

INSIDE FRONT COVER OF CONSULTATION PAPER

The International Auditing and Assurance Standards Board (IAASB) is an independent standard-setting body. It develops auditing and assurance standards and guidance for use by all professional accountants under a shared standard-setting process involving the Public Interest Oversight Board (PIOB), which oversees the activities of the IAASB, and the IAASB Consultative Advisory Group (CAG), which provides public interest input into the development of the standards and guidance. The structures and processes that support the operations of the IAASB are facilitated by the International Federation of Accountants (IFAC).

The objective of the IAASB is to serve the public interest by setting high-quality standards dealing with auditing, review, other assurance, quality control, and related services, and by facilitating the convergence of national and international standards. This objective contributes to enhanced quality and consistency of practice in these areas throughout the world, and strengthened public confidence in financial reporting. A listing of the IAASB's pronouncements, including those currently under development, is included in Appendix 1 of this Consultation Paper.

The IAASB is required to be transparent in its activities, and to develop its international pronouncements following due process. An outline of the IAASB's due process, as approved by the PIOB, is presented in Appendix 2. Due process also applies to the setting of the IAASB's agenda. This Consultation Paper forms the most vital stage of that consultation process, and presents the IAASB's proposed strategy for 2012–2014, possible actions to implement the proposed strategy, and the basis for them. Appendix 3 describes the inputs that have been considered in developing this Consultation Paper, as well as the considerations in developing international pronouncements.

The IAASB consists of a full-time chairman and 17 volunteer members from around the world. It comprises an equal number of members in public practice with significant experience in the field of auditing and other assurance services, and individuals who are not in public practice ("non-practitioners"), including three public members. All Board members are required to sign an annual statement declaring that they will act in the public interest and with integrity in discharging their responsibilities. Member appointments are subject to the approval of the PIOB.

At present, the IAASB meets four times a year. The volunteer members' activities are divided between attendance and preparation time for IAASB meetings, and participation in project task forces. The IAASB is supported by seven full-time technical staff members.

IFAC's mission is to serve the public interest by strengthening the worldwide accountancy profession and contributing to the development of strong international economies by establishing and promoting adherence to high-quality professional standards, furthering the international convergence of such standards and speaking out on public interest issues where the profession's expertise is most relevant. The work of other IFAC Boards and Committees complements that of the IAASB.

[REVISED DRAFT] CONSULTATION PAPER
PROPOSED STRATEGY AND WORK PROGRAM FOR 2012–2014
CONTENTS

	Page
Chairman’s Statement	4
Issues Facing the Accounting Profession that Influence the IAASB’s Proposed Work Program	6
The IAASB’s Strategic Focus	7
Summary of Responses as to How the IAASB’s Time Could Be Allocated	8
The IAASB’s Key Stakeholders	9
Overview of Possible Actions to Implement the Proposed Strategy	11
Guide for Respondents	16
Further Discussion on Key Elements of This Consultation	17
I. Outreach and Communications Activities	17
Communicating about the Value and Benefits of Adopting the Clarified ISAs	18
Working with Others to Promote Adoption of the Clarified ISAs	18
Public Sector Considerations	18
Outreach with Investors and Others	20
II. Contributing to Fundamental Debates through the Current Work Program	20
Audit Quality	20
Auditor Communications	22
Auditing Financial Statement Disclosures	22
ISA Implementation Monitoring	23
The Needs of SMEs and SMPs	24
Academic Research	25
III. Rationale for Proposed New Projects to Be Commenced in 2012–2014	26
Responding to the Findings of the ISA Implementation Monitoring Project	26
Revising the Standard Dealing with Agreed-Upon Procedures Engagements	27
Revising or Withdrawing the Standard on Prospective Financial Information	27
Communicating about the Benefits of Adopting the Clarified ISAs	27
Identifying Implementation Challenges and Developing Materials to Respond to	

These Challenges	28
Seeking Feedback on Implementation Experiences with ISAE 3402	29
IV. Suggestions for Additional New Projects	30
Developing Guidance for the Audits of Banks	30
Evaluating Whether to Develop a New ISAE Addressing Sustainability Reporting	31
Evaluating Whether to Develop a New ISAE Addressing Assurance on Corporate Governance Statements.....	31
Evaluating Whether to Develop a New ISAE Addressing Assurance on Internal Control	32
Redrafting the Standard Dealing with Reviews of Interim Financial Information in the Clarity Format	32
Considering Further Actions to Assist in the Implementation of ISQC 1	32
Appendix 1: The IAASB’s International Pronouncements	34
Appendix 2: Key Elements of Due Process	36
Appendix 3: Inputs to the IAASB’s Processes	38
Appendix 4: Current (Ongoing) Actions the IAASB Intends to Continue	40
Appendix 5: ISAs and ISQC Redrafted but Not Revised as Part of the Clarity Project	41

Chairman’s Statement

Since the completion of the Clarity Project,¹ the IAASB has been working in accordance with its [Strategy and Work Program, 2009–2011](#) (current Strategy or current Work Program). Delivering on our strategy to date has meant promoting the adoption of the clarified International Standards on Auditing (ISAs) and supporting their effective implementation. It has also meant focusing our standard-setting activities on areas where there is a demand for new and innovative assurance and related services standards.

Since the finalization of our current work program in July 2008, the events of the global financial crisis have heightened the attention on the role of the audit and the broader accountancy profession. At times of financial instability, investors and others look to reduce the level of uncertainty in their decisions by seeking information they know to be reliable as a basis for those decisions. The demand for reliable information is at the heart of the IAASB’s mandate to strengthen public confidence in financial reporting through high-quality standards governing audit and assurance services.²

In these turbulent times, the IAASB has placed particular emphasis on engaging in dialogue with key stakeholders. Much effort has been directed at liaising with the international regulatory community including the International Forum of Independent Audit Regulators (IFIAR) and the International Organization of Securities Commissions (IOSCO). Equally, the IAASB continues to strengthen its relationships with the International Accounting Standards Board (IASB), the U.S. Public Company Accounting Oversight Board (PCAOB), the Financial Stability Board (FSB), the Basel Committee on Banking Supervision (BCBS), the European Commission (EC), and National Standard Setters (NSS). Liaison with IFAC Member Bodies, the IFAC Small and Medium Practices (SMP) Committee, the Forum of Firms and country outreach visits have kept the IAASB informed about the challenges “on the ground” by those adopting and implementing the clarified ISAs, from sole practitioners to the largest firms. Focus on effective outreach activities is a core part of our work, and is critical to informing our standard-setting priorities and promoting the adoption and effective implementation of our international pronouncements.

Collaboration with these organizations and other stakeholders is essential. Many of them are exploring lessons learned from the global financial crisis and will undoubtedly inform the debate about whether and, if so, how the role of the auditor and the auditor’s reports may need to evolve in order for audits to remain “fit for purpose.” For example, the EC’s Green Paper³ covers a wide variety of audit-related topics such as concentration in the audit market (including how smaller firms can gain access to larger audits), possible simplification of rules for SMPs and small- and medium-sized entities (SMEs), and auditing standards, including the EC’s consideration of adoption of ISAs in the European Union (EU).

¹ The Clarity Project involved the application of new drafting conventions to all International Standards on Auditing (ISAs), either as part of a substantive revision or through a limited redrafting, to reflect the new conventions and matters of clarity generally. Further information about Clarity Project, including the improvements arising from the project, can be accessed at www.iaasb.org/clarity-center.

² Appendix 1 lists the IAASB’s pronouncements, including those currently in development.

³ Green Paper, *Audit Policy: Lessons from the Crisis*, issued October 2010

Our current Work Program, developed before the effects of the global financial crisis were fully known, already responds to a number of areas that are on the minds of the EC and others. Most notably is our work to explore whether the auditor's report and other communications convey appropriate information in a way that reflects the value of an audit, is understandable to users, and meets their information needs. Further, our work to explore the topic of audit quality, and the role of standards in promoting it, is relevant to broader policy discussions on maintaining confidence in financial reporting. This is done in the context of not only capital markets, but also the public sector and reporting by private or non-public entities.

Further, we are monitoring the implementation of the clarified ISAs, taking steps to strengthen specific ISAs, and to study the auditor's work on disclosures and other information included in documents containing audited financial statements. At the same time, the IAASB is working on the development of new standards and guidance for broader assurance and related services engagements. This includes standards for services that address the unique needs of SMEs and SMPs, standards relevant to financial information in securities offerings in particular, and standards that respond to developments in corporate reporting, such as reporting on greenhouse gas emissions.

As the IAASB undertakes work in these new but highly important areas, it has found that more time is required for deliberations than initially anticipated. While this does not represent a slow-down in the IAASB's progress of its work program, it is important that the Board takes the time necessary to ensure that issues are explored fully, thereby ensuring the quality of its future proposals. Looking ahead, I anticipate that a number of our current initiatives will continue into 2011 and 2012, in particular as we delve into broad issues important to the public interest and as we continue to seek to respond to emerging demands for assurance in new areas. It will also be important that the IAASB has the capacity to respond to any significant matters identified as the clarified ISAs are being implemented, so that these standards achieve their intended objectives and are applied consistently.

Balancing the time spent on development or revision of standards, promoting their adoption, and responding to concerns arising from implementation, while remaining flexible to new developments, will be a challenge. For this reason, it is critical that we hear from interested parties about where our future time should be spent on new projects to best meet our public interest mandate, while acknowledging the resource limitations. I encourage you to input to this Consultation Paper (CP).

Issues Facing the Accounting Profession that Influence the IAASB’s Proposed Work Program

1. Respondents to the April 2010 IAASB strategy survey to inform this CP were asked to identify issues facing the accounting profession that should influence the IAASB’s strategy. Three main themes emerged from these responses:
 - (a) The perception that the role of the auditor, and the value of the audit, as envisioned by the current ISAs is not well-understood by stakeholders and acknowledgment of the current debates in some jurisdictions whether the role of the auditor needs to evolve in order for an audit to remain a relevant and valued service is necessary.
 - (b) SMPs need (a) resources to help them interpret and apply the ISAs to ensure compliance on an appropriate and proportional basis when audits are conducted, and (b) clearly defined other assurance and related services to address the needs of users when an audit is not required or requested.
 - (c) Certain areas of the audit are becoming more challenging because of the rapid dynamic changes of the accounting standards and the economic environment, including fair value accounting measurements, complex financial instruments, disclosure requirements, going concern uncertainties, and impairments.
2. These themes are consistent with the findings of IFAC’s Business Reporting Project Group,⁴ which also highlighted issues associated with corporate governance of entities, the need to improve the understanding among financial reporting stakeholders of the benefits of an audit, and concerns over the usefulness of financial reports generally.
3. The IAASB recognizes that these issues are potentially far-reaching and, as a result, pose challenges for the IAASB in setting its priorities. For example, they raise questions about how best to direct the IAASB’s time and resources to meet the expectations of stakeholders, including the following:
 - Balancing the demands for the IAASB to focus on its core products (standards and guidance), while also recognizing the importance of the IAASB’s activities to promote their adoption and support their effective implementation.
 - Balancing the need to ensure the ISAs keep up-to-date with current developments in financial reporting and remain relevant, while also being agile enough to respond to the need for standards and guidance to support new and emerging assurance services.
 - Balancing the need to set standards that meet the needs of capital markets, while also meeting the needs of SMEs that are equally important to the global economy.
 - Balancing the need to be seen to be responding on a timely basis, while also adhering to due process to ensure the issues are fully understood, alternatives are explored, and

⁴ This group plans to develop an International Good Practice Guidance, *Evaluating and Improving Business Reporting in Organizations*. Further information about the project can be found at www.ifac.org/frsc/index.php.

the views of all stakeholders are taken into account, which is essential to the quality of the standards and ensuring they meet the public interest.

4. A number of the activities the IAASB is currently undertaking already respond to a number of the issues identified by the survey respondents. Indeed, respondents noted strong support for the projects currently on the IAASB's agenda, many of which will continue into 2011 and 2012. Accordingly, the IAASB believes it is important first to ensure that the goals of the current work program are adequately achieved before embarking on new standard-setting projects as a means of responding to the issues identified in the survey. Current initiatives that will have an ongoing effect are highlighted in this Paper.
5. The IAASB also recognizes that legislators, regulators, and others, such as the EC, are in the process of implementing responses to the global financial crisis. The IAASB recognizes that issues such as this need to be taken on a broad basis and require the participation of many stakeholders, including users of financial statements, regulators and legislators that require audits to be performed, entities and their governance structures that pay for audit services, standard setters (including the IAASB), and the auditing profession.
6. The IAASB recognizes that it can contribute to, but not determine, the outcome of debates on possibly changing the role of auditors. Nevertheless, the IAASB feels it is important to be sufficiently engaged in the dialogue and debates in order to be able to judge if and when standard setting has a role to play in shaping the auditing profession in the future. Furthermore, to the extent that the IAASB can facilitate these discussions, the IAASB believes it should seek to take a more active role in this regard.

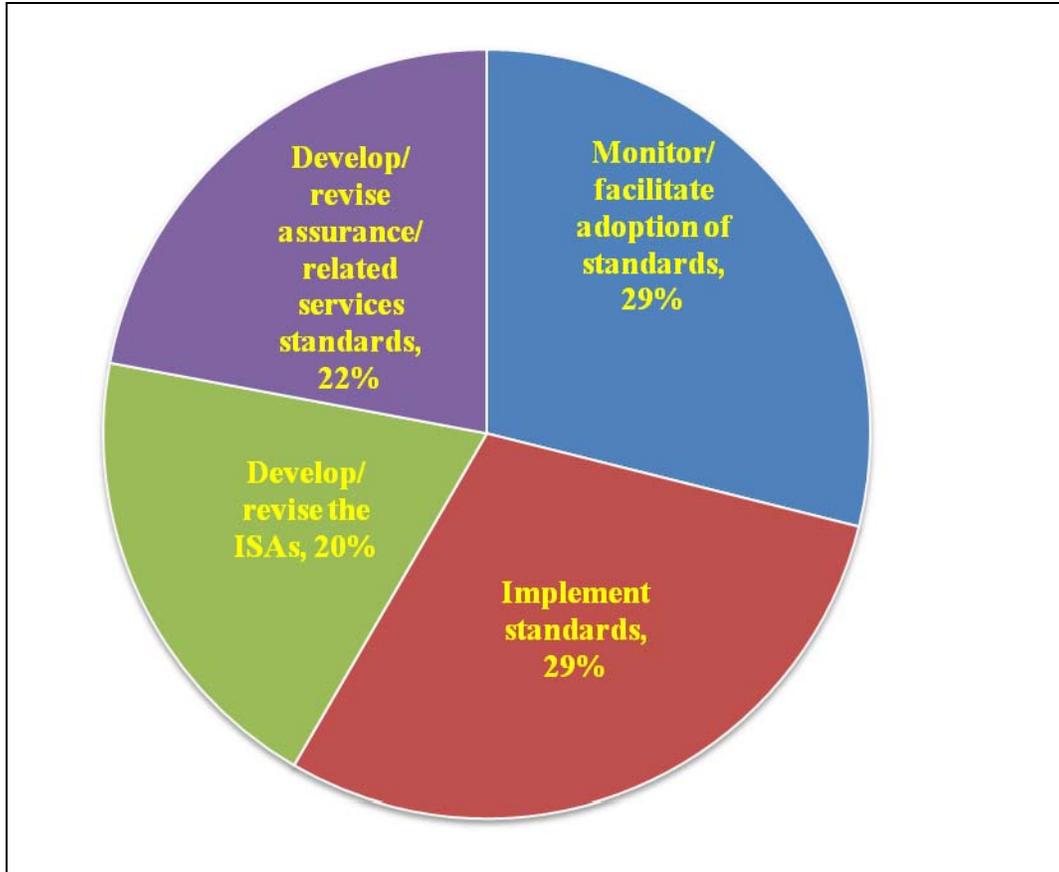
The IAASB's Strategic Focus

7. Developed after an extensive consultation process, the current Strategy focuses on the following three areas:
 - (a) Development (and revision) of standards (and pronouncements); with focus on, amongst others, standards that facilitate the effective operation of the world's capital markets, those that respond to demand for other assurance services, and those that address the needs of SMEs and SMPs;
 - (b) Monitoring and facilitating adoption of those standards; and
 - (c) Responding to concerns about the implementation of the standards by activities designed to improve the consistency with which they are applied in practice.
8. Respondents to the strategy survey confirmed these areas of strategic focus remain appropriate. In addition, while individual classes of stakeholders had differing views about how the IAASB's time could be allocated across the three areas,⁵ in particular about the time to be spent developing ISAs versus other standards, the message was clear—their expectation is that the IAASB needs to do more with respect to adoption and implementation of its

⁵ Ranges for the allocations were as follows: Developing/revising ISAs –1–53%; Developing/revising assurance and related services standards –5–60%; Monitoring/facilitating adoption of standards –10–60%; and Implement standards –5–75%.

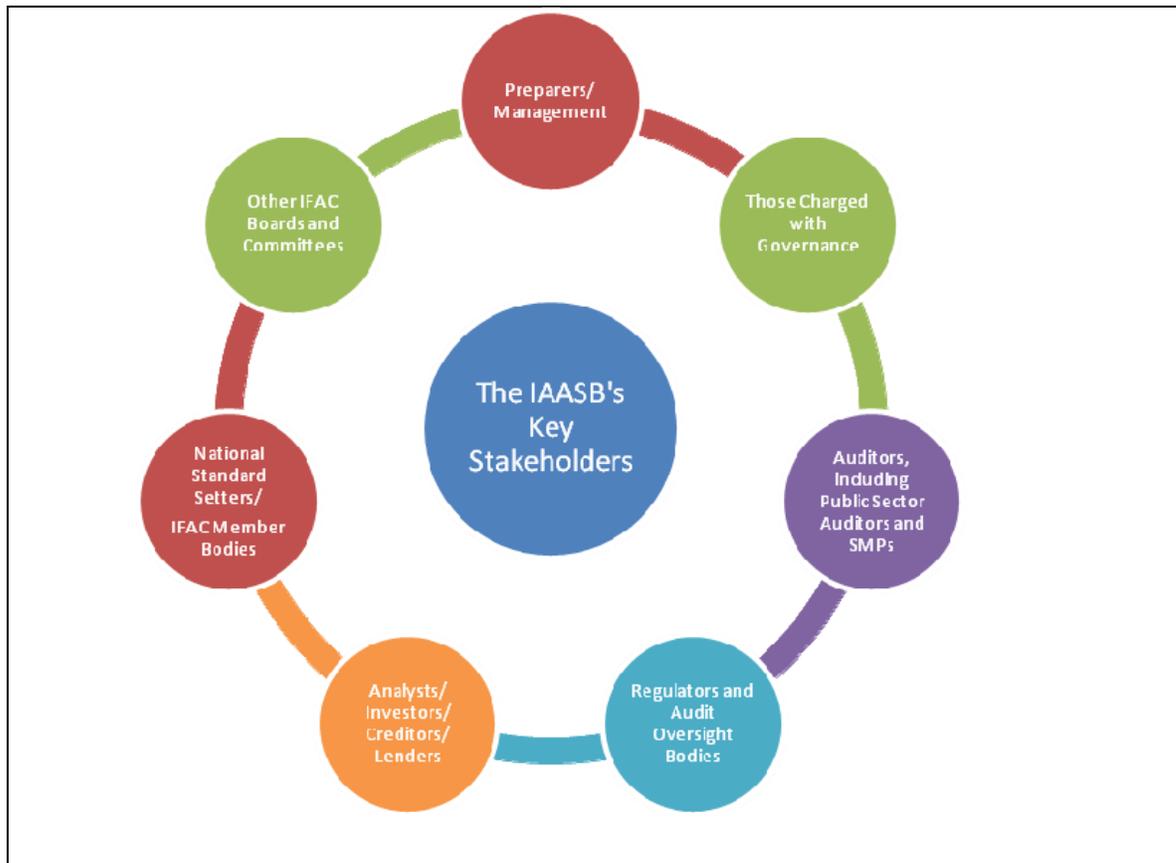
standards. The following chart illustrates the summary of responses as to how the IAASB’s resources could be allocated.

Summary of Responses as to How the IAASB’s Time Could Be Allocated



9. This is not an unexpected result. There is demand for assurance on other information to help support regulatory regimes, for example on carbon emission information. However, adoption and implementation primarily are at the forefront of stakeholders’ minds as the clarified ISAs are now effective. It also is not taken to mean a need for a fundamental shift in the IAASB’s longer-term standard-setting mandate, as the IAASB continues to believe that its primary public interest mandate is to set high-quality standards. However, this allocation represents the circumstances and conditions in the medium-term to which the IAASB should respond in order for the goals of the Clarity Project to be realized—enhancing the consistency and quality of audits worldwide.
10. In addition, while NSS, legislators and regulators are typically responsible for developing adoption and/or convergence plans or requiring compliance with the ISAs, their successful implementation cannot be achieved without the efforts of IFAC member bodies, audit firms, audit practitioners and others. Accordingly, an important part of the IAASB’s work is outreach and mutual collaboration with stakeholders broadly and at key stages of the IAASB’s projects. The following chart illustrates the IAASB’s interaction with key stakeholders.

The IAASB's Key Stakeholders



The IAASB's outreach and communications activities, including those envisioned for the future strategy period, are described in *Further Discussion on Key Elements of This Paper – Section I* and paragraphs 55–56 of this Paper.

11. Nevertheless, taking into account the aforementioned responses from the survey, the IAASB generally agrees that its three areas of strategic focus remain appropriate. The IAASB is conscious of the importance of the need for continued focus on ISAs. Indeed, revisions to certain ISAs, exploration of issues relating to broader topics such as auditor communications and disclosures, and responding to the findings of the ISA Implementation Monitoring Project, are key to continuing to promote audit quality. The IAASB believes that, because they provide a global benchmark for audits of financial statements, consistent application of the ISAs is a means of enhancing the degree of confidence of intended users in the financial statements.⁶ It is also through this focus that the IAASB can play its role in promoting financial stability in light of the lessons learned from the global financial crisis.

⁶ As noted in *Challenges and Successes in Implementing International Standards: Achieving Convergence to IFRSs and ISAs* (Wong Report; 2004), “High quality standards of financial reporting, auditing, and ethics underpin the trust that investors place in financial and non-financial information and, thus, play an integral role in contributing to a country's economic growth and financial stability.”

12. The following table contains an overview of possible projects and actions to implement the proposed strategy. This has been developed taking into account discussion with the IAASB CAG, debates flowing from projects on IAASB’s current agenda, and the results of the initial strategy survey. The projects are classified based on the three areas of strategic focus, which the IAASB believes remain appropriate. The projects have been further categorized as follows:
- Current Projects (Column A) – Projects on the IAASB’s current agenda that are expected to extend into 2012. These have been incorporated into the table to give context to the level of the IAASB’s activity during 2012–2014. Project histories for these projects, including their objectives, can be found at www.iaasb.org/Projects.php. See *Further Discussion on Key Elements of This Paper – Section II*.
 - Proposed New Projects to Commence in 2012–2014 (Column B) – Projects identified via consultation which the IAASB believes should be added to its work program. Some of these projects were anticipated in the current work program and have not yet commenced. *Further Discussion on Key Elements of This Paper – Section III* explains the IAASB’s rationale in proposing to add these projects to its work program.
 - Suggestions for Additional New Projects (Column C) – These projects were suggested by respondents to the strategy survey or have been raised by others during consultation. *Further Discussion on Key Elements of This Paper – Section IV* provides context to these recommendations, including some matters that may need to be considered if respondents believe one or more of these actions should be added to the future work program.
13. Appendix 4 contains a list of current (ongoing) actions, which the IAASB intends to continue during 2012–2014. Many of these activities are the primary means by which the IAASB promotes the adoption and implementation of its standards. While not necessarily activities on which the Board itself currently spends a significant amount of time, meaningful staff time is devoted to these efforts, which in turn reduces the amount of time available for technical projects.

Overview of Possible Actions to Implement the Proposed Strategy

Development and Revision of Its Standards		
Maintaining a Commitment to the ISAs and the Audit		
Current Projects (Column A)	Proposed New Projects to Commence in 2012–2014 (Column B)	Suggestions for Additional New Projects (Column C)
<ul style="list-style-type: none"> Finalize the revision of ISA 720, <i>The Auditor’s Responsibilities Relating to Other Information in Documents Containing Audited Financial Statements</i>. Conclude on actions to be taken as a result of the research on the standard auditor’s report (including ISA 700, <i>Forming an Opinion and Reporting on Financial Statements</i>). Continue to monitor developments in accounting standards to determine whether these may lead to a need for new or revised auditing standards, or further guidance. Develop a new ISA or guidance on auditing financial statement disclosures. 	<ul style="list-style-type: none"> Undertake new project(s) to respond to findings of the ISA Implementation Monitoring project, in consultation with the IAASB CAG—output in the form of a revised ISA(s), new ISA, IAPS, or other form, as deemed appropriate. 	<ul style="list-style-type: none"> In consultation with banking regulators and supervisors, consider undertaking a project with regard to IAPS 1004, <i>The Relationship between Banking Supervisors and Banks’ External Auditors</i>, and IAPS 1006, <i>Audits of the Financial Statements of Banks</i>, for the audit of banks.

Enhancing Public Confidence through the Development or Revision of Assurance and Other Standards that Respond to Demands of Users of Financial Information		
Current Projects (Column A)	Proposed New Projects to Commence in 2012–2014 (Column B)	Suggestions for Additional New Projects (Column C)
<ul style="list-style-type: none"> Finalize the revision of ISAE 3000, <i>Assurance Engagements Other than Audits or Reviews of Historical Financial Information</i>. Finalize the development of new ISAE 3410, <i>Assurance on a Greenhouse Gas Statement</i>. Finalize the revisions of ISRE 2400, <i>Engagements to Review Financial Statements</i>, and ISRS 4410, <i>Engagements to Compile Financial Statements</i>. Conclude on actions to be taken with regard to eXtensible Business Reporting Language (XBRL). 	<ul style="list-style-type: none"> Revise ISRS 4400, <i>Engagements to Perform Agreed-upon Procedures Regarding Financial Information</i>. Determine whether to revise or withdraw ISAE 3400, <i>The Examination of Prospective Financial Information</i>. 	<ul style="list-style-type: none"> Evaluate whether to develop a new ISAE addressing assurance on sustainability reporting. Evaluate whether to develop a new ISAE addressing assurance on corporate governance statements. Evaluate whether to develop a new ISAE addressing assurance on internal control. Redraft ISRE 2410, <i>Review of Interim Financial Information Performed by the Independent Auditor of the Entity</i>, in the Clarity format.

Monitoring and Facilitating Adoption of Its Standards		
Communicating about the Benefits of Adopting the ISAs		
Current Projects (Column A)	Proposed New Projects to Commence in 2012–2014 (Column B)	Suggestions for Additional New Projects (Column C)
<ul style="list-style-type: none"> • Continue work on the audit quality initiative. • Develop a publication on the meaning of an audit. • Continue communication and other outreach initiatives described in Appendix 4. 	<ul style="list-style-type: none"> • Develop an overall publication explaining the benefits of adopting the ISAs, with a specific focus on explaining how ISAs can be applied by SMPs and in the public sector, and consider whether other publications should be developed to further promote adoption and implementation of the IAASB’s standards.⁷ 	
Responding to Concerns about Implementation of Its Standards		
Current Projects (Column A)	Proposed New Projects to Commence in 2012–2014 (Column B)⁸	Suggestions for Additional New Projects (Column C)
	<ul style="list-style-type: none"> • Through the ISA Implementation Monitoring project and other outreach activities, take a proactive role in identifying implementation challenges and 	<ul style="list-style-type: none"> • In connection with the SMP Committee and other interested parties, consider what further actions can be taken to assist in the implementation of International Standard

⁷ Other proposed enhancements to the IAASB’s communications and outreach activities are described in more detail in paragraphs 22–30.

⁸ Depending on the proposed output of the project(s) to respond to findings of the ISA Implementation Monitoring project, the anticipated new project(s) under the “Development and Revision of Its Standards” section may be more appropriately classified as “Developing Implementation Guidance.”

	<p>seek to develop materials aimed at addressing these challenges, working with NSS, IFAC member bodies and others.</p> <ul style="list-style-type: none"> • Seek feedback from service organizations, service auditors, user entities, user auditors, and others on their experiences with the implementation of ISAE 3402, <i>Assurance Reports on Controls at a Service Organization</i>. 	<p>on Quality Control (ISQC) 1, <i>Quality Control for Firms that Perform Audits and Reviews of Financial Statements, and Other Assurance and Related Services Engagements</i>, for smaller firms.</p>
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Supplementary Information Used in Determining the IAASB’s Capacity for New Projects for 2012–2014

Annually the IAASB, in conjunction with the IAASB CAG, considers the projects on its current and future agenda and may reprioritize as necessary.

Balance of Resources between the IAASB, Its Chairman and Its Staff

As the IAASB members participate on a volunteer basis, there are limitations on the available Board time that can be devoted to particular projects.

Project task forces, which are chaired by IAASB members, and comprise IAASB members, IAASB technical advisors, and others with relevant expertise, typically meet at least once between each IAASB meeting. Each IAASB member ordinarily participates in two or more project task forces.

Board members may be asked to participate in the IAASB CAG meetings and liaison meetings with NSS, and outreach activities in their particular jurisdictions. In addition, IAASB members may also elect to participate in the IAASB’s liaison activities with the IASB via working groups having the goal of providing the IASB with timely inputs on aspects of its proposed standards that may have potential verifiability or auditability issues.

The full-time IAASB Chairman undertakes a significant level of outreach activity, speaking at conferences and meetings of organizations interested in the work of the IAASB, engaging in dialogue with key stakeholders moving ahead with adoption of the ISAs, participating in discussions about the regulatory environment in which auditors operate, and furthering the work of the IAASB in

a number of forums.

In addition to managing projects, IAASB Staff develop publications such as Staff Audit Practice Alerts, Staff Questions and Answers, press releases and project updates for individual projects, explanatory memorandums that accompany exposure drafts, and bases for conclusions that accompany final pronouncements. They are also involved in liaison activities and prepare relevant materials to support IAASB communication activities and the Chairman's outreach efforts. Staff also support the agendas for the semi-annual IAASB CAG and annual IAASB-NSS liaison meetings, and have responsibility for reporting to IFAC and the PIOB.

Key Assumptions

The IAASB's future work program will be based on the following key assumptions:

- The existing staff structure of seven full-time technical staff members remains unchanged.
- The IAASB meets for five days, four times per year. Approximately six projects can be discussed at each IAASB meeting, depending on the stage of the project.
- Detailed work on projects is undertaken by task forces drawn from the membership of the IAASB and which may include representatives nominated by INTOSAI or from other relevant organizations.
- The development of all standards and pronouncements is done following due process. This includes consultation with the IAASB CAG and public exposure. Each project takes approximately 36 months to complete, however, the overall time needed is also dependent on the complexity of the subject matter.
- The commencement of any new project, including the proposed new projects to be commenced in 2012–2014 and any additional new projects (Columns B and C), are subject to board approval of a project proposal.
- The future work program includes time to allow for research activities, education sessions to further inform the IAASB's debates, outreach and direct interaction with interested stakeholders, and development of communications relating to individual projects.

Guide for Respondents

14. The IAASB invites comments on any aspect of the proposed strategy and possible actions. In particular, it would be helpful if respondents' comments could include the following:
- (a) Whether the IAASB's three areas of strategic focus noted in paragraphs 7–11 remain appropriate;
 - (b) Whether the list of proposed new projects to be commenced in 2012–2014 (Column B) adequately responds to issues currently facing the accounting profession, in particular:
 - (i) Whether respondents support the IAASB undertaking work in these areas and, if not, the reasons why a particular project(s) would not be supported;
 - (ii) Whether respondents believe these projects are consistent with the IAASB's three areas of strategic focus; and
 - (iii) How these proposed new projects should be prioritized in light of the current projects (Column A).
 - (c) Which of the suggestions for additional new projects (Column C), if any, should be considered for inclusion on the future work program, and how those actions should be prioritized in light of the current projects (Column A) and proposed new projects to be commenced in 2012–2014 (Column B);
 - (d) Whether any particular project(s) in Column C would not be supported; and
 - (e) How additional actions identified by respondents, if any, should be prioritized in relation to the projects identified in Columns B and C.

The IAASB intends to devote the majority of its efforts on the projects in Column A through 2011 and into 2012 to progress these projects on a timely basis. Should respondents support the majority of the proposed new projects to be commenced in 2012–2014 (Column B), the IAASB currently anticipates it will be able to commence 3 new projects from the list of suggested new projects (Column C) during 2012–2014. Respondents are therefore specifically asked to select the top three projects either from, or in addition to, the list of suggestions for additional new projects (Column C) that they believe would best meet the IAASB's public interest mandate.

15. In addition, the IAASB would welcome comments from SMEs, SMPs and those in developing nations as to the following:
- (a) What types of publications or further implementation guidance may be of most use to promote the adoption and implementation of the clarified ISAs; and
 - (b) What opportunities may exist for the IAASB to partner with others to facilitate implementation of the clarified ISAs (for example, IFAC Member Bodies, NSS, training organizations, and others)?

Further Discussion on Key Elements of This Consultation

I. Outreach and Communication Activities

16. Outreach and communication remain important priorities for the IAASB. The three most commonly cited barriers to adoption of the ISAs in the strategy survey were the challenges in adopting auditing standards into law or regulation, difficulties with translation, and the length and complexity of the standards themselves. Respondents to the survey believed the IAASB should take a more active role in promoting the adoption of the ISAs, in particular the adoption of the ISAs by the EC and promotion of their use by SMPs, public sector auditors, and in developing nations and emerging economies. It was also suggested the IAASB should continue to liaise with the PCAOB in the United States (U.S.) to work towards further convergence of auditing standards for public companies.
17. The IAASB is pleased to hear of positive developments regarding the adoption of the clarified ISAs at the national level. A number of countries including Australia, Brazil, Canada, Hong Kong, Malaysia, New Zealand, Norway, South Africa and Switzerland have adopted the clarified ISAs in line with the IAASB's effective date. In addition, others are also moving towards implementing the clarified ISAs, including China, Japan, and the U.S. (for private companies).
18. Adoption of ISAs for statutory audits in the EU under the EC's 8th Company Law Directive remains an important strategic objective. The IAASB has been engaging with key EC representatives to progress this important initiative. The IAASB notes with regret the EC's deferral of its adoption of the clarified ISAs for use in the EU arising from its decision to first issue a Green Paper on accounting and auditing policy in the EU. Within the Green Paper, however, the EC notes, as a result of its consultation in 2009, the overall support in the EU to an adoption of the ISAs at EU level and that it is considering when and how to introduce ISAs in the EU.
19. Nonetheless, a number of individual EU Member States have moved ahead with adoption plans. At the time of writing this paper, at least 18 (out of 27) EU Member States have adopted or set out their initiatives to adopt the ISAs within their jurisdictions, noted in the Green Paper as a majority of EU Member States, and the clarified ISAs are also being applied by the major networks of audit firms. The IAASB intends to continue to proactively connect with individual EU countries, in particular those that have yet to adopt the clarified ISAs.
20. While acknowledging that the IAASB regularly engages key stakeholders, many respondents to the strategy survey cited communications as an area on which the IAASB could improve. The IAASB has a number of communications activities aimed at keeping its stakeholders informed of its activities that it intends to continue, but it will also consider new activities designed at enhancing its core messages and ensuring the IAASB is viewed as an global standard-setter with expertise on key matters.
21. The IAASB's communication and liaison activities will be continued and, in some cases, enhanced to (a) promote adoption of the clarified ISAs and share the IAASB's views that these ISAs can be applied by SMPs, public sector auditors and others, (b) obtain feedback on

implementation challenges in order to be in a position to appropriately respond, and (c) interact more directly with investors and other stakeholders to obtain their input into the IAASB’s standard-setting process. This includes interaction with other IFAC Boards and Committees, who are likely to have valuable input and whose agendas may interact with that of the IAASB. Enhancements to these activities are described in more detail below.

Communicating about the Value and Benefit of an Audit Conducted in Accordance with the Clarified ISAs

22. Communication about the value and benefit of an audit conducted in accordance with the clarified ISAs was suggested as a necessary future communication to better explain the role of audit. The current work program includes plans for the discussion of a publication on the “Meaning of an Audit,” which will be tailored to further address the expectation gap and communicate on the nature and purpose of an audit. The timing of this publication is currently linked to the finalization of the IAASB’s project to revise the review and compilation standards in order to more clearly differentiate the various services and the levels of assurance they may provide (planned for late 2011).

Working with Others to Promote Adoption of the Clarified ISAs

23. During 2010, outreach activities were undertaken with jurisdictions that have committed to adopting the ISAs, and meetings have been conducted with NSS, regulators and audit oversight bodies, investor groups, academia, and legislators. This important activity is expected to continue in 2011 and beyond, including the ongoing activities to encourage the adoption of the ISAs for statutory audits in the EU. The IAASB also intends to leverage contacts of other IFAC Boards and Committees, in particular the Professional Accounting Organization Development Committee (PAODC)⁹ and its relationship with the World Bank and the IFAC Compliance Advisory Panel (CAP). Doing so will allow the IAASB to further promote the adoption of its standards and engage in a dialogue about barriers to adoption in the hopes of eliminating or minimizing those barriers.

Public Sector Considerations

24. The IAASB and INTOSAI collaborate on matters of mutual interest relating to financial audits under a formal Memorandum of Understanding. In developing the clarified ISAs, the IAASB gave particular attention to develop considerations specific the public sector. Respondents to the survey were of the view, however, that more could be done to promote the adoption of the ISAs in the public sector. INTOSAI uses the ISAs as the basis for their International Standards of Supreme Audit Institutions for financial audit (ISSAIs for financial audit or Financial Audit Guidelines), which incorporate additional guidance for public sector auditors on applying ISAs when performing financial audits. The IAASB commends INTOSAI on finalizing its set of ISSAIs for financial audit, as it supports the IAASB’s views

⁹ The PAODC, formerly the Developing National Committee, supports capacity building of the accountancy profession in all regions of the world and, through its outreach activities, assists the IAASB in obtaining the views of developing nations seeking to adopt and implement the ISAs.

that public sector audits of financial statements can and should be carried out in accordance with ISAs.

25. However, the IAASB recognizes there is more to be done in our mutually beneficial relationship to ensure that public sector auditors understand why the same auditing standards can be applied for both private and public sector entities. In addition, further coordination with INTOSAI in the future may lead to leveraging of the IAASB's other standards for use in the public sector, for example when public sector auditors are involved in performance reporting, a form of assurance engagement. Public sector auditors within Supreme Audit Institutions (SAIs) (such as Auditors General) also have a mandate to promote improved financial reporting and auditing practice and often have direct reporting responsibilities to key persons within the legislative process. Accordingly, the IAASB will explore whether its collaboration with INTOSAI can also be used to further enhance relationships with legislators, for example through the involvement of individual SAIs.

Outreach with Investors and Others

26. Respondents to the survey also widely supported the IAASB expanding its communications with users, including investors. Some suggested that additional communications are also necessary between auditors and those charged with governance and shareholders outside of the auditor's report. Suggestions on how to further engage investors in the work of the IAASB include roundtables and regional forums conducted with regulators and NSS; investor working groups; webcasts; surveys; user-focused newsletters and web publications.
27. Respondents also suggested the IAASB could strengthen liaison with stock exchanges, CFOs and controllers, corporate governance organizations, and shareholder associations. While a number of these organizations are represented on the IAASB CAG, it may be necessary for activities with these groups to be expanded.
28. These suggestions mirror efforts underway by the IASB and the PCAOB. The IAASB intends to explore additional communication and outreach efforts that could be employed in the context of individual projects, so that all available methods of outreach and communication are considered and the approach is tailored to the project.
29. It may also be possible for the IAASB to leverage work being undertaken by groups such as the IASB, the FSB, the World Bank, regional accountancy organizations, and other IAASB CAG Member Organizations to hold joint events or expand IAASB participation in their events beyond the IAASB Chairman's speaking engagements.
30. Finally, in order to increase the transparency with which the IAASB operates, it was also suggested the IAASB could invite speakers from stakeholder groups to present to the IAASB, conduct meetings between the full IAASB and the IAASB CAG, and enhance dialogue with academics, audit oversight bodies, training organizations and small business associations. The IAASB will consider doing so, in particular when stakeholder groups can serve to educate the Board at the commencement of a project, for example in specialized areas on which assurance is required or requested, such as XBRL, sustainability, and corporate governance. There may also be opportunities for the findings of academic research

(such as that described in paragraph 48) to be presented to the IAASB to inform its deliberations.

II. Contributing to Fundamental Debates through the Current Work Program

Audit Quality

31. Audit quality is intrinsic to the work of the IAASB. The pursuit of audit quality is at the core of the IAASB’s efforts to develop high-quality auditing standards, recognizing the external audit as an activity of significant public interest. The IAASB believes that auditors can only meet their public interest obligations through high-quality audits.
32. The ISAs are – and remain – the IAASB’s most important single product. The pivotal role that they play in contributing to audit quality is a key message that the IAASB will continue to emphasize in promoting their adoption around the world. Importantly, the IAASB believes that the recent improvements to the ISAs brought about by the Clarity Project will further enhance the consistency and quality of practice, particularly in areas such as accounting estimates (including fair value accounting estimates), materiality, use of an auditor’s expert, communication with those charged with governance, and related parties—some of which have been the foci of attention as a result of the global financial crisis.
33. Nevertheless, while the ISAs form an important pillar in supporting high-quality audits, it is essential that they be placed in the proper context as they are but one component of the audit quality concept. While the inputs (of which auditing standards are one) to audit quality are important, user perceptions of output also matter. Equally, the IAASB believes that audit quality and indeed the role of the auditor should not be viewed in isolation, but rather as a critical element of corporate governance and high-quality financial reporting. The following illustrates some components that the IAASB believes are key to audit quality.

Components of Audit Quality

Context Factors	<ul style="list-style-type: none"> • Governance and Accountability Arrangements • Regulation and Oversight • Players and Perceptions; Markets
Outputs & Responses	<ul style="list-style-type: none"> • Auditor’s Report • Other Auditor Communications and Disclosures • User Responses and Interactions, e.g. Audit Committees • A Professional Service (Client Service and Audit Fees)

Inputs & Indicators	<ul style="list-style-type: none">• Audit Process and Quality Control• Audit Evidence and Auditor Judgment• Auditing Standards• People: Education, Ethics, Mindsets, Culture• External Expectations (also a context factor)
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34. The IAASB believes that the implementation of the clarified ISAs should act as a catalyst in the interaction between auditors, entities, and regulators, in order to enhance the overall quality of financial reporting and auditing. The IAASB is convinced that the audit quality of tomorrow depends highly on the way the triangle of auditors, audit committees and regulators functions. While these three parties all have their own responsibilities, there is a common responsibility as well for each to appeal to the other two to do their best to raise overall quality. Accordingly, the IAASB intends to work closely with other parties in the financial reporting supply chain to develop a coordinated approach designed to first recognize the part each plays in audit quality and, over the longer term, to improve audit quality.
35. As a precursor to the IAASB engaging more fully with stakeholders on the topic of audit quality, the IAASB plans to finalize a communication (“thought piece”) in the next few months aimed at raising awareness of the concept of audit quality and its main components, including how the ISAs fit into the broader context. The intent is that this initiative will spark a broader debate about audit quality as it relates to auditing standards. For this reason, time will be needed in 2012 and possibly beyond to further the IAASB’s discussions on this topic.

[Note to the IAASB: We may have the opportunity to add more about the direction of this project after the IAASB’s discussion of Agenda Item 9 at its December 2010 meeting.]

Auditor Communications

36. Other projects on the IAASB’s current agenda are closely linked to audit quality. In 2009, the IAASB began its discussions on the findings from four academic research projects, commissioned jointly by the IAASB and the Auditing Standards Board (ASB) of the American Institute of Certified Public Accountants (AICPA). The purpose of commissioning this research was to help inform whether the standard auditor’s report needs to be improved and, if so, how. The research findings stimulated good debate, and it is clear there is continuing need to examine the demand for enhanced auditor communications that are relevant and meaningful to user needs. Respondents to the strategy survey echoed these views, and suggested that the IAASB’s focus on auditor communications, both within the auditor’s report and more broadly with those charged with governance, may be necessary.

37. While it is not yet clear how the IAASB’s debates in this critical area may evolve, and the potential outcome of this project cannot be predicted yet, the IAASB believes it is prudent to allow for the possibility that ISA 700¹⁰ may need to be revised. It is also important for the IAASB to liaise closely with stakeholders, including IOSCO’s Technical Committee, which has issued a *Consultation Report on Auditor Communications*, to enhance its debate. Finally, broader discussions on the role of the auditor may also influence the nature and content of the auditor’s report.

[Note to the IAASB: We may have the opportunity to add more about the direction of this project after the IAASB’s discussion of Agenda Item 7 at its December 2010 meeting.]

Auditing Financial Statement Disclosures

38. An emerging theme in a number of stakeholder discussions and in the responses to the strategy survey was the increasing importance being attributed to financial statement disclosures. Auditors are facing challenges as a result of the evolving nature of financial statement disclosures and the trend away from simpler disclosures toward more complex and subjective disclosures of matters such as sensitivity analyses, assumptions and objective-based disclosure requirements. The IAASB is interested in exploring perspectives about the preparation and auditability of disclosures, including what is meant by sufficient appropriate audit evidence for disclosures and how disclosure materiality and misstatements are viewed by different parties. The IAASB is liaising with accounting standard setters, regulators, auditors, preparers and users with a view to issuing a Discussion Paper in early 2011.

[Note to the IAASB: We may have the opportunity to add more about the direction of this project after the IAASB’s discussion of Agenda Item 8 at its December 2010 meeting.]

ISA Implementation Monitoring

39. Information gathered by the IFAC CAP indicates that 126 countries or jurisdictions¹¹ are using or are in the process of adopting or incorporating ISAs issued by the IAASB into their national auditing standards, or using them as a basis for preparing national auditing standards. ISAs are intended for use in all audits, including publicly traded companies, private business of all sizes, and government entities at all levels.
40. Recognizing the need to stay informed about the progress of implementation efforts globally, the IAASB has begun the development of a process for monitoring the implementation of the clarified ISAs, referred to as the ISA Implementation Monitoring project. The purpose of such a process is to assist the IAASB in determining whether there is any need for further refinement in its standards in order to achieve their intended objectives. In the longer term, the process would become a standing part of the IAASB’s effort to seek continuous

¹⁰ ISA 700, *Forming an Opinion and Reporting on Financial Statements*

¹¹ The IFAC CAP oversees the implementation and operation of the IFAC Member Body Compliance Program, which provides information about adoption and convergence efforts with respect to the ISAs. Information gathered by the IFAC Member Body Compliance Program about adoption of the extant ISAs can be accessed at web.ifac.org/isa-adoption/chart.

improvement of its standards. The IAASB published a summary report in October 2010 on the findings from the first phase of the project.¹² Liaison with key stakeholder groups, including IFIAR, will continue throughout 2010 and 2011.

41. The October 2010 report notes that the clarity conventions applied in the format, structure and drafting of the ISAs are viewed as helpful improvements. Most adopters welcomed the changes and confirmed that the format does not present problems when incorporating the clarified ISAs in national auditing standards and firm audit methodologies. In addition, many of those surveyed thought that the added rigor of the revised standards was appropriate and a helpful response to issues raised by the global financial crisis.
42. However, because the clarified ISAs have only recently become effective, it will be some time before the results of this implementation monitoring project become known. In addition, audit oversight bodies will likely not have findings on which to report about the consistency with which the clarified ISAs have been implemented until one or two audit and corresponding inspection cycles are completed. The project Task Force is currently liaising with IFIAR to ensure that IFIAR is given, and indeed takes, opportunities to highlight concerns noted as part of individual country inspection programs; this cooperation will be critical to the IAASB's ability to enhance audit quality.

The Needs of SMEs and SMPs

43. The IAASB, as well as IFAC, recognizes that SMEs are key players in the global economy. Entities and users of their financial information have diverse business reporting and information needs, and this is especially true for SMEs. Accordingly, the IAASB's current strategic focus acknowledges that the IAASB has a leading role to play in exploring standards for a range of services, including services other than the financial statement audit, that may be appropriate for such entities. The IAASB is currently revising its existing standards for review and compilation engagements as a first step in meeting the needs of SMEs and SMPs.¹³
44. It is the view of the IAASB that ISAs are capable of being applied to all audits and, as such, the IAASB does not support any possibility that the audit of SMEs might be carried out to limited auditing standards. This is consistent with IFAC's Policy Position on the matter.¹⁴ Nevertheless, the IAASB is conscious of the difficulties that practitioners may have in implementing ISAs in the audits of SMEs, and in particular the perception in some quarters that the ISAs have been written primarily with larger entities in mind. An important feature of the IAASB's standard-setting process is to ensure that representations from SMPs are taken into account, by seeking input from those in the SME and SMP communities. In addition,

¹² The publication can be accessed at web.ifac.org/download/IAASB-Implementation-Monitoring-Clarified-ISAs.pdf.

¹³ Further information about the range of assurance and related services that may be requested by SMEs is available in a new publication that can be accessed at web.ifac.org/download/IAASB_SME_Services_Brochure.pdf.

¹⁴ *IFAC's Support for a Single Set of Auditing Standards: Implications for Audits of Small- and Medium-sized Entities* (IFAC Policy Position 2, September 2008)

IFAC's SMP Committee¹⁵ forms a Rapid Response Team to give attention to individual standards at key stages.

45. SMPs in particular had expressed the view that a further period of stability is necessary with regard to the clarified ISAs. The IAASB had previously committed to provide auditors with a period of at least two years after the effective date of the clarified ISAs during which no new auditing standards would become effective, unless there is an urgent need to respond to new or unforeseen circumstances. The IAASB is currently revising two ISAs, ISA 610¹⁶ and ISA 720. In exposing proposed ISA 610 (Revised), the IAASB agreed the provisional effective date of the revised ISA would be approximately two years from the release of the final standard. In general, the IAASB believes that approximately 18 months from the release of a new or revised standard is a reasonable period to allow for effective adoption and implementation at the national level and accordingly, given the plans for finalization of proposed ISA 610 (Revised), no new auditing standards will become effective until 2013 at the earliest.
46. Conversations with key stakeholders also continue to highlight a need for the IAASB to monitor SME and SMP developments in adopting and implementing the clarified ISAs for audits of financial statements and to seek to respond to identified needs. The IAASB recognizes that its needs specific information on the extent and nature of any implementation difficulties on smaller audits, including information about areas that are perceived as having the greatest impact on being able to perform those audits cost-effectively.¹⁷ Accordingly, as part of the ISA Implementation Monitoring project, the IAASB has initiated a survey for SMPs from a range of countries that have already implemented the clarified ISAs. Information about use of the ISAs for audits of smaller entities performed for financial periods in 2010 and 2011 (that is, two audit cycles) will be analyzed as part of Phase Two of the project.
47. Other projects discussed in this paper are likely to be particularly relevant to SMEs including:
 - Communication of the meaning of an audit (see paragraph 22);

¹⁵ The SMP Committee represents the interests of professional accountants operating in SMPs and other professional accountants who provide services to SMEs. It develops papers on topics of global concern and provides input in the development of international standards and on the work of various IFAC boards and committees where appropriate. The SMP Committee has recently issued its *Guide to Using International Standards on Auditing in the Audit of Small- and Medium-Sized Entities, Second Edition*, to bring it in line with the clarified ISAs, and has also issued a *Guide to Quality Control for Small- and Medium-Sized Practices*. Both publications can be accessed at web.ifac.org/publications/small-and-medium-practices-committee.

¹⁶ ISA 610, *Using the Work of Internal Auditors*. In revising ISA 610, the IAASB is also proposing amendments to ISA 315, *Identifying and Assessing the Risks of Material Misstatement through Understanding the Entity and Its Environment*.

¹⁷ For this reason, in 2009, the IAASB commissioned a Staff Questions and Answers (Q&A) publication, *Applying ISAs Proportionately with the Size and Complexity of an Entity*. This publication is directed at highlighting provisions within the ISAs that help guide auditors in applying the requirements to audits of SMEs in an efficient and effective manner, and can be accessed at web.ifac.org/media/publications/e/applying-isas-proportionate/applying-isas-proportionate.pdf.

- Auditing financial statement disclosures (see paragraph 38);
- Academic research on the audit methodology of smaller firms (see paragraph 48);
- Responding to the findings of the ISA Implementation Monitoring project (see paragraphs 49–51);
- Revising the standard dealing with agreed-upon procedures engagements (see paragraph 52);
- Communicating about the benefits of adopting the clarified ISAs (see paragraphs 55–56);
- Identifying implementation challenges and developing materials to respond to these challenges (see paragraphs 57–60): and
- Considering further actions to assist in the implementation of ISQC 1, *Quality Control for Firms that Perform Audits and Reviews of Financial Statements, and Other Assurance and Related Services Engagements* (see paragraph 74).

Academic Research

48. Research is a fundamental input to high-quality standards. In addition to research on the auditor’s report, the IAASB has also collaborated with the International Association for Accounting Education and Research (IAAER) and the Association of Chartered Certified Accountants (ACCA) to commission four new research projects directed at informing the work of the IAASB. Research teams from Australia, Germany, the Netherlands, the United Kingdom, and the U.S. will investigate such matters as:
- The consistency in the application of ISAs;
 - The implications of XBRL for financial statement audits;
 - The audit methodology of smaller firms; and
 - The nature of professional judgments in audits.

It is possible that the IAASB’s debate following these areas may result in the prioritization of one or more projects in the period 2012–2014.

III. Rationale for Proposed New Projects to Be Commenced in 2012–2014

Responding to the Findings of the ISA Implementation Monitoring Project

49. Although a number of respondents to the strategy survey highlighted the view that the ISAs that were not revised as part of the Clarity Project (see Appendix 5) should be addressed, there was no clear consensus on the ISAs in this category in need of updating and the reasons why they should be updated. Previous discussions have indicated there may be scope for improvements to ISA 250, *Consideration of Laws and Regulations in an Audit of Financial Statements*; ISA 530, *Audit Sampling*; and ISA 570, *Going Concern*. An initial Staff review of comments received on those ISAs that were only redrafted did not indicate an urgent need to revise any other ISAs. However, the IAASB recognizes that it is through the ISA Implementation Monitoring project that any implementation challenges warranting revision

of the ISAs or the development of further guidance to promote consistent implementation of the ISAs will be identified. It may be that discussions with regulators, audit oversight bodies, or those adopting the ISAs may identify individual ISAs that could benefit from a revision, though equally a number of these stakeholders have indicated that a stable period would be welcomed.

50. Particularly important to note in the Phase 1 results of the ISA Implementation Monitoring project is the conclusion that, in general, there were no themes that suggest that implementation of any of the ISAs poses significant difficulties, with the exception of some concerns about one, relatively narrow, aspect of ISA 600.¹⁸ Respondents also supported the project on the current work program to consider whether to develop further certain conceptual aspects of ISAs, such as audit evidence and professional judgment, and suggested additional communications on professional skepticism and reasonable assurance would be worthwhile.
51. Accordingly, during 2012–2014 the IAASB plans to undertake one or more new project(s) that emerge as the most pressing issues in the ISA Implementation Monitoring project. The output of these projects could be revisions to the ISAs (either individual ISAs or limited amendments as part of a broader improvements project), new ISAs, new IAPSs, Staff publications, or other outputs that would be considered implementation guidance. The proposed outputs for these projects will be considered in the context of the IAASB's discussion of project proposals before such projects are commenced.

Revising the Standard Dealing with Agreed-upon Procedures Engagements

52. Discussions with SMPs and responses to the survey have indicated that international donors, banks, and other sources of capital often request an entity to have agreed-upon procedures performed by a practitioner in lieu of an audit or in order to ensure specific procedures are performed on key account balances. The Task Force dealing with the revisions to ISRE 2400 and ISRS 4410 has also highlighted the need for revision to ISRS 4400, *Engagement to Perform Agreed-upon Procedures Regarding Financial Information*, to enhance the suite of engagement standards available to practitioners to meet the needs of entities that do not require an audit but find value in having the practitioner involved in some way. Work to revise ISRS 4400 may also be meaningfully leveraged for the XBRL initiative, as there is currently a demand in some jurisdictions for agreed-upon procedures that deal with the completeness, accuracy, and consistency of XBRL-tagged data. Finally, a revision to ISRS 4400 would bring it in line with other improvements made to through the Clarity Project regarding the auditor's compliance with relevant ethical requirements. Accordingly, the IAASB intends to discuss a project proposal relating to the revision of ISRS 4400 in 2011.

¹⁸ ISA 600, *Special Considerations—Audits of Group Financial Statements (including the Work of Component Auditors)*. The issue relates to additional planning considerations that may be necessary in order for a group auditor to obtain the necessary audit evidence when the entity under audit has joint ventures of significant influence but not control over significant component investments. The IAASB has asked the Forum of Firms to provide information about the extent and nature of problems experienced on 2010 audits.

Revising or Withdrawing the Standard on Prospective Financial Information

53. In approving the project to develop proposed ISAE 3420, *Assurance on the Proper Compilation of Pro Forma Financial Information Included in a Prospectus*, the IAASB contemplated that the next phase of that project would be to consider revising ISAE 3400, *The Examination of Prospective Financial Information*. This was based on the preliminary view that the initial project would resolve a number of issues that are common to pro forma financial information and prospective financial information.
54. Feedback to date has indicated that extant ISAE 3400 is not widely used in practice by professional accountants, mainly because it does not provide for the opinion that many regulators require and the level of assurance required on the underlying assumptions is viewed by some as being too high. The IAASB's experience in developing ISAE 3420 is likely to provide information relevant to determining whether ISAE 3400 can be meaningfully revised or whether it should be withdrawn. Consideration of withdrawal will need to take into account the views of jurisdictions that are presently using the ISAE, as well as those currently exploring whether to require assurance on prospective financial information. Should the IAASB determine that revision is more appropriate, the timing of the project will need to be considered in light of the IAASB's overall prioritization of its new projects. To assist the IAASB in its initial considerations, which are likely to take place during 2011, respondents are invited to raise any matters that may be relevant to their particular jurisdiction.

Communicating about the Benefits of Adopting the Clarified ISAs

55. As noted in *Further Discussion on Key Elements of This Paper – Section I*, ongoing communications activities are included in the IAASB's future work program. Respondents to the survey believed communicating about the benefits of adopting the clarified ISAs is critical to their global adoption. The IAASB, in cooperation with IFAC's Communications Department,¹⁹ will explore whether basic publications highlighting why the IAASB believes the clarified ISAs should be adopted could be developed and tailored to key groups considering adoption such as legislators, regulators, public sector auditors, SMPs, and developing nations, citing the expected benefits including improved consistency, comparability and quality. These publications could acknowledge the initial costs required for adoption but highlight the work IFAC has undertaken to facilitate quality translation²⁰ of the ISAs and the work of the SMP Committee to develop guides to the application of the clarified ISAs and ISQC 1, in addition to the modules developed by the IAASB on the ISAs

¹⁹ The Communications Department assists the IAASB in reaching its target audience, through the issuance of press releases and eNews, website enhancements and other communications initiatives.

²⁰ IFAC's Translation function works to promote the use of the IAASB's materials by permitting interested parties to reproduce and translate them. It maintains a database of translation of key publications by external parties, and has been working closely with the EC to ensure one quality translation of the clarified ISAs per language.

that had been substantively revised during the Clarity Project.²¹ This work is important to explain why ISAs can be used in both audits of publicly-listed entities and private entities.

56. As work on the ISA Implementation Monitoring project continues, including the planned liaison with SMPs who are adopting the ISAs, there may be further opportunities for the IAASB to share “success stories” of those adopting the ISAs to educate those considering whether to adopt the ISAs about how ISAs contribute to audit quality.

Identifying Implementation Challenges and Developing Materials to Respond to These Challenges

57. The IAASB believes that communication is a two-way process that enables the IAASB to hear others’ concerns about practice, and what standard setters can do about them; hear concerns about standards; be aware of recent developments in practice; and be aware of relevant regulatory developments. This communication is particular necessary in regard to implementation of the IAASB’s standards. Once adopted, successful implementation of standards is vital to ensure professionals understand and apply those standards appropriately.
58. A wide range of activities needs to be undertaken to facilitate implementation by jurisdictions and auditors, for example, communications, translation, revision of audit methodologies, audit software updates, and auditor training. While the ISA Implementation Monitoring project will assist in identifying issues noted in implementing the clarified ISAs, outreach activities with NSS and IFAC member bodies, in particular those in developing nations, as well as SMPs, can further inform the IAASB about activities it could take to assist implementation. Doing so will allow the IAASB to determine what its role should be in developing implementation guidance, including whether partnership with others can be explored to leverage resources. For example, the IAASB’s initial consideration of how relevant materials developed by NSS can be shared suggested that a practical solution may be to make available a brief publication that lists major initiatives by the NSS. Cooperation with the SMP Committee and participation in other IFAC initiatives may also allow the IAASB to assist in responding to implementation challenges.
59. To date, IAASB Staff has developed the Clarity Center website, video modules, and staff publications to communicate about implementation, but it is likely there are more activities that could be undertaken both at a Board and Staff level to address the challenges noted in implementation. Respondents to the survey suggested explaining key considerations to be applied in the application of the audit risk standards, in particular for SMEs, and further efforts with regulators and audit oversight bodies, could lead to more consistent application of these standards in practice and address concerns that persist regarding the extent of documentation needed to comply with the ISAs.
60. Materials that can help people understand the reasons for IAASB’s decisions and how a new or revised standard can be implemented were also suggested as useful outputs. The IAASB

²¹ As an initial step in exploring the use of new promotional publications, *The Clarified International Standards on Auditing – An Overview & Guide to Resources* publication was developed in advance of the World Congress of Accountants. The brochure can be downloaded at web.ifac.org/download/IAASB_Clarity_Resources_Brochure.pdf.

believes the pilot of the impact analysis approach²² may assist in this regard, and there may be opportunities for enhancements to the Staff Basis for Conclusions and other overview communications designed to either promote the standard-setting proposals when exposure drafts are issued or assist with implementation of final standards.

Seeking Feedback on Implementation Experiences with ISAE 3402

61. ISAE 3402, issued in 2009, is effective for service auditor's assurance reports covering periods ending on or after June 15, 2011. With ISAE 3402 being the first new assurance standard, other than the ISAs, developed under the IAASB's *International Framework for Assurance Engagements*, the IAASB agreed when finalizing the standard that it should actively seek feedback in 2013 on the experiences of service auditors and others with its implementation. In addition, the current revision of ISAE 3000 may identify matters for revision in ISAE 3402 that will be considered.
62. There is likely an opportunity to collaborate with the AICPA, as they had finalized their equivalent standard at the same time ISAE 3402 was finalized. It is proposed that a survey be developed to gather initial feedback and assist the IAASB in determining whether further action may be appropriate.

IV. Suggestions for Additional New Projects

63. While respondents to the strategy survey suggested a variety of new initiatives that could be undertaken by the IAASB, the projects listed in the Column C of the *Overview of Possible Actions to Implement the Proposed Strategy* (described in greater detail below) received significant support across a number of different stakeholder categories. Discussions with the IAASB CAG also have indicated that these areas may warrant the IAASB's attention in the future.
64. As the IAASB does not have the capacity to undertake all of these initiatives, it is seeking the views of respondents as to which, if any, should be considered for inclusion on the IAASB's future agenda. The amount of projects that can be undertaken will depend on the relative complexity of those projects selected, however, the IAASB currently anticipates that three new projects can be undertaken. Projects will be selected based on the views of respondents to this consultation paper about the merits of the suggestions for additional new projects, and available resources. For new assurance standards, because of differences in legal and regulatory frameworks around the world, consideration of whether it is feasible to develop international standards in certain of these areas will be necessary, in particular if established accepted criteria do not exist.

²² As contemplated in the current work program, the IAASB is piloting a broader IFAC initiative to provide a uniform and consistent approach to the analysis of impacts that will help prepares, users, and regulators understand the factors considered and conclusions reached when developing standards.

Developing Guidance for the Audits of Banks

65. A number of regulators expressed particularly strong views for the IAASB to update guidance contained in IAPS 1004, *The Relationship between Banking Supervisors and Banks' External Auditors*, and IAPS 1006, *Audits of the Financial Statements of Banks*. In their view, this guidance remains useful and should be supplemented with lessons learned in addressing financial crisis issues. They also believed including a program on the IAASB's agenda would respond to concerns of audit regulators, audit firms and supervisory agencies that audit procedures may need to be strengthened in areas such as risk assessment, impairments, disclosures, and going concern. NSS, however, have previously indicated the view that developing international guidance in a highly nationally-regulated industry (on in other specialized industries, such as insurance) may not be effective.
66. At its June 2010 meeting, the IAASB agreed to a proposal to withdraw all of the extant IAPSs, including IAPS 1004 and IAPS 1006, given that they are out-of-date, subject to the views of stakeholders on consultation.²³ The public consultation document explains that, while IAPSs do not establish additional requirements beyond those in the ISAs, auditors should determine whether any IAPS is relevant to the circumstances of the audit and, if so, obtain an understanding of its content. This consultation also proposes IAPSs only be developed in particular circumstances, by outlining a number of factors the IAASB intends to consider in the future in determining whether to develop a new IAPS. In addition, due to the specialized nature of the topic, the inclusion of this project on the IAASB's work program would be contingent upon the assistance that can be given by the banking regulators and supervisors, as well as firm experts. The IAASB has noted that, if undertaken, this would be a complex and resource intensive project.

Evaluating Whether to Develop a New ISAE Addressing Sustainability Reporting

67. The 2009–2011 Work Program contemplated that the IAASB would review Royal NivRA's assurance standard on sustainability reporting to determine whether it was an appropriate basis for the development of an international standard. The IAASB's work in developing proposed ISAE 3410 has highlighted the difficulties in developing assurance standards when established accepted criteria do not exist, in particular when the demand for assurance is emerging and may differ in various jurisdictions.
68. Ongoing work in accounting for sustainability via the International Integrated Reporting Committee (IIRC),²⁴ formed by the Prince's Accounting for Sustainability Project (A4S) and the Global Reporting Initiative (GRI), is likely to further assist the IAASB in evaluating whether and, if so, when developing a topic-specific assurance standard in this area may be appropriate. Respondents are invited to share views on their experiences with standards that

²³ The IAASB is currently exposing proposals relating to the withdrawal of the six extant IAPSs, and clarification of the status and authority of new IAPSs. Further information can be found at www.ifac.org/Guidance/EXD-Details.php?EDID=0143.

²⁴ The IIRC brings together a cross section of representatives from the corporate, accounting, securities, regulatory, NGO, and standard-setting sectors. Ian Ball, CEO of IFAC, serves as co-chairman of the Working Group.

may exist in their particular jurisdictions and views as to how a potential project on sustainability should be prioritized, if at all.

Evaluating Whether to Develop a New ISAE Addressing Assurance on Corporate Governance Statements

69. A number of respondents were of the view that the global financial crisis has demonstrated that robust, transparent governance practices need to be embedded in all organizations, along with a re-evaluation of remuneration structures, board level expertise and training, and risk management. Corporate governance statements, providing increased transparency for investors and other stakeholders, have gained in importance in the aftermath of the crisis. Assurance by independent qualified accountants is seen to enhance the credibility of the information.
70. IFAC and the United Nations Conference on Trade and Development (UNCTAD) recently hosted a meeting²⁵ of accountancy leaders from around the world to discuss next steps for global corporate governance reforms and agreed the accountancy profession has a key role to play in strengthening corporate governance and facilitating the integration of governance and sustainability into the strategy, operations and reporting of an organization.
71. As this is an area which is of public interest and is a global topic that is becoming more relevant to those charged with governance demonstrating responsibilities for monitoring and risk assessment, in particular as a means of helping prevent future financial crises, the IAASB believes it should continue to monitor developments in this area, as the topic is interrelated to both audit quality and auditor communications. Doing so will allow the IAASB to evaluate whether and, if so, when developing a topic-specific assurance standard in this area may be appropriate.

Evaluating Whether to Develop a New ISAE Addressing Assurance on Internal Control

72. A number of respondents to the survey also indicated that internal control and risk management over financial reporting are key factors of corporate governance as well as reporting thereon. While the audit of internal control over financial reporting is not required by regulation in many jurisdictions,²⁶ some respondents were of the view that there will be a growing demand for this service. As those charged with governance become more aware of their own responsibilities in this area, respondents predicted that they might voluntarily turn to their auditors to provide assurance in this area. Others believed the global financial crisis has also highlighted the need for auditors and users of financial statements to have an in-depth understanding of an entity's risk management processes in place to identify, classify, and account for transactions. Regulators in particular indicated a desire for a standard to address this topic. At this stage, it is not envisioned that, even if a new standard were to be

²⁵ More information on the conference is available at press.ifac.org/news/2010/10/accountancy-summit-on-corporate-governance-reform-looks-beyond-the-global-financial-crisis.

²⁶ China, Japan and the U.S. have already implemented requirements for auditors to report on internal control over financial reporting.

developed, this would become part of the ISAs (that is, the IAASB does not propose moving towards an integrated audit model) absent broad regulatory requirements to do so.

Redrafting the Standard Dealing with Reviews of Interim Financial Information in the Clarity Format

73. Subject to the IAASB's agreement to revise ISRS 4400, ISRE 2410²⁷ would then be the only IAASB standard not currently presented in the Clarity format. Because this standard is currently used in practice and is important in a number of engagements, in particular in relation to publicly listed entities, there may be merit in redrafting it in accordance with the Clarity conventions, in order to ensure it is applied consistently. Doing so also would allow the IAASB, if considered necessary, to better explain the distinction between an interim review and reviews as envisioned by revised ISRE 2400, in particular as regards the auditor's report on an interim review engagement. Should this project be added to the IAASB's future work program, a more substantive revision of ISRE 2410 would not be contemplated, as it is generally used in practice without significant difficulties.

Considering Further Actions to Assist in the Implementation of ISQC 1

74. Respondents explicitly suggested that the ISA Implementation Monitoring work should also seek to obtain feedback from SMPs regarding their adoption experiences, in particular with respect to ISQC 1. The standard has raised concerns for SMPs particularly with regard to cost constraints and availability of technical resources and expertise to conduct engagement quality control reviews. Although the SMP Committee has provided guidance material on the topic, the IAASB will consider what further action could be taken to encourage knowledge-sharing and partnership by SMPs as part of their obligation to comply with the standard. For example, it has been suggested that a publication similar to the Staff Q&A, *Applying ISAs Proportionately with the Size and Complexity of an Entity*, could be developed to explain how ISQC 1 can be applied proportionally in audit engagements, as well as assurance and related services engagements.

²⁷ ISRE 2410, *Review of Interim Financial Information Performed by the Independent Auditor of the Entity*

Appendix 1

The IAASB’s International Pronouncements

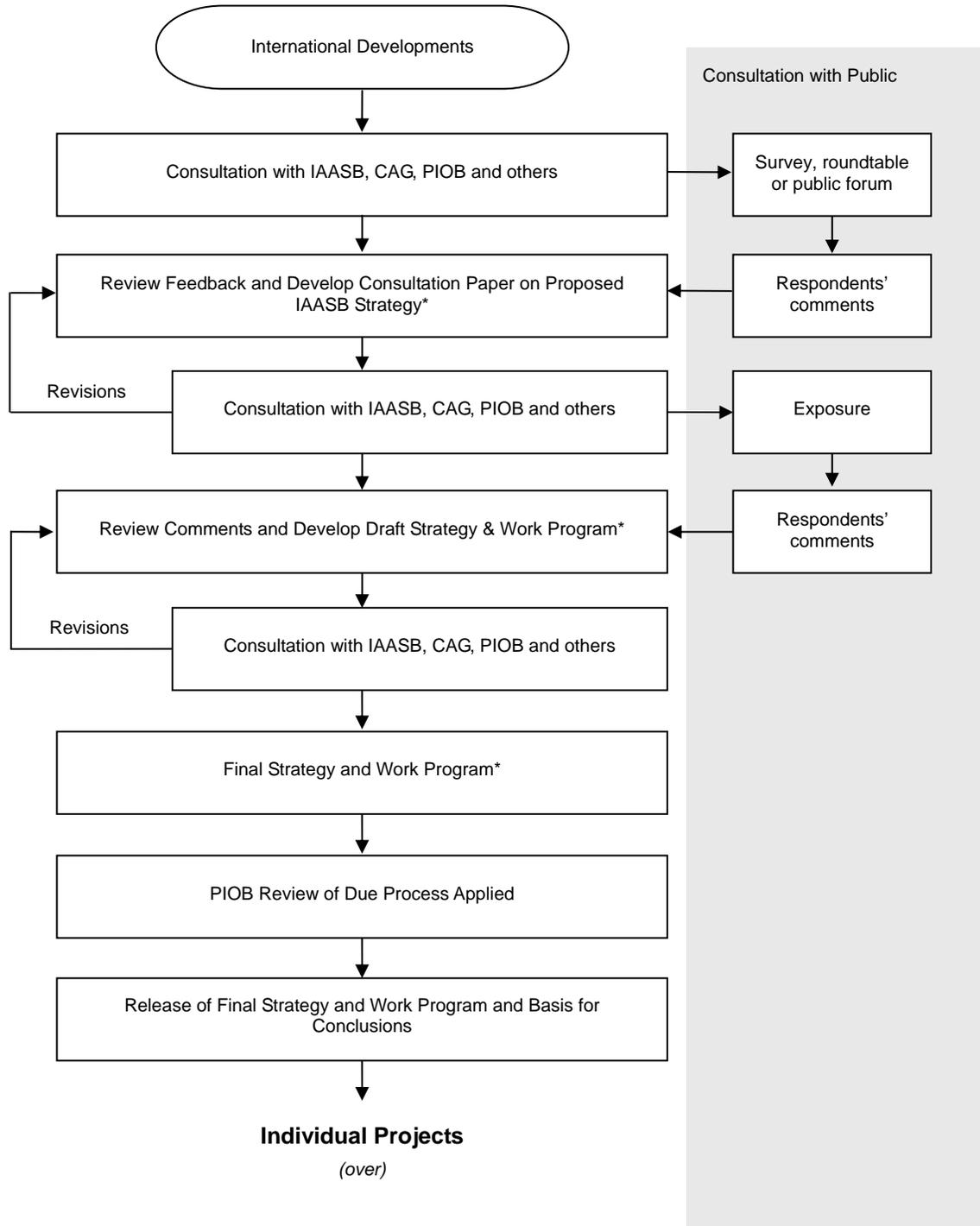
Type of Pronouncement	Authority	Catalogue of Existing Pronouncements and Those under Development
International Standards on Auditing (ISAs)	Applied in the audit of historical financial information	<p>The year 2009 marked the end of the IAASB’s Clarity Project, which involved the application of new drafting conventions to all ISAs, either as part of a substantive revision or through a limited redrafting, to reflect the new conventions and matters of clarity generally. A listing of ISAs that were redrafted only is included in Appendix 5.²⁸</p> <p>The suite of 36 newly updated and clarified ISAs and a clarified ISQC became effective for audits of financial statements for periods beginning on or after December 15, 2009.</p>
International Standard on Quality Control (ISQC)	Applied for all services falling under the ISAs, ISAEs and ISRSs	ISQC 1, <i>Quality Control for Firms that Perform Audits and Reviews of Financial Statements, and Other Assurance and Related Services Engagements</i>
International Standards on Review Engagements (ISREs)	Applied in the review of historical financial information	Proposed ISRE 2400 (Revised), <i>Engagements to Review Financial Statements</i>
		ISRE 2410, <i>Review of Interim Financial Information Performed by the Independent Auditor of the Entity</i>

²⁸ A listing of all the clarified ISAs, their full text, and other useful information about the development of the clarified ISAs, including the improvements arising from the Clarity Project, can be accessed at www.iaasb.org/clarity-center.

International Standards on Assurance Engagements (ISAEs)	Applied in assurance engagements dealing with subject matters other than historical financial information.	Proposed ISAE 3000 (Revised), <i>Assurance Engagements Other than Audits or Reviews of Historical Financial Information</i>
		ISAE 3400, <i>The Examination of Prospective Financial Information</i>
		ISAE 3402, <i>Assurance Reports on Controls at a Service Organization</i>
		Proposed ISAE 3410, <i>Assurance on a Greenhouse Gas Statement</i>
		Proposed ISAE 3420, <i>Assurance on the Process to Compile Pro Forma Financial Information Included in a Prospectus</i>
International Standards on Related Services (ISRSs)	Applied to compilation engagements, engagements to apply agreed-upon procedures to information and other related services engagement as specified by the IAASB	ISRS 4400, <i>Engagements to Perform Agreed-upon Procedures Regarding Financial Information</i>
		Proposed ISRS 4410 (Revised), <i>Compilation Engagements</i>
International Auditing Practice Statements (IAPSs) ²⁹	Issued to provide practical assistance to auditors in implementing ISAs and to promote good practice	Proposed IAPS 1000, <i>Special Considerations in Auditing Complex Financial Instruments</i>

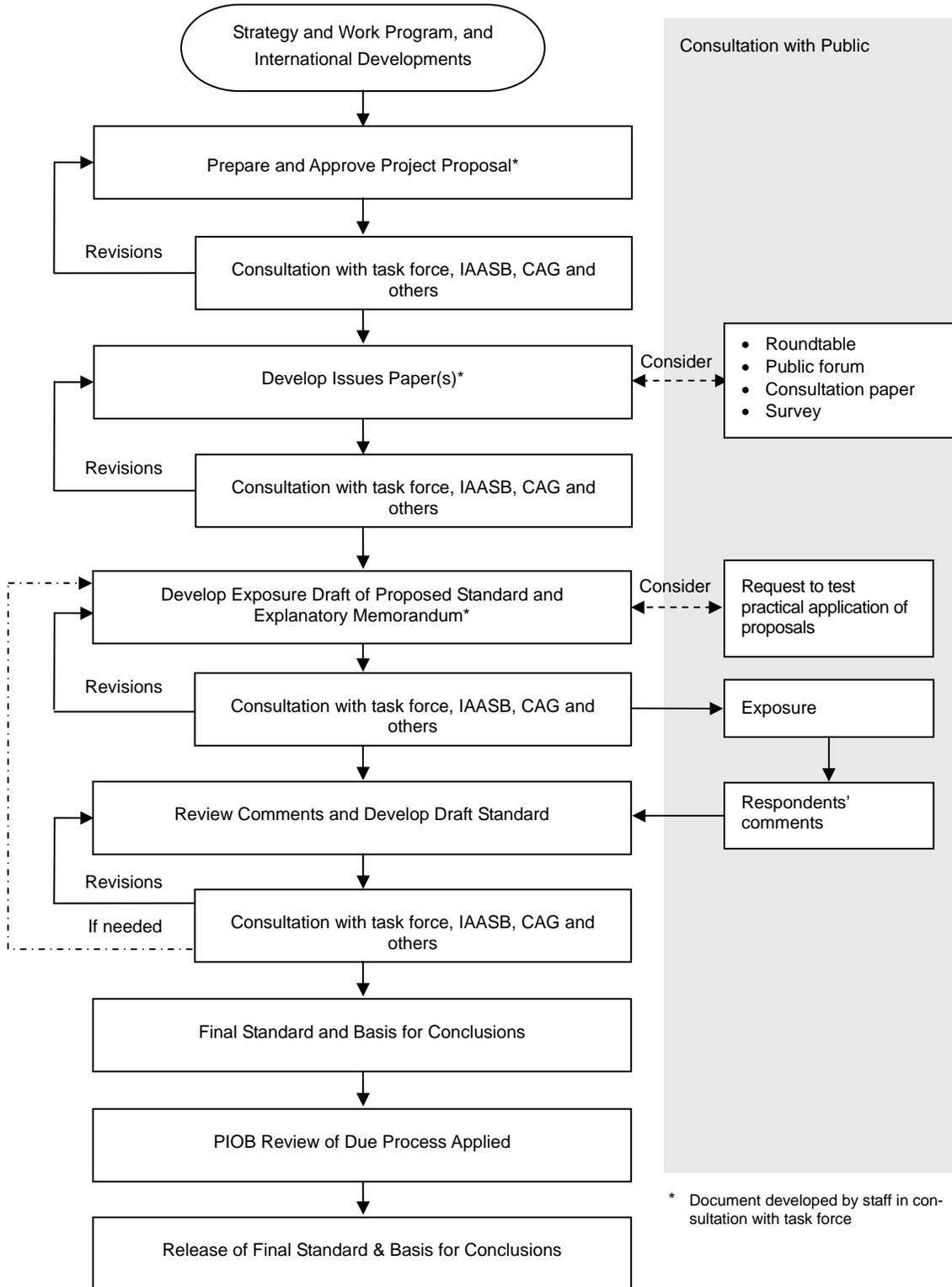
²⁹ The IAASB is currently exposing proposals relating to the withdrawal of the six extant IAPSs, and clarification of the status and authority of new IAPSs, including proposed IAPS 1000. Further information can be found at www.ifac.org/Guidance/EXD-Details.php?EDID=0143.

Key Elements of Due Process



* Document developed by staff in consultation with IAASB Steering Committee

Individual Projects



* Document developed by staff in consultation with task force

Inputs to the IAASB's Processes

Setting the Strategy and Work Program

1. The process of setting the IAASB's future strategy and work program involves a formal survey of the IAASB's stakeholders to obtain views about issues that they believe should be addressed by the IAASB in the immediate future. Accordingly, a public survey was issued in April 2010, the results of which formed the preliminary basis for the IAASB's consideration in developing this consultation paper.
2. This consultation paper forms the most vital stage of the consultation process to set the IAASB's future agenda. It presents the proposed strategy for 2012–2014, possible actions to implement the proposed strategy, and the basis for them. It takes account of:
 - The findings of the strategy review survey in April 2010. 101 responses were received, including responses from IFAC member bodies, regional professional accountancy organizations, organizations representing preparers of financial statements, audit firms and public sector audit organizations, and public authorities and international regulators.
 - Consultation with the IAASB CAG, which has wide representation of those with an interest in auditing and assurance services, including preparers of financial statements and other information, investors, regulators and other users, including SMEs.
 - Consultation at meetings of the IAASB—National Auditing Standard Setters, the IFAC SMP Committee,³⁰ the IOSCO Standing Committee No. 1 on Multinational Accounting and Disclosure, the Financial Audit Subcommittee of INTOSAI, IFIAR, and the Forum of Firms (Forum);³¹ and
 - Other international outreach activities with key stakeholders undertaken by the IAASB's Chairman, Deputy Chair and Staff. During 2010, there were 78 meetings with, or presentations to, stakeholders in 24 countries.
3. The proposed strategy and possible actions, amended in the light of comments received, will form the basis for the *Strategy and Work Program for 2012–2014*. The strategic plan and work program set the direction and priorities of the activities of the IAASB. They are set within the context of the overall strategy of IFAC, and respond to significant developments in

³⁰ Rapid response teams consisting of SMP Committee members endeavor to comment on IAASB's projects at key stages. The IAASB Chairman and other IAASB members may also be invited to SMP Committee meetings to discuss projects with particular relevance to SMPs.

³¹ The IAASB consults with the Forum in developing its strategy and work program and also in the context of individual projects. There are currently 21 full members of the Forum. The Transnational Auditors Committee (TAC) is the executive arm of the Forum and a committee of IFAC, providing the official link between the Forum and IFAC. Forum members promote the consistent application of high-quality audit practices worldwide, including the use of ISAs, and support convergence of national audit standards with ISAs. The Forum also discusses "best practices" in areas including quality control, auditing practices, independence, and training and development.

- the environment in which assurance services are performed and in which standards for such services are set.
4. In line with the IAASB’s Terms of Reference and as illustrated in Appendix 3, the PIOB will evaluate whether due process used to develop the strategic plan and work program has been followed effectively and with proper regard for the public interest, the appropriateness of items in the work program, and the completeness of the strategy and work program from a public interest perspective. It will also consider whether to recommend, from a public interest perspective, that an item(s) be added to the work program. It is currently envisaged that the strategic plan and work program will be finalized by the fourth quarter of 2011.
 5. The commencement of any new project, however, is subject to the IAASB approving a proposal that confirms that the project is an effective and efficient allocation of the resources of the IAASB. The IAASB is also aware of the need to be flexible in its planning process to be able to respond to new events and circumstances as they arise and the need to alter its work program to address new priorities.

Developing International Pronouncements

6. The IAASB considers its mandate to act in the public interest in all activities it undertakes. When asked what the most important component of the IAASB’s work in serving the public interest was, many respondents to the survey cited its areas of strategic focus and felt the IAASB should be seen as acting in the public interest, by operating in a transparent manner following due process and with its members being seen as independent.
7. The IAASB is required to be transparent in its activities, and the development of its international pronouncements is conducted under its [Due Process and Working Procedures](#), which have been approved by the PIOB. Before a final pronouncement can be issued, the PIOB evaluates whether due process has been followed effectively and with proper regard for the public interest. The stages of due process followed by the IAASB in developing an international pronouncement are illustrated in Appendix 3.
8. To a large extent, due process dictates the time it takes to develop an IAASB pronouncement. In following due process, each project takes approximately 36 months to complete, which includes an exposure period of ordinarily 120 days. A significant component of acting in the public interest is ensuring that relevant input is obtained by the IAASB throughout the development of a pronouncement. The IAASB invests significant time discussing issues before an exposure draft is released and considers comments received on exposure at one or more meetings approximately four months after an exposure period ends, which allows the project Task Force to then revise the proposed pronouncement in response to comments.
9. The overall time to complete a project is also dependent on the complexity of the subject matter and planned outreach activities (including the need to hold forums or roundtables). In addition, the IAASB discusses each project with the IAASB CAG a minimum of three times (at the project inception, prior to exposure, and prior to finalization).

Appendix 4

Current (Ongoing) Actions the IAASB Intends to Continue

Global Acceptance, Convergence and Partnership

- Continue active discussions with the IAASB CAG and NSS (including the PCAOB), public authorities (in particular the EC), audit oversight bodies and international regulators (including the BCBS, European Group of Auditors' Oversight Bodies, International Association of Insurance Supervisors, IFIAR and IOSCO) aimed at achieving common agreement on the content and breadth of any proposed new standards to meet the common needs of all parties and lead to global acceptance and endorsement of the standards.
- Continue to cooperate with the INTOSAI, promoting the use of ISAs as the basis for audits in the public sector.
- Continue to seek regular consultation with the IFAC SMP Committee on issues of relevance to SMEs and practices regarding audit and quality control standards.
- Continue to seek regular consultation with the IFAC PAODC on issues of relevance to developing nations regarding audit and quality control standards.
- Continue the IAASB-IASB liaison, aimed at providing the IASB with timely inputs on aspects of its proposed standards that may have potential verifiability or auditability issues and other matters that may affect the pronouncements of the IAASB or create a need for new pronouncements.
- Continue to take steps to address the issues of translation; the frequency, volume and complexity of changes; and the setting of effective dates.

Communication

- Continue to issue a press release, communicating the approval of each proposed or final IAASB pronouncement and any other major activity of the IAASB.
- Continue to publish an overview for each new final pronouncement to explain its background and scope, provide a summary of its key provisions, and explain the implications for practice.
- Continue to issue IAASB eNews communications (three to four times per year), using these vehicles to encourage responses to the IAASB's consultation and publicize adoption and implementation support vehicles available.
- Continue to publish an annual report written to a broad interested audience on the performance of the IAASB, including a report on progress against this action plan and on how IAASB has complied with its stated due process.
- Continue to promote the activities and publications of the IAASB through the IAASB website (this include agenda material, audio records of meetings, meeting highlights, proposed pronouncements and related comment letters, final pronouncements and bases for conclusions) and evaluate how technology may be better used to reach a broader audience.
- Continue to enhance communications with NSS (including the annual meeting with 13 NSS), regulators, IFAC member bodies, the Forum of Firms, academics and conference organizers.

Appendix 5

ISAs and ISQC Redrafted but Not Revised as Part of the Clarity Project

ISA 210, *Agreeing the Terms of Audit Engagements* (Issued March 1994)

ISA 220, *Quality Control for an Audit of Financial Statements* (Issued February 2004)

ISA 230, *Audit Documentation* (Issued September 2005)

ISA 240, *The Auditor's Responsibilities Relating to Fraud in an Audit of Financial Statements* (Issued February 2004)

ISA 250, *Consideration of Laws and Regulations in an Audit of Financial Statements* (Issued March 1994)

ISA 300, *Planning an Audit of Financial Statements* (Issued June 2004)

ISA 315, *Identifying and Assessing the Risks of Material Misstatement through Understanding the Entity and Its Environment* (Issued October 2003)

ISA 330, *The Auditor's Responses to Assessed Risks* (Issued October 2003)

ISA 500, *Audit Evidence* (Issued October 2003)

ISA 501, *Audit Evidence—Specific Considerations for Selected Items* (Issued March 1994)

ISA 510, *Initial Audit Engagements—Opening Balances* (Issued November 1993)

ISA 520, *Analytical Procedures* (Issued June 1993)

ISA 530, *Audit Sampling* (Issued November 1997)

ISA 560, *Subsequent Events* (Issued November 1993)

ISA 570, *Going Concern* (Issued June 1999)

ISA 610, *Using the Work of Internal Auditors* (Issued March 1994)

ISA 700, *Forming an Opinion and Reporting on Financial Statements* (Issued December 2004)

ISA 710, *Comparative Information—Corresponding Figures and Comparative Financial Statements* (Issued March 1996)

ISA 720, *The Auditor's Responsibilities Relating to Other Information in Documents Containing Audited Financial Statements* (Issued November 1993)

ISQC 1, *Quality Control for Firms that Perform Audits and Reviews of Financial Statements, and Other Assurance and Related Services Engagements* (February 2004)