perform procedures on information documented in the working papers of internal auditors. For example, the practitioner may agree to do the following: e. — Repeat all or some of the procedures. f. — Determine whether the internal auditors' documentation indicates procedures performed and whether the findings documented are presented in a report by the internal auditors.
	.A27A30 It is inappropriate for the practitioner to do the following: 2. — agree to Merely read the internal auditors' report solely to describe or repeat their findings. 4. — Take responsibility for all or a portion of any procedures performed by internal auditors by reporting those findings as the practitioner's own. 2. — Report in any manner that implies shared responsibility for the procedures with the internal auditors.
Appropriateness of the Procedures Performed	Appropriateness of the Procedures Performed (Ref: par. .23 and .28)

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<p><u>.23</u> Prior to the issuance of the practitioner's agreed-upon procedures report, the practitioner should obtain a written acknowledgment from the engaging party that the procedures performed are appropriate for the intended purpose of the engagement. (Ref: par..A31–.A32)</p> <p><u>.24</u> If the engaging party refuses to provide the written acknowledgment required by paragraph .20, the practitioner should withdraw from the engagement.</p>	<p><u>.A31</u> The practitioner's communication with the engaging party enables the engaging party, if not already aware, to be made aware of the specific procedures performed and affords the engaging party an opportunity to suggest alternative or additional procedures that the engaging party may feel are appropriate in order to meet the purpose of the engagement.</p> <p><u>.A32</u> The written acknowledgment of the appropriateness of the procedures performed may be documented in the engagement letter, an addendum to the engagement letter, a representation letter, or some other written communication.</p>
Findings	Findings (Ref: par. .2625-.27)
<p><u>.24–.25</u> A practitioner should present the results of applying agreed upon procedures to specific subject matter in the form of findings. (Ref: par.A33)</p> <p><u>.25</u> The practitioner's report should not express an opinion or conclusion about whether the subject matter is in accordance with (or based on) the criteria or whether the assertion is fairly stated, for example, the report should not state, "Nothing came to our attention that caused us to believe that the subject matter is not in accordance with (or based on) the criteria, in all material respects, or that the assertion is not fairly stated, in all material respects."</p> <p><u>.26.26</u> The practitioner should report all findings from application of the agreed upon procedures. Any agreed upon specified materiality limits should be described in the practitioner's report. (Ref: par. .A28A34 and .A44)</p>	<p><u>.A33</u> Findings are the factual results of procedures performed. Findings are capable of being objectively verified and objectively described, which means that different practitioners performing the same procedures are expected to arrive at the same results. Accordingly, findings exclude opinions or conclusions in any form as well as any recommendations that the practitioner may make.</p> <p><u>.A28</u> The concept of materiality does not apply to findings to be reported in an agreed upon procedures engagement unless the definition of materiality is agreed to by the specified parties.<u>.A34</u> An example of language that describes a materiality limit is as follows: "For purposes of performing these agreed upon procedures, no exceptions were reported for differences of \$1,000 or less resulting solely from the rounding of amounts disclosed."</p>

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<p>.27 In reporting findings, the practitioner should (Ref: par. .A38-.A39)</p> <ul style="list-style-type: none"> a. not use vague or ambiguous language. (Ref: par. .A35) b. not include terms of uncertain meaning. (Ref: par. .A36) c. not express an opinion or conclusion about whether the subject matter is in accordance with (or based on) the criteria. (Ref: par. .A37) 	<p>A35 To avoid vague or ambiguous language, the findings are described at a level of specificity sufficient for a user to understand the nature, timing, and extent of the procedures and findings.</p> <p>A29A36 If, in the practitioner's judgment, certain terms are potentially uncertain in meaning, the practitioner may consider whether a glossary is appropriate in the circumstances.</p> <p>A37 An example of language that should not be used in reporting findings is as follows: "Nothing came to our attention that caused us to believe that the subject matter is not in accordance with (or based on) the criteria, in all material respects."</p> <p>A38 The following table provides examples of appropriate and inappropriate descriptions of findings resulting from the application of certain agreed-upon procedures.</p>											
<p>.27 The practitioner should avoid vague or ambiguous language in reporting findings. (Ref: par. A29)</p>	<table border="1"> <thead> <tr> <th>Appropriate Procedures Agreed Upon Appropriate</th> <th>Description of Findings</th> <th>Inappropriate Description of Findings</th> </tr> </thead> <tbody> <tr> <td>Inspect the shipment dates for a sample (agreed-upon) of specified shipping documents and determine whether any such dates were subsequent to [date].</td> <td>No shipment dates shown on the sample of shipping documents were subsequent to [date].</td> <td>Nothing came to my attention as a result of applying that procedure.</td> </tr> <tr> <td>Recalculate the number of blocks of streets paved during the year ended [date], shown on</td> <td>The number of blocks of streets paved in the chart of performance statistics was Y</td> <td>The number of blocks of streets paved approximated the number of blocks included in the chart</td> </tr> </tbody> </table>	Appropriate Procedures Agreed Upon Appropriate	Description of Findings	Inappropriate Description of Findings	Inspect the shipment dates for a sample (agreed-upon) of specified shipping documents and determine whether any such dates were subsequent to [date].	No shipment dates shown on the sample of shipping documents were subsequent to [date].	Nothing came to my attention as a result of applying that procedure.	Recalculate the number of blocks of streets paved during the year ended [date], shown on	The number of blocks of streets paved in the chart of performance statistics was Y	The number of blocks of streets paved approximated the number of blocks included in the chart		
Appropriate Procedures Agreed Upon Appropriate	Description of Findings	Inappropriate Description of Findings										
Inspect the shipment dates for a sample (agreed-upon) of specified shipping documents and determine whether any such dates were subsequent to [date].	No shipment dates shown on the sample of shipping documents were subsequent to [date].	Nothing came to my attention as a result of applying that procedure.										
Recalculate the number of blocks of streets paved during the year ended [date], shown on	The number of blocks of streets paved in the chart of performance statistics was Y	The number of blocks of streets paved approximated the number of blocks included in the chart										

Proposed AT-C 215 ED marked from extant – May 2019
ARSC Meeting, May 7-8, 2019

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	contractors' certificates of project completion; compare the resultant number to the number in an identified chart of performance statistics as of [date].	blocks more than the number calculated from the contractors' certificates of project completion.	of performance statistics.
	Recalculate the rate of return on a specified investment (according to an agreed-upon formula) and determine whether the resultant percentage agrees to the percentage in an identified schedule.	No exceptions were found as a result of applying the procedure.	The resultant percentage approximated the predetermined percentage in the identified schedule.
	Inspect the quality standards classification codes in identified performance test documents for products produced during [specified period]; compare such codes to those shown in the [identified]	All classification codes inspected in the identified documents were the same as those shown in the computer printout, except for the following: <i>[List all exceptions.]</i>	All classification codes appeared to comply with such performance documents.

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	computer printout for [<i>specified period</i>] as of [<i>date</i>].		
	Trace all outstanding checks appearing on a bank reconciliation as of [<i>date</i>] to checks cleared in the bank statement of the subsequent month.	All outstanding checks appearing on the bank reconciliation were traced to the list of cleared checks in the subsequent month's bank statement, except for the following: [List all exceptions.]	Nothing came to my attention as a result of applying the procedure.
	Compare the amounts of the invoices included in the "over 90 days" column shown in an identified schedule of aged accounts receivable of a specific customer as of [<i>date</i>] to the amount and invoice date shown on the corresponding outstanding invoice. Determine whether the dates on the corresponding outstanding invoices precede the date	All outstanding invoice amounts agreed with the amounts shown on the schedule in the "over 90 days" column, and the dates shown on such outstanding invoices preceded the date indicated on the schedule by more than 90 days.	The outstanding invoice amounts agreed within approximation of the amounts shown on the schedule in the "over 90 days" column, and nothing came to our attention that the dates shown on such outstanding invoices preceded the date indicated on the schedule by more than 90 days.

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	indicated on the schedule by more than 90 days.
	<p>Obtain from XYZ Company [personnel specified by management], the [date] bank reconciliations. Confirm with the bank the cash on deposit as of [date]. Compare the balance confirmed by the bank to the amount shown on the bank reconciliations.</p> <p>[List all exceptions.]</p>
	<p><u>A39</u> When a procedure is written in sufficient detail, the finding may be very brief because the practitioner does not need to repeat the procedure in describing the result. When there are no exceptions, common descriptions of results are the following:</p> <ul style="list-style-type: none"> • No exceptions were noted. • No exceptions were [noted-found/identified] as a result of applying the procedure. <p>It is acceptable to repeat part of the procedure in the finding, such as in the following examples:</p> <ul style="list-style-type: none"> • No shipment dates shown on the sample of shipping documents were subsequent to [date].

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	<ul style="list-style-type: none"> • All outstanding invoice numbers, dates, and amounts agreed with the corresponding fields on the “over 90 days” column of the schedule. <p>If the practitioner identifies exceptions in applying the procedures, the report states them and provides some detail about the item or items involved, such as in the following examples:</p> <ul style="list-style-type: none"> • We found 14 out of the 15 items to be in agreement; the address on one item on the schedule did not agree to the [source document]. • The amount recalculated as a result of performing the procedure was \$xxx, which did not agree with the amount of \$yyy on the [describe supporting document]. • Of the 30 selections made, two [insert attribute, such as amounts, dates, names] did not agree from the [describe the supporting documentation] to the [describe the supporting documentation]. <p>A finding written to appear to be a representation of fact or a conclusion would not be appropriate, such as in the following examples:</p> <ul style="list-style-type: none"> • A result stating, “We determined the current ratio of X Company at December 31, 20X4, was 2:1,” could be considered a representation of fact and is not appropriate. An appropriate description of the result could be stated as, “We recalculated the current ratio of X Company at December 31, 20X4, as 2:1.” • A result stating, “We have [observed/found/determined] the net sales of X Company for the year 20X4 were \$X,” could be considered a representation of fact and is not appropriate. An appropriate description of the result could be stated as, “We

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	<p><u>recalculated the net sales of X Company for the year 20X4 based on totaling the list of invoices in the sales journal as \$X.”</u></p> <p><u>Additionally, terms that might be construed as communicating assurance—such as “reasonable” or “adequate,” or that the results of applying the procedure were “close enough”—would not be appropriate. For example, it is inappropriate to state the following:</u></p> <ul style="list-style-type: none"> • <u>The [number of blocks of streets paved] per the [supporting documentation] approximated the [number of blocks of streets paved] included in the chart of performance statistics for the year ended [date].</u> • <u>All [classification codes] appear to comply with the requirements in the contract.</u> <p><u>Terms such as “minor,” “immaterial,” “material,” or “significant,” unless the measures of relevance comprehended by such terms are clearly defined in both the engagement letter and the practitioner’s report, are not appropriate for use in expressing results of procedures. It is also inappropriate to word a finding to convey negative assurance. For example, it is inappropriate to state the following:</u></p> <ul style="list-style-type: none"> • <u>Nothing came to our attention as a result of applying the procedure.</u> • <u>Nothing came to our attention that caused us to believe that [the subject matter] is not presented in accordance with [the criteria].</u>
Written Representations	Written Representations (Ref: par. .28)
.28 The practitioner should request from the responsible <u>engaging</u> party written representations in the form of a letter addressed to the practitioner. The representations should <u>do</u> the following: (Ref: par. <u>.A30-.A32</u> and <u>.A40</u>)	<u>.A30</u> <u>.A40</u> Written confirmation of oral representations reduces the possibility of misunderstandings between the practitioner and the responsible <u>engaging</u> party. The person(s) from whom the practitioner

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Introduction, Objectives, Definitions, and Requirements <ul style="list-style-type: none"> a. include <u>State that the responsible party's assertion about party is responsible for the subject matter based on the criteria.</u> b. State that <u>it has provided the practitioner with all relevant information and access, as applicable, as agreed upon in the terms of the engagement.</u> c. State that all known matters contradicting the subject matter <u>or assertion</u> and any communication from regulatory agencies or others affecting the subject matter <u>or assertion</u> have been disclosed to the practitioner, including communications received between the end of the period addressed <u>in by the written assertion subject matter</u> and the date of the practitioner's report. e. acknowledge responsibility for <ul style="list-style-type: none"> i. the subject matter and the assertion; ii. selecting the criteria, when applicable; and iii. determining that such criteria are appropriate for the responsible party's purposes. d. State that it is not aware of any material misstatements in the subject matter. e. State that it 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. f. state that it has provided <u>Include any additional representations that the practitioner with access to all records relevant to the subject matter and the agreed upon procedures determines are appropriate.</u> 	Application and Other Explanatory Material <p>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 engaging party(ies), which may vary by entity, reflecting influences such as size and ownership characteristics.</p>

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<p>e. state that the responsible party has disclosed to the practitioner other matters as the practitioner deems appropriate.</p> <p>.29 When the engaging party is not the responsible party, the practitioner should <u>request written representations from the engaging party, in addition to those requested from the responsible party, in the form of a letter addressed to the practitioner.</u> The representations should</p> <p>a. acknowledge that the responsible party is responsible for the subject matter and 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><u>consider requesting written representations pursuant to paragraph .28 from the responsible party in the form of a letter addressed to the practitioner.</u></p> <p>.30 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 findings.</p>	

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Requested Written Representations Not Provided or Not Reliable <p>.31 When the engaging party is the responsible party, and one or more of the requested written representations <u>pursuant to paragraphs .28-.29</u> 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 <u>do the following:</u> (Ref: par. A41)</p> <ol style="list-style-type: none"> Discuss the matter with the appropriate party(ies); Reevaluate the integrity of those from whom the representations were requested or received and evaluate the effect, <u>if any, that this may have on the engagement; reliability of representations and evidence in general.</u> If any of the matters are not resolved to the practitioner's satisfaction, take appropriate action. (Ref: par. A34, including determining the possible effect on the practitioner's agreed-upon procedures report. (Ref: par. A42) 	Requested Written Representations Not Provided or Not Reliable (Ref: par. .31c, .32, and .43b(iv)) <p>A41 Circumstances in which the practitioner may be unable to obtain requested written representations include, for example, when</p> <ul style="list-style-type: none"> <u>the engaging party does not have a relationship with the responsible party and</u> <u>the agreed-upon procedures engagement is undertaken against the wishes of the responsible party, for example when required by law or regulation.</u> <p>In these or similar circumstances, the practitioner may need to reconsider whether the responsible party is able to take responsibility for the subject matter.</p> <p>A42 Although it is expected that the practitioner will be able to obtain all the requested written representations from the engaging party <u>or the responsible party, as appropriate, pursuant to paragraphs .28-.29,</u> appropriate actions the practitioner might consider in the circumstances described in paragraph .31c include the following:</p> <p>paragraph c include</p> <ul style="list-style-type: none"> a. withdrawing from the engagement. <ol style="list-style-type: none"> Determining the effect on the practitioner's report, including whether to restrict the use of the practitioner's report or whether to disclose in the practitioner's report that the engaging party or the responsible party did not provide one or more of the requested written representations <p>b. Withdrawing from the engagement</p>

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<p><u>.32</u> When the engaging party is not the responsible party</p> <p>a. if one or more of the requested representations in paragraph .28 are not provided in writing by the responsible party, the practitioner should make inquiries of the responsible party about, and seek oral responses to, the matters in paragraph .28. (Ref: par. A32)</p> <p>b. if one or more of the requested representations are not provided in writing or orally from the responsible party, the practitioner should take appropriate action. (Ref: par. A33)</p>	<p><u>A32</u> Documentation requirements regarding the responsible party's oral responses to the practitioner's inquiries about the matters in paragraph .28 are included in paragraph .43(b)(iv). Appropriate action the practitioner might consider in the circumstances described in paragraph .32b include</p> <ul style="list-style-type: none"> • withdrawing from the engagement. • determining the effect on the practitioner's report.
Preparing the Practitioner's Report	Preparing the Practitioner's Report (Ref: par. <u>.33</u>, <u>.32</u>, and <u>.34</u>)
<p><u>.33</u> <u>.32</u> The practitioner's report should be in writing. (Ref: par. <u>A34A43</u>)</p>	<p><u>A34A43</u> This section does not require a standardized format for reporting on all agreed-upon procedures engagements. Instead, it identifies the basic elements that the 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 boldface text), and other mechanisms to enhance the clarity and readability of the report.</p>
<p><u>.34</u> <u>.33</u> The practitioner's report should be in the form of procedures and findings.</p> <p><u>.34</u> If, as a result of performing procedures, the practitioner determines that the description of the procedures performed or the corresponding findings, in the practitioner's professional judgment, are misleading in the circumstances of the engagement, the practitioner should discuss the matter with the engaging party and take appropriate action. (Ref: par. A44–A45)</p>	<p><u>A44</u> Findings may be misleading, for example, if the responsible party revises the subject matter as a result of initial findings from procedures performed, and the findings to be expressed in the report do not indicate that the subject matter was changed. In such instances, the findings may indicate that the subject matter was revised as a result of initial findings from the procedures performed and that there are no findings with respect to the revised subject matter.</p> <p><u>A45</u> Appropriate actions that the practitioner might consider in the circumstances described in paragraph .34 include</p>

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	<p><i>a.</i> performing revised procedures, <i>b.</i> rewording a procedure or a finding, or <i>c.</i> withdrawing from the engagement.</p>
Content of the Practitioner’s Agreed-Upon Procedures Report	Content of the Practitioner’s Agreed-Upon Procedures Report
<p>.35 The practitioner’s agreed-upon procedures report should include the following:</p> <ul style="list-style-type: none"> <i>a.</i> A title that includes the word <u>independent</u> <u>to clearly indicate that it is the report of an independent accountant</u>. (Ref: par. .A35A46) <i>b.</i> An appropriate addressee as required by the circumstances of the engagement. <i>c.</i> —An Identification of the subject matter <u>to which the procedures have been applied</u>, (Ref: par. .A47) <i>d.</i> <u>Identification of</u> or assertion <u>the engaging party, and</u> <i>e.</i> <u>Identification of the responsible party including a statement that the responsible party is responsible for the subject matter</u>. <i>f.</i> <u>Identification of</u> the intended purpose of the engagement in sufficient detail to enable the reader to understand the nature of <u>an</u> <u>the work</u> performed. (Ref: par. .A48) 	<p>Title (Ref: par. .35a)</p> <p>.A35A46 A title indicating that the practitioner’s report is the report of an independent practitioner (for example, “Independent Practitioner’s Report,” “Report of Independent Certified Public Accountant,” or “Independent Accountant’s Report”) affirms that the practitioner has met all of the relevant ethical requirements regarding independence and, therefore, distinguishes the independent practitioner’s report from reports issued by others.</p> <p><i>Identification of the Subject Matter to Which the Procedures Have Been Applied (Ref: par. .35c)</i></p> <p>.A36—A47 A practitioner may be asked to apply <u>agreed upon</u> procedures to more than one subject matter. In these engagements, the practitioner may issue one practitioner’s report that refers to all subject matter covered. <u>AT-C</u> section 315 contains an example of language that may be used in the introductory paragraph to address such circumstances.⁴</p> <p><i>Description of the Intended Purpose of the Agreed-Upon Procedures Engagement (Ref: par. .35f)</i></p>

⁴ Paragraph .A32 of AT-C section 315, *Compliance Attestation*.

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<p><u>g.</u> A statement that the procedures performed were those agreed to by the engaging party and that engaging party has acknowledged the appropriateness of the procedures to meet the intended purpose of the engagement and one of the following:</p> <ol style="list-style-type: none"> 1) A statement that no other party acknowledged the appropriateness of the procedures; 2) An identification of any other parties who agreed to and acknowledged the appropriateness of the procedures for their purposes and a statement that these parties have acknowledged that the procedures performed are appropriate for their purposes; or 3) A statement that the procedures are specified in a contract, law, or regulation and a reference to the contract, law, or regulation that clearly indicates that additional parties are parties to the contract, law, or regulation. <p><u>h.</u> A statement that the <u>agreed upon procedures engagement</u>, <u>practitioner's report may not be suitable for any other purpose</u>. (Ref: par. A36.A49)</p> <p><u>i.</u> If applicable, a statement that the practitioner makes no representation regarding the appropriateness of the procedures either for the purpose for which the report has been requested or for any other purpose.</p> <p><u>j.</u> A statement that the procedures performed may not address all of the items of interest to a user and may not meet the needs of all users and, as such, users are responsible for determining whether the procedures performed are appropriate for their intended purpose.</p> <p><u>d.</u> An identification of the specified parties. <u>A statement</u></p>	<p>A48 Because the practitioner is precluded from expressing an opinion or conclusion, it would not be appropriate to state that the intended purpose of the engagement was to determine whether the subject matter was prepared or is stated in accordance with specified criteria or that the practitioner performed the engagement to conclude whether the entity complied with specified criteria.</p> <p>Formatted: Indent: Left: 0.74", Numbered + Level: 1 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 0.69" + Indent at: 0.94", Tab stops: Not at 0.5"</p> <p>Limitations on Items of Interest and Needs of Users (Ref: par. .35h)</p> <p>A49 The practitioner may advise potential users regarding inappropriate uses of the practitioner's agreed-upon procedures report. For example, the practitioner may advise that the report is not intended for making investment decisions or for use by potential lenders or investors.</p>

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<p><i>k.</i> A statement that an agreed-upon procedures engagement involves the practitioner performing <u>specific</u> procedures that the engaging party has acknowledged to be appropriate for the purpose of the engagement and reporting on findings based on the procedures performed.</p> <p><i>l.</i> that the procedures performed were those agreed to by the specified parties identified in the report.</p> <p><i>f.</i> A statement that identifies the responsible party and its responsibility for the subject matter or its assertion.</p> <p><i>g.</i> A statement that</p> <ul style="list-style-type: none"><i>i.</i> the sufficiency of the procedures is solely the responsibility of the parties specified in the report.<i>ii.</i> the practitioner makes no representation regarding the sufficiency of the procedures either for the purpose for which the report has been requested or for any other purpose. <p><i>h.</i></p> <p><i>l.</i> A <u>list</u> <u>description</u> of the procedures performed <u>(or reference thereto)</u> and related findings. (The practitioner should not provide a conclusion. (See paragraph .25.) detailing the nature and extent, and if applicable, the timing, of each procedure.</p> <p><i>m.</i> A description of the findings from each procedure performed, including sufficient details on exceptions found.</p> <p><i>n.</i> When—if applicable, a description of any agreed upon specified materiality limits.</p> <p><i>o.</i> A statement that</p>	

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Proposed AT-C Section 215, Agreed-Upon Procedures Engagements

Introduction, Objectives, Definitions, and Requirements	Application and Other Explanatory Material
<p>i. the agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants.</p> <p>ii.p. <u>A statement that</u> the practitioner was not engaged to and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on the subject matter. (Ref: par. .A50)</p> <p>ii.q. <u>A statement that</u> the practitioner does not express such an opinion or conclusion.</p> <p>ii.r. <u>A statement that</u> had the practitioner performed additional procedures, other matters might have come to the practitioner's attention that would have been reported. (Ref: par. .A37)</p> <p>s. A statement that the practitioner is <u>required to be independent of the entity and to meet</u> the practitioner's other ethical responsibilities in accordance with <u>the</u> relevant ethical requirements relating to the agreed-upon procedures engagement. (Ref: par. .A51–.A52)</p> <p>t. <u>When If</u> applicable, <u>A-a</u> description of the nature of the assistance provided by a practitioner's external specialist, as discussed in paragraphs <u>.20–.21</u>.</p>	<p>Statement When the Subject Matter Consists of Elements, Accounts, or Items of a Financial Statement (Ref: par. .35j35p)</p> <p>A37A50 If the subject matter consists of elements, accounts, or items of a financial statement, the practitioner's report might, instead, state that the <u>agreed upon</u> procedures do not constitute an audit (or a review) of financial statements or any part thereof, the objective of which is the expression of an opinion (or conclusion) on the financial statements or a part thereof.</p> <p>Reservations or Restrictions Concerning Procedures or Findings (Ref: par. .35l)</p> <p>A38 The practitioner also <u>Relevant Ethical Requirements (Ref: par. .35s)</u></p> <p>A51 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>A52 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 <u>Government Auditing Standards</u> promulgated by the Comptroller General of the United States) or refer to a term that appropriately describes those sources.</p>

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<p><i>L<u>u</u> When If</i> applicable, reservations or restrictions concerning limitations on procedures or findings. (Ref: par. A38.<u>A53</u>)</p> <p>m. An alert, in a separate paragraph, that restricts the use of the report. The alert should</p> <ol style="list-style-type: none"> state that the practitioner's report is intended solely for the information and use of the specified parties; identify the specified parties for whom use is intended; and State that the report is not intended to be, and should not be, used by anyone other than the specified parties. (Ref: par. A39 .A40) <p>n. When the engagement is also performed in accordance with <i>Government Auditing Standards</i>, the alert that restricts the use of the report should include the following information, rather than the information required by paragraph 35m:</p> <ol style="list-style-type: none"> A description of the purpose of the report; and A statement that the report is not suitable for any other purpose. <p><i>P</i> <i>#w.</i> The city and state where the practitioner practices. (Ref: par. A41.<u>A54</u>)</p>	<p>Limitations on Procedures or Findings (Ref: par. .35u)</p> <p><u>A53</u> Examples of limitations on procedures or findings may include explanatory paragraph(s) about matters such as the following:</p> <ul style="list-style-type: none"> Disclosure of stipulated facts, assumptions, or interpretations (including the source thereof) used in the application of agreed upon procedures Description of the condition of records, controls, or data to which the procedures were applied Explanation that the practitioner has no responsibility to update the practitioner's report Explanation that the sample may not be representative of the population <p>Restricted Use (Ref: par. 35m)</p> <p><u>A39</u> The purpose of the restriction on the use of the practitioner's report on applying agreed upon procedures is to restrict its use to only those parties that have agreed upon the procedures performed and taken responsibility for the sufficiency of the procedures. Paragraph .38 describes the process for adding parties who were not originally contemplated in the agreed upon procedures engagement.</p> <p><u>A40</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 part of its oversight responsibility for an entity, may require access to a restricted use report in which they are not named as a specified party.</p> <p>Location (Ref: par. .35w)</p>

Proposed AT-C Section 215, Agreed-Upon Procedures Engagements

Introduction, Objectives, Definitions, and Requirements	Application and Other Explanatory Material
<p>q</p> <p>x. The date of the report. (The report should be dated no earlier than the date on which the practitioner completed the procedures and determined the findings, including that</p> <ul style="list-style-type: none"> i. the attestation documentation has been reviewed, <u>and</u> ii. if applicable, the written presentation of the subject matter has been prepared, <u>and</u> iii. the responsible party has provided a written assertion, unless the responsible party refuses to provide an assertion.) 	<p>.A41-.A54 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. <u>The city and state where the practitioner practices may be indicated on letterhead that contains the issuing office's location.</u></p>
<p>Responsible Party Refuses to Provide a Written Assertion</p> <p>.36 When the responsible party refuses to provide the practitioner with a written assertion, the practitioner should disclose in the practitioner's report the responsible party's refusal to provide a written assertion. (Ref: par. .A42-.A43)</p>	<p>Responsible Party Refuses to Provide a Written Assertion (Ref: par. .36)</p> <p>.A42 The disclosure in the practitioner's report required by paragraph .36 applies regardless of whether the engaging party is the responsible party.</p> <p>.A43 The following is an example of the disclosure required by paragraph .36:</p> <p>Attestation standards established by the American Institute of Certified Public Accountants require that we request a written statement from [identify the responsible party] stating that [identify the subject matter] to which we applied procedures has been accurately measured or evaluated. We requested that [identify the responsible party] provide such a statement but [identify the responsible party] refused to do so.</p>
<p>Alert That Restricts the Use of the Practitioner's Agreed-Upon Procedures Report</p>	<p>Alert That Restricts the Use of the Practitioner's Agreed-Upon Procedures Report (Ref: par. .36-.37)</p>

Proposed AT-C Section 215, Agreed-Upon Procedures Engagements

Introduction, Objectives, Definitions, and Requirements	Application and Other Explanatory Material
<p><u>.36</u> The practitioner, utilizing professional judgment, should consider whether to include an alert, in a separate paragraph, that restricts the use of the practitioner's agreed-upon procedures report. (Ref: par. .A55–.A57)</p>	<p><u>.A55</u> Based on the circumstances of the engagement, the practitioner may consider it appropriate to include an alert, in a separate paragraph, that restricts the use of the practitioner's agreed upon procedures report. Examples of situations in which the practitioner, utilizing professional judgment, may determine to include an alert, in a separate paragraph, that restricts the use of the practitioner's agreed-upon procedures report include, but are not limited to, the following:</p> <ul style="list-style-type: none">● When agreed-upon procedures are performed on compliance with aspects of contractual agreements, the practitioner may determine to restrict the use of the report to the parties to the contract or agreement.● When agreed-upon procedures are performed to comply with regulatory requirements, the practitioner may determine to restrict the use of the report to the engaging party and the regulator.● When agreed-upon procedures are performed relating to certain subject matter (for example, subject matter addressed in the AT-C section 300 series).● When the procedures that the practitioner is engaged to perform are prescribed and the practitioner does not have the ability to perform or design additional procedures, the practitioner may determine to restrict the use of the report to those parties that prescribed the procedures. <p><u>.A56</u> A practitioner's report that includes 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. The inclusion of the separate restricted-use report does not affect the intended use of the general-use report nor does the inclusion of the general-use report affect the intended use of the restricted-use report. The restricted-use report remains restricted as to use and the general-use report continues to be for general-use.</p>

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	<p><u>A57</u> A practitioner may also issue a single combined practitioner's report that includes (a) a practitioner's report that includes an alert that restricts its use and (b) a report that is for general use. If these two types of reports are clearly differentiated within the combined report, such as through the use of appropriate headings, the alert that restricts the use of the report may be limited to the report that includes an alert that restricts its use. In such circumstances, the use of the general use report is not affected.</p> <p><u>A58</u> Law or regulation may require that a practitioner's agreed-upon procedures report be made available to the public as a matter of public record and the engaging party may otherwise distribute the report to parties other than those specified in the alert that restricts the use of the practitioner's agreed-upon procedures report. A practitioner is not responsible for controlling, and cannot control, distribution of the practitioner's agreed-upon procedures report after its release. The alert that restricts the use of the practitioner's agreed-upon procedures report is designed to avoid misunderstandings related to the use of the practitioner's agreed-upon procedures report, particularly if the practitioner's agreed-upon procedures report is taken out of the context in which the practitioner's agreed-upon procedures report is intended to be used. A practitioner may consider informing the engaging party or other specified parties that the practitioner's agreed-upon procedures report is not intended for distribution to parties other than those specified in the practitioner's agreed-upon procedures report. The practitioner may, in connection with establishing the terms of the engagement, reach an understanding with the engaging party that the intended use of the practitioner's agreed-upon procedures report will be restricted and may obtain the engaging party's agreement that the engaging party and specified parties will not distribute such practitioner's agreed-upon procedures report to parties other than those identified therein.</p>

.34 The alert should do the following:

- a. State that the practitioner's report is intended solely for the information and use of the specified parties.
- b. Identify the specified parties for whom use is intended. (Ref: par. .A59–.A60)
- c. State that the report is not intended to be, and should not be, used by anyone other than the specified parties. (Ref: par. .A61–.A62)

A59 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.

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A60 Subsequent to the completion of the engagement, the practitioner may be requested by the engaging party to consider the addition of another party as a specified party. The practitioner may agree to add another party as a specified party, based on consideration of such factors as the identity of that party and the intended use of the practitioner's report. If the additional party is added after the practitioner has issued the report, the report may be reissued, or the practitioner may provide other written acknowledgment that the additional party has been added as a specified party.

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A61 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 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 engaging party (and possibly with the specified parties) that the intended use of the report will be restricted and may obtain the engaging party's agreement that the engaging party and specified parties will not distribute such report to parties other than those identified therein. A practitioner cannot control, and is not responsible for controlling, distribution of the report after its release.

A62 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

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	agency, as part of its oversight responsibility for an entity, may require access to a restricted-use report in which it is not named as a specified party.
Restrictions on the Performance of Procedures	
.37-.38 When circumstances impose restrictions on the performance of the agreed upon procedures, the practitioner should attempt to obtain agreement from discuss with the specified parties for modification of engaging party whether those restrictions are appropriate and, if the agreed upon procedures. When such agreement cannot be obtained (for example, when the agreed upon procedures are published by a regulatory agency that will not modify the procedures), the practitioner should restrictions are appropriate, describe anythe restrictions on the performance of procedures in the practitioner's report or withdraw from the engagement.	
Adding Specified Parties (Nonparticipant Parties)	Adding Specified Parties (Nonparticipant Parties) (Ref: par. →)
.38 If the practitioner agrees to add a nonparticipant party, the practitioner should obtain affirmative acknowledgment, normally in writing, from the nonparticipant party agreeing to the procedures performed and of its taking responsibility for the sufficiency of the procedures. (Ref: par. .A44)	.A44 Subsequent to the completion of the agreed upon procedures engagement, a practitioner may be requested by the engaging party to consider the addition of another party as a specified party (a nonparticipant party). The practitioner may agree to add a nonparticipant party as a specified party, based on consideration of such factors as the identity of the nonparticipant party and the intended use of the practitioner's report. If the nonparticipant party is added after the practitioner has issued the report, the report may be reissued, or the practitioner may provide other written acknowledgment that the nonparticipant party has been added as a specified party.
.39 If the practitioner's report is reissued to acknowledge the nonparticipant party, the date of the report should not be changed. (Ref: par. .A44)	
.40 If the practitioner provides written acknowledgment that the nonparticipant party has been added as a specified party, such written acknowledgment ordinarily should state that no procedures have been performed subsequent to	

<i>Proposed AT-C Section 215, Agreed-Upon Procedures Engagements</i>	
Introduction, Objectives, Definitions, and Requirements the date of the practitioner's report.	Application and Other Explanatory Material
Knowledge of Matters Outside Agreed-Upon Procedures	Knowledge of Matters Outside Agreed-Upon Procedures (Ref: par. .4139) .41–39 Although the practitioner need not perform procedures beyond the agreed upon-procedures acknowledged by the engaging party to be appropriate for the intended purpose of the engagement, if in connection with the application, and through the completion of, the agreed upon procedures engagement, matters come to the practitioner's attention by other means that significantly contradict the subject matter or assertion referred to in the practitioner's report, the practitioner should discuss the matter with the engaging party and take appropriate action, including determining whether include this matter in the practitioner's report should be revised to disclose the matter. (Ref: par. .A45A63–.A46A64) .A45–A63 For example, if, during the course of applying agreed-upon-procedures regarding an entity's internal control, the practitioner becomes aware of a material weakness by means other than performance of the agreed upon-procedures, this matter would may be included in the practitioner's report.
Communication Responsibilities	.A46A64 When the practitioner applies agreed-upon procedures to an element, account, or item of a financial statement and has performed (or has been engaged to perform) an audit or review of the entity's related financial statements, and the auditor's practitioner's audit or review report on such financial statements includes a departure from the standard report, the practitioner may include a reference to the auditor's audit or review report and the departure from the standard report in the practitioner's agreed-upon procedures report.
Documentation	Documentation (Ref: par. .4341) .4341 The practitioner should prepare engagement documentation on a timely basis that is sufficient to determine includes the following: (Ref: par. .A47.A65–.A66) .A47.A65 Documentation prepared at the time work is performed or shortly thereafter is likely to be more accurate than documentation prepared at a much later time.

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<ul style="list-style-type: none"> a. the specified parties' agreement on the procedures; a. The written acknowledgment from the engaging party regarding the appropriateness of the procedures performed for the intended purpose of the engagement, as required by paragraph .23 b. 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: <ul style="list-style-type: none"> i. The identifying characteristics of the specific items or matters tested; ii. Who performed the engagement work and the date such work was completed; iii. When the engaging party is the responsible party and the responsible party will not provide one or more of the requested written representations or the practitioner concludes that there is sufficient doubt about the competence, integrity, ethical values, or diligence of those providing the written representations, or that the written representations are otherwise not reliable, the matters in paragraph .31a-c; iv. when the engaging party is not the responsible party and the responsible party will not provide the written representations regarding the matters in paragraph .28, the oral responses from the responsible party to the practitioner's inquiries regarding the matters in paragraph .28, in accordance with paragraph .32; and <i>iv.</i> (Ref. par. A32) iv. Who reviewed the engagement work performed and the date and extent of such review; •d. e. The results of the procedures performed and the evidence obtained 	<p>A66 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>

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ARSC Meeting, May 7-8, 2019

<u>Proposed AT-C Section 215, Agreed-Upon Procedures Engagements</u>				
Introduction, Objectives, Definitions, and Requirements	Application and Other Explanatory Material			
	<p>Exhibit Illustrative Practitioner's Agreed-Upon Procedures Reports</p> <p>The illustrative practitioner's agreed upon procedures reports in this exhibit meet the applicable reporting requirements in paragraphs 33-41. A practitioner may use alternative language in drafting an agreed upon procedures report, provided that the language meets the applicable requirements in paragraphs 33-41. Example 1 is an illustrative agreed upon procedures report related to a Statement of Investment Performance Statistics. Examples 2-3 provide illustrations of reports in which the practitioner has applied agreed-upon procedures to elements, accounts, or items of a financial statement.</p>			
	<p>Example 1: Practitioner's Agreed Upon Procedures Report Related to a Statement of Investment Performance Statistics</p> <p>Independent Accountant's Report on Applying Agreed Upon Procedures</p> <p>{Appropriate Addressee}</p> <p>We have performed the procedures enumerated below, which were agreed to by [identify the specified party(ies), for example the audit committees and management of ABC Inc. and XYZ Fund], on [identify the subject matter, for example, the accompanying Statement of Investment Performance Statistics of XYZ Fund for the year ended December 31, 20X1]. XYZ Fund's management is responsible for [identify the subject matter, for example, the accompanying Statement of Investment Performance Statistics of XYZ Fund for the year ended December 31, 20X1]. The sufficiency of these procedures is solely the responsibility of the parties specified in this report. Consequently, we make no representation regarding the sufficiency of the</p>			

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	<p>procedures enumerated below either for the purpose for which this report has been requested or for any other purpose, solely for the purpose of [identify the intended purpose of the engagement].</p> <p>[Include paragraphs to enumerate procedures and findings.]</p> <p>This agreed upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on [identify the subject matter, for example, the accompanying Statement of Investment Performance Statistics of XYZ Fund for the year ended December 31, 20X1]. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.</p> <p>[Additional paragraph(s) may be added to describe other matters.]</p> <p>This report is intended solely for the information and use of [identify the specified party(ies) for example, the audit committees and managements of ABC Inc. and XYZ Fund], and is not intended to be, and should not be, used by anyone other than the specified parties.</p> <p>[Practitioner's signature] [Practitioner's city and state] [Date of practitioner's report]</p>

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Exhibit A —Illustrative Engagement Letters for an Agreed-Upon Procedures Engagement

The illustrative engagement letters in this exhibit meet the applicable requirements in paragraphs .13–14. A practitioner may use alternative language in drafting an engagement letter for an agreed-upon procedures engagement, provided that the language meets the applicable requirements in paragraphs .13–14.

Example 1: An Engagement Letter for an Engagement to Apply Agreed-Upon Procedures to a Statement of Investment Performance Statistics

Circumstances include the following:

- The subject matter of the engagement is a statement of investment performance statistics;
- The engaging party is the responsible party;
- The practitioner will assist in the development of the procedures as part of the agreed-upon procedures engagement; and
- It is anticipated that the engaging party will be the only party that will acknowledge that the procedures performed are appropriate for the intended purpose of the engagement and that no other party will be requested to acknowledge that the procedures performed are appropriate for their purposes.

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To the appropriate representative of management of XYZ Fund:¹

You² have requested that we perform an agreed-upon procedures engagement on the Statement of Investment Performance Statistics of XYZ Fund for the year ended December 31, 20X1.³ We are pleased to confirm our acceptance and understanding of this engagement by means of this letter.

Our Understanding of the Nature of the Engagement

The following represents our understanding of the nature of this engagement:

- a. The intended purpose of the engagement is [identify the intended purpose of the engagement; for example, to assist users of the practitioner's report to monitor the financial performance of XYZ Fund];
- b. The agreed-upon procedures engagement is not required by any law, regulation, or contract;
- c. The procedures that we will perform are not prescribed. We will assist in the development of the procedures to be performed; and
- d. You will acknowledge that the procedures performed are appropriate for the intended purpose of the

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¹The addressee and references on the engagement letter would be those that are appropriate in the circumstances of the agreed-upon procedures engagement, including the relevant jurisdiction. It is important to refer to the appropriate persons.

²Throughout this engagement letter, references to *you, we, us, management, and practitioner* would be used or amended as appropriate in the circumstances.

³The practitioner may include reference to other services to be performed.

engagement and no other party will be requested to acknowledge that the procedures performed are appropriate for their purposes.

Our Responsibilities

The objective of our engagement is to

- a. Apply specific procedures to the Statement of Investment Performance Statistics of XYZ Fund for the year ended December 31, 20X1.
- b. Issue a written report that describes the procedures applied and our findings without providing an opinion or conclusion on the Statement of Investment Performance Statistics of XYZ Fund for the year ended December 31, 20X1.
- c. Communicate further as required by our professional standards and as appropriate.

We will conduct our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants and comply with the AICPA's Code of Professional Conduct, including ethical principles of integrity, objectivity, professional competence, and due care.

Because our engagement will not constitute an audit or review, the objective of which would be the expression of an opinion or conclusion, respectively on the Statement of Investment Performance Statistics of XYZ Fund for the year ended December 31, 20X1, we will not express such an opinion or conclusion. If we were engaged to perform additional procedures, other matters might come to our attention that we would report to you.

Our engagement cannot be relied upon to identify or disclose any misstatements in the Statement of Investment Performance Statistics of XYZ Fund for the year ended December 31, 20X1, including those caused by error or fraud, or to identify or disclose any wrongdoing within the Company or noncompliance with laws and regulations. However, we will inform the appropriate level of management of any material errors and any evidence or information that comes to our attention during the performance of the procedures that indicates fraud may have occurred. In addition, we will report to you any evidence or information that comes to our attention during the performance of the procedures regarding noncompliance with laws and regulations that may have occurred.

Your Responsibilities

You have the following overall responsibilities that are fundamental for our undertaking of the engagement:

- a. You are responsible for the Statement of Investment Performance Statistics of XYZ Fund for the year ended December 31, 20X1;
- b. To provide us with:

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- i. Prior to completion of the engagement, a written acknowledgment regarding the appropriateness of the procedures for [identify the intended purpose of the engagement; for example to assist users of the practitioner's report to monitor the financial performance of XYZ Fund]; and
- ii. At the conclusion of the engagement, with a letter that confirms certain representations made to us during the engagement

Our Report

We will issue a written report upon completion of the engagement. Our report will be addressed to [appropriate addressee] and will list the procedures performed and our findings. Our report will include statements that:

- a. You have acknowledged that the procedures performed are appropriate for [identify the intended purpose of the engagement; for example, to assist users of the practitioner's report to monitor the financial performance of XYZ Fund] and that the report may not be suitable for any other purpose; and
- b. No other party has acknowledged that the procedures performed are appropriate for their purposes.
- c. We do not accept any responsibility for the appropriateness of the procedures for any purpose.

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We cannot provide assurance that we may not make further modifications to our report as circumstances may arise in which it is necessary for us to report certain issues or to withdraw from the engagement. If, for any reason, we are unable to complete our engagement, we will not issue a report as a result of this engagement.

You agree to include our agreed-upon procedures report in any document containing the Statement of Investment Performance Statistics of XYZ Fund for the year ended December 31, 20X1 that indicates that we have performed procedures on such schedule and, prior to inclusion of the report, to ask our permission to do so.

Other Relevant Information

Our fees for these services. . .

[The practitioner may include language, such as the following, regarding limitation of or other arrangements regarding the liability of the practitioner or the entity, such as indemnification to the practitioner for liability arising from knowing misrepresentations to the practitioner by management (regulators may restrict or prohibit such liability limitation arrangements):]

You agree to hold us harmless and to release, indemnify, and defend us from any liability or costs, including attorney's fees, resulting from management's knowing misrepresentations to us or resulting from any actions

against us by third parties relying on the [identify the subject matter] described herein except for our own intentional wrongdoing.]

If you request us to perform additional services not contemplated or described in this engagement letter, we will provide you with a separate agreement describing those additional services and fees.

Please sign and return the attached copy of this letter to indicate your acknowledgment of, and agreement with, the arrangements for our engagement described herein.

Sincerely yours,

[Signature of practitioner or practitioner's firm]

Acknowledged and agreed on behalf of XYZ Fund by:

[Signed]

[Name and Title]

[Date]

Example 2: An Engagement Letter for an Engagement to Apply Agreed-Upon Procedures to Claims of Creditors

Circumstances include the following:

- The subject matter of the engagement is the claims of creditors of XYZ Company as of May 31, 20XX;
- The engaging party is the responsible party;
- The engaging party and the Trustee of XYZ Company have prescribed the procedures for the practitioner to perform and the practitioner is precluded from performing or designing additional procedures; and
- It is anticipated that the engaging party and the Trustee of XYZ Company will be the only parties that will acknowledge that the procedures performed are appropriate for the intended purpose of the engagement and that no other party will be requested to acknowledge that the procedures performed are appropriate for their purposes.

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To the appropriate representative of management of XYZ Company:⁴

⁴ The addressee and references on the engagement letter would be those that are appropriate in the circumstances of the agreed-upon procedures engagement, including the relevant jurisdiction. It is important to refer to the appropriate persons.

You⁵ have requested that we perform an agreed-upon procedures engagement on the claims of creditors of XYZ Company as of May 31, 20XX.⁶ We are pleased to confirm our acceptance and understanding of this engagement by means of this letter.

Our Understanding of the Nature of the Engagement

The following represents our understanding of the nature of this engagement:

- a. The intended purpose of the engagement is [identify the intended purpose of the engagement; for example, to assist you and the Trustee of XYZ Company regarding the financial status of XYZ Company];
- b. The agreed-upon procedures engagement is not required by any law, regulation, or contract;
- c. The procedures that we will perform were prescribed by you and the Trustee of XYZ Company and we are precluded from performing or designing additional procedures; and
- d. You and the Trustee of XYZ Company will acknowledge that the procedures performed are appropriate for the intended purpose of the engagement and no other party will be requested to acknowledge that the procedures performed are appropriate for their purposes.

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Our Responsibilities

The objective of our engagement is to

- a. Apply specific procedures to the claims of creditors of XYZ Company as of May 31, 20XX.
- b. Issue a written report that describes the procedures applied and our findings without providing an opinion or conclusion on the claims of creditors of XYZ Company as of May 31, 20XX.
- c. Communicate further as required by our professional standards and as appropriate.

We will conduct our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants and comply with the AICPA's Code of Professional Conduct, including ethical principles of integrity, objectivity, professional competence, and due care.

Because our engagement will not constitute an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively on the claims of creditors of XYZ Company as of May 31, 20XX, we will not express such an opinion or conclusion. If we were engaged to perform additional procedures, other matters might come to our attention that we would report to you.

⁵ Throughout this engagement letter, references to *you, we, us, management, and practitioner* would be used or amended as appropriate in the circumstances.

⁶ The practitioner may include reference to other services to be performed.

Our engagement cannot be relied upon to identify or disclose any misstatements in the claims of creditors of XYZ Company as of May 31, 20XX, including those caused by error or fraud, or to identify or disclose any wrongdoing within the Company or noncompliance with laws and regulations. However, we will inform the appropriate level of management of any material errors and any evidence or information that comes to our attention during the performance of the procedures that indicates fraud may have occurred. In addition, we will report to you any evidence or information that comes to our attention during the performance of the procedures regarding noncompliance with laws and regulations that may have occurred.

Your Responsibilities

You have the following overall responsibilities that are fundamental for our undertaking of the engagement:

- a. You are responsible for the claims of creditors of XYZ Company as of May 31, 20XX;
- b. To provide us with:

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- i. Prior to completion of the engagement, a written acknowledgment regarding the appropriateness of the procedures for [identify the intended purpose of the engagement; for example, to assist you and the Trustee of XYZ Company regarding the financial status of XYZ Company]; and
- ii. At the conclusion of the engagement, with a letter that confirms certain representations made to us during the engagement

Our Report

We will issue a written report upon completion of the engagement. Our report will be addressed to [appropriate addressee] and will list the procedures performed and our findings. Our report will include statements that:

- a. You and the Trustee of XYZ Company have acknowledged that the procedures performed are appropriate for [identify the intended purpose of the engagement; for example, to assist you and the Trustee of XYZ Company regarding the financial status of XYZ Company] and that the report may not be suitable for any other purpose; and
- b. No other party has acknowledged that the procedures performed are appropriate for their purposes.
- c. We do not accept any responsibility for the appropriateness of the procedures for any purpose.

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We cannot provide assurance that we may not make further modifications to our report as circumstances may arise in which it is necessary for us to report certain issues or to withdraw from the engagement. If, for any reason, we are unable to complete our engagement, we will not issue a report as a result of this engagement.

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You agree to include our agreed-upon procedures report in any document that indicates that we have performed procedures on the claims of creditors of XYZ Company as of May 31, 20XX and, prior to inclusion of the report, to ask our permission to do so.

Other Relevant Information

Our fees for these services . . .

[The practitioner may include language, such as the following, regarding limitation of or other arrangements regarding the liability of the practitioner or the entity, such as indemnification to the practitioner for liability arising from knowing misrepresentations to the practitioner by management (regulators may restrict or prohibit such liability limitation arrangements):]

You agree to hold us harmless and to release, indemnify, and defend us from any liability or costs, including attorney's fees, resulting from management's knowing misrepresentations to us or resulting from any actions against us by third parties relying on the [identify the subject matter] described herein except for our own intentional wrongdoing.]

If you request us to perform additional services not contemplated or described in this engagement letter, we will provide you with a separate agreement describing those additional services and fees.

Please sign and return the attached copy of this letter to indicate your acknowledgment of, and agreement with, the arrangements for our engagement described herein.

Sincerely yours,

[Signature of practitioner or practitioner's firm]

Acknowledged and agreed on behalf of XYZ Company by:

[Signed]

[Name and Title]

[Date]

.A68

Exhibit B —Illustrative Practitioner's Agreed-Upon Procedures Reports

The illustrative practitioner's agreed-upon procedures reports in this exhibit meet the applicable reporting requirements in paragraphs .35–.38. A practitioner may use alternative language in drafting an agreed-upon procedures report, provided that the language meets the applicable requirements in paragraphs .35–.38.

Example 1: Practitioner's Agreed-Upon Procedures Report Related to a Statement of Investment Performance Statistics

Circumstances include the following:

- The engaging party is the responsible party
- The practitioner has assisted in the development of the procedures
- No party other than the engaging party has acknowledged that the procedures are appropriate for their purposes

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Independent Accountant's Report

[Appropriate Addressee]

We have performed the procedures enumerated below on [*identify the subject matter, for example, the accompanying Statement of Investment Performance Statistics of XYZ Fund for the year ended December 31, 20X1*]. [*The engaging party, for example, XYZ Fund*] is responsible for [*the subject matter*].

The procedures performed were acknowledged by [*the engaging party, for example, XYZ Fund*] to be appropriate to meet the purpose of [*identify the intended purpose of the engagement; for example to assist users in understanding the Statement of Investment Performance Statistics of XYZ Fund for the year ended December 31, 20X1*]. No other party has acknowledged the appropriateness of the procedures. This report may not be suitable for any other purpose. We make no representation regarding the appropriateness of the procedures either for the purpose for which this report has been requested or for any other purpose. The procedures performed may not address all of the items of interest to a user and may not meet the needs of all users and, as such, users are responsible for determining whether the procedures performed are appropriate for their intended purpose.

An agreed-upon procedures engagement involves our performing specific procedures that [*the engaging party*] has acknowledged to be appropriate for the purpose of the engagement and reporting on findings based on the procedures performed.

[Include paragraphs to enumerate procedures and findings.]

This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to and did not conduct an examination or review engagement, the objective of which would be the expression of an opinion or conclusion, respectively, on [*identify the subject matter, for example, the accompanying Statement of Investment Performance Statistics of XYZ Fund for the year ended December 31, 20X1*]. Accordingly, we do not express such an opinion.

or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of XYZ Fund and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

[Additional paragraph(s) may be added to describe other matters.]

[Practitioner's signature]

[Practitioner's city and state]

[Date of practitioner's report]

Example 2: Practitioner's Agreed-Upon Procedures Report Related to Cash and Accounts Receivable

Circumstances include the following:

- The engaging party is not the responsible party
- Other than the engaging party, no other party has acknowledged that the procedures are appropriate for their purposes.

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Independent Accountant's Report

[Appropriate Addressee]

We have performed the procedures enumerated below on [identify the subject matter, for example, the cash and accounts receivable of XYZ Company as of December 31, 20XX, included in the accompanying information provided to us by management of ABC Company]. [The responsible party, for example, XYZ Company] is responsible for [the subject matter].

The procedures performed were acknowledged by [the engaging party, for example, ABC Company] to be appropriate to meet the purpose of [identify the intended purpose of the engagement; for example to assist users in understanding cash and accounts receivable of XYZ Company as of December 31, 20XX, included in the accompanying information provided to us by management of ABC Company]. No other party has acknowledged the appropriateness of the procedures. This report may not be suitable for any other purpose. We make no representation regarding the appropriateness of the procedures either for the purpose for which the report has been requested or for any other purpose. The procedures performed may not address all of the items of interest to a user and may not meet the needs of all users and, as such, users are responsible for determining whether the procedures performed are appropriate for their intended purpose.

An agreed-upon procedures engagement involves our performing specific procedures that [the engaging party] has acknowledged to be appropriate for the purpose of the engagement and reporting on findings based on the procedures performed.

The procedures and the associated findings are as follows:

Cash

1. For the four bank accounts listed below, we obtained

- a. the December 31, 20XX, bank reconciliations from XYZ Company management and
- b. the December 31, 20XX, general ledger from XYZ Company management.

2. We performed the following procedures:

a. Obtained a bank confirmation directly from each bank of the cash on deposit as of December 31, 20XX

b. Compared the balance confirmed by the bank to the amount shown on the respective bank reconciliations.

c. Mathematically checked the bank reconciliations

d. Compared the cash balances per book listed in the reconciliations below to the respective general ledger account balances.

<u>Cash, December 31, 20XX</u>		<u>Cash Balance</u>
<u>Bank</u>		<u>per Book</u>
DEF National Bank, general ledger account 123		\$ 5,000
LMN State Bank, general ledger account 124		3,776
RST Trust Company regular account, general ledger account 125		86,912
RST Trust Company payroll account, general ledger account 126		5,000
		<u>\$ 110,688</u>

We found no exceptions as a result of the procedures.

Accounts Receivable

3. We obtained the accounts receivable aged trial balance as of December 31, 20XX, from XYZ Company (attached as exhibit A). We mathematically checked that the individual customer account balance subtotals in the aged trial balance of accounts receivable agreed to the total accounts receivable per the aged trial balance. We compared the total accounts receivable per the accounts receivable aged trial balance to the total accounts receivable per general ledger account 250.

We found no exceptions as a result of the procedures.

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4. We obtained the accounts receivable subsidiary ledger as of December 31, 20XX, from XYZ Company. We compared the individual customer account balance subtotals shown in the accounts receivable aged trial balance (exhibit A) as of December 31, 20XX, to the balances shown in the accounts receivable subsidiary ledger.

We found no exceptions as a result of the procedures.

5. We selected 50 customer account balances from exhibit A by starting at the eighth item and selecting every fifteenth item thereafter until 50 were selected. The sample size selected represents 9.8 percent of the aggregate amount of the customer account balances. We obtained the corresponding invoices from XYZ Company and traced the aging (according to invoice dates) for the 50 customer account balances shown in exhibit A to the details of outstanding invoices in the accounts receivable subsidiary ledger.

We found no exceptions as a result of the procedures.

6. We mailed confirmations directly to the customers representing the 150 largest customer account balance subtotals selected from the accounts receivable aged trial balance, and we received responses as indicated below. As agreed, any individual differences in a customer account balance of less than \$300 were to be considered minor, and no further procedures were performed.

Of the 150 customer balances confirmed, we received responses from 140 customers; 10 customers did not reply.

No exceptions were identified in 120 of the confirmations received. The differences in the remaining 20 confirmation replies were less than \$300.

For the 10 customers that did not reply, we traced the items constituting the outstanding customer account balance to invoices and supporting shipping documents.

A summary of the confirmation results according to the respective aging categories is as follows.

Aging Categories	Accounts Receivable December 31, 20XX		
	Customer Account Balances	Confirmations Requested	Confirmations Received
Current	\$ 156,000	\$ 76,000	\$65,000
Past due:			
Less than one month	60,000	30,000	19,000
One to three months	36,000	18,000	10,000
Over three months	48,000	48,000	8,000
	\$300,000	\$172,000	\$102,000

This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to and did not conduct an examination or review engagement, the objective of which would be the expression of an opinion or conclusion, respectively, on [identify the subject matter]. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of ABC Company and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

[Additional paragraph(s) may be added to describe other matters.]

[Practitioner's signature]

[Practitioner's city and state]

[Date of practitioner's report]

Example 3: Practitioner's Agreed-Upon Procedures Report in Connection With Claims of Creditors

Circumstances include the following:

- The engaging party is the responsible party
- The engaging party and one specified party has prescribed the procedures for the practitioner to perform
- The practitioner is precluded from performing or designing additional procedures and has determined to restrict the use of the agreed-upon procedures report to the parties that prescribed the procedures
- The engaging party and the specified party have acknowledged that the procedures are appropriate for their purposes

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Independent Accountant's Report

[Appropriate Addressee]

We have performed the procedures enumerated below on [identify the subject matter, for example, the claims of creditors of XYZ Company as of May 31, 20XX, as set forth in the accompanying Schedule A]. [The engaging party, for example, XYZ Company] is responsible for [the subject matter].

The procedures performed were acknowledged by [the engaging party, for example, XYZ Company] to be appropriate to meet the purpose of [identify the intended purpose of the engagement; for example to assist users in understanding the claims of creditors of XYZ Company as of May 31, 20XX, as set forth in the accompanying Schedule A]. In addition, [specified party, for example, Trustee of XYZ Company] has also acknowledged the appropriateness of the procedures for their purposes. This report may not be suitable for any other purpose. We make no representation regarding the appropriateness of the procedures either for the purpose for which the report has been requested or for any other purpose. The procedures performed may not address all of the items of interest to a user and may not meet the needs of all users and, as such, users are responsible for determining whether the procedures performed are appropriate for their intended purpose.

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An agreed-upon procedures engagement involves our performing specific procedures that [*the engaging party*] has acknowledged to be appropriate for the purpose of the engagement and reporting on findings based on the procedures performed.

The procedures and associated findings are as follows:

1. Obtained the general ledger and the accounts payable trial balance as of May 31, 20XX, from XYZ Company. Compared the total of the accounts payable trial balance to the total accounts payable balance in general ledger account 450.

The total of the accounts payable trial balance agreed with the total accounts payable balance in the general ledger account number 450.

2. Obtained the claim form submitted by creditors in support of the amounts claimed from XYZ Company. Compared the creditor name and amounts from the claim form to the respective name and amounts shown in the accounts payable trial balance obtained in procedure 1. For any differences identified, requested XYZ Company to provide supporting detail. Compared such identified differences to the supporting detail provided.

All differences noted are presented in column 3 of Schedule A. Except for those amounts shown in column 4 of Schedule A, all such differences were agreed to [*describe supporting detail*].

3. Using the claim form obtained in procedure 2, compared the name and amount to invoices, and if applicable, receiving reports, provided by XYZ Company.

No exceptions were found as a result of this procedure.

This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to and did not conduct an examination or review engagement, the objective of which would be the expression of an opinion or conclusion, respectively, on [*identify the subject matter, for example, the accompanying Statement of Investment Performance Statistics of XYZ Fund for the year ended December 31, 20X1*]. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of XYZ Fund and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

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

[Additional paragraph(s) may be added to describe other matters.]

[Practitioner's signature]

[Practitioner's city and state]

[Date of practitioner's report]

Example 4: Practitioner's Agreed-Upon Procedures Report in Which Procedures are Specified in Regulation

Circumstances include the following:

- The engaging party is a regulator
- The procedures are prescribed in regulation
- The practitioner is precluded from performing or designing additional procedures and has determined to restrict the use of the agreed-upon procedures report to the engaging party and the regulator
- The engaging party has acknowledged that the procedures are appropriate for their purposes

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Independent Accountant's Report

[Appropriate Addressee]

We have performed the procedures enumerated below on [*identify the subject matter, for example, the financial accounts of the engaging party during the year ended December 31, 20XX*]. [*The engaging party*] is responsible for [*the subject matter*].

The procedures performed were acknowledged by [*the engaging party*] to be appropriate to meet the purpose of [*identify the intended purpose of the engagement; for example to assist users in understanding the financial accounts of the engaging party during the year ended December 31, 20XX*]. The procedures are specified in [*the regulation, for example, The State of XXX Legal Compliance Guide*]. This report may not be suitable for any other purpose. We make no representation regarding the appropriateness of the procedures either for the purpose for which the report has been requested or for any other purpose. The procedures performed may not address all of the items of interest to a user and may not meet the needs of all users and, as such, users are responsible for determining whether the procedures performed are appropriate for their intended purpose.

An agreed-upon procedures engagement involves our performing specific procedures that [*the engaging party*] has acknowledged to be appropriate for the purpose of the engagement and reporting on findings based on the procedures performed.

[Include paragraphs to enumerate procedures and findings.]

This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to and did not conduct an examination or review engagement, the objective of which would be the expression of an opinion or conclusion, respectively, on [*identify the subject*]. Accordingly, we do not express such an opinion or conclusion. Had we

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performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of [the engaging party] and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of [identify the specified parties, for example the engaging party and the State of XXX], and is not intended to be, and should not be, used by anyone other than these specified parties.

[Additional paragraph(s) may be added to describe other matters.]

[Practitioner's signature]

[Practitioner's city and state]

[Date of practitioner's report]